UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
WASHINGTON, D.C. 20240
http://www.blm.gov

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EMS TRANSMISSION 09/13/2005
Instruction Memorandum No. 2005-231
Expires: 09/30/2006

To: State Directors
Attn: Abandoned Mine Land and Hazardous Materials Management Coordinators

From: Assistant Director, Minerals, Realty and Resource Protection

Subject: Identification of Hazardous Sites Near Populated and High-Use Areas

Purpose: This instruction memorandum (IM) implements a strategy whereby the Bureau of Land Management (BLM) will assess its lands to identify hazardous sites in close proximity to populated areas, apprise management of the extent of associated safety hazards, and develop a resource request to fund mitigation and remediation actions.

Policy/Action: It continues to be the policy of the BLM to mitigate safety hazards stemming from abandoned mines and other hazardous sites on the public lands, subject to available funding. In March 2005, the Office of Inspector General issued a Flash Report (No. C-IN-BLM-0013-2005) on Public Safety Issues at the Saginaw Hill Property in which it identified the need for the BLM to be more proactive in fulfilling this policy. In response, the BLM committed to develop a report on what resources will be needed to identify hazardous sites in close proximity to populations. This IM establishes a bureauwide process by which the BLM will conduct an assessment to identify hazardous sites on the public lands that are in close proximity to populated areas and other high-use areas.

The assessment will be based on data provided by Geographic Information Systems (GIS) and readily available information, databases, and knowledge that Field Office personnel may have. Based on the assessment, State and Field Offices are requested to develop cost estimates for remediating known site safety hazards. On-site field validation is not necessary at this time, however State and Field Offices may conduct such activities if they so choose.

The Washington Office will compile the information submitted from the State Offices in order to develop a proposed resource request. Further details about the strategy are attached.

Timeframe: Cost estimates are due to the Washington Office by March 31, 2006.

Budget Impact: This collaborative effort will provide management with information needed to develop a resource request to fund field validation and hazard remediation actions.

Background: This IM is being issued in accordance with the BLM's commitment to the Office of Inspector General (IG) made in response to the Saginaw Hill Flash Report. Saginaw Hill is an abandoned mine located in the area of Tucson, Arizona that the IG visited. Saginaw Hill contains numerous open shafts and mine waste with high metal content within a short distance of a public school and new housing development. Based on its visit, the IG recommended that the BLM should assess its lands to identify hazardous sites in close proximity to populated areas similar to Saginaw Hill, inspect these sites and take appropriate action to mitigate any safety hazards. In response, the BLM committed to develop a report on what resources will be needed to identify hazardous sites in close proximity to populations.

Manual/Handbook Sections Affected: None.

Coordination: This IM has been coordinated with State Office AML and Hazard Management Program Coordinators. In addition, the Colorado State Office served as a pilot to test the strategy.

Contact: Questions concerning the policy and overall approach should be directed to George Stone, AML Program Lead, Protection and Response Division, (WO-360) at 202-557-3573 or Miyoshi Stith, Hazard Management Program Lead, Protection and Response Division (WO-360) at (202) 557-3578. GIS-based questions should be directed to Jerry Olson, Oregon State Office, (509) 250-1903 or John Reitsma, Land and Resources Projects Office (WO-330-D) at (303) 236-1984.

Signed by:
Tom P. Lonnie
Assistant Director
Minerals, Realty and Resource Protection

Authenticated by:
Barbara J. Brown
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2 Attachments
1 – State and Field Office Process – (2 pp)
2 – Hazardous Site Report Template – (1 p)

State and Field Office Process

General Instructions

The Washington Office will provide each State Office an Excel spreadsheet showing Abandoned Mine Land (AML) and/or Hazardous Material (Hazmat) sites on or adjacent to BLM land that have been identified by GIS as being located within one mile of a populated place (PPL) or high-use area.

The GIS data sets will be drawn from:

- BLM Abandoned Mine Module (AMM)
- BLM Site Cleanup Module (SCM)
- USGS Mineral Industry Location System (MILS) database
- USGS Geographic Names Information System (GNIS) for mine sites
- Data for PPL's will include schools, parks, and generic populated places compiled from the GNIS and screened Recreation and Admin Sites on BLM land.

State and Field Offices are to apply their information and knowledge of local areas to review and revise the information on the spreadsheet *and* in the AMM and/or SCM databases. For example:

- The hazard site may exist but is not in AMM or SCM and needs to be added.
- The reported facility may no longer exist or be in use (e.g., a school building may have been closed).
- The reported hazardous site location may be based on incorrect spatial data (e.g., it may not be on BLM-managed land or not in close proximity to a populated or high-use area).
- The populated or high-use area spatial data may be incorrect.
- The site's safety hazards may have already been remediated or scheduled for remediation.

Recommended Methodology

- For those sites remaining after the initial screening process, additional data from Field Office files, maps and GIS procedures should be used to further assess site status.
- One process is to convert the spreadsheet into a database (DBF) file in order to create a shapefile or layer in ArcGIS. Open the shapefile and bring up the associated topographic map layer in the background. This approach can provide additional insight as to whether the site(s) is located correctly.
- Similarly, additional available data layers can be applied, such as GIS data from State AML and Hazard Management agencies.
- Note: Many of the MILS mine site locations have a large variance in accuracy due to the source of data and both MILS and AMM/SCM data may be projected in a different datum which could lead to errors of up 100 meters.

- Lastly, modify the spreadsheet as follows:
    - Where hazard sites are found to be in proximity to a populated or high-use area based on readily available information, provide a Description, Proposed Action, and Estimated Cost. Refer to Attachment B for examples.
    - In situations where an on-site inspection is needed to make a determination about the site's existence, location, or possible safety hazard, provide a cost estimate for conducting the site visit.
    - Where the link between the populated or high-use area and the site is invalid due to erroneous spatial information, provide an explanation for the determination and take appropriate action to update AMM/SCM.
    - Where the GIS-based link is valid, but other information indicates that the site does not pose a danger, provide the explanation on the spreadsheet and update AMM/SCM as appropriate.

State Offices are requested to consolidate their Field Office reports and forward their information to WO-360 using the electronic version of the Report Template in Attachment 2. State Offices with multiple States under their jurisdiction should submit a consolidated list.

WO will compile the information into a bureauwide report and develop a refined GIS product as part of the national AML and Hazard Management program strategies.