

Coeur d'Alene Basin Five-year (2006-2010) Work Plan

INTRODUCTION

This plan for calendar years 2006-2010 covers environmental cleanup and improvement activities in the Coeur d'Alene Basin planned by the Basin Environmental Improvement Project Commission (BEIPC) and cooperating agencies and governments in accordance with responsibilities as stated in the Memorandum of Agreement establishing the BEIPC. This plan has been prepared by the Technical Leadership Group (TLG) and the Executive Director with review by the Citizen Coordinating Council (CCC), and is based on their recommendations for activities and work to be performed in CY 2006 - 2010. Annual work plans will address specific actions from this five-year plan. This proposed five-year work plan is organized as follows:

Part 1 – Work Funded with Superfund or Other Cleanup Monies

Part 2 – Activities and Work Funded Through the Clean Water Act (CWA) Grant Program

Part 3 – Other BEIPC Activities and Responsibilities

Part 1 includes work to implement the Operable Unit (OU) 3 Record of Decision (ROD) with funding provided by the U.S. Environmental Protection Agency (EPA's) Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Superfund program or other environmental cleanup funding. The OU3 ROD identifies approximately \$350 million of remedial actions in the State of Idaho as well as about \$10 million in cleanup actions in the State of Washington. For planning purposes a 30-year period of remediation was anticipated. Except for establishing the human health remedy as a top priority, the ROD does not address the sequence of actions.

Part 2 addresses the work to be accomplished with CWA Grant funding. In Fiscal Years 2002, 2003, and 2004, funding under the CWA was provided for the BEIPC to be used for *"...research, investigation, experiments, training, demonstrations, surveys, and studies related to the causes, effects, extent, prevention, reduction, and elimination of pollution."*

Part 3 includes work and responsibilities the BEIPC has assumed based on recommendations from the National Academy of Sciences (NAS) Study and requests from the citizens and communities of the Basin.

PART 1 – OU3 ROD WORK FUNDED WITH SUPERFUND OR OTHER CLEANUP FUNDING

Funds made available through EPA's CERCLA appropriations are available for environmental remediation on privately owned lands and state, county and local government owned properties. EPA's CERCLA funds cannot be used for cleanup of sites on public (Federal) land. Work

proposed on public lands is the responsibility of the federal land management agencies. The State of Idaho may also supply funding through the Idaho Department of Environmental Quality (IDEQ) for environmental cleanup activities.

For Part 1, the scope of the proposed five-year work plan corresponds generally to the level of funding and the funding sources anticipated over the five-year period, 2006-2010. The 2006-2010 workplan proposes a cleanup approach and a listing of priority projects for the 5-year planning period. The proposal includes the following OU3 ROD work to be funded with Superfund or other cleanup monies:

- Evaluation of OU3 Removal Actions
- Development of Repositories
- Development and implementation of the Institutional Controls Program
- Remediation in the Residential and Community Areas
- Remediation of Drinking Water Supply Problems
- Remediation in Lower Basin Recreational Use Areas
- Remediation of Mine and Mill Sites in the Upper Basin
- Preliminary ecological actions in the Upper Basin
- Preliminary ecological actions in the Lower Basin
- Basin Environmental Monitoring

Table 1-1 is a summary of activities proposed for 2006-2010 to be funded with Superfund or other cleanup monies. More detailed descriptions of the activities follow the summary table.

Table 1-1 Summary of Activities Proposed for Implementation of the ROD for 2006-2010

Proposed Activity	Scope	Objective	Lead Agency
Evaluation of OU3 Removal Actions (see EPA 5-year Review Report)	Various parties have performed CERCLA removal actions. Results of these activities need to be evaluated and if warranted, incorporated into the OU3 remedial action program.	Complete evaluation of these sites in context of the ROD and its schedule and incorporate into remedial action program as warranted.	EPA, IDEQ, BLM, USDA Forest Service, CDA Tribe

Proposed Activity	Scope	Objective	Lead Agency
Repositories	Develop, as needed, repositories to support remediation and Institutional Controls Program (ICP). Plan, secure properties and be ready for remediation and ICP waste in Upper and Lower Basin anticipated in the next 5-10 years.	Utilize Big Creek for Basin remediation and ICP waste. Finalize procurement of East Mission Flats site and make it operational in late 2006 or early 2007. Complete evaluation for potential acquisition of the Osburn Tailings Ponds site and acquire if appropriate. Outline needs for the ICP. Perform technical evaluations of other appropriate sites as they are identified. Complete transfer station evaluation for potential ICP needs.	IDEQ and EPA
Basin Institutional Controls Program (ICP)	Develop a program to manage activities in OU3 to protect remediated areas from recontamination and to protect human health and the environment.	Prepare a proposed ICP Rule in 2006 for presentation to the State Legislature for action during the 2007 Legislative session. Implement the rule after passage.	IDEQ
Residential and Community Area Sampling and Remediation	Protect human health by continuing property sampling and property remediation program.	Property sampling substantially complete by December 2009. Continue to protect human health by remediating 400-500 properties per year as funding allows and in a manner that minimizes community disruption.	IDEQ
Drinking Water Supply	Protect human health by providing adequate drinking water supplies by continuing the sampling and remediation program.	Program substantially complete by December 2009.	IDEQ

Proposed Activity	Scope	Objective	Lead Agency
Recreational Areas	Continue to identify contaminated recreation use areas along the CDA River and remediate areas or develop substitute clean areas. Develop a Lower Basin recreational management plan.	Complete contaminated recreation use area inventory. As funding is available, remediate use areas identified for continued use, construct substitute clean areas, and close areas no longer intended for use. Complete a Lower Basin recreational management plan.	EPA with state and federal land management agencies
Mine & Mill Sites	Cleanup priority sites that contribute to human health risks, are currently utilized for recreation activities, and contribute to water quality impacts. Continue to evaluate and prioritize additional mine and mill sites identified in OU3 ROD and prepare designs so remedial actions can be initiated as funds become available.	Complete remedial actions at Constitution tailings piles, Rex site, and Golconda site. Conduct remedial actions at additional identified sites as funds become available.	EPA, IDEQ. With BLM in Pine & Ninemile Creeks.

