

BEIPC Coeur d'Alene Basin Calendar Year 2012 Work Plan

INTRODUCTION

This plan covers environmental cleanup and improvement activities in the Coeur d'Alene Basin scheduled for CY 2012 by the Basin Environmental Improvement Project Commission (BEIPC) and responsible coordinating agencies in accordance with their responsibilities as stated in the Memorandum of Agreement (dated August 2002). Actions noted in the plan are intended to implement the goals and objectives of the BEIPC's 2012-2016 5-Year Work Plan. This plan has been prepared by the Technical Leadership Group (TLG) and the Executive Director with review by the Citizen Coordinating Council (CCC), and is based on recommendations for activities and work to be performed in CY 2012. The work plan for 2012 is organized as follows:

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

Part 2 - Other BEIPC Activities and Responsibilities

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

Part 2 includes work and responsibilities the BEIPC has assumed based on recommendations from the National Academy of Sciences (NAS) Study and requests from the State of Idaho and citizens and communities of the Basin.

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

PART 1 – ENVIRONMENTAL CLEANUP WORK

Funds made available through EPA's CERCLA program are available for environmental remediation on privately owned lands and state, county and local government owned properties. Funds obtained through EPA's CERCLA program cannot be used for cleanup of sites on public (Federal) land. Work proposed on public lands is the responsibility of the federal land management agencies. The State of Idaho is supplying program support and funding through the Idaho Department of Environmental Quality (IDEQ) for environmental cleanup activities.

For Part 1, the scope of the proposed work corresponds to the level of funding and the funding sources anticipated for CY 2012 and work anticipated to be performed by any responsible parties. The proposal includes the following work:

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

1.1 REPOSITORY DEVELOPMENT AND MANAGEMENT

Background

Repository development and management is an ongoing process that must meet the demand for historic mining related contaminated waste disposal for the entire Coeur d'Alene Basin environmental and human health related cleanup program. This includes the Basin Property Remediation Program (BPRP), other cleanup actions performed by EPA, the Natural Resource Trustees, and responsible parties performing cleanup under administrative agreements with EPA and IDEQ. It also includes waste generated by private parties under the Institutional Controls Program (ICP). Without new repositories, continued cleanup and control of contamination is compromised and potentially stopped. The effort is coordinated through the BEIPC.

There are two operational repositories within the OU-3 area, the Big Creek Repository (BCR) and the East Mission Flats Repository (EMFR). The BCR is located at the mouth of Big Creek Canyon and currently serves the Upper Basin. The BCR has been receiving waste since 2002. In 2011 an expansion plan was completed and implemented that added about 116,000 cubic yards (cy) to the existing capacity, bringing the total capacity of BCR to about 616,000 cy.

During the 2011 season, BCR received approximately 34,000 cy of contaminated waste. Since opening in 2002 the BCR has received approximately 489,000 cy of waste material, over 79% of the 616,000 cy revised design capacity.

The EMFR is located north of Interstate 90 near Exit 39. Construction at EMFR commenced in August 2009 and waste disposal continues at this site. During the 2011 season, EMFR received approximately 28,000 cy of contaminated waste. In over two years of operation EMFR has received approximately 68,000 cy of waste material, about 17% of the total waste soil capacity at this facility.

Objectives

The Repository Work Plan centers on three objectives: (1) operations at BCR and EMFR; (2) increasing repository volume in the Upper Basin; and (3) revision of the Waste Management Strategy (WMS). Specific tasks to achieve these objectives are summarized below:

Repository Operations

With both EMFR and BCR open to receive waste, the BPRP will include both Lower and Upper Basin property remediation in the 2012 field season. Based on past BPRP productivity rates, an estimated 50,000 to 70,000 cy of waste material could be generated by the BPRP in 2012. Additionally, ICP waste volume projection for next year is estimated to be as high as 7,000 cy combined for both BCR and EMFR (based on 2010-2011 averages).

Anticipating that need, the repository operations include but are not limited to the following tasks: receiving and placement of cleanup and ICP waste soils at a rate comparable to 2011; and segregation and appropriate placement or disposal of non-soil waste associated with remediation activities. These non-soil waste materials include such items as wood and root wads, concrete, asphalt and miscellaneous demolition debris. Other tasks associated with repository operations include: equipment decontamination, site stabilization, erosion and sediment control installation, and surface and ground water monitoring and associated reporting.

