

From: [Bob Sallinger](#)
To: [PENCE Holly](#)
Subject: Audubon Comments on PO Bar BUD
Date: Monday, April 18, 2011 10:04:57 AM
Attachments: [4-17-11 Audubon Comments on PO Bar BUD Reconsideration.doc](#)

Dear Holly,
Please accept the attached comments from Audubon Society of Portland regarding the Post Office Bar BUD.

Thanks,

Bob

Bob Sallinger
Conservation Director
Audubon Society of Portland
5151 NW Cornell Road
Portland, OR 97210

(503) 292-9501 ext. 110

Help Save West Hayden Island Wildlife Area! Hundreds of acres of forest, meadow and wetlands at risk of being converted to parking lots! Go to <http://www.facebook.com/home.php?#!/pages/Save-West-Hayden-Island/136664296349832?ref=ts>



April 17, 2011

West Hayden Island Beneficial Use Determination Comments
c/o Holly Pence
Solid Waste Permit Coordinator
DEQ Northwest Region
2020 SW 4th Ave., Suite 400
Portland, OR 97201

Dear Ms. Pence,

Please accept the following comments from the Audubon Society of Portland regarding the Beneficial Use Determination for disposing 75,000 cubic yards of contaminated materials from Post Office Bar at West Hayden Island. We appreciate DEQ's decision to reconsider this decision. As per our testimony at the public meetings on Janzen Beach, we would urge to DEQ consider the following:

1. **Under OAR 340-093-0280(2)(a) there must be "an identified or reasonably likely use for the material that is not speculative."** (emphasis added). The proposed use described by the Port of Portland in its Beneficial Use Application (7-1-10) reads in its entirety "Fill material to increase site grade elevation prior to future development at West Hayden Island." Correspondingly, the Beneficial Use Determination issued by DEQ (7-8-10) states, "The use is as fill material to increase site grade prior to future development of the property." This "beneficial" use is in fact highly speculative. The property is not currently zoned for industrial development and there are no assurances that it will ever be zoned or permitted for this purpose in the future. The City has repeatedly emphasized that all options remain on the table with regards to West Hayden Island including a "no build option."

The West Hayden Island Resolution adopted by City Council on July 29, 2011 read in part as follows:

"BE IT FURTHER RESOLVED, this resolution sets forth the City Council's preliminary intentions and interim directions to the Bureau of Planning and Sustainability, based on the information available at this time, and nothing in this resolution constitutes a final decision concerning any land use planning action with respect to West Hayden Island. The City Council intends that any land use planning actions for West Hayden Island will be adopted in the future as required by the statewide planning goals, state law, the City's comprehensive plan, and the

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City's zoning code and may include the adoption of an annexation ordinance, zoning designations and a Plan District".

In a letter dated September 17, 2010 from Portland Mayor Sam Adams to Port Director Bill Wyatt regarding the Beneficial Use Determination, the Mayor wrote the following:

That said, I do believe that the timing of the beneficial use permit application was unfortunate, relative to the City Council's recent hearing. Although regional decisions have designated portions of the site for future industrial development, I have been clear that all options should be on the table. In that context, the land use assumptions stated by the Port in the beneficial use application (that future industrial development is a given) outcome behind closed doors. That was not the case, and I do not wish to convey that impression.

Under these circumstances and based on the common understanding of the term "speculative," we do not believe that the basis for approving placement of contaminated dredge materials on West Hayden Island can be considered anything other than speculative. DEQ staff have verbally stated that the agency intended a more narrow definition of the term "speculative" than common understanding would allow, specifically focusing on farmers who stockpile junk in their yards with no identified future use. However this narrow definition was never articulated in code. furthermore we question whether placing contaminated materials on West Hayden Island for the purpose of filling the island for future development for which the land is not currently zoned is any less speculative than storing "junk" in the hopes that it one day will have commercial value. We do not believe that A BUD would have been issued if in fact DEQ had considered existing rather than speculative zoning. Nor do we believe it would it have been issued if other equally plausible future use scenarios such as protection as a park or natural area been considered.

