



BEIPC

Basin Environmental Improvement Project Commission

1005 W. McKinley, Kellogg, Idaho 83837

(208) 783-2528 • FAX: (208) 783-4561 • <http://www.basincommission.com> • info@basincommission.com

Terry Harwood
Executive
Director

October 25, 2021

To: BEIPC Commissioners, Alternates, Staff, TLG and CCC Chairs

From: BEIPC Executive Director

Subject: BEIPC November 10, 2021 Quarterly Meeting

Enclosed is the meeting packet for the upcoming November 10, 2021 BEIPC Meeting. The Executive Director and Staff have made arrangements for attendance at the meeting remotely or in person at the IDEQ Regional Office, Osprey Room, 2110 Ironwood Parkway, Coeur d'Alene. Remote attendance and wearing of masks is encouraged as the room has limited space to spread out for health reasons. The Executive Director, some BEIPC Staff and IDEQ helpers will be present to run the virtual meeting process. The Executive Director's presence meets the requirement for at least one of the BEIPC being present in person. The State of Washington DOE is assisting in making arrangements for the virtual meeting.

The attendee link is:

<https://watech.webex.com/watech/onstage/g.php?MTID=e4b39d7191425a78d6e2dac937833c380>

Click "Join Now"

If you only want to join the Audio conference:

Call the number below and enter the access code.

US Toll: +1-415-655-0001

Toll Free +1-855-929-3239

Access code: 2465 749 7807

We have a number of action items including approval of the 2022 Annual and 2022-2026 Five Year Work Plans, and a discussion and approval of an amended BEIPC Policy and Procedures Document I have been working on with the Idaho Attorney General's Office. I have included the current document and the new draft in the packet for your review prior to the meeting.

If you have any questions call me at 208-783-2528 or e-mail at terry.harwood@deq.idaho.gov.

Terry A. Harwood, PE
Executive Director

Enclosure

November 10 BEIPC Meeting Packet Items

- Meeting Guidelines
- Draft November 10, 2021 Meeting Agenda
- Abbreviations and Acronyms
- Draft Revised BEIPC Organizational Practices and Procedures for Action
- Draft March 10, 2021 meeting minutes
- Draft 2022 Annual Work Plan
- Draft 2022-2026 Five Year work Plan
- 2021 IDEQ and BEIPC Outreach Update

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 10, 2021 9:00 AM – 1:30 PM
IDEQ Regional Office Osprey Conference Room
2110 Ironwood Parkway
Coeur d' Alene, Idaho

Contingent on current health and 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 internet and/or telephone, contact Terry Harwood by November 5th at terry.harwood@deq.idaho.gov or 208-783-2528.

- | | |
|----------|---|
| 9:00 AM | Call to Order |
| 9:05 AM | Introduce new BEIPC Board Members |
| 9:15 AM | Approve the minutes from the March 10 virtual meeting (Action Item) |
| 9:30 AM | Review and Discussion of Updated BEIPC Policy and Procedures Document |
| 10:00 AM | Public Comment on Draft Policy Document |
| 10:10 AM | Approve Draft BEIPC Policy and Procedures Document (Action Item) |
| 10:20 AM | Break |
| 10:30 AM | Review and Discuss Draft 2022 Annual Work Plan – Terry Harwood and Board |
| 11:05 AM | Public Comment on Draft 2022 Work Plan |
| 11:15 AM | Approve 2022 Work Plan – Board (Action Item) |
| 11:25 AM | Review and Discuss Draft 2022-2026 Five Year Work Plan – Terry Harwood and Board |
| 11:55 AM | Break |
| 12:05 PM | Public Comment on Draft 2022-2026 Five Year Work Plan |
| 12:15 PM | Approve 2022–2026 Five Year Work Plan – Board (Action Item) |
| 12:25 PM | CCC and Public Input Session and Discussion |
| 12:35 PM | Update Lake Management Plan, NAS and Coeur d'Alene Lake Advisory Committee Activities – Jamie Brunner, IDEQ |
| 1:05 PM | Outreach Activities during last year – Terry Harwood |
| 1:15 PM | Update on Restoration Partnership activities – Rebecca Stevens, CDA Tribe |
| 1:30 PM | 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

EXISTING

BASIN COMMISSION (BEIPC)

**Organizational Practices
and Procedures**



Printable PDF version of BEIPC Practices and Procedures

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 Basin¹ 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.

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. The Executive Director shall consult with the BEIPC Chair for the Executive Director to represent the BEIPC on special tasks outside normal CDA Basin issues. (Addition approved May 23, 2018.)

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 make 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 Organizational Practices 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.

Revision Date: May 23, 2018

Note 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.

DRAFT REVISED

BASIN COMMISSION (BEIPC)

**Organizational Practices
and Procedures**

Draft Basin Environmental Improvement Project Commission Board Organizational Practices and Procedures

INTRODUCTION/OVERVIEW

The Basin Environmental Improvement Project Commission (BEIPC) 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 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 as stated in the Memorandum of Agreement for the Basin Environmental Improvement Project Commission (2002 MOA) (dated August 13, 2002). The BEIPC works through the direct exercise of certain authorities of the State of Idaho (as described in Idaho Code Section 39-8106) and through its coordination with other entities and governments and their exercise of independent authorities.

FUNCTIONS

The primary purpose and foundation of the BEIPC's work is to implement the Record of Decision (ROD) for Operable Unit 3 and the Upper Basin ROD Amendment (RODA) for Operable Units 2 and 3 approved pursuant to the federal Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended (CERCLA), and implement/coordinate other plans to address heavy metal contamination in the Coeur d'Alene Basin. Future related RODs issued by the United States Environmental Protection Agency (US EPA), with concurrence from the Idaho Department of Environmental Quality and the Coeur d'Alene Tribe, as appropriate, may be incorporated into the BEIPC work along with other assignments agreed to in MOAs among cooperating parties and governments. The BEIPC 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 BEIPC operational framework.

Key functions of the BEIPC Board are to:

1. Develop and approve its one and five-year work plans;
2. Develop and approve Annual Accomplishment Reports;
3. Coordinate the implementation of its work plans;

4. Appoint an Executive Director to assist the Board in administering its work plans and Basin wide environmental activities;
5. Receive advice from the Technical Leadership Group (TLG) and Citizen Coordinating Council (CCC) on technical, regulatory and public involvement 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 Code Section 39-8106.

MEMBERSHIP

Per Idaho Code Section 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 implementation of the 2002 MOA, 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 to attend and represent the appointing authority at Board meetings in the event the authority's 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 below and as summarized in Idaho Code Section 39-8106(3)).

ORGANIZATIONAL STRUCTURE

Chairperson: The Board shall elect from its own Commissioner 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 from its Commissioner members or appointed Alternates whose term of office shall be two years and who can be re-elected. The vice-chairperson shall serve as chairperson in that person's absence at meetings.

Secretary-Treasurer: The Board shall elect a secretary-treasurer in the same manner as the vice-chairperson. The secretary-treasurer shall serve as the chairperson in the absence of the vice-chair or chairperson at meetings.

Staff Support: To the extent resources allow, the BEIPC Board shall hire and assign staff, including an Executive Director, to provide administrative support to the Board to support its overall deliberations. The staff shall be responsible for making logistical arrangements, distributing agendas and meeting materials up to ten (10) days in advance of a Board meeting, providing for adequate public notice of the meeting and preparing Board meeting minutes. As well, the Executive Director will help arrange opportunities for the Board to interact with the representatives of the CCC and the TLG, and the public. The Executive Director shall consult with the Chairperson in the event the Executive Director is requested to work on special tasks outside normal BEIPC issues.

