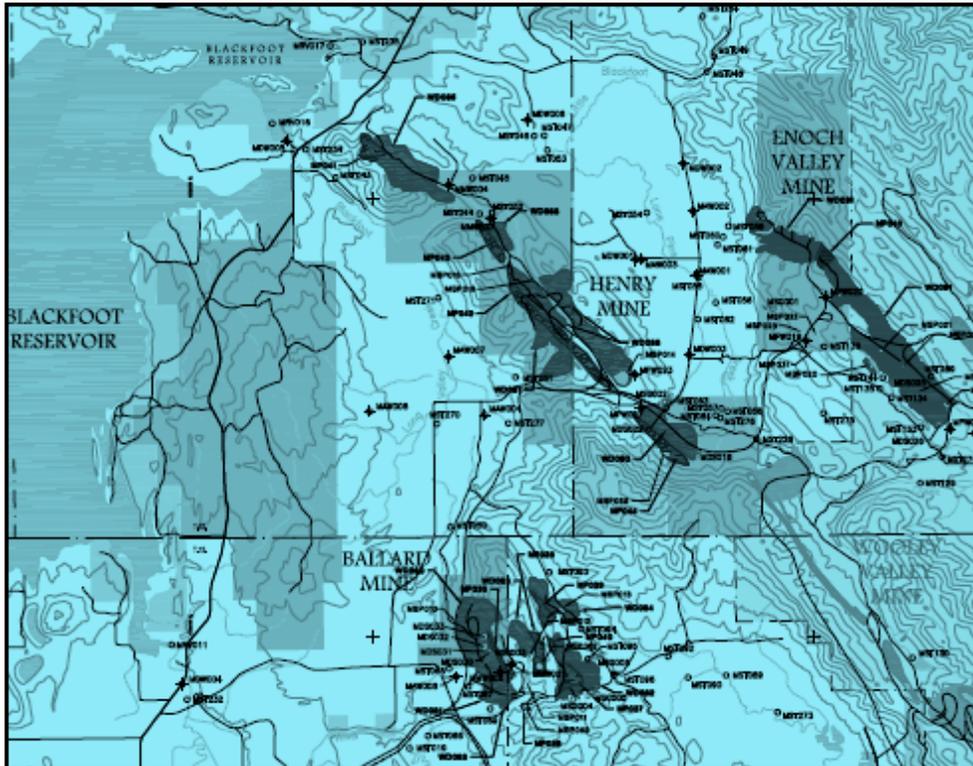


BALLARD, ENOCH VALLEY, AND HENRY (P4) MINES COMMUNITY INVOLVEMENT PLAN

2010



Prepared under Contract to Idaho Department of Environmental Quality,
Pocatello Regional Office Mining Program

In support of
Community Involvement for Selenium Issues in Southeast Idaho

For the U.S. Environmental Protection Agency and the Following Support Agencies:

Idaho Department of Environmental Quality

Shoshone Bannock Tribes

U.S. Department of the Interior, Bureau of Land Management

U.S. Department of Agriculture, Forest Service

U.S. Fish and Wildlife Service

Prepared by:
North Wind, Inc.



Community Involvement Plan
Ballard, Enoch Valley, and Henry (P4) Mines
Caribou County, Idaho

2010

This Community Involvement Plan summarizes stakeholder and interested parties' comments and concerns about the Ballard, Enoch Valley, and Henry Mines, owned by P4 Production L.L.C. (P4), a wholly owned subsidiary of Monsanto Company. The Plan describes how the U.S. Environmental Protection Agency (EPA), in cooperation with federal, state, and Tribal agencies, proposes to work with the community on a Remedial Investigation/ Feasibility Study (RI/FS) and subsequent cleanup (or Remedial Action) at the sites, which will be done under the federal Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). The EPA is the lead agency for this effort with the Idaho Department of Environmental Quality (DEQ), U.S. Department of Interior, Bureau of Land Management (BLM), U.S. Department of Agriculture, Forest Service (Forest Service), U.S. Fish and Wildlife Service (USFWS), and the Shoshone-Bannock Tribes participating as support agencies.

This Plan identifies outreach activities the agencies will use to address stakeholder concerns and inform the public about this work and opportunities they will have to provide input during the cleanup process. In some instances, opportunities for public participation will be informal, while other opportunities such as comment periods on plans developed at specific points during the process will be more structured.

The Plan will be sent to people who participated in community interviews relating to cleanup of the three P4 mines and the nearby Conda Mine, where a CERCLA RI/FS is also in progress on a similar schedule. Community involvement activities for these projects are being coordinated to accommodate stakeholders, who may have an interest in the cleanup of more than one site. The Plan will be reviewed and revised as project developments require and will be posted for review and comment at the following locations:

- EPA website (<http://www.epa.gov/region10/>)
- DEQ website (<http://www.deq.idaho.gov/Applications/NewsApp/comment.cfm>)
- Selenium Information System Project (SISP) website hosted by Idaho State University (ISU) (<http://giscenter.isu.edu/research/techpg/sisp/index.htm>)
- Information Repository locations (see Page 6 for locations).

GOALS OF THE COMMUNITY INVOLVEMENT PLAN

- Inform the public of current and planned site activities
- Maintain open, two-way communication with the public about site cleanup, ensuring questions are answered and concerns are addressed as they occur
- Provide interested parties with useful information

This plan contains, in the following order:

- Goals of the Community Involvement Plan
- Area Background
- About the Ballard, Enoch Valley, and Henry (P4) Mine Sites
- History of Community Involvement
- Current Community Concerns
- Planned Community Involvement Activities
- Attachment 1 (A and B): Results of Community Interviews
- Attachment 2: Community Involvement Requirements and Action Plan

For technical or public involvement related questions, or to request documents contact:

*Dave Tomten
EPA Idaho Operations Office
(208) 378-5763
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- Provide citizens with opportunities to comment on, and be involved in, technical decisions
- Encourage and assist local citizens in providing input to agency decisions that will have long-term effects on their community.

AREA BACKGROUND

Caribou County covers an area of approximately 1,766 square miles in Southeast Idaho. Wyoming borders the county on the east; Bear Lake and Franklin counties border it on the south; Bannock County forms its western border; and Bingham and Bonneville counties border it on the north. The estimated Caribou County population in 2008 was 6,826, and median household income in 2007 was \$48,066, higher than the median Idaho average of \$46,136.¹ The county seat is Soda Springs, which had an estimated population of 3,098 in 2007.²

Southeast Idaho is a major phosphate-producing region, and phosphate mining has been an important industry here since the mid-20th century. In Caribou and adjacent counties, phosphate mining has left behind waste rock dumps and open pits from which selenium and other contaminants may be released. Past studies – including mining company investigations, area-wide investigations, mine-specific studies and others – have identified these waste rock dumps as sources of contamination that may pose a risk to human health and/or the environment. These contaminants are known or suspected to be present in groundwater, surface water, sediment, soils, and plants and may be transported beyond the former mining areas.

