



September 6, 2016

Harbor Comments
U.S. Environmental Protection Agency
805 SW Broadway, Suite 500
Portland, Oregon 97205

To Whom It May Concern:

West Multnomah Soil & Water Conservation District (District) has been working with landowners to protect soil and water resources on Sauvie Island for 72 years, and in the rest of Multnomah County west of the Willamette River for 41 years. The Willamette River is an essential resource to our District and its constituents. The purpose of this letter is to formally submit District comment on the U.S. Environmental Protection Agency (EPA) and Oregon Department of Environmental Quality's (DEQ) *Proposed Cleanup Plan for the Portland Harbor Superfund Site* that was released in June 2016. Please note the District is not taking a position on the effectiveness of any of the plan alternatives, including the preferred Alternative I, as we do not have the extensive expertise needed to evaluate whether any particular alternative will be sufficient.

However, we do feel comfortable commenting on the communication that was used to justify the selection of Alternative I as the preferred alternative. In our view, the communication has been insufficient to fully engage stakeholders in the rationale behind choosing Alternative I and as such could impair EPA's and DEQ's ability to successfully implement Alternative I as the clean-up solution to the Portland Harbor Superfund Site.

Our reasoning stems from one of the District's values that guide our conservation work - that natural resources are conserved most effectively when all stakeholders are engaged and welcomed. Based on our investigation of the proposed plan and community responses to it, the District believes that community stakeholders have not been effectively engaged in the development of cleanup plan due to insufficient communication regarding the following questions we as a District have about the preferred alternative:

- What evidence exists showing Monitored Natural Recovery to be sufficient for remediation of the majority of the site area, and how was this natural recovery modeled?
- How the decision was made to prioritize the minimization of short-term risks over the minimization of long-term risks. Alternative I (the preferred alternative) does not meet site wide interim goals for fish consumption, which should be the cleanup plan's goal based on EPA Strategic Objective 3.3 (site-wide ready for anticipated use).

- Whether EPA and DEQ will aim to offer economic benefits from remediation, such as employment and training opportunities, to the local community;
- Whether there is risk of increased toxicity of contaminants due to removal from the river, or risk of atmospheric exposure to contaminants, and how EPA plans to mitigate this risk. Reduction of short-term risk from sediment resuspension appears to be a reason for EPA favoring Alternative I, yet this reasoning is not well explained or supported by evidence readily available to the public;
- How it was determined that the remediation methods will contain contaminants safely during an earthquake;
- How environmental justice issues – specifically how people of color, Native Americans, low-income households and others disproportionately affected by bio-accumulative contaminants and by continued fish consumption advisories due to their reliance on fish from the Willamette River for cultural and nutritional purposes – will be addressed.

According to our review, EPA’s 2014-2018 Strategic Plan states that “EPA is enhancing its engagement with local communities and stakeholders so that they may meaningfully participate in decisions on land cleanup.” We recognize and appreciate EPA’s efforts, but they have not been enough for stakeholders in the Portland Harbor Cleanup. We therefore request that EPA renew communication efforts to gain broader community and stakeholder support prior to making a final decision on the cleanup plan.

The District’s constituents have the motivation and capacity to critique cleanup plans, and it is clear that they will not be comfortable with the preferred alternative until the types of questions we reference in this letter are addressed with greater transparency and communication approaches that make information understandable. Improved understanding of the plan’s details and merits among concerned community members would improve cleanup implementation and acceptance. In this regard, we request that EPA and DEQ provide financial and technical resources to local organizations that are better equipped to directly engage local stakeholders about the merits and justification of the cleanup plan. The District stands ready to assist these organizations in their efforts.

We look forward to seeing how EPA and DEQ respond to community concerns in order to pursue our mutual goals of protecting natural resources while ensuring that, as the EPA Mission states “all parts of society... have access to accurate information sufficient to effectively participate in managing human health and environmental risks.”

Please contact Jim Cathcart, District Manager; (503) 238-4775, ext. 106 (jim@wmswcd.org) if you have questions regarding this.

Thank you,



Terri Preeg Riggsby
Board Chair and Zone 5 Director
West Multnomah Soil & Water Conservation District

cc: West Multnomah Soil & Water Conservation District Board of Directors, Oregon Department of Environmental Quality, East Multnomah Soil & Water Conservation District