2. **Under OAR340-093-0290(9)(a) The Department may modify or revoke a case-specific beneficial use determination or a demonstration project authorization if it determines that the application includes a material misrepresentation or false statement.** The Post Office Bar Applications contains a significant material misrepresentation of fact. The application states, "The use is as fill material to increase site grade prior to future development of the property." Later it states, "Upon development of the area, the site will likely be covered with landscaping or hardscaping..." The DEQ BUD is replete with restatements of this inaccuracy. For example. In a letter dated, June 24, 2010, DEQ writes, "*The Port of Portland has indicated to DEQ in the application and in past meetings that a large volume of fill material is needed to meet the future development objectives for this location....*" In the Post Office Bar BUD dated July 8., 2010 DEQ writes, "*DEQ understands that the Port of Portland intends to develop the property for commercial or industrial use.*" Both the Port application and the BUD fail to recognize that this future use is speculative and represents misrepresentation by omission.

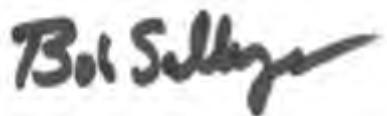
- 3. The placement of the dredge materials on West Hayden Island would violate 340-093-0270 (1)(d) by increasing hazardous substances in a "sensitive environment."** West Hayden Island is captured under the State's definition of a "sensitive environment" under OAR 340-122-0115(50) an identified Goal 5 resource site.
- 4. The wildlife usage of the grasslands on which the dredge materials would be dumped has been significantly underestimated:** EA and Biop underestimate vegetation and wildlife use at the site. Except during active disposal periods, the dredge deposit areas are partially covered and surrounded with native and non-native vegetation and are frequented by a wide array of birds of prey (including recently delisted bald eagles), passerines, waterfowl, shorebirds, mammals and amphibians. Recent City of Portland Wildlife Surveys at the dredge material site confirm usage of a wide array of avian wildlife species including species of concern such as western meadowlarks. In addition, a pair of bald eagles have been constructing a nest at the Northwest end of the dredge deposit area (personal observation). Finally the dredge deposit area is creating an attractive nuisance by creating a ponded area which has been drawing a large array of wildlife including passerines, shorebirds, waterfowl, amphibians and a variety of mammals (personal observation). We would encourage DEQ to reconsider the BU determination in light of the updated wildlife data. Specifically we would ask DEQ to consider the following:
 - a. Obtain wildlife survey data from City of Portland Bureau of Environmental Services and consult with USFWS and ODFW regarding potential impacts on species utilizing the area;
 - b. Consult with US Fish and Wildlife Service regarding bald eagles and specifically applicable protective measures that may be required under the Bald and Golden Eagle Protection Act.
 - c. Evaluate whether the uncovered placement of these materials in manner that creates ponding and allows direct exposure by wildlife and creates an attractive nuisance and unnecessary exposure that could be prevented by capping at the time of disposal
- 5. We are concerned about the uncapped state of the contaminated T-5 materials.** We have been repeatedly assured that DEQ expected these more highly contaminated materials to be covered by the PO Bar dredge materials. At the April 12, 2011 hearing diagrams appeared to indicate that in fact the PO Bar Materials are being placed elsewhere and that the T-5 materials will remain exposed. The confusion between DEQ and the Port on this fundamental issue undermines public confidence that this process has in fact been carefully considered. Audubon believes that the BUD that resulted in placement of T-5 materials on WHI contains the same basic flaws as the PO Bar BUD and that those materials should be removed from WHI. The confusion over capping of these materials only heightens our concerns.