About the Ballard, Enoch Valley, and Henry (P4) Mines

P4 is the potentially responsible party for cleanup of these three mine sites. The P4 mine sites are all located northeast of Soda Springs and east of State Highway 34 at varying distances (between one to four miles at their closest locations). The three mines are located on lands that are a mix of private and public ownership with much of the land privately owned.

The Ballard Mine is a historic phosphate mine that operated from 1951 to 1969. It is located on private and state lands in Caribou County, about 12 miles north of Soda Springs. The mine site is comprised of six distinct open mine pits (191 acres), six distinct waste rock dumps (317 acres), various sedimentation ponds, haul roads, shop building, and other facilities (96 acres). The footprint of the mining disturbance is about 1.7 miles long and 1.2 miles wide. Around 10.4 million tons of phosphate ore were mined, with all of the ore hauled to an elemental phosphorous plant near Soda Springs. Approximately 20 million cubic yards of waste rock were stripped, with about two million cubic yards used to backfill pits, and the remainder hauled to dumps. Following mining, some experimental plantings and reclamation research occurred dating back to 1958.

The Henry Mine is a historic phosphate mine that operated from 1969 to 1989. It is located about 15 miles north of Soda Springs and four miles southeast of Henry, Idaho. The mine is located mostly on state land, as well as some private and a small amount of public land administered by the BLM. The mine site is comprised of five mine pits or panels, waste rock dumps, haul roads, and sedimentation ponds. The footprint of the mining disturbance is about five miles long and one-half mile wide, with about 1,000 acres disturbed. About 18 million tons of ore and 99.6 million cubic yards of waste rock were produced. The site was reclaimed by backfilling most of the pits and grading, shaping, and vegetating disturbed areas.

¹ U.S. Census Bureau, <http://quickfacts.census.gov/qfd/index.html>

² Sub-county population estimates: Idaho 2000-2007, U.S. Census Bureau, Population Division. 2009-03-18.

The Enoch Valley Mine operated from 1989 to about 2004. Portions of the mine site remain active, including haul roads, ore storage, and administrative and maintenance facilities. It is located 2.5 miles east of the Henry Mine and about 19 miles northeast of Soda Springs. The mine site is located on state lands and public lands administered by the Forest Service as well as a small amount of private land. The mine site is comprised of two main waste rock dumps, and a large open pit most of which has been backfilled, along with ancillary facilities. Approximately 14.6 million tons of ore, and 51.5 million cubic yards of waste rock were produced. Much of the disturbed area of mine was reclaimed by shaping, spreading topsoil or growth media, and re-vegetating.

Waste rock piles comprised of shales high in selenium and other trace metals are present on the sites. Sampling results performed since 1996 show elevated levels of selenium and other hazardous substances in waste rock soils, vegetation, surface water, and other media, indicating that these constituents are leaching from waste rock into the environment. Livestock deaths associated with grazing have not been known to occur at the P4 mines, but are known to have occurred near other mines in the vicinity.

In accordance with a November 2009 Settlement Agreement and Agreement on Consent (AOC) and a July 2000 Memorandum of Understanding Concerning Contamination from the Phosphate Mining Operations in Southeastern Idaho, the EPA is the “lead agency” for these sites. The BLM, Forest Service, Idaho DEQ, USFWS, and the Shoshone-Bannock Tribes are participating as “support agencies.” As a former operator of the Ballard, Enoch Valley, and Henry Mines, P4 entered into the AOC and will investigate the sites with agency oversight.

The 2009 AOC for the RI/FS supersedes a 2003 AOC to complete a Site Investigation and Engineering Evaluation/Cost Analysis for these mines. Data from that effort that are of appropriate type and quality will be incorporated into the RI/FS as applicable.

The RI/FS will identify the types of contamination that exist at the site, how much exists, and how far it extends based on the results of sampling and testing of the following:

- Groundwater (occurrence, distribution, and effect)
- Surface water
- Sediment
- Soil
- Vegetation
- Aquatic species (fish, vegetation, and invertebrates)
- Terrestrial species (mammals, birds, and insects)
- Condition of reclaimed waste rock dumps

This information will be used to determine whether any contaminants pose unacceptable risk to human health or the environment, and, if so, to evaluate potential cleanup options and recommend a preferred alternative.

HISTORY OF COMMUNITY INVOLVEMENT

Previous community involvement activities included mailing out one fact sheet and holding one public information meeting in Soda Springs in 2008.

CURRENT COMMUNITY CONCERNS

Interviews with agency and mining company representatives took place in fall/winter 2008. Interviews with area stakeholders began in early May 2009, starting with elected officials: the Soda Springs mayor and City Council, regional staffers for the Idaho Congressional delegation, Caribou County commissioners, and local representatives to the Idaho Legislature. These were followed by interviews

with area residents; a list of potential interviewees developed during the course of the early interviews was supplemented with names of individuals who lived or worked near the P4 Mines, as well as other names recommended by stakeholders. Two interview availabilities at the Soda Springs Library, advertised in the *Caribou County Sun*, took place in September 2009.

Altogether, 63 individuals participated: 18 agency staff, seven mining company officials, 15 elected officials, 20 private individuals who live near the mine or have economic or other interests in it, and representatives of four environmental interest groups. Their comments and concerns fall into the following general categories:

Agency actions	Political factors
Blackfoot River impacts	Potential job/financial loss
CERCLA process	Public information
Contamination	Stakeholder relationships
Cost of cleanup	Surface water
Data/data quality	Technical approach
Ecology	Tribal issues
Groundwater	Vegetation/grazing impacts
Lack of progress	Visual and aesthetic impacts
Mining company actions	

Interview results, along with other information, are included as attachments 1A and 1B to this Plan. Attachment 1A summarizes specific comments in each of these categories, showing stakeholder groups who expressed each concern. Attachment 1B includes examples of text from interviews (respondents are not identified). Results of the interviews were also used to develop the Community Involvement Plan for cleanup of the Conda Mine, which is located near the P4 Mines but is being addressed in a separate RI/FS.

Interviewees also provided information about their preferences for receiving information about the RI/FS and participating in the process. These preferences, summarized below, helped shape the activities recommended in this Plan.

