

BEIPC Coeur d'Alene Basin Calendar Year 2010 Final Work Plan

INTRODUCTION

This plan covers environmental cleanup and improvement activities in the Coeur d'Alene Basin scheduled for CY 2010 by the Basin Environmental Improvement Project Commission (BEIPC) and responsible coordinating agencies in accordance with their responsibilities as stated in the Memorandum of Agreement (dated August 2002). Actions noted in the plan are intended to implement the goals and objectives of the BEIPC's 2010-2014 5-Year Work Plan. 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 recommendations for activities and work to be performed in CY 2010. This work plan for 2010 is organized as follows:

Part 1 – Remedial Work Funded with Superfund or Other Cleanup Monies

Part 2 - Other BEIPC Activities and Responsibilities

Part 1 includes work to implement the Operable Unit (OU) 3 Record of Decision (ROD) and any amendments 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.

Part 2 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.

The five-year plan outlines activities and work proposed to be implemented over the next five years; however, it does not sequence these activities. This one-year plan establishes and maintains the sequencing of activities that will be needed to complete the activities and work approved in the five-year plan, but it may not address all work items noted in the five-year plan because some will not be initiated until later years in the five-year plan.

PART 1 – REMEDIAL WORK FUNDED WITH SUPERFUND OR OTHER CLEANUP FUNDING

Funds made available through EPA's CERCLA program are available for environmental remediation on privately owned lands and state, county and local government owned properties. EPA's appropriated 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 is supplying funding through the Idaho Department of Environmental Quality (IDEQ) for environmental cleanup activities.

For Part 1, the scope of the proposed work corresponds to the level of funding and the funding sources anticipated from EPA and State funding for CY 2010 for implementation

of the ROD and any amendments. The proposal includes the following OU-3 ROD work to be funded with Superfund or other cleanup monies:

- Repository Development and Management
- Residential and Community Property Remediation
- Blood Lead Screening in Children
- Recreational Use Activities
- Upper Basin Ecological Remedies
- Lower Basin Ecological Remedies
- Basin Environmental Monitoring

1.1 REPOSITORY DEVELOPMENT AND MANAGEMENT

Background

Repository development is an ongoing process that must address the demand for mining-related contaminated waste disposal for the entire Basin environmental clean up program and the Institutional Controls Program (ICP). Without new repositories, continued cleanup and control of contamination is compromised and potentially stopped. IDEQ is the lead in developing repositories and the effort is coordinated with the BEIPC and EPA and funded by the EPA.

There are two operational repositories within the OU-3 area, the Big Creek Repository (BCR) and the East Mission Flats Repository (EMF). The BCR has been receiving Basin Property Remediation Program (BPRP) waste soil since 2002. As of December 2009, the BCR has received approximately 400,000 cubic yards (cy) of soil, over 80% of the 500,000 cy design capacity. The BCR is located at the mouth of Big Creek and currently serves the Upper Basin.

Construction at EMF commenced in August 2009. The construction consisted of two principal elements: (1) building a bridge and appurtenant features to allow site access from I-90 Exit 39 to the west side of EMF; and (2) building portions of the decontamination pad infrastructure at the east bridge landing. The bridge and decontamination facilities will be utilized for the life of the repository.

Concurrent with construction activity, contaminated soils were disposed of at EMF through the 2009 construction season. At the end of the 2009 season, EMF had received approximately 26,500 cubic yards of contaminated soil. The waste material was stabilized to resist erosion during potential flood events prior to winter closure.

The repositories experienced a significant increase in waste volume delivery in 2009 as a result of the \$15M American Recovery and Reinvestment Act (ARRA) funding. The ARRA monies were allocated specifically for the BPRP, and augmented the existing budget annually programmed through the EPA/IDEQ Remedial Action Cooperative Agreement (RACA) for property cleanups. The combination of the ARRA and RACA funding resulted in nearly doubling the amount of soil waste deposited at the repositories in 2009. The ARRA funding will continue for 2010 and 2011, the affect of which will

significantly increase the volume of waste arriving at repositories. Given that BCR will be completely full in the 2010 construction season, there is an urgent need to pursue location and design of another Upper Basin repository to succeed BCR.

