BEIPC Coeur d'Alene Basin Calendar Year 2011 Work Plan

INTRODUCTION

This plan covers environmental cleanup and improvement activities in the Coeur d'Alene Basin scheduled for CY 2011 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 2011-2015 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 2011. This work plan for 2011 is organized as follows:

Part 1 – Environmental cleanup work performed through the federal Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) by the EPA and State of Idaho or work performed by responsible parties.

Part 2 - Other BEIPC Activities and Responsibilities

Part 1 includes work to implement the Record of Decision (ROD) for Operable Unit 3 (OU-3) and the Upper Basin ROD Amendment for OU-2 and 3 when approved.

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 – ENVIRONMENTAL CLEANUP WORK

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. Funds obtained through EPA's CERCLA program 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 program support and 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 for CY 2011 and work anticipated to be performed by any responsible parties. The proposal includes the following work:

- Repository Development and Management
- Residential and Community Property Remediation including Private Drinking Water Supply; Basin Property Remediation Program (BPRP).
- Blood Lead Screening in Children
- Recreation Use Areas
- Remedy Protection Projects
- Upper Basin Remedies
- Lower Basin Remedies
- Basin Environmental Monitoring

1.1 REPOSITORY DEVELOPMENT AND MANAGEMENT

Background

Repository development and management is an ongoing process that must address the demand for mining-related contaminated waste disposal for the entire Basin environmental clean up program including the Basin Property Remediation Program (BPRP) performed by IDEQ, cleanup actions for human health and ecological remedies performed by EPA and responsible parties, and waste generated from 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 EPA is in the support role and provides funding for this task. The effort is coordinated with the BEIPC.

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 waste since 2002. As of September 2010, the BCR has received approximately 455,000 cubic yards (cy) of waste material, over 90% of the 500,000 cy design capacity. The BCR is located at the mouth of Big Creek and currently serves the Upper Basin.

The EMF is located north of Interstate 90 near Exit 39. Construction at EMF commenced in August 2009 and was completed in 2010. Contaminated waste was disposed of at EMF through the 2010 season. During the 2010 season, EMF received approximately 15,000 cy of contaminated waste. In two years of operation EMF has received approximately 40,000 cy of waste material, about 10% of the total waste soil capacity at this facility.

Objectives

The Repository Work Plan centers on four objectives: (1) operations at BCR and EMF; (2) increasing repository volume in the Upper Basin; (3) revision of the Waste

Management Strategy (WMS); and (4) repository cover performance monitoring. Specific tasks to achieve these 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 2011 field season. Based on past BPRP productivity rates, an estimated 50,000 to 70,000 cy of waste material could be generated by the BPRP in 2011. Additionally, ICP waste volume projection for next year is estimated to be as high as 10,000 cy combined for both BCR and EMF (based on 2009-2010 averages). Anticipating that need, the repository operations include but are not limited to the following tasks: receiving and placement of BPRP and ICP waste soil at a rate comparable to 2010; and segregation and appropriate placement or disposal of non-soil waste associated with remediation activities. These non-soil waste materials include such items as wood and root wads, concrete and miscellaneous demolition debris. Other tasks associated with repository operations include: equipment decontamination, site stabilization, erosion and sediment control installation, and surface and ground water monitoring and associated reporting.

Increasing Upper Basin Repository Volume

Projected disposal needs for Upper Basin remedial action and ICP waste will be greater than the current remaining capacity of BCR. The future capacity needs will be addressed by two initiatives in the Upper Basin: expanding the fill placement area on the north side of BCR; and initial design for one new repository at the Osburn Tailings Impoundment area (OTI). These activities will be performed in sequence during 2011.

Concept designs performed in 2010 suggest that adding material to the north side of BCR within the existing BCR planning area may add as much as 130,000 cy capacity to the repository. Studies performed in 2010 indicated fill placement within this area will have no significant impacts on wetlands, threatened or endangered species, cultural resources, surface or ground water, or visual resources in the area. The north side fill site will efficiently integrate into BCR through use of the existing internal road system and decontamination facility. The 2011 work plan for this area includes completion of technical evaluation of proposed expansion area and production of the final design document, site preparation, and fill placement plan. Site clearing and grubbing is planned to start early 2011 depending on weather conditions with the objective of having the area ready to receive waste in summer 2011.