1. Interviewees in all groups (except Federal elected officials) cited inadequate public information as a concern.
2. Many interviewees said they wanted access to current information regarding contamination, area environmental investigations, and cleanup plans.
3. A number of interviewees said that they liked having the SISP website maintained by ISU, but that it is outdated. Several stakeholders recommended upgrading it with recent relevant documents and better functionality.
4. Some interviewees complained that the Administrative Record at the DEQ is unavailable for search, but requires a request for specific information. Many interviewees were not aware that some records were available at the Soda Springs Library.
5. Interviewees expressed little interest in public meetings or workshops. Many cited farming and ranching obligations, winter travel hazards, and church activities as reasons for preferring other forms of communication.

Some residents have Internet access, while others who live near the mine sites have no ISP service. The community involvement options discussed in the CIP are those most often suggested by interviewees; they include communication methods to meet these varying needs.

PLANNED COMMUNITY INVOLVEMENT ACTIVITIES

The activities proposed in this Community Involvement Plan address public involvement requirements established by law or regulation for all CERCLA sites. In addition, other activities may be conducted as requested by the public during the community interviews or throughout the remainder of the process. The required activities are included as a reference in Attachment 2: Community Involvement Requirements and Action Plan. Schedule estimates are approximate and will vary depending on project developments. This schedule includes estimates only for activities in 2010 at this point; it will be updated once a schedule is developed as part of the Ballard, Enoch Valley, and Henry Mines RI/FS Work Plan.

Public Information Updates – Updates on P4 project developments will continue to be prepared and distributed to stakeholders. Possible information products will include the following:

- Fact sheets – The fact sheet format will be similar to that of the “backgrounder” document provided to stakeholders who participated in interviews (*Spring 2009 Update: Phosphate Mine Site Investigation in Southeast Idaho*). They will focus on the status of the RI/FS process at the Ballard, Enoch Valley, and Henry Mine sites (and the Conda Mine, if appropriate); describe opportunities for stakeholder involvement; and generally try to address areas of interest. Fact sheets will be developed and mailed to the distribution list at key project milestones, or at least annually. This effort will be coordinated with distribution of district-wide annual status reports (described below).
- Postcards/e-mails – Postcards and e-mails could be used to direct stakeholders to review and comment opportunities, availability of the Administrative Record, and other key project developments. Fact sheets may substitute for postcards to provide information as appropriate.
- Press releases or briefings to announce important developments.
- Public notice – Some key project milestones will be communicated by publication of a public notice in local newspapers as required by CERCLA implementing regulations.
- Community display – A display explaining the RI/FS process (at the P4 Mines and Conda) will be developed for display at the Soda Springs Library.
- As the need arises, EPA will contribute information on RI/FS activities and environmental data for the P4 mines to other agencies for a planned annual status/data report that will summarize the cleanup status and sampling results for all mines in the project area for which data are available.

Key Contacts and Mailing Lists – Lists of key contacts (media representatives and elected officials) as well as a larger mailing list that includes all project stakeholders will be maintained to support distribution of information products.

Access to Documents – Some information about the P4 mines and other mines in the region is already available to the public via the DEQ website (http://www.deq.state.id.us/waste/prog_issues.cfm#mine), the ISU SISP website (<http://giscenter.isu.edu/research/techpg/sisp/index.htm>), and the Soda Springs Library. However, many stakeholders requested improved access to technical and decision documents. A number of stakeholders recommended updating the existing ISU website to provide better access to current sampling, analysis, quality assurance, and data validation plans. Annual data summaries, decision documents, and other documents will be posted to the ISU website. In addition, a page is being developed to provide information about the project on the EPA website, which will contain the contents of the Administrative Record (i.e., key documents), as well as a link to the ISU website. Information about public comment opportunities will be posted to the DEQ website at (<http://www.deq.idaho.gov/Applications/NewsApp/comment.cfm?CFID=150064&CFTOKEN=28798353>).

Notification of availability of key documents will take place via postcards or e-mails for those stakeholders who lack Internet access (as identified during community interviews), and will include

instructions about requesting hard copies of documents. Stakeholders may request other plans and reports by calling or e-mailing the project team member identified on p. 1 of this Plan.

The public will also have an opportunity to review and comment on this Community Involvement Plan in 2010 (see Attachment 2: Community Involvement Requirements and Action Plan for approximate schedule) and on the Proposed Plan when it is available (not yet scheduled).

Information Repository – CERCLA requires that an Administrative Record file for remedial actions be established at or near the site. In accordance with that requirement, an Administrative Record for the P4 Mines will be available for public review at the locations listed below. The public will be notified of the availability of the Administrative Record via the EPA, ISU, and DEQ websites and a newspaper notification. CERCLA also requires that information developed, received, published, or made available to the public be available for public inspection and copying and/or printing at an Information Repository.

EPA Region 10 Office in Boise (hard copy)
1435 N Orchard Street
Boise, ID 83706
(208) 378-5763

DEQ Pocatello Regional Office (hard copy)
444 Hospital Way, #300
Pocatello, ID 83201
(208) 236-6160

Soda Springs Public Library (electronic)
149 S Main St
Soda Springs, ID 83276-1496
(208) 547-2606

Shoshone-Bannock Tribes Library (electronic)
P.O. Box 306
Fort Hall, ID 83203
(208) 478-3882

Because of space limitations at the Soda Springs Library, information will be provided in electronic format. The library has a printer onsite for use by the public. Stakeholders may also make electronic copies of files. The public will be notified of the availability of the Information Repository via the EPA, DEQ, and ISU websites and a newspaper notification.

Public Meeting/Workshop on Proposed Plan – Informational meetings/workshops will take place at major project milestones (i.e., availability of the draft Proposed Plan) as required, and will be announced and advertised at least two weeks in advance in the *Caribou County Sun* and other regional papers of record. The community involvement team will develop a public meeting plan in advance, detailing plans for print and/or broadcast advertising, identifying media outlets, and ensuring the accuracy of mailing lists for key contacts and general distribution. Notification to stakeholders on the project contact list will take place via mail or e-mail (depending on any preferences identified during previous contacts). EPA will announce dates for community involvement activities associated with public review and comment on the Proposed Plan when the project technical schedule is complete.



