

# Abandoned Uranium Mines Working Group Communications Strategy

December 31, 2022

## Purpose

Through the strategy outlined in this document, the Abandoned Uranium Mines Working Group (AUMWG) members will deploy an assortment of partnership and engagement opportunities to increase collaboration with communities, local governments, states, tribes, and stakeholders as the members collectively address the human health, safety, and environmental challenges posed by abandoned uranium mines (AUMs) across the United States.

## Introduction

The AUMWG is a consortium of federal agencies working together to address the human health, safety, and environmental challenges posed by the nation's approximately 4225 abandoned mines resulting from legacy defense-related uranium mining. By marshalling and leveraging the resources of multiple federal agencies, the group works with states and tribes to identify and address high-priority mines in an effective and coordinated manner.

The AUMWG was formed to provide a common framework for leveraging and optimizing each agency's limited resources to quantify the magnitude of the problem posed by AUMs and to assess and prioritize risks. The AUMWG holds quarterly teleconference calls and implements an action plan as part of the strategy to facilitate the sharing of information, site-specific data, and the status of mine activity to address AUMs using a coordinated approach on a national scale.

Each agency operates under its own mission and authority to contribute to this collaborative effort. Communications related to AUMWG activities will reflect appropriate coordination. As each agency engages its partners and stakeholders, the highlights of those activities will be shared with the group.

The AUMWG recognizes the importance of the meaningful participation of stakeholders and will enhance engagement with stakeholders to ensure the transparency of Defense-Related Uranium Mines (DRUM) Program and abandoned mine lands (AML) activities. The approach outlined herein is designed to be dynamic and adaptable and will evolve based on implementation results and ongoing input from stakeholders and the working group. The AUMWG, through its member agencies, will build stronger strategic partnerships with stakeholders to implement its recommendations for addressing the legacy of AUMs.

## **Background**

The AUMWG identified numerous recommendations to address the human health, safety, and environmental challenges posed by AUMs across the United States resulting from legacy defense-related uranium mining operations. Successful implementation of these recommendations requires strong strategic partnerships and meaningful engagement with stakeholders. Such strong partnerships and engagement will serve as the underpinnings of this strategy and the work of each agency in moving forward.

To inform this communication and engagement strategy, a brief description of the AUMWG's ongoing activities, and the role of each partner, is provided here.

### ***U.S. Department of Energy (DOE)***

DOE's Office of Legacy Management established the DRUM Program after the *Defense-Related Uranium Mines Report to Congress* (Report to Congress) was completed in August 2014. The DRUM Program is a partnership between DOE, federal land management agencies, and state AML programs to verify and validate the condition of DRUM sites on public, private, and tribal land.

DOE will complete DRUM Program Campaign 1, which involves inventory and assessment of mines on public land, by March 31, 2024. With interagency collaboration, DOE initiated DRUM Program Campaign 2, which involves inventory and assessment of mines on tribal land, in fiscal year (FY) 2022 and will continue the campaign until September 30, 2027. Upon completion of the fieldwork for Campaign 1, DOE will initiate DRUM Program Campaign 3, which involves inventory and assessment of mines on private property. In FY 2021, DOE started working with partner land management agencies on the reclamation of physical safety hazards which represent an immediate threat to human health and safety. DOE plans to continue work to remedy physical safety hazards which represent an immediate threat to human health and safety through the end of FY 2030.

### ***U.S. Environmental Protection Agency (EPA)***

EPA is continuing efforts to assess and clean up abandoned mines on the Navajo Nation and in New Mexico. This includes implementing the Tronox Inc. settlement, overseeing multiple settlements, and conducting fund-lead response actions, such as replacing contaminated structures. Groundwater and surface contamination from uranium mining is a concern of communities and stakeholders in areas where there are AUMs. A major focus of EPA will be the oversight of potentially responsible party (PRP) investigations and response actions in the San Mateo Creek Basin within the Grants Mining District. EPA will also be coordinating closely with the Navajo Nation on the selection of cleanup options for several large mine sites in the Eastern AUM Region of the Navajo Nation. EPA will also collaborate with DOE's DRUM Program to assess AUMs on the Navajo Nation that are not funded under existing settlements.

### ***U.S. Bureau of Land Management (BLM)***

BLM will continue its current response actions at DRUM sites. BLM currently leverages program funding, existing agreements, and available federal funding with states to continue state-by-state inventories, risk assessments, response actions, and resource sharing. The BLM National Office, National Operations Center, and various state offices work with state governments and DOE to combine expertise and identify appropriate processes and methods to address these mines.

### ***U.S. Forest Service (USFS)***

USFS will continue the assessment and cleanup of AUM sites to a degree commensurate with annual funding and the consideration of other priority projects. USFS is currently partnering with EPA Region 6 on implementing the *Assessment of Health and Environmental Impacts of Uranium Mining and Milling, Five-Year Plan Grants Mining District, New Mexico*. USFS is also partnering with other EPA regions, as well as states and DOE, to leverage agency resources and collectively address AUMs on USFS-managed land.

