

## THE CONFEDERATED TRIBES OF THE WARM SPRINGS RESERVATION OF OREGON



Warm Springs, Oregon 97761 / 541 553-1151

Larry Timchak  
Ochoco National Forest  
PO Box 490  
3160 NE 3<sup>rd</sup>. Street  
Prineville, Oregon 97754

July 2, 2003

Re: Blue Ridge / Amity Reclamation Project

Dear Mr. Timchak:

The Confederated Tribes of the Warm Springs Reservation of Oregon (CTWSRO) has received information on the Engineering Evaluation and Cost Analysis for the Blue Ridge/Amity Mining Reclamation project, which will be implemented under the Comprehensive Environmental Response Compensation and Liability Act (CERCLA).

As you may know, the CTWSRO has a direct interest in the proposed management activities on the Ochoco National Forest as this is within the area of the CTWSRO ceded lands. The boundaries of ceded lands for the CTWSRO were defined in the Treaty of 1855 and encompass approximately ten million acres from Cascade Locks on the Columbia River, south to Bend, east to the Blue Mountains including the John Day basin, and north to the Columbia River. The Tribes have co-management authority over the fish, wildlife, and water quality, along with the state of Oregon, within the area of these ceded lands. Equally as important to the CTWSRO is the presence of any sites of cultural significance in these areas.

On Thursday June 26<sup>th</sup>., I traveled out to view the sites with Caroline Gordon, geologist. The following comments arose from our field trip:

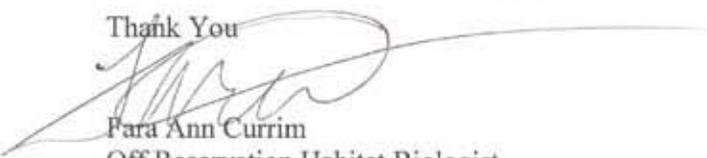
- Roads within the areas that have limited access, and can be removed, should be. Drainage should be improved on those that cannot via water bars.
- The processing building within the Blue Ridge site should be demolished and the materials removed, as contamination has been noted by Cascade Earth Sciences (CES) (EECA pg. 14&15).

- The bank stability project on Johnson creek should occur. The old waste pile is slowly sloughing off into the creek.
- The proposed waste piles that are to be constructed on the Blue Ridge site should occur on a flat, stable area, and should avoid any drainage into the Winter creek wetlands. If this cannot be accomplished, a bottom liner for the piles, should be incorporated into the design. A "water balance" cover has been proposed by CES. Seepage that can vary depending on precipitation, and / or gradient should be taken into account.
- The placement of the waste piles on the Blue Ridge site should also avoid leaching into the intermittent drainage on site.
- A post monitoring program should be incorporated into the proposed action for cleanup. This monitoring should incorporate mercury readings on upland and creek sites. Total mercury concentrations on creek sites have shown higher than normal concentrations for ODEQ freshwater chronic criteria for aquatic life in some areas.

In general, the proposed 3b alternative appears to be the most suited for reclamation of this area. The U.S. Forest Service should comply with any recommendations from the Oregon Department of Environmental Quality (ODEQ). CTWSRO would also like to be kept informed of this process for the long term.

If you have any questions, you may contact me at (541) 553-2041.

Thank You



Para Ann Currim  
Off Reservation Habitat Biologist

cc: Carrie Gordon (Ochoco NF)  
Bobby Brunoe (CTWSRO)  
Clay Penhollow (CTWSRO)  
Terry Luther (CTWSRO)