



COMMUNITY ENGAGEMENT PLAN  
ROSS-ADAMS SITE  
TONGASS NATIONAL FOREST, ALASKA

APRIL 22, 2015

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# 1.0 OVERVIEW

This Community Engagement Plan has been developed to guide public participation and communications regarding environmental activities at the Ross-Adams Site, a former uranium mine located in the Tongass National Forest. Active community, tribal consultation, and stakeholder engagement is critical to the success of the project. The community engagement 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 decision-making process that will affect them, involve the public in the remedies being considered for cleanup of the Site, and inform the public of the progress being made toward final cleanup and closure of the Site.

In April 2009, Newmont USA Limited (Newmont) and Dawn Mining Company LLC (Dawn) voluntarily entered into an Administrative Settlement

Agreement and Order on Consent (ASAOC) with the USDA Forest Service (USFS) to perform an Engineering Evaluation/Cost Analysis (EE/CA) for the Site. The ASAOC is a legally binding agreement that prescribes completion of the following major tasks and deliverables: Site Planning Documents – detailed sampling, quality assurance, and safety plans; Expanded Site Investigation (ESI); Site Characterization Report (SCR); and Engineering Evaluation/Cost Analysis (EE/CA). The



WEST ARM KENDRICK BAY AND BOKAN MOUNTAIN



OPEN PIT (LOWER RIGHT) ON BOKAN MOUNTAIN

EE/CA includes human health and ecological risk assessments for the Site. The activities completed to date include the Site Planning Documents, the ESI, the SCR, and the EE/CA. This Community Engagement 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, as well as to encourage community involvement in Site activities.

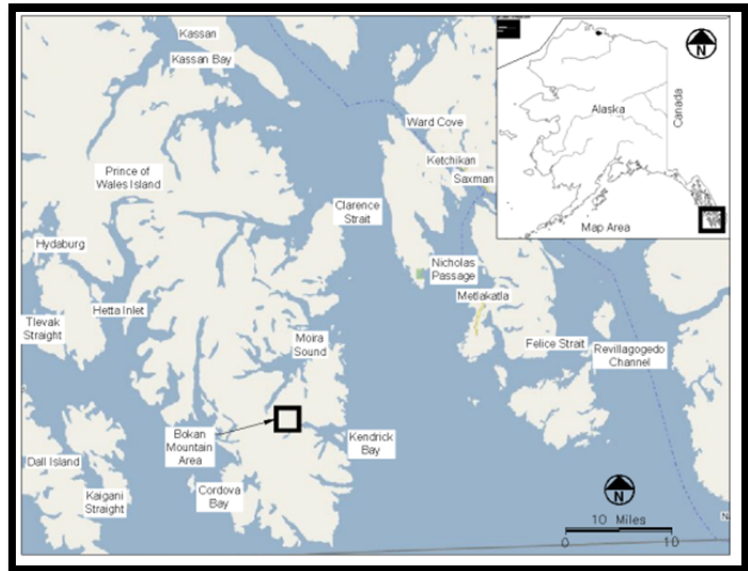
## 2.0 SITE SPECIFIC INFORMATION

### 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 in the Tongass National Forest, on the southern end of Prince of Wales Island approximately 38 air miles southwest of Ketchikan and 33 air miles southeast of Hydaburg, Alaska. It is located 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. Mining at the Site began in 1957 and was conducted intermittently through 1971 by various mining companies. 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