Increasing Upper Basin Repository Capacity

New repository capacity will be needed to contain waste generated by cleanups identified in the 2002 OU-3 ROD and the forthcoming Upper Basin ROD Amendment, which will focus largely on cleanup activity at large-volume contaminant source areas such as inactive mine and mill sites and alluvial floodplain deposits.

The Upper Basin ROD Amendment will adopt a two-part approach to waste management that utilizes both waste consolidation areas (WCAs) and repositories. The emphasis in the mine and mill cleanup work will be to store waste in WCAs located at or within the immediate vicinity of the old mine and mill sites. These are generally located in the upper reaches of the tributaries of the South Fork Coeur d'Alene River. Siting, design and construction of the WCAs will be performed as part of the mine and mill site cleanups that are anticipated to be performed by the CDA Trust.

The alluvial sources identified in the ROD Amendment could generate over one million cy of waste in the South Fork Coeur d'Alene River valley. These wastes are targeted for disposal in repositories and are expected to be generated after priority mine and mill site and other cleanups are performed. A repository siting process driven by public input has identified two new repository sites to support cleanup activities in the Upper Basin, the Osburn Tailings Impoundment (OTI) area, and the Star Tailings Impoundment (STI)

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area. Baseline site characterization data have been collected at both new sites and design for the OTI proceeded in 2011. A 30% Design Report was completed for the OTI site in late fall 2011. Due to a change in remedial project planning from the ROD amendment process, the OTI design will be shelved for the near future and design development work will begin at STI in the 2012 calendar year.

The repository design program is a dynamic process driven by many factors, including waste stream volume estimates, priority cleanup site locations, and funding availability. As cleanup implementation plans are finalized and waste stream volume generation schedules are developed, repository designs, technical evaluations, and property acquisition will proceed at the repository site (either OTI or STI) best located to serve the cleanup program in the 5 year planning period.

Repository designs will be shared with the public and made available for comment so that input that results in design changes will be incorporated and reflected in a subsequent design stages. In other words prior to taking a 30% design to a more complete design stage, it would be made available for public review and comment.

Waste Management Strategy Revision

The WMS is a key document that guides repository siting. It contains future waste volume and schedule forecasts within geographic areas. The WMS will be updated to incorporate additional information regarding the status of OU-3 remedial activity and repository needs identified in the upcoming ROD Amendment. The revised WMS will be developed jointly by IDEQ and EPA and in coordination with the Repository Project Focus Team (PFT). The WMS revision will depend on completion of the ROD Amendment and finalization of implementation plans and cleanup priorities, addressing this task will be initiated after issuance of the final Upper Basin ROD Amendment and availability of other information as described herein.

1.2 HUMAN HEALTH ISSUES

Remediation of human health exposures is a remedial action priority as defined in the OU-3 Interim ROD. It includes maintaining the ICP and conducting cleanup in residential, community and recreational areas. The ROD also identifies mine and mill sites that represent risks to human health. The Upper Basin ROD Amendment will address human health, remedy protection and ecological remedies when approved.

1.2.1 Residential and Commercial Property Remediation

In 2011, the Basin Property Remediation Program (BPRP) remediated approximately 211 properties. This is a lower number than in 2010 and previous years. However, the average property size increased. This resulted in approximately 3.0 million square feet being remediated. The lower number can also be attributed to a very wet spring and the need to provide dry waste material that met structural requirements for construction of the toe of the north repository expansion at BCR.

During 2012, IDEQ plans to remediate approximately 250 properties with the BPRP. The properties will be located throughout the Upper and Lower Basin and will continue the trend of being larger than properties remediated in the past. Assuming sufficient funding is available, IDEQ's goal is to remediate about 3 million square feet of property during the 2012 construction season. During the spring and fall, properties located in the Lower Basin will be targeted. High risk properties will continue to be the top priority for remediation and IDEQ expects about 6% of the properties will be classified as high risk. High risk properties are those properties where children less than 7 years of age or pregnant women reside.

