November 18 BEIPC Meeting Packet Items

- Meeting Guidelines
- Draft November 18, 2020 Meeting Agenda
- Abbreviations and Acronyms
- Revised BEIPC Organizational Practices and Procedures
- Draft March 11 meeting minutes
- Draft 2021 BEIPC Work Plan
- Draft 2021-2025 Five Year Work Plan
- Approved September 30, 2020 TLG Meeting Notes

Amended 11/19/08

BEIPC MEETING GUIDELINES

- The Executive Director is directed to manage these guidelines.
- The agendas for BEIPC meetings are draft agendas and may be modified by the Commissioners by motion and majority vote at the beginning of the meeting to accommodate unanticipated program and scheduling changes.
- Parties requesting a scheduled time slot on BEIPC meeting agendas to present technical or other information shall discuss the request with the Executive Director a minimum of four (4) weeks prior to the meeting date. If the draft agenda can accommodate the subject matter and time needed for its presentation and at the request of the Executive Director, the requesting party shall forward an electronic copy of the proposal for the item to the Executive Director a minimum of three (3) weeks prior to the meeting date. If the item is of a technical nature, the Executive Director will present the technical proposal and or presentation to the TLG for information and review prior to the BEIPC meeting. TLG consideration of the proposal shall not prevent its presentation to the BEIPC.
- Parties making presentations needing overhead equipment, utilizing Power Point or other projection presentations shall furnish their own equipment or make arrangements with the Executive Director. Projection screens shall be provided by the BEIPC at meeting locations.
- At each BEIPC meeting, an open public comment and presentation period shall be set aside for any member of the public to make comments and presentations concerning the Basin or issues being discussed by the BEIPC and presenters on the meeting agenda. The Executive Director is responsible for adjusting the public comment periods on the agenda to ensure that the public is afforded the opportunity to comment concerning an issue of discussion at BEIPC meetings. Each presenter shall have a maximum of three (3) minutes to comment or make a presentation. These presentation times will be monitored by the Executive Director. Presenters shall be recognized by the Chair of the BEIPC meeting prior to speaking. If a presenter needs more time, they shall make arrangements with the Executive Director for a scheduled time slot on the agenda.
- Issues requiring BEIPC discussion and voting such as programs of work, five year work plans, annual work plans, and budget and funding issues shall be presented prior to the final vote on each such issue. The public comment time slot will be managed as outlined above.

Basin Environmental Improvement Project Commission

Draft Meeting Agenda

November 18, 2020 9:30 AM – Noon
IDEQ Regional Office Osprey Conference Room
2110 Ironwood Parkway, Coeur d'Alene, Idaho

Contingent upon current health & safety protocols, the public may attend in person or remotely via the internet and/or telephone. **Remote attendance is encouraged**. To request remote access to this meeting, or to request accommodations for language or disability via the internet and/or telephone, contact Terry Harwood by November 16th at terry.harwood@deq.idaho.gov or 208-783-2528

9:30 AM	Call to Order
9:35 AM	Approve the minutes from the March 11. 2020 BEIPC meeting **(Action Item)**
9: 45 AM	Review and Discuss Draft 2021 Annual Work Plan
10:15 AM	Public Comment and Input on 2021 Work Plan
10:25 AM	Approve 2021 Annual Work Plan **(Action Item)**
10:35 AM	CDA Lake NAS Review Process Update – Jamie Brunner, IDEQ
10:50 AM	Central Treatment Plant and Lower Basin Project Updates – Ed Moreen & Kim Prestbo, EPA
11:15 AM	Public Comment and Discussion Period
11:25 AM	Review and Discuss 2021-2025 Five Year Draft Work Plan
11:45 AM	Public Comment and Input on 2021-2025 Five Year Work Plan Work Plan
11:55 AM	Approve Five Year Work Plan **(Action Item)**
Noon	Adjourn

ABBREVIATIONS AND ACRONYMS

AMD: Acid Mine Drainage
ARAR: Applicable or relevant and appropriate requirement
ARRA: American Recovery and Reinvestment Act
ATV: All Terrain Vehicle
AWQA: Ambient water quality criterion/criteria
BCR: Big Creek Repository
BEIPC: Basin Environmental Improvement Project Commission
BEMP: Basin Environmental Monitoring Plan
BLM: Bureau of Land Management (US Department of the Interior)
BPRP: Basin Property Remediation Program
CCC: Citizens Coordinating Council
CDA: Coeur d'Alene
CDC: Center for Disease Control
CERCLA: Comprehensive Environmental Response, Compensation, and Liability Act
CIA: Central Impoundment Area
CICs: Community Involvement Coordinators
COC: Chemical of concern
CSM: Conceptual Site Model
CTP: Central Treatment Plant
CWA: Clean Water Act
DCIP: Drainage Control Infrastructure Revitalization Plan
ECSM: Enhanced Conceptual Site Model
EFN: East Fork Ninemile
EMFR: East Mission Flats Repository
EMP: Environmental Monitoring Program
EPA: Environmental Protection Agency
ERA: Ecological Risk Assessment
ESD: Explanation of Significant Differences
FFS: Focused Feasibility Study
FS: Feasibility Study
GPM: Gallons per Minute
HH PFT: Human Health Project Focus Team
I-90: Interstate 90
I-C: Interstate-Callahan
I & I: Inflow and Infiltration
ICP: Institutional Controls Program
IDAPA: Idaho Administrative Procedures Act
IDEQ: Idaho Department of Environmental Quality
IDFG: Idaho Department of Fish and Game
IDPR: Idaho Department of Parks and Recreation
ITD: Idaho Transportation Department
LLC: Limited Liability Company
IP: Implementation Plan
LBC: Lower Basin (Citizen's) Collaborative
LBCR: Lower Burke Canyon Repository
LMP: Lake Management Plan
MAU: Multi-attribute utility
MOA: Memorandum of Agreement

NCP: National Contingency Plan
NPL: National Priorities List
NRDA: Natural Resource Damage Assessment
NRRT: Natural Restoration Resources Trustees
OSWER: Office of Solid Waste and Emergency Response (EPA)
OTI: Osburn Tailings Impoundment
OU: Operable Unit
PFT: Project Focus Team
PHD: Panhandle Health District
PM: Project Managers
PRP: Potentially Responsible Parties
PRRACA: Paved Road Remedial Action Cooperative Agreement
QA/QC: Quality Assurance / Quality Control
RA: Remedial Action
RACA: Remedial Action Cooperative Agreement
RAO: Remedial Action Objectives
RD: Remedial Design
RI: Remedial Investigation
RI/FS: Remedial Investigation/Feasibility Study
RPM: Remedial Project Manager
RP: Remedy Protection
ROD: Record of Decision
RODA: Record of Decision Amendment
ROW: Right-of-Way
SARA: Superfund Amendments and Reauthorization Act
SCIP: Superfund Cleanup Implementation Plan
SFCDR: South Fork Coeur d'Alene River
SJTI: Superfund Job Training Initiative
SOP: Standard Operating Procedure
SSC: State Superfund Contract
SST: Superfund Straight Talk
STI: Star Tailings Impoundment
SVNRT: Silver Valley Natural Resource Trust
TCD: Typical Conceptual Design
TLG: Technical Leadership Group
Trust: Successor Coeur d'Alene Custodial and Work Trust
UMG: Upstream Mining Group
UPRR: United Pacific Railroad
USDA: United States Department of Agriculture
USFWS: United States Fish and Wildlife Service
USGS: United States Geological Survey
WAC: Waste Acceptance Criteria
WCA: Waste Consolidation Area
WMS: Waste Management Strategy
WENI: West End Natural Infiltration Area
WCX: Waste Quality Exchange
WY: Water Year

Revised BEIPC

Organizational Practices

and

Procedures

Revision Date: May 28, 2003

Basin Environmental Improvement Project Commission Board
Organizational Practices and Procedures

INTRODUCTION/OVERVIEW

The Basin Environmental Improvement Project Commission (Basin Commission) is established by Idaho State law to implement, direct, and/or coordinate environmental remediation, natural resource restoration, and related measures to address water quality and heavy metal contamination in the Coeur d'Alene Basin[1] of Idaho in a manner that is protective of human health and the environment, and consistent with local, state, federal, and tribal participation, resources, and authorities. The Basin Commission works through the direct exercise of certain authorities of the state of Idaho (as described in Section 39-8106 of the enabling legislation) and through its coordination with other entities and government and their exercise of independent authorities.

FUNCTIONS

The primary purpose and foundation of the Basin Commission's work is to implement the 2002 Record of Decision approved pursuant to the federal Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended (CERCLA), implement/coordinate the Lake Coeur d'Alene Management Plan, and implement/coordinate other plans to address heavy metal contamination in the Coeur d'Alene Basin. Future related Records of Decision issued by the USEPA, with concurrence from the Idaho Department of Environmental Quality and the Coeur d'Alene Tribe, as appropriate, may be incorporated into the Basin Commission's work.

Key functions of the Basin Commission Board are to:

1. Annually approve its one- and five-year workplan, including annual priorities and budget;
2. Develop one- and five-year progress/activity reports;
3. Direct the implementation of its workplan;
4. Appoint an Executive Director to assist the Board in administering its workplan;
5. Receive advice from the Technical Leadership Group (TLG) and Citizen Coordinating Council (CCC) on technical and regulatory issues before the Board;
6. Consult with, and represent the interests and concerns of, organizations, entities, and constituencies it represents;
7. Regularly review the membership and functionality of the two groups (TLG and CCC) established to provide advice to the Board on technical, regulatory, and other issues; and
8. Exercise other duties as described in the Idaho legislation in Section 39-8106.

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[1] The Basin Commission conducts its work in the Coeur d'Alene Basin of Idaho, which includes the watershed of Coeur d'Alene Lake within the counties of Shoshone, Kootenai, and Benewah, as well as the Coeur d'Alene Reservation located within the state of Idaho. Remedial actions, authorities, and duties to be exercised in Washington shall be undertaken independent of the Basin Commission's operational framework.

MEMBERSHIP

Per Idaho Public Law 39-8106(3), the Board shall include one (1) representative of the State of Idaho and one (1) representative for each of the county Commissions of Shoshone, Kootenai, and Benewah counties of the State of Idaho as appointed by the Governor of the State of Idaho. Through agreement or compact, the Board shall also include one (1) representative of the State of Washington appointed by the Governor of Washington, one (1) Tribal Council member of the Coeur d'Alene Tribe appointed by the council of the Coeur d'Alene Tribe, and one (1) representative of the United States of America appointed by the President of the United States of America.

Alternates: The appointing authority of each Commissioner may designate a primary alternate who may attend Board meetings in the event the Commissioner cannot attend.

Proxies: Proxies shall not be used for any purpose.

Filling Vacancies: Board vacancies shall be filled using the same process and criteria used to establish the Board (described above and summarized in Idaho Public Law 39-8106(3).

ORGANIZATIONAL STRUCTURE

Chairperson: The Board shall elect from its own members a chairperson whose term of office shall be two years and who can be re-elected. The chairperson shall be responsible for convening and managing Board meetings and shall work with the Basin Commission Executive Director (or staff) and the chairs of the TLG and CCC to set meeting agendas. If a vacancy occurs, the Board shall fill such a vacancy for the unexpired term at its next meeting.

Vice-Chairperson: The Board shall elect a vice-chairperson in the same manner as the chairperson. The vice-chairperson shall serve as chairperson in that person's absence.

Secretary-Treasurer: The Board shall elect a secretary-treasurer in the same manner as the chairperson. The secretary-treasurer shall be the primary point of contact between the executive director and the Basin Commission for ensuring preparation by the executive director or other appropriate staff of meeting summaries, records of financial transactions and an annual public accounting for presentation to the Basin Commission.

Staff Support: To the extent resources allow, the Board shall hire and assign staff, including an Executive Director, to provide administrative support to the Basin Commission Board to support its overall deliberations. The staff shall be responsible for making logistical arrangements, distributing agendas and meeting materials up to seven (7) days in advance of a Board meeting, providing for adequate public notice of the meeting, and preparing Board meeting summaries. As well, the Basin Commission staff, through the Executive Director, will help arrange opportunities for the Board to interact with the representatives of the Citizen Coordinating Council and the Technical Leadership Group, and the Public.

MEETING SCHEDULE/STRUCTURE

Meeting Schedule: The Basin Commission Board shall meet at least four times per year. The Board shall fix a predictable sequence of meeting dates. Board meetings shall occur throughout the area of the Basin Commission's jurisdiction. All meetings shall be announced in area newspapers (e.g., the Coeur d'Alene Press, Shoshone News Press, Spokesman Review [Idaho and Washington], Idaho News Observer, St. Maries Gazette) and shall be posted on the Basin Commission's website. Meeting times and dates shall be arranged to best meet individual Commissioner's schedules. Commissioners can attend meetings by telephone or videoconference, if suitable arrangements can be made.

Agendas: Basin Commission Board meeting agendas shall be developed by the Board chairperson, in consultation with the TLG and CCC chairs and the Basin Commission Executive Director (or staff, if not available). Every effort shall be made to circulate to the Board, the TLG, and the CCC membership and post to the Basin Commission website any agendas and meeting information at least seven (7) days in advance of the meeting. All Commissioners shall make a strong effort to identify and include in the proposed meeting agendas any issue upon which the Board may be asked to vote. The chairperson shall every effort to notify board members of any meetings that include One-Year or Five-Year workplan final decisions at least twenty (20) days in advance of the meeting.

Meeting Summaries: A designated member of the Basin Commission staff shall develop and circulate to the Board and staff for review the Board meeting draft summaries. In accordance with Idaho Open Meeting Law (at Idaho Code 67-2344), meeting summaries shall include a record of all Commissioners who are present, as well as note of all motions and resolutions proposed and their disposition and the results of all votes. Every effort shall be made to circulate these summaries within ten (10) days of every Board meeting. Final meeting summaries shall be posted on the Basin commission website and circulated to Commissioners and any other person requesting them. Every effort shall be made to rely on electronic media. All meeting summaries and Commission records shall be archived and made available to the public upon request in a timely manner.

Public Comment: All Basin Commission Board meetings shall be open to all interested parties, in accordance with the Idaho Open Meeting Law (Idaho code 67-2340 through 67-2347). Opportunity for public comment shall be provided at every official Board meeting. During this time, members of the public shall be allowed to address the board when recognized by the chairperson. The chairperson may ask individuals to limit testimony to five minutes per individual speaker and ten minutes per group. As well, members of the public shall be permitted to file written statements with the Board at any time.

Executive Session: By a two-thirds vote of the Commissioners, the Basin Commission may hold an executive session to continue deliberations, as set forth in Idaho code 67-2345. No executive session may be held for the purpose of taking any final action or making any final decision.

Expenses: All Commissioners serve without compensation by the Basin Commission. Commissioners may be reimbursed for expenses according to their participating governmental entity's rules and regulations.

DECISIONMAKING

Voting: According to Idaho Code 39-8106(4), "the board shall act by majority vote except that the vote of any Commissioner representative of the State of Idaho, the Coeur d'Alene Tribe or the United States of America, or the unanimous vote of all three (3) Commissioners representing Shoshone, Kootenai, and Benewah counties may veto any majority vote."

Quorum: A quorum shall be required for any meeting of the Commission Board. A minimum of four (4) Commissioners or designated alternates shall be in attendance to constitute a quorum. An action of the Board requires a majority vote of the Commissioners, not a majority vote of the quorum.

