

Bonita Peak CAG Comments

To: Katherine Jenkins, U.S. EPA, Region 8 via email jenkins.katherine@epa.gov

From: The Bonita Peak CAG

RE: The Bonita Peak Repository Interim Remedial Action

Date: August 25, 2020

The Bonita Peak Community Advisory Group (CAG) supports the development of a long-term repository for mine waste, including sludge generated at the Gladstone Treatment Plant, at the remediated Mayflower Tailings complex. We also wish to echo some of the comments given during the public comment meeting on August 11 by San Juan County Commissioners Pete McKay and Scott Fetchenhier.

If tailings pond #1 and #2 are used as a repository, we are concerned about how road access around the Mayflower Mill could affect parking and the overall experience of visitors to the mill. We are also concerned how equipment moving material to the ponds and then between the ponds as described in EPA's preferred alternative will create dust and affect the overall quiet experience of the hiking trail above the ponds that leads to Boulder Creek. We wish to see more details as to how EPA plans to mitigate those two issues.

As a related matter, we also support Charlie Smith's comments that any Interim Record of Decision (IROD) related to the repository needs have an overall transportation plan for how and when materials are transported from various locations in San Juan County to the site. Both the transportation plan (including dust mitigation on county roads) and a repository water quality monitoring plan should be reviewed by representatives of the local community.

We also note that it is much more cost effective to develop a repository on tailings pond #4 than on any of the other tailings ponds. The present value of development and maintenance of a repository at pond #4 is \$26,364 per 1,000 cubic yards of space, whereas the present value of development and maintenance of ponds #1 and #2 are \$96,119 and \$158,254 per 1,000 cubic yards respectively. Tailings pond #4 could handle 128 years of sludge that is currently generated at the Gladstone treatment plant, whereas ponds #1 and #2 would only hold 13 and 4 years of sludge respectively.

Given that development of pond #4 is much more cost effective and that access would not impact the Mayflower Mill, we feel that EPA should more closely consider development of a repository on pond #4 in stages, perhaps starting with the northeast side of the pond first. Just a tenth of the potential repository on pond #4 could store ten or more years of sludge from the

treatment plant, giving time for more investigation of potential metal loading from the pond to the Animas River. To the best of our knowledge, EPA would like to see more investigation of ponds #1 and #2 as well even though EPA's preferred alternative would initiate repository development on these sites starting next year. We're not clear as to why continued investigations can be conducted on ponds #1 and #2 concurrently with repository development but cannot be with pond #4. In addition, only one remediated pond would be disturbed with development of pond #4 as opposed to three ponds under EPA's preferred alternative.

Finally, we understand that there is not an opportunity to review and comment on more detailed plans on the repository development such as a transportation plan or water monitoring plan before an IROD is signed. Given that these detailed plans are the most important issues to the local community, we believe they should have been better fleshed out before the public comment period, and we still want the opportunity to review them.

Please let us know if you have any questions related to these comments.

Respectfully submitted,

A handwritten signature in cursive script that reads "Peter Butler".

Peter Butler, Ph.D.

Chair, Bonita Peak CAG