Proposed Activity	Scope	Objective	Lead Agency
Blood Lead Screening in Children	Explore alternative approaches to integrating universally available blood lead testing into the regular health care services received by Basin children aged 1-4 years with a part of the work being to identify an education outreach program. Such exploration will include examining alternative methods for implementing an integrated blood lead testing approach as reflected in those present in other states elsewhere in the nation. The goal will be to craft a two-year pilot program for the delivery of blood lead testing via this new approach. This goal may be modified.	EPA, IDEQ, IDOH, and PHD will continue to offer a universally available blood lead screening program in 2006. That program offers universal screening to children 0 to 6 years in age in the sense that screening is offered to all children for free and in the case of the Basin the program offers a \$20 incentive. Idaho Department of Health and Welfare, Division of Medicaid will work with participating physicians in the Basin to comply with requirements to perform blood lead screening during “well child checkups”. In addition, the TLG will also develop an approach to encourage and facilitate the provision of blood lead testing to children covered under Idaho’s Medicaid program.	IDEQ PHD

Proposed Activity	Scope	Objective	Lead Agency
Upper Basin Ecological Remedies	<p>Continue to evaluate approaches and technologies for water treatment in Canyon Creek that include pilot projects to develop design criteria and operational information. Remediate mine wastes along Denver Creek tributary to Pine Creek.</p> <p>Monitor previous remediation in East Fork of Ninemile, and water treatment pilot projects.</p> <p>Monitor existing growth media plots, assess biostabilization methods and develop media for capping waste material.</p> <p>Plan and prioritize remedial actions for other source areas.</p> <p>Develop lead cleanup goal for riparian soil.</p>	<p>Finalize development of water treatment approaches for surface and groundwater in Canyon Creek. Coordinate work with study performed under the CWA Grant Program. Continue to monitor completed remediation actions in Pine Creek. Complete Constitution, Rex, and Golconda site remediation and other projects noted under the Mine/Mill program for human health remedies. Prepare for remediation in future planning periods.</p>	<p>EPA and IDEQ. With BLM in Pine & Ninemile Creeks. USFWS has lead in soil cleanup standard.</p>

Proposed Activity	Scope	Objective	Lead Agency
Lower Basin Ecological Remedies	Develop a pilot project for conversion of agriculture land into waterfowl habitat. Complete a pilot project on soil amendment to reduce bioavailability of lead. Design wetland remediation approach. Perform numerical modeling of River processes and sediment. Collect data on river bank conditions and metal concentrations. Monitor bank stabilization pilot projects and evaluate effectiveness. Develop lead cleanup goal for riparian soil. Incorporate findings from AVISTA studies into remediation strategies.	Continue to implement the Lower Basin CWA sub-grant projects and monitor the results to have a better understanding of the complex and dynamic system in the Lower Basin. Complete development of the lead cleanup level for riparian soils. Continue EPA and USFWS collaboration on perpetual protection, conversion and remediation of agricultural land, followed by restoration to wetland habitat ecologically safe for use by waterfowl.	EPA, IDEQ, USFWS and Coeur d'Alene Tribe
Basin Environmental Monitoring	Continue to implement long-term monitoring and make results available via www.storet.org . Implement remedial action effectiveness monitoring as appropriate.	Assess effectiveness of remedial actions and trends in overall ecological improvement due to remediation and natural attenuation.	EPA working with other agencies including IDEQ, USFWS, and USGS

1.1 EVALUATION OF OU3 REMOVAL ACTIONS

Various parties have performed CERCLA removal actions in Basin sub-watersheds including Canyon, Ninemile, Pine, Moon, and Grouse Creeks and along the Upper South Fork and Lower Main Coeur d'Alene River to cleanup contamination, protect human health and restore ecological systems. Evaluate the results of these activities based on the OU3 ROD and if warranted, incorporate into the OU3 remedial action program. Continued monitoring is needed at a number of sites to protect the investment.

1.2 REPOSITORIES

Repository development is an ongoing process that must address the demand for waste disposal space generated by remedial actions and the Institutional Controls Program (ICP). IDEQ is taking the lead in developing repository options and the effort is coordinated with and funded by the EPA.

During 2006 and 2007, the Big Creek Repository (BCR) will continue to be used for the residential and community remediation program. Closure activities will begin for the BCR in

2008. This will require that in the latter part of 2007 a new repository site be on-line to accommodate the residential remediation program. The 2006 objective is to procure a site for both remediation and ICP activities in the Upper Basin and one in the Lower Basin. At least one of these sites must be operational in 2007. The purchase of the East Mission Flats site will be finalized and subsequently design work and site preparation will begin. It is anticipated that the site will be ready for acceptance of some wastes in fall of 2006 or early 2007. In order to provide an upper basin replacement repository for Big Creek Repository, technical evaluations will be completed for potential acquisition of a former tailings pond commonly referred to as Osburn Ponds.

IDEQ has identified several additional sites that are still in the preliminary evaluation stages. These sites will be presented to the BEIPC should they pass further evaluations. An ICP as outlined in Sub-section 1.3.1 will be developed. In order for the ICP to be adopted, an ICP contamination management strategy must be in place. The IDEQ and Panhandle Health District (PHD) will collaborate with EPA and local stakeholders to complete the waste management strategy in 2006. The entire evaluation will require knowledge of the long and short term needs of the communities that the ICP will support.

After development of the waste management strategy and completion of the long term O&M evaluation, additional identified sites will be evaluated for incorporation into the repository program to meet disposal needs in the Upper and Lower Basin anticipated within the next 5 to 10 years.

The current process established to meet disposal needs will be continued including: 1) site identification, 2) technical evaluation, 3) public input/notification and 4) decision documentation. IDEQ and EPA will continue to get input from local governments, landowners, and other stakeholders regarding candidate repository sites. In addition, the Repository project focus team (PFT) will continue to assist IDEQ and EPA with site identification and technical evaluation of specific sites according to guidelines in the ROD. Concurrent with this technical evaluation, a public outreach effort and comment period will be implemented for each proposal. Upon completion of the public outreach efforts, the decision documents and designs will be prepared and shared with the appropriate technical and community bodies of the BEIPC.

1.3 HUMAN HEALTH ISSUES

Remediation of human health exposures is a remedial action priority as defined in the OU3 ROD and includes developing and maintaining an ICP as outlined in Sub-section 1.3.1 and conducting cleanup in residential and community areas as well as recreational areas. The ROD also identifies mine and mill sites that are used for recreation and represent risks to human health. Priority mine and mill sites that are proposed for design and remediation in the next five years are described in this plan.

