

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
SAN DIEGO REGION**

**In re: Tentative Cleanup and  
Abatement Order No. R9-2010-0002  
(Shipyard Sediment Cleanup)**

**Presiding Officer King**

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**SAN DIEGO COASTKEEPER'S AND ENVIRONMENTAL HEALTH COALITION'S  
MOTION TO AMEND EXPERT AND NON-EXPERT WITNESS DESIGNATIONS**

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San Diego Coastkeeper and Environmental Health Coalition hereby move to amend their expert and non-expert witness designations initially provided on July 19, 2010, pursuant to California Code of Civil Procedure §2034.610(a). Through this motion, San Diego Coastkeeper and Environmental Health Coalition intend to limit and specify their witness testimony from that initially indicated and to include a witness declaration for Donald MacDonald, required pursuant to § 2034.260(c) of the California Code of Civil Procedure. This motion will not prejudice any Designated Party because San Diego Coastkeeper and Environmental Health Coalition have not added any new witnesses nor expanded the subjects on which the remaining witnesses will testify.

San Diego Coastkeeper and Environmental Health Coalition seek to amend their witness designations as follows:

**Expert witness retained for the purpose of forming and expressing an opinion in anticipation of the hearing (Cal. Code of Civ. Procedure §2034.210(b)):**

Donald MacDonald  
Principal Researcher and Director  
MacDonald Environmental Services  
#24-4800 Island Highway N  
Nanaimo, British Columbia V9T 1W6 CANADA

**Potential expert witness, but not retained for the purpose of forming and expressing an opinion in anticipation of the hearing:**

Katie Zeeman  
Toxicologist  
U.S. Fish and Wildlife Service  
6010 Hidden Valley Road  
Carlsbad, CA 92011

**Non-Expert Witnesses:**

Laura Hunter  
Associate Program Director  
Environmental Health Coalition  
2727 Hoover Ave., Suite 202  
National City, CA 91950

Joy Williams  
Research Director  
Environmental Health Coalition  
2727 Hoover Ave., Suite 202  
National City, CA 91950

Ms. Hunter and Ms. Williams are available to testify regarding the report entitled “Survey of Fishers on Piers on San Diego Bay, Results and Conclusion,” referenced on Page 1-25 of the Draft Technical Report on behalf of Environmental Health Coalition. BAE is seeking to depose Ms. Sonia Rodriguez, presumably about the “Survey of Fishers on Piers on San Diego Bay, Results and Conclusion.” Ms. Rodriguez is a former employee of Environmental Health Coalition, and is not available to be deposed, but Ms. Hunter and Ms. Williams will be able to provide testimony on the survey in her absence.

San Diego Coastkeeper and Environmental Health Coalition remove the following previously-designated witnesses from their witness list: Clay Clifton, Jen Kovecses, Bruce Reznik, Diane Takvorian, Ed Kimura, and Steve Bay. The foregoing individuals may provide

public comment in the form of policy statements at the hearing, but are not prepared to submit comments containing evidence beyond policy-statements.<sup>1</sup>

For these reasons, and in light of the fact that limiting the witness list and testimony subjects will not prejudice any Designated Party but will aid in streamlining the discovery process, we respectfully request the Presiding Officer grant San Diego Coastkeeper's and Environmental Health Coalition's Motion to Amend Expert and Non-expert Witness Designations.

Respectfully Submitted on August 6, 2010 by:



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Jill M. Witkowski, Cal. Bar No. 270281  
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On behalf of San Diego Coastkeeper and  
Environmental Health Coalition

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<sup>1</sup> See Presiding Officer King's February 16, 2010 Order at II.B.2.

## DECLARATION OF JILL M. WITKOWSKI

I, Jill M. Witkowski, declare as follows:

1. I am Staff Attorney for San Diego Coastkeeper and counsel for Environmental Health Coalition in this matter.
2. I make this declaration based upon information and belief.

