

September 14, 2018

**Yakama Nation Fisheries Technical Comments on the Draft Cleanup Action Plan
for the Former Reynolds Metals Reduction Plant – Longview, Date August 2018**

General Comments:

The Yakama Nation appreciates the Washington Department of Ecology working with us on an adaptive solution to protect aquatic receptors in the Columbia River. The additional monitoring requirements and fluoride screening level offers a viable path forward for evaluating the remedies protectiveness of aquatic resources but Ecology will need to continue to collaborate with Yakama Nation on the details of Cleanup Action Plan (CAP) implementation. Additionally, we understand that the future use of this facility is a separate process but it must be noted that we expect a complete cleanup before any sort of new development is implemented at the site. Please see our specific comments on the CAP and appendices below:

Specific Comments:

Appendix A Section 3.5 states, “Prior to development of the SQAPP, a Sampling Location Study Work Plan will be developed and submitted to Ecology for approval. The Sampling Location Study Work Plan will describe the site-specific data that will be collected and/or evaluated to select post-construction porewater monitoring locations and timing such as groundwater monitoring data, tidal information, and video documentation of tidal changes and active seeps.” Yakama Nation must be involved in the early stages of this plan to ensure our thoughts are considered early in the process and unnecessary delays are avoided. We would like to clarify that we expect that the Sampling Location Study Work Plan’s discussion of porewater monitoring locations to include the details on the depth of sampling. Many areas of the Columbia River contain large amounts of riprap and true porewater does not exist until you have reached point within the benthos underneath the riprap. Section 3.5.5 states, “NMDS samplers will be placed within the sediment at the base of the bioactive zone 10 centimeters (cm) below the mudline.” Defining exact location of the mudline is likely to be a complicated issue due the heterogeneous nature of the Columbia River. We look forward to working on a collaborative solution to this issue.