Objectives

The Repository Work Plan centers on three objectives: (1) operations at BCR and EMF; (2) the search for a new repository site in the Upper Basin; and (3) development/revision of repository program guidance documents including the Waste Management Strategy (WMS) and Waste Acceptance Criteria (WAC). Specific tasks to achieve these three objectives are summarized below.

Operations

With both EMF and BCR open to receive waste, the BPRP will include both Lower and Upper Basin property remediation in the 2010 field season. Assuming the 2010 construction season follows that of 2009, an estimated 100,000 to 120,000 cy of waste material will be generated by the BPRP. Anticipating that need, the repository operations include but are not limited to the following tasks: (1) receiving and placement of BPRP and ICP waste soil at a rate comparable to 2009; (2) segregation and appropriate disposal of non-soil waste associated with ROD-specific remediation activities, these non-soil waste materials include such items as wood and root wads, concrete and miscellaneous demolition debris; (3) equipment decontamination; and (4) groundwater monitoring; and (5) facility operations and management.

New Repository Search

In order to provide un-interrupted service in support of Upper Basin remedial action, it is vital to identify and design the next repository for use in the Upper Basin. The repository siting and design process will be conducted in accordance with the process identified in Section 12.5 of the OU-3 ROD. In 2009 the Upper Basin repository siting team, benefitted by citizen and Repository PFT input, identified eight candidate sites that met the minimum initial siting criteria: (1) the site has storage capacity greater than 500,000 cy; and (2) the site is currently not being used for another purpose (inactive). Going forward in 2010, the repository siting activities will include final prioritization of the eight sites and selection of one or more sites for further technical evaluation as potential future repositories. The final site selection process will be conducted with joint participation between EPA and IDEQ. Prioritized sites for acquisition and development will be channeled through the Repository PFT, the TLG and finally to the Basin Commission at a regularly scheduled Commission meeting. Public comment will be sought on both repository location and design. Design work will proceed on at least one site at the conclusion of the site selection process.

Program Guidance Documents

The Waste Management Strategy (WMS) is a key document that guides repository siting. It contains future waste volume and schedule predictions within geographic areas. A key document that guides repository operations are the repository-specific operations plans. A component of the operations plans is Waste Acceptance Criteria (WAC). The WMS establishes the timing and location of needed OU-3 repositories, and the WAC specifies

what materials are acceptable for disposal at the repositories. Once delivered to the repositories the waste materials are handled in accordance with the repository-specific Operations Plans.

The WMS will be updated to incorporate additional information regarding the status of OU-3 remedial activity and repository needs identified in the upcoming ROD Amendment. The revised WMS will be developed in coordination with the Repository PFT and the EPA.

One issue to address in the overall clean-up process is development of universal WAC that would be applicable for waste soils disposed in both OU-1 and 2 (Box) and OU-3 (Basin). In addition to dealing with soil waste and metals thresholds concentrations, the revised WAC will identify means to manage items such as demolition rubble, oversize asphalt and concrete pieces, scrap wood and timber, and petroleum contaminated soil.

The WAC development will cross jurisdictional boundaries between the Box and the Basin. In the Box, repository management is performed by a four-entity team: the Upstream Mining Group (UMG), Panhandle Health District (PHD), EPA and IDEQ. In the Basin, repository management is provided by EPA and IDEQ.

A key element in successful completion of the universal WAC will be productive communication between the EPA, IDEQ and PHD. Key personnel from PHD, IDEQ and the IDEQ contractors met in September 2009 and identified key concepts for the WAC. The plan for 2010 WAC development is as follows: (1) draft language will be developed by IDEQ, PHD and IDEQ contractors; (2) once a draft WAC is assembled, the plan will be submitted to the EPA and UMG for their review and comment; and (3) the final WAC will be incorporated into waste management operations for implementation by the Box and Basin repository management groups.