Good Faith: All Commissioners agree to act in good faith with respect for the interests and concerns of other commissioners. The Commissioners agree to establish a free, open, and mutually respectful exchange of views, ideas, and information. Personal attacks and prejudiced statements will not be tolerated.

Parliamentary Procedure: *Robert's Rules of Order Newly Revised* shall be the authority for all questions of procedure at any Basin Commission Board meeting. The chairperson (or vice-chair) shall be responsible for assuring proper procedures are followed.

Press Inquiries/Contact: In responding to inquiries from or initiating contact with the press or other media representatives, Commissioners agree to refrain from characterizing the views of opinions expressed by other Commissioners and to exercise comity and appropriate restraint in commenting on the Board's deliberations and processes. Publicly available meeting summaries will identify specific recommendations or decisions made by the Board.

Adoption of Protocols: These Organizational Practices and Procedures become effective when a majority of the Board votes to adopt them.

Amendments: These OrganizationalPractices and Procedures may be altered, amended, or repealed and new Organization Practices and Procedures may be adopted by a majority of the Board. These Organizational Practices and Procedures shall not be altered, amended, or repealed, nor shall any new protocols be adopted at any regular meeting of the Board unless notice of such is given with twenty (20) days notice.

DRAFT

BASIN COMMISSION (BEIPC)

March 11, 2020

MEETING MINUTES

Basin Environmental Improvement Project Commission

Draft Meeting Summary Minutes
March 11, 2020 9:30 AM – 3:30 PM
Panhandle Health District Office, 35 Wildcat Way, Kellogg, Idaho

These minutes are summary notes of the reports and presentations and are intended to capture key topics and issues, conclusions, and next steps and not every detail of discussion or individual quotes

Attendees included the following:
Terry Harwood (BEIPC Executive Director)
Commissioners and Alternates present:
Jack Buell (Benewah County), Brook Beeler (Washington State), John Tippets (IDEQ), Leslie Duncan (Kootenai County), Mike Fitzgerald (Shoshone County), Phillip Cernera (CDA Tribe), Ed Moreen (EPA), Michael McCurdy (IDEQ)
Staff present:
Gail Yost (BEIPC, Assistant to E.D., Note taker), Dan McCracken (IDEQ), Sandra Treccani (Washington State), Dana Swift (IDEQ), Jamie Sturgess (Kootenai County), Rebecca Stevens (CDA Tribe)

Call to Order and Pledge of Allegiance
The meeting was called to order by Commissioner Chair Jack Buell at 9:30 a.m. followed by the Pledge of Allegiance.

Approve Minutes from the November 20, 2019 Meeting. (Action Item)
John Tippets moved to approve the November 20, 2019 meeting minutes; Brook second, all approved **M/S/C**

Terry introduced the new congressional representatives from Fulcher and Risch's office

Review and Discuss Draft 2019 Annual Report
Terry presented the annual report of accomplishments made in 2019. This process includes putting together reports submitted from various agencies on how well they have done during the calendar year on projects that were outlined in the approved work plans.

Terry will present the CIC updates as Jerry Boyd is absent today. EPA will be conducting their 5-year review as well this year, as required, to ensure cleanup actions are protecting human health and the environment.

Specific accomplishments included: IDEQ and PHD community involvement activities; Lead Health Intervention program; BPRP Yard Remediation program; Remedy Protection projects; and Paved Roadway Surface Remediation program.

Terry stated the Remedy Protection program was completed in 2019 in the Box and Basin. Rebecca asked about the remedies proposed in the Lower Basin in which Terry answered they will not be Remedy Protection projects in the Lower Basin.

Paved Roads program has only Kellogg and Shoshone County roads left and a final report should be completed by 2022.

A short overview was given of the repositories in the Box and Basin. Phillip asked Terry about the closure of Big Creek and how much additional capacity would there be in the Big Creek Annex if Sunshine Mine were to start up operations. Terry answered that the capacity left in these repositories were for remedial action waste, not tailings. Ed Moreen clarified that each mining company has to have their own waste disposal facility and that the tailings would not go into the repository. He further explained that Sunshine still owned the tailings pond south of the repository, but wasn't sure of its capacity. Jack wondered if there were any other ways to dispose of waste instead of putting everything in the repository – Terry said in some past experiences there was value in reprocessing but usually not cost effective. Jack is worried that we may run out of room and Terry explained that we will have enough disposal places.

Terry continued to present Upper and Lower Basin remedies, State of Washington projects, Recreational sites, Basin Environmental Monitoring, Lake Management, Flood Control & Infrastructure Revitalization, and Restoration Partnership activities.

Dan Redline made a comment that the Annual Report is silent on budgets and costs spent for individual projects listed in the report. Terry said they decided not to detail these costs anymore, asked the Board what they thought. Dan McCracken stated this was easier to do when everything was federally funded and one source, much easier to summarize. Now there are several funding sources and adds a layer of complexity to summarize all in one place, this may be why the report was changed.

Ed asked if this information was a value to the Board, let us not task the people who have to put together this information additional work. If it's not a value then let's not put that effort together. Brook can see the value but at the same time not sure what the use would be other than a summary. John said that he could see the value as well and maybe there could be information added as it would be helpful to know what was estimated and spent.

Jack asked if the Board would like to make this change or leave it the way it is now. Terry agreed with Ed that it would take a lot of work – probably two months. Ed stated the difference between the ROD estimates vs. the contract bid amounts, the change orders along the way and trying to gage how successful the project is – what is the metric we are looking for that's a measure for financial success. Phillip agreed that can't be our goalpost for success.

Phillip made a motion to accept the 2019 Annual Report as is, Ed 2nd - all approved **M/S/C**

CDA Lake Update – Jamie Brunner, IDEQ; Rebecca Stevens, CDA Tribe

Rebecca showed a video from the Our Gem Symposium (view it on www.basincommission.com under Meetings – BEIPC Meeting Presentations – Our Gem Basin Commission Meeting Video)

Jamie Brunner, CDA Lake Management Coordinator, commented on the Our Gem Symposium video. They had a really good dialogue with the community and feel that more people want to start working on this proactively. There will be a series of articles coming out in the CDA Press including information on CDA Lake water quality issues and what people can do to help. This first one will be released on March 15th which will be a reintroduction to the concept of the Our Gem/CDA Lake Collaborative, and LakeASyst materials as a resource for people in the basin to know what they can do to help.

Rebecca stated the importance for all of us to embrace what is going on right now. The LakeASyst materials that will be rolling out were developed by all regulating agencies involved. These guidance materials on how to be better stewards of the land were not just developed by them. Keep this in mind as they move forward in their call to action.

John said it was interesting to listen to the comments from members on the panels from the Symposium, and it seems there is a heightened awareness and concern with the Lake. He wanted her or Jamie to talk more about their perception of the attitudes from the general public – are they seeing a trend towards more awareness or concern? Jamie answered they are getting an influx of requests for presentations on the data from public groups so they can better understand what is going on. She also added that it is gaining momentum in the public as well. Rebecca stated that the county commissioners went back and shared information with their staff – informing the public thru these different forms and to the leadership in the community is also happening.

Jack wanted to know where the problem was – with the boaters, property owners or who? Rebecca answered collectively we are loving our watershed to death. There is an unbridled growth in Kootenai County in particular and a lot of pressure on our waterways. Jack said not only Kootenai, but Benewah County as well, so what is our answer. Rebecca said be smart boaters and manage yourselves. Jack said maybe there should be information given as they register their boats to what they should and shouldn't be doing.

Phillip said this should be everybody's problem, instead of finger pointing the problem to other people. We all have a role to play in the solution – we need a complete holistic solution to occur if we are going to deal with the nutrients in the basin. What are the potential technologies for stabilizing the pollution in the bottom of the lake, can we stabilize? Maybe it's not so urgent to deal with the non-point source problem of the nutrients pouring into the basin. We need to come up with a different solution to stabilize the sediment in place. Jack said their sediment problem falls back on forest management. They are looking at the practice of clear cuts, setbacks – things that cause the sediment.

Bob Steed from Coeur d'Alene IDEQ stated that they participate in Forest Practices Act (FPA) in the audits they perform and give advice back to an advisory committee who builds the rules for FPA. They are focusing on the cumulative effect of multiple timber sales going on at the same time in the same watersheds. An audit will be conducted this year.

John provided a quick update on the National Academy of Science study the state requested. The NAS has provided a draft proposal that both IDEQ and the Tribe agreed upon, then it was forwarded to EPA to look and see if they felt there were any omissions. All three parties are close to agreeing to the scope of work for submittal back to the NAS. The questions we wanted them to answer are there risks of the lake going anoxic, and if so, help us identify what we need to do to resolve it. We still need to move forward with appropriate measures, but need to understand what is driving the situation in the lake. Hopefully we will get some answers and recommendations as they are highly credible and experts in their field of science. Phillip stated the Tribe does support this NAS study but feels it doesn't need to be re-done. In 2001, NAS did a study that was published in 2005 that would probably be sufficient to move forward with. He wonders where the funding will come from after NAS spends a couple of years on this, especially if they come back with more questions. Let's keep the pressure on and not wait for this study to be completed.

John added that he isn't expecting the NAS study to be the silver bullet, but hopefully they can give us a better idea of the urgency of when or if the lake will go anoxic. He agrees that we need to do what we can to manage nutrient loading now. How we address the problem will be different if it's 5 to 10 years away or 50 years, the study will help in our approach. John thinks the Lake Management Plan has helped us get to this point where we recognize we have concerns. He referenced the LMP section on how trends have reached a trigger level; this will prompt a comprehensive review to identify the causes of the trend and guide development of a corrective management response. He thinks we will get some credible information from the NAS study to help understand the severity and urgency of the problem.

Rebecca – please save the date for the Youth Water Summit happening on May 19th at NIC. They will work with 450 high school students throughout the entire Panhandle, in the field hands on science and research.

IDEQ CDA Regional Office Topics including Point Source Permitting, 303d Listing of Water Bodies for Mercury and SFCDA River WAG – IDEQ

Dan Redline from IDEQ gave an overview on permitting and water quality issues. The State has taken over the Point Source Permitting program, and each year are adding incremental permitting responsibilities. Each region has their own compliance officer – Wes Green is the officer in the Coeur d'Alene office. Previously, EPA would issue permits and IDEQ would certify them thru their 401 Certification Program, now the State builds that whole process into their program. Dan went through several examples of different permitting issues on Lucky Friday, US Silver, SF Sewer District at Page and SF CDA River.

Bob Steed from IDEQ spoke on the studies of mercury concentrations in fish in Idaho, and their additional findings in surrounding lakes (CDA, Harrison slough, Swan Lake, and Thompson Lake). A combined agency effort collected samples and data for fish consumption advisories in 2016, and found those fish did exceed the criteria for mercury. These findings will be added to the 2018-2020 integrated report which will go out for public comment.

John asked if the mercury found was slight or pretty significant amounts, and what impact will it have on the fish consumption recommendations. Bob mentioned that the fish consumption has been modified for CDA, Swan & Thompson Lake, it wasn't a huge exceedance of our criteria but there is not a lot of flexibility for metals. This is a statewide issue not just specific to CDA Lake; a lot of our mercury is airborne in watersheds rather than other sources. John wanted to know how the mercury in fish in CDA Lake compared to other water bodies and Bob answered these three lakes were comparable with each other. Rebecca added a difference on this second effort for the fish advisory, they included the lower river and portion of the Spokane River in Idaho that wasn't included in 2002. They also worked with the Tribe request to sample whole Kokanee. She said the advisory will come out similar to the last one, not a lot of big changes and will be reflected on the revised Our Gem map.

Bob continued – another element is the TMDL's - once they get waters on their 303D list, they are required to put together a Total Maximum Daily Load (TMDL) which is a valuation of how much pollution that water can take and how much reduction would be required to bring it back to full support. The South Fork Watershed Advisory Group was just started – this is a public process of getting input and guidance throughout the development of the TMDL for the SF CDA River. They first will review the sediment TMDL that was already written, and then develop TMDL's for the temperature issues.

Matt Nykiel wondered with the nutrient issue in the lake, and the SF CDA River being one of the primary contributors, would the advisory group be directed to try to come up with solutions for this issue. Dan Redline commented that the North Fork is a bigger contributor – The SF and NF come together to the main CDA River – the CDA River and St. Joe are the big contributors, about 80% of the loading coming from these two rivers. Dan continued that the SF may not have a TMDL driven effort but possibly LMP effort. Bob agreed – they have other plans that protect rather than the TMDL. Matt stated with the Basin being so big, he thinks it will take a coalition of different groups working together on this. Dan Redline agreed that would be ideal.

Phillip asked if IDEQ had a report card that would tell us of the TMDL limited stream segments in North Idaho, how many have been fixed and removed from the list and where do we sit coming into compliance with beneficial uses. Dan Redline said there is a lot of water bodies listed; EPA puts out a success story list on the TMDL program. Most of the successes are in the CDA region and CDA River drainage. There have been several streams delisted off the North Fork area from efforts from the Forest Service and their planning.

Bill Rust, local citizen, talked about the Remedial actions and hopes that EPA will participate in the SFCDA River and its tributaries action to make major improvements in the sediment and temperature TMDL's.

Restoration Partnership Update Including RP BEIPC Work Plan Section for 2020 Philip Cernera, CDA Tribe

Phillip gave an explanation on the Restoration Partnership plans for projects to be implemented in 2020. Some of these projects took quite a bit of time, from getting the final settlement with Hecla to the development of the Restoration Plan. The individuals from the Partnership were asked for project ideas that were shovel, out the door ready. There are 12 - these projects are listed in the packet – some will be quick, others 1-3 year projects. The general public was also asked for ideas, which thru the process, was narrowed down to six – also listed in the packet. Some of these projects deal with reduction of nutrients; others target water quality and fishery resources.

John commented that he was very impressed with the work of the Partnership. There was cooperation from several agencies and a lot of good quality projects came out of this. Phillip added that he hopes for a field trip to show people what we're doing with the remedy activities. They will be coordinating their restoration opportunities with EPA with a meeting on April 20th.

Approve of RP 2020 Work Plan Section as addendum to approved 2020 BEIPC Work Plan (Action Item)

Leslie moved to have the work plan section added, Phillip 2nd - all approved **M/S/C**

Outreach Activities during the last quarter – Terry Harwood; Val Wade, PHD

Val Wade gave an update on outreach activities and the continuation of informing the public about the site history and preventing exposure. Highlights include: handwashing education at area schools; information at Galena mine on how to prevent exposure; job shadowing with student from CDA; preparing for the Environmental Health & Science Fair. She also reported on EPA outreach activities such as the Basin Bulletin and the Reuse Framework report.

Terry spoke on the activities he has been working on – they include: working with the Corp of Egineers and local Flood Group for discussions on flood map revisions; concerns and discussions on the condition of CDA Lake; working with SVTT and paved road program; remedial actions in Nine Mile; and briefings with new congressional representatives.

Brook spoke briefly about Washington's work on the site in Tacoma. She was able to share a lot of useful information from our presentations on Recreational Sites and Blood Lead Screening with the Governor's office in November.

