

DISCUSSION PAPER
PORTLAND HARBOR SUPERFUND CLEANUP PLAN
West Multnomah Soil & Water Conservation District

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CONTEXT

Portland Harbor is a heavily industrialized stretch of the Lower Willamette River north of downtown Portland, from the Broadway Bridge (RM 11.8) to Kelly Point Park (RM 1.9); an area covering roughly 2,100 acres. The US Environmental Protection Agency (EPA) listed Portland Harbor on the National Priorities List, known as Superfund, in December 2000 because sediments in the river are contaminated with various toxic compounds, including metals, polycyclic aromatic hydrocarbons, polychlorinated biphenyls (known as PCBs), chlorinated pesticides and dioxin. Levels of these pollutants in the river appear to be highest near contaminated sites on the shore, known as upland sites. EPA, the Oregon Department of Environmental Quality (DEQ) and other agencies, tribal governments, community groups and private companies are working to investigate and clean up contamination in Portland Harbor. EPA is the lead agency responsible for investigating and cleaning up contaminated sediments in the river itself, while DEQ is the lead agency for investigating and cleaning up contamination on upland sites, working with individual property owners. Both EPA and DEQ coordinate with six Tribal governments and other natural resource trustees.

In June 2016, EPA released its proposed plan for cleaning up the Portland Harbor. The Proposed Plan presents EPA's preferred cleanup option, Alternative I, which according to EPA reduces risks to human health and the environment to acceptable levels by dredging or capping 291 acres of contaminated sediments and 19,472 linear feet of contaminated river bank, followed by 23 years of Monitored Natural Recovery. The preferred alternative also includes disposal of dredged sediment in an on-site confined disposal facility and upland landfills. This alternative will cost approximately \$746 million and take 7 years to complete. The Proposed Plan also describes other alternatives that were considered and the criteria EPA used to compare the alternatives, including estimated costs and construction timelines.

EPA is now accepting public comments on the proposed clean-up plan for the Portland Harbor through September 6, 2016. This time period includes a 30-day extension required by law, as well as an additional 30-day extension, based on requests to EPA for additional time. EPA will respond to all comments that are received during the official public comment period in a Record of Decision that will accompany the final cleanup plan.

PURPOSE

The purpose of this discussion paper is to provide the Board information about the Portland Harbor Superfund Cleanup Plan including a range of positions the Board could use as a framework for public comment. Each position is objectively evaluated against existing Board adopted vision, principle and goal statements for the purpose of identifying the extent to which the position is in alignment with the purpose and mission of the West Multnomah Soil & Water Conservation District (WMSWCD).

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BACKGROUND

The Portland Harbor Superfund Site

In 2000 Portland Harbor was placed on the National Priorities list for hazardous waste cleanup through the Superfund program. The listing was followed by the formation of the Lower Willamette Group, an organization of 10 potentially responsible parties (PRPs), and a Memorandum of Understanding (MOU) among EPA, six Native American tribes, DEQ, and several other natural resource agencies. Upland remediation has been managed by DEQ while remediation within the river itself is managed by EPA. Site studies found over 200 distinct contaminants, of which 64 contaminants are identified to be of concern based on their risk to human and ecological health, listing as a hazardous substance, and relevance to environmental regulations. Some of the most abundant contaminants at the site are PCBs, polycyclic aromatic hydrocarbons (PAHs), dioxins/furans, and pesticides.

Since then, 23 acres of the river have been remediated by EPA and 60% of upland sites have been controlled by DEQ and cooperating PRPs. In June 2016 EPA released a Feasibility Study and Proposed Plan for the site. The plan presents nine alternatives and Alternative I is EPA's preferred alternative. EPA states that its selection of Alternative I is based on an evaluation of national and state water quality standards, risk to humans and wildlife, other impacts on the local community, and other relevant regulations such as those that control hazardous waste disposal.

