

Mike McCrum  
Red Devil Mine Project Manager  
BLM Anchorage Field Office  
4700 BLM Road  
Anchorage, AK 99507  
907-271-4426

December 12, 2020

Dear Mr. McCrum

The following comments are respectfully submitted on behalf of the Native Village of Georgetown (NVG) and the Georgetown Tribal Council (GTC) regarding the Bureau of Land Management's (BLM) public review process for the proposed plan to remediate the abandoned Red Devil Mine (RDM).

The Georgetown Tribal Council considers the cleanup of RDM imperative as Georgetown itself lies roughly 16 miles downriver of RDM (Figure 1). The Native Village of Georgetown also includes several residents of Red Devil among its membership. While the GTC is pleased to see progress move forward on a plan to remediate RDM, the GTC also has some reservations concerning the Bureau of Land Management's preferred alternative. Residents of Red Devil who are Tribal members of the NVG are also concerned with the mine waste at RDM. They are concerned that any action at the mine will further the spread of toxic material due to the remedial work at RDM.

As outlined in the Bureau of Land Management's Red Devil Mine Proposed Plan (Feb. 2020) the BLM has reviewed several methods to remediate the abandoned Red Devil Mine, and has selected SW3C as its preferred alternative. While SW3C is a very robust plan of action that will inter the remainder of the mine waste; Respectfully, the Georgetown Tribal Council remains unconvinced that the BLM's preferred alternative is the best alternative for Georgetown's tribal members in the area and residents of the Kuskokwim River. The GTC is concerned that if the mine waste is interred at RDM instead of removed, the waste will

continue to pose a threat to human health and the environment. The Native Village of Georgetown is concerned that interring the mine waste will lead to an unnecessary risk of exposure in the future. The risks that the GTC are most concerned with is the potential for runoff water to penetrate the repository, and the risk of an accidental catastrophic failure of the repository in the long-term.

The Georgetown Tribal Council prefers alternative SW4 for the remediation of the site as it is the only alternative that removes the waste at the site and provides a permanent solution that protects the residents of the Kuskokwim river from the mine waste at RDM. The Native Village of Georgetown acknowledges the extraordinary cost of alternative SW4, however The GTC sees the expense of alternative SW4 as an investment in the future. The NVG also acknowledges the risk in transporting the RDM waste such a long distance, the NVG is confident in the BLM's ability to mitigate these risks and safely transport the waste materials to its remediation facility.

Thank you for your consideration of these comments. Please see the attached resolution 20-10 dated 12/12/2020. Should you require any additional clarification or information, please do not hesitate to contact at the phone number listed below.

Thank you,

Traci Maczynski  
Council Chairperson  
Georgetown Tribal Council

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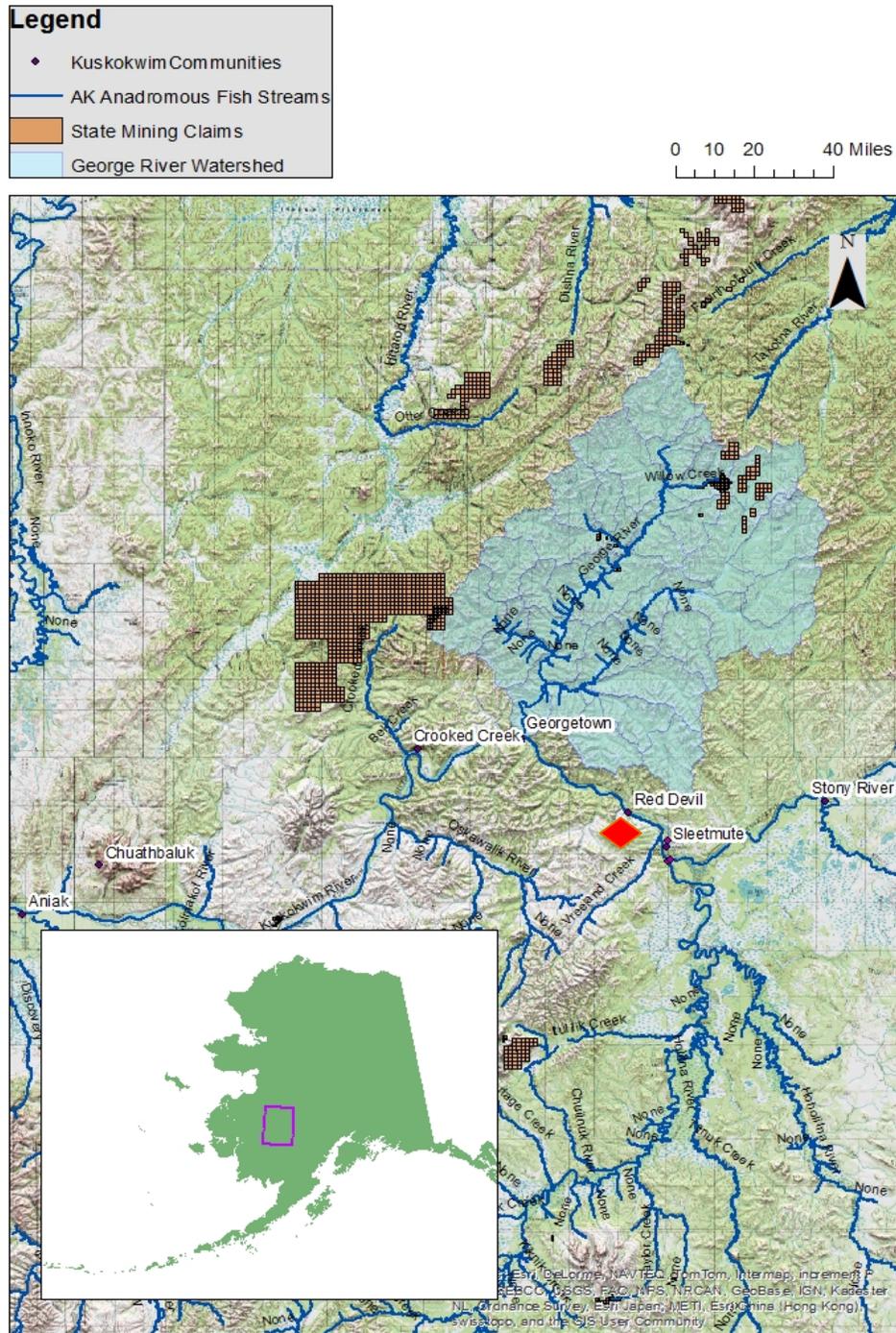


Figure 1: Georgetown location as related to Red Devil Mine site

◆ **Abandoned Red Devil Mercury Mine**