



# **Community Involvement Plan Ross-Adams Mine Site**

**March 2025**



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## Overview

This Community Involvement Plan has been developed to guide public participation and communications about site activities at the Ross-Adams Site, a former uranium mine located in the Tongass National Forest. Active community and partner engagement, as well as tribal consultation, is critical to the success of the project.

The community involvement activities for the Ross-Adams Site (Site) are designed to inform the public of the environmental conditions at the Site, involve the public in the Engineering Evaluation/Cost Analysis decision-making process, and inform the public of the progress being made toward final cleanup and closure of the Site.

The Engineering Evaluation/Cost Analysis dated April 2015 was accepted as final after the May 2015 public comment process was completed. On April 3, 2018, a Non-Time Critical Removal Action Memorandum was approved, selecting the removal action alternative to be implemented at the Site.

On March 9, 2020, Newmont USA Limited (Newmont) and Dawn Mining Company LLC (Dawn) voluntarily entered into an Administrative Settlement Agreement and Order on Consent with the USDA Forest Service to perform the selected removal action for the Site in accordance with the Final Engineering Evaluation/Cost Analysis, the Removal Action Memorandum, the Administrative Settlement Agreement and Order on Consent, and the Statement of Work.

This Community Involvement Plan is designed to facilitate communication between the communities near the Ross-Adams Site, other interested parties, the government agencies involved, and the mining companies.

## Site Specific Information

### 2.1. BACKGROUND

The Ross-Adams Site is a former uranium mine located in the Tongass National Forest near the southern end of Prince of Wales Island, Alaska. The Ross-Adams ore was mined by open pit and then later by underground operations intermittently between 1957 and 1971 by several different mining companies.

### 2.2. SITE LOCATION

The Ross-Adams Site is located about 38 air miles southwest of Ketchikan and 33 air miles southeast of Hydaburg, Alaska. It is on the southeastern slopes of Bokan Mountain within the Kendrick Creek Watershed, which drains to the West Arm of Kendrick Bay.

Kendrick Bay is a five-mile long fiord that opens to Clarence Strait on the east side of Prince of Wales Island. Typical of fiords in southeast Alaska, Kendrick Bay is characterized by a steep, narrow intertidal zone between low- and high-water lines, and a subtidal zone below the low-water line.

### **2.3. SITE HISTORY AND DESCRIPTION**

The Ross-Adams ore deposit was discovered in 1955. The mine was initially developed by open-pit mining and later by underground operations from three portals at different elevations: 900-foot level, 700-foot level, and 300-foot level. Mine rock was placed near the open pit and the portals at the three levels. A mine road was constructed between the 700-foot and 900-foot levels and haul roads were constructed from the 900-foot and 300-foot levels to the ore staging area, which is located on the coast. The ore produced from all of the levels was hauled by truck to the ore staging area and barge loading docks on the north shore of the West Arm of Kendrick Bay. All of the ore was shipped offsite for processing. No milling operations were conducted at the Site that would have generated tailings or other processed materials. The remaining Site features associated with the former mine operations include:

- 900-foot level - open pit, mine portal and air vent shaft, north and south mine rock piles and mine rock embankments along the access road to the 700-foot level;
- 700-foot level - mine portal and mine rock pile;
- 300-foot level - mine portal with mine water drainage and mine rock pile;
- Former Ore Staging Area (OSA) – at northern shore of the West Arm of Kendrick Bay, with residual ore materials;
- Former Ore Loading Docks – Two remnant rock ramps extend from the Ore Staging Area into the West Arm of Kendrick Bay and the remnants of a third and older ramp are located west of the existing floating dock; and
- Mine and Haul Roads - primary roads constructed for exploration and mine access which served as haul roads connecting the 700-foot, 900-foot and 300-foot levels to the former Ore Staging Area and loading docks/ramps.

The mine affected area is 17.2 acres the 1,400-acre Kendrick Creek watershed and approximately 65,788 cubic yards of mine rock are located onsite.