MEETING SCHEDULE/STRUCTURE

Meeting Schedule: The BEIPC 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 BEIPC jurisdiction. All meetings shall be announced in area newspapers (e.g., the Coeur d'Alene Press, Shoshone News Press, Spokesman Review, St. Maries Gazette) and shall be posted on the BEIPC 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: BEIPC Board meeting agendas shall be developed by the Chairperson and Executive Director (ED), (or staff, if ED is not available). Every effort shall be made to circulate to the Board, the TLG, and the CCC membership and post to the BEIPC website any agendas and meeting information at least ten (10) days in advance of the meeting. All Commissioners shall make a strong effort to identify and notify the Chairperson and Executive Director of any item they wish to include in the proposed meeting agenda twenty (20) days prior to a meeting. All meeting actions items requiring a vote must be noted on the draft meeting agendas as an "action items" posted on the BEIPC website.

Meeting Minutes: The Executive Director shall develop and circulate to the Board and TLG and CCC Chairs for review the Board meeting draft minutes. In accordance with Idaho Open Meeting Law (at Idaho Code 74-201--208) meeting minutes shall include a record of all

Commissioners and BEIPC staff who are present, as well as note of all motions and resolutions proposed and their disposition and the results of all votes. Draft meeting minutes shall be included in the next meeting packet for approval by the Board prior to posting on the BEIPC website and circulated to Commissioners and any other person requesting them. Every effort shall be made to rely on electronic media. All meeting minutes and Commission records shall be archived on the website and in BEIPC records 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 through the Executive Director at any time.

Executive Session: By a two-thirds vote of the Commissioners, the BEIPC may hold an executive session to continue deliberations, as set forth in Idaho Code Section 74-206. No executive session may be held for the purpose of taking any final action or making any final decision other than those allowed in Idaho Code.

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

DECISIONMAKING

Voting: In accordance with Idaho Code 39-8106(4), "the board shall act by majority vote except that the vote of any Commissioner representing 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 BEIPC 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 Board of Commissioners or designated Alternates or the majority vote of the quorum attending a meeting.

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 BEIPC Board meeting. The Chairperson (or vice-chair or secretary/treasurer) 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 and the Executive Director agree to refrain from characterizing the views or opinions expressed by any Commissioner and to exercise comity and appropriate restraint in commenting on the Board's deliberations and processes. Publicly available meeting minutes 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 Organizational Practices 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 a ten (10) day notice.

Note:

(Amended November 10, 2021)

DRAFT

BASIN COMMISSION (BEIPC)

March 10, 2021

MEETING MINUTES

Basin Environmental Improvement Project Commission
Draft Meeting Summary Minutes
March 10, 2021 9:30 AM – Noon
IDEQ Regional Office Osprey Conference Room
2110 Ironwood Parkway, Coeur d'Alene, 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 in person and on WebEx included the following:

Terry Harwood (BEIPC Executive Director)

Commissioners and Alternates present:

Mike Fitzgerald (Shoshone County), Brook Beeler (Washington State), Jess Byrne (IDEQ), Michael McCurdy (IDEQ), Bill Brooks (Kootenai County), Calvin Terada (EPA), Phillip Cernera (CDA Tribe),

Staff present:

Gail Yost (BEIPC, Assistant to E.D., Note taker), Ed Moreen (EPA), Bonnie Arthur (EPA), Dan McCracken (IDEQ), Andy Helkey (IDEQ), Sandra Treccani (Washington State), , Rebecca Stevens (CDA Tribe), Dana Swift (IDEQ), Jamie Sturgess (Kootenai County), Jerry Boyd (CCC)

Call to Order

The meeting was called to order by Executive Director Terry Harwood at 9:30 a.m.

Approve the minutes from the November 18, 2020 BEIPC meeting (Action Item)

Phil Cernera moved to approve the November 18, 2020 meeting minutes; Brook Beeler second, all approved M/S/C

Review and Discuss Draft 2020 Annual Accomplishment Report

Terry presented the annual report of accomplishments made in 2020. This process includes putting together reports submitted from various agencies and how well they have done during the calendar year on projects that were outlined in the approved work plans.

In the first section, Terry summarized work performed through Superfund and other cleanup programs. This included public outreach and citizen involvement thru the CCC, BEIPC, EPA, IDEQ and PHD. The Lead Health Intervention Program was suspended for 2020 due to Covid-19, but did still offer free screenings by appointment – there were 4 children between 6 months and 6 years screened in the Basin, and 2 over the age of 18. PHD plans to resume the program in the summer of 2021.

The Basin Property Remediation Program (BPRP) completed 9 residential properties in the Basin and none in the Box this year. Properties remaining to be sampled and/or cleaned up in the Upper and Lower Basin are those whose owners have refused access, or who have not responded to repeated contact attempts.

The Paved Roadway Surface Remediation Program completed all of the funded work in 2020 – 580 completed segments, leaving only 13 unaddressed roadways. Remedial action completion reports will be produced in 2021 – one for each the Box and the Basin.

A short overview was given on the repositories and Waste Consolidation Areas (WCA's) located in the Box and Basin. These include Big Creek Repository (BCR) and BCR Annex (BCRA), Lower Burke Canyon Repository (LBCR), East Mission Flats Repository (EMFR), Page Repository, East Fork Ninemile Creek WCA and the Canyon Creek Complex Repository and WCA (CCR) – which continued construction in 2020. Phillip Cernera commented on the previous Canyon Creek SVNRT debacle that was done by the State Trustees over 20 years ago – when the Tribe developed their restoration plan they had to go thru a rigorous EIS process that took over seven years. When this original Canyon Creek repository was built, they had to go thru none of this. Now we are having to spend the money to go back and fix with the CCR – why should we be paying for this and how will this not occur again in the future? Terry stated that this was built prior to the 2002 CERCLA action and once EPA took the action for Operable Unit 3 (OU3) and settled with everybody, that shuts down the ability to collect any money from Potentially Responsible Parties (PRPs) for moving this repository under CERCLA. Phillip said the State Trustees pulled this off and it was outside the Superfund site at the time - some kind of Restoration action using their \$4.5M in the 1990's. It created releases of hazardous substances that came to be located downstream in our waterways – if nothing else it has to be a lesson learned that we can't act like this in the future. The CDA Tribe at the time had brought a Natural Resource Damage Assessment and the State Trustees felt like they needed to get up in the basins and do all these cleanups. It completely damaged the data that the Tribe had been collecting to confuse the court that their data was no longer valid. They consolidated waste in the Woodland Park area in a place that the Tribe commented on that was full of springs and resulted in continued release of hazardous substances. Now we will spend millions of dollars out of the Trust to deal with this problem. Terry is confident that this will not happen again and is the best method to take care of the problem.

Terry quickly covered Upper Basin remedies which included cleanup actions in the East Fork Nine Mile Creek and Canyon Creek. He hopes to get these sites on the tour for this year in August. The Basin Commission is involved with the Trust in all their remedial activities – looking at their work, reviewing design documents and assisting EPA in working with local landowners.

The Central Treatment Plant (CTP) and Groundwater Collection System (GCS) reached a significant milestone by starting the one-year O&M period. Andy stated that the State will take over operations in October 2021.