BEIPC/Local Flood Group, COE and FEMA Flood Analysis and Mapping Update – Terry Harwood

Terry presented on the flood analysis and mapping updates for the SFCDA River. Multi agencies have been working to show FEMA the difference current data indicates in hydraulic loadings vs. their flood maps based on a 20002 study. He provided these numbers for both Elizabeth Park and Pinehurst. A summary was provided to FEMA in August 2019, and a conference call concerning this summary took place in November. A final report was supposed to come out in February 2020. Next steps will include preparing and securing funding for a LOMR request so that it can be submitted to FEMA for action. A levy upgrade in the vicinity of the Bunker Avenue Bridge will also need funding.

Central Treatment Plant/Ground Water Collection System Update – Ed Moreen, EPA

Ed gave a presentation on the CTP/GWCS upgrade – many times he has presented on planning, design and their procurement process; they are now in the testing mode. This project was started in 2012 and is one of the major success stories. The intercept wall that was constructed for ground water collection still has three gaps that will need to be filled in the next couple months. Wells that are in place will pump the ground water to the upgraded CTP. All of the flow that is treated now comes from the Bunker Hill acid mine drainage. This was an Operate/Design/Build contract which means they still had to operate the CTP, while they designed the new plant, ground water system, new sludge impoundment and the wells. Ed explained and showed the differences on how the plant looked and the changes made through a series of slides, to how it looks now. Phillip asked if the lime used was powder form or liquid and Ed said it is prelled lime that mixes with the mine water to create slurry. Terry and Ed both commented that the concrete for the 30ft tall reactor was a monolithic pour, so to not have any cold joints, no water leaking out. Some of the old buildings will still be used with new equipment and upgrades installed. Ed explained all the testing that is currently being conducted; everything is up and running on the new system except the filters which have not been tested yet. They are only treating mine water at this time and will incorporate the ground water collection system flow.

Rebecca was curious as to where they would be testing and monitoring the phosphorus they had previously talked about – and Ed answered that testing is happening at both the influent and effluent locations for metals. Dan Redline asked if the filters were in parallel or series in which Ed answered parallel – 6 of 7 operating at any one time to treat the entire flow. John wondered what the filter media is and Ed said multi-media which will be sand based with other medium. Mike McCurdy wanted to know how many gallons a day they would be treating with the ground water wells – Ed said the CTP is sized to treat full flows at 5,000 gpm (gallons per minute), base flow from the mine about 1,300 gpm, and estimated flows from the GWCS will be about 2,000 gpm; when the CTP goes through optimization, the flow rate could be adjusted as necessary. Joe from the Sewer District wondered if they would be changing the static water level during the summer around the GWCS wall, he's concerned about the sewer line there, would the level be

lowered – Ed explained that since there are still gaps in the wall and no pumps running yet, they will want to maintain an optimum water level when the gaps are closed – will remain to be seen. Joe also wanted to know if they would have a published discharge permit they can view – Ed stated they went thru a technical evaluation of compliance with all parties concerned and would be happy to share this information. Another question came up - if the State would eventually regulate the discharge from this plant – Ed said the plan is to transfer the CTP to IDEQ – they will eventually be the plant owner and operator. Jamie Sturgess asked if the chemistries were similar within all the wells - Ed answered yes, high zinc levels. Rebecca wanted to know if this was the first of its kind in a Superfund site where you see a bentonite wall with its length and depth adjacent to a historic tailings pile – and he answered that a cutoff wall was not unique in Superfund remedies, not sure how it measured up to other sites. Ed added the unique thing about it is there is 26 million cubic yards of waste built in a river floodplain that continues to bleed.

Discussion on BEIPC Meetings and Tour for 2020 – Terry Harwood

Terry opened up a discussion to get the public's input on what they might like to see on the tour this year; give the people an idea on how much work has been done and what's left to do. Brook appreciates seeing the scope and scale in the Basin but would like to see more of the Lower Basin work and Restoration projects. Terry asked if there was enough to see and Rebecca answered not yet; a lot of them are still in the permit & design phases and would not warrant a tour. Brook clarified and suggested looking at some non-point issues that we keep talking about, what is working and what isn't. Ed suggested that we could take a walkthrough the Treatment Plant as it will be up and going by August; since we haven't been able to do so due to construction. Terry will discuss more with staff and come to a decision.

CCC and Public Input Session and Discussion – Jerry Boyd, CCC Chair

Jerry is absent at today's meeting so he asked Terry to present on his behalf. He would like to have a CCC meeting in April in the Lower Basin; he was encouraged at the Lower Basin Project Focus Team meeting that was held last week. Projects discussed were the Wetland Conversion Project; pilot project at Dudley Reach; and working with the Recreation Project Focus Team on recreational spots along the river.

Citizen Input and Discussion

Mac went on the on record to say that communications with all agencies involved is going good – the process to go over issues and problems are getting resolved – for the City of Kellogg and the other mayors in the coalition, and are making things work together.

Josef Dregg, a citizen and veteran, voiced his concerns – always told to fish the North Fork of the CDA River and not the main body. Terry stated that the fish advisories are out there – Dana said on the Idaho H&W website – you can still fish on the South Fork, just follow the guidelines.

Ed made a motion to adjourn the meeting, Brook 2nd, all approved **M/S/C**

DRAFT

BASIN COMMISSION (BEIPC)

2021

ANNUAL WORK PLAN

10/29/2020 Draft BEIPC Coeur d'Alene Basin Calendar Year 2021 Work Plan

INTRODUCTION

This plan covers proposed environmental cleanup and improvement activities in the Coeur d'Alene Basin scheduled for 2021 by the Basin Environmental Improvement Project Commission (BEIPC) and coordinating agencies and governments 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 2021 - 2025 Five Year Work Plan. This plan has been prepared by the Executive Director working with the coordinating agencies and governments with review, input and approval by the Technical Leadership Group (TLG) and review and input from the Citizen Coordinating Council (CCC). The work plan is organized as follows:

> Part 1 – Environmental cleanup work performed through the federal Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) by the Environmental Protection Agency (EPA) and State of Idaho through the Idaho Department of Environmental Quality (IDEQ) or work performed by the Coeur d' Alene Work Trust (Trust) and Potentially Responsible Parties (PRP).
>
> Part 2 - Other 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 (RODA) for OU-2 and 3.

Part 2 includes work and responsibilities concerning management of Coeur d'Alene Lake by the Coeur d'Alene Tribe and State of Idaho, restoration of natural resources by the Natural Resource Trustees (Restoration Partnership) and work the BEIPC has assumed based on recommendations from the National Academy of Sciences (NAS) 2005 Study and requests from 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. It may not address all work items noted in the five-year plan because some will not be initiated until later years.

PART 1 – ENVIRONMENTAL CLEANUP WORK

For Part 1, the scope of the proposed work corresponds to the source and level of funding anticipated for 2021 and work anticipated to be performed by the responsible parties. The proposal includes the following work:

- Human Health Issues including Residential and Community Property and Private Water Supply Remediation, Basin Property Remediation Program (BPRP); Paved Road Remediation Program; Lead Health Intervention Program (LHIP); and Recreation Use Activities.
- Repository and Waste Consolidation Area (WCA) Development and Management
- Remedial actions in the Upper Basin including source control actions, water treatment, and related human health activities provided for in the Upper Basin RODA.
- Remedial actions and/or Pilot Projects in the Lower Basin.
- Basin Environmental Monitoring Program
- Operation and Maintenance Responsibilities for Remedial Actions

1.1 HUMAN HEALTH ISSUES

Remediation in areas where human health exposures exists is a remedial action priority as defined in the OU-3 ROD. It includes maintaining the Institutional Controls Program (ICP) managed by the Panhandle Health District (PHD) and conducting cleanup in residential, community and recreational areas in the Upper and Lower Basin and the Paved Road Remediation Program. The RODA addresses source control remedies, water treatment remedies, and ecological cleanup projects with related human health activities.

1.1.1 Residential and Commercial Property Remediation

During 2020, the Trust's Basin Property Remediation Program (BPRP) remediated eight properties and sampled five including residential and commercial properties, rights-of way, and private drinking water sources. Properties remaining to be sampled and/or remediated in the Upper and Lower Basin are those whose owners have refused access or have been unresponsive to repeated contact attempts by the Trust and IDEQ.

The goal for 2021 is to complete sampling and remediation if sampling results are above actions levels on parcels whose owners have granted access. Currently, about 213 properties in the Upper and Lower Basin require sampling and 40 properties require remediation based on previous sampling. A total of 3925 properties in the Basin and 3236 properties in the Box have been remediated at the conclusion of 2020. Eight properties in the Box remain to be remediated once owners grant access.

In 2021, EPA will continue to direct and oversee the Trust's BPRP work. IDEQ will continue an oversight and coordination role initiated in 2015 and will continue to encourage property owner hold outs to have their properties sampled and remediated, if necessary.

1.1.2 Paved Roadway Surface Remediation Program

The BEIPC, EPA, and IDEQ developed a Roadway Surface Remediation Strategy in 2012 in recognition of road damage caused by heavy truck traffic during remediation work and potential ongoing risk posed by deterioration of paved roads in remediated areas. The purpose of the program was to address the deterioration of paved road surfaces that were underlain by contamination. Work was implemented to ensure paved road surfaces continue to serve as barriers that reduce or eliminate exposures to contamination with the local jurisdictions maintaining their responsibility for operation and maintenance of those surfaces. There were 593 segments to be remediated in the original strategy. The EPA/IDEQ Roads Board added 13 segments that were found to meet the criteria for remediation under the program resulting in 606 segments on the current eligible list. The local road jurisdictions were responsible for implementing the program and continuing operations and maintenance of the paved road segments as barriers. Work under this program was carried out by the local road jurisdictions with federal grants funded through IDEQ and funding from the Coeur d'Alene Trust.

As of the end of the 2020 construction season, Kellogg, Wardner, Smelterville, Eastside Highway District, Pinehurst, Osburn, Wallace, Mullan and Shoshone County Box have completed all of their eligible segments in the Program. Shoshone County completed 35 road segments in 2020 with the last of the Basin remaining program funds. All jurisdictions have now completed their list of approved projects or spent their funding allocation for the program. The Paved Roads Board will prepare a final Remedial Action Report in 2021 to close out the program work.

1.1.3 Lead Health Intervention Program (LHIP)

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

In early 2012, the Centers for Disease Control & Prevention (CDC) changed its "level of concern" associated with childhood lead poisoning from a blood lead level of 10 micrograms per deciliter (µg/dl) to a new "reference value" of 5µg/dl. The new lower value means that more children will be identified as having lead exposure allowing parents, doctors, public health officials, and communities to act earlier to reduce the child's future exposure to lead.

Panhandle Health District (PHD) will continue to offer free blood lead screening for residents living within the Bunker Hill Superfund Site boundaries. In addition, PHD will be conducting its annual summer screening with a $40 incentive for children between ages 6 months to 6 years of age residing within the Basin for 2021.

When an individual is identified with an elevated blood lead, it is recommended their physician be notified and Panhandle Health District will make an appointment for a home visit to identify potential sources of exposure in and around the home. These in-home consultations help PHD and individual families identify ways to reduce exposure risks. In addition, PHD can help identify potential exposure pathways the cleanup project can address to prevent lead exposures.

Additional Services offered by PHD's LHIP:

- Year-round blood lead screening and free follow-ups
- HEPA vacuum loan program for cleaning residences
- Education, outreach, and awareness for parents, children, community members, recreationalists, and visitors
- Education classes in local school's grades K-12
- Annual Environmental Science and Health Fair
- Education and outreach at community events
- Sampling of soil, dust, paint, water, and other media as appropriate [1]

1.1.4 Recreation Use Activities

In 2016, a Recreation Sites Program was created to address and manage human health risks from exposure to lead and other metals that can occur during recreation activities throughout the Upper and Lower Coeur d'Alene Basin. A strategy document was developed to lay out goals, ways to inventory recreation areas, possible ways to manage risks to people, and current outreach activities. This strategy was issued for public and stakeholder comments and suggestions. The strategy and response to community input are available at: **www.deq.idaho.gov/playclean**.

[1] All in-person and in-home services will be conducted in compliance with COVID-associated protocols.

Addressing contamination at recreation sites is different than other cleanup activities. Many places are re-contaminated with each high water or flood event making it difficult to just remove contaminated soil and replace it with clean soil.
Other recreation areas are remote, hard to access, and spread out, like hiking trails or ATV areas, making cleanup of the entire area difficult. Overall, different approaches are needed for the various types and locations of recreation sites. In addition, community outreach and education are important ways to help people manage health risks while recreating. An outreach and education program has been in place for years and will continue to be implemented and expanded.

During 2021, the Recreation Sites Program, which includes EPA, IDEQ, PHD, CDA Tribe, BEIPC and the CDA Trust, will meet at least biannually to evaluate and discuss priorities. In the Basin, the CDA Trust expects to start cleanup at the Cataldo Boat Ramp, sample other Upper and Lower Basin areas that are known to have high usage by young children, continue to update and install new signage at identified recreation sites, and continue the temporary hand wash station installation at select boat ramps. In the Box, IDEQ and PHD will continue to update signage and evaluate access controls at mine and recreation sites where public use has been identified. Recreation sites that were sampled last year will receive signage, as necessary, and removal of material waste piles found in unrestricted areas will be coordinated. Planning for further remediation at the sampled recreation sites will continue. The overall goal is to address and manage human health risks from exposure to lead and other metals while maintaining the benefits of recreation for people's health and the local economy.

1.2 REPOSITORY AND WASTE CONSOLODATION AREA (WCA) DEVELOPMENT AND MANAGEMENT

Repository Background

There are currently three operating repositories within OU-3; Big Creek Repository (BCR), which includes the Big Creek Repository Annex (BCRA), East Mission Flats Repository (EMFR) and Lower Burke Canyon Repository (LBCR). The Page Repository provides for disposal of remedial and ICP wastes in the Box (OU1 and OU2). Between 2015 and 2019, four Limited Use Repositories (LURs) were developed, filled to capacity with relatively inert asphalt, concrete, and road base material generated during the Paved Road Program and closed. With all outstanding Paved Roads Program projects completed in 2020 it is not likely that future LURs will be developed.

Repository development and management is an ongoing process that must meet the demand for disposal of historic mining related contamination for the Basin environmental and human health related cleanup program. This includes the BPRP and other cleanup actions performed by IDEQ, EPA, and the Trust. It also includes waste generated by private parties and local government agencies under the ICP.

BCR is located at the mouth of Big Creek Canyon and primarily serves the Upper Basin. The BCR has received waste since 2002. The BCR has undergone expansions in 2009 (200,000 cy), 2011 (126,000 cy), and 2017 (127,000 cy) increasing its waste holding capacity. BCR currently has a remaining capacity for approximately 95,000 cy. BCRA was constructed in 2015 and is located adjacent to the original BCR, just southwest of the original site on the west side of Big Creek. BCRA uses the existing BCR access, decontamination, and ICP staging facilities. The initial design waste capacity of BCRA was approximately 190,000 cy and has approximately 173,000 cy remaining.

EMFR is located north of Interstate 90 off Exit 39, near Cataldo, and primarily serves the Lower Basin. EMFR has been receiving waste since 2009. The EMFR was designed with a waste capacity of approximately 410,000 cy. At the current and estimated future waste disposal rates the EMFR is

estimated to reach the design capacity in approximately 30 years. EMFR has approximately 166,000 cy of volume remaining.