Mineral exploration focused on rare earth ore deposits is ongoing in the Bokan Mountain area, including the Ross-Adams Site and Kendrick Creek watershed, by UCore Rare Metals, Inc. (UCore).

### **2.4. ACCESSIBILITY AND USE**

The Ross-Adams Site is remote and is accessible only by float plane or boat, or over land by hiking through many miles of trailless rugged terrain. Uses of the Site include Forest Service workers, and mineral and recreational users.

The Tongass National Forest Land and Resource Management Plan designates the Site for mineral exploration and timber production. Mineral exploration is currently focused in areas adjacent to the Site. No developed recreation facilities or sites exist in Kendrick Bay. Kendrick Bay is used for commercial and recreational fishing and recreational boating.

Executive Order 12580 delegates lead agency authority under the Comprehensive Environmental Response, Compensation, and Liability Act to federal agencies. The Forest Service-led removal action effort is being managed under the Act's process called a Non-Time Critical Removal Action. The following sections describe the various steps in the removal action process.

## Cleanup Process

### 3.1 EXPANDED SITE INVESTIGATION

An Expanded Site Investigation was conducted in 2009 to address data gaps identified by previous investigations by collecting additional data and information to characterize physical, chemical and radiological conditions of the Site. Data was collected to further characterize the mine features and environmental media consisting of soil, surface water, stream sediment, marine sediment, and air (radon). Comprehensive gamma surveys, which measure gamma-emitting exposure rates of surface materials, were conducted to define the spatial extent of the mine features and naturally mineralized background areas.

### 3.2 SITE CHARACTERIZATION REPORT

The Site Characterization Report was finalized in November 2010 to present the results and conclusions of the Expanded Site Investigation and previous investigations. The Site Characterization Report defines the chemical and radiological characteristics of the mine features and media, establishes the nature and extent of impacts from historic mining operations, and defines the physical limits and engineering aspects of the mine features and Site. The results presented in the Site Characterization Report are used to support preparation of the human health and ecological risk assessments and the Engineering Evaluation/Cost Analysis.

### 3.3 RISK ASSESSMENT

Risk assessments evaluate potential risks to human and ecological receptors associated with existing Site conditions considering site-specific current and future land uses, exposure units, exposure pathways and receptors. The Engineering Evaluation/Cost Analysis includes the human health and ecological risk assessments for the Site. The human health risk assessment evaluates potential exposures to a possible site visitor, occupational site worker for mineral exploration and forestry, and for traditional food gathering. The ecological risk assessment evaluates potential risks to terrestrial and aquatic environments, including freshwater and marine plants, invertebrates, and wildlife.

### 3.4 ENGINEERING EVALUATION/COST ANALYSIS

The Engineering Evaluation/Cost Analysis identifies and evaluates removal action alternatives that address potential human health and ecological risks resulting from historic mining activities at the Ross-Adams Site. The Engineering Evaluation/Cost Analysis includes:

- Removal action objectives pertinent to site-specific conditions that address the identified exposure pathways and risks for existing conditions defined by the human and ecological risk assessments.
- Applicable or relevant and appropriate requirements for the removal action alternatives.
- Site-specific removal action alternatives from evaluation and screening of potentially applicable technologies.
- Detailed analysis of the site-specific removal action alternatives based on three primary criteria: effectiveness, ability to implement, and cost according to Engineering Evaluation/Cost Analysis guidance.
- A comparative analysis to evaluate the relative advantages and disadvantages of the removal action alternatives.

- Recommends a preferred removal action for the Site removal action alternatives applicable to the Ross-Adams Site include:
  - No Action
  - In-place Stabilization of Mine Rock
  - In-place Containment of Mine Rock with Earthen Covers
  - On-site Consolidation of Mine Rock with Earthen and/or Synthetic Covers
  - Mine Portal Access Restrictions
  - Mine Portal Hydraulic Controls
  - Portal Closure
  - Institutional/Engineering Controls

Newmont and Dawn submitted the Draft Engineering Evaluation/Cost Analysis including the draft risk assessments, to the Forest Service for agency and partner review in March 2011. The public review process was completed, and a Final Engineering Evaluation/Cost Analysis dated April 2015 was accepted.