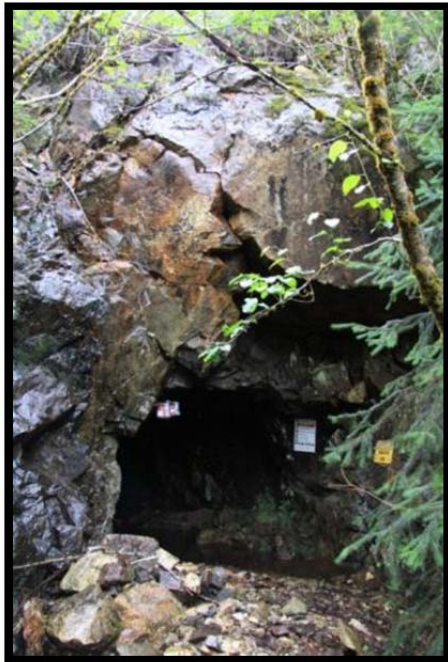
OPEN PIT ON BOKAN MOUNTAIN

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 tailing or other process 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 (MRP), and mine rock embankments along the access road to the 700-Foot Level



900-FOOT LEVEL PORTAL



700-FOOT LEVEL PORTAL

The mine affected area is 17.2 acres within 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 has recently occurred in the Bokan Mountain area, including the Ross-Adams Site and Kendrick Creek watershed, by UCore Rare Metals, Inc. (UCore).

- 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 OSA 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
- Mine and Haul Roads (including I&L spur road) - 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 OSA and loading docks/ramps



FORMER ORE LOADING DOCK

## 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 trail-less rugged terrain. Uses of the Site include USFS workers, mineral



FORMER ORE LOADING RAMP

exploration workers, occasional subsistence hunting-gathering users, and occasional recreational visitors. The Tongass National Forest Land and Resource Management Plan has designated 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.

## 3.0 CLEANUP PROCESS

### 3.1 USDA FOREST SERVICE – LEAD AGENCY

The Site and surrounding area are under the jurisdiction and custody of the USDA Forest Service, which is the lead agency for the cleanup process, working in conjunction with Newmont/Dawn, Alaska Department of Environmental Conservation (ADEC), Environmental Protection Agency (EPA), Organized Village of Kasaan (OVK), and other stakeholders. The hazardous substances identified at the site qualify the Site for removal action under the authorities of the Comprehensive Environmental Response, Compensation & Liability Act (CERCLA). Executive Order 12580 delegates lead agency authority under CERCLA to federal agencies.

The Forest Service led removal action effort is being managed under a CERCLA process called a Non-Time Critical Removal Action. The process requires review of the EE/CA within a 30 day public comment period. The EE/CA defines and evaluates the range of removal action (cleanup) alternatives to mitigate potential risk from historic mining activities by addressing the mine rock materials, adjacent mine-affected areas, and affected media defined by site characterization.

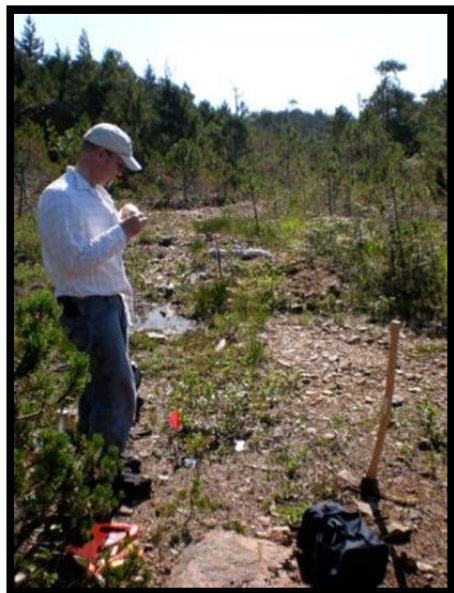


SITE DATA COLLECTION

Human health and ecological risk assessments have been conducted as part of the EE/CA to evaluate existing risks to human health and the environment associated with historic mining operations and to assess the effectiveness of cleanup alternatives.

### 3.2 EXPANDED SITE INVESTIGATION

An Expanded Site Investigation (ESI) 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 were 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.