1.3.1 Institutional Controls Program

The ROD for OU3 states in Section 12, page 12-12 that institutional controls will be required to limit future exposures to contaminated soil left in place and groundwater not addressed by the

Selected Remedy. The ROD, Section 12, page 12-2 states that the Selected Remedy does not include remedial actions for Coeur d'Alene Lake. It also states that it is anticipated that the existing Institutional Controls Program (ICP) in the Box will be used as a model for the Basin. There are differences in CERCLA actions between the Box and Basin including diverse remedies enacted in the Basin such as the Union Pacific Railroad Response Action Maintenance Plan (RAMP) that necessitate changes to the Box ICP Model to make it consistent with the Basin ROD.

In 2006, the Human Health PFT will develop a draft Basin ICP and Administration Boundary Map and present them to the TLG for consideration. The TLG will review the recommendations and the TLG and PFT will make their recommendations to the BEIPC for consideration. The BEIPC will deliberate on the recommendations and make its recommendations to the EPA, IDEQ, and the Panhandle Health District (PHD) for consideration as they prepare a final draft ICP. PHD will submit the final draft rule to the Legislature for approval after review by the EPA and IDEQ for consistency with the intent of the ROD.

The objective for ICP completion is to have the ICP in place by July 2007.

Once the ICP rule is approved, it will be implemented and coordinated with the remedial and repository activities noted in other sections of the work plan.

1.3.2 Residential and Community Property Remediations

This subsection represents a large portion of the current "on the ground" work activities which directly implement the ROD. The residential and community property remediation program includes the following property types:

- Residential yards
- Rights of Way
- Commercial facilities
- Apartment complexes
- School grounds
- Trailer parks
- Common use areas

Much of the program management work is done in the year preceding actual remediation. This fact is especially true for soil sampling and analysis and property mapping. Each year the sampling program samples properties in anticipation of the next field season. It is anticipated that management planning in each year will be for up to 500 properties to be remediated in the next year.

The remediation program emphasizes the remediation of high risk properties where possible. High risk properties are those properties on which children less than 7 years of age and/or pregnant women reside and contamination levels exceed cleanup thresholds. In planning the remediation program in this 5-year period IDEQ will emphasize work in communities in the upper end of the Basin. Those communities include Mullan, Wallace, Osburn, Silverton, and the Canyon Creek Watershed (Burke Canyon). This community emphasis will continue for a

number of years moving down the Basin. In addition to the upper Basin properties it is necessary to remediate some properties in the Kingston/Rose Lake vicinity because they qualify as high risk.

Since 1989 approximately 3,700 properties have been remediated. This total is the sum of OU1&2 (Box) and OU3 (Basin). The total for the Basin at the beginning of 2006 is 798 properties. Average annual remediation goals for the next 5-year planning period are as follows:

- Remediate 400-500 properties
- Utilize multiple (2 or 3) remediation contractors
- Focus on High Risk properties
- Focus on properties in target communities
- Map 500 future properties for next year's work
- Sample and analyze soils for 800 properties

To track progress, an annual construction completion report has been and will continue to be prepared as the residential remediation program is implemented.

1.3.3 Recreational Use Areas

The OU3 ROD includes remediation of Lower Basin recreational use areas to reduce human exposure to lead and other metals. Some priority recreational use areas were identified in the ROD with the understanding that other recreational areas may be evaluated for cleanup based on factors such as risk of exposure, location and use.

Remediation and development principles were identified by the Recreational Area PFT for the initial one-year and five-year work plans. The following principles remain valid and appropriate for this 2006-2010 work plan:

- Primary objective is to protect human health, particularly young children and pregnant women.
- Work with impacted communities and local residents when considering recreational site development.
- Design to minimize long-term operation/maintenance costs and repository requirements.
- Create clean oases for public use (based upon community interests).
- "Reality check" of the scale and scope of what can be done.
- Build upon existing features to enhance use and reduce risks to human health.
- Provide enough amenities to attract folks to clean "safe" areas; do not create attractive nuisances or beautification-only projects.
- Design individual recreational sites to be consistent with an overall strategy for Basin recreational areas.

The PFT developed a two-stage approach to address recreational areas that continues to be valid.

Stage 1 – Recreational Areas Identified for Action - The first stage is remediation at existing publicly-owned recreational sites selected from those identified in the ROD. The areas proposed for remediation are existing recreation areas with a potential for a low-maintenance remedy that will be protective of human health.

Table 1-2 identifies recreational sites identified as candidates for action in the 2006-2010 planning period.

Table 1-2 Recreational Use Area Actions

Site Name	Land Manager/ Owner	Proposed Actions
Rainy Hill Boat Launch*	Forest Service	- 2006, pave existing boat launch parking area and establish paved picnic site near restrooms on north side of site. - Continue day use only limitation
Medimont Boat Launch Area and Rainy Hill Camping Area (on uncontaminated hill)*	Forest Service	- Evaluate potential for land exchange of sites for other natural resource lands and report results to BEIPC. If exchange possible, complete necessary documents and legal action by December 31, 2006. Continue day use only limitation. If land exchange not possible, continue to pursue funding to pave boat launch.
East of Rose Creek/West of Rose Lake	Forest Service	- Restrict access to contaminated dune area and install sign visible from river (current sign visible from road only).
Anderson Lake Boat Launch**	Idaho Dept. of Fish and Game	- Consider improvements in conjunction with Hwy 97 bridge replacement (scheduled for 2006-2008)

* The FS and State of Idaho are considering a potential land exchange for the State to acquire FS managed lands along the Lower CDA River in exchange for natural resource lands at other locations in Idaho.

**The Anderson Lake Boat Launch is immediately upstream of the Idaho Highway 97 Bridge across the Coeur d'Alene River. The Idaho Transportation Department (ITD) has started construction of the bridge and approaches. The new bridge will be considerably wider and bridge access will be adjusted accordingly which may in turn impact the Anderson Lake Boat Launch access point. Accordingly, EPA is deferring any decisions regarding additional remedial action work at the Anderson Lake Boat Launch so that any additional cleanup efforts can be coordinated with the bridge replacement. EPA will continue to stay abreast of ITD's plans to the extent that this activity may influence the Superfund remedy.