Lower Basin remedies include Gray's Meadow, which is a combination remedy and natural resource restoration. It is a collaborative effort between EPA, CDA Trust and the Restoration Partnership. At Lane Marsh, EPA continued two pilot projects – Incremental Thin Layer Capping (ITLC) and a bench-scale treatability phase to explore the efficacy of biochar amendments. Pilot testing is also planned for the Dudley Reach area - a Draft Riverbed Management Plan is currently under review. Phillip had a question on Dudley Reach, can EPA describe if they plan on doing a combination of dredging/capping or just dredging or capping and Ed answered that he will touch on that in today's presentation.

Terry also gave summaries on other Lower Basin remedies: the State of Washington projects, Recreational Sites and Basin Environmental Monitoring.

In the second section of the Accomplishment Report, Terry started with the Lake Management Plan which was finalized in 2009. In 2019, the Tribe withdrew their support as they determined the LMP

was inadequate as an effective tool to protect water quality in the Lake. In November 2020, the State of Idaho, Kootenai County and EPA sponsored the contract with the NAS to conduct a neutral third-party review of the Lake data and the Tribe supported this action. Phil made a clarification on the Tribe's position as an endorsement of the NAS study and not a sponsor. Lake management accomplishments also included their Science Core Program, Education & Outreach Core Program and Nutrient Inventory & Nutrient Reduction Core Program. Terry commented that something needs to be done on the nutrient loading in the Lake.

The BEIPC and Silver Valley Flood Control Group continued to work with US Army Corps of Engineers (COE) to complete analysis for the SFCDA from Elizabeth Park to Pinehurst. The COE and BEIPC are currently working on preparation of a Flood Map Revision request to FEMA for that reach of the river. The City of Pinehurst requested assistance from the COE to perform a similar analysis of the Pine Creek drainage. Rebecca asked if this would result in a No Rise certificate for Pinehurst from the COE? Terry stated that Pinehurst would be different as they are protected by a levy, but it was not an engineered levy which are the only ones FEMA will accept. They will have to see how this goes. None of this work will not be done under CERCLA, so permitting will be required.

The Restoration Partnership implemented 23 projects in 2020 with the exception of some work being delayed due to COVID-19. All these projects and amounts expended are listed in the 2020 Annual Report along with a brief narrative of work completed.

Public Comment and Input on 2020 Annual Report

Mike opened up for public comments and summarized the edits to be made.

Approve 2020 Annual Report (Action Item)

Phillip Cerna made a motion to accept the 2020 Annual Report with edits, Jess Byrne second, all approved M/S/C

CDA Lake NAS Review Process Update – Jamie Brunner, IDEQ

Jamie Brunner from IDEQ reported last meeting on the NAS scope of work. Since then a committee has been selected for their third-party review of CDA Lake. IDEQ and the Tribe have shared all their data and this committee had their first meetings at the end of February. The first session included an overall introduction of the NAS process, introduction to CDA Watershed and its water quality history. All the sponsors were given time to present to the committee and to clarify their expectations, a brief overview of the LMP and a Q&A and open-mic session. The following day went more into the science, discussion of existing data and remaining questions. She provided a link <https://www.nationalacademies.org/our-work/the-future-of-water-quality-in-coeur-dalene-lake> which shares additional information on the committee and meetings. Laura Ehlers at NAS (lehlers@nas.edu) can be contacted if you would like to get on the email list for future announcements. Our Gem Collaborative is also being used for more local outreach (uidaho.edu/OurGem). The next meetings are scheduled for May, but no set date has been given. The video from the first sessions is available online at the above website. Jamie has a link for the second session, but as of today, it was not loaded on the NAS website.

EPA Discussion on Planned 2021 Work including pilot projects in Lower Basin and update on funding in the CDA Trust – Bonnie Arthur & Ed Moreen EPA

Bonnie Arthur started her portion of the presentation showing a picture of the WCA construction at Canyon Creek from last fall. EPA has many mine and mill sites that they will be working on in the Ninemile Basin. The CDA Trust employed over 220 people in their summer construction season last year, many of whom live in the local communities. She briefly covered the work at the East Fork Ninemile (EFNM) WCA and Interstate Mill Site, which just concluded last summer and was a two year project. A portion of the WCA was capped in 2019 – layered with plastic, rock and clean soil so it can be vegetated. Moving down Ninemile Basin – Bonnie talked about the Tamarack Complex in which they are still working on design and approvals to start construction in 2022 or 2023. This year's field season will have some work going on in the Lower East Fork of Ninemile in the Riparian area from Success Mine down to the junction with Ninemile Creek. It has been divided into two portions, with the first one starting this summer. Test pits are drilled to collect soil samples as part of the design investigative work. Field work sampling is also taking place at Dayrock Complex – with hopes of completing design later this season. It will be combined with the lower part of the EFNM Riparian section.

At Canyon Creek Basin, there have been over 40 mine and mill sites identified for cleanup in the Upper Basin Record of Decision Amendment (RODA). EPA prioritized cleanup at the old SVNRT Repository as it is located directly across from Woodland Park and discharges into Canyon Creek on a daily basis. In 2017, there was a public comment period and they were able to locate a WCA area above the SVNRT Repository. This WCA will hold approximately 500,000 cy of mine waste from SVNRT, and mine wastes from cleanups in Canyon Creek. This is the third year of a four year project – they really appreciate the communities patience with these big construction projects.

The Hecla Star Complex is made up of four mine and mill cleanup sites. It is nearing completion of design – the 60% design has been reviewed and approved and now moving to 90%. This will be the first project after the moving of the SVNRT Repository.

The Tamarack #7 is just starting design work with no major investigation work this summer.

The Blackbear Fraction/Flynn Mine is in its second year of investigative work – crews will be digging test pits and collecting soil samples, drilling monitoring wells and installing soil boreings.

Gem Mine will be a new site starting this summer. It will be a high priority as it is close to residences and recreational areas. The Trust put a temporary cap in some areas using asphalt until remediation can be completed. Standard Mammoth is also a new site for this year.

The Douglas Mine in the Pine Creek Basin is a popular area with heavy recreational use. PHD raised this site to EPA as a priority site to work on. Design work should be finished up this year with work hopefully starting next year.

The Basin Property Remediation Program (BPRP) is substantially complete. There have been over 7,000 yards cleaned up by the State and EPA. Access was granted by those property owners who wished for sampling and/or remediation. The program will stay open for owners who change their mind or properties that change ownership. There is ongoing maintenance for 6 homes with drinking water filtration systems.

Disposal facilities (repositories) are maintained by both the Trust and IDEQ in the Basin and Box for ICP waste program run by PHD, and part of the remedy for the Superfund Site.

Recreational sites combine efforts by the CDA Tribe, PHD, IDEQ, BEIPC and the CDA Trust. One of the big efforts is to continue educating people so that they can recreate in a healthy way. Twelve new signs were put up last summer along the CDA River. A packet of information was also mailed out to property owners along the CDA River and included the updated Our Gem map along with other play healthy brochures. Heavy usage areas along the river - like the boat launches, - are also sampled and information shared among the groups. They are waiting on final approvals to hopefully complete some cleanup work at the Cataldo Boat Launch site.

