



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

March 21, 2014

Dear Mike,

These comments are being submitted on behalf of the Native Village of Georgetown, as part of the public review process for the Engineering Evaluation/Cost Analysis (EE/CA) that the Bureau of Land Management (BLM) developed for the Red Devil Mine site and published on February 19, 2014 (Delivery Order Number: L09PD02160). The Native Village of Georgetown is situated in southwest Alaska in the valley of the middle Kuskokwim River amid the Kilbuck-Kuskokwim Mountains, just down river from the abandoned mercury mine site known as Red Devil Mine (RDM). Figure 1 shows the spatial relationship of Georgetown to the RDM site location.

The Georgetown Tribal Council (GTC) has been collecting baseline water quality data on both the George River and the Kuskokwim River since 2007. The Native Village of Georgetown believes the quality of the water is essential to both the fish and wildlife in the area, as well as the people who live in communities on the Kuskokwim River. Sediment sampling results from the investigation conducted by the BLM indicate that mine tailings are migrating into the Kuskokwim River via Red Devil Creek, and this is a major concern to the Native Village of Georgetown. A baseline risk assessment conducted during the Remedial Investigation also concluded that tailings/waste rock, soil, and Red Devil Creek sediment "pose potential risks to human and ecological receptors". It is therefore imperative that the RDM site gets cleaned up as soon as possible.

It is our understanding that the BLM is planning an action for 2014 that is intended to prevent tailings from continuing to erode into Red Devil Creek and migrate to the Kuskokwim River. The Early Action planned for 2014 will halt the spread of tailings during the interim period between the RI/FS and the sitewide remedial action. The RDM site has been being "cleaned up" since the first investigations and cleanup actions at RDM took place in the 1970s. *The first concern that the GTC would like to express is that the site wide clean up will be prolonged after completing the "early action" phases.* This Early Action is important, but just a starting point. How long after the "early action" phase is complete will BLM wait to continue with cleaning up the mine site? Will funding be available? What is being done to ensure that the timeline holds fast and funding will be available?

In the EE/CA, four alternatives were considered for the project, including:

1. Alternative 1 – No Action
2. Alternative 2 – Channelization and Line Creek with Solidifying Concrete Cloth
3. Alternative 3 – Line Creek with Culvert
4. Alternative 4 – Excavate Red Devil Creek Sediment

The BLM has chosen Alternative 4, which as described in the Executive Summary of the EE/CA, "involves the excavation of sediment within the portion of Red Devil Creek that extends through the Main Processing Area, which has been identified as actively eroding and containing contaminated sediments. It also involves regrading tailings on the south side of the creek in the Main Process Area to prevent future erosion." Based on information provided by the BLM at an informational meeting with the GTC on February 1, 2014, we also understand that this alternative would include building some type of barriers on either side of creek, as well as the installation of a settling trap at the end of the creek to catch any materials that get by.

The GTC believes it is important that the tailings at the mine site be cleaned up. The GTC is in support of the Early Action taking place in the summer of 2014. It is understood that this is the "early action" phase of the cleanup process, which is only going to do a minimal amount of cleanup to deal with the current tailings that are eroding into the creek which then trickles down into the Kuskokwim River. As stated previously, the GTC hopes that sitewide cleanup will take place within the next several years, rather than after an extended period of time.

The GTC agrees with the EE/CA that Alternative 4 seems like the best way to go about minimizing the current issue. The BLM plans to move contaminated soils to higher ground and that's where the second concern comes in – *putting the contaminated soil on higher ground increases the potential of runoff from carrying these contaminants to lower elevations, and back into the creek and/or river.* How will these tailings be covered? Will the material being used prevent rainfall and snow melt runoff from carrying the contaminants with it? The GTC would like the BLM to ensure that after re-locating the tailings to higher ground, appropriate consideration is taken to what is done with it to prevent exposure to the elements.

Thank you for your consideration of these comments. Please see the attached resolution of support dated March 21, 2014. Should you require any additional clarification or information, please do not hesitate to contact at the phone number listed below.

Thank you,



David Kutch, Jr.  
Council President

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# Georgetown, Alaska

**Legend**

- ◆ Kuskokwim Communities
- AK Anadromous Fish Streams
- State Mining Claims
- George River Watershed

