



United States Department of the Interior



BUREAU OF LAND MANAGEMENT
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MAY 19 2014

In Reply Refer To:
3720 (AKA010)
AA-082264

CERTIFIED MAIL 7004 1350 0002 0430 7886
RETURN RECEIPT REQUESTED

David Kutch, President
Georgetown Tribal Council
Native Village of Georgetown
5313 Arctic Boulevard, Suite 104
Anchorage, Alaska 99518

Dear President Kutch:

I am writing in response to your letter dated March 21, 2014, addressed to Red Devil Mine Project Manager Mike McCrum in which you transmitted comments by Georgetown Tribal Council on the early action planned for Red Devil Mine. The BLM acknowledges your council's support for the preferred alternative developed through the Engineering Evaluation/Cost Analysis.

Your council's response raised a number of specific questions regarding the early action and future remedial action at the Red Devil Mine site. Enclosed please find a list of responses to each of your questions.

Since the BLM last met with your council, we have acquired a contractor through the Corps of Engineers to perform the early action at the site. We anticipate the early action will be completed in 2014. While the early action is in progress, the BLM will continue to work with EPA and the State of Alaska to develop site-wide remediation alternatives as part of the feasibility study and transition into the next steps in the CERCLA process.

If you wish to discuss the project further, please contact me at 267-1246 or Mike McCrum at 271-4426.

The BLM appreciates your interest and participation in this project. We look forward to continued consultation and coordination with Georgetown Tribal Council as we move toward remedial action at the Red Devil Mine site.

Sincerely,

A handwritten signature in blue ink, appearing to read "Alan Bittner". The signature is stylized and cursive.

Alan Bittner
Field Manager

Enclosure

**Georgetown Tribal Council Comments and BLM Responses
Engineering Evaluation/Cost Analysis for the Red Devil Mine
March 2014**

1. How long after the "early action" phase is complete will BLM wait to continue with cleaning up the mine site?

BLM Response: We plan to finish the feasibility study, which defines the alternatives for action across the entire site, in 2014 and complete a record of decision in 2015. We will then begin planning and design for the site-wide action that we hope to begin implementing in 2017. We will remain in contact with Georgetown Tribal Council as we progress through the next steps in the CERCLA process.

2. Will funding be available?

BLM Response: The BLM is working with the Department of the Interior to secure funding for the time period when it will be needed.

3. What is being done to ensure that the timeline holds fast and funding will be available?

BLM Response: The Red Devil Mine project is a high priority for the BLM and we are working in close coordination with the EPA and four State agencies. We will continue to communicate regularly with potentially affected tribes and communities and seek their input at key steps in the project. The BLM continues to place a high priority on both funding for Red Devil and on maintaining a coordinated and transparent project approach.

4. The GTC agrees with the EE/CA that Alternative 4 seems like the best way to go about minimizing the current issue. The BLM plans to move contaminated soils to higher ground and that's where the second concern comes in – *putting the contaminated soil on higher ground increases the potential of runoff from carrying these contaminants to lower elevations, and back into the creek and/or river.* How will these tailings be covered? Will the material being used prevent rainfall and snow melt runoff from carrying the contaminants with it? The GTC would like the BLM to ensure that after re-locating the tailings to higher ground, appropriate consideration is taken to what is done with it to prevent exposure to the elements.

BLM Response: The BLM recognizes that preventing mobility of mercury, arsenic and antimony is critical to the success of any repository constructed to hold tailings. Stockpiles created as part of the early action will be covered with a 12 mil thick geomembrane capable of preventing water infiltration and fugitive dust generation. Preventing water infiltration and dust generation will be critical design criteria for the repository cap should that alternative be selected for site-wide remediation.