The OTI area is one of two suitable repository sites identified during the selection process completed in 2010. The other site is the Star Tailings Impoundment (STI) near Woodland Park on Canyon Creek. The selection process incorporated citizen preferences and priorities in evaluation of the potential repository sites. Technical evaluation of OTI will proceed before STI because two new Upper Basin repositories are not needed simultaneously and OTI is located in the main river valley adjacent to the populated areas where the majority of work is slated in the near term.

Results of the site characterization investigation performed in fall 2010 will be used to develop a 30% Design Report for OTI. The report will outline the location of principal features such as the repository footprint, access roads, decontamination area, and monitoring well network. The report will also include concept-level liner and cover designs and fill plans and stormwater management plans. Based on the current project development schedule, the report will be available for public review and comment in fall 2011.

Waste Management Strategy Revision

The WMS is a key document that guides repository siting. It contains future waste volume and schedule predictions within geographic areas. The WMS will be updated to incorporate additional information regarding the status of OU-3 remedial activity and repository needs identified in the upcoming Upper Basin ROD Amendment. The revised WMS will be developed jointly by IDEQ and EPA and in coordination with the Repository Project Focus Team (PFT)

Waste Disposal Alternatives

The EPA and IDEQ are working with the Panhandle Health District and Shoshone County Commissioners to develop alternatives for disposal of metals-contaminated soil originating within the Area of Contamination. The disposal method, commonly referred to as the Community Fill Program (CFP), being reviewed would consist of placing contaminated fill on properties to provide for site development within the Area of Contamination as an alternative for disposal at repositories. The goal of this task is to have a viable CFP in place for the 2011 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. Public comment will be taken on the draft CFP when it is in proper form for review.

To serve additional Upper Basin cleanup in remote side drainages such as the East Fork of Ninemile Creek, local waste disposal options will need to be reviewed in that drainage. The preferred option could consist of area consolidation at mine and mill wastes sites as has been employed at other mine and mill cleanups in the Basin. This option will be more fully explored during the remedial design data collection stage for the given sites.

Test Cover Performance Monitoring

The design cover system at both BCR and EMF consists of an evapotranspiration (ET) cover. The ET cover systems originally were intended for use in arid climates, but performance modeling results summarized in the BCR and EMF Design Reports indicate that ET covers will be effective in the CDA Basin as well. Test cell construction and monitoring will provide a means to assess cover effectiveness in this weather regime. The test cell will be approximately 60 feet long by 30 feet wide, and will be constructed in accordance with design specifications on waste soil placed at final elevation on the

south side of BCR. Instruments will be incorporated in and below the cover materials to measure the amount of water passing through the cover into the underlying waste material. Test cell performance data will be summarized is a section of the BCR Annual Report to be issued in spring 2011.

1.2 HUMAN HEALTH ISSUES

Remediation of human health exposures is a remedial action priority as defined in the OU-3 Interim 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 2011 IDEQ plans to remediate approximately 350 properties with the BPRP. The properties will be located in target areas throughout the Upper 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 10% 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 remediation program included an increase in the number of properties that have been previously remediated annually. The increase work effort was due to the availability of Stimulus funding provided through the American Recovery and Reinvestment Act. Stimulus funding became available to the residential areas remediation program in July 2009 and continued to be utilized through the 2010 program. The 2010 season work load was back down to the more common 300 to 350 properties. 100% of the Stimulus funding was spent during the 2009 and 2010 remediation programs. A total of \$16.8 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 2011 program.

In 2011 IDEQ plans to sample approximately 625 targeted property equivalents, or 250 property addresses. The targeted areas sampling program is estimated to be close to completion by the end of 2012.

Current estimates for the number of properties remaining to be sampled differ from previous estimates for a number of reasons. First, the estimation methods have been refined as property research continues and additional GIS information is added and updated. Second, previous estimates did not include properties where owners have refused to have their properties sampled, and the number of refusals constantly changes. Third, some parcels located outside the ICP Administrative Boundary have now been included in the BPRP, primarily to include certain "high-risk" properties and other

properties within the geographic vicinity of the boundary. Finally, parcel estimates do not easily convert to property counts. The estimated number of properties remaining to be sampled will continue to fluctuate as IDEQ reviews and confirms whether parcels are eligible for the BPRP. Based on current estimates there will be approximately 250 property addresses sampled in 2011and approximately 150 property addresses sampled in 2012. By 2013 there will be an estimated 250 property addresses remaining to be sampled that are categorized as refusals or unable to contact owners. The actual number of properties sampled in the final years of the BPRP program will be dependent on whether some of these remaining properties become available for sampling.

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.