The Proposed Cleanup Plan

Alternative I has a relatively small active cleanup footprint (13% of the area); 150 acres are proposed for dredging and removal, 17 acres proposed for a combination of dredging and capping, 34 acres are to be capped and an additional 60 acres fall under Enhanced Natural Recovery – for a total cleanup footprint of 291 acres. Enhanced Natural Recovery is accelerating the natural recovery process by adding a thin-layer cover of clean sand over contaminated sediment. EPA believes the alternative addresses 85% of the contaminant risk by targeting areas that would be high-risk if left to natural recovery. Alternative I leaves 88% of the site area to Monitored Natural Recovery which relies on the river's natural sediment transport dynamics to contain, destroy, or reduce the bioavailability or toxicity of contaminants in sediment.

The public comment period for the plan began on June 9, 2016 and will last until September 6, 2016. In addition to accepting comments via mail and online, EPA held four, 9.5-hour long public meetings between June 24th and July 20th, at which spoken and written public comments were accepted.

ANALYSIS

WMSWCD intern Anna Freitas attended one of the EPA hosted public meetings on July 20th at the Ambridge Center; an event venue on NE Martin Luther King Jr. Boulevard, near the Irvington and Lloyd neighborhoods of Northeast Portland. Table 1 displays recurring themes in the public comments and the number of times the theme was mentioned or implied. Similar comments have been expressed in fliers, websites, and related documents, which were analyzed as part of this research. Anna also interviewed one community member who was advocating for a more comprehensive plan on behalf of the Native American Youth and Family Center, and one DEQ employee involved in the Portland Harbor cleanup project. The former interview was intended to deepen understanding of community opposition to the plan. The latter was to investigate whether DEQ identifies any flaws in the plan, and to clarify technical questions about the plan, particularly regarding proposing Alternative I as the preferred plan.

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Table 1: Summary of public comment themes at July 20th public meeting	
COMMON THEMES	INCIDENCE OF THEME
Not enough for wildlife	5
Easy on polluters	14
Want off-site landfill (not Confined Disposal Facility)	4
Not enough area dredged	8
Monitored Natural Recovery not enough	12
Aim to end fish advisory sooner	10
Not enough done for public, takes too long	7
Insufficient control of possible contaminant reentry to river	6
Cultural value of fish/river	7
This is an environmental justice issue	7
Warnings not to recreate in highly polluted areas don't work	4
Public willing to put in work/money to reach better goals	4
Poor communication from EPA and DEQ	5
Need longer comment period	4
<i>Comments were observed from 6:30-8:30pm, amounting to approximately 25 people. Themes that arose more than once within the comments were tallied. Some comments could be categorized as two themes, and many comments included multiple themes. Some themes overlapped and were then lumped into a single category for this table.</i>	

Critiques of the Proposed Plan and Communication of the Cleanup Effort

The Portland Harbor Community Coalition (PHCC), a group of individuals and local organizations impacted by the river cleanup, has voiced strong opposition to Alternative I. Other organizations that have also expressed opposition are the Linnton Neighborhood Association, Groundwork Portland, Right 2 Survive, Native American Youth and Family Center, Wisdom of the Elders, Willamette Riverkeeper and Portland Audubon. Both PHCC publications and public comments emphasize that the plan doesn't adequately reduce the risk to human health, doesn't ensure that job and training opportunities from the cleanup will benefit local workers and the local economy, and doesn't adequately compensate communities impacted negatively by fish advisories and the impact of the cleanup. These emphases are tied to concerns raised by Peter deFur, a consultant hired by the Portland Harbor Community Advisory Group (CAG). CAG was founded in 2002 as a group of local people representing neighborhood associations, environmental professions and groups, health professionals, recreation interests, business groups, and concerned citizens. CAG has worked closely with the relevant government agencies as well as the Lower Willamette Group to facilitate communication between the groups and the public with the goal of reaching a cleanup agreement "that restores, enriches, and protects the environment for fish,

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wildlife, human health, and recreation through community participation.” The Linnton Neighborhood Association also printed a flier with complaints and a summary of Dr. deFur’s concerns.

Public concern that the plan doesn’t adequately protect human health is based primarily on the large area of the site left to natural recovery and on statements within the Feasibility Study. For instance, according to Table 4.3-1, Alternative I does not meet interim targets for risk to human health when in contact with sediment, nor does it fully meet the target for risk to humans or wildlife that consume fish. Risk reduction goals for human consumption of fish are set on three scales: river mile, Sediment Decision Unit (SDU), and site-wide. Alternative I achieves fish consumption risk goals on the SDU scale for infants and children, and on the site-wide scale for infants, but it does not achieve goals for adult consumption of fish on any scale. Alternative G, on the other hand, achieves all risk reduction goals except for risk to humans on a river mile scale.