Attachment 1A: Results of Community Interviews (Issues/Audiences Matrix)

Issue Category	Issue ID	Issue/Concern Summary	Agency	Tribes	Mining Industry	Elected Officials - state/local	Private	Elected Officials -federal	Interest Groups
Agency actions									
	10	Continuing mine operations or opening new mines during cleanup (agencies should not allow mines to expand until previous areas have been cleaned up.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	15	Confusion over area-wide vs. site-specific approach	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	29	Misplaced priorities: failure of some agencies to put the public or natural resources ahead of the mining companies; need trustees to advocate on the behalf of natural resources and interpret data in an impartial manner	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	32	Lack of overall leadership among the agencies (conflicting jurisdictions have resulted in a lack of direction). Lead agencies should be allowed to lead, and the support agencies should support, not try to lead.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	38	Past conflict among agencies (especially between DEQ and EPA) about who was in charge, which has slowed progress and left stakeholders reluctant to contact them.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	45	Lack of CERCLA experience of some Forest Service personnel; FS staff turnover. (Bringing new or inexperienced staff up to speed slows progress.)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	46	Perceived agency indecision and inaction (mining companies need a clear path forward, which the agencies need to provide). Agencies have not done their job.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	49	Failure of Tribes to fulfill their responsibilities promptly, which has resulted in delays (need for time limits on review)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	67	Agency responsiveness to public concerns (generally cooperative, positive, open)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	69	Distrust of various agencies for various reasons: they have politicized cleanup, acted in an adversarial manner, dismissed locals' opinions, given incompetent direction, and/or not cooperated with each other	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Issue Category	Issue ID	Issue/Concern Summary	Agency	Tribes	Mining Industry	Elected Officials - state/local	Private	Elected Officials -federal	Interest Groups
	71	Confusing messages from the agencies: Slow pace of project gives the perception that selenium is not a serious concern. If it were, the pace would be quicker.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	75	Failure of agencies to conduct required public involvement and communication (and/or provide feedback about past public involvement and communications activities)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	83	Perceived lack of respect for landowners' property rights, work schedules, and feelings (on the part of the agencies).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	96	Retribution against agency employees who try to speak honestly about mining contamination issues (transfers, threats)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	99	Agencies may be afraid to endorse new mining BMPs; if new practices do not work, the agencies will be blamed for the failure.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Blackfoot River impacts									
	4	Water quality and fish habitat in the Blackfoot River and tributaries; cumulative impacts on the Blackfoot River; mining may not be feasible if action not taken	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	28	Need for prompt, significant cleanup action in the Blackfoot watershed so mines can continue to operate in the future	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
CERCLA process									
	3	Possibility of listing by EPA	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	18	Stigma associated with CERCLA/Superfund actions in the community	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Contamination									
	14	Impacts from contaminated vegetation and/or waste to livestock health, especially sheep and horses, who are more susceptible to negative effects from too much selenium; livestock deaths	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Issue Category	Issue ID	Issue/Concern Summary	Agency	Tribes	Mining Industry	Elected Officials - state/local	Private	Elected Officials -federal	Interest Groups
	25	High concentrations of releases at/near the Conda site	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	41	Potential impacts, including contaminants other than selenium such as cadmium	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>				
	81	Ponds located at mine sites: what is their function, what happens to the waste water and contamination?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	87	Human health impacts among mine employees, those who work farms and ranches, hunt and fish near the mine sites and then eat wildlife and fish.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	92	Purchase of more and more land by mining companies to hide contamination (restricting grazing and access prevents public from seeing widespread contamination that is visible from the air)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Cost of cleanup									
	7	Cost vs benefit: high cost of cleanup given low level of contamination	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	26	Costs associated with cleanup of huge waste piles	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Data/data quality									
	1	Substantial data gaps, or conflicting data and conclusions, as to what the real risk is -- especially the ecological risk and impacts on fish populations	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	21	Inadequate/incomplete analysis of water impacts (fails to consider role of organics and colocated metals, which can affect selenium readings)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	27	Need for more/better data about the connection between groundwater and surface water in the area, as well as the dynamics of water and soil and selenium concentrations.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	50	Data gaps, but retain usable data; do not start over	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Issue Category	Issue ID	Issue/Concern Summary	Agency	Tribes	Mining Industry	Elected Officials - state/local	Private	Elected Officials -federal	Interest Groups
	60	Need for access to clear and accurate environmental data to support educated decisions.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ecology									
	13	Potential for the area to become single use (mining only) over time if pre-mining uses suffer; potential negative impacts on recreation and tourism if fish and game habitats are affected	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Groundwater									
	12	Groundwater contamination: lack of data, concern about its contamination because it is much harder to treat, concerns about well safety.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Lack of progress									
	2	Perceived lack of progress and slow pace of cleanup, which give the impression that agencies are not doing their jobs and/or caused environmental interest groups to get involved	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	17	Lack of progress in cleanup, which has allowed contamination to continue	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Mining company actions									
	16	Lack of success with voluntary cleanup proposals made by mining companies so far (not substantive and have resulted in delays)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	24	Disconnect between words and actions on the part of the mining companies	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	37	Past history of ineffective working relationship between mining company and regulators (some due to contractor issues, which have been addressed)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	64	Positive perception of mining companies' cleanup efforts among local communities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	68	Mining company responsiveness to public concerns (generally positive)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Issue Category	Issue ID	Issue/Concern Summary	Agency	Tribes	Mining Industry	Elected Officials - state/local	Private	Elected Officials -federal	Interest Groups
	80	Failure on part of mining companies to provide any feedback to residents who have allowed them to collect data on their property.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	84	Perceived lack of respect for landowners' property rights, work schedules, concerns and feelings (on the part of the mining companies).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	93	Efforts by mining company management to conceal the scope of the selenium problem in the region	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	98	Mining companies have acknowledged past practices and mistakes and have an interest in moving on.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Political factors									
	91	Perception that pro-mining bias and/or conflicts of interest in Idaho state government have prevented DEQ from doing its job.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	94	Failure of the federal government over the last eight years to enforce compliance with CERCLA and other environmental regulations.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	95	Retribution against agency employees who try to speak honestly about mining contamination issues (transfers, threats)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Potential job/financial loss									
	6	Potential loss of mining jobs if contamination is not addressed promptly	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	39	Land values: sale of ranches and subsequent subdivision is bad for the land, but large acreages are hard to sell to wealthy purchasers if near a CERCLA site	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	47	Importance of continuing operations to clean up (if companies cannot make money, they cannot support cleanup)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	79	Company town syndrome -- employees and vendors are careful about what they say publicly.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	85	Area-wide financial losses from land and grazing restrictions, livestock deaths, and reduced recreation, winter sports, hunting/fishing, and multi-use.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Issue Category	Issue ID	Issue/Concern Summary	Agency	Tribes	Mining Industry	Elected Officials - state/local	Private	Elected Officials -federal	Interest Groups
Public information									
	20	Inconsistent public information (confusion about conflicting information being put out by the agencies and the mining companies)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	33	Lack of public understanding: of longer term impacts on ecology (low risk of health impacts reduces perception of urgency); of positive vs. negative impacts of selenium	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	40	Media sensationalism vs. balance (Idaho State Journal vs Caribou County Sun)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	42	Lack of a clear understanding of risks associated with selenium contamination on the part of the public	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	48	Inadequate public information -- especially in affected communities: lack of facts, contact information, transparency, easily accessible information repository (AR/IR should be electronic)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>				
	52	Lack of public understanding of the CERCLA process, associated time frames and industry work to remedy past problems/prevent future ones.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	57	Best tools for reaching stakeholders: regular monitoring reports, internet site with project documents, listservs, videos, interviews/briefings, kiosk/open house at library, regular factsheets and other concise written information on key developments	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
	58	National Mining Association studies (do not get public attention)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	59	Separate information repository for Shoshone Bannock Tribes	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	63	Good mining company public communications (Monsanto has an effective public relations/communication campaign; Agrium is improving)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	65	Media outlet credibility: Caribou County Sun has the most credibility of media serving the community.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Issue Category	Issue ID	Issue/Concern Summary	Agency	Tribes	Mining Industry	Elected Officials - state/local	Private	Elected Officials -federal	Interest Groups
	66	Mining employees' expertise (they understand risks and share information with community)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	72	Public does not understand why the EE/CA process was not adequate to address the problem. Perception is that the change from EE/CA to RI/FS is to cover agencies' liability or involvement in a mismanaged project.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	73	Information bias: media representatives "spin" the news to attract customers.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	74	Loss of mining company transparency (used to be more open with public; now will not say anything unless it has been cleared in advance by management)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	76	Fear on the part of industry and agencies that information they make public will be used against them	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	77	Lack of accountability to the public on the part of agencies and industry (The best thing they could do would be to get negative news out to the public faster.)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	78	Need for regular status reports in laymans' terms identifying the PRP, lead agency, latest selenium readings, planned actions, and cleanup timetable	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	89	Positive effect resulting from environmental interest group involvement in mine cleanup: both mining companies and agencies are providing more and better information to local stakeholders, who previously had few facts.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Stakeholder relationships									
	5	Lack of communication/cooperation among groups with conflicting interests (mining, tribes, ranchers, etc.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	8	Value conflicts: local stakeholders vs. new landowners from other parts of the country who may have environmentalist values or are concerned about property investments	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	9	Church relationships - mine managers often have positions of leadership in the church; regular employees may feel uncomfortable expressing opposing views in public settings	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Issue Category	Issue ID	Issue/Concern Summary	Agency	Tribes	Mining Industry	Elected Officials - state/local	Private	Elected Officials -federal	Interest Groups
	22	Lack of public participation/outreach, which has: caused groups to become polarized; left stakeholders in the dark; ignored the rights and interests of potentially affected stakeholders.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	34	Danger of litigation, with courts making the decision. Parties (mines, agencies, and other stakeholders) need to work together to resolve these issues in a reasonable way for the good of everyone.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	35	Uncoordinated start to cleanup in the 90s with little progress, which led to polarization	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	62	Good community relations on the part of the mining companies (they work with the communities and keep elected officials and residents informed)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	70	Lack of effort on the part of the agencies to involve local residents in outreach, planning (i.e., sampling/work plans, document reviews) and/or decision making.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	86	Perceived unfair behavior on the part of mining company employees, who create bad community relationships by hunting and fishing on mine site property where other residents do not have access.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	88	Community concerns over increasingly limited sportsmans' access due to mining and mine contamination/cleanup	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	97	Need to balance environmental protection with the need for jobs in the region.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Surface water									
	11	Concerns about safety of surface water downstream from mines for irrigation and livestock watering.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	19	Contamination of water systems and soils in the Smoky Canyon area, especially in western Wyoming	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Technical approach									
	30	Inconsistent technical approach (technical teams need guidance and area-wide direction)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Issue Category	Issue ID	Issue/Concern Summary	Agency	Tribes	Mining Industry	Elected Officials - state/local	Private	Elected Officials -federal	Interest Groups
	31	Best available technologies (employ BAT for cleanup and treatment; consider treatability studies and passive treatments)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Tribal issues									
	36	Tribal concerns about use of trust lands (ensure decisions are protective and mindful of Tribal interests)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Vegetation/grazing impacts									
	23	Impacts on ability of ranchers to graze livestock; grazing restrictions	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	82	Impacts on vegetation in areas where livestock graze.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Visual/aesthetic impacts									
	90	Negative impacts of strip mining on environmental aesthetics in the Caribou Highlands (Mining has ruined the scenery, which should be restored.)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