There have been concerns that there could be greater participation in the child blood lead testing program. In June of 2010 EPA, the Panhandle Health District (PHD), and IDEQ hosted a community workshop to identify ideas to increase child participation rates under the auspices of the Human Health PFT. Participants included the Idaho Department of Health and Welfare, the Agency for Toxic Substances and Disease Registry (ATSDR), the Lands Council, Kootenai Environmental Alliance, Shoshone County Commissioners, and several area residents. The notes from the meeting have been posted on the BEIPC website at http://www.basincommission.com/News.asp. The results of that workshop will be evaluated to determine potential program modifications directed towards increasing participation in blood-lead testing activities conducted annually by PHD.

The blood-lead screening program will continue in 2011. The program may be modified from previous years based on the evaluation of ideas generated at the community workshop. No modifications have been identified to date.

1.2.3 Recreation Use Activities

The OU-3 Interim 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.

In 2010, the TLG decided to move the work from the Recreation Areas PFT to 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. The remediation and development principles identified by the Recreational Area PFT (below) remain appropriate for the 2011 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.

2011 Tasks

Specific tasks for this coming year have not been completely identified by the Lower Basin PFT but could 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.

1.2.4 Remedy Protection Projects

Remedy Protection is a significant category of work in the current Proposed Remedial Action Plan and has been determined to be a high priority in the Upper Basin ROD Amendment Implementation Plan by the Upper Basin Project Focus Team. The objective of this work is to protect the installed human health related remedy from recontamination and scouring caused by heavy precipitation and tributary flooding. The 2011 BEIPC work plan will include initiation of remedy protection projects. Once the Upper Basin ROD Amendment is signed, work will begin on a remedy protection project included in the Amendment. The selected remedy protection project will be one that provides a high degree of protection to installed human health related contamination barriers based on a prioritization that will be concluded in early 2011. The amount of work completed in 2011 will depend on when the Amendment is signed and the project selected. The 2011 work will most likely be pre-design and design with the possibility of construction in 2011.

1.3 ENVIRONMENTAL REMEDIATION ISSUES

Environmental remediation issues under consideration by the BEIPC include environmental work in the Upper and Lower Basin described in the Interim ROD for OU-3 and the ROD Amendment for OU-2 and 3 in the Upper Basin when implemented.

1.3.1 Upper Basin 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.

During 2010 a draft and draft final Upper Basin Focused Feasibility Study (FFS) were developed to support release of a Proposed Cleanup Plan for implementation of an Upper Basin ROD Amendment. After a ninety-day extension, the comment period on the Proposed Cleanup Plan ran until November 23, 2010. During early 2011, EPA will respond to comments and consider appropriate changes in the draft cleanup plan and FFS. The selected remedy will be documented in a ROD Amendment which is expected to be issued by EPA in mid 2011. Additional information about the ROD Amendment for the Upper Basin 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

In coordination with the development of the ROD Amendment, a priority setting process has been underway which will identify a 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,
- Focusing on particulate lead, and
- Protecting 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 Coeur d'Alene 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.

Initiation of specific designs and construction of selected remedial actions will depend on a number of factors including availability of funds, execution of a State Superfund Contract for options requiring long-term operation and maintenance such as water

treatment, the availability and capacity of repositories, and implementation of actions by potentially responsible parties.

Given the schedule for completion of a ROD Amendment for the Upper Basin in 2011, this BEIPC 2011 work plan focuses only on those cleanup actions that are in an existing decision document (either for OU-2 or OU-3). The following is expected to be the focus of the work conducted by the Successor Coeur d'Alene Custodial and Work Trust (SCCWT) in 2011.

- 1. Collection of pre-design data at the Interstate Callahan mine site, waste rock area, and mill area in the East Fork of Ninemile Creek. To the extent time allows additional data will be collected in the vicinity of the Tamarack sites and Success site in the East Fork. Data collection will include information on property ownership and development of access agreements in this area. These sites have all been identified as a high priority in the Draft Implementation Plan that has been shared with the TLG and Upper Basin PFT and the CCC. They are also sites that have been included in the OU-3 2002 Interim Remedy.
- 2. Collection of data within the East Fork of Ninemile Creek in the vicinity of the Success site for the purpose of designing a stream crossing structure in this area. This will facilitate the planned construction work further up in the East Fork during 2012.
- 3. Construction of the remedy at the USBM site in Osburn. A 90% design has been completed at this site and construction is being planned for 2011.

