

# Bonita Peak CAG

Ms. Katherine Jenkins  
Community Involvement Coordinator  
U.S. Environmental Protection Agency, Region 8  
1595 Wynkoop Street  
Denver, CO 802002-1129

Oct. 26, 2020

Re: Bonita Peak Mining District Final Site Management Plan

Dear Ms. Jenkins:

The Bonita Peak CAG has only brief comments regarding EPA's Final Site Management Plan. Overall, we believe it is a well written plan for managing a large, bureaucratic process with multiple government agencies and hope it will lead to faster, actual remediation work than often happens at Superfund sites. In this context, we think that using an adaptive management approach method makes sense. However, we have two main concerns we wish to highlight.

First, as we expressed in our initial comments, we believe that local community interests should be more involved in developing Site Principles – goals, objectives, and site strategy – for the Bonita Peak Mining District Superfund site. As described in the plan, the Site Principles are developed by the different agencies, and local interests can then comment. We do not believe that this arrangement can be construed as a “seat at the table”, a concept that San Juan County, Silverton and others have insisted on since this site was first considered for inclusion on the National Priorities List. We are the ones who live with the landscape once the site work is complete and should have more input as to what that landscape should look like and how our tax dollars are spent.

Second, we are concerned about the amount of resources needed for implementing all the steps in this plan. Agency personal may be so focused on completing each stage of the process that they have little time to step back to consider the big picture, and the best and most efficient ways to improve environmental conditions. We do not believe that this site needs to be a thirty-year project, yet production of the plan indicates that EPA is settling in for the long haul.

In addition to these two main comments, we have some very minor, specific comments we've attached in the document file. Thanks for your consideration of our comments.

Regards,



Peter Butler, Ph.D.

Chairman, Bonita Peak CAG