Waste Disposal Alternatives

The EPA and IDEQ are working with representatives of various Silver Valley stakeholder groups to develop alternatives for disposal of metals-contaminated soil originating within the Area of Contamination. The alternatives for evaluation will include methods beyond the current practice of disposal at repositories. The goal of this task is to have viable functional alternative in place for the 2010 construction season. This task is still in the development process and, while progress is being made in developing draft language, no documents are currently available for reference or review.

1.2 HUMAN HEALTH ISSUES

Remediation of human health exposures is a remedial action priority as defined in the OU-3 ROD. It includes maintaining the ICP and conducting cleanup in residential, community and recreational areas. The ROD also identifies mine and mill sites that represent risks to human health.

1.2.1 Residential and Commercial Property Remediation

During 2010 IDEQ plans to remediate approximately 700 properties. The properties will be located in target areas throughout the Upper Basin and Lower Basin. During the spring and fall, properties located at lower elevations will be targeted. High risk properties will be the top priority for remediation and IDEQ expects about 25% of the properties will be classified as high risk. High risk properties are those properties on which children less than 7 years of age or pregnant women reside.

The 2009 and 2010 remediation programs include a nearly 50% increase in the number of properties than has been previously remediated annually. The increase work effort can be attributed to the availability of Stimulus funding that was provided through the American Recovery and Reinvestment Act. Stimulus funding became available to the residential areas remediation program in July 2009 and will continue to be utilized into the 2011 program with 75% of the funding required to be spent within the first two years. A total of \$15 million dollars was received for the residential areas remediation program from Stimulus funding.

The health and safety of the public, staff, contractors, and consultants is an important component of the remediation program. That component will continue to be emphasized during the 2010 program.

In 2010 IDEQ plans to sample approximately 725 targeted property equivalents and have the targeted areas sampling program close to completion by the end of the year. This will allow for planning for the current and future year remediation efforts.

1.2.2 Blood Lead Screening in Children

Screening of children for elevated blood lead levels has been occurring annually in the CDA Basin since 1996 as a public health service. The purpose of the screening is to identify children with elevated blood lead levels and provide follow-up from a public health professional to identify ways to reduce lead exposures. The screening program also provides data to inform the Basin cleanup efforts. The cleanup action decisions are not based on annual blood lead testing results. Rather, the goal is to prevent lead exposures that could result in elevated blood lead levels.

The lead screening program will continue in 2010 in the same manner as it has in previous years. However, efforts will continue to be undertaken to explore ways to increase participation. The Assistant Administrator of EPA's Office of Solid Waste and Emergency Response recently asked EPA Region 10 and IDEQ to engage local residents and partner agencies such as the Panhandle Health District, the Idaho Department of Health and Welfare, and the Agency for Toxic Substances and Disease Registry (ATSDR) to specifically discuss ways to increase participation in blood lead testing in the Coeur d'Alene Basin. Such conversations will be held under the auspices of the Human Health Project Focus Team (PFT). The PFT meetings are open to the public. As part of those conversations, the PFT will meet with local organizations that have

experience managing blood lead testing programs and/or an interest in increasing participation in the annual blood lead testing program. The agencies also will solicit input on public outreach activities that could be conducted in addition to the Basin Commission process to increase participation in the Bunker Hill annual blood lead testing program (e.g., outreach to communities in the Bunker Hill Box).

In 2006 and 2007, the HH PFT worked to find ways to increase participation. The PFT identified increasing the incentive as the most promising way to improve participation rates (the incentive payment is provided in the Basin but has been discontinued in the Box). Based on this recommendation IDEQ increased the incentive for screening for 2009 to \$40 per child instead of \$20 to attract more families for testing. The number of children participating in the 2009 increased by more than two fold compared to 2008. This commitment to increase the incentive payment was made for 2009 only. The agencies will consider whether this type of incentive increase should be continued during renewed discussions on increasing participation.

1.2.3 Recreation Use Activities

The OU-3 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 will be evaluated for cleanup based on factors such as risk of exposure, location and use.

The remediation and development principles identified by the Recreational Area PFT (below) remain appropriate for the 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.