SITE DATA COLLECTION

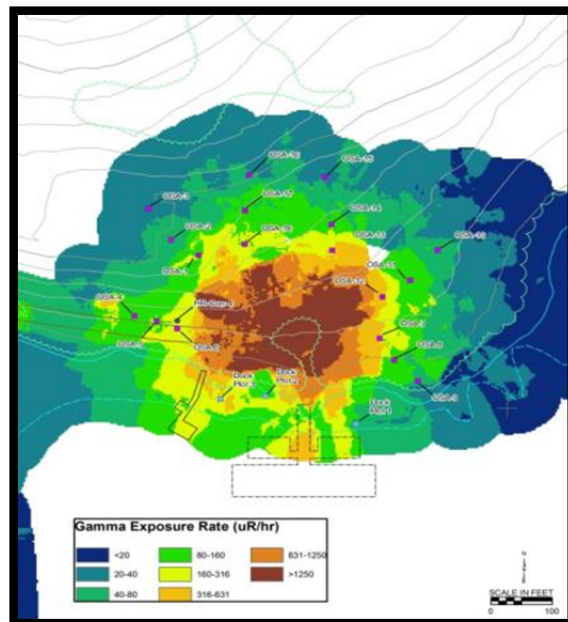
### 3.3 SITE CHARACTERIZATION REPORT

The Site Characterization Report (SCR) was finalized in November 2010 to present the results and conclusions of the ESI and previous investigations. The SCR 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 SCR are used to support preparation of the human health and ecological risk assessments and the EE/CA.

### 3.4 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 EE/CA 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.



OSA GAMMA SURVEY

### 3.5 ENGINEERING EVALUATION/COST ANALYSIS

The EE/CA 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 EE/CA includes:

- Removal action objectives (RAOs) 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 (ARARs) 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, implementability, and cost according to EE/CA guidance
- A comparative analysis to evaluate the relative advantages and disadvantages of the removal action alternatives
- Recommends a preferred removal action for the Site

The removal actions 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 EE/CA, including the draft risk assessments, to the USFS for agency and stakeholder review in March 2011. The USFS, ADEC, and EPA provided comments. Newmont and Dawn submitted responses to those comments in November 2011. In 2012 and 2013, discussions and meetings occurred between USFS, ADEC, Newmont, and Dawn to address further questions and comments. A Revised Draft EE/CA, addressing those comments, was submitted to the USFS in March 2014. Upon addressing agency follow-up comments, the EE/CA is issued for public review in May 2015.



OPEN PIT

CERCLA requires public notice for an EE/CA public review period of 30 days. The EE/CA is available for public review from May 1 through May 30, 2015. Upon timely receipt of a request, the

comment period will be extended for 15 calendar days. Following public review, the USFS will prepare a written response to significant comments. Once significant comments have been addressed, the EE/CA is acknowledged as Final and a CERCLA Non-Time-Critical Removal Action Approval Action Memorandum (decision document) is to be written and then signed by the USDA Forest Service Regional Forester (Alaska Region) authorizing the removal action per the selected cleanup alternative in the Final EE/CA.

## 4.0 COMMUNITY ENGAGEMENT

Various public meetings have been held updating the tribal community, stakeholders and other interested public on the status of the project. A public presentation was given at the Prince of Wales Island Mining Symposium in Craig, Alaska in May 2009, to provide information about the Site and ongoing data collection efforts for the ESI. A meeting to update the community was held in Hydaburg, Alaska in September 2009. A public open house event was held in Hydaburg in December 2010 to present the findings from the SCR and status of the project. The status of the Draft EE/CA was provided by the USFS on April 16, 2011 in two same-day public meetings in conjunction with the public informational meeting regarding rare earth metals exploration activities at Bokan Mountain. A presentation was included at the Prince of Wales Island-Wide Mining Symposium in Craig on May 8-10, 2012 and on April 24-25, 2014 to update stakeholders and other interested public on the status of the project. A community meeting will be held in Klawock on April 28, 2015 to present the EE/CA and the risk assessments for public review and comment, with a follow-up presentation at the Prince of Wales Island-Wide Mining Symposium in Klawock on April 29, 2015.