In 2012, IDEQ plans to sample approximately 150 property addresses. Based on current estimates, there will be approximately 100 property addresses remaining to be sampled in 2013. The majority of the property sampling effort is planned to be completed by the end of 2013. Presently, there are a total of 205 properties where owners have refused to provide access for sampling. These properties still need to be sampled at some point in the future to determine the need for remediation.

Also to be implemented in 2012 is a program to address the unpaved (gravel and dirt) roads in the site from Harrison to Mullan that pose a risk to human health because of surface or sub-grade heavy metal contamination. Many of these roads surfaces serve as barriers to contamination and the condition of the surface and potential level of contamination needs to be determined. IDEQ and EPA are performing an ongoing evaluation program to determine the conditions of unpaved road surfaces and potential contamination. After completion of this evaluation in 2012, a program will be established to remove and replace contaminated surfacing or cap contaminated surfacing to ensure that there is a remedial barrier to exposure and movement of heavy metal contamination resulting from road traffic and storm water runoff on unpaved roads. This new program is included in the BPRP.

The health and safety of the public, staff, contractors, and consultants is an important component of the remediation program. That component will continue to be emphasized during the 2012 program.

1.2.2 Blood Lead Screening in Children

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

The blood-lead screening program will continue in 2012. The agencies are still considering ways to improve participation in the program. The program may be modified in 2012 based on the evaluation of ideas generated at the 2010 community workshop and

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conversations with federal and state health agencies. Information about modifications to the program will be provided to the BEIPC prior to implementation.

1.2.3 Recreation Use Activities

The OU-3 Interim ROD includes remediation of Lower Basin recreational use areas to reduce human exposure to lead and other metals. Some priority recreational use areas were identified in the ROD with the understanding that other recreational areas will be evaluated for cleanup based on factors such as risk of exposure, location, and use.

In 2010, the TLG decided to move the work from the Recreation Areas PFT to the Lower Basin PFT. This transfer is to better connect the recreation areas work with the ecological remedy, work on sediment transport and recontamination in the Lower Basin, and natural resource restoration work. The remediation and development principles identified by the Recreational Area PFT (below) remain appropriate for the 2012 work plan:

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

2012 Tasks

Specific tasks for this coming year have not been completely identified or developed by the Lower Basin PFT but will more fully explored and discussed by the PFT and could include:

1. Work with the Communications PFT to identify what else can be done to make recreation users aware of human health risks along the river corridor and to further educate people on how to minimize any risks. Will explore value of a recreation user survey gauging the areas of interest and knowledge of preexisting conditions on recreational sites.
2. Work with Panhandle Health District and IDEQ on Riley Raccoon Recreation Campaign. Review and comment on the creation of various characters which will focus on exposure pathways and sources and assist Riley Raccoon when messaging about how children can take measures to prevent getting exposed,

or how to stop the re-introduction of contaminants by maintaining healthy habits. Our target area is the Coeur d'Alene River Basin where people recreate.

3. Collaborate with other agencies on creation of additional "clean" areas for people to recreate.
4. Work with Off-Road Vehicle (ORV) groups in spreading the message about safely recreating in the Basin.
5. The USFS has identified the Medimont Boat Launch as a priority for rehabilitation and modification to minimize direct contact with sediments contaminated with lead and other heavy metals that result from Coeur d'Alene River flooding. The USFS has identified hard surface parking area and boat launch as must have items in this rehabilitation. On July 7 and August 17, 2011, the Lower Basin PFT recommended this project to the TLG and the BEIPC Board. Work components are currently planned to include: paving the access road and parking area, rehabilitation of the boat launch and installation of a dock, decommission and access control installation at undesignated recreation/camping areas at the site where there is potential for recontamination, and signage installation. The BEIPC supported this project and requested the TLG to work with the USFS to investigate alternative funding opportunities for construction of this project. Design work is being completed in 2011 and if adequate funding is available this project will be constructed in 2012.

