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***Statement by Curtis Robinhold, Port of Portland deputy executive director, regarding initial response to the EPA Proposed Plan for the cleanup of the Portland Harbor Superfund site***

Today we sent a letter to U.S. Environmental Protection Agency Region 10 Administrator Dennis McLerran about EPA's recently released Feasibility Study and Proposed Plan to clean up the Portland Harbor Superfund site. The letter represents our initial response to the plan and the underlying Feasibility Study upon which the plan is built, and highlights our fundamental concerns with EPA's approach. We intend to submit more extensive comments later in the 60 day public comment period.

We are committed to a cleanup of Portland Harbor that protects the health of Portlanders and our environment, and to finding the most cost-effective way to achieve it. After studying the river, and doing our own early cleanup work, we are ready for the next step.

In our letter, we ask EPA for a pathway to get the cleanup moving forward. We make three main points about EPA's analysis and resulting plan:

(1) The plan does not adequately inform Portlanders about the true costs and benefits of different cleanup options. While we were intrigued by the more than \$600 million drop in the cost of EPA's preferred remedy, a closer look left us perplexed. Costs dropped, but there was little actual change in the plan for cleanup. We are concerned that EPA's costs are overly optimistic, meaning the public is not informed about the true higher anticipated cost of the cleanup or the benefits that different cleanup alternatives would achieve. The cost to clean up Portland Harbor is significant at a time when our city and region are facing many critical affordability issues.

(2) Cleanup goals should be realistic. The Portland Harbor Superfund site is very large, covering 10 miles of the Lower Willamette River. It is the home to Oregon's largest seaport, directly employing 30,000 people, in addition to being a home for wildlife and recreation. EPA sets its cleanup targets for the entire site, rather than recognizing that the risks aren't the same across

all 10 miles. Cleanup goals should be more site-specific, so we ensure they are actually effective and achievable in an urban waterway.

(3) EPA should empower us with the flexibility to get cleanup moving forward. We have been very active in addressing the legacy contamination in Portland Harbor and believe we can implement cleanups that will reach EPA's pollution reduction targets and do it in a cost-effective way. In order to do that, EPA must provide us the flexibility to pursue other, equally protective approaches at our key sites within the Harbor.

We have repeatedly expressed these key concerns to EPA, and urge EPA to find a way to work through these issues in making its final cleanup decision. We urge Portlanders to also share these thoughts with EPA during the public comment period.

Under an agreement reached with EPA in January, we are entitled to file a formal dispute about our concerns with the Feasibility Study. We chose instead to address our concerns in the letter rather than invoking legal dispute.

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