Attachment 1B: Results of Community Interviews (Interview Text Examples)

Issue Category

Example Text

Agency actions

There was a public working group that . . . held public meetings and ignored you if you weren't praising the mining companies. These were meetings for the public, but weren't conducive to the public.

It also appears that the DEQ and the Environmental Protection Agency (EPA), and other agencies halted any potential clean-up and rehabilitation activities and have impeded progress substantially.

Even when faced with clear evidence, they (the agencies) still don't get it. Instead of coming clean and saying it was the selenium contamination that killed the cows, they cover it up. The agencies aren't to be trusted.

All agencies could have done better. The presentations made to the public in the past were well attended, but left citizens frustrated with the pace at which things take place. The agencies continue to investigate and analyze, rather than proceeding with the clean up. Also, over the past 11 years, there have only been 3-4 meetings specifically held to inform members of the community.

One of the biggest problems is that the agencies try to manage this project through consensus. Consensus is great, but not for this project. Each project has a lead agency identified. Other agencies are supposed to lend their support. No one will support - they will only lead. No one will trust another agency to move forward.

It's important that agencies, industry and individuals be fair and honest.

(Forest Service staff) did the permitting on the mine expansion and also led the CERCLA cleanup. There is a real conflict there ... an entire career spent facilitating phosphate mining permitting – then having the lead for cleaning it up.

There is a lot the industries would like to do, but the agencies say we do not have enough information yet.

Industry people want to proceed, but cannot get agency approval and the agencies are not moving.

Blackfoot River impacts

A lot of people fish the Blackfoot River. This is not a huge human threat, but there is still the potential. The agencies shouldn't wait until it becomes a huge human issue.

CERCLA process

Some community leaders are concerned about the stigma of having CERCLA sites in the community because it can affect tourism, real estate, new business locations, etc.