2010 Tasks

The TLG recently decided to move this work from the Recreation Areas PFT into the Lower Basin PFT. This transfer is to better connect the recreation areas work with the ecological remedy and work on sediment transport and recontamination in the Lower Basin.

Specific tasks for this coming year include:

1. Further update the comprehensive inventory of contaminated recreation use areas.
2. Review operational plans for each recreation agency to identify commonalities that could be incorporated into an area wide recreation management guideline or strategy.
3. Work with the Communications PFT to identify what else can be done to make recreation users aware of human health risks along the river corridor and to further educate people on how to minimize any risks.

1.3 ENVIRONMENTAL REMEDIATION ISSUES

Environmental remediation issues under consideration by the BEIPC include involvement in the OU-2 Phase 2 remedy implementation as well as environmental remediation work in the Upper and Lower Basin described in the ROD for OU-3.

1.3.1 Upper Basin Ecological Remedies

This work includes remediation identified for the Upper Basin which includes the South Fork Coeur d'Alene River and its tributaries above its confluence with the North Fork.

EPA, IDEQ and the Upper Basin PFT are currently evaluating OU-2 and Upper Basin OU-3 ecological cleanup activities to develop a comprehensive cleanup plan for the Upper Basin. Information that is being used in this evaluation includes but is not limited to:

- Bench and Pilot Scale Studies of water treatment technologies in Canyon Creek
- Groundwater modeling in Canyon Creek and OU-2.
- Remedial Component Screening of Alternatives for Canyon Creek
- OU-2 Remedial Effectiveness Evaluations and Alternative Evaluation including evaluation of Permeable Reactive Barrier technologies.
- Action specific and long-term monitoring collected in OU-2 and OU-3.

EPA is undertaking this effort to address National Academy of Sciences recommendations, to incorporate improved knowledge of the Upper Basin and OU-2, and to move forward on a systematic, cost-effective approach to cleanup activities. This effort will culminate in 2010 with EPA and IDEQ identifying and selecting additional remedial actions for the Upper Basin and OU-2 in the Upper Basin ROD Amendment and a State Superfund Contract (SSC) amendment.

EPA is updating the ecological cleanup plan because there is a greater understanding of environmental conditions in the Upper Basin and Box. The Agency now can better define and prioritize the cleanup work. So far, EPA has been managing the Upper Basin and Box under two different cleanup plans. However, EPA understands that the Upper Basin and Box have similar water quality problems that harm fish and other wildlife. EPA also knows that the solutions are similar for these two areas. Therefore, the updated plan will evaluate and prioritize cleanup actions across these two areas. This approach is

consistent with the National Academy of Sciences' recommendation for a more comprehensive and complete cleanup strategy.

Throughout 2009, EPA has been working with the Upper Basin PFT to develop the comprehensive ecological cleanup plan. The Upper Basin PFT was formed by combining the Mine/Mill Site PFT, Water Treatment PFT, and the OU-2 PFT and an open invitation was issued to the TLG and CCC members to join the new Upper Basin PFT. Numerous PFT "working meetings" have been held to gather input and share information about development of the cleanup plan and prioritization of actions. An Upper Basin Focused Feasibility Study (FFS) is under development and will be completed in 2010. The Upper Basin PFT is reviewing preliminary draft sections of the FFS and ROD Amendment.

The ROD amendment will provide a priority list of cleanup actions in the Upper Basin and Box that will be completed as funds become available. The priority setting process will be documented in an Implementation Plan that compliments the ROD Amendment. This process will help ensure that the most effective actions are taken first. The goals of the ROD Amendment include:

- Prioritizing Upper Basin/Box source areas for cleanup,
- Moving forward on the OU-2 Phase 2 cleanup,
- Addressing changes in water treatment,
- Including a focus on particulate lead, and
- Protection of remedies from tributary flooding and heavy precipitation events.

The prioritized cleanups under the ROD Amendment are expected to provide significant improvement to surface water quality and will reduce the contribution of contaminated groundwater to surface water. There will also be reduced particulate lead in the river and downstream areas. This in turn is expected to reduce the recontamination potential in the Lower Basin and other downstream areas. Humans and wildlife will also have a reduced risk from contaminated mine waste.