LBCR is located in Burke Canyon on the Star Tailings Impoundment near the community of Woodland Park. The Trust completed the LBCR design and construction in 2015. The remaining capacity at LBCR is about 1,050,000 cy.

The Page Repository is located in the Box just west of Smelterville. Having reached its previous design capacity in 2010, Page is being expanded westward to provide capacity for an additional 700,000 cy of waste. Because of the use of LURs to dispose of paved road wastes from the Box Paved Roads Program, the service life of the Page West Expansion was likely extended by 10 years, for a total life expectancy of about 45 years. Page will continue to receive Box remedial action and ICP waste in 2021.

Repository Objectives

The Repository Work Plan focuses on the following objectives:

(1) Box repository operations
(2) Continued development of Box repository capacity to support remedial action projects in the near term and sustain ICP support in-perpetuity
(3) Operating BCR, BCRA, EMFR, and LBCR
(4) Increasing repository volume in the Upper Basin
(5) Managing the Waste Management Strategy (WMS) including considerations for waste reduction or consolidation.

Specific tasks to achieve these objectives are summarized below:

Box Repository Operations

Page Repository operations will include but are not limited to the following tasks:

- Receipt and placement of ICP and remedial action waste
- Segregation and appropriate re-use or disposal of non-soil waste such as wood and root wads, concrete, asphalt, large (greater than 6 inch) rock fragments and miscellaneous demolition debris.
- Equipment decontamination, site stabilization, erosion and sediment control installation.
- Surface and ground water monitoring and associated reporting.
- Waste stream management to minimize disposal and maximize re-use of high-volume waste materials.

Increasing Box Repository Capacity

2021 work will include placement of concrete debris to continue construction of starter berms and foundation mattress in the Page expansion cells. Geotechnical monitoring equipment will be installed in the new expansion cells.

Basin Repository Operations

In 2021, Basin repositories will be operated to accept waste from some minor remedial actions, the BPRP and ICP. There is significant uncertainty in waste volume projections for infrastructure (ICP) waste. However, Basin repositories are estimated to potentially receive as much as 25,500 cy from all

projects in the Basin. Anticipating those needs, the Basin repository operations include but are not limited to the following tasks:

- Receipt and placement of some minor remedial action waste, the BPRP and ICP.
- Segregation and appropriate re-use or disposal of non-soil waste such as wood and root wads, concrete, asphalt, large (greater than 6 inch) rock fragments and miscellaneous demolition debris.
- Equipment decontamination, site stabilization, erosion and sediment control installation.
- Surface and ground water monitoring and associated reporting.

WCA Development and Operations

Development of the East Fork Ninemile WCA began in 2013. This WCA is being developed to consolidate mine waste materials, including waste rock and tailings, from cleanup activities throughout the Ninemile Basin. Wastes from the completed Interstate-Callahan Mine/Rock Dumps and the Success Complex cleanups have already been placed and consolidated at this site, as well as wastes from the Interstate Mill Complex cleanup.

The EFNM WCA will require expansion following the placement of the remaining Interstate Mill Site cleanup wastes to provide capacity for the waste from the other Ninemile Basin source sites (i.e., Tamarack Complex, Dayrock Complex, and a portion of the lower EFNM Creek riparian area). This expansion was started in 2020.

Increasing Upper Basin Repository and WCA Capacity

Increasing Basin long-term repository and WCA capacity will be needed to dispose of the waste material generated by the cleanups identified in the OU-3 ROD and the Upper Basin RODA. The Upper Basin RODA adopted a two-part approach to waste management that utilizes both the WCAs and repositories

A repository siting process, with community input, was developed in 2009 to identify new repository sites to support cleanup activities in the Upper Basin. Based on this process, the LBCR was developed and began receiving waste materials in 2015. Baseline site characterization data was collected, and a 30% design was completed in 2011 at Osburn Tailings Impoundment (OTI) area. Considering remedial project planning, as described in the RODA, and with close coordination with Hecla Mining Company, activities at the Star Mine Complex in Burke and the OTI design were put on hold to focus on the more immediate needs for repository capacity in Canyon Creek Drainage. In 2015 the Trust began evaluating and collecting data to determine how to mitigate contaminated springs discharging from the base of the existing Silver Valley Natural Resource Trustee (SVNRT) Repository in Canyon Creek. In 2019 construction began on the Canyon Complex Repository CCR/WCA, which will receive waste material from Canyon Creek Drainage remedial actions and the material moved from the SVNRT repository site eliminating the contaminated springs discharge. Originally, the intent was to rebuild the SVNRT repository or treat the springs discharge, but with the construction of the CCR/WCA, SVNRT material will be moved to the CCR/WCA eliminating the need for repository rework while providing correctly engineered containment. The CCR/WCA is designed to accommodate, 1,500,000 cy in addition to the transferred volume of the SVNRT Repository.

Lower Basin WCA Development

During 2020, EPA began seeking public opinion for WCAs siting considerations in the Lower Basin. Remedial work is being planned for cleanup of contaminated areas in the Lower Basin, however project designs have not been currently developed. It is anticipated that WCAs in the Lower Basin will be located in close proximity to future project sites if possible.

The repository and WCA design programs are dynamic processes driven by many factors, including waste stream volume estimates, priority cleanup site locations, funding availability and operating mine activities. As cleanup implementation plans are finalized and waste stream volume generation schedules are developed, repository and WCA designs, technical evaluations, and needed property acquisition will proceed at the sites identified through the public planning process.

Waste Management Strategy (WMS) Update

The WMS is a key document that guides repository and WCA siting and waste disposal or re-use. It contains the most current estimates of future waste volumes and implementation schedule forecasts within geographic areas. The WMS is updated, as needed, to incorporate additional information regarding the projected waste volumes generated by OU-2 and OU-3 remedial activity and remaining repository and WCA capacities. The WMS was developed and is amended by EPA and the Trust in coordination with IDEQ and PHD. The Technical Leadership Group and/or the Repository Project Focus Team (PFT) also are involved during key planning intervals.

1.3 ENVIRONMENTAL REMEDIATION ACTIONS

Environmental remediation actions include work in the Upper Basin described in the RODA and work in the Lower Basin described in the OU-3 ROD.

1.3.1 Upper Basin Remedies

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

The Upper Basin RODA identified $635 million dollars of work in the Upper Basin including potential work at 125 mine and mill sites. The 2016 EPA Superfund Cleanup Implementation Plan (SCIP) identifies the priority setting process and outlook for sequencing the work over the next ten years. This document is updated at a minimum of every 5 years, as part of the adaptive management process to incorporate lessons learned as the work moves forward. Additional information about the RODA and prioritization of cleanup actions including technical memos, meeting presentations, and community involvement documents are located at the following web site:
https://www.epa.gov/superfund/bunker-hill

The goals of the RODA include:

- Prioritizing Upper Basin/Box source areas for cleanup to improve water quality and address risks to human health and the environment
- Moving forward on the OU-2 Phase 2 cleanup to improve water quality in the SFCDAR
- Addressing changes in water treatment to accommodate additional contaminated water
- Focusing on source control actions that address particulate lead which poses a risk to human health and ecological receptors, and

- Protecting remedies in community areas from tributary flooding and heavy precipitation events (the construction portion of this work was finalized at the close of 2019 with completion of the Remedy Protection Program).

The prioritized cleanups under the RODA 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 CDA River and downstream areas as a result of this work. These actions in turn are expected to reduce the recontamination potential in the Lower Basin and other downstream areas and reduce risks to humans and wildlife from exposure to contaminated mine waste.

This BEIPC 2021 work plan focuses on those cleanup actions that have either already started or been planned for the coming year. The following is expected to be the focus of the Trust in the Upper Basin during 2021:

East Fork Ninemile Basin

Tamarack Complex Design and Cleanup: The prioritization of the Tamarack Complex cleanup is based on metals loading, accessibility to the public, impacts to adjacent roadways, and the upstream location of the sites relative to other source sites in Ninemile Basin. The design of the Tamarack Complex will be completed in 2021, cleanup is expected to begin in 2022.

East Fork Ninemile Waste Consolidation Area: Developed in 2013, the EFNM Waste Consolidation Area (WCA) provides a location to consolidate mine waste materials, including waste rock and tailings, from cleanup activities throughout the Ninemile Basin. Wastes from the completed Interstate-Callahan Mine/Rock Dumps, Success and Interstate Millsite cleanups have already been placed and consolidated at this site.

The EFNM WCA will continue to receive wastes until the remedial actions have been completed for the EFNM, estimated to be 2024.

East Fork Ninemile Creek Riparian Area:
Cleanup of the East Fork Ninemile (EFNM) Creek riparian area is divided into Upper and Lower EFNM. Remediation of the upper section of EFNM Creek will begin in 2021 and be completed in 2021. The design for Lower EFNM will be combined with the Dayrock Complex design and is planned for completion in 2021. Construction of the Dayrock Complex/Lower EFNM Creek section is scheduled to begin in 2022.

Canyon Creek Basin

SVNRT Repository Remediation and Canyon Complex Repository/Waste Consolidation Area: Similar to the EFNM WCA, the Canyon Complex Repository (CCR)/WCA is being constructed to receive and consolidate wastes from the numerous source areas that will be cleaned up in the Canyon Creek Basin. Construction of the CCR/WCA began in 2019 and will continue in 2021. As part of this work, mine waste from the old SVNRT repository will be moved into the new repository in 2021. The facility will be ready to take mine waste from other cleanup sites in the Canyon Creek area in 2023.

Canyon Creek Quarry: As part of the construction activities at the CCR/WCA, the Trust purchased a 23-acre parcel that is used as a source of uncontaminated rock and gravel to use as clean fill materials. This quarry property is located 2.7 miles east of CCR/WCA. In 2021, work will continue at the Quarry to produce uncontaminated rock and gravel fill for future use at the CCR/WCA.

Data Characterization and Evaluation: In 2021, the Trust will evaluate data collected during characterization work at the Hecla Star Mine Complex and Tamarack #7. The Hecla Star Mine Complex design is expected to be finish in 2021. Design activities for the Tamarack #7 will begin in 2021.

Canyon Creek Design Investigations: Flynn Mine and Black Bear Fraction design investigation will continue in 2021. Design investigations will begin at Standard-Mammoth Reach Complex and the Gem Complex. Additionally, the Trust will perform preliminary investigation at four other mine and mill sites in the Canyon Creek Basin including the Ajax #3, Canyon Creek Garbage Dump, Marsh Mine, and Oneill Gulch Unnamed Rock Dump.

Pine Creek Basin

Douglas Mine and Mill: The Trust began characterization of the Douglas Mine and Mill site in 2019 and continued characterization in 2020. Characterization and remedial design will proceed in 2021 with anticipated cleanup beginning in 2022.

Central Treatment Plant/Central Impoundment Area

Work under the Corps of Engineers Design/Build/Operate Contract to AMEC/Foster Wheeler (now Wood) is nearing completion and transitioning to Operations and Maintenance mode. Wood continues to be responsible for the continued operation of the existing Central Treatment Plant (CTP) and the new Groundwater Collection System (GCS) in Kellogg and has completed both the design and construction of upgrades to the CTP along with the new GCS. The Corps of Engineers is responsible for administration and management of this contract.

The CTP upgrades were necessary to treat additional influent flow from the GCS, improve system reliability, meet current, more stringent discharge requirements, and to operate in High-Density Sludge (HDS) mode. These upgrades were necessary for some time to provide dependable and more efficient water treatment of the Bunker Hill Mine discharge water and the groundwater to be collected from the GCS near the Central Impoundment Area (CIA). The Bunker Hill Mine water has been and continues to be treated at the CTP. The upgraded CTP was designed to treat influent flows at rates that nearly triple the current rate of base flows from the Bunker Hill Mine. Excess flow from the Bunker Hill Mine will be diverted to in-mine storage. The old plant was not capable of meeting discharge standards when operated in HDS mode; the newly upgraded plant when operating in HDS mode will result in much less sludge production, more efficient operating conditions, and the need for fewer sludge ponds being constructed over time.
Following treatment, the effluent (combined mine water and extracted groundwater) discharged from the CTP to the SFCDAR will be required to be in compliance with current water quality standards. On an average basis, the GCS is expected to result in significant removal of dissolved metals, the most notable of which is zinc that is currently being discharged to the SFCDAR from groundwater interaction, as discussed in the following paragraph.

The GCS project includes an approximate 8,000-linear feet cutoff wall between the CIA and Interstate 90 (I-90), a series of extraction wells, and a conveyance pipeline to the CTP that extends along the north side and over the top of the CIA. Groundwater flow and strength (concentration of metals) varies from base flow/strength (late summer/winter) through maximum flow/strength (spring runoff). By considering seasonal and annual variability and groundwater monitoring well data from south of I-90, the estimated dissolved zinc loading to the gaining reach of the SFCDAR ranges from 150 to 450 pounds per day (lbs/day). A significant unknown is the potential source of metals in tailings under and

north of I-90 that will not be captured by the groundwater collection system. However, the optimistic target is to capture up to 90% of the predicted load to this gaining reach from south of I-90.

In 2020, the 3 gaps in the slurry wall were closed and the wall capping was completed. Additionally, the contractor has been focusing on site grading, cleanup and punch list items. Wood has been running both the GCS and the CTP system through a series of construction, acceptance and integrated tests and is expected to be completed before the end of the calendar year 2020. Due to the timing of the system completion a high strength/high flow test is expected to be run through the CTP during high flows in the spring of 2021. System operators received training during 2020 and are operating the new system. The 1-year O&M period beginning October 2020 was shifted from May 2020 due to delays caused by COVID-19 and seasonal constraints associated with contract issuance.

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, river bed dredging, and cleanup at identified recreational areas along the Coeur d'Alene River. Objectives of remediation in the Lower Basin focus on reducing human exposure to lead-contaminated soils and sediments, improving water quality and reducing particulate lead and other heavy metals in the Basin ecosystem.

In 2019, the working sediment transport model was modified as a result of review and input from the Peer Advisory Team and the output from those revisions was documented in the model development report. EPA used the model to characterize baseline conditions in the Lower Basin and simulate the impacts of typical and extreme floods as well as changes to the system over a five-year and 30-year period. EPA continues to use the model to evaluate specific technologies and combined approaches for remediating the riverbed. This will inform a management plan that targets areas for active remediation, evaluates the effects of remedial technologies, and identifies areas for natural recovery. The results of these efforts continue to be shared with the subgroups of the BEIPC (e.g. Lower Basin PFT (LBPFT), TLG and CCC), interested stakeholders, and citizen groups.

Informed by the Lower Basin Project Selection Process, EPA will continue to coordinate with the Restoration Partnership in 2021 to advance design on IDFG-owned Gray's Meadow to create clean waterfowl feeding habitat at one of the habitat areas that scored well using the multiple objective decision analysis process. To address contaminated sediment transport in the CDA River channel, EPA will continue working with the LBPFT to finalize the approach for selection of pilot projects in early 2021for implementation in the Dudley Reach, which is considered the most significant upstream lead loading segment in the River.
Several technologies including capping, dredging, splays, and riverbed weirs have been evaluated for feasibility, cost and remedy effectiveness. The Trust will initiate planning and remedial data collection efforts in 2021 for the Dudley Reach Pilot Project focusing on multiple technologies as a test of constructability and performance in limited segments. Several recreation areas will be considered by the recreation subgroup to address lead exposure associated with recreating along the river channel as it is an ongoing concern, as discussed in the Recreation Use Activities Section.