6. **The community continues to have concerns regarding potential health and safety impacts to humans:** It was clear at the public hearings that the local community continues to have public health and safety concerns about the materials already places and proposed for placement on West Hayden Island. The process to date has severely undermined community confidence in these decisions---to many aspects of this process come across as post hoc rationalizations rather than rigorous pre-decisional analysis. we believe the T-5 and PO Bar Process call into question whether the new BUD process is adequate to protect our communities and the environment. We would encourage DEQ to engage in a full review of the BUD process to determine whether it is indeed rigorous, transparent and sufficient.
7. **Reinitiating Consultation with NOAA Fisheries:** It is our understanding that NOAA Fisheries verbally encouraged the USACOE to reinitiate consultation over potential impacts to listed salmonid species due to potential return of contaminants to the river via groundwater. We are concerned that the USACOE has failed to date to reinitiated consultation. We do not believe that the BUD should be reissued until this issue is fully resolved.

In conclusion, we would urge DEQ to deny the BUD for placement of contaminated dredge materials on West Hayden Island for the purpose of preparing this island for future development---an uncertain outcome that meets any common understanding of the term "speculative." We believe the interests of the community and the environment would best be served by suspending placement of dredge materials on WHI until Portland City Council makes a final determination regarding annexation and rezoning of the island (expected in December 2011) and places conditions on the island to achieve desired future conditions for economic, recreational, social and environmental objectives. Alternative disposal sites do exist and we would request that DEQ and the Port of Portland utilize these opportunities and respect the public process to determine the future of West Hayden Island which is currently underway.

Thank you for your consideration of these comments.

Respectfully,



Bob Sallinger
Conservation Director

From: [Audrey Gurule](#)
To: [PENCE Holly](#)
Subject: Letter attached from Columbia River Steamship Operators Association
Date: Monday, April 18, 2011 3:30:26 PM
Attachments: [04-17-11 PofP WHI Beneficial Use Letter.pdf](#)

Good afternoon Ms. Pence,

Please see the attached letter from the CRSOA.

Thank you,

Audrey Gurule
Columbia River Steamship Operator's Association
360-901-8144
admin@crsoa.net
www.crsoa.net



Columbia River Steamship Operators Association

200 SW Market St, Suite 190
Portland, OR 97201
503-939-7854

April 18, 2011

Holly Pence
Solid Waste Permit Coordinator
Department of Environmental Quality
2120 SW 4th Ave, Suite 400
Portland, OR 97201

Dear Ms. Pence,

The Columbia River Steamship Operators Association is an 89 year-old non profit association of ship owners, operators, agents and towing company's. The Association's mission is to facilitate trade, provide business leadership, exercise principles of environmental stewardship, serve as an industry focal point, and promote operating policies and practices that are safe, reliable, efficient, and cost-effective.

Our Association plays an important role in moving billions of dollars of commerce through our river system each year, in supporting tens of thousands of jobs in the region, and in sustaining and improving environmentally responsible programs throughout Oregon's waterways and coastal port areas. Given our mission and history, we have a keen interest in ensuring that our harbors and channels are routinely dredged in a timely manner to ensure safe navigation on our rivers.

Dredging is a critical component of any maritime transportation system. It is particularly important for our river system where the length of many ships exceeds the 600 foot width of the Columbia River channel. The Columbia is a powerful river and the underwater currents continuously shift the sands creating humps and hydrostatic pressures that are carefully monitored by our licensed maritime pilots. Without routine dredging, the risk of accidental vessel groundings increases. Periodic dredging is therefore essential for eliminating these potential hazards to safe navigation and to ensure that ships calling Oregon ports move timely and reliably through the navigation system.

Dredging cannot occur without approved dredge placement areas, like the West Hayden Island placement site. It is our understanding that this particular site has been used for many years by the Port of Portland, and for good reason. Sites like this are essential in order to keep our region competitive in the international market and to preserve the resulting revenue streams that support Oregon's economy and its exemplary maritime environmental safety and emergency management programs.

Post Office Bar is a particularly challenging area and dredging there becomes increasingly important as larger ships make use of our newly deepened channel. The importance of the West Hayden Island placement site is more important now than ever and will become increasingly so as these new ships come to carry Oregon commerce.