Stage 2 – Lower Basin Recreational Management Plan – During the 2006-2010 planning period, the PFT will complete development of a Lower Basin Recreational Management Plan involving

agencies, local communities, impacted land owners and other stakeholders. Many agencies and entities, including BLM, Idaho Fish and Game (IDFG), the CDA Tribe, Idaho Department of Parks and Recreation (IDPR), FS, and counties, manage recreational sites in the Lower Basin. These entities will benefit from the establishment of a coordinated plan to administer recreational areas. This effort could include development of collaborative informational/educational strategies regarding the Basin and CDA Lake. The plan could also address development of cooperative maintenance agreements.

Results of both the AVISTA and Idaho Department of Parks and Recreation Lower Basin recreational use surveys are available. The PFT will review the results of these two surveys, review use patterns of the Trail of the Coeur d'Alenes, and make an assessment of additional recreational sites that may be candidates for action.

1.3.4 Mine & Mill Sites

The OU-3 ROD identified a number of mine and mill sites with potential for human health exposures, primarily from recreational use. Prioritization of mine and mill sites in the Upper Basin is primarily based on risks of lead exposure to recreational users. Remedial designs will address these risks as well as any impacts to water quality. The mine and mill sites listed in the ROD that appeared to represent a potential risk to human receptors are as follows:

- Day Rock in Nine Mile Creek
- Upper and Lower Constitution, Highland Surprise, Nabob, Nevada Stewart, Hilarity, in Pine Creek
- Standard Mammoth, Sisters and Burke Concentrator in Canyon Creek
- Hercules, USBM, and Silver Dollar in South Fork
- Golconda, Morning No. 6, and National in the Upper South Fork
- Rex mill site in the east fork of Nine Mile Creek (added subsequent to the ROD)

The Constitution tailings piles, the Rex mine and mill site, the Golconda site, and the Sisters waste rock dump were identified in 2003 as initial priorities. These four sites were incorporated into the BEIPC five-year work plan. Construction at the Sisters site was completed in 2005.

Work at the Constitution site includes consolidation of the mine tailings from the upper and lower mine sites into a single repository at the Upper Constitution Mine. Construction will begin spring 2006 focusing on consolidation and capping of the mine and mill tailings. Overall site remediation will also include remediation of the waste rock areas, the mine adits, and stream rehabilitation and bank restoration work. The Constitution site work will be completed by either fall 2006 or summer 2007.

Phase 1 work at the Golconda site consists of an interim action to address surface water and adit flows to dry out areas of the site. This work is scheduled to begin spring 2006. The Phase 2 work will begin in the summer 2006 and include stabilization of the base of the waste rock pile, removal of tailings in the mill area and placement in an upland capped repository, capping of the tailings pond, and installation of erosion protection in the stream bank. This work is scheduled to be completed by the end of 2006.

The remediation work at the Rex site is scheduled to begin in the Summer of 2006. This work will include installation of a buttress on the tailings dam, removal of debris on site, installation of a surface/groundwater collection trench, overall site grading and capping to consolidate tailings, cap contaminated soils, and promote surface runoff. This work will be completed by the fall 2006 or early 2007.

Also in 2006 the Mine and Mill Site PFT agreed to move forward with work on the USBM property. For 2006 this will include review of existing information, identification of data gaps, collection of pre-design data and development of a preliminary design. This site was identified as a priority due to active recreational use and its proximity to the South Fork Coeur d'Alene River.

Looking ahead to the later years of the five-year plan, the Mine & Mill Site PFT will continue to evaluate the other sites identified in the OU3 ROD that have a potential for human health exposure from recreational use. Using the factors listed above, the PFT will prioritize sites for initiation of remedial designs including the collection of pre-design field data. Initiation of designs and remedial actions will be contingent on available funding. Further prioritization of mine and mill sites and removal sites will begin in 2006 with the development of draft prioritization matrix. This matrix will be further refined to list sites, identify existing data and any data gaps, identify responsible entities and property owners etc. This tool will be used to help prioritize sites for further investigation and cleanup work as funds become available.

1.3.5 Blood Lead Screening in Children

The State of Idaho has historically been the lead on child blood lead screening in the Box and the Basin. The State has contracted with the Panhandle Health District (PHD) to implement the screening. In the past, the Idaho Department of Health and Welfare, Division of Health (IDOH), through funding from the federal Agency for Toxic Substances and Disease Registry (ATSDR), contracted with the PHD. In recent years, the Idaho Department of Environmental Quality (IDEQ) has contracted and funded, through state funds, the work with the requirement that the PHD provide the work plan and report results to the IDOH. IDEQ took on this role after ATSDR stopped funding the screening.

The NAS recommended that "blood lead screening of all children aged 1-4 years living in the basin be initiated in conjunction with local health care providers. Results should be used to evaluate the efficacy of the environmental interventions."

In line with this recommendation, and as part of its ongoing review of human health related issues, the Human Health PFT will explore alternative approaches to integrating universally available blood lead testing into the regular health care services received by Basin children aged 1-4 years with a part of the work being to identify an education outreach program. Such exploration will include examining alternative methods for implementing an integrated blood lead testing approach as reflected in those present in other states elsewhere in the nation. This effort will begin in 2006 with a goal to craft a two-year pilot program for the delivery of blood lead testing via this new approach. This goal may be modified as the Human Health PFT works

on this issue. In addition, the BEIPC will request that community and elected officials encourage participation in a universally available screening for children. No effort to mandate blood lead screening of children will be undertaken.

In the meantime, EPA, IDEQ, IDOH, and PHD will continue to offer a universally available blood lead screening program in 2006. That program offers universal screening to children 0 to 6 years in age in the sense that screening is offered to all children for free and in the case of the Basin the program offers a \$20 incentive. Idaho Department of Health and Welfare, Division of Medicaid will work with participating physicians in the Basin to comply with requirements to perform blood lead screening during “well child checkups”. In addition, the TLG will also develop an approach to encourage and facilitate the provision of blood lead testing to children covered under Idaho’s Medicaid program. This issue will be discussed as part of the exploration of alternative approaches to integrating universally available blood lead testing into existing pediatric health services.

The TLG also will review the Basin (Operable Unit 3) blood lead exposure report identified in the EPA’s October 2005 Five Year Review. This report will provide information to help scientifically evaluate the efficacy of remedial actions undertaken in the Basin.

1.4 ENVIRONMENTAL RESTORATION ISSUES

Environmental restoration issues under consideration by the BEIPC include involvement in the implementation of the 2001 OU2 ROD Amendment as well as environmental restoration work in the Upper and Lower Basin described in the ROD for OU3.