1.2.4 Remedy Protection Projects

Remedy Protection is a significant category of work in the current Proposed Implementation Plan and is a high priority in the Upper Basin ROD Amendment Implementation Plan. The objective of this work is to protect the installed human health related remedy from recontamination and scouring caused by heavy precipitation and tributary flooding. The 2012 BEIPC work plan will include initiation of remedy protection projects. Once the Upper Basin ROD Amendment is signed and performance of associated future O&M has been secured, work will begin on a remedy protection project or projects included in the Amendment. The selected remedy protection project(s) will provide a high degree of protection to installed human health related barriers to contamination based on a prioritization to be conducted by IDEQ and EPA. The amount of work completed in 2012 will depend on when the Amendment is signed and the project(s) selected. The 2012 work will most likely be pre-design and design with the possibility of construction in 2012. Once the ROD Amendment is approved, a BEIPC Annual Work Plan amendment is anticipated to address approved work for 2012.

1.3 ENVIRONMENTAL REMEDIATION ISSUES

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

1.3.1 Upper Basin Remedies

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

During 2010, an Upper Basin Focused Feasibility Study (FFS) was developed to support release of the Proposed Cleanup Plan for implementation of an Upper Basin ROD Amendment. After a ninety-day extension, the comment period on the Proposed Cleanup Plan ran until November 23, 2010. During 2011, EPA worked on responses to comments on the Proposed Plan and changes to the FFS based on comments received. The selected remedy will be documented in a ROD Amendment which is expected to be issued by EPA in late 2011 or early 2012. Additional information about the ROD Amendment for the Upper Basin and prioritization of cleanup actions including technical memos, meeting presentations, and community involvement documents are present at the following web site: <http://yosemite.epa.gov/R10/CLEANUP.NSF/sites/bh+rod+amendment>

In coordination with the development of the ROD Amendment, a priority setting process has been underway which will identify a list of cleanup actions in the Upper Basin and Box that will be completed as funds become available. The priority setting process will be documented in an Implementation Plan that compliments the ROD Amendment. This process will help ensure that the most effective actions are taken first. The goals of the ROD Amendment include:

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

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

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

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

Given the schedule for completion of a ROD Amendment for the Upper Basin in late 2011 or early 2012, this BEIPC 2012 work plan focuses only on those cleanup actions that are in an existing decision document (either for OU-2 or OU-3). The following is expected to be the focus of the work in 2012.

1. In 2011 collection of pre-design data at the Interstate Callahan mine site, waste rock area, Tamarack and Success sites in the East Fork of Ninemile Creek was completed. These sites have all been identified as a high priority in the Draft Implementation Plan that has been shared with the TLG and Upper Basin PFT and the CCC. They are also sites that have been included in the OU-3 2002 Interim Remedy. In 2012 additional pre-design data characterization may be required as one or more designs are moved forward for this area. The goal would be to have construction begin at one or more of these sites in 2013.
2. In 2011 collection of data within the East Fork of Ninemile Creek in the vicinity of the Success site for the purpose of designing a stream crossing structure in this area was completed. During 2012 the design for this crossing will be completed as will construction of a temporary crossing at this location.
3. Update of the Central Treatment Plant (CTP) master plan in order to plan for phased expansion of the plant to accommodate additional water for treatment from OU-2 and OU-3. Depending on the outcome and recommendation of the master plan update some pre-design data collection and/or design work for the CTP upgrades could begin in 2012.
4. Additional site characterization work of mine and mill sites within Canyon Creek including waste quantity evaluation for either repository or waste consolidation areas with particular emphasis on the Upper portion of Canyon Creek and the Hecla Star Complex in Burke.
5. In 2012 additional characterization of mine and mill sites for potential removal from the cleanup list will be conducted pursuant to the pilot study conducted in 2011. Any additional sites removed will be done after completion of the ROD Amendment.

1.3.2 Lower Basin Remedies

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

There continues to be significant data gaps pertaining to the relationship between Basin ecology and ongoing effects and movement of mining related contamination.

EPA continues implementation of the multi-year effort described in the Enhanced Conceptual Site Model (EPA released the ECSM document in 2010). The effort remains

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focused on filling critical data gaps and computational model development to better understand and predict contaminated sediment transport in the Lower Basin. Such modeling and data collection will further enhance the working hypothesis for contaminated sediment transport and will serve the future cleanup decision making and prioritization.