Fish consumption is a particularly important goal to the community because of its environmental justice implications. People of color, especially Native Americans, and low-income households rely more heavily on fish from the Willamette River for cultural and nutritional purposes. As such, they are disproportionately affected by bio-accumulative contaminants and by the fish consumption advisories.

Perceived flaws with the plan are exacerbated by the low acreage to be addressed by EPA’s chosen alternative. Critics maintain that by choosing a less extensive plan, EPA is reducing costs for the PRPs at the expense of the greater community. The most common theme throughout public testimony was that the plan “goes easy on polluters.” The next most common themes were that Monitored Natural Recovery doesn’t sufficiently reduce contaminants, and that the plan should do more to shorten the fish advisory (Table 1). There were no public comments during the July 20th public comment session in support of Alternative I.

The Underlying Communication Challenge

Although the issue of communication was raised only five times in the public comment session on July 20th, and has not been emphasized in online documents critiquing the plan, insufficient communication of how Alternative I achieves project goals could be a catalyst for the more visible criticisms. EPA’s presentation of the plan and responses to questions were often cursory when explaining how Alternative I reduces risk to humans. The agency’s communications cite the cost and a variety of impacts on the community, such as obstruction of river and road traffic, as reasons for choosing a plan with a shorter timeline and smaller footprint. Furthermore, there is some hesitancy to push a significantly more expensive plan for fear that the PRPs paying for it would resort to litigation. In a follow-up interview, Matt McClincy, DEQ Portland Harbor Project Manager clarified that reducing the area of dredge/cap treatment also reduces impact on benthic ecosystems and immediate risk to humans by reducing the resuspension of contaminants during the cleanup. Other critiques of the plan note addressing insufficient evidence of the effectiveness of natural recovery, earthquake security, and the lengthy time before fish could be consumed without an advisory could assuage public criticism over the proposed plan.

While technical staff at WMSWCD does not have the expertise necessary to determine whether Alternative I is acceptable from a remediation standpoint, the efficacy of EPA’s efforts to inform and involve stakeholders can nonetheless be assessed. It is evident that the Portland community is deeply involved and has the aptitude to follow the analytics of the cleanup alternatives. The community has a

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varying degree of experience analyzing and understanding the type of data involved in these decisions. This is important as some of the EPAs explanations are simultaneously difficult to digest for audiences with little experience analyzing scientific data, and sometimes do not provide enough information for audiences requiring strong evidence through scientific modelling and data analytics. It is important to note that audiences with little experience analyzing scientific data still need more information about that data in order to be convinced of the suitability of an extremely complex decision.

A Theory of Change - a planning and evaluation tool in which long-term goals are linked to preconditions and actions – is used to further assess the communication challenge. In this case, WMSWCD’s mission statement, guiding values, and guiding principles are used to construct the theory of change and inform response to the Portland Harbor Cleanup conflict. Figure 1 displays the results. In spite of multiple presentations and informational resources directed at local audiences, it is apparent that there are weaknesses in the public’s knowledge and understanding of the cleanup issue. As stated in WMSWCD’s guiding values, “our community conserves natural resources when all stakeholders are engaged and welcomed.” In the case of the Portland Harbor cleanup plan, stakeholders cannot be effectively engaged if they are not well informed of the details of the project. Therefore, it is in the WMSWCD’s interests to encourage greater transparency and improved communication methods about the cleanup plan.

In order to analyze this further, a range of position options for commenting on the Portland Harbor Cleanup Plan were evaluated with respect to the following WMSWCD goals, values and principles as stated in the Long-Range Business Plan:

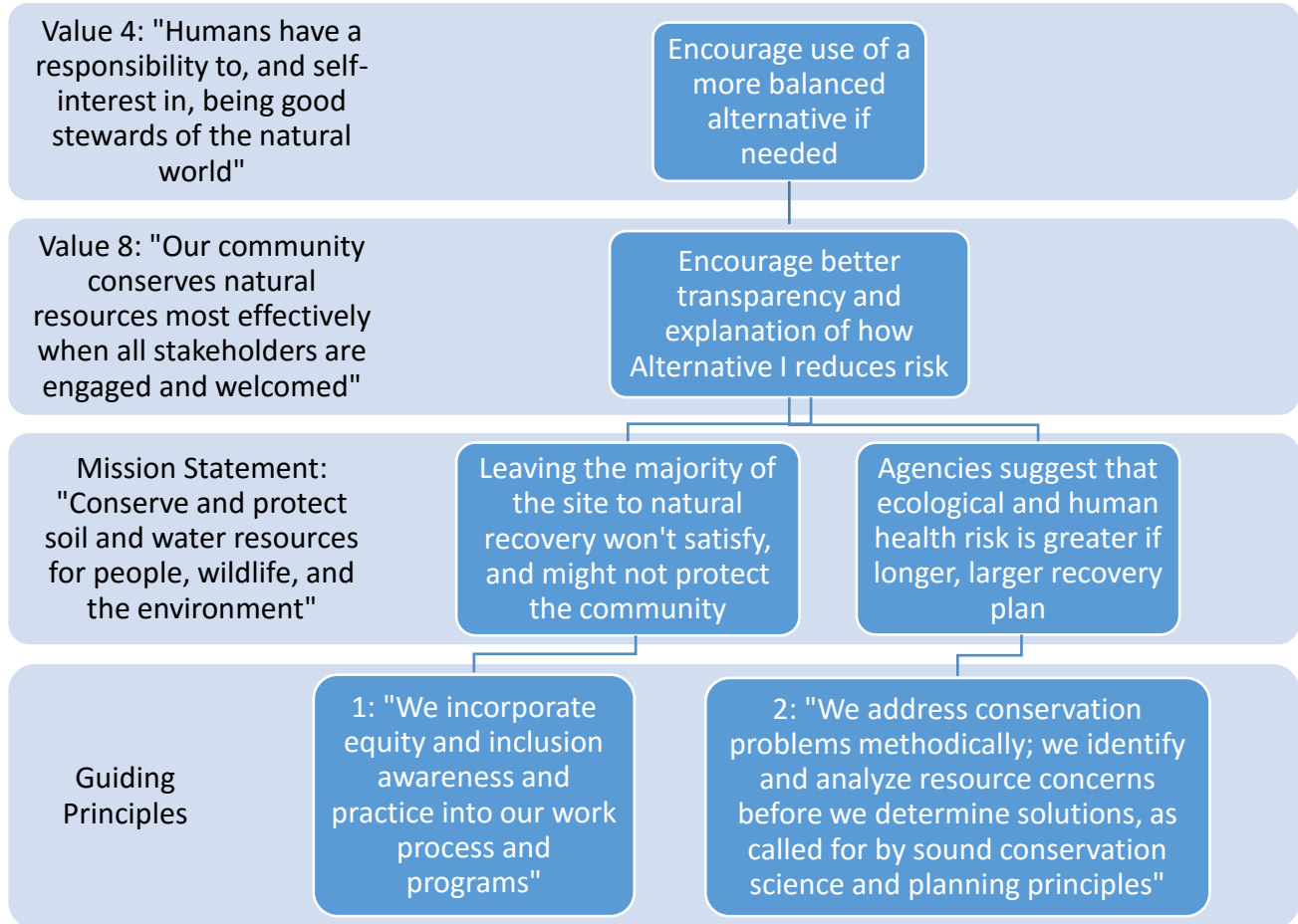
- Our mission statement, “Conserve and protect soil and water resources for people, wildlife, and the environment,”
- Guiding Value 1, “Clean water is vital to people and wildlife,”
- Guiding Value 8, “Our community conserves natural resources most effectively when all stakeholders are engaged and welcomed,” and
- Guiding Principle 2, “We form strategic partnerships to maximize our work and minimize duplication with other agencies.”

Position Options

- A. *No action--remain neutral and uninvolved*
- B. *Submit public comment requesting improvements from EPA, abstaining judgement on Alternative I while noting the community’s concerns. If feasible, commit to becoming more informed and more involved in the issue by attending meetings, coordinating with DEQ and/or EPA, assisting in communication with the community.*
 - a. Pros (+): Contributes a balanced and experienced voice to the public comments with recommendations that could improve EPA’s ability to move forward with the cleanup in a way that is more acceptable to the community. Avoids risk of backlash that is possible from Options A and C.
 - b. Cons (--): Could still be misinterpreted and lead to criticism from the community. Very short timeline—public comment period ends September 6th.