Bonnie updated the CDA Trust funding information – which was started in 2009 from the ASARCO bankruptcy settlement in the amount of \$437M and currently has \$634M. Each year their annual workplan is budgeted for \$20-24M worth of work in the Upper and Lower Basin. These funds can only be used for Record of Decision selected Basin cleanup actions; cannot be used to fund Box cleanup actions; cannot be used to fund oversight of the CDA Trust; and cannot be used to fund State, Tribe, local governments or other Federal agencies work in the Box or Basin.

Andy Helkey reported on the IDEQ Recreational Sites – the Theater Bridge outside of Smelterville has seen an increase in recreational use with both locals and tourists. A couple years ago PHD identified thru sampling that this site was still contaminated. IDEQ has come up with a design to remove the contamination and cap the entire area. ITD actually owns the property so they will coordinate and come in after remediation to replace the fencing that is in disrepair. It is scheduled for the Spring 2021. Andy also reported on the Smelterville Pond, located by the Shoshone County Airport on State property, and just west of the Theater Bridge project. This is another site that has seen an increase in recreation. In 2019, IDEQ did some sampling – it was cleaned up originally when Smelterville Flats was remediated - some areas now have elevated contamination more than what they would refer to as a remediated property. This Spring, signage will be placed to let people know where and how to recreate safely. IDEQ will also try to alleviate the traffic and parking outside the airport gate by bringing in a road and establishing a parking lot. The new signs will include the history of Smelterville Flats, the hillside revegetation, wildlife and waterfowl in the region, and another with information on the CTP/GWCS and the improvements in water quality. Since it is State owned, it will be put on the O&M schedule and checked regularly. Future funding could maybe see the installation of oasis like on the Trail of the CDA's, possibly in 2022. Phil asked what their thoughts were on recontamination for both sites. Andy replied that the Theater Bridge site is out of the floodplain and was just missed in previous cleanups, so capping will take care of this. Most of the Pond site is in the floodway, a portion will still be in the 100-year floodplain so we will monitor under ICP and watch after floods hit this area by re-sampling.

Ed Moreen updated on the CTP and Lower Basin work for 2021 – the CTP/GWCS contract has now evolved into the one-year O&M period. Tests are being run on both the CTP and the GWCS. Hopefully they will get a good flow of mine water from the Bunker Hill Mine, along with elevated ground water levels to conduct a high flow/high strength test to see how it performs. Last Spring was a gentle run-off with non-typical high water. They are finishing up some construction tasks – final grading, hydroseeding and stabilization.

Gray's Meadow in the Lower Basin – three areas to call out in this project: Lamb Peak Wetland, Cave Lake Wetland and Black Lake. Long-term goals will be to reduce wetland toxicity levels; improve infrastructure and mitigate recontamination risks; convert agriculture land back to wetland habitat to support diverse native plant communities; restore natural structures and processes (depth,

duration and timing of inundation, nutrient cycling); improve water quality in Black Lake; and create public land –provide clean, recreational, educational and cultural opportunities. In 2020, there were wetland and infrastructure assessments – soil samples, geotechnical samples, historical and cultural coordination – and installation of 5 groundwater monitoring wells and 10 piezometers. The path forward – March-May 2021 they will complete Cave Lake field pump improvements by realigning the pump discharge from Black Lake to the CDA River; and winter gravity drain and pump from Lambs Peak field to tie channel and Black Lake to facilitate construction. May-September 2021 they will conduct Cave Lake field tilling studies; complete 60% design; and continue Reed Canary grass control to support remediation/restoration. September-December 2021 the Lambs Peak field pump improvement will be complete, realign pump discharge from Black Lake to CDA River and improve access road.

Dudley Reach in-channel pilot project – located immediately downstream from the Cataldo Boat Launch to Bull Run Bridge. Their focus is on the upper portion, dealing with the worst upstream segment first. The CDA Trust has initiated their planning processes for In-Channel Pilot project. The first order of business is the location - where you want to install and implement the technology ; the second being technology selection (capping, dredging, sills, etc.) something that encourages sediment deposition as opposed to erosion. This will be the first In-Channel work to be kicked off in this very complex basin due to the great range of events that can happen in the channel itself. The schedule is planned to take 4-5 years for ARAR compliance (Cultural Resources, Endangered Species); planning/pre-design data collection/waste disposal; design; logistical planning/access; and implementation. This will all be dependant on site selection and what segment of this multi-mile stretch to start this project. The segment they are focusing on is fairly close to the boat launch at the Mission. Phillip's question pertains to the big loaders in the river (river banks, river bottom), what percentage of contamination is in Dudley Reach compared to the rest of the river. Ed answered that the estimates of contaminated sediment loading is about 15% from the SFCDA River, about 15% from river banks, and remainder comes from the channel itself. We know from previous studies that there is a significant jump in concentrations at mile 159 - the boat launch at the Mission is 160. That is why they are focusing their efforts in this location. Mike Fitzgerald would like to follow up with this as an agenda item for our next meeting, to walk us through the summary on how these different reaches contribute to the river.

Public Comment and Discussion Period

Rebecca asked Bonnie what the monitoring plan was for the Riparian area at the East Fork Ninemile? Bonnie answered that for each project there is a Remedial Action Effectiveness Monitoring Plan, which there are some already in place for those that have been completed. There will also be a Basin-wide Monitoring Plan which will be more detailed monitoring. Rebecca also wanted to know from Ed when the phosphorus data from the GWCS will be available to share. Ed stated they want to get a good data set, and they have only really been operating a couple months. If we can get a year or so and see how the systems operates, we can get a decent set of data to report.

Phil asked Bonnie a question on Canyon Creek, what do they estimate the costs to be on the remedy there? She clarified for all the 45 mine and mill sites – she doesn't have a new estimate. The ROD estimate was 30-40 million, but as we gather more information from the design investigations this will increase. The expense of moving the old SVNRT Repository will be a big process. She can check with the Trust and see if they can provide an updated estimate. Phil also asked her about the Star ponds – if at one point they were going to become future repositories where they would add contamination on top of them or was the waste always going to be put into a WCA's? Bonnie said

they get comments and questions on those ponds because they are right there where all the construction is going on. They are currently operated under Hecla and are not part of the ROD sites – they are outside the current cleanup and no plan to expand into them. Phil said looking upstream from the Star ponds versus downstream – these ponds are on top of where Canyon Creek used to run. Are we getting a flux thru this area and if so, what is EPA's response to resolving this issue? Bonnie answered that the entire area surrounding Canyon Creek is a riparian site under the ROD. They will be looking closely at this on their way thru the cleanups at each of these mine and mill sites. It is factored into the whole basin they are trying to cleanup so that restoration can happen to Canyon Creek watershed and not just each individual site.

Julie Dalsaso addressed the committee and her concerns over the nutrient loading in CDA Lake. She referenced the NAS study from 2005 and quoted "how unclear it is for all the problems to be addressed efficiently and effectively within the constraints that govern the Superfund process". She keeps waiting for the Lower Basin to include CDA Lake, but was pleased with the updated fish consumption advisories and likes the updates given by the EPA newsletter. Julie was also concerned with Phillip's news about State of Idaho's involvement in the SVNRT repository. She briefly touched on the 3 bays on CDA Lake – like Cougar Bay – where there is an active lease for 5 acres of year-round construction and industrial activity for barges. If we are seeing contaminants coming from the lake bottom, we are not effectively using National Academies guidelines from 2005. There should be a remedy, enforcement and buy-in from multiple agencies about this new closed public approach for leases. There are also proposed applications at Powderhorn Bay and Rockford Bay. She realizes there are lots of growth and changes in our area, but she has been attending our meetings for over twenty years and does not see the County or the State supporting the objectives from the last NAS study. We need effective remedies for CDA Lake and not disregard the non-point pollution sources we are allowing.