1.4.1 Upper Basin Remedies

This work includes remediation identified for Ninemile Creek, Pine Creek, Canyon Creek and the South Fork. Remediation in these areas is tied to benchmarks established in the ROD that are directed toward improvements in water quality and in the fishery.

Priorities proposed in this plan for improvement in water quality and fisheries habitat are water treatment in Canyon Creek, and remediation of mine wastes along Pine Creek. Treatment in Canyon Creek was selected as the priority action because it is expected to provide the greatest reduction of dissolved zinc and cadmium in the South Fork of the Coeur d’Alene River upstream of the Box. Remedial actions in Pine Creek were selected as the priority because this drainage provides the best opportunity for meeting fisheries benchmarks specified by the ROD in the near term.

Water Treatment - Treatment of water in Canyon Creek is proposed as the remedial action priority for reduction of dissolved metals in the South Fork above the Box. To reduce zinc loads to the South Fork Coeur d’Alene River, the OU3 ROD calls for treatment of Canyon Creek surface water near the mouth of the creek. A great deal of the metals loading in the surface water comes from contaminated ground water in the watershed. Water treatment technology assessments and pilot tests have been underway for surface and ground water focusing on developing the most cost-effective long-term solution to improving water quality from Canyon

Creek that will meet the goals of the OU3 ROD.

Based upon preliminary studies and current information the approach to treatment of Canyon Creek water continues to evolve. It is possible that several technologies, either active or passive, could be used in series or parallel to treat either Canyon Creek surface or groundwater. The treatability studies, monitoring, and technology evaluations are essential to the selection, design, and construction of any eventual water treatment system for Canyon Creek.

The treatability study work (Phase I and Phase II) has been completed and it identified several treatment approaches which can effectively treat groundwater with high concentration of contaminants. The information from this study will be used to further identify and screen remedial components (i.e., such as collection, conveyance, storage, and treatment options). Community input will be sought during this screening process which will be followed by development of design criteria for a preferred treatment approach. The initial identification and screening of remedial components is expected to be completed by the fall of 2006. Also during 2006 a Hydrologic Investigation will be conducted in Canyon Creek to develop a more complete understanding of the relationship between surface water and groundwater in Canyon Creek. The study will provide additional information on the alluvial stratigraphy of the Canyon Creek drainage as well as groundwater levels and dissolved metal concentrations. This information in conjunction with a groundwater model will be used to determine if treatment of groundwater alone would achieve the goals of the ROD. This information will help guide the identification and screening of remedial approaches. Ultimately construction of any remedy for Canyon Creek will be contingent on funding and a State Superfund Contract.

Fishery Habitat Improvements - Pine Creek is a priority area for improvement of fish habitat. Implementation of the remedy selected in the ROD is expected to significantly improve 3.5 miles of habitat. These improvements are expected to allow natural increases in salmonid populations and enhance spawning and rearing. EPA and BLM are the lead agencies for remedial actions in Pine Creek. BLM has already done a significant amount of stream and mine site stabilization on public and private lands in Pine Creek. BLM is developing a master stream stabilization plan. Cleanup in Denver Creek and the Upper and Lower Constitution tailings piles are a first priority. The potential exists for BLM to contribute funds to projects in the Pine Creek watershed if performed as joint-funded efforts along with BEIPC directed projects.

In addition to technology evaluation for water treatment in Canyon Creek and remedial designs for mine and mill sites, many remedial actions identified in the ROD will require additional information and analysis to support design and remediation. Development of necessary information and understanding in the near term will allow efficient implementation of remedial actions in future years.

1.4.2 Lower Basin Remedies

The ecological work described in the ROD for the Lower Basin includes actions for the wetlands and lateral lakes, the river banks, splay areas and river bed. The objectives of remediation in the Lower Basin focus on improving wildlife habitat and reducing particulate lead in the Coeur d'Alene River.

The U.S. Fish and Wildlife Service (USFWS) completed data collection on riparian soils through an interagency funding agreement with EPA. During 2006, the EPA, USFWS and EPA's contractor will be developing a risk-based soil cleanup level that is protective of riparian ground-feeding songbirds.

Many other issues and uncertainties pertaining to the implementation of remedial actions in the Lower Basin have been raised. Some lack of data continues to exist pertaining to the complex ecology of the Lower Basin and the combined effects of mining related contamination. Clean Water Act sub-grants were approved by the BEIPC to provide site-specific information required to make sound ecological remedial management decisions. In 2006 and 2007, a major focus will be to complete these studies and demonstration projects and monitor the effectiveness of already completed CWA sub grant projects.

However, despite the large extent of mining-related contamination, resulting negative ecological effects previously documented, and work described in the ROD, no additional remedial action Superfund money is currently designated for Lower Basin ecological remedies. EPA Region 10 is receiving funding for human health remedies in OU3 but not for Lower Basin ecological remedies. In order to fully implement the interim ROD, funding from the EPA Superfund program and other sources will be needed. The BEIPC will support EPA Region 10 in an effort to secure Superfund funding from EPA Headquarters and will have the Funding PFT working on outside source funding for ecological remedies.

1.5 BASIN ENVIRONMENTAL MONITORING

Basin Environmental Monitoring Plan (BEMP) - Implementation of the long-term status and trends basin environmental monitoring program (BEMP) will continue. Establishment of a basin-wide environmental monitoring plan is required under the OU3 ROD. The monitoring program is critical to the successful implementation and evaluation of the Selected Remedy. EPA worked with the Monitoring PFT to develop the Basin-wide environmental monitoring program. The Monitoring PFT, TLG and key stakeholder agencies concurred that the BEMP is appropriate given available funding to obtain technical data for assessment of long-term status and trends, evaluation of overall effectiveness of the Selected Remedy, evaluation of progress toward cleanup benchmarks, and future Five-Year reviews. EPA will continue to make analytical results from site surface water, soil and sediment sampling available on the web-accessible data management system (www.storet.org); human health-related data will not be included in this database. EPA will assist interested stake holders in accessing the information.

Remedial Action Effectiveness Monitoring - Action-specific effectiveness monitoring will focus on areas that have been addressed by remedial actions (e.g., tributaries, river reaches, etc.). The purpose of the effectiveness monitoring is to assess the success and effect of a given remedial action. By comparison, the BEMP will address basin-wide status and trends by monitoring a limited number of strategic locations. Both the remedial action-effectiveness and long-term monitoring plans will be integrated by coordinating monitoring to generate comparable data (same timeframe or synoptic) and using common sampling locations, where possible. Effectiveness monitoring, while not detailed in the BEMP, will incorporate similar monitoring

hypotheses as those included in the BEMP. The adaptive management approach will maximize the utility of effectiveness monitoring data through comparison of results to expectations.