### 4.1 COMMUNITY PERCEPTIONS OF CLEANUP EFFORT

Perceptions from the community toward studying and cleaning up the Site have generally been positive. It has been communicated with emphasis that the USFS CERCLA 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 practices at the former uranium mine located at Bokan Mountain, which is directly adjacent to the primary area of interest for rare earth metals. Site cleanup alternatives encompass mineral development interests in the area to the extent practicable and within constraints of CERCLA.

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 during past meetings:

**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 largely 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 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 affects, be transferred to human 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 attractive. The SCR and 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 as delineated in the EE/CA alternatives.

**I am wondering if the earthquake we had a few years back would have affected 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, the CERCLA process (law) must be followed by the USFS.

Site cleanup alternatives encompass mineral development interests in the area to the extent practicable and within constraints of CERCLA.

**Can you talk about worst case scenarios...if someone walked thru 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.

## 5.0 COMMUNITY ENGAGEMENT PLAN

The overall goal of the Community Engagement Program is to maintain and promote communication between citizens, tribes, and the agencies involved in the project, and to provide opportunities for meaningful and active involvement by the community in the cleanup process. The USFS Alaska On-Scene Coordinator (OSC) is the focal point of coordinating the activities described below.

### 5.1 DESIGNATED SPOKESPERSON

Michael Wilcox, the Site OSC, is designated as the USFS spokesperson for the Ross-Adams Site cleanup and other related issues regarding the Ross-Adams Site cleanup on National Forest Service (USFS) land, and serves as the primary point of contact for community members, tribes, regulatory agencies, and all stakeholders relating to the USFS as it pertains to cleanup of the Site.

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

In addition to the USFS, other regulatory agencies involved in the Site cleanup process include ADEC and EPA. Community members, interest groups, Hydaburg Cooperative Association, OVK and UCore have expressed interest in the cleanup process. ADEC, EPA, Hydaburg Cooperative Association, and OVK were involved in the planning for the ESI and review of the SCR and Draft EE/CA. The OSC serves as the liaison and point of contact with citizens, regulatory agencies, tribes, UCore, and other stakeholders.

### 5.3 COMMUNITY INTERACTION

The objective of community interaction is to obtain, synthesize, and apply relevant and appropriate community and key contact information necessary to provide continued community interaction with regards to 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 stakeholders 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 in the form

of Fact Sheets, flyers, and posters at various meetings, forums and symposiums as well as emails from the OSC.

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

An Administrative Record has been maintained for the Site by the OSC. The Administrative 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. A web link to access the Administrative Record is available at <http://www.Ross-Adams-EECA.com>.

## 5.6 CONDUCT AND FACILITATE PUBLIC MEETINGS

The OSC will coordinate and schedule, prepare for, and attend all announced meetings to update the community on Site developments and address community questions, concerns, ideas and comments. The OSC will provide notice of scheduled meetings.

## 5.7 SOLICIT COMMENTS DURING THE EE/CA PUBLIC COMMENT PERIOD

The EE/CA is available to the public for a 30 day public comment review period beginning May 1, 2015 to give community members an opportunity to review and comment on the documents, especially the preferred alternative proposed in the EE/CA for Site cleanup. This process offers the community, tribes, and all stakeholders the opportunity to provide input and comment for the OSC to take into consideration when making decisions about the Site cleanup. At the commencement of the public review and comment period, the OSC will announce the comment period for the EE/CA in the Ketchikan Daily News, Juneau Empire, other local newspapers as appropriate, and through other means.

## 5.8 REVISE THE COMMUNITY ENGAGEMENT PLAN

The OSC will revise and distribute the Community Engagement Plan to address community needs, issues, or concerns regarding the Site or the cleanup remedy that are not currently addressed in this Community Engagement Plan, as well as update the plan to reflect current progress and information throughout the project, as necessary.

## 5.9 KEY CONTACTS

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