In 2012, the Lower Basin PFT will continue to assist the TLG and provide updates on new technologies and project ideas in order to implement the ROD for OU-3 where remedial actions are identified and where the potential for recontamination is low; the Lower Basin PFT will continue to identify recreational areas in the Lower Basin that could benefit from remedial action and restoration work and are of low risk of recontamination; the BEIPC will support EPA in an effort to secure funding from EPA Headquarters; and will task the Funding PFT with developing outside sources of funding for Lower Basin remedies as appropriate. While recent settlement agreements will provide additional funds for cleanups in the Basin, cleanup priorities will focus on addressing source stabilization and decreasing recontamination potential in the near term. Cleanup action identification in the Lower Basin will continue to be sought as described above.

Documents that will be generated as a result of the Lower Basin work include modeling work plans, data reports and other technical memorandums that are generated as more is learned about contaminated sediment transport and source areas in the Lower Basin. These documents will be shared with the subgroups of the BEIPC (e.g. Lower Basin PFT, TLG and CCC), interested stakeholder and citizen groups.

1.4 BASIN ENVIRONMENTAL MONITORING

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

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

- Assess long-term status and trends of surface water, sediment, groundwater and biological resource conditions in the Basin.
- Evaluate progress toward meeting remedial action objectives (RAOs), applicable or relevant and appropriate requirements (ARARs), and preliminary remediation goals (PRGs).
- Improve the understanding of Basin environmental processes and variability to improve the effectiveness and efficiency of remedial actions.
- Provide data for CERCLA required Five-Year Reviews of remedy performance.

During 2011 efforts were underway to revise the BEMP into a Comprehensive monitoring document. During this period of time the long-term status and trends were conducted under the existing OU-3 BEMP. In addition sampling under the existing OU-2 EMP and OU-3 RA effectiveness monitoring continued under the existing plans. During late 2011 EPA took steps to finalize the Comprehensive BEMP through the TLG for implementation in 2012. While this will become a final document the overall goal of the BEMP will be continued revision of QAPPs/FSPs that reflect the focus for the ongoing and upcoming cleanup work. This basically means focusing OU-2 and RA effectiveness monitoring on key areas where work is either planned and/or conducted.

EPA will continue to make analytical results from site surface water, sediment, and groundwater sampling available on a web-accessible data management system; human health-related data will not be included in this database. For the last several years, EPA has made site environmental monitoring data available through a web page. Nationally the STORET system has transitioned to the new WQX data management system and the site environmental monitoring data will be accessible at a new website: www.bunkerhilldata.org. The biological monitoring data and annual monitoring reports are also accessible at EPA's web page under Technical Documents at <http://yosemite.epa.gov/R10/CLEANUP.NSF/sites/cda>. If needed, EPA will assist interested stake holders in accessing the information.

PART 2 – OTHER BEIPC ACTIVITIES AND RESPONSIBILITIES

For Part 2, the 2011 work plan includes a number of work items that the BEIPC has elected to become involved in and items of work needed to accommodate some of the recommendations of the NAS study. The plan includes the following work:

- Lake Management Activities
- Funding for the Environmental Cleanup, Flood Control, and Infrastructure Revitalization
- Communications and Public Involvement

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- Natural Resource Damage Restoration
- Additional work assigned to the Executive Director to assist EPA, State of Idaho and local governments on project and program development.

2.1 LAKE MANAGEMENT ACTIVITIES

The OU-3 Interim ROD did not include CDA Lake in the Selected Remedy nor is there a remedy identified in the proposed Upper Basin ROD Amendment that is scheduled to be finalized in late 2011 or early 2012. The OU-3 Interim ROD anticipated that the State, Tribe, federal agencies, and local governments would implement a Lake Management Plan (LMP) outside the CERCLA (Superfund) process using separate regulatory authorities. The updated LMP was approved in 2009 and implementation has been underway. Implementation of the LMP is an adaptive management process and adjustments may be necessary as monitoring and other data are obtained and analyzed.

