

TY NEWS

ke issue with EPA's conceptual plan

sistence fishing for both cultural and economic reasons, and neighborhoods that experience exposure due to being near the river. These groups have been exposed to cumulative contaminants and EPA needs to address both Environmental Justice and Cumulative Risk issues in the remedy selected.

Communities adjacent to the North Reach of the Willamette have been a historic dumping ground for the negative effects of industry including not only the superfund site, but hazardous materials tank farms, industrial air pollution, diesel exhaust and truck movement. North Portland is also the location for a sewage treatment plant and a major, former dump. Our communities are "becoming weary of being the repository of everything that stinks, burns or blows up," as St. Johns activist Ben Poe has noted. Cleanup alternatives that leave either significant amounts of contamination in the river or which result in a Confined Disposal Facility are inequitable and environmentally unjust, and add to the cumulative effects on community members.

All of the current options rely far too heavily on approaches such as monitored natural recovery (MNR) that leave contamination in place across most of the lower Willamette (Alternative G relies on MNR across more than 60% of the superfund site), unreliable institutional controls such as warning signage, and fail to provide credible evidence that compliance with legal requirements for the Clean Water Act will be achieved. Contamination left behind is subject to re-exposure by flood, expected geological events or navigational accidents and so poses an ongoing risk to human health and the environment. The end result of any of the options would be that our river would remain severely contaminated, our communities, especially our most vulnerable underserved communities, would remain at risk for generations, fish and wildlife populations would



Jackie Calder, Vice Chair, Portland Harbor Community Advisory Group

"It is at odds with years of research and common sense to ask the public to accept that natural recovery would suddenly represent an effective cleanup strategy for contaminants which have already remained in the river for 50 to 100 years or more"

~ Portland Harbor Community Advisory Group, written testimony to EPA National Remedy Review Board

Contamination in the lower Willamette directly undermines long-term investments in the river by the community that is already in the millions. A clean lower river could be an integral part of our community, providing recreation, food through fishing, an attraction for development and visitors, and could build our identity as a gateway to nature. The cleanup is also a revenue and job generator. An EcoNorthwest Study of the lower Willamette showed that every dollar of cost to

continue to experience significant harm from exposure and bioaccumulation, and access to the river would remain restricted.

It is time now to move forward with effective, vigorous, long-term cleanup strategies that place a significantly higher priority on removing contaminants from our river. We call on EPA to implement a more aggressive plan that we refer to as Alternative G+. This alternative will reduce the acreage of MNR from that in Alternative G, reduce the extent of capping and increase the amount of surface contamination removed.

clean-up will generate more than a dollar's worth of economic activity.

The river is held in trust for citizens, from headwaters to confluence it belongs to all. This is our one chance to make a difference. Let's have the fortitude to do the cleanup right the first time with Alternative G+."

<http://portlandharborcag.info/sites/default/files/CommentstoNRRBfromPHCAGr.pdf>

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