Action Plan for Community Involvement for the P4 Mines in 2010

Activity	Date *	How
Update Distribution List	Apr-2010	<ul style="list-style-type: none"> • Ongoing activity
Post Community Involvement Plan for public review and comment (includes information about the results of the community interviews)	Jul-2010	<ul style="list-style-type: none"> • Post on EPA, DEQ and ISU websites • Copies distributed to Information Repositories and individuals who participated in community interviews
Complete updates to the ISU website (http://giscenter.isu.edu/research/techpg/sisp/Reports.htm)	Aug-2010 (update content at least every 6 months)	<ul style="list-style-type: none"> • Install Administrative Record and other project-relevant documents
Announce availability of the Information Repositories and Internet resources	Aug-2010 (update content at least every 6 months)	<ul style="list-style-type: none"> • Post on EPA, DEQ and ISU websites • Newspaper announcement (Caribou County Sun and other newspapers of record); include information about options for obtaining documents for stakeholders without Internet access
Notify stakeholders who participated in community interviews of options for obtaining project documents if they do not have Internet access	Aug-2010	<ul style="list-style-type: none"> • Notify via postcard or email
Produce and distribute factsheet	Sep-10, then annually	<ul style="list-style-type: none"> • Post on EPA, DEQ and ISU websites, mail or email to community interview participants
Produce and install a community display at the Soda Springs Library	Oct-2010	<ul style="list-style-type: none"> • Provide information about the CERCLA and the RI/FS process

* Additional activities beyond 2010 will be added to this list when the P4 technical schedule is available.

Issue Category	Example Text
<u>CERCLA process</u>	It's the process that makes progress slow.
<u>Contamination</u>	<p>I worry about the human health impacts. I see cases of leukemia in the community and wonder about it. The mines should stay, but should be cleaned up and operated responsibly in the future.</p> <p>It has not only been a financial hardship, but it has been emotional as well. I . . . have serious concerns about the environmental and/or health impacts from the contamination present in the site.</p> <p>I have concerns about health impacts. There are ongoing concerns with selenium contamination. My concerns are about the fish, wildlife, air, water, etc. And – human health.</p> <p>The risks associated with selenium have been blown out of proportion.</p>
<u>Cost of cleanup</u>	The waste piles are huge and the cost can limit you to some extent to what can be done.
<u>Data/data quality</u>	<p>Data has not been sufficiently analyzed nor distributed to the affected parties including the . . . general public.</p> <p>The agencies are positioning themselves to disallow the data – more rigorous standards to do more studies – and this is not needed across the board . . . There are data gaps, but they should not ignore it all.</p> <p>The agencies and mining companies should work together on fact sheets before they are ever released to the public.</p> <p>Would like to see a regular report of the sampling data. They don't receive monitoring information – would be interested in getting it.</p> <p>Data should be at the layman's level so ranchers would know how to interpret it (not just the raw data). Simple, factual information would help.</p> <p>Easy access to sampling and monitoring data would help. They should publish a current status report in the newspaper so everyone can see it.</p>
<u>Ecology/multiple use</u>	<p>My biggest concern is for the ecological effects from the selenium contamination. What is the selenium doing to our aquatic resources and terrestrial wildlife?.</p> <p>People realize they need to protect the environment in balance with the need for jobs.</p>

Issue Category

Example Text

Ecology/multiple use

Land must be managed for multiple use, and cleanup should be done right to support multiple use.

Companies need to (do the) clean up themselves so the lands can be turned back over for multiple-use.

Groundwater

The groundwater hasn't been characterized, and there are a lot of data gaps and uncertainties.

The public does not want the groundwater (contamination) to go beyond the mine site footprint.

Lack of progress

Very little has changed in the last 10 years. The problem is no closer to being resolved.

They have to establish a goal and know how to measure it.

Repeat sampling with similar results have been conducted for over 20 years are a large and valid concern, particularly since absolutely no efforts have been made to clean-up and rehabilitate affected areas.

As soon as you get someone in who doesn't understand the process up to speed, you have to start over.

I know there isn't any cleanup taking place and I wonder why we're still hammering out the AOCs.

There are a lot of agencies and stakeholders involved, which further complicates an already daunting task.

To hell with the process – just fix it!

The (mining) company has set aside money for the work, but part of the problem is that they need well-considered interim projects to start working toward a goal in the short term.

Mining company actions

Mining company representatives came and sampled their wells and irrigation water a couple of years ago, but they never received any feedback on the results. They would like to receive information whenever sampling takes place on their property.

I don't think the mining companies are trying to do anything wrong. When they started mining, there was a set of rules they followed. As technology and testing has evolved, situations change and new rules have to be set. It doesn't mean they have to shut down.

The mines do a good job of public relations and communication. They are honest, forthright and proactive.

Issue Category

Example Text

Mining company actions

The mining companies acknowledged past practices and past mistakes and have an interest in moving on. The mining companies expressed that they have learned and they have responded accordingly. They did what the agencies told them to do in the past. Now they have new BMPs but can't get agencies to buy off on them. Companies expressed to him that they can't get agency approval because they don't want to get in trouble if it doesn't work.

Agrium has not been as open in the past as Monsanto, but they are getting better.

The mining companies have been very responsive. They have spent millions to address the problem - and maybe the agencies don't care about that, but the public does. There has to be some balance developed and solutions implemented.

A number of years ago the mining companies established a selenium subcommittee. They fund a variety of the cleanup activities. DEQ bills them for cleanup activities, and they in turn bill the responsible company.

As a whole, for locals and non-locals, the greatest concern is the environment and that the mining companies are doing their job to meet environmental requirements.

Political factors

The agencies are trying to do the right thing, but politics get in the way.

The DEQ employees are frustrated, but aren't able to affect change – which gets to politics.

Any agency person who speaks up and says there is a problem is transferred or fired.

The fact that Bob Geddes, a Monsanto employee and long-time manager of the P4 mines, is President Pro-tem of the Idaho Senate does not seem fair. It gives the impression of a conflict of interest when the Senate is dealing with phosphate mining matters. I fault industry for not keeping the community aware of what's going on through either the newspaper or other sources.

Our state is a pro-mining state. Governor Otter used to be an executive for Simplot. Kempthorne was the PA officer for FMC. Geddes works for Monsanto. With these strong political ties, the State DEQ is incapable of doing the right thing because of the fear their budgets will be cut – and the State doesn't want to cause any harm to the mining companies.

Potential job/financial loss

Many people have health concerns. This is a company town here, though. The employees and vendors are careful what they say.

If the mining companies cannot make money, they cannot generate the funds to support the cleanup.

There have been meetings with strong feelings expressed about not shutting down mining operations.

Public information

The best thing the agencies and industry can do is to get the negative issues out faster to the public. Do the agencies usually issue a press release when something is wrong? If you don't, how do the people know?

I propose that two times a year the agencies publish a list of all the mine sites, which companies are responsible, which agency has the lead, the latest selenium reading, action being taken, current action, and timetable for the future. Make everyone accountable to the public.

We need regular, factual outreach. Industry and the agencies need to provide a quarterly or annual report. As it stands, the public is getting information from the noisiest source, and it is not balanced.

A website that is maintained would be of use. Also, a repository that is open to the public would be good too. DEQ charges for documents.

More communication is needed from the agencies. I personally need a number I can call at each of the agencies when I have questions.