Jamie Sturgess commented on the river bed, river bank and Lower Basin work schedule. We are making progress in a lot of places other than the Lower Basin, and is concerned with the 4-5 years of additional planning. He believes we are missing a huge opportunity - if the river banks are 15% of the ongoing source, that's different than the 85% from other sources. On the banks that have been stabilized with the NRCS method that have been successful, he has not seen any of the 30-mile stretch where this has failed. He continues to advocate to resume with the river banks to improve this percentage where the contaminated sediments and highly erosive areas are located. If we wait 5 years for the river bed, we could still continue with the banks to stop that new contamination from happening. Jamie proposed that at our next meeting we get an update on the number of miles of riverbed stabilized and schedule moving forward to stop the aggravated river bank problem.

Phillip asked Jamie if the ultimate remedy for the river is going to mean dredging and/or capping, and working on a bank that has already been stabilized, you would probably undermine the toe in which that stabilization is sitting on. To go ahead and do this first would undo the work if the remedy is to remove the contamination in the river bottom. Jamie responded that his first thought would be time value of money and cost. If there is 15% contaminants per year and nothing gets done for 5 years for a pilot – or 10 years for full remediation – that's equivalent of 1.5 years of everything. If we only spent the money to stabilize, we would eliminate in 7 years the equivalent of 1 year of sediment load as estimated presently. He doesn't see where there will be any way to get all this material dredged out. If there is a little re-do in 10 years, he thinks it's a small price to pay if we can stabilize most of it now. Dredging will probably not go so deep as to cause the banks to fall in, that would be aggravating more than remedying. Any possible remedy would probably be from the

present toe of the steep slope to where the wedge starts, which is the area that exposed high water to low water, anything above this wedge should be stable and to remove would cause a major disaster. Natural material is still coming down the SFCDA and natural deposition is keeping some of the sediment stable right below the first mile of the Cataldo Boat Ramp, which is lower contamination ppm than say at the Rose Lake Boat Ramp.

Nomination and Election of new BEIPC Officers, Chair, Vice-Chair and Secretary/Treasurer - Terry Harwood (Action Item)

Nominations for Chair – Phillip nominated Mike Fitzgerald; motion to close nominations by Phillip, second from Brook. All approved **M/S/C**

Nominations for Vice Chair – Mike nominated Phillip; motion to close nominations by Brook, second from Mike. All approved **M/S/C**

Nominations for Secretary/Treasurer - Michael McCurdy nominated IDEQ Director Jess Byrne; motion to close from Mike, second from Phillip. All approved **M/S/C**

The meeting adjourned at 12:08

DRAFT

BASIN COMMISSION (BEIPC)

2022

ANNUAL WORK PLAN

Draft BEIPC Coeur d'Alene Basin Calendar Year 2022 Work Plan

INTRODUCTION

This plan covers proposed environmental cleanup and improvement activities in the Coeur d'Alene Basin scheduled for 2022 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 2022 - 2026 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 Custodial Work Trust (CDA Trust) and Potentially Responsible Parties (PRP).

Part 2 - Other Activities and Responsibilities

Part 1 includes work to implement the Interim Record of Decision (ROD) for Operable Unit 3 (OU-3) and the Upper Basin Interim 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 2005 National Academy of Sciences (NAS) 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 2022 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); 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, and community and recreational areas in the Upper and Lower Basin. 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 2021, the Trust's Basin Property Remediation Program (BPRP) remediated two properties and sampled five including residential, 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 CDA Trust and IDEQ.

The goal for 2022 is to complete sampling and remediation if sampling results are above actions levels on parcels whose owners have granted access. Currently, about 211 properties in the Upper and Lower Basin require sampling and 40 properties require remediation based on previous sampling. A total of 3928 properties in the Basin and 3236 properties in the Box have been remediated at the conclusion of 2021. Nine properties in the Box remain to be remediated once owners grant access.

In 2022, EPA will continue to direct and oversee the CDA Trust 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 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 ($\mu\text{g}/\text{dl}$) to a new "reference value" of $5\mu\text{g}/\text{dl}$. 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 \$50 incentive for children between ages 6 months to 6 years of age residing within the Basin for 2022.

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
- Education and outreach at community events

1.1.3 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: [BUNKER HILL MINING & METALLURGICAL COMPLEX | Superfund Site Profile | Superfund Site Information | US EPA](#)

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 2022, 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 and continue to update and install new signage at identified recreation sites. 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 All in-person and in-home services will be conducted in compliance with COVID-associated protocols.

1.2 REPOSITORY AND WASTE CONSOLIDATION 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 (OU-1 and OU-2).

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 CDA 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 89,922 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 169,461 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 166,560 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 1,040,925 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. At the end of 2020, 518,522 cy of disposal space was available at Page as noted by the year-end survey. Page will continue to receive Box remedial action and ICP waste in 2022.

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

2022 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 2022, 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.

Waste Consolidation Area (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, the Success Complex, the Interstate Millsite, and a portion of the Lower East Fork Ninemile Riparian Area cleanups have already been placed and consolidated at this site.

The EFNW WCA will require expansion to provide capacity for the waste from the other Ninemile Basin source sites (i.e., Tamarack Complex and Dayrock Complex). This expansion will begin in 2022.

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, the OTI design was put on hold to focus on the more immediate needs for repository capacity in Canyon Creek Drainage. In 2015 the CDA 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 was moved in 2021 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 CDA 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.

1.3.1 Upper Basin Remedies

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

The 2012 Upper Basin Interim 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 Operable Unit 2 (OU-2) Phase 2 cleanup to improve water quality in the SFCDR
- 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 2022 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 CDA Trust in the Upper Basin during 2022:

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 is currently underway, and cleanup is expected to begin in 2023.

East Fork Ninemile Waste Consolidation Area: First 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, Interstate Millsite, and the Upper East Fork Ninemile Riparian Area cleanups have already been placed and consolidated at this site.

The EFNW WCA will continue to receive wastes until the remedial actions have been completed for the EFNW drainage, 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 EFNW. Remediation of the upper section of EFNW Creek was completed in 2021. The design for Lower EFNW will be combined with the Dayrock Complex design and will be completed in late 2021. Construction of the Dayrock Complex/Lower EFNW Creek section is scheduled to begin in 2022.

Canyon Creek Basin

SVNRT Repository Remediation and Canyon Complex Repository/Waste Consolidation Area: Similar to the EFNW 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 2022. As part of this work, mine waste from the old SVNRT repository was moved into the new repository in 2021. The new CCR/WCA drainage system will be expanded into the old SVNRT area in 2022. 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 CDA 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 2022, work will continue at the Quarry to produce and haul uncontaminated rock and gravel fill for future use at the CCR/WCA.

Data Characterization and Evaluation: In 2022, the CDA Trust will evaluate data collected during characterization work at the Tamarack #7. Design activities for the Tamarack #7 will be completed in 2022.

Canyon Creek Designs/Investigations: The Hecla Star Mine Complex design is expected to finish in 2022. Design investigations also will continue in 2022 at the Standard-Mammoth Reach Complex and the Gem Complex.