0 10 20 40 Miles

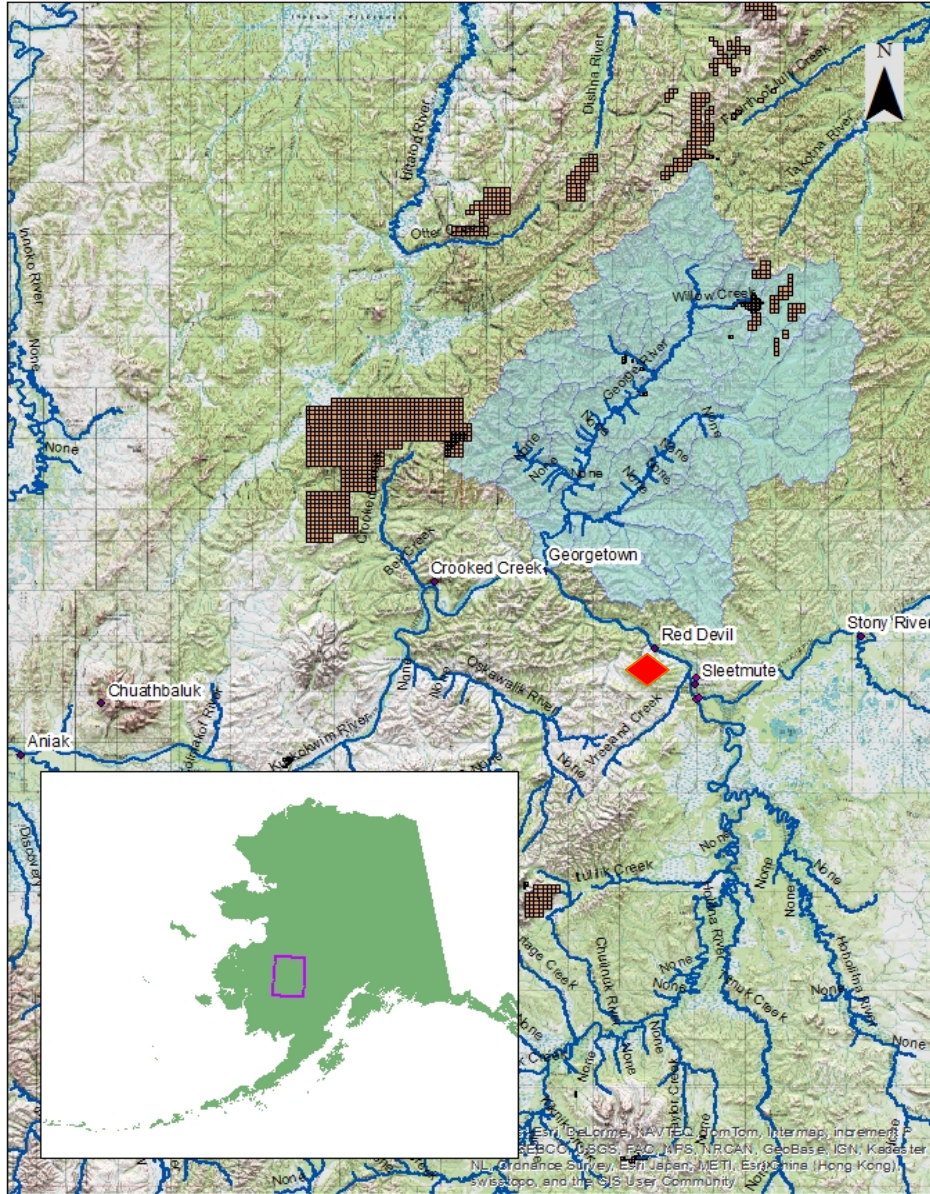


Figure 1: Georgetown location as related to Red Devil Mine site

◆ **Abandoned Red Devil Mercury Mine**



## RESOLUTION 14-06

### **A RESOLUTION SUPPORTING THE SUBMISSION OF PUBLIC COMMENTS TO THE BUREAU OF LAND MANAGEMENT (BLM) IN RESPONSE TO THE RED DEVIL MINE SITE PROPOSED EARLY ACTION & ENGINEERING EVALUATION/COST ANALYSIS (EE/CA)**

WHEREAS: The Georgetown Tribal Council is a federally recognized Tribal governing body for the Native Village of Georgetown; and

WHEREAS: Our Tribe works closely with Federal agencies, Tribes and Regional Native organizations in the Kuskokwim River region in an effort to protect our environment and human health; and

WHEREAS: The traditional fishing and hunting grounds around Georgetown and all along the Kuskokwim River are of great importance to our people and any decisions made by the BLM should consider and protect those locations; and

WHEREAS: The members of the Native Village of Georgetown wish to ensure the continued health and protection of water quality of the Kuskokwim River; and

WHEREAS: Georgetown Tribal Council deems it appropriate that our comments be addressed by the BLM, with the goal that they will help in protecting the natural resources along the Kuskokwim River for current and future generations to enjoy safely.

NOW, THEREFORE BE IT RESOLVED that the Georgetown Tribal Council hereby approves and supports these public comments, dated 03/21/2014, for the aforementioned EE/CA for the Red Devil Mine Site, which was published by the BLM on February 19, 2014.

### **CERTIFICATION**

The foregoing resolution was adopted by the Georgetown Tribal Council and passed this 21<sup>st</sup> day of March 2014 by 4 in favor and 0 against and 1 absent.

A handwritten signature in blue ink, appearing to be "X" or a similar stylized mark.

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President David Kutch Jr.