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Figure 1. Theory of Change - Guiding statements and conditions for the Portland Harbor Cleanup



c. Action details:

- i. Note that the District doesn't have the expertise necessary to make a judgement on Alternative I, but that the outcome of this process is very important to the District and constituents.
- ii. Emphasize that better understanding of the plan's merits and details could improve implementation success and acceptance. Neither the District nor the community feels comfortable supporting Alternative I based on available information.
- iii. Based on preliminary investigation of the issue, there is insufficient communication regarding: modeling of natural recovery and evidence of its effectiveness, how the decision was made to prioritize minimization of short-term risks over minimization of long-term risks, how it was determined that the remediation methods will be safe during an earthquake, and how environmental justice issues will be addressed. Also note that the community requests economic benefits from the remediation, such as employment and training opportunities, to go to the local community if feasible.

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- iv. Request renewed communication efforts, financial and technical resources for local groups that can also communicate cleanup project details.
 - v. Request short extension of comment period to enable the district and other stakeholders to become more informed on the plan.
- C. *Write an explanatory article or series of articles for our newsletter/website that carefully refrains from opining on the proposed plan*
- a. Pros (+): Potentially benefits all parties involved by helping address communication gaps.
 - b. Cons (--): Extremely sensitive issue, and writing neutrally is very challenging. Articles could be misinterpreted as supporting EPA's proposed plan, resulting in backlash against the District. This option also requires far more resources from the District than Option B.
 - c. Action details:
 - i. Continue research into the cleanup, increase communication with EPA, DEQ, and other stakeholders. Since EPA is restricting communication with potential interested parties outside of the public comment system, it would be done most effectively after September 6th.
 - ii. The article(s) would very briefly summarize the site history, outline some of the challenges agencies faced when working with such a complex site, and explain some of the science behind remediation technologies. They could also point to other ways to stay informed on the cleanup.
- D. *Submit public comment opposing Alternative I, recommend a more comprehensive plan such as Alternative F or Alternative G (see the summary maps in Appendix A).*
- a. Pros (+): Most likely to have a good outcome with community members, who generally oppose Alternative I. Acknowledging EPA's reasoning behind the shorter timeline and smaller dredge/cap area minimizes potential conflict between EPA and the District.
 - b. Cons (--): The District might not have the expertise to justifiably oppose or support a particular Alternative. Very short timeline.
 - c. Action details:
 - i. Express support for major talking points outlined by community groups such as PHCC and Linnton Neighborhood Association (see Appendix B). Includes highlighting the importance of community acceptance, especially from Native American communities, emphasizing the uncertainty associated with MNR, and encouraging the incorporation of economic benefits such as hiring locally.
 - ii. Although the District is supporting the results-based talking points of community organizations, suggesting an option that moves toward Alternative G but is not necessarily CAG's Alternative G+ would be more prudent and may be more likely to elicit a response from EPA. Alternative F could be a good compromise.

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<i>Table 1. Summary of Options and Implications for WMSWCD Mission, Goals and Values</i>			
<i>OPTION</i>	<i>Mission Statement, Guiding Principle 1</i>	<i>Guiding Value 8</i>	<i>Guiding Principle 2</i>
A. No action	--	--	--
B. Request improvements, abstain judgement on Alt. I	+	+	+
C. Explanatory article(s)	+(--)	+	+(--)
D. Oppose Alt. I	+(--)	+(--)	--

RESULTS

Table 1 summarizes the results of the analysis. Option B seems to be the position most in alignment with WMSWCD mission, values and principles. Option A – remaining neutral and unengaged is not a viable option. Options C and D suffer in that the District would be extending beyond its technical capacity in opposing the preferred alternative and the expertise to suggest a better alternative.