### ***U.S. Bureau of Indian Affairs (BIA)***

As a trustee for all tribal mine sites, BIA will participate in community outreach efforts, ensuring that tribes are informed and consulted both formally and informally. BIA will monitor the ongoing work at tribal mine sites and provide long-term monitoring of institutional controls and completed remedies applied to tribal lands. BIA will assist EPA, other agencies, and PRPs with access to trust lands and allotments for assessment and cleanup purposes.

### ***National Park Service (NPS)***

NPS is investigating the nature and extent of contamination at the Orphan mine site, which is in the Grand Canyon National Park, using its authority under the Comprehensive Environmental Response, Compensation, and Liability Act. NPS intends to identify a recommended cleanup action for a portion of the upper mine area in the near term and address the lower mine area in the future, as they are generally inaccessible to park visitors.

### **Strategy**

The following is the AUMWG's broad approach to building a communications and engagement strategy that is inclusive of all stakeholders.

## ***Strengthening Partnerships and Tribal Engagements***

The AUMWG, through its member agencies, will conduct meetings, webinars, and other interactions to establish and strengthen partnerships and engagements. The dialogues will evolve based on the results of feedback from the AUMWG partners as AUM activities are being implemented. Initial engagements will focus on:

- ***States:*** There are several abandoned mine sites on state-managed land. The AUMWG representative, when appropriate, will work with the various state divisions, departments, bureaus, and programs (such as AML, environmental, and public health programs) to execute AUM activities. Maintaining strong working relationships with states during AUM activities is crucial to meeting the working group's shared objectives.
- ***Tribal governments:*** Many abandoned mine sites are on or could potentially impact tribal lands. The AUMWG representative, when appropriate, will work with tribal governments and programs (such as the Navajo Abandoned Mine Lands Reclamation Department and the Navajo Nation Environmental Protection Agency) to develop a regular engagement process during the implementation of AUM activities. The essential reason for tribal consultation is to identify the cultural values, religious beliefs, traditional practices, and legal rights of Native nation people, which could be affected by AUM activities. Engaging tribal governments has four essential elements:
  1. Identifying appropriate tribal governing bodies and individuals from whom to seek input
  2. Consulting with appropriate tribal officials or individuals and asking for their views regarding land use proposals or other pending AUM actions that might affect traditional tribal activities, practices, or beliefs relating to particular locations
  3. Treating tribal information as a necessary factor in defining the range of acceptable land management options
  4. Creating and maintaining a permanent record to show how tribal information was obtained and used in the decision-making process
- ***Local governments and regional authorities:*** Local governments and regional authorities may be involved in the acquisition, reclamation, and remediation of abandoned mines. The AUMWG representative, when appropriate, will conduct outreach with local governments and regional authorities to get their input on the implementation of AUM activities.
- ***Environmental and community-based organizations:*** The potential environmental and community concerns about abandoned mines are important to understand and address during the implementation of AUM activities. The abandoned mine sites may be connected with complex environmental, technical, political, and economic issues, potentially related to their often remote locations, the magnitude and scale of their contamination, and their occasional location partially on public land and partially on private property. Complying with appropriate environmental regulations is a top priority. Meaningful community participation is critical in addressing these challenges. Community involvement activities ensure that all stakeholders are informed of site reclamation and cleanup activities and can

influence mine cleanup and reuse decisions. The AUMWG representative, when appropriate, will conduct the following engagements:

1. Engage environmental and community-based organizations in dialogues about the reclamation and cleanup of sites
  2. Support the engagement of communities to establish goals for the reuse and redevelopment of sites
  3. Develop a database of key contacts in communities working to reclaim, clean up, and redevelop sites
  4. Provide public notice of National Environmental Policy Act-related and Superfund-related hearings and public meetings and of the availability of environmental documents that can inform those persons and agencies who may be interested or affected
- **Industry, contractors, and PRPs:** Industry, contractors, and PRPs all play critical roles in the implementation of AUM activities. The AUMWG representative, when appropriate, will engage this stakeholder group to facilitate the reclamation and cleanup of abandoned mine sites. It is important to assist these parties in their efforts to help the AUMWG reclaim and cleanup sites.

The working group's industry partners are often the best source of information, so productive engagement with industry partners is necessary to ensure that the working group clearly understands the marketplace, develops well-thought-out acquisition strategies, and utilizes technological advances. Early, frequent, and constructive engagement with industry is especially important for AUM activities.