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

Examples of activities envisioned for implementation of the LMP in 2012 include, but are not limited to the following:

1. In 2010, the Tribe and IDEQ initiated the 3 Year Nutrient Source Inventory (as identified in Section 3.3, Objective 3 of the LMP) in the St. Maries/ St. Joe watersheds. The Tribe and IDEQ selected 7 sites where water quality monitoring will continue to be collected throughout 2012.
2. Continue joint water quality monitoring throughout Coeur d'Alene Lake for metals, nutrients, physical parameters, and biological communities. Throughout 2012, the Tribe and IDEQ will continue utilizing the ELCOM-CAEDYM and LOADEST models. These models are utilizing real-time data that is collected from Coeur d'Alene Lake including the establishment of five meteorological stations. In the summer of 2011, the Tribe installed a data logger buoy on the lake at station 5 (collecting parameters such as water temperature and dissolved oxygen at multiple depths), and IDEQ installed a new 10 meter weather station at Loff's Bay point adjacent to Camp Cross. In exchange for the weather station location, IDEQ and the Tribe introduced water quality curriculum to the camp counselors which the governments are hopeful will continue in 2012.
3. Present the draft annual monitoring reports for TLG review and comment when they are available.
4. Participate in Coeur d'Alene Basin Watershed Advisory Groups in order to re-assess Total Maximum Daily Loads (TMDLs) and develop Implementation Plans.

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5. Participate in joint educational outreach events such as the North Idaho Fair and Leadership Coeur d'Alene
6. Continue to develop an LMP Education/Outreach Program which will include the Lake*A*Syst (LAS) Program. In 2011, IDEQ and the Tribe contracted with the Pend Oreille LAS coordinator to revise existing LAS materials to make them Coeur d'Alene Lake specific. It is hopeful that the materials will be ready to initiate the implementation of the Program in 2012.
7. The Tribe will continue to implement the invasive Aquatic Plant Survey and Treatment Program within their current jurisdiction and IDEQ will continue implementing their aquatic plant surveys within northern pool bays.
8. Prioritize and initiate riverbank stabilization projects along eroding riverbanks in the St. Joe and lower St. Maries Rivers. IDEQ and Tribal staff will collaborate with Avista, the Natural Resource Conservation Service (NRCS), the Soil & Water Conservation Districts, the Counties, and local landowners.
9. The LMP Coordinators will continue to be involved in the Lower Basin PFT and support implementing projects identified in the 2002 OU-3 Interim ROD.
10. Present LMP activity updates to various groups throughout the year such as the North Idaho/Washington Lakes Conference, Homeowners Associations, Environmental Organizations, and Chambers of Commerce.
11. Provide an annual overview of LMP implementation activities to the CCC and solicit their input.
12. Continue to participate on an Advisory Committee to support the University of Idaho Extension Master Water Steward Program (IDAH20).

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

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

Funding for the BPRP in 2012 will be provided by the EPA and the State of Idaho on private, state, county and local government lands. The Federal Land Management agencies will provide funding for human health and ecological system cleanup actions on federally managed lands. For the near future, funding for implementation of additional human health and ecological remedies will be provided through the Coeur d'Alene Work Trust and funding obtained from settlement agreements with Potentially Responsible Parties. Developing a Flood Control program including levee evaluation and required

upgrade plus seeking a funding source for the work is assigned to the BEIPC Executive Director. Funding for the infrastructure revitalization activities is currently being addressed in the Drainage Control Infrastructure Revitalization Plan (DCIRP) process.

The BEIPC through the office of the Executive Director continues to pursue funding for an analysis of flood control needs and the existing levee system in the South Fork CDA River and Pine Creek. Working with the U.S. Army Corps of Engineers and the office of Senator Crapo, a project authorization request under the Water Resources Development Act was submitted to the Senate Environment and Public Works Committee for consideration. In 2012, that effort will be continued. The Executive Director will continue to work with the Idaho Silver Jackets organization including the COE, FEMA, Idaho Bureau of Homeland Security, Idaho Department of Water Resources, and the National Weather Service to develop an approach to dealing with potential flooding problems and levee management in the Upper Basin. The BEIPC will continue to assist Upper Basin communities and utilities in pursuing funding to implement the DCIRP.