### **3.5 NON-TIME-CRITICAL REMOVAL ACTION MEMORANDUM**

The Non-Time-Critical Removal Action Memorandum dated April 3, 2018, authorizes the removal action. The Action Memo selected the recommended removal action alternatives from the Final Engineering Evaluation/Cost Analysis. Based on the detailed and comparative analysis of the removal action alternatives, the combination of Mine Rock Alternative M-5 and Portal Alternative P-4 best satisfies the evaluation criteria.

Both the mine rock and the mine portal alternatives are protective of human health and the environment in reducing or eliminating the exposure pathways and risks. Both alternatives are effective in reducing incremental radiation risks due to external gamma radiation and inhalation of radon decay products associated with mine rock and the inhalation of radon decay products associated with the mine openings.

*Mine Rock Alternative M-5 includes of the following components:*

- Removal of ore rock within the intertidal zone associated with former loading ramps and ore loading operations and consolidation at the Open Pit Repository.
- Removal of the miscellaneous solid waste and debris and transport for off-site recycling and disposal, except for drill core that would be consolidated at the Open Pit Repository.
- Excavating, transporting, and consolidating the mine-affected material from the Ore Staging Area and the mine rock piles from the 300-foot level; 700-foot level, and 900-foot level (North and South) at the Open Pit Repository.
- Excavating and consolidating the Spur Road materials in the Open Pit and closing the road.
- Removing and consolidating the identified mine road (between the 700-foot and 900-foot levels) surface and embankment material in the Open Pit and closing the mine road.
- Excavating the mine rock from the identified segments of the haul road and consolidating the material in the Open Pit.

- Placing a synthetic geomembrane barrier and 2-foot-thick earthen cover on the mine rock materials consolidated at the Open Pit Repository from the on-site borrow source and constructing stormwater controls to protect the covered areas.
- Implementing institutional controls, access controls, and/or land use restrictions to protect the integrity of the removal action.

*Portal Alternative P-4 consists of the following components:*

- Closure of the upper mine openings consisting of the 900-foot level portal, air vent shaft and 700-foot level portal.
- Constructing a concrete bulkhead at the 300-foot level portal, with a water collection and piping system to convey the drainage from the portal directly to Kendrick Creek.
- Implementing institutional controls, access controls, and/or land use restrictions to protect the integrity of the portal closures.

### **3.6 ADMINISTRATIVE SETTLEMENT AGREEMENT AND ORDER ON CONSENT FOR REMOVAL ACTION**

The Administrative Settlement Agreement and Order on Consent for Removal Action between the Forest Service and Newmont USA and Dawn was approved on March 9, 2020. It details the specifics for the non-time critical removal action pursuant to the the Comprehensive Environmental Response, Compensation, and Liability Act at the Ross-Adams Mine Site.

The Administrative Settlement Agreement and Order on Consent describes the work to be performed in accordance with the Non-Time-Critical Removal Action Memorandum and the Statement of Work which is included as Exhibit C. The Administrative Settlement Agreement and Order on Consent also provides direction on other aspects of the project such as additional investigation and analysis, approval of plans and other submittals, other applicable laws and dispute resolution.

### **3.7 PRE-DESIGN INVESTIGATIONS**

Pre-design investigation work plans were submitted and approved in accordance with the Statement of Work. These work plans included provisions for the haul road stability, mine rock, borrow source, surface hydrology mine portal and miscellaneous waste investigations. The purpose of this investigation work is to gather information identified in the data gaps evaluation for use in the construction design for the removal action. Additionally, a Quality Assurance Project Plan and Health and Safety Plan were developed for the site work.