Additional investigation in the channel and the floodplains will be used to inform the conceptual design and feasibility of specific pilot projects that are being considered for implementation over the next two to five years. In 2021, maintenance and monitoring will continue at the Incremental Thin-Layer Capping site at Lane Marsh and bench testing of soil amendments will be completed using native soil collected from the marsh. The need for waste disposal and capacity will be evaluated in 2021 to serve potential, future lower basin remediation and pilot project implementation.

This work in the Lower Basin will be accomplished while continued cleanup focuses on human health and addressing source stabilization in the Upper Basin. The Upper Basin cleanup is expected to compliment cleanup activities in the Lower Basin by reducing the loading of contaminated materials to the watershed and reducing the potential for recontamination from the Upper Basin to the Lower Basin.

1.4 BASIN ENVIRONMENTAL MONITORING

EPA has continued to optimize and restructure the Basin Environmental Monitoring Program (BEMP) updating data quality objectives and Quality Assurance Project Plans (QAPPs) to better meet both remedial action effectiveness and long term monitoring needs of the cleanup. For over ten years, EPA has implemented the Basin Environmental Monitoring Program (BEMP) to meet the following 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.

A comprehensive summary of data collected through the BEMP will be included in the 2020 Five Year Review. This includes a summary of the USGS e document: Trends in Concentrations, Loads and Sources of Trace Metals and Nutrients in the Spokane River Watershed, Northern Idaho, Water Years 1990-2018 (Zinsser, 2020), which is posted on the USGS publications website (https://pubs.er.usgs.gov/publication/sir20205096). This report analyzes long-term water-quality and streamflow data, collected by the USGS at 20 sampling sites in the Coeur d'Alene, Spokane and St Joe River watersheds to evaluate the impact of remedial actions on metals in surface water. Analyses focused on total and dissolved cadmium, zinc and lead. Trends in total phosphorus, total nitrogen and dissolved orthophosphate were also evaluated; although these nutrients are not constituents of concern for the Superfund site, they are important to the health of Coeur d'Alene Lake. Annual USGS surface water sampling results for 2019 are summarized in the following report, available on the EPA Webpage: Coeur d'Alene Basin Environmental Monitoring Program – Surface Water, Annual Data Summary – Water Year 2019: https://semspub.epa.gov/src/collection/10/SC39274.

In 2020, EPA updated the Basin Environmental Monitoring Plan to guide the collection, analysis, and interpretation of environmental data while providing flexibility for adaptive management as remediation work is completed and information regarding site conditions evolves (Maul Foster & Alongi [MFA], 2020).

The updated and revised BEMP is structured into three geographically based tiers:

- Site-specific remedial action (RA) effectiveness and performance monitoring
- Area-wide monitoring focused on geographically related areas and typically encompassing multiple RA sites (e.g., watersheds)
- Bunker Hill site-wide and long-term monitoring with a focus on surface water throughout the entire site.

The updated BEMP incorporates the site wide Program Quality Management Plan that was finalized in 2015 and a Site-wide Data Management Plan (scheduled for completion in 2021). The updated BEMP

and the Area-wide Remedial Action Effectiveness Monitoring Plan for Ninemile Basin were distributed for broader review in October 2020.

Construction of the GCS adjacent to the CIA in Kellogg, was completed in 2020. Preliminary data for RA Effectiveness Monitoring for the GCS will be collected during baseflow conditions in fall 2020 following closure of gaps in the bentonite slurry wall and initial aquifer testing that occurred during the summer. As part of the BEMP surface water monitoring network, the USGS collects discharge and water-quality samples from two stations located at Kellogg and Smelterville on the SFCDAR above and below the GCS. For a limited period following construction and optimization, additional groundwater and surface water samples will be collected more frequently to ascertain the overall efficacy of the GCS. Additionally, the USGS conducted a baseline seepage investigation in August 2017 (prior to construction) to more accurately define the distribution of groundwater seepage to the SFCDAR in the reach between Kellogg and Smelterville, and to quantify the metal loading from both groundwater and surface water along the reach adjacent to the CIA. The information gained from this investigation will be compared to a similar study to be conducted in 2022 with the GCS in place.

RA Effectiveness monitoring has been ongoing in Ninemile Creek Drainage since 2012 to establish baseline conditions, help prioritize work, and assess the effect of source area cleanups. The source areas in EFNM Creek continue to contribute, in aggregate, the largest lead and zinc loads to Ninemile Creek. Four remedial actions (RAs) will have been completed by the end of 2020: IC Rock Dumps, Rex Complex, Success Complex, and Interstate Millsite. The remainder of the priority Ninemile RAs are the Tamarack Complex (potentially 2022 through 2024), lower portion of EFNM Creek riparian area, and the Dayrock Complex (2022 through 2024). A portion of lower EFNM riparian area extending downstream from the Success Complex site approximately 1,400 feet will be addressed in 2021.

EPA continues to make available the analytical results from historic data through 2015 via WQX, EPA's Water Quality Exchange. Human health-related residential data is not included in this database. Data management for the Bunker Hill Site is transitioning to Scribe.net, an EPA data management system that will be administered by Bunker Hill stakeholders including EPA, IDEQ, and the Trust with support from the EPA Environmental Response Team. Both WQX and Scribe.net databases include site surface water, soil, sediment, groundwater and biological resource sampling data. During this transition period, site-specific data requests should be directed to the EPA RPM Jennifer Crawford (crawford.jennifer@epa.gov).

1.5 OPERATION AND MAINTENANCE RESPONSIBILITIES FOR REMEDIAL ACTIONS

CERCLA prohibits EPA from use of funds from the Superfund Account on operation and maintenance (O&M) of remedies. The entity responsible for O&M on completed and accepted remedial work may vary. In general, O&M on EPA selected cleanup actions will be performed by the Trust; the State of Idaho; local governmental jurisdictions or parties who are required to perform O&M activities by judicial or administrative settlement, environmental covenants/conservation easements or the Institutional Control Program.

PART 2 – OTHER ACTIVITIES AND RESPONSIBILITIES

For Part 2, the scope of this work plan recognizes a number of work items that the BEIPC will be involved in and items of work needed to accommodate some of the recommendations of the 2005 NAS study; BEIPC and agency communications and public involvement activities; State of Washington activities; implementation of the Lake Management Plan by the State of Idaho and CDA Tribe and coordination with activities of the Natural Resource Trustees (Restoration Partnership).

The plan includes the following work:

- IDEQ Lake Management Activities
- Coeur d'Alene Tribe Lake Activities
- Flood Control, and Infrastructure Revitalization
- Communications and Public Involvement
- State of Washington Activities
- Coordination with the Restoration Partnership

2.1 IDEQ LAKE MANAGEMENT ACTIVITIES

The OU-3 Interim ROD did not include CDA Lake in the Selected Remedy. 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. The Upper Basin RODA indicated that a remedy for Lake bed contamination has been deferred contingent on successful management through the LMP. The LMP's goal is to manage metals in contaminated Lake bed sediments through a nutrient management plan as well as outreach and education with property owners related to potential impacts of contaminated sediments on water quality in the Lake.

As of the summer of 2018, the Coeur d'Alene Tribe asserted that the LMP is inadequate, in itself, as an effective tool to protecting water quality in the Lake and has been in discussions with the IDEQ and the EPA to determine what additional mechanisms/actions are needed to manage the hazardous substances in the lake bed sediments. The State of Idaho has initiated a third-party review of lake management data by the National Academy of Sciences (NAS) to help inform an appropriate response to undesirable water quality trends. IDEQ staff continues to operate under the LMP as discussions with the Tribe and EPA continue and the third-party review commences and progresses. This work plan includes activities planned for implementation by IDEQ staff.

Below are the objectives outlined in Section 3 of the LMP: These objectives are listed in the order they appear in the LMP, which does not necessarily reflect any prioritization.

1. Improve Scientific Understanding of Lake Conditions through Monitoring, Modeling, and Special Studies. Comment from IDEQ and Tribal staff: This objective is needed to ensure management actions are effective and efficient, providing a data-driven adaptive management approach.
2. Establish and Strengthen Partnerships to Maximize Benefits of Actions under Existing Regulatory Frameworks.
3. Finalize and Implement a Nutrient Reduction Action Plan. Comment from IDEQ and Tribal staff: This plan will utilize existing data and ongoing monitoring to identify and prioritize nutrient reduction actions.

4. Increase Public Awareness of Lake Conditions and Influences on Water Quality. Comment from IDEQ and Tribal staff: Only through awareness and understanding can nutrient management and reductions be achieved. Buy-in is critical to action.
5. Establish funding mechanisms to support LMP goal, objectives and strategies: Task; work with EPA to identify funding mechanisms to support water quality monitoring and modeling to inform EPA of their future decisions to call for actions in the Lake.

In 2021, IDEQ staff will implement the following efforts to address objectives outlined above:

Increase Scientific Understanding (LMP Objective 1):

1. Conduct water quality monitoring in Coeur d'Alene Lake for metals, nutrients, and physical parameters
2. Develop modeling objectives to guide selection of appropriate tools for lake management
3. Work with NAS contractors to share data and facilitate the third-party review

Nutrient Reduction and Implementation (LMP Objective 3)

1. Share the nutrient inventory report and any significant data from data gap monitoring (below) with stakeholders to help inform decision-making and direct efforts for nutrient reduction efforts
2. Continue lake tributary monitoring initiated in 2019 to fill gaps in nutrient loading data identified in the nutrient inventory report
5. Continue to identify opportunities to partner in implementation projects in the Coeur d'Alene Basin, including bank stabilization efforts in collaboration with Avista Corporation, the Natural Resource Conservation Service (NRCS), the Soil & Water Conservation Districts, the Counties, and landowners
6. Continue implementing aquatic plant surveys within the northern lake
7. Identify potential opportunities to align nutrient reduction and remedial efforts in the Lower Basin.
8. Coordinate with the Restoration Partnership on water quality improvement implementation.

Increase Public Awareness (LMP Objective 4)

1. Partner with Coeur d'Alene Tribe, University of Idaho (UI), CDA Vision 2030, Coeur d'Alene Regional Chamber of Commerce, and other agencies and stakeholders to share information and get feedback from the basin-wide community through the Our Gem Coeur d'Alene Lake Collaborative
2. Continue to partner with the Coeur d'Alene Tribe, UI and Kootenai Environmental Alliance to support Basin high schools by providing workshops and guidance to teachers and students involved in field-based watershed science through The Confluence Project
3. Partner with UI, area high schools, and area environmental organizations to host the annual Youth Water Summit, the culminating event of The Confluence Project (as pandemic restrictions allow)
4. Partner with UI/Community Water Resource Center to support the Bay Watchers program, to provide land management information and resources to residents around Coeur d'Alene Lake
5. Support the Local Gems program to recognize businesses and organizations that are taking action to protect basin water quality
6. Participate in other joint educational and outreach opportunities as time allows

Continued coordination with BEIPC forums will maximize opportunities for information exchange and advice for all the parties that participate in the BEIPC activities. Future coordination with the BEIPC recognizes that IDEQ retains its respective decision making authorities under CERCLA and the Clean Water Act (CWA) with regards to implementation.

2.2 COEUR D'ALENE TRIBE LAKE ACTIVITIES

As noted, the LMP was approved in 2009 however, after collecting and analyzing water quality data under and EPA approved Quality Assurance Program Plan (QAAP) that indicated declining water quality, as well as a myriad of other concerns, in 2019 the Coeur d'Alene Tribe retracted their support as an adopting government to the 2009 LMP. In order for the Tribe to demonstrate their concerns, they produced a critique of the LMP for a more complete understanding of the Tribe's position concerning the effectiveness of the LMP. The Tribe has asked EPA to formally evaluate how they will use their CERCLA authorities to address the legacy of mining pollution in Coeur d'Alene Lake. In 2021, the Tribe will conduct the following activities outside of the LMP process:

- Continue to improve Scientific Understanding of Lake Conditions through Monitoring, Modeling, metals, nutrients, and physical parameters.
- Tribal staff will continue to utilize the AEM3D and LOADEST models utilizing real-time data collected from the Lake and four meteorological stations
- Tribal staff will continue to implement a Eurasian watermilfoil Treatment Program as well as aquatic plant surveys in the southern lake.
- Tribal staff will continue to work with EPA identify potential opportunities to align nutrient reduction and remedial efforts in the Lower Basin.
- Provide draft updates to draft Lake Status Report will be provided to the TLG for feedback prior to distribution to the BEIPC.
- Identify nutrient reduction projects along tributaries with the assistance from stakeholders
- Tribal staff will continue to partner with the University of Idaho-Community Water Resource Center (U of I CWRC), CDA2030, Panhandle Health District, CDA Chamber of Commerce, interested citizens, and IDEQ to support the Basin high school students through The Confluence Project (a hands on 'place based' learning program address watershed science based solutions), the Bay Watchers Program (a citizen science program with landowners around the Lake), and the Our Gem Coeur d'Alene Lake Collaborative.
- Tribal staff will continue to support The Local Gems program for local businesses through 2021. This program recognizes businesses and organizations that are taking action to protect basin water quality.
- The Tribe will engage in the new NAS review of all relevant party lake water quality information.
- The Tribe will continue to request that EPA develops criteria and conducts a review/ evaluation of their decision to "defer" a remedy for the Lake.

2.3 FLOOD CONTROL AND INFRASTRUCTURE REVITALIZATION

Under a 2018 MOA, participating governments of the BEIPC and the Upper Basin jurisdictions (Local Flood Group) will continue to work on potential flooding issues on the SFCDAR. During 2021 the Local Flood Group and the BEIPC will continue to work with the U.S. Army Corps of Engineers (COE) and Federal Emergency Management Agency (FEMA) through a LOMAR to update the 2009 Flood Inundation Maps based on the current flood zone analysis by the COE on a portion of the River from Elizabeth Park to the Theater Bridge in Smelterville. Based on the new flood maps it is anticipated that updated analysis of the need for certified levees in the SFCDAR

may also be initiated in late 2021. The working group will also support the City of Pinehurst's request for COE assistance in performing a similar flood zone analysis in Pine Creek. Although much of the needed work outlined in the 2009 Drainage Control Infrastructure Revitalization Plan (DCIRP) is now complete, the BEIPC Executive Director will continue to assist Upper Basin communities and utilities in pursuing funding to implement the remainder of the DCIRP.

2.4 COMMUNICATIONS AND PUBLIC INVOLVEMENT

During 2021, the BEIPC Assistant to the Executive Director and agency Community Involvement Coordinators (CICs) will work together to carry out public involvement, communication, and education related to BEIPC and agency activities. Agency CICs may include staff from EPA, IDEQ, and PHD.

The Office of the BEIPC Executive Director, the Citizen Coordinating Council (CCC) and agency CICs continue to facilitate the public involvement process in the Basin. The BEIPC Executive Director and/or Assistant, Project Focus Team Chairpersons, and CCC Chairperson may request CIC support for public outreach regarding BEIPC activities. The CICs may in turn request BEIPC support for their agencies' public involvement activities.

Following is a partial list of community engagement activities and coordination opportunities for 2021:

- As required by legislation, the BEIPC will hold quarterly meetings open to the public. The CCC will hold meetings open to members and the public as issues or opportunities arise or discussions are warranted.