When DEQ initially granted the Port of Portland a beneficial use determination allowing use of dredged sediments from Post Office Bar in the Willamette River it was only after thorough review and testing of the material. We understand that not only DEQ but several other regulatory agencies reviewed laboratory analytical data for the sediments to ensure contaminant concentrations are below levels of concern for people and animals. The results of this rigorous testing and thorough review should give all stakeholders absolute confidence in the safety and efficacy of the site's proposed continued use.

For these reasons, we strongly recommend that DEQ reissue the Beneficial Use Determination to the Port of Portland for sediment disposal on West Hayden Island.

Thank you for your consideration.
Sincerely,

Jim Townley
Executive Director
Columbia River Steamship Operators Association

From: [Evans, Walter](#)
To: [PENCE Holly](#)
Subject: Post Office Bar Dredged Materials Placement
Date: Monday, April 18, 2011 2:57:06 PM
Attachments: [7354503_1.DOC](#)
[7374891_1.DOC](#)

<<7354503_1.DOC>> <<7374891_1.DOC>>

I attach a written statement about placement of Post Office Bar dredged materials, along with an attachment (newsletter fr Portland Mayor Sam Adams).

Thank you for the opportunity to submit comments on this matter.
Walt Evans

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OREGON DEQ TESTIMONY: DREDGED MATERIAL PLACEMENT AT WEST HAYDEN ISLAND DISPOSAL SITE

April 12, 2011

Thank you for the opportunity to provide comments at this Oregon DEQ hearing about placing sediment from the Willamette River's Post Office Bar at the West Hayden Island sediment placement facility.

I am Walt Evans, a lawyer at Schwabe Williamson & Wyatt. I testify this evening representing Pacific Northwest International Trade Association, our region's leading advocacy group supporting the benefits of increasing international trade and for the family wage jobs that trade provides. I chair the PNITA Trade Policy Committee, and, as is true for all of us members active at PNITA, it is a volunteer effort. With your permission, I will offer a few comments this evening, and provide more detailed written comments to the Commission later.

First, I support placement of sediment from Post Office Bar at the West Hayden Island sediment placement facility. It is an important element in helping Portland develop and keep family wage jobs linked to international trade.

Others testifying this evening will address the environmental and technical adequacy of this beneficial use determination issued to the Port of Portland for placing dredged sediment at the West Hayden Island Placement Facility. My comments address it from a broader context.

I also should state for the record that I do legal work for a number of Ports in the Pacific Northwest, up and down the Columbia-Snake system, and along the Oregon coast—but I do no work for the Port of Portland. Representing Ports, though, reinforces my understanding of and commitment to expanding international trade throughout our region. Within a few yards from the site of this hearing, the Columbia and Snake rivers provide an integrated water transportation system. Cargo can be put on a barge at the Ports of Lewiston, Idaho, or Pasco, Washington, or Umatilla or Morrow in Oregon, as examples, for delivery downriver by the most energy efficient and most environmentally benign way to move goods—by barge—and be delivered to one of the Lower Columbia Ports for export into global markets. I'll repeat that: it's the most energy efficient and most environmentally benign: goods move farther on a gallon of fuel with less environmental impact than goods that move by train or truck.

Strengthening Oregon's position as a state whose jobs are linked to international trade is a cornerstone of the economic development visions of Oregon's Governor John Kitzhaber and Portland Mayor Sam Adams. Our state is among those states where trade related goods and services provide more jobs per capita than most other states. A short quote from a recent newsletter from Portland Mayor Sam Adams supports Portland's future as a growing international trade center. The topic sentence of the Mayor's two-page letter to his constituents summarizes the importance of international trade today to our city, and why its growth is critical to our city's future. Mayor Adams said simply but clearly, "Our economy is tied to global markets."¹ I agree wholeheartedly. The Mayor described in this newsletter—which I attach as a part of my testimony—his visits to foreign business centers to sell Portland as a place for them to do business, and as a place they should come to buy the goods and services in sectors where we are strong and are most globally competitive.