While not required under CERCLA or the Basin Commission Memorandum of Agreement, EPA has and will continue to share technical information to seek input from the TLG, CCC, and Basin Commission on the ROD Amendment and priority setting process. In 2010, a proposed plan will be provided for public comment. EPA's goal is to issue the Upper Basin ROD amendment in 2010.

Initiation of specific designs and construction of selected remedial actions will depend on a number of factors including availability of funds, execution of a SSC for options requiring long-term operation and maintenance such as water treatment, and implementation of actions by potentially responsible parties.

Additional information about the ROD Amendment and prioritization of cleanup actions including technical memos, meeting presentations, and community involvement documents are present at the following web site:

<http://yosemite.epa.gov/R10/CLEANUP.NSF/sites/bh+rod+amendment>

1.3.2 Lower Basin Ecological Remedies

In the 2004 work plan, it was noted that a better understanding of the complex and dynamic system in the Lower Basin and sound answers to these questions were necessary before a sequence of remedial actions could be recommended. The ecological work described in the ROD for the Lower Basin includes actions for wetlands and lateral lakes, 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.

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 2009, the remaining CWA projects and studies were completed and some CWA projects will continue to be monitored for effectiveness.

In April 2006, EPA used Coeur d'Alene Basin Superfund settlement monies to purchase a 396-acre conservation agreement with a willing private property owner. The agreement was established to help meet OU-3 ROD goals in establishing safe waterfowl feeding habitat in the Lower Basin as they pertain to metals of concern. Other parties participating in agreement negotiations included U.S. Fish and Wildlife Service (USFWS) and Ducks Unlimited. Remedial action construction in ~300 acres of the easement started in September 2006 and was completed in 2007 using Asarco Trust settlement funds. EPA anticipates completion of the remedial action in the remaining ~100 acres in 2010 using Asarco Trust funds. The Coeur d'Alene Basin Natural Resource Trustees, led by the USFWS in coordination with Ducks Unlimited, Inc. have begun wetland restoration. USFWS and Ducks Unlimited will do the restoration work, and USFWS will coordinate maintenance of the site over the long term under the Trustees' 2007 Coeur d'Alene Basin Final Interim Restoration Plan. The restoration work will use Asarco Trust monies and Natural Resource Damage Assessment (NRDA) settlement funds. Through the Superfund remedial action and NRDA restoration activities, contamination is being addressed and this area is being made into perpetually protected, high quality feeding habitat for both migratory and resident swans, ducks, and other wetland bird species.

In 2010, EPA will finalize the development of an Enhanced Conceptual Site Model (ECSM) for the Lower Basin. The ECSM will serve to refine the current understanding of the Lower Basin with respect to river flows and sediment transport. EPA's contractor has performed a review of existing literature/predictive tools on this topic. The ECSM is comprised of a series of technical memorandums that were developed in 2009 and display the refined understanding and ultimately the selection of a predictive tool for decision making. The draft technical memorandums were presented to the Lower Basin PFT in August and September 2009 and will be presented to the BEIPC in 2010. Critical data gaps will begin to be filled in 2010 to facilitate the development of a computational model in the future. Data collection will be a multi-year effort with the focus on filling

the most critical data needs first. The sequencing and evaluation of cleanup actions in the Lower Basin will receive greater focus as human health cleanup and water quality issues in the Upper Basin are addressed. Also in 2010, the Lower Basin PFT will continue to assist the TLG and provide project ideas in order to implement the ROD for OU-3 where Remedial Action Objectives (RAO's) are identified; the BEIPC will support EPA in an effort to secure funding from EPA Headquarters; and will have the Funding PFT working on outside sources of funding for Lower Basin remedies as appropriate.