### **3.8 REMOVAL ACTION IMPLEMENTATION**

Upon completion of the pre-design investigations, the removal action design will be completed. The design shall include the construction plans, specifications, drawings and supporting plans to implement the removal action at the site as defined in the action memo. Once the design is reviewed and approved, a removal action work plan will be submitted outlining the schedule for the removal action work.

The removal action construction work is estimated to take two years to complete. This is currently scheduled for 2025 and 2026 field seasons.

### **3.9 POST REMOVAL MONITORING, MAINTENANCE, AND INSPECTION**

A Post Removal Site Control Plan will be developed, reviewed, and approved. The Post Removal Site Control Plan will describe post-construction monitoring, maintenance, and inspection activities, including inspections of the constructed removal action and any necessary maintenance. Post-removal water quality monitoring in Kendrick Creek shall be conducted twice a year for the first three years following construction.

## **Community Involvement**

### **4.0 COMMUNITY INVOLVEMENT**

Various public meetings have been held updating the tribal community, partners, and other interested members of the public on the status of the project. Public meetings were held from 2009 through 2015. These meetings presented information about the Ross-Adams Mine project and the information in the Engineering Evaluation/Cost Analysis.

The public had the opportunity to ask questions and provide comment. In addition, the public was notified in 2020 of the public comment opportunity for the Administrative Settlement Agreement and Order on Consent. Comments were received and responded to prior to the Administrative Settlement Agreement and Order on Consent being finalized. Section 5.0 Community Involvement Plan outlines the activities that will be used to keep the community and interested parties informed of work at the site.

### **4.1 COMMUNITY PERCEPTIONS OF CLEANUP EFFORT**

Perceptions from the community toward studying and cleaning up the Site have been positive. It has been communicated with emphasis that the cleanup project at Bokan Mountain is a separate project from the recent ongoing rare earth metal mineral exploration efforts undertaken by UCore. Cleanup efforts at the Site are to address old mining impacts at the former uranium mine located at Bokan Mountain, which is in and around the area of interest for rare earth metals.

The Site is remote and not accessible by road, so many people have never been to Bokan Mountain. Unlike some other historic mine sites where old milling equipment of noted public interest remains, the Site does not contain historic cultural mining features of voiced public interest.

### **4.2 SPECIFIC COMMUNITY COMMENTS, QUESTIONS AND RESPONSES**

The following provides responses to specific comments and questions received to date from the community:

- What about radioactive tailings, mine dust, and radon blowing over Prince of Wales Island. What effect can it have on the community's health? *Milling did not occur on Site and therefore there are no tailings and fine-grained materials that would be subject to wind erosion. Levels of dust at the Site, even during dry periods, is insignificant due to the grain size and physically stable nature of the rock containing the radioactive elements of interest that were mined, such as uranium. While radon gas exists at relatively high levels near the existing former mine portals, levels reduce quickly toward natural background levels a short distance from the portals (within the Site itself).*