I have heard some critics say that Portland is limited as a future international trade centered city, due to the distance up the Columbia to our docks, and the fact that larger ports already exist on the West Coast at LA-Long Beach, Tacoma and elsewhere. We know that Portland has a profitable niche, so goods and services we can export (and import) are tailored for our size and location. Two freeways and two Class A railroads, availability of inland barge container and cargo shipping and available land all combine to position Portland for a bright future in international trade.

As an aside, due in part to the recent deepening of the Columbia River channel from 40 to 43 feet, the Port of Longview already has seen a state-of-the-art grain exporting facility built on its property—the first grain elevator built in the last 25 years at a Western US port. The cost of this facility is \$200 million—money spent in Cowlitz County on local labor and supplies, as well as spent elsewhere in our region and across the US. The Port of Vancouver is in discussions with BHP Billiton, the world's largest diversified natural resources company, examining the potential location of a potash export facility at the Port's Terminal 5. The Port and BHP Billiton have reached preliminary agreement to proceed and are working to finalize terms and a lease agreement. The project would include handling, storage, dock and rail facilities for potash export originating at BHP Billiton's first mine developed in Canada's Saskatchewan Basin. Potash is a natural mineral fertilizer in demand overseas that improves crop yields.

These two examples of economic decisions were made even before the newly deepened channel was put into use, and they signal how we hope such investments will benefit the people of Oregon and SW Washington—and also benefit shippers whose goods arrive here from as faraway as the Midwest for export to international markets via the Columbia Snake river system.

Adequate dredging for safety and to increase the efficiency with which vessels can move to docks and terminals at the Port of Portland is important for the future competitiveness of this Port—or any Port. Keeping channels dredged for safety is paramount. Ports also should want to help our exporters by making cargo transportation more efficient—and a properly dredged harbor is a cornerstone element of local transportation efficiencies.

¹ Mayor Sam Adams' Newsletter of April 8, 2011, titled "*Our Economy is Tied to Global Markets: A Report on Our International Trade and Investment Strategies*" is attached and made a part of this testimony.

For a quick reminder of how and why US goods become competitive in Asia or elsewhere includes the three elements that make up international competitiveness. These three ingredients impact the outlook for export success for local Oregon or Washington products delivered to foreign harbors. These elements are federal international trade policies that help open overseas markets, and protect against violation of US trade laws by our trading partners, federal taxation of international business of US companies that provide American exporters a level playing field, and an efficient transportation system -- one as seamless and cost effective as we can make it. You will note that only one of these is within the scope of state and local officials: improving transportation efficiencies.

In order to maintain safe navigation and to help our Port compete more effectively overseas, I respectfully urge DEQ to approve the Port's beneficial use permit allowing the Corps of Engineers to dredge approximately 75,000 cubic yards of material from an area in the Willamette River known as Post Office Bar and to deliver dredged materials to the designated location known as the West Hayden Island Placement Facility.

From what I am told, DEQ reviewed laboratory analytical data for the sediments to ensure contaminant concentrations are below levels of concern for people and animals based on current and proposed future uses of the site.

Maintenance dredging at the Post Office Bar and others sites within the Willamette and Columbia Rivers is necessary to maintain navigational safety and to provide efficient intermodal access to ocean-going vessels as efficiently as possible.

As a local sponsor, the Port provides placement sites for sediment for fill purposes in coordination with Corps of Engineer dredging. For over 75 years, dredged materials have been placed at West Hayden Island. Specifically the Port of Portland owns West Hayden Island and has placed sediments at the West Hayden Island Placement Facility for over a dozen years.

Dredged material placement from dredging Post Office Bar should be permitted, so that the Port can offer exporters more competitive access to a river system that helps local companies export and enter new markets.