Pine Creek Basin

Douglas Mine and Mill: In 2022, remedial action will be conducted consisting of excavating mine wastes from the outside the perimeter of the existing on-site WCA and consolidating mine wastes on top of the existing on-site WCA for permanent storage. An installation of an adit flow conveyance system from a periodically flowing adit, cover material placement and general backfill, storm water controls, and access deterrents to discourage use from recreational users will also be accomplished.

Central Treatment Plant/Central Impoundment Area

In Kellogg, 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. The Corps of Engineers is responsible for administration and management of this contract. By October 2020, Wood had completed construction and most of the acceptance testing for the Central Treatment Plant (CTP) upgrades and the new Groundwater Collection System (GCS). Wood has continued to operate the system for one year under contract and has completed additional seasonal testing during this shakedown period. In October 2021, IDEQ assumed operations and maintenance of the CTP/GCS using

Hecla settlement monies that had been placed in a Registry Account Fund for the purposes of performing mine impacted water collection and treatment.

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, 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 must 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 was 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 ranged 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.

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, riverbanks, splay areas, riverbed 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 2020, documentation for the working sediment transport model was finalized and EPA used the model and all available data to complete a Draft Riverbed Management Plan (RMP), currently under review. The purpose of the RMP is to guide the interim remedy for the Lower Basin riverbed and banks by providing information and analyses for selected integrated remediation scenarios for the riverbed and identifying high-priority riverbank segments for removal or stabilization. The RMP targets areas within the channel for active remediation and divides the riverbed into sediment management areas (SMAs), evaluates the effects of remedial technologies, and identifies areas for natural recovery; the RMP will feed into a broader Lower Basin Prioritization Plan (LBPP) that is also under review. 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 under the LBPP. 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 and LBPP, EPA will continue to coordinate with the Restoration Partnership and various landowners in 2022 to characterize and identify off-channel areas for remedial actions. Research will also continue in Lane Marsh and other wetland areas to study the effect of thin-layer capping techniques, amendments and water levels on lead bioavailability. Currently, EPA is finalizing the 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. The 60% Design for this agriculture to wetland conversion project will be available for agency review in December 2021 and construction is scheduled to start in 2022 and continue through 2023, following completion of the final design. Two important infrastructure projects associated with Gray's Meadow were completed by the end of 2021: 1) relocating the Cave Lake discharge point from Black Lake to the CDA River (completed in March 2021); and 2) relocating the Lamb Peak pump discharge from Black Lake to the CDA River, widening the access road and replacing the vehicular bridge (completed in December 2021). During the agricultural land use period, nutrient-rich water from Gray's Meadow was discharged to Black Lake, affecting water quality in the lake. Relocating the water transfer locations, remediating the soil, and improving processes for managing water levels at is expected to improve water quality in Black Lake and throughout the watershed.

To address contaminated sediment transport in the CDA River channel, the CDA Trust has begun planning and remedial design characterization for an in-channel pilot project to be implemented in the upper part of the River's Dudley Reach. The exact location may be adjusted or the technology may be modified, through adaptive management, as new information is obtained. Currently the focus area is an approximate one-half mile scour hole located about two miles downstream of the Mission Boat Launch (near River Mile 157). The Dudley Reach is considered the most significant upstream lead loading segment in the River system. The technologies to be constructed are a cap/dredge hybrid. Unarmored riverbanks adjacent to the pilot segment will be addressed along with the pilot project. The pilot will help inform future approaches to cleaning up mine waste in the river channel and allow evaluation of methods to prevent mine waste from moving downstream while getting some cleanup done.

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.

Future remedial work in the Lower Basin is planned on being supported through the design and construction of Waste Consolidation Areas (WCA). The WCA is similar to the Upper Basin repositories in that it will undergo strict engineering design to prevent the release of held contamination to surface and groundwater as well as prevent release to the air. Once closed, a WCA will also follow a designed operations and maintenance plan which will include monitoring for contaminant release. While the WCA is similar to a repository, notable differences include:

- 1) The WCA is to be placed in close proximity to the project site in order to support remedial technologies chosen, reduce transportation costs, and decrease impacts on local communities,
- 2) The WCA will remain in operation until the project waste capacity is reached, be secured, undergo the prescribed operations and maintenance plan, and be and monitored into perpetuity,
- 3) The WCA will only accept waste from the specific project and will not take on ICP or other project wastes.

During 2021, two CDA Trust-owned properties underwent geotechnical evaluations and surveying in consideration for a potential future WCA site. The WCA would support the waste disposal needs of the Lower Basin Dudley Reach Pilot Project(s). A site, when chosen, would begin remedial design in 2022 and began construction in 2023 in order to support the 2024 Lower Basin Pilot Project(s) start date.

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.

Highlights of the data collected through the BEMP are in the 2020 Five Year Review (9/2021). More details are included in the USGS 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 remedy, they are important to the health of the Coeur d'Alene River watershed. Annual USGS surface water sampling results for 2020 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 2020: <https://semspub.epa.gov/work/10/100312601.pdf>.

In 2020 and 2021, EPA worked with the CDA Trust, IDEQ, USFWS, USGS, and the CDA Tribe to update the Basin Environmental Monitoring Plan in order 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], 2021).

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 and the Area-wide Remedial Action Effectiveness Monitoring Plan for Ninemile Basin were distributed for broader review and revision throughout 2020 with finalization anticipated in 2021. A BEMP workgroup meeting was reestablished in 2021, with plans for annual meetings during field planning season to effectively coordinate and communicate BEMP activities across agencies/organizations.

Construction of the Groundwater Collection System (GCS) adjacent to the CIA in Kellogg, was completed in October 2020 and following a year of operation by EPA's contractor, operation of the GCS and upgraded Central Treatment Plan (CTP) was transferred to the IDEQ in October 2021. Preliminary data for RA Effectiveness Monitoring for the GCS was collected during baseflow conditions in fall 2020 and during high flow in spring 2021. 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 fall 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) were completed by the end of 2020: Interstate Callahan 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 was addressed in 2021.

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 CDA Trust; the State of Idaho; local governmental jurisdictions or parties who are required to perform O&M activities by judicial or administrative settlement, environmental agreements, covenants, and conservation easements such as projects constructed under the Remedy Protection and Paved Roads Programs 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 Coeur d'Alene Lake in the Selected Remedy. The OU-3 Interim ROD anticipated that the State, Tribe, federal agencies, and local governments would implement a Coeur d'Alene 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 lakebed contamination is deferred contingent upon successful management through the LMP. The LMP's goal is to manage metals in contaminated lakebed sediments through reduction of nutrient inputs basin-wide from point and nonpoint sources. The LMP includes actions related to lake water quality monitoring, coordination among basin stakeholders, education and outreach, and identification of funding sources for lake management efforts.

As of the summer of 2018, the Coeur d'Alene Tribe asserted that the LMP is inadequate, in itself, as an effective tool to protect 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 initiated a third-party review of lake management data by the National Academy of Sciences (NAS) in 2020 to help inform an appropriate response to undesirable water quality trends. A final report from NAS is expected in 2022. IDEQ staff continue to operate under the LMP as discussions with the Tribe and EPA continue and the third-party review 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.
2. Establish and Strengthen Partnerships to Maximize Benefits of Actions under Existing Regulatory Frameworks.
3. Finalize 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 LMP goal, objectives and strategies.