Remedial action effectiveness monitoring in OU3 will be included in the designs and implementation plans for ecological-related remedial actions.

PART 2 – ACTIVITIES AND WORK FUNDED THROUGH THE CLEAN WATER ACT GRANT PROGRAM

CWA funds are being used *“to conduct and promote the coordination and acceleration of research, investigations, experiments, training, demonstrations, surveys, and studies relating to the causes, effects, extent, prevention, reduction and elimination of pollution”* Clean Water Act 104(b)(3). Within these constraints, the BEIPC approved a number of projects to be funded under the CWA. A portion of these projects are designed to support CDA Lake management activities.

The first round of CWA funds were available in Fiscal Year (FY) 2002 and obtained by the BEIPC in the summer of 2003. These projects are nearing completion. The next round of funding for FY2003 was available to the BEIPC during the summer of 2004. These projects are at various stages of implementation and some are nearing completion. Finally, the most recent round of funding for FY2004 was available in July 2005 and these projects are at various stages of implementation. It is anticipated that most if not all the CWA projects will be completed by the end of 2008.

This section of the work plan outlines activities of all CWA projects. As these projects reach completion, the BEIPC will receive reports detailing the results of each one. Over the next five years, information taken from these reports will be used to develop future work plans.

Table 2-1 is a summary of activities funded with CWA funds.

Table 2-1 Summary of Activities Funded by CWA

Activity	Scope	Lead Agency
Lake Monitoring Water Quality Studies	Conduct monitoring of lake water quality to assess nutrient, sediment, and metal loading and trends in lake water quality; to assess improvements/impacts from upstream environmental improvements projects; and assess impacts from further development projects along the lakeshore.	CDA Tribe, USGS

Activity	Scope	Lead Agency
Ecological Monitoring of Coeur d'Alene Lake	Identify baseline conditions for ecological receptors in CDA Lake in order to determine future changes in the ecological condition of the lake. This information may be used in the future to determine if actions implemented under the OU-3 ROD and management actions implemented under the Lake Management Plan are effective.	USFWS
Stream Bank Stabilization	Construct and monitor the effectiveness of several techniques to protect the Coeur d'Alene River banks from boat wake erosive forces.	IDEQ
Lake Education and Outreach Program	Develop and implement a public information and education plan. The objective of such a plan is to provide the public with information to help them better understand the ecology of the Lake and ways they can better protect the Lake while they enjoy it.	CDA Tribe, KSSWCD
Mullan Inflow and Infiltration Groundwater Metal Loading Study/Demonstration Project	Evaluate sources of metals loadings to wastewater treatment facilities, investigate the potential reduction of metals loadings to the South Fork Coeur d'Alene River, determined the efficacy of wastewater collection system infiltration and inflow (I/I) reduction projects to reduce peak plant flows, and advance the current state of knowledge with regard to the cause and effect of such efforts to reduce pollution while considering transaction costs and community coordination.	South Fork Sewer District
Woodland Park Groundwater Quality Monitoring	Monitor water quality in this shallow alluvial groundwater system in Woodland Park area of Canyon Creek. Gain a better understanding of the metal concentrations and potential loading from groundwater to the Canyon Creek surface water system.	IDEQ
Meyer Creek Flood Control	Assess the condition of the Meyer Creek diversion system and propose possible alternative remedial recommendations and order of magnitude cost estimates to prevent recontamination of the Superfund remedy in the City of Osburn during a flood event.	IDEQ

Activity	Scope	Lead Agency
Upper East Fork Nine Mile Creek Water Quality Evaluation	Success Mine Passive Water Treatment – 1) Reduce plugging in the Success Mine Apatite Barrier by making design modifications to the sediment chamber and injecting air into the Apatite to break up clogging in the media; 2) Perform a tracer study to determine hydraulic flow paths and residence times; 3) Analyze Apatite to determine forms of metal precipitates and where the reactions occur; and 4) Evaluate nutrient addition in the groundwater to determine if in situ metal precipitation is a viable option. East Fork Ninemile Creek Monitoring – Conduct monitoring of the East Fork of Ninemile Creek to assess where metal loadings occur, how seasonal flows affect metal loadings, evaluate overall water chemistry, and determine forms of metal precipitates.	INL
Metals and Nutrient Removal Pilot at Page Plant	Evaluate two emerging technologies for precipitation and/or adsorption for removal of heavy metals (lead, cadmium, zinc, and copper) and phosphorus from point source discharges in the Silver Valley, especially the Page wastewater treatment plant.	South Fork Sewer District
East Fork Pine Creek Revegetation Pilot Project	Identify practical and cost-effective methods to accelerate natural revegetation processes. Vegetation is needed to ultimately stabilize many stream reaches within the Basin. Identify and contrast the relative “bang for the buck” of several locally applicable revegetation methods.	BLM
Inventory and Evaluation of Private Lands for Potential Restoration of Wetland Habitats	Provide a comprehensive inventory that identifies private land that may be suitable for wetland remediation and restoration projects in the Basin. This inventory would be useful for identifying agricultural and wetland habitats that could be remediated or restored as part of the ROD. Landowners will be surveyed to determine interest in wetland creation or enhancement on their respective properties. Properties identified as potential remediation/restoration projects will be assessed for their habitat quality.	USFWS

Activity	Scope	Lead Agency
Monitoring Fish Responses to Bank Stabilization in the Coeur d'Alene River	Assess the short- and long-term affects of bank stabilization treatments on fish community structure in the lower Coeur d'Alene River. Provide recommendations for bank stabilization project designs with the least adverse impacts and most positive benefits to overall fish community structure. Provide recommendations on what project-specific monitoring that would be required for individual bank stabilization projects.	USFWS, U of I
Sediment Transport Model	Develop a set of tools that can be used by resource managers for evaluating proposed projects designed to minimize the transport of metal contaminated sediments in the Lower CDA River. Objectives include the utilization of existing data and collection of additional data to develop and calibrate computer models of the river between Cataldo and CDA Lake. These models would be capable of simulating the hydraulic and sediment transport characteristics of the river over a wide range of stream flow and lake elevation conditions. The models would be used to test proposed projects prior to implementation with the goal of improving their design and avoiding unanticipated and costly mistakes.	USGS
Lake Response Simulation Model	Provide the entities responsible for management of Coeur d'Alene Lake with a sophisticated computer modeling system with which to simulate the lake's long-term responses to a wide range of remediation strategies to be implemented under the ROD and the Lake Management Plan.	USGS