In 2011, EPA and IDEQ began development of a program to evaluate and fund a “Road Surface as Remedial Barriers” program. Many paved and unpaved road surfaces in the site from Harrison to Mullan serve as barriers to the release of storm water, sediment and dust containing heavy metal contamination. The unpaved roads are being dealt with under the BPRP and a separate program is being developed for consideration of paved roads. In 2012 the evaluation of roads for contamination and surface condition will be completed and a program will be developed to work with the local road jurisdictions to establish funding levels and project lists for surfacing repair work to ensure that the paved surfaces continue to perform as barriers to the release of contamination.

2.3 COMMUNICATIONS AND PUBLIC INVOLVEMENT

During 2012, the Communications PFT will continue to address issues concerning the strengthening of public involvement and education in BEIPC activities and communication between the Basin community and the BEIPC and CERCLA cleanup and natural resource restoration implementing agencies. The CCC will continue to be the focus organization to facilitate public involvement in the BEIPC process.

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

- Re-evaluate what public involvement means in this process, so that it is most meaningful to the community. Is the public being informed, getting engaged, taking action, or interested? This will guide the activities to increase public attendance.
- Identify new opportunities for increasing public attendance at meetings and encouraging public involvement.
- Participate in a joint fair booth for public outreach/education at the North Idaho Fair.
- Sponsor other activities related to the BEIPC process for public education/outreach such as open houses, workshops, training, or public meetings.

- Work with the Executive Director on requests for presentations to public groups.
- Offer a “courtesy review” opportunity (when requested) to provide input or different perspectives before communications are made public.
- Develop a “Speaker’s Bureau” to identify a list of speakers based on particular group or need related to the CDA Basin cleanup.
- Develop and produce new communication material for the BEIPC and CCC.
- Utilize local radio and public television for publicity of events.
- Generate new communication and dispersal techniques.
- Update avenues of outreach in the CDA Basin and establish guidelines for use.
- Provide assistance for a “Riley Raccoon” educational campaign on recreation safety (with IDEQ and PHD) that is focused on children ages six and under. The purpose is to educate children about the importance of washing their hands after being exposed to contaminants like lead, especially after recreating in areas with high lead concentrations.
 - Brainstorm and assist in creating a cast of characters to accompany Riley Raccoon in promoting the message.

2.4 NATURAL RESOURCE DAMAGE RESTORATION

CERCLA natural resource trustees in the Coeur d’Alene Basin are the United States, represented by the U.S. Forest Service, U.S. Fish & Wildlife Service and U.S. Bureau of Land Management, the Coeur d’Alene Tribe, and the State of Idaho. In 2007, the federal and tribal trustees selected the preferred alternative for the final interim restoration plan and environmental assessment. The State of Idaho adopted the Trustee’s preferred alternative. The projects under the selected alternative of the Trustees’ interim restoration plan are being implemented using funds that the Trustees have recovered through CERCLA natural resource damage settlements with potentially responsible parties, or other funding as available for the purpose of natural resource restoration.

In the summer of 2011, the Federal District court for the District of Idaho signed an order finalizing settlement between Hecla Mining Company and the United States, Coeur d’Alene Tribe, and the State of Idaho. The settlement resolves one of the largest cases ever filed under Superfund statute. Under the settlement agreement, funds were distributed to the United States, Coeur d’Alene Tribe, and State of Idaho to resolve human health and environmental claims stemming from releases of wastes from Hecla’s mining operations. The Natural Resource Trustees first step toward restoration will be to develop a comprehensive plan to guide restoration of injured natural resources in the Coeur d’Alene Basin. The planning process is underway and will include public scoping, production of a draft plan, a public comment period, followed by response to comments, and finalization of the plan. Throughout 2012, the Trustees will continue to coordinate with the BEIPC, particularly through Project Focus Teams and the Trustees will provide updates to the BEIPC on basin restoration planning and implementation of projects. Some specifics on work that is scheduled to be conducted in 2012 include but are not limited to:

11/16/11

- Pine Creek Restoration- floodplain restoration activities will continue as well as monitoring.
- Schlepp Easement Restoration- ongoing habitat management in the east and west fields will continue as well as success monitoring.
- Moon Creek- completion of restoration monitoring with final report.