### **Expert Witness Declaration: Donald MacDonald**

3. Donald MacDonald is Principal Researcher and Director of MacDonald Environmental Services. He is an expert in environmental toxicology and chemistry, ecosystem-based resource management, water quality/water use interactions, and sediment quality assessment—including contaminated sediment and remediation plans. His qualifications are outlined in the attached curriculum vitae.
4. Dr. MacDonald is expected to provide testimony regarding various aspects of the Tentative Cleanup and Abatement Order and Draft Technical Report, as well as an additional remediation footprint that would address impacts on benthic invertebrates and other wildlife using the site.
5. Dr. MacDonald has agreed to testify at the hearing on the Tentative Cleanup and Abatement Order.
6. Dr. MacDonald will be sufficiently familiar with the pending action to submit to a meaningful oral deposition concerning the specific testimony, including any opinion and its basis, that he is expected to give at the hearing on the Tentative Cleanup and Abatement Order.

7. Dr. MacDonald's hourly expert fees for providing deposition testimony is \$225, and his hourly expert fee for consulting with San Diego Coastkeeper and Environmental Health Coalition is \$145.56.
8. Dr. MacDonald is available to be deposed in San Diego on August 11, 12, or 13, 2010, with August 11th or 12th being the most convenient days for Mr. MacDonald

**Meet and Confer on Motion to Amend**

9. On August 3, 2010, I e-mailed to counsel for all Designated Parties a proposed copy of San Diego Coastkeeper's and Environmental Health Coalition's Motion to Amend Expert and Non-Expert Witness Designations. I requested that all counsel respond to me by close of business on August 5, 2010.
10. At 1:45pm on August 5, 2010, I re-sent my original e-mail to counsel for all Designated Parties requesting a response from those who had not yet responded.
11. As of close of business on August 5, 2010, I received responses of no objection from BAE, the Cleanup Team, and the Port. None of the other parties responded to my attempts to meet and confer.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 6th day of August, 2010 at San Diego California



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Jill M. Witkowski

## EDUCATION:

Bachelor of Science, Zoology  
(Fisheries Biology; Environmental Physiology, Comparative Biochemistry)  
University of British Columbia, 1982

## SPECIALIZATION:

Principal of MacDonald Environmental Sciences Limited, which was established to provide scientific consulting services in the fields of fisheries and aquatic resource management, stream ecology, environmental quality guidelines and policy development, environmental risk and hazard assessment, and information and technology transfer.

Specialist environmental toxicology and chemistry, ecosystem-based resource management, water quality/water use interactions, and sediment quality assessment.

## PROFESSIONAL MEMBERSHIPS:

American Fisheries Society  
President Western Division; Past-President, Canadian Aquatic Resources Section; Nominations Committee; Chair, Wetlands Conservation Committee; Newsletter Committee; Membership Committee.  
Aquaculture Association of Canada  
Association of Professional Biologists of British Columbia  
Canadian Association on Water Pollution Research and Control  
International Association on Water Pollution Research and Control  
Society of Environmental Toxicology and Chemistry

## OTHER PROFESSIONAL ACTIVITIES:

1986-1988 Newsletter Editor, North Pacific International Chapter, American Fisheries Society  
1987-1989 Chair, Membership Committee, North Pacific International Chapter, American Fisheries Society  
1992-1994 Chair, Wetlands Conservation Committee, Canadian Aquatic Resources Section, American Fisheries Society  
1990-1994 Vice-President, President-Elect, President, and Past-President, Canadian Aquatic Resources Section, American Fisheries Society  
1995-Present Canadian Director and Chair, Board of Directors, Sustainable Fisheries Foundation  
1997-2001 Vice-President, President-Elect, President, and Past-President, Western Division, American Fisheries Society  
2000-2001 Member, Membership Committee, American Fisheries Society  
2003-2006 Award of Excellence Committee, American Fisheries Society  
2005-2006 Member, Science Advisory Board for Contaminated Sites in British Columbia  
2006-Present Board of Directors, Mid-Island Science, Technology & Innovation Council (MISTIC)

## PROFESSIONAL CERTIFICATIONS:

Fisheries Professional-Certified (American Fisheries Society)  
Registered Professional Biologist (Association of Professional Biologists of British Columbia)

## EXPERIENCE:

### *AQUATIC BIOLOGIST - February 1989 to Present*

**MacDonald Environmental Sciences Limited, #24 - 4800 Island Highway North, Nanaimo, B.C. V9T 1W6** Independent consulting on environmental impact assessment, natural resource damage assessment, ecological risk assessment, fisheries and aquatic resource management, environmental quality, stream ecology, computer data management, and information and technology transfer. Projects include the development of water quality guidelines, sediment quality guidelines, tissue residue guidelines, environmental quality monitoring programs, fisheries co-management programs, ecosystem-based management, ecological risk assessments, natural resource damage assessments, and the assessment of environmental quality.

