

Abandoned Uranium Mines Working Group Communications Strategy

December 6, 2019

PURPOSE

Through this strategy, 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 we collectively address the human health, safety, and environmental challenges posed by abandoned uranium mines 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 approximate 4,225 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 the abandoned uranium mines (AUM) and to assess and prioritize risks. The AUMWG holds quarterly teleconference calls and implements an action plan as part of the strategy to facilitate information sharing, site-specific data, and mine activity status to address AUM using a coordinated approach on a national scale.

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

The AUMWG recognizes the importance of meaningful participation of stakeholders and will enhance engagement with stakeholders to ensure transparency of DRUM and AML activities. The approach outlined below is designed to be dynamic and adaptable and will evolve based on implementation results and ongoing input from stakeholders and the group. The AUMWG, through its member agencies, will build stronger strategic partnerships with stakeholders to implement its recommendations to address the legacy posed by the AUM.

BACKGROUND

The AUMWG identified numerous recommendations to address the human health, safety, and environmental challenges posed by abandoned uranium mines 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 going forward.

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

U.S. Department of Energy

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

The DOE will complete Campaign #1, inventorying mines on public land, in FY2022. With interagency collaboration, DOE will initiate Campaign #2, inventorying and assessing mines on Tribal land in FY2023. Within the following year, DOE will initiate Campaign #3, inventorying and assessing mines on private property. In FY2021, DOE will work with partner land management agencies on reclamation of physical safety hazards which represent an immediate threat to human health and safety.

U.S. Environmental Protection Agency

The EPA is continuing efforts to assess and cleanup abandoned mines on the Navajo Nation and in New Mexico. This includes implementing the Tronox settlement, overseeing the Freeport McMoRan and Navajo Trust 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 where uranium mines are located. A major focus of EPA will be oversight of PRP investigations and response actions in the San Mateo Creek Basin within the Grants Mining District. The EPA will also be coordinating closely with the Navajo Nation on the selection of cleanup options for several large mine sites in the Eastern Region of the Navajo Nation. The EPA will also collaborate with the DOE DRUM program to assess AUMs on the Navajo Nation that are not funded under existing settlements.

Bureau of Land Management

The BLM will continue current response actions on DRUM sites. The 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 Washington Office, National Operations Center, and various state offices work with the states

and DOE to combine expertise and identify appropriate processes and methods to address these mines.

U.S. Forest Service

The Forest Service will continue assessment and cleanup of AUM sites commensurate with annual funding and other priority projects. The Forest Service is currently partnering with EPA Region 6 on the *Assessment of Health and Environmental Impacts of Uranium Mining and Milling* in the Grants Mining District, New Mexico. The Forest Service is also partnering with other EPA Regions, as well as states and DOE to leverage agency resources and collectively address AUMs located on Forest Service-managed land.

Bureau of Indian Affairs

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. The BIA will monitor the ongoing work at Tribal sites and provide long-term monitoring of institutional controls and completed remedies applied to Tribal lands. The BIA will assist EPA, other agencies, and PRPs with access on trust lands and allotments for assessment and cleanup purposes.

National Park Service

The National Park Service is investigating the nature and extent of contamination at the Orphan Mine Site, located in the Grand Canyon National Park, using its CERCLA authority. The 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 engagements to establish and strengthen partnerships and engagements. The dialogues will evolve based on the results of feedback from our partners as AUM activities are being implemented. Initial engagements will focus on:

- ❖ **States:** There are several abandoned mine sites located 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, to execute AUM activities. Maintaining strong working relationships with states during our AUM activities are crucial to meeting our shared objectives.

❖ **Tribal Governments:** Many abandoned mine sites are located on or potentially impact tribal lands. The AUMWG representative, when appropriate, will work with tribal governments, such as the Navajo Nation AML and EPA programs, to develop a regular engagement process during the implementation of AUM activities. The essential reason for Native American consultation is to identify the cultural values, the religious beliefs, the traditional practices, and the legal rights of Native American people, which could be affected by our AUM activities. Engaging tribal governments has four essential elements:

- 1) Identifying appropriate tribal governing bodies and individuals from whom to seek input.
- 2) Talking with appropriate tribal officials and/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:** The 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, as appropriate, 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 involve complex environmental, technical, political, and economic issues, including the often-remote location, magnitude and scale of contamination, and mixed public and private land ownership. 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 reuse and redevelopment of sites.
 - 3) Develop a database of key contacts in communities working to reclaim, cleanup, and redevelop sites.
 - 4) Provide public notice of NEPA and Superfund-related hearings, public meetings, and the availability of environmental documents to inform those persons and agencies who may be interested or affected.
- ❖ **Industry, Contractors, and Potentially Responsible Parties:** 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 invigorate the reclamation and cleanup of abandoned mine sites. It is important to assist these parties in their efforts to help us reclaim and cleanup sites.