- **Other federal agencies:** The AUMWG representative, when appropriate, will encourage the collaboration of partner agencies when implementing AUM programs. In addressing the hazards posed by abandoned mines, the agencies must work together as one government to achieve shared objectives in an efficient and cost-effective manner. The agencies are interdependent, or mutually reliant on each other, and can save money by jointly coordinating efforts, improving communication, sharing information, and eliminating duplication. For instance, BIA will assist DOE in obtaining access across tribal trust land so that DOE's DRUM Program may inventory mines on BLM-managed land.

### ***Ensuring Participation and Transparency***

Transparent and clear communication of information and decision-making processes are essential to maintaining public trust and involvement in AUM activities. The AUMWG, through DOE, will take the following steps:

- [1] The AUMWG will maintain a webpage to inform the public and a broad range of partners, stakeholders, and tribes about the status and results of AUM activities
- [2] The AUMWG will feature information about events and other opportunities for public participation, input, and comment, as well as stakeholder engagement, on its webpage

- [3] The AUMWG will develop and post fact sheets, announcements, and other information about the progress and results of AUM activities as they are implemented and completed
- [4] The AUMWG will develop and deploy both traditional and digital mechanisms for outreach, information sharing, and solicitation of input and comments, making sure information is translated into a form that can be readily understood by communities
- [5] The AUMWG will prepare an Annual Stakeholder Report that summarize the year's accomplishments and the benefits to various stakeholders

### ***Engaging U.S. Government Oversight Organizations***

To improve the delivery of AUM services for U.S. citizens and maintain transparency within governmental processes, the AUMWG, through its member agencies, should engage the entities that authorize, fund, and oversee its performance. To the extent that a recommendation is presented to any of the bodies below on behalf of the AUMWG, that position shall be vetted by the working group, as appropriate, within each participating agency. As such, the AUMWG will engage, as appropriate, the following oversight organizations:

- ***U.S. Office of Management and Budget (OMB)***: The AUMWG representatives, when appropriate, will engage with OMB to enable AUM activities, since it prepares the president's budget proposal to Congress and supervises the administration of the agencies. It is important to engage OMB, since it evaluates the effectiveness of agency programs, policies, and procedures; assesses competing funding demands among agencies; and sets funding priorities. Ultimately, OMB ensures that agency reports, rules, testimony, and proposed legislation are consistent with the president's budget and with administration policies.
- ***U.S. Congress***: The AUMWG representatives, when appropriate, will engage with Congress to address concerns with and report on AUM activities, as was done through the 2014 DRUM Report to Congress. Congress takes an active interest in its constituents' inquiries and will insist that each be given sympathetic consideration, equitable treatment, and timely response. The AUMWG will facilitate these inquiries in a timely and accurate manner.
- ***U.S. Government Accountability Office (GAO)***: The AUMWG representatives, when appropriate, will engage GAO to address concerns with and report on DRUM and AML activities. GAO provides fact-based, nonpartisan, and balanced information to Congress, seeking to enhance the economy, efficiency, effectiveness, and credibility of the federal government. Often called the "Congressional watchdog," GAO investigates federal spending and performance. The AUMWG will facilitate any audits, evaluations, investigations, and engagements, as appropriate.

### ***Providing Training, Education, and Outreach***

DOE, or another AUMWG member, will work to expand the knowledge base on AUMs through several mechanisms, such as education collaborations, training programs, and outreach initiatives and will share information with the AUMWG. This is an important aspect of the

working group's strategy. Members should share their experiences and expertise in these training, education, and outreach sessions. Participation in the following efforts will help to further these objectives:

- **Professional forums:** The AUMWG representative, when appropriate, will engage with professional forums that bring together representatives from across government, industry, and academia that may influence policy development or the implementation of reclamation, remediation, or postclosure management of mining and milling sites. One such forum is the Federal Mining Dialogue (FMD), which comprises U.S. federal environmental and land management agencies. The FMD oversees the environmental, health, and safety impacts of AUMs across the country.
- **Training:** The AUMWG representative, when appropriate, will provide training and observation opportunities for federal, state, local, and tribal officials when conducting AUM activities.
- **Science, technology, engineering, and mathematics (STEM):** The AUMWG representative, when appropriate, will engage STEM education programs to increase awareness, provide education, and bring science directly to the public, especially K-12 students from low-income populations.
- **International engagements:** The AUMWG representative, when appropriate, will work with the international community (for example, through the International Atomic Energy Agency) to share best practices; transfer information and knowledge; understand the safety, environmental, and social requirements of uranium mining; and develop guidance for the reclamation and remediation of uranium mining, milling, and other legacy nuclear sites around the world.

## **Summary**

Through this strategy, the AUMWG members will deploy an assortment of partnership and engagement opportunities to increase collaboration with communities, local governments, states, tribes, and stakeholders. The AUMWG recognizes the importance of the meaningful participation of stakeholders and will enhance engagement with stakeholders to ensure the transparency of AUM activities. The working group will continue to build the AUM network and to identify available resources and expertise at federal, state, and tribal levels to address the human health, safety, and environmental challenges posed by AUMs across the United States.