1.3.2 Lower Basin Remedies

Work described in the OU-3 Interim ROD for the Lower Basin includes actions for wetlands and lateral lakes, river banks, splay areas and river bed. Objectives of remediation in the Lower Basin focus on reducing metals in the Basin ecosystem, lead in particular.

There continues to be significant data gaps pertaining to the relationship between Basin ecology and ongoing effects and movement of mining related contamination. In the past, Clean Water Act sub-grants were approved by the BEIPC to identify site-specific information required in order to make sound ecological remedial management decisions. In 2010, the remaining CWA projects and studies were completed and in the event that future funding is identified, these CWA projects will be monitored for effectiveness.

As a first step in expanding the working hypothesis for the Lower Basin, the 2000 Conceptual Site Model for the Coeur d'Alene Basin developed by EPA was updated for the Lower Basin and captured in the Enhanced Conceptual Site Model (ECSM). In 2010, EPA finalized the development of the ECSM for the Lower Basin. The ECSM refines 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 2009-2010 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 fall 2009 and spring 2010 for comment and input. A path forward for planning was discussed at the fall 2010 meeting. Critical data gaps will continue to be filled in 2011 to facilitate the development of a computational model. Data collection and model development will include 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.

In 2011, the Lower Basin PFT will continue to assist the TLG and provide updates on new technologies and project ideas in order to implement the ROD for OU-3 where remedial actions are identified and where the potential for recontamination is low; the Lower Basin PFT will continue to identify recreational areas in the Lower Basin that could benefit from remedial and restoration work and are of low risk of recontamination; the BEIPC will support EPA in an effort to secure funding from EPA Headquarters; and will task the Funding PFT with developing outside sources of funding for Lower Basin remedies as appropriate.

1.4 BASIN ENVIRONMENTAL MONITORING

The 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 OU-3 RA Effectiveness Monitoring Program (2007). EPA is working with the Lower Basin 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 and 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 surface water, sediment, groundwater, and biological resources 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, sediment, groundwater and biological resource conditions in the Basin.
- Evaluate progress toward meeting remedial action objectives (RAOs), applicable or relevant and appropriate requirements (ARARs), and preliminary remediation goals (PRGs).

- Improve the understanding of Basin environmental processes and variability to improve the effectiveness and efficiency of remedial actions.
- Provide data for CERCLA required Five-Year Reviews of remedy performance.

During 2010 efforts were underway to revise the BEMP into a Comprehensive monitoring document. During this period of time the long-term status and trends were conducted under the existing OU-3 BEMP. In addition sampling under the existing OU-2 EMP and OU-3 RA effectiveness monitoring continued under the existing plans. During late 2010 EPA took steps to finalize the Comprehensive BEMP through the TLG for implementation in 2011. While this will become a final document the overall goal of the BEMP will be continued revision of QAPPs/FSPs that reflect the focus for the ongoing and upcoming cleanup work. This basically means focusing OU-2 and RA effectiveness monitoring on key areas where work is either planned and/or conducted.

EPA will continue to make analytical results from site surface water, sediment, and groundwater 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 2011 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, Flood Control, and Infrastructure Revitalization
- Communications and Public Involvement
- Natural Resource Damage Restoration

2.1 LAKE MANAGEMENT ACTIVITIES

The OU-3 Interim ROD did not include CDA Lake in the Selected Remedy nor is there a remedy identified in the proposed Upper Basin ROD amendment that is scheduled to be finalized in 2011. The OU-3 Interim ROD anticipated that the State, Tribe, federal agencies, and local governments would implement a Lake Management Plan (LMP) outside the CERCLA (Superfund) process using separate regulatory authorities.

The updated LMP was approved in 2009 and implementation has been underway. Implementation of the LMP is 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 activities envisioned for implementation of the LMP in 2011 include, but are not limited to the following:

- 1. In 2010, the Tribe and IDEQ initiated the 3 Year Nutrient Source Inventory (as identified in Section 3.3, Objective 3 of the LMP) in the St. Maries/ St. Joe watersheds. The Tribe and IDEQ selected 6 sites where water quality monitoring will continue to be collected throughout 2011.
- 2. Continue joint water quality monitoring throughout Coeur d'Alene Lake for metals, nutrients, physical parameters, and biological communities. Throughout 2011, the Tribe and IDEQ will continue to learn and utilize the ELCOM-CAEDYM and LOADEST models. These models are utilizing real-time data that is collected from Coeur d'Alene Lake including the establishment of four meteorological stations.
- 3. Present the draft 2009 annual monitoring report for TLG review and comment.
- 4. Participate in Coeur d'Alene Basin Watershed Advisory Groups in order to re-assess Total Maximum Daily Load (TMDL) and develop Implementation Plans.
- 5. Participate in joint educational outreach events such as the North Idaho Fair.
- 6. Utilize final Needs Assessment report from Robinson Research to develop an LMP Education/Outreach Program.
- 7. The Tribe will continue to implement the invasive Aquatic Plant Survey and Treatment Program within their current jurisdiction. IDEQ will initiate a long-term program of aquatic plant surveys within northern pool bays.
- 8. Finalize the inventory of eroding riverbanks in the St. Joe and lower St. Maries Rivers. IDEQ and Tribal staff will prioritize and initiate riverbank stabilization projects in collaboration with Avista, the Natural Resource Conservation Service (NRCS), the Counties, and local landowners.
- 9. The LMP Coordinators will continue to be involved in the Lower Basin PFT in the potential implementation of projects identified in the 2002 OU-3 Interim ROD.

- 10. Present LMP activity updates to various groups throughout the year such as the North Idaho/Washington Lakes Conference, Homeowners Associations, Environmental Organizations, and Chambers of Commerce.
- 11. Provide an annual overview of LMP implementation activities to the CCC and solicit their input.
- 12. Continue to participate on an Advisory Committee to support the University of Idaho Extension Master Water Steward Program (IDAH20).

This level of coordination with BEIPC forums will maximize opportunities for information exchange and advice working under the BEIPC MOA and work plans. Future coordination with the BEIPC recognizes that IDEQ and the Tribe retain their respective decision making authorities under CERCLA and the Clean Water Act (CWA).

2.2 FUNDING FOR THE ENVIRONMENTAL CLEANUP, FLOOD CONTROL AND INFRASTRUCTURE REVITALIZATION

Funding for the BPRP in 2011 will be provided by the EPA and the State of Idaho on private, state, county and local government lands. The Federal Land Management agencies will provide funding for human health and ecological system cleanup actions on federally managed lands. For the near future, funding for implementation of additional human health and ecological remedies in OU-3 will be provided through the Successor Coeur d'Alene Custodial and Work Trust (SCCWT). Developing a Flood Control program including levee evaluation and required upgrade plus seeking a funding source for the work has been assigned to the BEIPC Executive Director. Funding for the infrastructure revitalization activities is currently being addressed in the Drainage Control Infrastructure Revitalization Plan (DCIRP) process.

The BEIPC through the office of the Executive Director has been working on seeking funding for an analysis of flood control needs and the existing levee system in the South Fork CDA River and Pine Creek. Working with the U.S. Army Corps of Engineers and the office of Senator Crapo, a project authorization request under the Water Resources Development Act has been submitted to the Senate Environment and Public Works Committee for consideration. In 2011, that effort will be continued. The Executive Director will continue to work with the Idaho Silver Jackets organization including the COE, FEMA, Idaho Bureau of Homeland Security, Idaho Department of Water Resources, and the U.S. Weather Service to develop an approach to dealing with potential flooding problems and levee management in the Upper Basin. The BEIPC will continue to assist Upper Basin communities and utilities in pursuing funding to implement the DCIRP.

2.3 COMMUNICATIONS AND PUBLIC INVOLVEMENT

During 2011, 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:

- 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.
- Participate in a joint fair booth for public outreach/education at the North Idaho Fair.
- Work with the Executive Director on requests for presentations to public groups.
- Continue work with the Recreation Education subcommittee.
- 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.
- Produce communications pieces for possible mass distribution and target audiences.
- Examine alternative communication tools such as local radio, television, and workshops, etc.
- Continue to update avenues of outreach in the CDA Basin.

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, particularly through Project Focus Teams and the Trustees will provide updates to the BEIPC on basin restoration projects. Throughout 2011, the Trustees will continue to move toward implementing restoration projects under the Trustees' interim restoration plan.

Some specifics on work that is scheduled to be conducted in 2011 include but are not limited to;

- <u>Pine Creek Restoration</u>- floodplain restoration activities will continue as well as monitoring.
- <u>Hepton Lake</u>- the report on levee stability and integrity will be finalized and the consultant will work with the Trustees on providing wetland restoration alternatives at the site.
- <u>Schlepp Easement Restoration</u>- ongoing habitat restoration and management in the east and west fields will continue as well as success monitoring.
- <u>Moon Creek-</u> ongoing monitoring (fish sampling and habitat quantity and quality) will continue.