1.4 BASIN ENVIRONMENTAL MONITORING

Bunker Hill Superfund Site/Coeur d'Alene (CDA) Basin currently has 3 primary monitoring plans which govern the long-term status & trends and remedial action effectiveness monitoring as required under the respective OU-2/OU-3 Record of Decision (RODs). Currently there are 3 CDA Basin environmental monitoring programs/plans: OU-3 BEMP (2004), OU-2 EMP (2006), and OU3 RA Effectiveness Monitoring Program (2007). EPA is working with the Monitoring PFT and other interested parties to integrate the existing plans into a consolidated CDA Basin environmental monitoring plan to (1) optimize the current monitoring under the various programs, and (2) enhance the overall program operation/effectiveness with respect to changes/adaptive management, laboratory coordination, field sampling, data management, and reporting efforts. This process will utilize existing quantitative and qualitative tools to evaluate & optimize the current program; in addition, the approach includes the opportunity for input and coordination with stakeholders on the approach, data, locations, and evaluation process. This overall effort is also consistent with the efforts underway to develop a Comprehensive Ecological Cleanup Plan as discussed in Section 1.3. As in the current BEMP the monitoring will include sediments, surface water, groundwater, and biological monitoring at key locations in the basin.

The major goal of the current and revised BEMP is to monitor and evaluate the progress of the remedy in terms of improving ecosystem conditions. Consistent with that goal, the BEMP will provide data relative to the following Basin-wide monitoring objectives:

- Assess long-term status and trends of surface water, soil, sediment, and biological resource conditions in the Basin
- Evaluate the effectiveness of the Selected Remedy
- Evaluate progress toward cleanup benchmarks
- Provide data for CERCLA-required five-year reviews of the progress on remedy implementation
- Improve understanding of Basin processes and variability to in turn improve the effectiveness and efficiency of subsequent remedial action implementation

In the interim and until the Comprehensive BEMP is finalized, implementation of the long-term status and trends under the existing OU-3 BEMP will be continued in 2010 with EPA funding. In addition sampling under the existing OU-2 EMP and OU-3 RA

Effectiveness monitoring will continue under the existing plans until this work is incorporated into the revised Comprehensive BEMP.

EPA will continue to make analytical results from site surface water, soil and sediment sampling available on a web-accessible data management system; human health-related data will not be included in this database. For the last several years, EPA has made site environmental monitoring data available through a web page. Nationally the STORET system is transitioning to the new WQX data management system and the site environmental monitoring data will be accessible at a new website:

www.bunkerhilldata.org. The biological monitoring data and annual monitoring reports are also accessible at EPA's web page under Technical Documents at <http://yosemite.epa.gov/R10/CLEANUP.NSF/sites/cda>. If needed, EPA will assist interested stake holders in accessing the information.

PART 2 – OTHER BEIPC ACTIVITIES AND RESPONSIBILITIES

For Part 2, the 2010 work plan includes a number of work items that the BEIPC has elected to become involved in and items of work needed to accommodate some of the recommendations of the NAS study. The plan includes the following work:

- Lake Management Activities
- Funding for the Environmental Cleanup, Remedy Protection, and Infrastructure Revitalization
- Communications and Public Involvement
- Natural Resource Damage Restoration

2.1 LAKE MANAGEMENT ACTIVITIES

The OU-3 ROD did not include CDA Lake in the Selected Remedy. The ROD anticipated that the State, Tribe, federal agencies, and local governments would implement a Lake Management Plan (LMP) outside the Superfund process using separate regulatory authorities.

The updated LMP has been prepared and approved for implementation. Implementation of the 2009 LMP will be an adaptive management process and adjustments may be necessary as monitoring and other data are obtained and analyzed.

As referenced in Subsection 4.5.1 of the 2009 LMP, many of the agencies, governments, and other stakeholders that address water quality in CDA Lake are represented on the BEIPC, TLG or CCC. As such these various BEIPC forums represent unique opportunities for LMP coordination and implementation which IDEQ and the Tribe intend to fully utilize.