On behalf of the Pacific Northwest International Trade Association, I respectfully request that DEQ approve this sediments transfer, as a competitive harbor-- as evidenced by required dredging and dredged materials placement-- is important in our region's future economic success.



NB: Sent as an e-mail on April 8, 2011:

Dear Portlander,

When we think of Portland, global trading center may not be the first thing that comes to mind. But the fact is, the Portland region is the 2nd largest per capita exporter in the nation, and the 12th largest exporter—period. When it comes to trade, we lead Atlanta, Washington DC, Phoenix--cities more than twice our size.

Our economy is tied to global markets. To succeed, Portland must become the world's scrappiest and most successful small global city. This is why I recently spent a week in Germany, focused on retaining several of our key global businesses.

Growth in the traded sector makes us a global city in the best sense. It means we create our own jobs on our own terms. We diversify our economy, and create a more resilient Portland area economy. That is why our economic development strategy focuses on the traded sector cluster industries of clean technology, digital development, athletic and outdoor apparel, and advanced manufacturing.

International trade is not just about big business. In fact, 88 percent of our state's direct exporters are small or medium-sized firms. By working together, we can open up new markets for our products and services.

This was the goal last September, when I led a Portland sustainable business delegation to Toronto, Canada. As a result of our sales meetings, Portland green roof company Columbia Green Technologies signed millions of dollars of new contracts across Canada.

Foreign direct investment has also brought some of the world's leading international companies to our region. This can provide much needed new business when local capital is hard to come by, and supports family-wage jobs for Portlanders.

When I traveled to Japan in 2009, I encouraged Ajinomoto to invest \$12.5 in their new food processing facility in Portland. In February, I made a short trip to Madrid to retain the business of Spanish energy giant Iberdola, located in the Pearl District.

And just last week I returned from a business mission to Germany. The focus of this trip, organized with the Portland Business Alliance, was to deepen relationships with an impressive core of German companies invested in the Portland region.

Adidas. Daimler Trucks. Solarworld. Wacker Siltronic.

These are some of the leading and most dynamic German firms. Together, German investment in our region accounts for 10,000 jobs, 2.4 percent of exports and 4 percent of imports.

Across the board, Portland faces challenges in retaining these key global businesses: For example, Adidas owns another major brand -- Reebok -- with a second large campus in Massachusetts; 70 percent of Daimler's truck sales are on the east coast; Solarworld and Wacker Siltronic must compete against tough China manufacturing.

Relationships are forged with the outreach we just made to these German businesses. That is important. New sales and investments are easier when you actually know whom you are dealing with.

Together, our new strategies on international trade and investment represent fundamental improvements to make our regional economy more resilient. Our efforts are still new. It has been just 27 months since we passed our economic development strategy. But our early successes demonstrate that we are on the right path.

We have much more work to do. Onward!

Sincerely,

Sam Adams
Mayor

PENCE Holly

From: PENCE Holly
Sent: Thursday, April 14, 2011 9:43 AM
To: 'Jimme Peters'
Cc: ROICK Tom; WILES Wendy; OBRIEN Audrey
Subject: RE: West Hayden Island comments

Thank you for your comments on this issue. I will add them to the public record for the site.

Holly Pence, Solid Waste Permit Coordinator
DEQ Northwest Region
2020 SW 4th Ave Ste 400
Portland OR 97201
503-229-5353
Toll-Free in Oregon 1-800-452-4011
Fax 503-229-6945
Pence.Holly@deq.state.or.us

Messages to and from this e-mail address may be available to the public under Oregon Public Records law.

-----Original Message-----

From: Jimme Peters [REDACTED]
Sent: Wednesday, April 13, 2011 11:02 PM
To: PENCE Holly
Subject: West Hayden Island comments

Hello-

Please place these comments in the record for the dredging reconsideration.
If you would kindly confirm receipt, it would be appreciated.