### *WATER QUALITY OBJECTIVES OFFICER - September 1984 to February 1989*

**Water Quality Branch, Inland Waters, Environment Canada, 502 - 1001 West Pender Street, Vancouver, B.C. V6E 2M9** Compilation, management and statistical analysis of existing and new information generated to support the formulation of water quality objectives in waters of significant federal interest; generation of water quality criteria information through toxicological, water quality, and other studies; design and implementation of monitoring programs to assess compliance with water quality objectives; preparation of reports and other publications on information developed to formulate water quality objectives; organization of workshops and information exchange sessions on water quality guidelines and objectives; provision of information and advice to technical committees established to resolve the International Joint Commission reference on the Flathead River. Supervisor: Dr. D. Valiela, Head Water Quality Objectives Division

### *TECHNICAL PLANNING COORDINATOR - November 1983 to September 1984*

**Water Quality Branch, Inland Waters, Environment Canada, 502 - 1001 West Pender Street, Vancouver, B.C. V6E 2M9** Planning and development of regional water quality programs, including long- and short-term logistics and budgetary requirements and inter-project coordination; planning, organization, expedition, and supervision of special field studies and sampling projects for water quality analysis; pollution surveillance and sediment sampling; planning and implementation on national water quality monitoring programs to assess national trends and conditions. Supervisor: Dr. W.E. Erlebach, Chief Water Quality Branch

**PUBLICATIONS AND TECHNICAL REPORTS:***Journal/Book Publications*

- Clark, M.J.R., D.D. MacDonald, P.H. Whitfield, and M.P. Wong. 2009. Designing monitoring programs for water quality based on experience in Canada. Part II - Monitoring Tools - Problem Characterization and Data Quality Objectives. In Review.
- MacDonald, D.D., M.J.R. Clark, P.H. Whitfield, and M.P. Wong. 2009. Using water sampling for decision making for status and trends: Part III - Ecosystem Based Management and Water Quality Objectives - Problem Characterization and Data Quality Objectives. In Review.
- MacDonald, D.D. M.J.R. Clark, P.H. Whitfield, and M.P. Wong. 2009. Designing monitoring programs for water quality based on experience in Canada I. Theory and framework. *Trends in Analytical Chemistry* 28(2):204-213.
- Ingersoll, C.G., N.E. Kemble, J.L. Kunz., W.G. Brumbaugh, D.D. MacDonald, and D. Smorong. 2009. Toxicity of sediment cores collected from the Ashtabula River in Northeastern Ohio, USA, to the amphipod *Hyaella azteca*. *Archives of Environmental Contamination and Toxicology* 57(2):315-329.
- Bay, S.M., W. Berry, P. Chapman, R. Fairey, T. Gries, E. Long, D. MacDonald, and S. Weisberg. 2007. Evaluating consistency of best professional judgment in the application of a multiple lines of evidence sediment quality triad. *Integrated Environmental Assessment and Management* 3(4):491-497.
- Long E.R., C.G. Ingersoll, and D.D. MacDonald. 2006. Calculation and uses of mean sediment quality guidelines: A critical review. *Environmental Science and Technology* 40(6):1726-1736.
- Ingersoll, C.G., S.M. Bay, J.L. Crane, L.J. Field, T.H. Gries, J.L. Hyland, E.R. Long, D.D. MacDonald, and T.P. O'Connor. 2005. Ability of sediment quality guidelines to estimate effects or no effects of sediment-associated contaminants in laboratory toxicity tests or in benthic community assessments. *In: Wenning RJ, Batley G, Ingersoll CG, editors. Use of sediment quality guidelines (SQGs) and related tools for the assessment of contaminated sediments. 497-556. SETAC Press. Pensacola Florida.*
- MacDonald, D.D., R.S. Carr, D. Eckenrod, H. Greening, S. Grabe, C.G. Ingersoll, S. Janicki, R.A. Lindskoog, E.R. Long, R. Pribble, G. Sloane, and D.E. Smorong. 2004. Development, evaluation and application of sediment quality targets for assessing and managing contaminated sediments in Tampa Bay, Florida. *Archives of Environmental Contamination and Toxicology* 46(2):147-161.
- Knudsen, E.E., D.D. MacDonald, and Y.K. Muirhead, editors. 2004. Sustainable management of North American fisheries. American Fisheries Society, Symposium 43, Bethesda, Maryland.
- Carr, R.S., J.M. Biedenbach, and D.D. MacDonald. 2003. Comparison of sediment quality guideline values derived using sea urchin porewater toxicity test data with existing



