



June 9, 2021

Honorable Senator Ron Wyden  
221 Dirksen Senate Office Building  
Washington, DC 20510

Honorable Senator Jeff Merkley  
313 Hart Senate Office Building  
Washington, DC 20510

Honorable Senator Maria Cantwell  
511 Hart Senate Office Building  
Washington, DC 20510

Honorable Senator Patty Murray  
154 Russell Senate Office Building  
Washington, DC 20510

Representative Jaime Herrera Beutler  
2352 Rayburn House Office Building  
Washington, DC 20515

Representative Earl Blumenauer  
1111 Longworth House Office Building  
Washington, DC 20515

Administrator Michael S. Regan  
Environmental Protection Agency  
Office of the Administrator- 1101A  
1200 Pennsylvania Ave, N.W.  
Washington, DC 20460

Acting Administrator Michelle Pirzadeh  
Environmental Protection Agency  
Region 10  
1200 Sixth Avenue  
Seattle, WA 98101

## **RE: Support for Superfund Listing on Columbia River at and around Bradford Island**

Dear Honorable Senators Wyden, Merkley, Cantwell and Murray, Representatives Herrera Beutler and Blumenauer, Administrator Regan and Acting Administrator Pirzadeh,

The undersigned public health, environmental justice, and conservation organizations strongly support the Confederated Tribes and Bands of the Yakama Nation (Yakama Nation) and the states of Oregon and Washington in requesting that the U.S. Environmental Protection Agency (EPA) list Bradford Island and surrounding waters of the Columbia River 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 River shores at Bradford Island, located near Bonneville Dam. Indigenous people have utilized the area since time immemorial. Today, Indigenous 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, under the Trump administration, the U.S. Army Corps of Engineers (Corps) slashed funding for Bradford Island cleanup and initiated a lawsuit against the State of Oregon to recover payments pursuant to a multi-year voluntary cleanup agreement. 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. From the late 1990s to 2019, the Corps and the Oregon Department of Environmental Quality (DEQ) had a voluntary cleanup agreement to evaluate and clean up 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 and equipment from the river. Subsequent reports and sampling concluded that PCB concentrations in resident fish remain extremely high. In fact, resident fish caught near Bradford Island contain the highest levels of PCBs recorded in the Pacific Northwest. 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 Black, Indigenous, and 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.

Over the years, Bradford Island cleanup has drawn numerous advocates and supporters. For example, in 2019, the Seattle Times and The Columbian Editorial boards announced their recommendation to list Bradford Island and surrounding waters on the NPL. In February 2021, the Yakama Nation, DEQ, and Washington Department of Ecology sent a letter requesting that EPA add the Bradford Island site to the NPL. The letter outlines the enduring risks that Bradford Island poses to people and the environment, and addresses the Corps' inaction on the cleanup of contaminants. The Trump administration failed to list the site in 2020. Based on the Biden administration's commitments to environmental justice and trust responsibilities to Tribal Nations, our organizations are renewing our request to the EPA to prioritize the Bradford Island site for NPL listing.

In sum, we urge Members of Congress to support NPL listing for Bradford Island and surrounding waters based on the well-documented pollution at and around the island, coupled with the extensive use of this area by subsistence and recreational fishers. Thank you in advance for considering our organizations' input on this important public health and environmental issue.

Sincerely,

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Columbia Riverkeeper

Cassie Cohen  
Executive Director  
Portland Harbor Community Coalition

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Jamie Pang  
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