- The BEIPC will coordinate its annual tour in August of the Basin cleanup with publicity support from the CICs and technical support from agency project managers. The tour is open to everyone.

- The BEIPC/CCC and agency CICs will continue to sponsor activities such as open houses, workshops, training, or public meetings. The BEIPC Assistant and CICs may assist each other to coordinate public education and outreach associated with these events.

- The BEIPC/CCC will lead the development, production and distribution of BEIPC related items and the agency CICs will lead the development, production and distribution of agency items. The BEIPC/CCC and agency CICs will create and process flyers, public notices, newspaper ads, and posting to their respective websites of their meetings and other information. The BEIPC/CCC will also create, process, and distribute their meeting announcements, agendas, and their meeting summary notes and other information by e-mail to CCC members and interested parties. The BEIPC Assistant will update and maintain the BEIPC website.

- CICs will continue to support the CCC meetings, support BEIPC communications, and explore ways to maximize the CCC's value to interested local people. Upon request, CIC's may support BEIPC with suggestions for publicizing BEIPC events and meetings, participate in distributing meeting announcements, posting to social media, or by proposing and/or helping to implement communications strategies.

- Upon request, the BEIPC Executive Director will make presentations to public groups and participate in educational forums such as school district Science, Technology, Engineering and Math (STEM) fairs, etc. Assistance from agency CICs may be requested for these efforts. The Director will participate in quarterly press availability sessions, as scheduled by EPA.

- The BEIPC and agency CICs will help organize and participate in a joint booth for public outreach/education at the North Idaho Fair.

- The EPA will publish BEIPC/CCC information upon request in its triannual Basin Bulletin and on the CDA Basin Facebook page.

- CICs work directly with EPA, IDEQ, PHD, and BEIPC project managers as needed to tailor communications outreach and/or education for specific projects under the programs listed in this work plan.

- CICs will report their outreach activities at the quarterly Basin Commission meetings, and activities are often reported and discussed at CCC meetings.

2.5 STATE OF WASHINGTON ACTIVITIES

The Washington State Department of Ecology will continue to monitor the status of previous cleanups along the Spokane River. Site visits will be performed, along with visual documentation of performance and sediment accumulation. If changes in sediment accumulation are observed, a portable XRF will be used to measure contaminant concentrations.

2.6 RESTORATION PARTNERSHIP

The Restoration Partnership (Partnership) is composed of the Coeur d'Alene Basin Natural Resource Trustees, comprised of representatives of agencies/governments who have management and stewardship responsibilities for fish, wildlife, and other natural resources in the Basin. They are the U.S. Department of Agriculture, represented by the U.S. Forest Service (USFS); the U.S. Department of the Interior, represented by the U.S. Fish and Wildlife Service (USFWS) and Bureau of Land Management (BLM); the Coeur d'Alene Tribe; and the State of Idaho, represented by the Idaho Department of Fish and Game (IDFG) and Idaho Department of Environmental Quality (DEQ).

The following natural resource restoration projects will continue to be implemented in 2021.

- Conservation Easements along the Coeur d'Alene River corridor by the USFWS.

- Wetland and stream enhancement at Cougar Bay on Coeur d'Alene Lake by BLM and USFWS.

- Development of a native willow plant nursery adjacent to Hepton Lake on the St. Joe River by the Coeur d'Alene Tribe.

- Wetlands enhancement at Hepton Lake on the St. Joe River by the Coeur d'Alene Tribe.

- Projects for the replacement of injured/lost tribal cultural services (fish and culturally significant plants) in the Hangman Creek Watershed by the Coeur d'Alene Tribe.

- Coeur d'Alene Lake monitoring, modeling, and outreach by the Coeur d'Alene Tribe.

- Wetlands restoration planning at Grey's Meadow along the Lower Coeur d'Alene River by IDFG.

- Water Control Structure installation at Black Rock Slough Phase by IDFG.

- Gene Day Pond Public Access Improvements with the Shoshone County Sportsman Association and sponsored by IDFG.

- Wolf Lodge Creek Stream Restoration and Habitat Enhancement by the Kootenai-Shoshone Soil and Water Conservation District and sponsored by IDEQ.

- Ongoing operations and maintenance for the Schlepp Agricultural to Wetlands Conversion Project with the landowner sponsored by USFWS.

- The use of LiDAR data to prioritize restoration projects by the USFS.

- Cougar Gulch Wetland Enhancement with a private landowner and USFWS and BLM as sponsors.

- Lake Creek Watershed Restoration within Idaho by the Coeur d'Alene Tribe.

- Prichard Creek Phase 1: Conservation Easement and Restoration Planning with the Idaho Forest Group and Trout Unlimited and sponsored by IDEQ.

- Red Ives Creek Restoration and Dam Removal Design by the USFS.

- Trapper Creek Bridge and Fish Passage Project with Shoshone County and sponsored by IDFG with technical assistance from the BLM.

- Castle Rock Ranch North Fork Coeur d'Alene River Streambank Protection and Riparian Buffer Enhancement with a private landowner and sponsored by IDEQ.

In 2021, there will be ongoing coordination with EPA with remedy and restoration activities and participation in BEIPC and associated groups and committees.

For more information, refer to **www.restorationpartnership.org**.

DRAFT

BASIN COMMISSION (BEIPC)

2021 - 2025

FIVE YEAR WORK PLAN

10/29/20 Draft BEIPC Coeur d'Alene Basin Five-year (2021-2025) Work Plan

INTRODUCTION

This plan for calendar years 2021-2025 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 Executive Director with review and approval by the Technical Leadership Group (TLG) and review by the Citizen Coordinating Council (CCC), and is based on their recommendations for activities and work to be performed in the 5 year period, 2021-2025. Annual work plans will address specific actions from this five-year plan. This proposed five-year work plan 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 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 (RODA) for OU-2 and 3.

Part 2 includes work and responsibilities concerning management of Coeur d'Alene Lake by the Coeur d'Alene Tribe and State of Idaho, restoration of natural resources by the Natural Resource Trustees (Restoration Partnership) and work the BEIPC has assumed based on recommendations from the National Academy of Sciences (NAS) 2005 Study and requests from the government agencies, citizens and communities of the Basin.

PART 1 - ENVIRONMENTAL CLEANUP WORK

For Part 1, the scope of the proposed five-year work plan corresponds generally to the level of federal and state funding and the funding sources anticipated and work expected to be performed by the Coeur d'Alene Trust over the five-year period, 2021-2025. The 2021-2025 Work Plan proposes a cleanup approach and a listing of priority activities for the 5-year planning period.
The proposal includes the following work:

- Human Health directed activities including Residential and Community Property and Private Drinking Water Supply Remediation (Basin Property Remediation Program, BPRP), and the Recreation Use Activities Program.
- Lead Health Intervention Program (LHIP)
- Repository and Waste Consolidation Area Development and Management
- Remedial actions in the Upper Basin including source control actions, water treatment, and related human health activities provided for in the Upper Basin RODA.
- Remedial actions and/or Pilot Projects in the Lower Basin and risk reduction activities associated with recreational areas.
- Basin Environmental Monitoring
- Operation and Maintenance Responsibilities for Remedial Actions

PROPOSED ACTIVITY	SCOPE	OBJECTIVE	* LEAD AGENCY
Human Health directed activities including the Basin Property Remediation (BPRP), and Recreational Use Activities programs.	Complete remediation of any identified residential and community property sites and private drinking water sources as they are identified during the 5 year planning period. Address human health risks associated with basin wide recreational activities. Provide educational resources and health advisories to manage the potential for metals exposure through the consumption of fish. Incorporate human health related activities in the environmental cleanup projects as needed.	Remediate properties as they are identified and sampled and accepted for work. Most properties remaining to be sampled and/or cleaned-up will be properties whose owners have withheld access or properties whose owners have not responded to numerous contact attempts. For these reasons, it is anticipated that most of the remaining remediation will occur after property transfer or sales occur. Remediation of high risk properties will continue as agencies and the CDA Trust become aware of them. Implement actions to address human health risks from exposure to lead and other metals that can occur during recreational activities throughout the Upper and Lower Basin. Complete the Remedial Action Reports for the Paved Roads Program in 2021.	IDEQ EPA CDA TRIBE PHD

PROPOSED ACTIVITY	SCOPE	OBJECTIVE	* LEAD AGENCY
Lead Health Intervention Program (LHIP)	Panhandle Health District (PHD) administrates screening of children for elevated blood lead levels through Shoshone Medical Center providers. This has been occurring annually in the CDA Basin since 1996 as a public health service and as part of the Lead Health Intervention Program. 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 assess the effectiveness of 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. Community wide and area-wide results are made available to the public.	The Centers for Disease Control established the threshold value for blood lead levels in young children at 5 micrograms per deciliter of lead in blood. In response to this, PHD uses the 5 micrograms per deciliter as the trigger for follow up. Blood lead screening will continue during this 5-year period.	IDEQ PHD

PROPOSED ACTIVITY	SCOPE	OBJECTIVE	* LEAD AGENCY
Repository and Waste Consolidation Area (WCA) Development and Management	Repository and WCA activities center on these objectives: (1) operations at Big Creek Repository (BCR); (2) operations at the Big Creek Repository Annex (BCRA), East Mission Flats Repository (EMFR), Lower Burke Canyon Repository (LBCR), and Page Repository; (3) continued development and use of the East Fork Ninemile Canyon WCA for disposal of remedial action waste materials from the Ninemile drainage; (4) development of the Canyon Complex Repository/WCA and Quarry for remedial actions in Canyon Creek drainage and moving the old Silver Valley Natural Resource Trustee (SVNRT) Repository in Canyon Creek to the site of the Canyon Complex WCA; the siting and development of WCAs in the Lower Basin for implementation of remedial actions there.	Continue use of BCR and BCRA for Upper Basin remediations and Institutional Controls Program (ICP). Continue operations at EMFR for remediation and ICP in the Lower Basin. Operate and expand Page to accommodate ICP wastes in the Box. Continue to utilize the WCA in East Fork Ninemile Canyon. Develop and utilize the WCA in Canyon Creek including moving the SVNRT Repository to the WCA. Canyon Creek WCA activities include development and use of a clean borrow source (Quarry) for activities at the Canyon WCA. Continue to implement the WMS within the Area of Contamination. Evaluate repository and WCA cover design criteria and alternatives and develop cover plans which will include the final designs and monitoring plans. Consider the feasibility of future use options in the cap design phase for repositories. Explore potential sites and development plans for WCA sites in the Lower Basin.	IDEQ EPA PHD

PROPOSED ACTIVITY	SCOPE	OBJECTIVE	* LEAD AGENCY
Upper Basin Remedies	Implement the source control and water treatment remedies, ecological cleanup projects, and related human health activities identified in the Superfund Cleanup Implementation Plan (SCIP) for the RODA along with any accompanying coordination on natural resource restoration actions. Operate the groundwater collection system and new Central Treatment Plant (CTP) in the Box to accommodate contaminated water from OU-2. Source control actions in the Ninemile and Canyon Creek watersheds will be the focus for the 5 year period of time including development of the Canyon Complex WCA and Quarry as noted in the Repository and WCA section above.	The Upper Basin RODA primarily includes source control remedial actions to address contaminated surface water, soil, sediments, and source materials. Upper Basin and Box remedies are prioritized in order to reduce human health exposures and reduce the contribution of contaminants to downstream areas including the Lower Basin. Those cleanup actions will be coordinated with natural resource restoration actions. The Plan and inherent adaptive management process will help ensure human health exposure is prioritized and that the most effective actions are taken in Ninemile and Canyon Creek watersheds which are the sources for the most significantly impacted water quality outside of the Box.	EPA IDEQ Trust with Restoration Partnership

PROPOSED ACTIVITY	SCOPE	OBJECTIVE	* LEAD AGENCY
Lower Basin Remedies	Evaluate and prioritize potential ecological and source control remedies noted in the OU-3 ROD. Data sources to support this include RI/FS data, Clean Water Act (CWA) projects, and current data collection activities. Conduct pilot projects and implement, as appropriate, remedies that are captured in decision documents and that have a low potential for recontamination and/or that may inform future remedy decisions. Capture any such actions in annual work plans. Ensure that remedies are coordinated with natural resource restoration activities and the EPA's management plan. Coordinate as needed with the governmental structure that manages the Trail of the Coeur d'Alene's remedy. Identify recreation areas for remediation or develop substitute clean areas along the South Fork and main stem CDA River. Identify and implement programs to educate recreation site users regarding human health risks along the river corridor and how to minimize those risks.	Addressing risks to human health will remain a top priority through additional property cleanups, recreations site remedial actions, and education. Utilize information and recommendations from the Enhanced Conceptual Site Model (ECSM) for the Lower Basin, recent data collection efforts, and the sediment transport model to inform a management plan that targets areas for active remediation, evaluates the effects of remedial technologies, and identifies areas for natural recovery. The ECSM serves to refine the current working understanding of the Lower Basin with respect to river flows and contaminated sediment transport and deposition. Work with members of the Lower Basin PFT to evaluate multiple objectives for source control, clean off-channel habitat, and protecting human health. This will inform EPA's implementation planning over the next 3 to 5 years. Use investigation data, computational models, and other information to examine Lower Basin remedies previously selected in the 2002 OU- 3 ROD as well as pilot projects to test supplemental actions that are not explicitly identified by the ROD. A ROD Amendment or Explanation of Significant Differences (ESD) may be necessary if additional actions are deemed necessary to address riverbed source areas.	EPA with State and Federal agencies, CDA Tribe, and Restoration Partnership (RP).

PROPOSED ACTIVITY	SCOPE	OBJECTIVE	* LEAD AGENCY
Lower Basin Remedies (continued)		Plan and implement habitat area design and remediation (including treatability studies for soil capping and amendments) and river bed pilot projects. Produce and begin implementing a management plan to address contaminants mobilized in the Dudley Reach; this will be adaptive for application throughout the entire Lower Basin River channel. Conduct a thorough inventory of recreational beaches and banks to identify those beaches or banks that maybe considered for remediation during the immediate 5-year period and beyond. Document all actions as part of the SCIP. Implement the Grays Meadow Remediation and Restoration Project in cooperation with the Idaho Fish and Game and the Restoration Partnership. Evaluate and further characterize additional wetland properties for increasing feeding habitat for waterfowl. Produce and begin implementation of a riverbed management plan to address contaminants mobilized in the Dudley Reach and begin planning actions for the entire river system. Update the inventory of recreational beaches and banks to identify those beaches or banks that may be considered for remediation during the immediate 5-year period and beyond. Document all actions as part of the SCIP.	EPA with State and Federal agencies, CDA Tribe, and RP.

PROPOSED ACTIVITY	SCOPE	OBJECTIVE	* LEAD AGENCY
Lower Basin Remedies (continued)		Adaptive management will be a key component of any implementation actions and management plans.	EPA with State and Federal agencies, CDA Tribe, and RP.
Basin Environmental Monitoring	Continue to implement remedy effectiveness and long-term monitoring. Analytical results from site surface water, sediment, and groundwater sampling through 2015 are available through WQX, EPA's Water Quality Exchange; data management for the Bunker Hill Site is transitioning to Scribe.net, an EPA data management system that will be administered by Bunker Hill stakeholders including EPA, IDEQ, and the CDA Trust with support from the EPA Environmental Response Team.	Continue implementing the CDA Basin environmental monitoring plan (BEMP) under updated, optimized management plan produced in 2020. The goal of the updated BEMP is to provide a framework and metrics for remedy-specific effectiveness monitoring, area-wide monitoring, and long-term/site wide monitoring to evaluate the progress of cleanup actions, and for adjusting the monitoring program to inform ongoing and upcoming near-term cleanup actions. Information from this program will also help guide the SCIP process.	EPA with IDEQ, USFWS, USGS and CDA Tribe.
	*Note with planning and implementation of remedial activities, lead agencies will coordinate with federal, state, tribal and local agencies as appropriate.		