- guidelines. *In: Porewater Toxicity Testing: Biological, Chemical, and Ecological Considerations* R.S. Carr and M. Nipper (Eds). Setac Press. Pensacola, Florida.
- Crane, J.L. and D.D. MacDonald. 2003. Applications of numerical sediment quality targets for assessing sediment quality conditions in a U.S. Great Lakes Area of Concern. *Environmental Management* 32(1):128-140.
- Nipper, M. R.S. Carr, W.J. Adams, W.J. Berry, G.A. Burton Jr., K.T. Ho. D.D. MacDonald, R. Scroggins, and P.V. Winger. 2003. Recommendations for research related to biological, chemical, and ecological aspects of sediment pore water: The way forward. *In: Porewater Toxicity Testing: Biological, Chemical, and Ecological Considerations* R.S. Carr and M. Nipper (Eds). Setac Press. Pensacola, Florida.
- MacDonald, D.D., C.G. Ingersoll, D.E. Smorong, R.A. Lindskoog, D.W. Sparks, J.R. Smith, T.P. Simon, and M.A. Hanacek. 2002. Assessment of injury to fish and wildlife resources in the Grand Calumet River and Indiana Harbor area of concern. *Archives of Environmental Contamination and Toxicology* 43:130-140.
- MacDonald, D.D., M.A. Hanacek and L. Genn. 2002. Salmon, society and politics: The potential for ecosystem-based management of pacific salmon. *In: Sustaining North American Salmon: Perspectives Across Regions and Disciplines*. American Fisheries Society.
- MacDonald, D.D., C.G. Ingersoll, D.E. Smorong, R.A. Lindskoog, D.W. Sparks, J.R. Smith, T.P. Simon, and M.A. Hanacek. 2002. An assessment of injury to sediments and sediment-dwelling organisms in the Grand Calumet River and Indiana Harbor area of concern. *Archives of Environmental Contamination and Toxicology* 43:141-155.
- Crane, J.L., D.D. MacDonald, C.G. Ingersoll, D.E. Smorong, R.A. Lindskoog, C.G. Severn, T.A. Berger, and L.J. Field. 2002. Evaluation of numerical sediment quality targets for the St. Louis River area of concern. *Archives of Environmental Contamination and Toxicology* 43:1-10.
- Ingersoll, C.G., D.D. MacDonald, W.G. Brumbaugh, B.T. Johnson, N.E. Kemble, J.L. Kunz, T.W. May, N. Wang, J.R. Smith, D.W. Sparks, and S.D. Ireland. 2002. Toxicity assessment of sediments from the Grand Calumet River and Indiana Harbor Canal in northwestern Indiana. *Archives of Environmental Contamination and Toxicology* 43:156-167.
- Field, L.J., D.D. MacDonald, S.B. Norton, C.G. Ingersoll, C.G. Severn, D. Smorong, and R. Lindskoog. 2002. Predicting amphipod toxicity from sediment chemistry using logistic regression models. *Environmental Toxicology and Chemistry* 21(9):1993-2005.
- Ingersoll C.G., D.D. MacDonald, N. Wang, J.L. Crane, L.J. Field, P.S. Haverland, N.E. Kemble, R.A. Lindskoog, C.G. Severn, and D.E. Smorong. 2001. Predictions of sediment toxicity using consensus-based freshwater sediment quality guidelines. *Archives of Environmental Contamination and Toxicology*. *Archives of Environmental Contamination and Toxicology* 41:8-21.

