

ADDENDUM

Red Devil Mine RI/FS

Community Involvement Plan

December 2010

INTRODUCTION

The Bureau of Land Management (BLM) is conducting a Remedial Investigation/Feasibility Study (RI/FS) at the site of the Red Devil Mine (RDM), in southwestern Alaska. The RI/FS is being conducted in a manner that is consistent with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). The RI/FS results will be used to assess potential risks to human health and the environment arising from past mining activities, and identify remedial action alternatives. The BLM is coordinating RI/FS activities with the Alaska Department of Environmental Conservation (ADEC) and the U.S. Environmental Protection Agency (EPA).

The BLM established the framework for a public dialog regarding environmental action at RDM during the first half of 2010. A Community Involvement Plan (CIP) for the RDM RI/FS was finalized in June 2010. During preparation of the CIP, the BLM contacted 35 tribes, cities, village corporations, and community organizations from Bethel to Lime Village to offer tribal consultations and community meetings. The BLM then conducted a series of tribal consultations and community meetings in 9 villages along the Kuskokwim River between April and June 2010 to inform the public of BLM's plan to conduct an RI/FS. During those meetings, a general schedule for the RDM RI/FS was presented and communities provided feedback on when they would like additional briefings.

COMMUNICATION GOALS

CERCLA Sec. 117 requires that agencies conduct public participation before adopting any plan for remedial action. Separately, Executive Order 13175 - Consultation and Coordination with Indian Tribal Governments, requires that agencies consult and coordinate with tribes when developing and implementing "policies that have tribal implications" or "substantial direct effects on tribes." The June 2010 CIP and this Addendum detail the actions the BLM will perform to seek both public and tribal input, as required by CERCLA and Executive Order 13175.

During the RI planning process, the EPA requested that BLM provide local tribes and communities with the opportunity to review and comment on the RI work plan. The BLM has agreed to make the RI work plan available to the public for comment.

This Addendum describes actions and activities the BLM will use to facilitate review and comment on the RI work plan by tribes, communities and other groups. The general schedule included in the Action Plan provides for receipt and incorporation of comments as part of the larger RI work plan finalization effort. The actions presented in this addendum are specifically designed to facilitate review of the RI work plan and continue to consult with tribes and engage and inform interested tribes and communities in a manner that is consistent with the approach adopted in the CIP.

SITE DESCRIPTION

The RDM is an abandoned cinnabar mine and mercury production facility, located on the Kuskokwim River between the communities of Red Devil and Sleetmute. The mine site straddles the lower reach of Red Devil Creek, and extends to the bank of the Kuskokwim River. The mine was operated from 1933 to 1971. A caretaker lived at the mine for several years after the most recent mining activity, but eventually the site was abandoned. At the end of its life, the mine consisted of a series of underground workings, open shafts and adits, mine process buildings, a power plant, above-ground fuel tanks, living quarters and a reservoir in the upper reach of Red Devil Creek. Over the last 20+ years, the BLM has closed the shafts and adits, demolished onsite buildings and tanks, and disposed of the demolition debris in onsite repositories. Tailings and waste rock deposited along Red Devil Creek as part of mining operations remain in place, along with extensive surface disturbance in the upper elevations on the northeast side of the mine process area and an old barge landing at the mouth of Red Devil Creek. These remaining features are a primary focus of the RI/FS at RDM.

PUBLIC REVIEW PROCESS

The RI work plan review process will utilize the approach adopted in the CIP by coordinating with communities located along the Kuskokwim River using products that promote exchange of information. The steps that BLM will use to facilitate public review and comment are defined in an action plan along with a schedule that is linked to the broader schedule for RI work plan finalization.

TARGET AUDIENCES

In accordance with CERCLA Sec. 117 and Executive Order 13175 - Consultation and Coordination with Indian Tribal Governments, the BLM will consult and/or engage the following:

- Tribal Consultation:
 - Federally recognized tribes (see June 2010 CIP, Appendix A)
- CERCLA public participation:
 - City governments (June 2010 CIP, Appendix A)
 - ANCSA village corporations, The Kuskokwim Corporation, and Calista Corporation

- Kuskokwim Native Association
- Yukon-Kuskokwim Health Corporation
- Kuskokwim River Watershed Council
- Interested community members, including Red Devil People and Community, Inc.

PRODUCTS

- Red Devil Mine mail list
- Red Devil Mine project newsletters
- Consultation letters
- Newspaper ads in *Tundra Drums* and *Delta Discovery*
- Radio PSAs
- Flyers in local communities
- Individual tribal consultations
- Community meetings
- Regional workshop (if desired)
- Feature articles in BLM agency newsletter
- BLM op/ed in *Tundra Drums* (local media)
- Red Devil Mine Web site
- PowerPoint presentations/briefings
- Meeting handouts
- Map products

ACTION PLAN

The BLM will perform the following actions to engage and inform interested tribes, village corporations, city representatives, and community members as the Red Devil Mine Remedial Investigation continues. Additional action items may be added as necessary during the ongoing tribal and community involvement process.

| Audience | Action | Date |
|---|--|---------------|
| <ul style="list-style-type: none"> ● Federally recognized tribes, city governments, and village corporations (Bethel to Lime Village) ● The Kuskokwim Corporation ● Calista Corporation ● Yukon-Kuskokwim Health Corp. ● Kuskokwim Native Association ● Kuskokwim River Watershed Council ● Red Devil People & Community, Inc. | Red Devil Mine project newsletter #2: <ul style="list-style-type: none"> ● 2010 field work ● status of fish and aquatic insects sampling ● Remedial Investigation Draft Work Plan | December 2010 |

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| Same as above | Letters of invitation for tribal/government-to-government consultations, community meetings, and/or regional workshops. Follow up with phone contact within 14 days to identify process for review and comment on RI Draft Work Plan. | January 2011 |
| Residents of Bethel and Yukon-Kuskokwim Delta | <ul style="list-style-type: none"> • Newspaper ads in <i>Tundra Drums</i> and <i>Delta Discovery</i> to publicize schedule of community meetings and/or regional workshop(s). • Radio PSAs and flyers for posting in local communities. | March 2011 |
| Same as above | Implement the review and comment process, which will include a combination of tribal/government-to-government consultations, community meetings, and/or regional workshop(s), at the discretion of local communities. | March 2011 |
| Same as above | <ul style="list-style-type: none"> • Follow-up letters to tribal, city and community leaders who participated in consultations, meetings, and/or workshops • Formal response letters to written comments on the RI Draft Work Plan | Within 30 days of meeting or consultation |
| Residents of Bethel and Yukon-Kuskokwim Delta | BLM opinion/editorial in <i>Tundra Drums</i> (rural weekly serving Y-K Delta) | Spring or summer 2011 |
| BLM-Alaska <i>Frontiers</i> mail list; BLM-Alaska web visitors | Feature article in BLM agency newsletter | Spring or summer 2011 |
| <ul style="list-style-type: none"> • Federally recognized tribes, city governments, and village corporations (Bethel to Lime Village) • The Kuskokwim Corporation • Calista Corporation • Yukon-Kuskokwim Health Corp. • Kuskokwim Native Association • Kuskokwim River Watershed Council • Red Devil People & Community, Inc. | Red Devil Mine project newsletter #3: <ul style="list-style-type: none"> • summarize consultations, community meetings, and/or regional workshops • announce availability of RI Final Work Plan and fish contaminant report | Summer 2011 |
| Web visitors | Red Devil Mine Web page and online Administrative Record | Ongoing |