Message

From: Sheldrake, Sean [sheldrake.sean@epa.gov]
Sent: 7/31/2020 1:23:51 AM
To: Jeremy_Buck@fws.gov; Bob Schwarz [Bob.SCHWARZ@state.or.us]; PETERSON Jenn L [Jenn.L.PETERSON@state.or.us]; shil@yakamafish-nsn.gov; dexb@yakamafish-nsn.gov
CC: Marcy, Ken [Marcy.Ken@epa.gov]
Subject: RE: [EXTERNAL] Draft Bradford Island crayfish, SMB, clam comments (sf)2
Attachments: Bass and Crayfish QAPP Comments_30July2020_JBuck.docx

Thanks for sharing Jeremy; I support everything you've drafted. S

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From: Buck, Jeremy <jeremy_buck@fws.gov>
Sent: Thursday, July 30, 2020 5:08 PM
To: Sheldrake, Sean <sheldrake.sean@epa.gov>; Bob Schwarz <Bob.SCHWARZ@state.or.us>; PETERSON Jenn L <Jenn.L.PETERSON@state.or.us>; shil@yakamafish-nsn.gov; dexb@yakamafish-nsn.gov
Cc: Marcy, Ken <Marcy.Ken@epa.gov>
Subject: RE: [EXTERNAL] Draft Bradford Island crayfish, SMB, clam comments (sf)

Ok- here's the draft version of my comments. Thanks-Jeremy

From: Sheldrake, Sean <sheldrake.sean@epa.gov>
Sent: Friday, July 24, 2020 2:00 PM
To: Bob Schwarz <Bob.SCHWARZ@state.or.us>; Buck, Jeremy <jeremy_buck@fws.gov>; PETERSON Jenn L <Jenn.L.PETERSON@state.or.us>; shil@yakamafish-nsn.gov; dexb@yakamafish-nsn.gov
Cc: Marcy, Ken <Marcy.Ken@epa.gov>
Subject: [EXTERNAL] Draft Bradford Island crayfish, SMB, clam comments (sf)

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All, Please see my preliminary comments below—let me know if you'd suggest I add/modify/delete anything so we're as close to speaking with one voice as possible to move things forward in a prioritized fashion. From an NCP RI/FS perspective, there is an explicit requirement for EPA to approve of sampling approaches taken under CERCLA so I'd be happy to repeat any common themes that I may have missed to help bring attention to your concerns.

Thanks for your time this week!

S

1. Data quality objectives require further refinement. It seems that nature and extent is the primary objective with an updated view of current site risks as an additional objective. Understanding these objectives and framing the interpretation of this data before program execution is crucial to best eliminate bias in the sampling design, and better ensure consensus on later interpretation. DQOs should be further refined before FSP development to ensure consistent sampling design, e.g. size of the fish being collected, fish tracking timing relative to foraging behavior trying to be explained, etc.
2. DQOs should be developed in light of overall RAOs and lines of evidence associated with them, e.g. various species home ranges and COC distributions in those exposure units. For example, if SMB exhibit acceptable (ie. equivalent to background) levels, what other species will be scrutinized to express achievement of RAOs? Over what spatial area? This information is critical to establishment of appropriate strata and decision units to evaluate over time.
3. If possible, it would be useful to archive individual samples (ie. 30 clams) before compositing for nature and extent purposes to be run later, if possible, based on criteria developed beforehand that might be useful for source area definition.
4. It is unclear to me if sufficient lack of spatial bias exists to directly compare each data set, e.g. for clams between 2011 and 2020 are the study designs in terms of randomization similar enough to allow for an unqualified comparison? If additional steps are necessary to de-bias previous data, that would be helpful to spell out here and agree upon.
5. It is unclear what the data objective is for "reoccupation of historic sampling locations" and what conclusions USACE believes can be derived from doing so? Rather it seems the goal should be to represent each strata and sub areas with an appropriately random sample collection to compare areas between time steps while being as free as possible from spatial bias. This may be the intent of the study but hopefully the underlying approach can be clarified relative to removing as much spatial bias as possible before dataset comparison.
6. While DQOs may not involve collection of information on all COCs for each species at this time to prioritize limited resources perhaps to the nature and extent DQO, it should be stated that source information is not well understood for non PCB COCs that need to be carried forward, particularly if non PCB COCs begin to drive risk potentially in certain areas.
7. Given that nature and extent is still of [highest] interest, and clams do not uptake the full range of site COCs except at very high levels, foregoing Cascade Locks SMB reference area sampling in favor of another species that do uptake a broader range of COCs over a smaller home range collected in the forebay, such as sculpin and additional crayfish, is recommended. These species can both service updated risk evaluations as well as the primary nature and extent objective. In addition, additional sample numbers in the forebay area will be more useful in increasing the statistical power of these datasets. When reference area information is needed to evaluate whether SMB at the source area have reached achievable anthropogenic background levels, an equivalence approach should be developed with an appropriate dataset that has been scrubbed of outliers to evaluate achievement of RAOs for tissue and other media. For example, it seems that Cascade locks has several clear outliers. In the future, outliers should be discarded per the dataset per EPA guidance.
8. There seem to be very distinct populations amongst PCB SMB tissue results in the forebay. This could be utilized in the future as a nearby reference area for the purposes of reaching equivalence, but how this is interpreted should be agreed upon beforehand.

9. Acoustic tracking. As much as this would be very interesting information, reconfirming the home range and level of movement during foraging of small mouth bass without seeing the specific tissue COC levels for certain behaviors may not answer any of the fundamental study questions above, as SMB are a poor indicator of potentially small source area(s) as theorized in the CSM. Perhaps these resources would be better focused in collection of sculpin, added craysfish, and clams around Bradford Island where possible.
10. Crayfish traps. Some discussion of treatment of salmonid bycatch should be added here and reviewed by NMFS staff to ensure adequacy of proposed BMPs.

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