Our industry partners are often the best source of information, so productive engagement with our industry partners is necessary to ensure that we clearly understand the marketplace, develop well-thought out acquisition strategies, and utilize technological advances. Early, frequent, and constructive engagement with industry is especially important for AUM activities.

- ❖ **Other Federal Agencies:** The AUMWG representative, when appropriate, will foster the collaboration of partner agencies when implementing the AUM programs. In addressing the hazards posed by abandoned mines, the Agencies must work together as one government to achieve our 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, the Bureau of Indian Affairs will assist DOE to obtain access across Tribal-Trust land so that their DRUM program may inventory mines on BLM-managed land.

Ensuring Participation and Transparency

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

- ❖ The AUMWG will maintain a web page to inform the public and a broad range of partners, stakeholders, and tribes about the status and results of AUM activities.
- ❖ The AUMWG will feature information about events and opportunities for public participation, input and comment, and stakeholder engagement on its web page.

- ❖ 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.
- ❖ The AUMWG will develop and deploy both traditional and digital mechanisms for outreach, information sharing, and seeking input and comments, making sure information is translated into a form that can be readily understood by communities.
- ❖ The AUMWG will prepare an Annual Stakeholder Report that summarize the year’s accomplishments and benefits to various stakeholders.

Engaging U.S. Government Oversight Organizations

When it comes to improving the delivery of AUM services for U.S. citizens and maintaining transparency within government processes, the AUMWG, through its member agencies, should engage the entities that authorize, appropriate, and oversee our performance. To the extent that a recommendation is being presented to any of the bodies below on behalf of the AUMWG, that position shall be vetted with the group, as appropriate, within each participating agency. As such, the AUMWG will engage, as appropriate, the following oversight organizations:

- ❖ ***Office of Management and Budget:*** The AUMWG representatives, when appropriate, will engage with OMB to enable AUM activities, since they prepare the President's budget proposal to Congress and supervise the administration of the Agencies. It is important to engage OMB, since they evaluate the effectiveness of Agency programs, policies, and procedures, assess competing funding demands among agencies, and set 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, such as the 2014 DRUM Report. Congress takes an active interest in their constituents’ inquiries and will insist 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:*** The AUMWG representatives, when appropriate, will engage GAO to address concerns with and report on DRUM and AML activities. GAO provides fact-based, non-partisan, 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

our federal spending and performance. The AUMWG will facilitate these audits, evaluations, investigations, and engagements, as appropriate.

Providing Training, Education, and Outreach

The DOE, or other AUMWG member, will work to expand the knowledge-base of abandoned uranium mines through several mechanisms, such as education collaborations, training programs, and outreach initiatives and share that with the AUMWG. This is an important aspect of our strategy. Members should share their experiences and expertise in these training, education, and outreach sessions. The following efforts will help to further our objectives:

- ❖ ***Professional Forums:*** The AUMWG representative, when appropriate, will engage professional forums that bring together representatives from across government, industry, and academia that may influence policy development or the implementation of reclamation, remediation, or post-closure management of mining and milling sites. One such forum is the Federal Mining Dialogue (FMD), which is comprised of U.S. federal environment and land management agencies. The FMD oversees the environmental, health, and safety impacts of abandoned mine lands 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 Math (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 in low-income populations.
- ❖ ***International Engagements:*** The AUMWG representative, when appropriate, will work with the international community, such as the International Atomic Energy Agency, to share best practices, to transfer information and knowledge, to understand the safety, environmental, and social requirements of uranium mining, and to 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 meaningful participation of stakeholders and will enhance engagement with stakeholders to ensure transparency of AUM activities. The 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 abandoned uranium mines across the United States.