



October 9, 2019

Honorable Governor Brown
Office of the Governor
900 Court Street NE, Suite 254
Salem, OR 97301-4047

Honorable Governor Jay Inslee
Office of the Governor
PO Box 40002
Olympia, WA 98504-0002

Director Maia Bellon
Washington Dept. of Ecology
PO Box 47600
Olympia, WA 98504-7600

Director Richard Whitman
Oregon Dept. of Environmental Quality
700 NE Multnomah Street, Suite 600
Portland, OR 97232-4100

RE: Support for Bradford Island Cleanup Area Superfund Listing

Dear Honorable Governors Brown and Inslee and Directors Bellon and Whitman,

The undersigned public health, environmental justice, and conservation organizations strongly support the states of Oregon and Washington in requesting that the U.S. Environmental Protection Agency (EPA) list the Bradford Island cleanup site on the National Priorities List (NPL) pursuant to Section 105(a)(8)(B) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 U.S.C. § 9605(a)(8)(B), and the relevant provisions of the National Contingency Plan (NCP), 40 CFR Part 300. For over 40 years, the U.S. government dumped toxic pollution in and along the Columbia's shores at Bradford Island,

located near Bonneville Dam. The area is a historical tribal fishing area. Today, tribal people and diverse communities use the area for subsistence and recreational fishing despite advisories warning not to eat resident fish. In fact, resident fish caught near the island contain the highest levels of cancer-causing PCBs in the Northwest. Despite the significant contamination, the Trump administration recently slashed funding for Bradford Island cleanup. Given the severe and long-running pollution problems caused by the Corps, our organizations support a new approach to Bradford Island cleanup: NPL listing.

Decades of pollution—and languishing cleanup—threatens people’s health, fish, and wildlife. Since the late 1990s, the U.S. Army Corps of Engineers (Corps) and the Oregon Department of Environmental Quality (DEQ) have had a voluntary cleanup agreement to evaluate and cleanup various sources of contaminants on the island. Yet, the Corps has not engaged in new cleanup since 2007 when the federal agency removed PCB-laden sediments from the river. Subsequent reports and sampling concluded that PCB concentrations in resident fish remain extremely high. The area is also contaminated with lead, mercury, and petroleum chemicals. The history of cleanup investigations, lack of funding, and delays in developing plans for active cleanup demonstrate the dire need for a new approach.

Studies by EPA, the Columbia River Inter-Tribal Fish Commission, Oregon, Washington, and other agencies and entities demonstrate that pollution in the Columbia River has a disproportionate impact on people of color. For example, studies show that Native Americans in the Columbia River Basin eat significantly more locally-caught fish and shellfish than non-tribal members. According to Oregon and Washington’s environmental agencies, recreational fishers may consume more fish than the general population, and some population groups consume especially large amounts of fish and shellfish as part of traditionally influenced diets, including Native Americans and Asian and Pacific Islanders. In short, Bradford Island pollution, and the Corps’ failure to promptly address the problem, is a pressing environmental justice issue that demands action. Under CERCLA, an NPL listing is the critically-needed step to facilitate funding and accountability for the cleanup.

For the reasons described above, we urge the states of Oregon and Washington to request an NPL listing based on the well-documented pollution at and around Bradford Island, coupled with the area’s extensive use by subsistence and recreational fishers. Thank you in advance for considering our organization’s input on this important public health and environmental issue.

Sincerely,

Lauren Goldberg
Legal & Program Director
Columbia Riverkeeper

Damon Motz-Storey
Healthy Climate Program Director
Oregon Physicians for Social Responsibility

Bob Sallinger
Conservation Director
Audubon Society of Portland

Michael Lang
Conservation Director
Friends of the Columbia Gorge

Rhett Lawrence
Conservation Director
Oregon Chapter of the Sierra Club

Mark Riskedahl
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Northwest Environmental Defense Center

Nina Bell
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Northwest Environmental Advocates

Cassie Cohen
Executive Director
Portland Harbor Community Coalition

Jesse Piedfort
Chapter Director
Sierra Club Washington State Chapter

cc:

Jamie Pinkham, Columbia River Inter-Tribal Fish Commission
Phil Rigdon, Yakama Nation Fisheries
Robert "Bobby" Bruno, Confederated Tribes of Warm Springs Indian Reservation
Eric Quaempts, Confederated Tribes of Umatilla Indian Reservation
Aaron Miles, Nez Perce Tribe
Representative Earl Blumenhauer
Representative Greg Walden
Senator Ron Wyden
Senator Jeff Merkly
Representative Jaime Herrera Beutler
Senator Maria Cantwell
Senator Patty Murray
Leah Feldon, Oregon Department of Environmental Quality
Polly Zehm, Washington Department of Ecology
Jason Miner, State of Oregon Office of the Governor
JT Austin, State of Washington Office of the Governor