In 2022, 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. Provide support to NAS to facilitate the third party review of lake data
3. Develop modeling objectives to guide selection of appropriate tools for lake management (utilizing NAS recommendations)

Nutrient Reduction and Implementation (LMP Objective 3)

1. Work with funding recipients for the Building Idaho's Future initiative for phosphorus reduction in Coeur d'Alene Lake to develop contracts and ensure successful project implementation
2. Work with BIF applicants that were not funded to identify other potential funding sources and assist in further project proposal development, where needed
3. Continue lake tributary monitoring initiated in 2019 to fill gaps in nutrient loading data identified in the nutrient inventory report
4. Share relevant data gap monitoring results with stakeholders to aid in decision-making and potential project ranking
5. Continue to collaborate on water quality improvement efforts in the Coeur d'Alene Basin with the Coeur d'Alene Lake Advisory Committee, Restoration Partnership, AVISTA Corporation, the Natural Resource Conservation Service (NRCS), the Soil & Water Conservation Districts, Counties, Cities, and others
6. Identify opportunities to align nutrient reduction and remedial efforts in the Lower Basin.
7. Continue implementing aquatic plant surveys within the northern lake

Increase Public Awareness (LMP Objective 4)

1. Continue to partner with Coeur d'Alene Tribe, University of Idaho (UI), CDA Vision 2030, Coeur d'Alene Regional Chamber of Commerce, and other stakeholders to share information with the basin-wide community through the Our Gem Coeur d'Alene Lake Collaborative
2. Continue to participate in The Confluence Project to support Basin high schools by providing workshops and guidance for teachers and students involved in field-based watershed science
3. Partner with UI, Coeur d'Alene Tribe, and area high schools and 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 their 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 an EPA approved Quality Assurance Program Plan (QAAP) the Coeur d'Alene Tribe retracted their support of the LMP in 2019, as an adopting government. Declining water quality, as well as a myriad of other concerns prompted the Tribe's retraction of support. The Tribe detailed their concerns about LMP effectiveness in a written critique. 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 2022, the Tribe will conduct the following activities outside of the LMP process:

- Continue to improve scientific understanding of lake conditions through monitoring and modeling of 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 monitor aquatic plant communities in the southern lake.
- Tribal staff will continue to work with EPA to identify potential opportunities to align nutrient reduction and remedial efforts in the Lower Basin through modeling and coordination.
- Provide updates to the draft Lake Status Report to the TLG for feedback prior to distribution to the BEIPC.
- Identify nutrient reduction projects along tributaries with assistance from stakeholders.
- Tribal staff will continue to partner with the University of Idaho-Community Water Resource Center (U of I CWRC), CDA2030, PHD, 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 addressing 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 2022. This program recognizes businesses and organizations that are taking action to protect basin water quality.
- The Tribe will continue to engage with and provide data to the NAS for their 'Status Review and Analysis of Coeur d'Alene Lake Water Quality' through Fiscal Year 2022.
- 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 and Pine Creek. During 2022 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) to complete 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 2022. 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 2022, 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 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 2022:

- As required, 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 a consortium of the Coeur d'Alene Basin Natural Resource Trustees, comprising 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 2022.

- Conservation Easements along the Coeur d'Alene River corridor by the USFWS.
- Management 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 and modeling by the Coeur d'Alene Tribe.
- Wetlands restoration planning and implementation at Grey's Meadow along the Lower Coeur d'Alene River by IDFG. This is a joint project with EPA conducting the remediation and the Restoration Partnership conducting the natural resource restoration with IDFG as Trustee Sponsor.
- Gene Day Pond Public Access Improvements with the Shoshone County Sportsman Association and sponsored by IDFG.
- 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 Bay Preserve Wetlands Enhancement and Stream restoration with BLM as the primary sponsor with assistance from USFWS.
- 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.

In 2022, there will be ongoing coordination with EPA and the CDA Trust on 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)

2022 - 2026

FIVE YEAR WORK PLAN

Draft BEIPC Coeur d'Alene Basin Five-year (2022-2026) Work Plan

INTRODUCTION

This plan for calendar years 2022-2026 covers environmental cleanup and improvement activities in the Coeur d'Alene (CDA) 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, 2022-2026. 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 2002 Interim Record of Decision (ROD) for Operable Unit 3 (OU-3) and the 2012 Upper Basin Interim 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 2005 National Academy of Sciences (NAS) 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 Custodial Work Trust (CDA Trust) over the five-year period, 2022-2026. The 2022-2026 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 Interim RODA.
- Remedial actions and/or Pilot Projects in the Lower Basin and risk reduction activities associated with recreational areas.
- Basin Environmental Monitoring (BEMP)
- 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.	IDEQ EPA CDA TRIBE PHD

PROPOSED ACTIVITY	SCOPE	OBJECTIVE	* LEAD AGENCY
Lead Health Intervention Program (LHIP)	<p>The Panhandle Health District (PHD) administers the LHIP which provides a variety of services to prevent elevated blood lead levels in children and others living or recreating within the Bunker Hill Superfund site. These services include education and awareness about the risks associated with lead contamination and annual voluntary blood lead screenings. The purpose of blood lead screenings is to identify children with elevated blood lead levels and provide in-home follow-up services from a public health professional to identify sources of and ways to reduce lead exposures. Information from blood lead screenings provides the PHD with valuable information on the effectiveness of the LHIP, as well as other site cleanup programs such as interior house dust monitoring, yard remediations, and the Institutional Controls Program (ICP). The goal of each of these programs is to prevent lead exposures that could result in elevated blood levels. Community and area-wide results are made available to the public.</p>	<p>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.</p>	<p>IDEQ PHD</p>

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) continued development and use of the Canyon Complex WCA and Quarry for remedial actions in Canyon Creek drainage; the siting and development of WCAs in the Lower Basin for implementation of remedial actions there.	Continue operation at BCR, BCRA and LBCR for Upper Basin remediation and the Institutional Controls Program (ICP). Continue operation at EMFR for remediation and ICP in the Lower Basin. Continue operation and expansion at Page to accommodate ICP wastes in the Box. Continue to utilize the WCAs in East Fork Ninemile and Canyon Creek for specific site remediation. Continue implementation of the Waste Management Strategy 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 and WCAs. Continue to 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 upgraded Central Treatment Plant (CTP) in the Box to accommodate mine-impacted 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.	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 CDA Trust with Restoration Partnership (RP)

PROPOSED ACTIVITY	SCOPE	OBJECTIVE	* LEAD AGENCY
Lower Basin Remedies	<p>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 to address contaminated riverbed source areas 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. Characterize and prioritize additional riverbank segments for stabilization. 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.</p>	<p>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 management plans (Lower Basin Prioritization Plan and Lower Basin Adaptive Management Plan) that target areas for active remediation over the next 3 to 5 years, evaluate the effects of remedial technologies, and identify areas for natural recovery. Utilize the Lower Basin PFT process to evaluate multiple objectives for source control, clean up of channel habitat, and protecting human health. 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 with the goal of addressing riverbed mine waste source areas and reducing the downstream transport of lead and other mine waste contaminants. A ROD Amendment or Explanation of Significant Differences (ESD) may be necessary if additional actions are deemed necessary to address riverbed source areas.</p>	EPA with State and Federal agencies, CDA Tribe, and RP

PROPOSED ACTIVITY	SCOPE	OBJECTIVE	* LEAD AGENCY
Lower Basin Remedies (continued)		<p>Plan and implement habitat area design and remediation (including treatability studies for soil capping and amendments) and river bed pilot projects.</p> <p>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.</p>	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.		