The Greater Yellowstone Coalition has raised issues that the agencies and industry have let slide.

There has not been enough communication or public involvement so far. This needs to change.

The Administrative Record and Information Repository should be electronic. What they have is way outdated and not organized.

In the past, the agencies and mining companies have done a horrible job of communicating with the public. It's almost like they're covering up the issues. The DEQ and mines are at fault for not communicating to the public on their own instead of being mandated by law to do it.

Meetings aren't announced in enough time to get the word out ahead of time so the public knows what to ask.

Agencies can lose credit with public and tribes if they can't answer questions at public meetings. They should utilize company representatives to assist in the public involvement process when necessary and proper.

Everyone in the community knows more now that the Greater Yellowstone Coalition has gotten involved and has kept these issues in the media.

None of the players – mining companies, agencies, and interested groups – has explained things well to the public.

Public information

With very little communication over the past few years, the public needs to know what is going on – especially the employees and the public in Soda Springs, Montpelier, and Bear Lake and Caribou Counties. It would be helpful to start providing regular communication through local papers such as the Caribou County Sun and the Montpelier News Examiner.

The (communications) process should be based on science and risk, not emotion.

When an interview or survey is done, there is no feedback about the results.

I want to know what's going on. The average citizen can't wade through 1,000 page documents and expect to learn very much. Maybe they don't want us to know if they're making it so hard. I would like to know the plan and intentions for clean up. What is the goal? And I would like to have some input into that process.

One idea would be doing an insert a couple of times a year in the local paper. Explain what the investigation shows, what the problems are, and how to fix them. Be sure to talk in layman's terms.

A two-times a year update would be great. Then to have a contact list of names I can call, too.

The community needs newsletter and/or something in the paper because they don't understand the real issues. Blogs or emails. Making sampling results available would be good. There are studies going on all year, and people would be interested in the results.

The library website has community links that information could be posted on. An open house could be hosted at the library.

As press releases came out, they could be e-mailed to the library for posting.

Whatever information is put out there needs to be in terms the average citizen can understand.

DEQ used to have a list of people – they need to combine that with the EPA's list and develop an area-wide mailing list.

The public wants to hear all sides of the issues relating to the mines.

Advertising, billboards, etc. have stirred things up.

Citizens in the community are frustrated and want to know why the switch from the EE/CA to a RI/FS and why everything has to start over.

Issue Category

Example Text

Public information

Information should be sent out in power bills or via the school kids.

Conversations are the best way to get information.

They would like additional briefings, and face-to-face meetings.

Short, bulleted information is better.

River Fest and Environmental Fair in Pocatello are good places to give information.

Public is not satisfied with information they get. Don't have clear understanding of what it (selenium) is doing and can it be fixed. What's being done about it? They need to address getting information to public about what can be done. Need clear causes, effects and solutions.

On-the-ground tours work best – taking them to the mines and showing them where selenium would be coming from. Show them open, reclaimed, etc. so they see different stages.

Talking to people in person is best to communicate information. No mailing list.

Small intimate meetings, not hearings. Meetings at people's homes – at the coffee shops.

They would like little updates – maybe every three months. Just the basics. They are not sure how many people would use websites. Most people do read the Sun and watch network news on TV.

Public meetings are waste of time unless they are absolutely required for regulatory compliance.

Stakeholder relationships/involvement

It's good that they're doing the interviews, and the public involvement component of the cleanup is good. In the past the agencies and mining companies have done a horrible job of communicating with the public.

We have had no input on anything. We feel like as landowners we should have been kept in the loop more. We deserve to know everything that is going on with regard to our land.

Local folks have more positive perceptions than people who live outside the area . . . Overall, there is a varied perception that depends on geography. If they have a "tie" to mining they are more informed and more well-rounded in the information they are receiving than is the general public.

Issue Category

Example Text

Stakeholder relationships/involvement

Most local stakeholders want to know if daddy or mommy will have a job in a few years – are the companies taking care of the problem and can they continue to work? They are not concerned about potential health impacts – just that the mines can stay open. Beyond that, for outsiders who do not have a vested interest, it is easy to point fingers.

The biggest thing missing has been public involvement. They have had scientists etc. saying what should they study next but they need to ask the public what they are concerned about.

Would be interested in reviewing the final reports on the investigations and feasibility studies as well as the proposed plan.

I would like to see sampling plans in advance.

We would like to review and provide comments (on reports and planning documents).

We would also like to be on the list to have the opportunity to review documents.

Surface water

They are worried about taking their horses and letting them drink the water . . . I am very concerned about certain areas and wouldn't take my own horse to those areas.

Technical approach

I don't think the mining companies are trying to do anything wrong. When they started mining, there was a set of rules they followed. As technology and testing has evolved, situations change and new rules have to be set. It doesn't mean they have to shut down.

Tribal issues

Ensure decisions being made throughout the process are protective and mindful of the Shoshone-Bannock Tribes interests.

Vegetation/grazing impacts

We now have concerns about impacts (from vegetation). If the government hadn't stepped in and changed grazing practices everything would have been fine.

Visual and aesthetic impacts

I'm not worried about human health impacts, but about the environment. Having grown up in the area, I don't like what it's done to the landscape. Mining has ruined the beauty of the area.



Attachment 2: Community Involvement Requirements and Action Plan

The activities proposed in this Community Involvement Plan address public involvement requirements established by law or regulation for all Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) sites. The information in this attachment is included as a helpful reference. The schedule at the end of this attachment is for community involvement activities planned to take place in 2010.

The citations at the end of each paragraph use the following abbreviations (in addition to CERCLA):

- NCP: National Contingency Plan
- CFR: Code of Federal Regulations

The numbers and letters in parentheses indicate the chapter, section, and paragraph where this information originates. Copies of these laws and regulations can be requested from any Environmental Protection Agency (EPA) office.