Activity	Scope	Lead Agency
North Fork Coeur d'Alene River Hydrologic and Sediment Study	Characterize and determine the existing hydrologic and in-stream conditions within the North Fork Coeur d'Alene River sub-basin stream system, and attempt to determine the impact of past and current management actions on the observed stream function and ecological conditions. In turn, the above scientific assessment would lead to specific identification of restoration projects, BMPs, and land use policy changes aimed to restore proper hydrologic functions and the impaired cold water aquatic life beneficial use (i.e., salmonid populations).	IDEQ
Mica Bay Nutrient Reduction Project	Demonstrate for training and education purposes a means of reducing nutrient and sediment contamination to Coeur d'Alene Lake in accordance with the implementation of the Lake Management Plan. Project will also accomplish some TMDL implementation goals for the recovery of beneficial uses in Mica Creek.	IDEQ
Lower Lakes Aquatic Vegetation Survey	Develop baseline data on submersed aquatic plant species distribution and biomass in Benewah, Chatcolet and Round Lakes. Estimate nutrient (primarily phosphorus) release from the existing plant beds into the water column of these lakes and, subsequently into Coeur d'Alene Lake. Inspect these lakes for the presence of invasive, noxious aquatic species.	CDA Tribe
Canyon Creek Groundwater Metal Source Characterization	Determine how, in practical terms, zinc and other metals are distributed between different physical and chemical states in the Canyon Creek alluvium. This information will be used to help understand how natural processes can affect the movement of contaminant metals through Canyon Creek and how engineered processes can impact contaminant metal mobility or sequestration.	INL
Plummer Wastewater Treatment Plant Pilot	Construct a pilot scale demonstration of a cascading wetland treatment for use in the City of Plummer waste water treatment plant upgrade.	City of Plummer

Activity	Scope	Lead Agency
Plummer Creek Watershed Nutrient Load Assessment, Modeling, and Management Plan Development	Characterize nutrient concentrations and transport through the Plummer Creek watershed and into Chatcolet Lake. Develop a Watershed Nutrient Management Plan which will include appropriate and specific point nutrient source control efforts for the Plummer Creek watershed.	CDA Tribe
Pinehurst Flood Impact Study	Develop stream channel and drainage infrastructure techniques to control and mitigate water pollution and protect property from recontamination and flood impacts.	IDEQ
Silver Crescent Mine and Mill Complex Habitat Restoration	Study the feasibility and economics of watershed restoration in areas where the original stream type has been severely altered by mining and environmental cleanup activities.	USDA-Forest Service
Canyon Creek Treatability Study	Develop an alkaline precipitation design as a low cost method of achieving a substantial improvement toward ROD goals, and determine if the proposed water treatment technology is implementable in the So. Fork CDA River.	IDEQ
South Fork Sewer District Toxicity Reduction	Identify sources of toxicity in Basin community wastewater treatment plant effluent to develop options for removal of toxicants; perform bench testing to verify removals; and develop capital and O&M cost projections.	South Fork Sewer District
Assessment of the Economics and Effectiveness of Alluvium Sorting as Mine Waste Removal Strategy at the Project Implementation Level	Establish, at a removal project level, the costs of a simple screening of removed contaminated alluvium, and assess the beneficial value of the removal strategy by assessing the change in the metals content of the three-quarter inch minus fraction of the bed load sediment downstream.	IDEQ

Activity	Scope	Lead Agency
Coeur d'Alene Lake Management Plan Implementation	Conduct an extensive evaluation of all activities within one mile of the Lake shore to evaluate what BMPs are in place, how effective they are, what BMPs are required but not in place, and to establish specific BMP audit procedures.	IDEQ, CDA Tribe

PART 3 – OTHER BEIPC ACTIVITIES AND RESPONSIBILITIES

For Part 3, the scope of the proposed five-year work plan includes a number of work items that the BEIPC has agreed to become involved in and items of work needed to accommodate some of the recommendations of the NAS study. The proposal includes the following work:

- Implementation of the Phase II Component of Overall OU2 Remedy
- Coordination with the EPA Five-Year Review
- Consideration and implementation of selected National Academy of Sciences

Recommendations

- Lake Management Plan Activities
- Partial deletion of areas within the Superfund Site
- Funding Source Evaluation
- Comprehensive Infrastructure Needs Identification and Planning Activities

3.1 PHASE II COMPONENT OF OVERALL OU2 REMEDY

As part of the State Superfund Contract (SSC) for OU2, a Comprehensive Cleanup Plan (CCP) was developed to define a path forward for remedy implementation in OU2. The CCP calls for a phased approach to implementing the OU2 remedy. In Phase I, the focus is on remedial actions aimed at removing and consolidating extensive contamination from various site areas, demolition of structures, development and implementation of an ICP for OU1 and OU2, future land use development, and public health response actions. Phase I work also includes support studies for long-term water quality improvement and evaluation of Phase I remedial action effectiveness.

Phase II of the OU2 remedy will be implemented following completion of source control, removal activities and evaluation of the effectiveness of these activities in meeting water quality improvement objectives. Phase II will consider any shortcomings encountered in implementing Phase I and will specifically address long-term water quality, ecological and environmental management issues. Both ROD and SSC amendments will be required prior to implementation of any Phase II remedial actions. EPA and IDEQ are the responsible parties for modifying the ROD and negotiating a State Superfund Contract.

The BEIPC has decided to participate in future Phase II activities in OU2 by providing technical input into the remedy alternative development and selection (including evaluation of technical reports, pilot studies, and feasibility study documents), providing input into the public processes

associated with ROD modifications and educating the community and legislative bodies of the need for funding for this work.

The following provides a brief overview of EPA and IDEQ's concept for how the agencies will jointly move forward in conjunction with the BEIPC to set the stage for evaluation and potential implementation of an OU2 Phase II remedy.

Phase I Evaluation

The OU2 Phase I evaluation is currently underway by EPA and IDEQ. The following documents have been developed to provide a road map to refine understanding of the OU2 environmental system and facilitate Phase II remedy implementation.