- What about the health of the people who worked at the former mine site in the 1950s-1970s? *The cleanup effort addresses current risk to human health, as well as ecological, with existing conditions at the Site from former mining practices. Safety and occupational exposure to radiation for former mine workers was to have been followed at the time of mining. Safety regulations practiced at the former uranium mine is outside of the scope of this environmental cleanup effort.*
- I wonder about the effects of the radiation on the salmon that go into Kendrick Creek. So, what about the salmon spawning in the creek and what if a bear eats the affected salmon? What effects are there to sea cucumbers and crab? Does the radon also affect the plants in the area that the bears and deer are eating? Our concern is more about humans, but what is the effect on a deer? How does it affect the wildlife or critters in the area? Can any radiation effects be transferred to humans who may eat a deer that has been affected? *Natural existing radiation exists within the Bokan Mountain area and that is why uranium mining was conducted. Human and ecological risk assessment studies indicate quite localized areas of radiation caused by former mining activities above natural background levels that pose risk to human and ecological receptors. These areas are targeted for cleanup.*
- Would the earthquake a few years back influence any of the radioactive material within the Site? *There are no known impacts to the Site from earthquakes that would particularly affect radioactive material as related to environmental risk or cleanup activities at the Site. Earthquake impacts to the physical structures of the Bokan Mountain area would affect mined rock areas as well as natural rock areas containing radioactive constituents.*
- Why spend all this money to study and clean this remote old mine where people (miners) use to work for day after day anyway? What is the point of cleaning up this old mine and then having some mining company from Vancouver come in and mine all over again? I understand that they have been looking into mining there again. *The Comprehensive Environmental Response, Compensation & Liability Act (CERCLA) establishes a process for investigating, characterizing, and cleaning up CERCLA hazardous substances released to the environment. Because of the former mining activities contributing to the definition of released hazardous substances found at the Site, CERCLA process(law) must be followed by the Forest Service. Site cleanup alternatives encompass mineral development interests in the area to the extent practical and within constraints of CERCLA.*
- Can you talk about worst case scenarios...if someone walked through the mine one day years ago, what would be the effect? *One day would have no effect on a person, but for example being on Site for many days each year for say 10-20 years could be dangerous to one's health. International health physics studies over decades have shown that people exposed to the same amount of radiation may be affected differently.*

# Community Involvement Plan

## **5.0 COMMUNITY INVOLVEMENT PLAN**

The overall goal of the Community Involvement Plan is to maintain and promote communication about the ongoing site work between citizens, tribes, and the agencies involved in the project.

### **5.1 DESIGNATED SPOKESPERSON**

Michele Parker, the On-Scene Coordinator, is designated as the Forest Service spokesperson for the Ross-Adams Site cleanup and other related issues and serves as the primary point of contact for community members, tribes, regulatory agencies, and all interested parties as it pertains to cleanup of the Site.

### **5.2 REGULATORY AGENCY, TRIBAL, AND STAKEHOLDER INTERACTION**

In addition to the Forest Service, other regulatory agencies involved in the Site cleanup process include the Alaska Department of Environmental Conservation and the U.S. Environmental Protection Agency. Meanwhile, community members, interest groups, the Hydaburg Cooperative Association, the Organized Village of Kasaan, and UCore have expressed interest in the cleanup process with several involved in the planning.

### **5.3 COMMUNITY INTERACTION**

The objective of community interaction is to obtain, synthesize, and apply the essential contact information required to keep stakeholders informed about the project. Personal community contacts will be maintained and expanded upon over the course of the project through interviews and public forums, as well as community advisory or special interest groups impacted or interested in the project.

### **5.4 KEEPING THE PUBLIC INFORMED**

Citizens, tribes, participating agency staff, decision makers and other interested parties will be provided with current, accurate, easy-to-read information throughout the project, with updates as appropriate, and distribution based upon the scope of the information. Information will be provided through email, the Tongass National Forest website, and applicable products and platforms.

### **5.5 ESTABLISH AND MAINTAIN AN ADMINISTRATIVE RECORD FOR THE SITE**

An Administrative Record is being maintained for the Site. This Record contains key information leading to the preferred cleanup alternative for the Site and is available to the public. It will be updated as necessary. Additionally, it is available on the Tongass National Forest website under the Managing the Land and Projects tabs. See Tongass National Forest - Projects ([usda.gov](http://usda.gov)). The website is also being used as a repository of information about progress towards the removal action at the site.

### **5.6 CONDUCT AND FACILITATE PUBLIC MEETINGS**

The Forest Service will coordinate and schedule, prepare for, and attend any meetings to update the community on Site developments and address community questions, concerns, ideas, and

comments. The agency will also provide notice of any scheduled meetings. Additionally, the District Ranger will include an update on the Ross-Adams cleanup project at various public meetings as needed.

## **5.7 KEY CONTACTS**

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