Staff Recommendation

Considering the complexity of the Portland Harbor Superfund Cleanup Plan and the resources available to the District, WMSWCD staff recommends that the Board pursue Option B. While staff does not have the comprehensive technical expertise required to decide whether Alternative I is the right or wrong choice, it does have enough expertise working with local people and resources to support the community's goals and to recommend a more effective communication process. It is clear that the community will not accept Alternative I based on the information readily accessible to them, nor is it clear to District staff whether the Alternative is sufficient. In addition to expressing concerns with flaws in communication and acknowledging the community's concerns, five of six staff members who met to discuss the issue support requesting an extended comment period. Although this may delay implementation of the cleanup, a short extension would allow the District and others to become more informed on the issue in order to more substantially assess the suitability of EPA's preferred alternative.

During this time the District should also assess if and how it can become more informed and more involved in the issue in the future. The Linnton Neighborhood Association calls for coordination between "local, state, and federal authorities" as part of a more comprehensive solution to site cleanup (Appendix B), and the Oregon Health Authority identifies local agencies and nonprofits as important resources in facilitating communication and safe implementation of the cleanup. Furthermore, the Portland Harbor Superfund site is within WMSWCD boundaries, and cleanup is essential to healthy soil and water resources. If the District becomes more informed and more involved in this issue, it could contribute to a more successful cleanup project and greater acceptance by the community.

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SOURCES

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[Young 2016. "Community Groups Oppose the EPA Portland Harbor Cleanup Plan"](#)

INTERVIEW PARTICIPANTS

Roben White, concerned citizen.

Matt McClincy, DEQ Portland Harbor Project Manager

*Researched, analyzed and written by Anna Freitas, Field Intern. Reviewed and vetted by WMSWCD staff.
Edited by Carolyn Myers Lindberg, Communications Coordinator. Final review and compilation by Jim Cathcart, District Manager.*

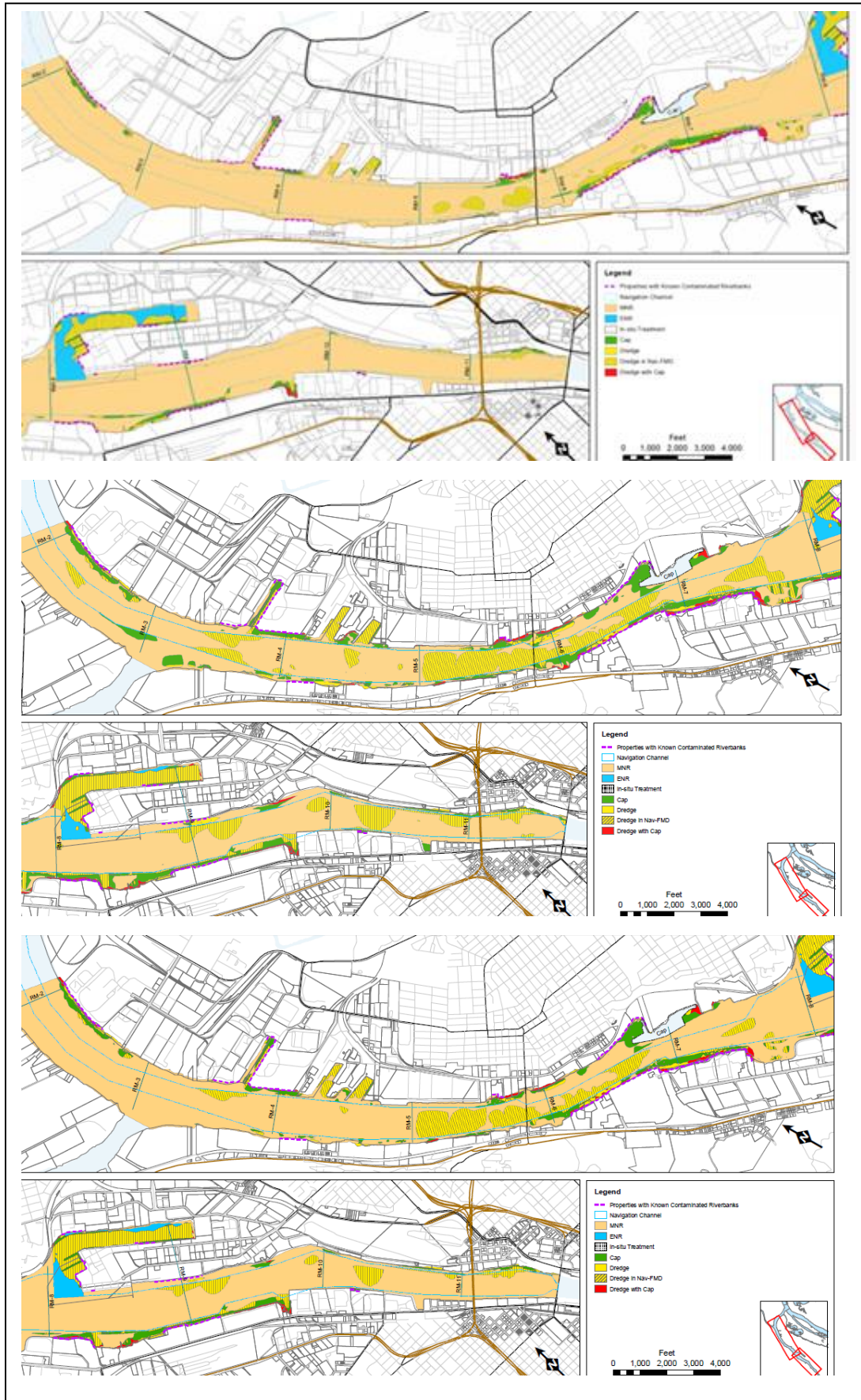
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APPENDIX A