OPERATION AND MAINTENANCE RESPONSIBILITIES FOR REMEDIAL ACTIONS

Operation and maintenance responsibilities for remedial actions and cleanup work on the Site are as follows:

- Individual owners of properties remediated under the BPRP are responsible for operation and maintenance of the remedy and barriers on their properties in accordance with the Institutional Controls Program (ICP) administered by the Panhandle Health District (PHD).
- Operation and maintenance for public gravel and paved roads remediated in the gravel roads and paved roads remediation programs are the responsibility of the local governments with jurisdiction over those roads. Those jurisdictions include the East Side Highway District and Shoshone County, and the cities of Kellogg, Mullan, Pinehurst, Osburn, Smelterville, Wallace and Wardner.
- Operation and maintenance of projects constructed under the Remedy Protection Program are the responsibility of the governmental jurisdictions noted as the "Holder" of the Environmental Covenants executed for these projects and filed as riders to the deeds for the properties on which the work was performed. If no governmental jurisdiction is noted as the "Holder" the property owner holding title to the property involved is responsible.
- Operation and maintenance for remedial work performed by the Coeur d'Alene Work Trust (Trust) is the responsibility of the Trust.
- Operation and maintenance of the new Central Treatment Plant in Kellogg will transfer to the State of Idaho at the end of the test operation period performed by the Contractor for that project. This transfer is anticipated in October 2021.
- Operation and maintenance of remedies performed by various parties under CERCLA authorities utilizing funding from appropriated funds and other sources placed in EPA's Superfund Account are the responsibility of the State of Idaho.
- Operation and maintenance of remedies on Bureau of Land Management (BLM) and National Forest System Lands within the Site and in the North Fork CDA River Drainage are the responsibility of the BLM and USDA Forest Service.

PART 2 – OTHER ACTIVITIES AND RESPONSIBILITIES

For Part 2, the scope of the five-year work plan recognizes a number of work items that the BEIPC will be involved in and items of work needed to accommodate some of the recommendations of the 2005 NAS study; it also includes implementation of the Lake Management Plan by the State of Idaho and CDA Tribe, and coordination with the activities of the Natural Resource Trustees. The plan includes the following work:

- Lake Management Activities
- Flood Control, and Infrastructure Revitalization
- Communications and Public Involvement
- Coordinate with the Restoration Partnership

2.1 LAKE MANAGEMENT ACTIVITIES

The OU-3 Interim ROD did not include CDA Lake in the Selected Remedy. 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. The Upper Basin RODA indicated that a remedy for Lake bed contamination has been deferred contingent on successful management through the LMP. The LMP's goal is to manage metals in contaminated Lake bed sediments through a nutrient management plan as well as outreach and education with property owners related to potential impacts of contaminated sediments on water quality in the Lake.

As of the summer of 2018, the Coeur d'Alene Tribe (CDA Tribe) asserted that the LMP is inadequate, in itself, as an effective tool to protecting water quality in the Lake and has been in discussions with the IDEQ and the EPA to determine what additional mechanisms/actions are needed to manage the hazardous substances in the lake bed sediments. The State of Idaho has initiated a third-party review of lake management data by the National Academy of Sciences (NAS) to help inform an appropriate response to undesirable water quality trends. IDEQ staff continues to operate under the LMP as discussions with the Tribe and EPA continue and the third-party review commences and progresses. This work plan includes activities planned for implementation by IDEQ and Tribal staff.

Objectives of the LMP (as outlined in Section 3) include the following:

1. Improve Scientific Understanding of Lake Conditions through Monitoring, Modeling, and Special Studies.
2. Establish and Strengthen Partnerships to Maximize Benefits of Actions under Existing Regulatory Frameworks.
3. Develop and Implement a Nutrient Reduction Action Plan.
4. Increase Public Awareness of Lake Conditions and Influences on Water Quality.
5. Establish Funding Mechanisms to Support the LMP Goal, Objectives, and Strategies.

Below are activities envisioned for implementation throughout the 5-year planning period: These activities are categorized broadly under objectives 1, 3, and 4 from the LMP; Objectives 2 and 5 are intertwined throughout all objectives.

Table 2-1 Summary of Coeur d'Alene Lake Management Activities Proposed for Implementation for 2021-2025

Objective 1. Increase scientific understanding			
Proposed Activity	**Scope**	**Additional Objective(s)**	**Lead Participants**
Continue core lake water quality monitoring	Continue monitoring throughout CDA Lake for metals, nutrients, physical parameters, and biological communities.	Facilitates Objective 5	IDEQ CDA Tribe Support from EPA
Third-Party Review	Coordinate with the NAS to provide all relevant data for third-party review of lake management	Objectives 2, 3, 4	IDEQ CDA Tribe NAS
Science reporting	Progress in coordinating with the NAS will be reported to the TLG and BEIPC.	Objective 2	IDEQ CDA Tribe
Objective 3. Develop and implement a nutrient reduction action plan			
Proposed Activity	**Scope**	**Additional Objective(s)**	**Lead Participants**
Basin-wide nutrient inventory	Nutrient loading information has been compiled into a report. The information will be updated as appropriate, using available data.	Objectives 1, 2, and 5	IDEQ
Bank erosion inventory	Bank erosion inventories will be updated as appropriate.		IDEQ AVISTA SWCDs

Bank stabilization	Continue to collaborate with AVISTA Corporation, the Natural Resource Conservation Service (NRCS), the Soil & Water Conservation Districts (SWCDs), the Counties, and local landowners to identify, prioritize, and implement erosion reduction projects.	Objective 2	IDEQ CDA Tribe AVISTA NRCS SWCDs
Nutrient reduction action plan	Continue to communicate nutrient load monitoring and estimate results to Watershed Advisory Groups, county representatives, and other potential partners.	Objectives 2 and 5	IDEQ CDA Tribe Universities
Implementation coordination	Continue to work with CDA Basin Watershed Advisory Groups, county representatives, and other stakeholders to coordinate implementation opportunities.	Objectives 2 and 5	IDEQ CDA Tribe SWCDs
Aquatic Invasive Species	Continue implementing aquatic plant surveys within northern pool bays. Identification of invasive species will be reported to AVISTA Corporation and Idaho State Department ofAgriculture without delay.	Objective 1	IDEQ CDA Tribe AVISTA ISDA Kootenai County
Remedy implementation support	Continue to participate in the Lower Basin PFT and TLG and support implementing projects identified in the 2002 OU-3 Interim ROD.	Objective 2	IDEQ CDA Tribe EPA BEIPC

Objective 4. Increase public awareness of lake conditions and influences on water quality			
Proposed Activity	**Scope**	**Additional Objective(s)**	**Lead Participants**
LakeASyst	LakeASyst (Lakeshore Assessment System) materials will continue to be utilized.	Objectives 2, 3 and 4	IDEQ CDA Tribe UI
Demonstration sites	Improvement projects will be utilized to demonstrate effective strategies and encourage further implementation.	Objectives 2 and 3	IDEQ CDA Tribe SWCDs
Our Gem Collaborative	Partner with CDA Tribe, University of Idaho, CDA Vision 2030, Coeur d'Alene Regional Chamber of Commerce, and other agencies and stakeholders to share information and get feedback from the basin-wide community through the Our Gem CDA Lake Collaborative education subgroup	Objectives 2 and 4	IDEQ CDA Tribe Stakeholders
K-12 Education	Continue to work with the CDA Tribe, UI, and area educators to incorporate water quality education into classroom programming.	Objective 2	IDEQ CDA Tribe UI K-12 schools
General Outreach	Continue to participate in relevant education and outreach opportunities as time and resources allow	Objective 2	IDEQ CDA Tribe U of I
Local Gems	Continue to support the Local Gems Recognition and Awards program in Collaboration with the CDA Regional Chamber of Commerce.	Objectives 2 and 3	IDEQ CDA Tribe CDA Chamber

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 FLOOD CONTROL AND INFRASTRUCTURE REVITALIZATION

Under a 2018 MOA, participating governments of the BEIPC and the Upper Basin jurisdictions (Local Flood Group) will continue to work on potential flooding issues on the SFCDAR. During this 5-year planning period, the Local Flood Group and the BEIPC will continue to work with the U.S. Army Corps of Engineers (COE) and Federal Emergency Management Agency (FEMA) through a LOMAR to update the 2009 Flood Inundation Maps based on the current flood zone analysis by the COE on a portion of the river from Elizabeth Park to the Theater Bridge in Smelterville. Based on the new flood maps it is anticipated that updated analysis of the need for certified levees in the SFCDAR will also be initiated in the planning period. The working group will also support the City of Pinehurst's request for COE assistance in performing a similar flood zone analysis in Pine Creek. Although much of the needed work outlined in the 2009 Drainage Control Infrastructure Revitalization Plan (DCIRP) is now complete, the BEIPC Executive Director will continue to assist Upper Basin communities and utilities in pursuing funding to implement the remainder of the DCIRP. The Executive Director will also coordinate with the local infrastructure jurisdictions on an Operation and Maintenance plan for existing drainage structures in the Upper Basin.

2.3 COMMUNICATIONS AND PUBLIC INVOLVEMENT

During the 5-year planning period, the agencies will continue to address issues and facilitate public involvement and education in BEIPC activities. The agencies will also facilitate communication between the Basin community, the BEIPC, the Superfund cleanup, and natural resource restoration implementing agencies. The CCC will continue to be the focus organization to assist in implementing this process.

2.4 RESTORATION PARTNERSHIP

The CERCLA natural resource trustees in the Coeur d'Alene Basin are the United States (represented by the U.S. Forest Service, U.S. Fish and Wildlife Service, and U.S. Bureau of Land Management), the Coeur d'Alene Tribe, and the State of Idaho (represented by the Idaho Department of Fish and Game and Idaho Department of Environmental Quality). A series of lawsuits followed the Superfund designation in the Coeur d'Alene Basin for response costs and natural resource damages. Natural resources injured by contamination included but are not limited to; surface and groundwater, fish, birds, riparian resources, macroinvertebrates and phytoplankton.

Under CERCLA, settlements were reached with all parties. Following the final 2011 settlement agreement, the Trustees entered into a Memorandum of Agreement to address the planning and implementation of restoration for natural resources and associated services injured, destroyed or lost as a result of the release of mining-related hazardous substances into the Coeur d'Alene Basin.

As specified in CERCLA the funds will be dedicated to projects that restore, rehabilitate, replace, and/or acquire the equivalent of the injured natural resources. The Trustees' goal is to restore the health, productivity, and diversity of injured natural resources and the services they provide in the Restoration Planning Area.

The Trustees will continue to implement their Restoration Plan which is a programmatic guide for restoration of injured natural resources in the Restoration Planning Area and those activities will be coordinated with remediation actions. During the 5-year planning period, the Partnership will continue to coordinate with the BEIPC and provide updates on restoration planning efforts and implementation of restoration projects that will be solicited by the Trustees and from interested parties. The Partnership will continue to coordinate closely with EPA and the CDA Trust to integrate restoration planning and implementation with remediation projects. See annual BEIPC Work Plans for more details or refer to www.restorationpartnership.org.

APPROVED

September 30, 2020

TLG Meeting Notes

Technical Leadership Group (TLG)

Meeting Summary Notes

September 30, 2020, 1:00 p.m. – 3:00 p.m.

Microsoft Teams Meeting

(These summary notes are intended to capture key topics, conclusions, and next steps and not every detail of the presentations or discussions.)

Welcome/Introductions:

Terry Harwood (BEIPC E.D.), Gail Yost (BEIPC, note taker), Andy Helkey (IDEQ), Ed Moreen (EPA), Patrick Hickey (EPA), Bonnie Douglas (Citizen, CCC), Craig Cooper (IDEQ), Dan McCracken (IDEQ), Lauren Zinsser (USGS), Kim Prestbo (EPA), Kim Pierson (IDFG), Jamie Brunner (IDEQ), Bonnie Arthur (EPA), Dana Swift (IDEQ), Jerry Boyd (CCC Chair), Brad Smith (ICL), Dale Chess (CDA Tribe), Dave Leptich (IDFG), Christy Johnson-Hughes (USFWS), Scott Fields (CDA Tribe), Rebecca Stevens (CDA Tribe, Acting TLG Chair), Tim Price (USFS), Jamie Sturgess (Kootenai County, TLG Rep), Sandra Treccani (Washington State)

Status update on FY20 remedial and planning activities: EF Ninemile and Canyon Creeks, Pine Creek – Bonnie Arthur - EPA RPM, oversees the CDA Trust on mine and mill site cleanups; also on the Rec Sites team in the Upper and Lower Basin. She started with an update on the Canyon Creek watershed – primarily the Canyon Complex Repository – or WCA that is being constructed there. This is located next to the old SVNRT Repository that has been leaking for some time into Canyon Creek. They are into the second construction season and should run until the end of October. Next year they should be able to move the old waste material from SVNRT into the new WCA and still have over 1.5M cy additional capacity for other Canyon Creek mine and mill site waste. One of these sites being the Hecla-Star, which is made up of 4 different sites. They are currently at 60% design with hopes of hauling to the WCA in 2023. The Tamarack #7 has a large flowing adit that you can see from Burke Road. This is a high priority site as it is used as a drop off point for recreational use. All field investigations were finished this summer, starting the design this year into next year 2021. Other field work has been going on at the Flynn Mine and Black Bear Fraction. These two are a high priority as well for recreational use and residential houses. There will be quite a few other Canyon Creek sites that will also see field work and investigations into next year.

Bonnie continued on to East Fork Nine Mile watershed – the EFNM WCA was completed in 2013 and has taken waste from the Interstate Callahan and Success Mine cleanups, both are complete and finishing up Interstate Mill waste this year. There is a big push to finish up projects in Nine Mile and close this WCA by 2024. A partial cover was done in 2019, and another partial cover will be completed in 2021. The EFNM Riparian area was split into two parts –an upper portion (just below Success Mine) that will start in 2021, and the remaining portion that extends down to the Dayrock Complex, which is made up of a few mine and mill sites, including the Dayrock Mine. Rebecca asked if Hecla had plans to

remove all the infrastructure and buildings at the Star Complex as part of the remediation. Bonnie answered that they will be able to clean up the whole complex with the removal of only one building.