Examples of coordination activities envisioned for implementation of the 2009 LMP include, but are not limited to the following:

1. Provide routine updates on implementation activities at each BEIPC meeting with the intention to coordinate with agencies/governments represented on the Commission;
2. Engage nutrient management partners on the TLG to review Management Action Table (MAT) activities and work to better understand how to develop partnerships and joint plans for nutrient reduction projects;
3. Present draft yearly monitoring plans for TLG review and comment and present yearly monitoring results;
4. Present draft annual work plans to the TLG for review and comment; and
5. Provide an annual overview of LMP implementation activities to the CCC and solicit their input.

This level of coordination within the BEIPC will maximize opportunities for information exchange and advice working under the BEIPC MOA and work plans.

2.2 FUNDING FOR THE ENVIRONMENTAL CLEANUP AND INFRASTRUCTURE REVITALIZATION

Funding for the human health element of the Superfund (CERCLA) remedy is currently provided by the EPA and the States on private and state lands. The Federal Land Management agencies are currently providing funding for human health and ecological system cleanup actions on federally managed lands. Funding for EPA to implement the remedies in OU-2 and 3 is currently prioritized on implementation of the Human Health protection. Funding for the infrastructure revitalization activities is currently being addressed in the Drainage Control Infrastructure Revitalization Pro Plan (DCIRP) process.

There continues to be a great deal of discussion and concern expressed over the lack of funding sources in the future for implementation of the ecological remedy in OU-2 and 3 and implementation of the DCIRP. The Funding PFT developed a potential funding source spread sheet in fall 2008 for use in securing funding for the DCRIP and flood prevention programs. The funding acquisition work will include prioritization of systems segments, the study and determination of the best processes for rehabilitation, and preparation of preliminary designs and estimates to support efforts in meetings with local governments, taxing districts boards, local stakeholders and the general public. The BEIPC will assist Upper Basin communities and utilities in pursuing funding to implement the DCIRP and flood control efforts to upgrade and certify the levee system.

Federal funding of CERCLA activities on state and private lands outside of the EPA's appropriation for CERCLA is not allowed, but the PFT will continue investigate opportunities to fund these activities from other sources.

2.3 COMMUNICATIONS AND PUBLIC INVOLVEMENT

During 2010, the Communications PFT will continue to address issues concerning the strengthening of public involvement and education in BEIPC activities and communication between the Basin community and the BEIPC and CERCLA cleanup and

natural resource restoration implementing agencies. The CCC will continue to be the focus organization to assist in implementing this process.

Following is a partial listing of communications and public involvement work items:

- Work with the Executive Director on requests for presentations to public groups.
- Conduct audience analysis for reworking the BEIPC tri-fold brochure produced by the Communications PFT in 2008 and revised in 2009.
- Produce communications pieces for possible mass distribution and target audiences.
- Provide assistance to BEIPC groups and staff who are making verbal or written public presentations on issues such as information sessions; Op-Eds, news articles, public releases, display ads, etc.
- Continue to update avenues of outreach in the CDA Basin.
- Examine alternative communication tools such as local radio, television, and workshops, etc.
- Develop involvement categories to structure communication/outreach activities.
- Continue efforts on increasing public attendance at meetings and provide assistance when requested at other CDA Basin or agency related events such as open houses, etc.

2.4 NATURAL RESOURCE DAMAGE RESTORATION

CERCLA natural resource trustees in the Coeur d'Alene Basin are the United States, represented by the U.S. Forest Service, U.S. Fish & Wildlife Service and U.S. Bureau of Land Management, the Coeur d'Alene Tribe, and the State of Idaho. In 2007, the federal and tribal trustees, who comprise the Coeur d'Alene Basin Natural Resource Trustees (Trustees) selected the preferred alternative for the final interim restoration plan and environmental assessment. The State of Idaho adopted the Trustee's preferred alternative. The projects under the selected alternative of the Trustees' interim restoration plan will be implemented using funds that the Trustees have recovered through CERCLA natural resource damage settlements with potentially responsible parties, or other funding as available for the purpose of natural resource restoration. The Trustees continue to coordinate with the BEIPC as the Trustees move toward implementing the projects under the Trustees' interim restoration plan. The BEIPC and the Trustees are continuing to improve coordination regarding Basin remediation and restoration projects.