MAP COMPARISON OF THREE ALTERNATIVES FROM PROPOSED CLEANUP PLAN

Figure 2. Maps of how cleanup technologies would be applied to alternatives F, G and I. Yellow areas will be dredged, green areas capped but not dredged.



Alternative F

Area dredged

387.4 acres

Area capped

117.8 acres

Construction time

13 years

Residual HI as Mean of

SDU HIs

3.56

Alternative I

Area dredged

167.1 acres

Area capped

64.1 acres

Construction time

7 years

Residual HI as Mean of

SDU HIs

6.06

Alternative G

Area dredged

571.7 acres

Area capped

184.7 acres

Construction time

19 years

Residual HI as Mean of

SDU HIs

2.13

APPENDIX B
TALKING POINTS USED BY OTHER ORGANIZATIONS FOR COMMENTS ON PROPOSED PLAN

FROM PORTLAND HARBOR COMMUNITY ADVISORY GROUP

“Presentation from Dr. Peter deFur, Environmental Stewardship Concepts

Dr. Peter deFur, technical consultant providing review of the Superfund Proposed Plan for the Portland Harbor Community Advisory Group, at a public forum on Tuesday, June 21st, presented what he sees as issues for the community to pay particular attention to, in our review and for comments to the EPA. Attached is the PowerPoint presentation from Dr. deFur.

Issues of concern in the initial ESC analysis of FS and Proposed Plan, including elements from the 2015 Proposed Plan. 6-21-2016

- Atmospheric release of PCBs is not included in any part of the EPA analysis or Proposed Plan. Recent research confirms that PCBs can be released into the air, that air can be a source of human exposure, and that exposure by inhalation can cause harmful health effects in people.*
- State and Community acceptance is an important component of the final plan, and the state must concur with the remedy. We have no indication that the state is satisfied with the Plan, considering that the state will play a greater role once the remedy is complete. The community has rejected the Plan as inadequate.*
- Tribal consultation and coordination seems to have been mostly, if not solely nominal. There is no indication that the Proposed Plan has been modified to meet the needs of tribes.*
- Emerging technologies- treatment of dredged material is more viable than ever before and needs to be given greater attention in the Plan and FS. Newer treatments are available for riverbank contamination as well.*
- Control of upland and upriver sources is necessary and not complete. The Plan indicates a more pervasive influx of contaminant from the sources on land, many or all of which are uncontrolled. This problem must be remedied with source elimination in the harbor and source control upriver.*
- Contaminants left in river will largely remain for the foreseeable future. PCBs, dioxins/furans, DDx, and metals will not degrade. The Plan leaves a substantial amount of contaminants in the river and we seek an estimate of the mass of chemicals remaining.*
- Confined Disposal Facilities have been opposed by the community since the concept was first raised. The community does not want to have a CDF in perpetuity.*
- Monitored Natural Recovery has not been shown to effectively deal with contaminant that do not degrade, including metals, PCBs and dioxins/furans, among other chemicals. MNR can work on PAHs that can be broken down by bacteria.*
- Time frame for estimated costs needs to be longer, at least 100 years, recognizing that the remedy includes monitoring in perpetuity. EPA also needs to estimate the economic benefits of a clean river, fishing boating, etc.*
- Compliance with all standards, including drinking water and surface water standards (Clean Water Act).*
- Restoration of any lost habitat needs to be a requirement of the final remedy. The Proposed Plan refers to restoration, and this restoration must comprehensively include actions following removal actions.*
- Independent air & water monitoring during the cleanup must be instituted and include baseline data collected as soon as possible.*
- More detailed/site-specific data will be obtained during the design phase and the ROD must be written to require removal that accounts for the data that will be collected.*