10/22/21

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.
- Generally, operation and maintenance for remedial work performed by the Coeur d’Alene Custodial Work Trust (CDA Trust) is the responsibility of the CDA Trust. However, there are exceptions such as with the roads and remedy protection projects. Other project examples where the CDA Trust will not be taking on long-term O&M include Gray’s Meadow where Idaho Department of Fish & Game will take over O&M after the first five years.
- Operation and maintenance of the Central Treatment Plant and Ground Water Collection System in Kellogg are the responsibility of the State of Idaho for the life the registry funds from the Hecla settlement.
- 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 Administered 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 lakebed sediments through reduction of nutrient inputs basin-wide from point and nonpoint sources. The LMP includes actions related to lake water quality monitoring, coordination among basin stakeholders, education and outreach, and identification of funding sources for lake management efforts.

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, Kootenai County and EPA have initiated a third-party review of lake 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 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 2022-2026

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	Support the NAS as their third-party review of lake data continues	Objectives 2, 3, 4	IDEQ CDA Tribe NAS
Science reporting	NAS report will be presented 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 monitoring in lake tributaries will continue in order to fill data gaps identified in the nutrient inventory report. Results will be shared with stakeholders to inform decision-making	Objectives 1, 2, and 5	IDEQ
Bank erosion inventory	Bank erosion inventories will be updated as appropriate.		IDEQ AVISTA SWCDs

10/22/21

Implementation coordination	Continue to collaborate with the Coeur d'Alene Lake Advisory Committee, Restoration Partnership, AVISTA Corporation, the Natural Resource Conservation Service (NRCS), the Soil & Water Conservation Districts (SWCDs), Counties, Cities, and others to identify water quality improvement projects	Objectives 2 and 5	IDEQ CLAC RP CDA Tribe AVISTA NRCS SWCDs
Aquatic Invasive Species	Continue implementing aquatic plant surveys. Identification of invasive species will be reported to AVISTA Corporation and Idaho State Department of Agriculture 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. Utilize Building Idaho's Future projects for public outreach opportunities.	Objectives 2 and 3	IDEQ CDA Tribe SWCDs Stakeholders
Our Gem Collaborative	Participate in the Our Gem CDA Lake Collaborative education subgroup to share information and get feedback from the basin-wide community	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) to implement 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

10/22/21

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.

BEIPC, PHD AND IDEQ OUTREACH REPORT FOR JANUARY – OCTOBER 2021

IDEQ, PHD:

- Assisted the Confluence Project with Snow Science Field Trips at Lookout Pass. High Schools who participated included: Wallace, Lake City, Lakeland
- Conducted an online ICP course for the University of Idaho's Annual Safety Fest (this event was held online only due to COVID-19 restrictions)
- Conducted the ICP class for Kootenai Electric
- Presented to new Nurse Practitioner for Panhandle Health District
- Restocked Play Clean Brochures in local laundromats and other public locations
- Attended Idaho's Lead Advisory Committee Meetings, gave updates on outreach, events, and future activities
- Attended Kootenai Shoshone Conservation District Meeting
- Presented to Environmental Science students at Coeur d'Alene High School
- Presented for the West Valley Outdoor Research Center via Facebook Live
- Arranged for Public Service Announcements from May 3 to August 29, 2021, three times a day on KPND-KTPO-FM, KICR-KIBR-FM through Blue Sky Broadcasting and twice a day on KXLY and KZZU through KXLY Radio Group
- Assisted The Confluence Project at Lake City High School to prepare for the Youth Water Summit
- Superfund Site Tour for Environmental Health Specialists from PHD
- Presentation on site history and ICP to Silver Valley Realtor's Association
- Attended Silver Valley Chamber meeting to give updates on 2021 remedial activities
- Put together 900 SWAG bags and distributed to 9 schools throughout the Silver Valley and Medimont
- Put together mailer on behalf of the Rec Site Group for the lower basin properties located near/on beach fronts
- Lead a Coeur d'Alene High School Field trip to the Silver Valley
- Assisted with the Youth Water Summit
- Presented to Wallace High School
- Attended Health Services Advisory Committee Meeting/Mountain States Early Head Start and NIC Head Start
- Kootenai Environmental Alliance Superfund Site Tour
- Attended PHD Health Promotion/Nutritional Services Meeting, gave updates on outreach and events
- Hosted Booth at the Kellogg Community Market
- Hosted Booth at Silver Hoops 3 on 3 Basketball tournament in Kellogg
- Advertised and put together informational bags for Panhandle Health District's Annual Blood Lead Screening Event
- Set up a booth at the North Idaho Fair. The booth was unmanned this year, so replenished it daily with materials for the public.
- Provided nailbrush, lunch containers and Health Living in the Silver Valley brochure for Shoshone Medical Center Kid's Health Fair bags
- Provided bags for new and existing tenants at The Canyon Side Apartments in Burke and each child living in the complex
- Provided bags to include with boxed food provided by the Community Action Network (food bank) in Kellogg

- Water quality field trip with The Confluence Project for Timberlake High School, Kellogg High School, and Lakeland High School science students
- Water quality and Bunker Hill Superfund Site field trip with The Confluence Project for Coeur d'Alene High School and Wallace High School science students
- Provide the WIC program with customized information about raising a child in the Bunker Hill Superfund Site Safely
- Presented to Local Realtors based out of the Silver Valley
- DEQ and PHD were guests on North Idaho News Podcast
- DEQ, PHD, and Hecla staff presented on remedial work, ICP, and mining in the Silver Valley for CDA Leadership Day
- Presentation for SEEP on upgrades to the Central Treatment Plant, Groundwater Collection System, and DEQ's takeover of Operations and Maintenance
- Site Tour with Senator Crapo's staff
- Posted flyers for EPA's summer work in Canyon Creek, Nine Mile Basin, Theater Bridge Area Cleanup (DEQ lead), Douglas Mine and Mill Site, Trucks Hauling to Lower Burke Canyon Repository, and the Canyon Complex Repository/Waste Consolidation Area.
- Disbursed Basin Bulletin and EPA project updates throughout site. EPA released three Basin Bulletins in FY 2021: November 2020, March 2021, and July 2021.
- Provided brochures and information at the Cataldo Mission State Park Visitor Center

BEIPC:

- ED assisted EPA Region 9 on questions concerning a mine site environmental cleanup in California and Nevada he worked on while a federal official.
- ED met with South Fork Sewer District on District Issues.
- ED assisted IDEQ Director on an update of Site work with State Legislators.
- ED met with Kingston/Cataldo Sewer District on their proposal for new treatment process and request for assistance.
- ED met with Senator Crapo's staff and took them on a tour of work in East Fork Nine Mile and Canyon Creek drainages.
- BEIPC Executive Assistant assisted IDEQ Director's Office in making arrangements for IDEQ Board Tour that was later cancelled.
- ED provided East Side Highway District with BEIPC LIDAR data for a proposed bridge replacement project in Cataldo.
- ED continued to assist Local Flood Group in their FEMA Flood Mapping change request.
- ED attended two Four County Natural Resources Committee meetings in CDA to update them on Site work and issues.
- ED met with citizens with concerns over Basin work and condition of CDA Lake.