- MacDonald, D.D., C.G. Ingersoll, and T.A. Berger. 2000. Development and evaluation of consensus-based sediment quality guidelines for freshwater ecosystems. *Archives of Environmental Contamination and Toxicology* 39:20-31.
- MacDonald, D.D., C.R. Steward, and E.E. Knudsen. 2000. One Northwest Community - People, Salmon, Rivers, and the Sea: Towards Sustainable Fisheries. *In: E.E. Knudsen, C.R. Steward, D.D. MacDonald, J.E. Williams, and D.W. Reiser (Eds.). Sustainable Fisheries Management: Pacific Salmon.* CRC Press. Boca Raton, Florida.
- MacDonald, D.D., L.M. DiPinto, J. Field, C.G. Ingersoll, E.R. Long, and R.C. Swartz. 2000. Development and evaluation of consensus-based sediment effect concentrations for polychlorinated biphenyls (PCBs). *Environmental Toxicology and Chemistry* 19:1403-1413.
- Kemble, N.E., D.G. Hardesty, C.G. Ingersoll, B.T. Johnson, F.J. Dwyer, and D.D. MacDonald. 2000. An evaluation of the toxicity of contaminated sediments from Waukegan Harbor, Illinois following remediation. *Archives of Environmental Contamination and Toxicology* 39:452-461.
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- Knudsen, E.E., C.R. Steward, D.D. MacDonald, J.E. Williams, and D.W. Reiser (Eds.). 2000. *Sustainable Fisheries Management: Pacific Salmon.* CRC Press. Boca Raton, Florida.
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- Milburn, D., D.D. MacDonald, T.D. Prowse, and J.M. Culp. 1999. Ecosystem Maintenance Indicators for the Slave River Delta, Northwest Territories, Canada. *In: Y.A. Pykh, D.E. Hyatt, and R.J.M. Lenz (Eds.). Environmental Indices: Systems Analysis Approach.* ISBN 0 9534944 0 3. EOLSS Publishers Co. Ltd. Oxford, United Kingdom.
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- Long, E.R. and D.D. MacDonald. 1998. Recommended uses of empirically derived, sediment quality guidelines for marine and estuarine ecosystems. *Human and Ecological Risk Assessment* 4(5):1019-1039.

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- Solomon, K.R., G.T. Ankley, R. Baudo, G.A. Burton, C.G. Ingersoll, W. Lick, S. Luoma, D.D. MacDonald, T.B. Reynoldson, R.C. Swartz, W.J. Warren-Hicks. 1997. Work group summary report on methodological uncertainty in sediment ecological risk assessment. *In: C.G. Ingersoll, T. Dillon, and R.G. Biddinger (Eds). Ecological Risk Assessment of Contaminated Sediment. Pensacola Florida: SETAC Press. p. 271-296.*
- Zarbock, H., J. Schulten, E. Long, and D.D. MacDonald. 1997. Sediment contamination in Tampa Bay: Sources, risks, and management. *Tampa Bay BASIS3 Proceedings.*
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- Long, E.R., D.D. MacDonald, S.L. Smith, and F.D. Calder. 1995. Incidence of adverse biological effects within ranges of chemical concentrations in marine and estuarine sediments. *Journal of Environmental Management* 19(1):81-97.
- Porter, E.L., R.A. Kent, D.E. Andersen, K.A. Keenleyside, D. Milne, P. Cureton, S.L. Smith, K.G. Drouillard, and D.D. MacDonald. 1995. Development of proposed Canadian Environmental Quality Guidelines for cadmium. *Journal of Geochemical Exploration* 52:205-219.
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- Powles, H. and D. MacDonald. 1994. Development of a Canadian office for the American Fisheries Society. *Fisheries* 19(2):30-31.
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- Caux, P.-Y., R.A. Kent, G.T. Fan, C. Grande, and D.D. MacDonald. 1994. Bromoxynil. *In*: P.Y. Caux and R.A. Kent (Eds.). *Canadian Water Quality Guidelines for Pesticides and Industrial Substances*. Canadian Association on Water Quality. Monograph Series No. 4:63-112.
- Caux, P.-Y., R.A. Kent, G.T. Fan, C. Grande, and D.D. MacDonald. 1994. Dimethoate. *In*: P.Y. Caux and R.A. Kent (Eds.). *Canadian Water Quality Guidelines for Pesticides and Industrial Substances*. Canadian Association on Water Quality. Monograph Series No. 4:113-164.
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- Caux, P.-Y., R.A. Kent, M. Tache, C. Grande, G.T. Fan, and D.D. MacDonald. 1994. Environmental fate and effects of dicamba: A Canadian perspective. *Reviews of Environmental Contamination and Toxicology* 133:1-58.
- MacDonald, D.D. and C.P. Newcombe. 1993. Effects of suspended sediments in aquatic ecosystems: A clarification of the stress index model. *North American Journal of Fisheries Management* 13(4):873-876.
- Marshall, T.R. and D.D. MacDonald. 1992. Expanding the role of the American Fisheries Society in Canada: The issues, recent initiatives, and future strategies. *Fisheries* 17(4):28-31.
- Newcombe, C.P. and D.D. MacDonald. 1991. Factors affecting the impacts of suspended sediments on aquatic ecosystems: Concentration and duration of exposure. *North American Journal of Fisheries Management* 11:72-82.
- MacDonald, D.D. and T.R. Marshall. 1990. Canadian members of the AFS: Do we really belong? *Fisheries* 11(4):63-67.
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- MacDonald, D.D. and L.E. McDonald. 1987. The influence of surface coal-mining on potential salmonid spawning habitat in the Fording River, B.C. *Water Pollution Research Journal of Canada* 22(4):584-595.