Revised OU2 Conceptual Site Model (CSM)

The CSM presents the current understanding and status of contamination within the OU2 environmental system. Within this document, data gaps and uncertainties associated with the environmental system will be presented. This is a living document and will be updated as required to refine the understanding of the OU2 environmental system and to provide a basis for future actions.

Statistical Trend Analysis of Groundwater and Surface Water

A statistical analysis of water quality monitoring data generated as a result of OU2 water quality monitoring was performed to analyze contaminant data for trends on a location specific and, to the extent possible, on an OU2-wide spatial basis. Included in this analysis is an evaluation of correlations between contaminants and parameters measured within OU2.

Phase I Remedial Action Characterization

This characterization of Phase I remedial actions includes identification of the extent of these cleanup activities and their impact on contaminant nature and extent and potential release mechanisms associated with these sources. This document refines the understanding of remedial actions performed as part of Phase I cleanup activities within OU2.

Revised OU2 Environmental Monitoring Plan

This revised status and trends monitoring plan for groundwater, surface water, and ecological receptors within OU2 provides data to evaluate the performance of the overall OU2. Remedial action effectiveness monitoring plans were developed for the larger Phase I remedial actions. The revised OU2 monitoring plan will coordinate with the OU3 Basin Environmental Monitoring Program.

The above documents and their findings are available for consideration and were presented to the TLG and BEIPC in February 2006 for explanation and discussion. The documents were provided to OU2 Phase II Water Quality PFT members and are available in the eight site information repositories.

EPA and IDEQ are also preparing a **Phase I Remedial Action Specific Assessment**. This document will assess impacts, to the extent possible, of remedial actions performed as part of Phase I activities on water quality and ecological receptors within OU2. The assessment will include all remedial actions completed under OU2 Phase I and included in the Phase I Characterization report but will emphasize those areas or actions believed to have the most substantial impact on the water quality and ecological receptors. The assessment will consider the impacts of the Phase I remedial actions on contaminant nature and extent and potential contaminant release mechanisms. The Phase I remedial actions that were intended to have the most substantial impact are understood to include Smelter Closure Area, Smelerville Flats, Government Creek, CIA, and Bunker Creek. It is recognized that it may be difficult to quantify the effectiveness and impacts of each individual remedial action given the complexities of the site and relatively short period since the completion of the remedial actions.

OU2 Phase II Remedy Consideration

Following the above evaluation of Phase I remedial actions in OU2, the next step is to further set the stage for consideration of Phase II remedy alternatives and potential implementation. The following evaluations will facilitate definition of OU2 Phase II.

Identification of OU2 Source Areas of Concern

Based on the results of the Phase I evaluation, source areas within OU2 will be identified and ranked based upon a set of criteria to be established. The criteria will include a relative contaminant metal loading, impacts on environmental receptors and other factors to be determined. Data gaps that need to be filled to confirm and quantify source areas and their resultant impact on the environmental system may be identified and addressed.

Identification and Evaluation of Potential OU2 Phase II Remedial Actions

Based on the results of the identification and relative ranking of source areas identified within OU2, conceptual remedial actions (RAs) will be developed to address the sources and evaluated based on implementability, effectiveness and cost of supplemental remedial actions. Appropriate remedial actions will then be implemented.

3.2 CONSIDERATION OF EPA'S 5-YEAR REVIEW

EPA's latest 5-Year Review of the Bunker Hill Superfund Site was completed in October 2005. Another 5-year review is scheduled for 2010. BEIPC will consider the content of the latest review report and determine an appropriate course of action in its work planning process.

3.3 NATIONAL ACADEMY OF SCIENCES STUDY

The final report of the National Academy of Science (NAS) study of EPA's assessment and cleanup decisions in the Coeur d'Alene Basin was released in December 2005. The BEIPC is in the process of reviewing the report concerning Coeur d'Alene Basin recommendations and implementing some of the recommendations including an ICP and a comprehensive infrastructure needs identification and planning process for the upper Basin.

3.4 LAKE MANAGEMENT PLAN ACTIVITIES

Pursuant to a “Coer d’Alene Lake Management Plan Development Agreement Between The Coeur d’Alene Tribe and the State of Idaho” dated August 5, 2005 and the subsequent “Request for Expressions of Interest, Qualifications and Cost Quotations” (REIQ), the CDA Tribe and IDEQ intend to complete revision in 2006 of the 1996 Lake Management Plan (LMP) that was accepted by the BEIPC for use in the CDA Basin. This work includes stakeholder involvement as contemplated by the REIQ which is consistent with the Memorandum of Agreement For Evaluation And Recommendations Regarding the Coeur d’Alene Lake Management Plan between the CDA Tribe and IDEQ dated January 22, 2002 and the Memorandum of Agreement For Evaluation And Recommendations Regarding the Coeur d’Alene Lake Management Plan between the IDEQ and Kootenai, Benewah and Shoshone Counties dated January 13, 2002. It is anticipated that the State and Tribe, coordinating their activities with the BEIPC, will develop projects and activities to implement the LMP over the next 5 to 10 years. Once the LMP is approved and implemented by the Tribe and State in coordination and consultation with appropriate stakeholders, the BEIPC will request that the EPA develop criteria for deletion of the CDA Lake portion of the Superfund Site.

3.5 PARTIAL DELETION OF AREAS WITHIN THE SUPERFUND SITE

In accordance with the National Contingency Plan, 40 CFR 300.425(e), the BEIPC will request that EPA develop criteria for deleting geographic portions of the listed Superfund Site where no further response is appropriate or other areas where all response work is completed.

3.6 FUNDING SOURCE EVALUATION

The BEIPC formed a Funding PFT in September 2005 to examine potential environmental cleanup and restoration funding sources and present an assessment of funding availability. This assessment will include a discussion on constraints for the use of various funding sources. This work should be completed by December 2006.

3.7 COMPREHENSIVE INFRASTRUCTURE NEEDS IDENTIFICATION AND PLANNING ACTIVITIES

The BEIPC will develop a comprehensive infrastructure needs identification and planning process for the Basin including development of potential financing options and acquisition of financing. This process will address infrastructure needs to protect environmental cleanup remedies, preserve public and private property, and revitalize local economies within the Basin. This project would be modeled on a similar project implemented in the Box.

This work will address the concerns of many residents and government officials in the Basin and the NAS involving potential damage to the cleanup remedies posed by flooding and the need to construct and reconstruct infrastructure to preserve property and protect the environment.

The BEIPC will work closely with county and local government agencies to develop and implement the infrastructure process.