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- *Hire locally from the Portland community.*
- *Fish contamination needs to be monitored to assess the changes with time and over space, beginning with a monitoring program now to establish a clear baseline.*
- *Environmental Justice is given little, if any attention, with no identifiable actions to protect communities that have suffered harm as a result of background, ethnicity or race.”*

FROM LINNTON NEIGHBORHOOD ASSOCIATION “MOTION TO ADOPT POSITION ON EPA’S LOWER WILLAMETTE/PORTLAND HARBOR CLEANUP RECOMMENDATION” JULY 6, 2016

- **“Removal of the major portion of contamination by dredging:** the Proposed Plan includes dredging only 150 acres. Our estimate is that to reduce contaminant levels sufficiently would require dredging approximately 1,000 acres of river bottom. Contaminant [sic] should be removed from the river, not simply stored in or next to the river for potential future exposure. Specifically, the Linnton Neighborhood Association rejects the EPA’s Proposed Plan I as inadequate to protect human health. We support plan G with at least 1,000 acres of dredging added or plan H of EPA’s Proposed Plan for the Lower Willamette Superfund site.
- **We oppose a toxic waste dump at Terminal 4 or anywhere adjacent to or in the river:** We along with four other Portland Neighborhood Associations have passed resolutions to that effect. Relocating dredged material into a Confined Disposal Facility (CDF) at Terminal 4 of St. Johns will not survive a future Cascade subduction zone earthquake and will likely pollute the river again.
- **During the time of active cleanup air and water quality monitoring is necessary** to ensure health of workers and adjacent neighborhoods or any neighborhoods affected by construction. We want independent air, water, light and noise monitoring during the cleanup, which includes a quick turnaround of results and timely adjustments made to protect impacted neighborhoods, fish, wildlife, and workers.
- **We must have a cleanup that at the end results in a healthy fish population** so that the current fish consumption advisory on this section of the river from the Oregon Department of Health can be removed. We want the Lower Willamette to be cleaned at least to the same levels of parts per billion (PPB) of contaminants as upriver sources, not including upriver hot spots, in the PPB cleanup standards. Recognizing and reflecting in the PPB cleanup standards that those upriver sources will improve with time.
- **EPA needs to hold the Oregon Department of Environmental Quality accountable to have a plan for source control tank farms re-contaminating the river.** We want the upland sources, particularly the tank farms located in the Linnton/Willbridge area to be controlled to prevent further contamination or recontamination of the river, with specific attention to earthquakes, flooding and climate change.
- **We do not want toxic chemicals spread downriver and eventually to the Columbia River.** We do not want toxic contaminants to remain in the river for the foreseeable future, that further expose humans to atmospheric release of toxic chemicals, such as PCB’s that take nearly forever to break down in the natural environment. New studies show that humans within five miles of a PCB contaminated water body show elevated amounts of PCBs in their body burden because of air deposition. (Dr. David Carpenter’s Study of New Bedford, Mass.)
- **Hold strong to the principle of ‘polluter pays.’** The EPA has identified 150-200 businesses and entities as potentially responsible for the pollution, many of them still in operation—Shell, Exxon Mobil, BP, and Bayer Cropscience. We feel, as mandated by Superfund law, polluters pay for the cleanup and the burden is not shifted to the public taxpayers and ratepayers.
- **All local, state, and federal authorities should coordinate together** on an overall river basin plan to remove pollutant sources and protect the Willamette River for all citizens and wildlife.