



STATE OF WASHINGTON  
**DEPARTMENT OF ECOLOGY**

Central Region Office

1250 West Alder St., Union Gap, WA 98903-0009 • 509-575-2490

December 20, 2024

**Sent via email**

Casey Barney, Cultural Resources Program  
Yakama Nation  
PO Box 151  
Toppenish, WA 98948

**RE: Submittal of the draft “Wishram Railyard Sediment Feasibility Study” for the following Site:**

- **Site Name:** BNSF Track Switching Facility
- **Site Alias:** Wishram Railyard
- **Site Address:** 500 Main Street, Wishram
- **Facility Site ID:** 1625461
- **Cleanup Site ID:** 230
- **Agreed Order:** DE 12897

Dear Casey Barney:

The Department of Ecology (Ecology) is sharing this draft document with you to solicit input from the Yakama Nation Cultural Resources Program. For the last several years, we have been working closely with the Yakama Nation Department of Fisheries regarding the investigation of contamination at the upland and in-water portions of the site. We are now in the stage where Ecology will select a cleanup alternative for the in-water portion. The resulting cleanup will lead to the restoration of the aquatic habitat.

This draft Feasibility Study (FS) presents several cleanup alternatives that will address the contaminated sediments. One of these alternatives will be selected as the final cleanup action. Ecology wants to ensure that we have your input so that tribal interests are fully represented at this remedy selection stage.

Our regulations require Ecology to consider all remedial alternatives to restore the environment, but we must choose the one that is the most permanent and protective balanced by cost and other factors such as impacts to cultural resources. For sediment sites, the most permanent and protective remedial alternatives include some level of dredging with provisions to adequately evaluate and manage cultural resources that may be encountered during remediation. Note that the level of detail in this draft FS is general. A more detailed process will be described in the associated decision documents to be developed.



Casey Barney  
Yakama Nation  
December 20, 2024  
Page 2

These other decision documents will include the Engineering and Design Report, the Operations & Maintenance Plan, and the Compliance Monitoring Plan.

Note also that prior investigative work was performed in consultation with the Department of Archaeology and Historical Preservation (DAHP) and the Yakama Nation Cultural Resources Program. In 2016, an archaeological excavation permit was obtained from DAHP, and this permit has been updated for each phase of the work that has been completed to date. Fieldwork was performed in accordance with the conditions imposed under the permit. One of the permit conditions included having a licensed archaeologist monitor any soil or sediment for cultural resources as well as operating under an Inadvertent Discovery Plan (IDP). The IDP called for the Yakama Nation Cultural Resource Program to be notified if a discovery occurred.

I suggest that your program review Section 3.2.2 (Remedial Alternatives). Alternative 2 proposes excavation of the contaminated sediments so there is a likelihood of disturbing cultural resources. However, this proposal includes a cultural resource evaluation of the dredged sediments. Alternative 4 also involves disturbance to the sediments that will effectively immobilize the sediment contamination but will likely not involve as much evaluation as proposed for Alternative 2. Alternatives 3A through 3C involve capping options that will include limited disturbance.

Our goal is to collect your input to supplement any comments I receive from the Yakama Nation Department of Fisheries so that Ecology will have a comprehensive understanding of the Yakama Nation's interests and priorities. I do not want to move forward with only limited input from the Yakama Nation. Ecology will then have the task of reviewing all the input received and formulating the best approach to the cleanup.

If you wish, we will schedule a meeting with relevant staff from your Program to discuss this site and the proposed options. Ecology would like to have your input before the end of January. Please let me know if you need more time. Feel free to contact Ecology's Tavi Wise for questions regarding cultural resources by email at Tavi.Wise@ecy.wa.gov or call 509-406-6959.

Thank you for your contribution in helping us select and ultimately craft the remedy that will best align with the Yakama Nation's collective interest.

Sincerely,



John Mefford  
Ecology Cleanup Project Manager/Hydrogeologist  
Toxics Cleanup Program  
Central Regional Office

Attachment via email: Wishram\_Sediment\_FS\_Draft\_Nov8\_2024.pdf

cc: Elena Ramirez Groszowski, Yakama Nation, Department of Fisheries