To Whom It May Concern:

After attending the second meeting on the Post Office Bar dredging last night, my opposition has grown even stronger to placing the spoils on Hayden Island. The story keeps changing as to the proposed activities and as a citizen, I will not stand for this deception and must bring attention to the mishandling of this project. We do not know what to believe and certainly do not feel that our best interests, health, or community are being considered.

Jobs, safe navigation, port commerce are desired by all of us. But, not at a huge cost. Many toxins have unknown consequences. Unlike the Japanese enduring unforeseen radiation, we do have choices and options, regardless of what the Port says about other locations being unavailable.

The condescending tone and lack of listening/facilitating skills by Wendy Wiles last night was disgusting. Her approach and tone is that we as citizens are bothering her and that it is inconveniencing her to have to hold these meetings. She even had the nerve to whisper to another DEQ official during a question being asked from the audience and then cut him off completely. She put her hand up while stating that no one would be answering his question as she wanted to start the presentation. So much for

public interaction! This does not bode well for the island residents, nor should it be considered appropriate behavior from a public employee.

Sebastian Deggens from the Port stated that "they were not sure if the spoils from T5 would be covered by the Post Office Bar material". The T5 spoils have contaminants that are three times the SLV allowed and we are just supposed to accept this as okay for our island. Being told that four years exposure could not hurt anyone until they determine what to do with the toxic dirt is far from comforting nor seems lawful. The Port only cares about its interests, not ours as indicated by dumping the Superfund T5 spoils on our community.

All these loopholes and bulldozing by the proverbial "we" that is comprised of the various staff from the Port, DEQ, Army Corps, City of Portland, paying consultants to testify, and others are clearly in joint negotiations without us. These people disregard the public process as a nuisance and their actions are clear, move forward, right or wrong, the public and our community does not matter.

Please remove the T5 soils, stop Post Office Bar from being placed on Hayden Island and let our green space remain as a wildlife and recreation park as nature intended.

Thanks,

Jimme' Peters
[REDACTED]

From: [Ann Gardner](#)
To: [PENCE Holly](#)
Cc: [BJ Bachmeier](#)
Subject: Post Office Bar and Placement Site
Date: Monday, April 18, 2011 10:47:09 AM
Attachments: [deqapril2011.doc](#)

<<deqapril2011.doc>>

Holly, I understand letters of support need to be to you by 5 today.

I am hopeful tha the attached letter of support can be put on our letterhead and sent to you within that time limit. If not, however, please accept these comments as our support for the project. Thanks so much for your interest in this import project.

Ann L. Gardner
Working Waterfront Coalition
c/o Portland Business Alliance
200 SW Market Street, Suite 150
Portland, OR 97201

agardner@portlandalliance.com
503 552-6755

April 18, 2011

Ms. Holly Pence
Solid Waste Permit Coordinator
Oregon Department of Environmental Quality
2120 SW 4th Avenue, Suite 400
Portland, OR 97201

Re: Post Office Bar Dredging and Placement.

Dear Ms. Pence:

The Working Waterfront Coalition (WWC) is on record supporting the maintenance dredging of Post Office Bar and placement of the dredge materials at the previously approved dredge disposal site on West Hayden Island. We are writing again to reaffirm our support for this project and to encourage the DEQ to continue its support for this economical and suitable placement site.

Over 50 industrial marine businesses that support approximately 20,000 local jobs rely on the Willamette River federal waterway for the shipment of raw materials and finished goods. The area in the vicinity of Post Office Bar at river mile 2.1 – 2.4 is an area of severe shoaling and creates safety and efficiency issues for ocean going vessels that move through this area each day. This is a serious and deteriorating situation that should be addressed immediately.

The Corps of Engineers has developed a dredge materials management plan that will protect the waters of the state. It is essential that the DEQ continue its support for the West Hayden Island dredge disposal site. Disposal sites, such as this, are essential to keeping our trade routes safe and efficient.

Again, please take whatever actions are necessary to move this project forward at the earliest possible date.

Sincerely,

Ann L. Gardner
Executive Director