

Name * Doug Larson

Portland Community Advisory Group

Oregon DEQ

Attention: Erin McDonnell

Willamette Cove is presently posted "No Trespassing" because of harmful toxins in the soil. Shipyards and industrial activities have left a legacy of unregulated waste disposal along the banks of the river. All the while, people have been drawn to water as a means to reconnect with the natural world. This cove represents one of the few opportunities for the residents of North Portland to access the tranquility and flow of an open river as it passes through their neighborhoods.

Located just upriver from Willamette Cove, the cleanup of a creosote plant on the McCormick and Baxter property offers a cautionary tale of what not to do in this instance. An inhospitable bare field fenced off from the public gives testimony to misguided priorities. Economies in the ecological remedy have benefited no one. The remaining lake of creosote beneath the surface restricts use of the property. The owner couldn't afford the cost of removing it and the Public hasn't benefited from paying a discounted price.

DEQ's proposed remedy for Willamette Cove would revisit the compromises at McCormick and Baxter. Some of the worst toxins will be trucked away and the rest will be scraped into a pile and left on site. Again, money is saved and the future choices and health are compromised.

Metro is the present owner of the property known as Willamette Cove. At a recent work-session, the Metro Council recognized that a full cleanup of the property was a foundational requirement for the unrestricted future use of the property, whatever that may be. Within the meeting, their enthusiasm led to conjecture of which funds may be available to supplement their share of a full cleanup. The caveat is that DEQ controls how the property may be used through their control of the cleanup. This brings us to the present moment. DEQ has agreed to take and consider public comment. The Port of Portland once operated a shipyard on the site. In recognition of their responsibility for the consequences of that activity, they have negotiated a 90-10 split of the remediation costs with the present owner, Metro. Metro has indicated a willingness to go beyond their share to achieve a full cleanup. This is thought to be in the neighborhood of an extra million dollars, or the cost of a few houses in this current market. The difference between the two proposals is the concentrated pile of contaminated soil left on site. What is scraped up will be replaced with clean soil brought in by trucks. Alternatively, the money spent to engineer, build and maintain this capped waste in perpetuity might be used to reload empty trucks with contaminated soil and return them to an accredited disposal site within the metro area. This needn't increase traffic through the neighborhood significantly. The benefit of this inconvenience might be new community parkland along the riverfront.

Lastly, the Superfund program came into being as a means of addressing social justice issues created by industrial pollution. Within the boundaries of the Willamette Superfund designation DEQ is indicating that the proposed cleanup is good enough. By contrast, when the South Waterfront was cleaned up and developed, The City of Portland undertook the contractual costs allocated to the developer and delivered a pristine environment. Social justice? The communal vulnerability exploited by industrial pollution deserves a better outcome in North Portland.

Thank you for your consideration.

Michael Pouncil, Chair

Doug Larson, Board Member

Sarah Taylor, Board Member