Ed Moreen EPA – in the 2020 Work Plan, we focused on the selection of a pilot project for 2020 in the Dudley Reach area on the CDA River; we are continuing pushing forward with this task. Various project alternatives were shared with the Lower Basin PFT in 2020 to identify, evaluate and select pilot projects to address contaminated sediment in the river bed. Dudley Reach is one of four reaches - it extends from the Old Mission boat launch to the Bull Run Bridge. Our approach based the selection on multiple criteria – some sediment and data-based criteria and some based on sediment transport modeling; such as estimated change in lead concentrations over time or river bed lead mass. Sampling from river mile marker 160 at the Dredge pool down to 153 at Bull Run Bridge shows a pretty extensive jump in sediment concentrations and suspended sediment. Various alternatives have been looked at – dredging, dredge/cap hybrid, capping, river-bed structures (e.g. sills) to address erosion, as well as monitored natural recovery or enhanced monitored natural recovery. Bank stabilization will be part of the process moving forward. Pilot projects will be managed under an adaptive management framework. We hope to learn a lot from these pilot projects – both from an implementation ability and constructability process, but also from system responses during floods and normal flow periods – to get a good handle on how much sediment gets mobilized or not from these efforts. Some work has already been done through the CDA Trust – they have installed new bank erosion pins, assessed erosion on the old pins, riverbed pre-design characterization, coring in the upper section from river mile 157 thru 159. We continue to look for repository/WCA needs and are coordinating with the Trust on the pilots to be implemented – typical implementation schedule would be 4 to 5 years. A lot of planning has to be done, especially with the first river bed remedial action pilot project.

Patrick Hickey EPA – oversees repositories; when EPA knew the Lower Basin pilot projects were coming up and the potential for waste to be generated, they wanted to get ahead of the project to make sure there was a place to put this waste. They engaged the public through public notices, social media, basin bulletin, email lists, and sent a fact sheet that was mailed to over 2,400 addresses in the Lower Basin. A 2009 developed citizen criteria for repositories was used as a foundation for the public to address concerns or comments, and offer insights or suggestions for improvements. This 30-day comment period goes thru today, September 30th, and has received 8 inputs so far. Of these, there were concerns of wide-spread damage in the Lower Basin; that the 2009 citizen's criteria covered most of the bases and was a good path forward; suggestions to look at alternatives to WCA's; and maps should be produced showing potential sites. There was also concern about property purchased by the Trust on S. River Road - Patrick explained the use is to be for staging equipment and source material for rock and cover soil. All comments will be replied to individually.

Updates on the CTP upgrades – Ed Moreen provided an update on the CTP/GWCS. The progress since the last BEIPC meeting; the gaps have been closed in the ground water cutoff wall so the wall is complete. Additional wall capping and final grading taking place at the GWCS, and then final grading

will happen at the CTP. They are going through the construction punch list and in the midst of acceptance testing. Once this testing is satisfactory, the contractor will have a one-year operational period before finalizing their contract and turning operations over to IDEQ. All systems are operating and performing well.

Rec. Sites update – Andy Helkey IDEQ; in the Box, they are in the process of completing one Rec. Site project this fall. It is located at the Theater Bridge, which is a piece of property along the SFCDA River; it's a parking area commonly used to access a swimming hole and other recreation. A cost proposal will be going out, a contractor selected based on qualifications and hopefully completion in October. They will work on more design work for other Box projects early in 2021.

Bonnie Arthur – EPA, provided an update for the Basin Rec. Sites. There are several agencies working together on projects in the Box and Basin:

- Furthering education through signage - 12 new signs going up this week along the CDA River;
- Informational mailer to property owners along the CDA River – will go out under the BEIPC;
- Working on boat launches – how to clean up after spring flooding, how to reduce access to contaminated sediments and soils by adding pavers, planting willows and alders to restrict access to yearly re-contaminated areas;
- Cataldo boat launch is currently on hold – a design for this project is complete, some comments have been submitted, waiting for further comments;
- Sampling at a possible beach cleanup located across from the Blackrock trail head, sampling is planned for early November;
- One day project in the Canyon Creek watershed – a swimming hole that has been used informally, will add rip rap to the bank to reduce access;
- Continuing the hand wash stations at a few boat launches;
- Sampling took place at Kilarney Lake at an area used for volleyball.

Rebecca added that the 'Our Gem' lake maps have officially been sent to the printers and should be available later this month. She will coordinate with Jamie Brunner IDEQ for distribution.

Update on Paved Roads Program work this Summer – Dan McCracken stated it was an eventful year for the paved roads remediation program. In the Box, Kellogg was working on three segments – Bunker Avenue, Wildcat Way and Hill Street. All of the eligible segments on the list in the Box have been completed and we'll be working on closing this out.

For the Basin, Shoshone County is the last jurisdiction with eligible segments. There were 34 projects on their list this year – highlights were Bauman Addition, Terror Gulch, Two Mile, the last streets in Silverton and Woodland Park. With the $3.6M that the County spent this season, that rounds out the $24M allotment for the Basin paved roads program. Our intent initially, was that each jurisdiction would use their full funding allotment and only finish a little more than half of the eligible segments. We

were able to complete every segment in the Box and only 16 left in the Basin from the original list, all within the County. All of the other jurisdictions, except Shoshone County, were able to finish all their segments. The 16 left were rated low priority based on proximity to residences and other factors. We will be moving forward with a Remedial Action Completion Report for the program to hopefully be published sometime next year.

Terry also commented on the paved roads program, 581 total segments completed which is a tremendous accomplishment!

Update on Gray's Meadow – Kim Prestbo EPA RPM, gave an overview on the Gray's Meadow project. It was formerly known as the Black Lake Ranch, located in the lower regions of the CDA River, a historic wetland used for agricultural and ranch use. In 2017, IDFG purchased the property and has continued to manage it as a conservation area. It came to the top of the list for both Restoration Partnership and EPA as a priority to create a functioning ecological habitat for waterfowl. It is a model on how to integrate remediation and restoration to a design for all parties involved and is going very well. We have spent the last couple years sorting out the hydrology of the site, the water balance, and collected some of the first baseline water quality data. In order to make it functioning, restored wetlands - to be able to manage watering and de-watering as done historically - we will be looking for alternatives for managing water as it was pumped into Black Lake before and is a concern for the community members there. The 30% design is complete and we are now working on the 60% design. In 2021, we will be working on infrastructure and access water level management, holding off till 2022 for big construction.

Dave Leptich from IDFG gave a presentation on Gray's Meadow. The major project goals are: clean up the soil to below ROD Cleanup levels; convert the Ag land back to a functional wetland habitat; manage recontamination risk to protect the investments made; improve water quality especially in Black Lake; and provide safe recreational, educational and cultural opportunities for the community. Our approach is to integrate restoration with remediation, which are complimentary actions to each other. This is a coordination of independent actions into a single entity to increase efficiency and improve the outcomes. We have a single unified design team and as a result, everyone is involved in every step – less miscommunication, immediate feedback and the full team is invested. We have been working on data collection to support our final design and some preliminary design concepts. Hydrological studies included the installation of 17 piezometers to monitor ground water movement and its relationship to surface water changes particularly in the River and Black Lake. We found the soils were tight with poor ground water connectivity between wetland basins and the River, extending to a depth between 5 and 15 feet across the site. When we manage the wetland in the future, the water budget will be driven by annual precipitation and seasonal runoff, with very minimal groundwater seepage to take water out of the wetland or recharge the wetland. We expanded soil characterization to better map the concentration in both the horizontal and vertical distribution of various metals across the project site. We also did agronomic sampling to help us mitigate remedial effects on productivity and help plan for soil

amendments ahead of planting. Lead and Zinc leaching studies are also being conducted to ensure metals don't solubilize and release and migrate through ground and surface water. It is estimated that there is over 300,000 cy of contaminated soils to be dealt with - 25,000 12yd dump trucks.

Black Lake has significant water quality issues. A 2011 TMDL identified water transfers from the Gray's Meadow Ag fields as a significant source of nutrient loading, which contribute to blue-green algae blooms that cause health concerns and impact recreational use. Since IDFG acquired the property, livestock have been removed; fertilization of hayfields has ceased; and we expect water quality to improve, and with time, decrease or eliminate the impact of water transfers on Black Lake and the CDA River. In coordination with IDEQ/CDA Tribe, we are conducting a year-long water quality monitoring study that will create the best baseline database to date, and will be available to measure project effectiveness in the future. Cultural Resource Surveys were conducted and these investigations found no significant findings within the project boundary area. EPA and the CDA Trust are close to completing a programmatic Historic Properties Management Plan for the Lower Basin.

We just released the 30% design for Gray's Meadow to the major stakeholders on September 17th. Stakeholder meetings will be taking place and feedback over the next 30 days will be very important as they will be incorporated in the 60% design. Our remediation strategy involves three primary actions: excavation of the most highly contaminated soils; consolidating those soils on-site and capping in-place with clean material; and in areas of lower contamination levels, tilling to mix and dilute those metals below our clean-up concentration targets. Our restoration strategy also depends on three primary design features and revegetation of the site when done: Microtopography – first small changes in ground surface elevation, good diversity of plant communities; Edge Complexity – the edge between two or more communities like riparian and wetlands, you get the most habitat out of an area with complex edges; and Water Management – allows management of hydrological variation in timing, depth and duration inundation for wetland productivity and plant diversity.

Most of the infrastructure developments end up being roads, dikes or water control structures. Dave explained these in detail where they will be placing and developing throughout the site. They are also looking at some new parking areas adjacent to a dike that crosses to the Trail of the CDA. The proposal of two new 'oasis' spots where people can get off the trail, provides a clean apron where folks can enjoy the wetland without violating the remedy. Another recreation feature will be an ADA accessible viewing and access blind for people with mobility difficulties to allow for viewing and hunting wildlife.

The tentative schedule shows the release of the 30% design, with the 60% ready to review in January, 2021, and have a full construction design by next summer. Late Summer/Fall 2021 we would start initial construction/access and water transfer infrastructure with Remedy/Restoration starting in 2022.

Update on other Restoration Partnership activities – Rebecca started off her update for the Restoration Partnership. Their section has been updated in the BEIPC Annual 2021 Work Plan, and the

trustees will be producing an accomplishment report for this past year which will indicate expenditures and progress on projects. Just continuing on with activities as best they can through COVID with Restoration Partnership project implementations, designs, and permitting coordination with trustees and other stakeholders. They are finalizing their three to five year work plan and will share with the public on their website, which also has updates and progress on individual projects. Rebecca will be sending out an email with a link showing the Salmon Release Project that the Tribe was able to implement.

Status update on NAS study of CDA Lake – Jamie Brunner IDEQ, stated they have finalized a scope of work and are finalizing the contract paperwork with the National Academy for their review. The goal was to start in October which is looking promising. The study is expected to take 23 months, with a projected cost of $775,000. IDEQ and Kootenai County have entered into an MOA as the county has contributed $200,000 towards the study. Rebecca asked if Jamie could expand on the scope of work. She followed with a list of what is included:

- Evaluate the current water quality data in the lake, rivers and lateral lakes, focusing on trends, nutrients and metals;
- What is the impacts of anoxia on the state of metals and nutrients;
- What are the implications of the zinc levels that might be influencing productivity;
- Based on current metals found in lake bed sediments, will they be released into the lake if current trends continue;
- If there isn't sufficient data available to make those determinations, what sort of recommendations would the NAS need – what sort of data are required to achieve that level of confidence to know what trajectory we're on;
- What is the relevance of these metals releases in the lake to human and ecological health?

Rebecca asked if the NAS would be reaching out to the entities that have been collecting this water quality data and Jamie answered yes. Dan McCracken added that the NAS does not plan on completing any additional sampling; they will be looking at all the data that has already been collected. They will develop a committee of technical experts on their end and plan on meeting 5 times over an 18-month period to interview with all entities and staff that have been involved. Then all this information will be digested and questions answered in the scope of work. Jerry Boyd wanted to know if there will be any public meetings before they issue their final report. Dan answered that he didn't know; they will be sharing information through the BEIPC but not sure the NAS will be hosting any meetings. Jamie agreed and said they do not have any responsibility to conduct any public meetings. We will share information when there is something relevant using our networks to get some of that information out into the community, opportunity for feedback. Jerry said originally when the NAS did their 2005 report, there were public meetings. Ed added that they conducted a few listening sessions because things were so controversial. Rebecca said that was different as that was a Congressional decision to have NAS come in.

Updates on Leadership retirements, new staff appointments, and BEIPC Board appointments (if available) - Dan McCracken updated us on staff changes since the last TLG meeting. He has moved from the Kellogg Office Manager to Regional Administrator for IDEQ in CDA. Andy Helkey has moved from ICP Program Manager at PHD to Kellogg Program Manager for IDEQ. Director Tippets IDEQ retired in June, and was recently replaced by Jess Byrne who was deputy director. Andy will step into the role that Dan held on the BEIPC as the TLG representative for the Kellogg Office. Director Tippets board position on the BEIPC has not been approved yet for Jess to be formerly appointed, so if this is not done by the November meeting, Michael McCurdy will step in as the alternate. Terry added for commissioners representing the State and 3 counties, the nomination and appointment come in a letter from the Governor of Idaho. Depending on election results, other commissioner changes could probably affect Jack Buell in Benewah County, and the EPA commissioner determined from the Presidential Election. We will hold election of new officers for the BEIPC at the March 2021 meeting.

Ed added changes for EPA personnel – the new Division Director of Emergency Response and Remedial Program is Calvin Terada, previously held by Sheryl Bilbrey. Kera Lynch has been selected as the new Remedial Cleanup Program Manager - this position was held by Cami Grandinetti. Other new additions are Patrick Hickey and Jenn Crawford as Remedial Project Managers.

Bonnie Douglas asked if there was anyone in the PHD position and Andy answered that the job was just posted and will be hiring in the near future.

Discuss the 2021 Workplan and reference the Sections that Terry will have sent out earlier in Sept. and plans for Oct. meeting to approve work plans – Rebecca stated that the work plans are traditionally reviewed at an in-person meeting. Terry has sent out the draft of the Annual 2021 work plan by email; the 5-year work plan has two different sections for the LMP, Rebecca and Jamie will get back together and re-submit, then Terry will send that out. He stated that everyone did a great job!

Rebecca's suggestion for getting comments back to Terry is to use the 'bubble' feature on the document to track changes, and then Gail can combine all the comments. She opened it up for any other ideas – Dan agreed that this would work best. They all decided to get any comments or feedback to Terry and Gail by October 9th. Jamie would like to make sure that the State and counties have agreed on the LMP sections for both the annual and five year work plans before they are finalized.

Plans for Nov. mtg if in person to be held in CDA rather than Spokane Valley – Terry sent out a poll to commissioners and alternates for their vote whether to have an in-person November BEIPC meeting. There are mixed results so far – Rebecca asked if any of the entities on the call had insight as to what their agencies were allowing. Ed said EPA would probably not be able to send a representative given where we are now and the re-opening phases. Terry's concerns are that the work plans must be approved; some of the presentations and updates on projects could be presented at a later meeting. Ed asked if there would be any harm in postponement of the work plans till next year. Terry said that

happened the first year he worked for the BEIPC, he thinks we can work through this and get the work plans approved before the next calendar year. Terry also stated that the work plans must be presented to the public, and cannot just be approved internally. Rebecca feels that we should have a BEIPC staff call and discuss some ideas and different formats on how to make this happen. Other agencies are not allowing travel or in-person meetings as well. Ed questioned if the draft work plans could be posted on the BEIPC website, working through the CCC for public awareness. Yes, after approval, they will be email to the BEIPC mailing list – so essentially we would have the public presentation.

Election of TLG officers – currently the Chair is held by Dan McCracken, and vice-chair by Rebecca. Jamie made a motion to elect Andy Helkey as chair, Ed second – all approved **M/S/C.**

Andy made a motion to elect Rebecca as vice-chair, Ed second – all approved **M/S/C.**

Meeting was adjourned at 2:51 p.m.

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