Requirement	Status for This Project
When a Site Is Added to the National Priorities List:	
<p>When the Proposed Rule is released, EPA must publish the proposed rule in the Federal Register and seek public comments through a formal public comment period. NCP 40 CFR 300.425(d)(5)(i) When the Final Rule is released, EPA must publish the final rule in the Federal Register and respond to significant comments and significant new data submitted during the comment period in a Responsiveness Summary. NCP 40 CFR 300.425(d)(5)(i)</p>	<ul style="list-style-type: none"> • These sites have not been listed on the National Priorities List, so this requirement is not applicable.
Prior to Remedial Investigation (RI):	
<p>Prior to the start of the remedial investigation, the lead agency must conduct community interviews with local officials, public interest groups, and community members to solicit their concerns and information needs and to learn how and when people would like to be involved in the Superfund process. (NCP 40 CFR 300.430(c)(2)(i).</p> <p>Before commencing field work for the remedial investigation, the lead agency must develop and approve a complete Community Involvement Plan based on community interviews and other relevant information, specifying the community involvement activities that the lead agency expects to undertake during the remedial response. (NCP 40 CFR 300.430(c)(2)(ii)</p>	<ul style="list-style-type: none"> • Community interviews took place in 2009. • The Community Involvement Plan is to be posted for public review in July 2010.
<p>Before the start of the remedial investigation, the lead agency must establish at least one information repository at or near the location of the response action. Each information repository should contain a copy of items developed, received, published, or made available to the public including information that describes the Technical Assistance Grant application process. The lead agency must make these items available for public inspection and copying and must inform interested citizens of the establishment of the information repository. CERCLA 117(d); NCP 40 CFR 300.430(c)(2)(iii)</p>	<ul style="list-style-type: none"> • Notice of availability of the information repository to be published in the Caribou County Sun and other newspapers of record in August 2010.

Requirement	Status for This Project
As the Remedial Investigation Begins:	
<p>As the RI begins, the lead agency must establish an administrative record, make it available for public inspection, and publish a notice of its availability. The lead agency must comply with the public participation procedures required in 300.430(f)(3) and shall document such compliance in the administrative record. CERCLA 113(k); NCP 40 CFR 300.815(a-c)</p> <p>When the Administrative Record is established, the lead agency must publish a notice of availability of the administrative record in a major local newspaper of general circulation. NCP 40 CFR 300.815(a)</p>	<ul style="list-style-type: none"> • Notice of availability of the Administrative Record to be published in the Caribou County Sun and other newspapers of record in August 2010.
When the Feasibility Study (FS) and Proposed Plan Are Completed:	
<p>When the RI/FS and Proposed Plan are done, the lead agency must publish a notice of the availability of the RI/FS and Proposed Plan, including a brief analysis of the Proposed Plan, in a major local newspaper of general circulation. The notice also must announce a comment period. CERCLA 117(a) and (d); NCP 40 CFR 300.430(f)(3)(i)(a)</p> <p>After the RI/FS and Proposed Plan are released, the lead agency must provide at least 30 days for the submission of written and oral comments on the Proposed Plan and supporting information located in the information repository, including the RI/FS. This comment period will be extended by a minimum of 30 additional days upon timely request. CERCLA 113(k); NCP 40 CFR 300.430(f)(3)(c)</p> <p>During the public comment period following the release of the proposed plan, the lead agency must provide an opportunity for a public meeting regarding the Proposed Plan and supporting information to be held at or near the site during the comment period. CERCLA 113 and 117(b); NCP 40 CFR 300.430(f)(3)(i)(D)</p> <p>Following the public meeting to solicit public comments, the lead agency must have a court reporter prepare a meeting transcript that is made available to the public. CERCLA 117(a)(2); NCP 40 CFR 300.430(f)(3)(i)(E) Before settlement for remedial action, such as enforcement agreements and consent decrees, become final, a notice of the proposed settlement must be published in the Federal Register for at least 30 days. This notice must state the name of the facility and the parties to the proposed agreement. Those persons who are not parties to the agreement must be provided an opportunity to file written comments for a period of 30 days. CERCLA 122; NCP 40 CFR 300.430(c)(5)(i) and (ii)</p>	<ul style="list-style-type: none"> • The Feasibility Study and Proposed Plan will not be completed until after 2010.
Pre-Record of Decision Significant Changes:	
<p>If there are significant changes to the proposed plan, the lead agency must prepare a response to significant comments, criticisms, and new data submitted on the Proposed Plan and RI/FS, and ensure that this response document accompanies the Record of Decision (ROD). CERCLA 113 and 117(b); NCP 40 CFR 300.430(f)(3)(i)(F)</p> <p>If there are significant changes to the proposed plan, the lead agency must include in the ROD a discussion of significant changes and the reasons for such changes, if new information is made available that significantly changes the basic features of the remedy and the lead agency determines that the changes could be reasonably anticipated by the public. NCP 40 CFR 300.430(f)(3)(ii)(A)</p> <p>Upon the lead agencies' determination that significant changes to the proposed plan could not have been reasonably anticipated by the public, the Agency must issue a revised Proposed Plan that includes a discussion of the significant changes and the reasons for such changes. The Agency must seek additional public comment on the revised Proposed Plan. NCP 40 CFR 300.430(f)(3)(ii)(B)</p>	<p>Activities associated with these requirements will take place after 2010.</p>

Requirement	Status for This Project
After the Record of Decision Is Signed:	
<p>After the Record of Decision is finished, the lead agency must make the ROD available for public inspection and copying at or near the site prior to the commencement of any remedial action. Also, the lead agency must publish a notice of the ROD's availability in a major local newspaper of general circulation. The notice must state the basis and purpose of the selected action. NCP 40 CFR 300.430(f)(6)</p> <p>Prior to the remedial design, the lead agency should revise the Community Involvement Plan, if needed, to reflect community concerns discovered during interviews and other activities, that pertain to the remedial design and construction phase. NCP 40 CFR 300.435(c)(1)</p>	Activities associated with these requirements will take place after 2010.
Post-Record of Decision Significant Changes:	
<p>If an Explanation of Significant Differences is needed following the Record of Decision, the lead agency must publish a notice that briefly summarizes the explanation of significant differences (ESD) and the reasons for such differences in a major local newspaper, and make the explanation of significant differences and supporting information available to the public in the administrative record and information repository. NCP 40 CFR 300.435(c)(2)(i) (A) and (B).</p> <p>If an Amendment to the Record of Decision is needed, the lead agency must propose an amendment to the ROD and issue a notice of the proposed amendment in a major local newspaper of general circulation. NCP 40 CFR 300.435(c)(2)(ii)(A).</p> <p>For a Record of Decision Amendment, the lead agency must follow the same procedures for notice and comment as those required for completion of the feasibility study (FS) and the Proposed Plan, including Public Comment Period, Public Meeting, Meeting Transcript, and Responsiveness Summary. NCP 40 CFR 300.435(c)(2)(ii) (B)-(F)</p> <p>When the Amended Record of Decision is available, the lead agency must publish a notice of availability of the amended ROD in a major local newspaper and make the amended ROD and supporting information available for public inspection and copying in the administrative record and information repository prior to commencement of the remedial action affected by the amendment. NCP 40 CFR 300.435(c)(2)(ii) (G) and (H)</p>	Activities associated with these requirements will take place after 2010.
Remedial Design:	
Upon completion of the final engineering design, the lead agency must issue a fact sheet and provide a public briefing, as appropriate, prior to beginning remedial action. NCP 40 CFR 300.435(c)(3)	Activities associated with these requirements will take place after 2010.