Mommsen, T.P., J. Ballantyne, D.D. MacDonald, J. Gosline and P.W. Hochachka. 1981. Analogues of red and white muscle in squid mantle. *Proceedings of the National Academy of Sciences USA* 78(5):3274-3278.

#### *Technical Reports*

MacDonald, D.D., D.E. Smorong, C.G. Ingersoll, J.M. Besser, W.G. Brumbaugh, N. Kemble, T.W. May, C.D. Ivey, S. Irving, and M. O'Hare. 2009. Development and evaluation of sediment and pore-water toxicity thresholds to support sediment quality assessments in the Tri-State Mining District (TSMD), Missouri, Oklahoma, and Kansas. Draft Final Technical Report. Volume I: Text. Submitted to United States Environmental Protection Agency (USEPA). Region 6, Dallas, Texas, Region 7, Kansas City, Kansas, and US Fish and Wildlife Service, Columbia, Missouri. Submitted by MacDonald Environmental Sciences Ltd., Nanaimo, British Columbia. United States Geological Survey, Columbia, Missouri, and CH2M Hill, Dallas, Texas.

MacDonald, D.D., D.E. Smorong, C.G. Ingersoll, J.M. Besser, W.G. Brumbaugh, N. Kemble, T.W. May, C.D. Ivey, S. Irving, and M. O'Hare. 2009. Development and evaluation of sediment and pore-water toxicity thresholds to support sediment quality assessments in the Tri-State Mining District (TSMD), Missouri, Oklahoma, and Kansas. Draft Final Technical Report. Volume II: Appendices 1 through 4. Submitted to United States Environmental Protection Agency (USEPA). Region 6, Dallas, Texas, Region 7, Kansas City, Kansas, and US Fish and Wildlife Service, Columbia, Missouri. Submitted by MacDonald Environmental Sciences Ltd., Nanaimo, British Columbia. United States Geological Survey, Columbia, Missouri, and CH2M Hill, Dallas, Texas.

MacDonald, D.D. and P.F. Landrum. 2008. An Evaluation of the Approach for Assessing Risks to the Benthic Invertebrate Community at the Portland Harbor Superfund Site. Preliminary Draft. Prepared for United States Environmental Protection Agency, Region 10, Seattle, Washington 9 and Parametrix, Inc. Albany, Oregon. Prepared by MacDonald Environmental Sciences Ltd., Nanaimo, British Columbia and Landrum and Associates, Ann Arbor, Michigan.

MacDonald, D.D., B. Zajdlik, K. Racher, M. Culhane, and J. Arsenault. 2008. Guidelines for Designing and Implementing Aquatic Effects Monitoring Program for Development Projects in the Northwest Territories: Overview Report. Prepared for Indian and Northern Affairs Canada. Yellowknife, Northwest Territories. Prepared by MacDonald Environmental Sciences Ltd. Nanaimo, British Columbia and Zajdlik & Associates Inc. Rockwood, Ontario.

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Department of the Interior. Washington, District of Columbia and Emergency Response Team. United States Environmental Protection Agency. Edison, New Jersey. Prepared by MacDonald Environmental Sciences Ltd. Nanaimo, British Columbia.

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