

FINAL

Final Community Involvement Plan

Clark Fork River Operable Unit
Milltown Reservoir/Clark Fork River
Superfund Site

Montana Department of
Environmental Quality

November 2012



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Clark Fork River Operable Unit Milltown Reservoir/Clark Fork River Superfund Site

November 2012

Prepared for

Montana Department of Environmental Quality

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Appendix A. Community Profile

Appendix B. Individual Comments Compiled from Interviews

Appendix C. Copies of River Review Fact Sheets

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Appendix E. Background Information

Acronyms and Abbreviations

ARCO	The Atlantic Richfield Company
BMPs	best management practices
CD	consent decree
CIP	community involvement plan
CFROU	Clark Fork River Operable Unit
CFRTAC	Clark Fork River Technical Assistance Committee
DEQ	Montana Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
ERA	ecological risk assessment
FS	feasibility study
HHRA	human health risk assessment
ICs	institutional controls
LEPC	Local emergency planning committee
NGO	non-government organization
NPL	National Priorities List
NPS	National Park Service
NRDP	Natural Resource Damage Program
OU	operable unit
PRP	Potentially Responsible Party
RI	remedial investigation
RipES	Riparian Evaluation System
ROD	record of decision
Site	Milltown Reservoir/Clark Fork River Superfund Site
SMOA	Site-specific memorandum of agreement

Section 1 - Community Issues and Concerns

This Community Involvement Plan (CIP) is the plan that the Montana Department of Environmental Quality (DEQ) will use to communicate with stakeholders and the general public regarding the remediation activities of the Clark Fork River Operable Unit (CFROU) of the Milltown Reservoir/Clark Fork River Superfund Site (the site). The CIP identifies issues of concern to residents of the area surrounding the site – portions of Deer Lodge and Powell counties – and outlines outreach activities that DEQ intends to implement to address those concerns, as well as a timeline for implementation. This is considered a dynamic document that project staff and public information coordinator should evaluate at least once a year for what’s working and what’s not. Changes will be made accordingly.

This CIP covers public involvement activities with respect to remediation, or cleanup to standards protective of human health and environment. It does not include the restoration component, which is work beyond remediation. It has been prepared following guidance from EPA’s *Community Relations in Superfund: A Handbook and Superfund Community Involvement Handbook*. It also incorporates 2011 updates to that guidance that are posted on EPA’s community involvement website. It is a flexible document that will continue to evolve, and DEQ invites public comment and discussion at any time. Readers are encouraged to participate in the communication process and may contact the designated DEQ staff with any questions, comments, or suggestions for improvement. Contact information is provided in Section 2.

DEQ’s objectives for community involvement in the communities surrounding the site are to:

- Involve the public in activities related to site remediation.
- Identify the best way to communicate information to the public.
- Inform the public of planned or ongoing actions.
- Identify and resolve conflict.

DEQ as lead agency will oversee, manage, coordinate, design and implement the Remedial Action for the Clark Fork Site, in consultation with the Environmental Protection Agency (EPA) (and the National Park Service (NPS) for remedial activities on the Grant-Kohrs Ranch). DEQ will coordinate with the Natural Resource Damage Program (NRDP) for the implementation and integration of Restoration components into the work. DEQ will coordinate with NPS to implement the Federal Restoration Plan at Grant-Kohrs Ranch. A primary function of consultation and coordination between the agencies is to understand and receive information to be collected; understand how that information is to be analyzed; provide review and comment; and maximize the use of the resources available for the environmental benefit to the Clark Fork Site in the successful and cost-effective completion of the work.

The CIP relies heavily on personal interviews with stakeholders and the general public that were conducted as part of the CIP preparation process. It provides opinions and concerns of the interviewees and not those of DEQ or EPA. The information developed through the interviews and summarized in the CIP reflects interviewees’ responses and perceptions of the proposed cleanup activities, regardless of whether those responses are factually precise. The CIP will serve as a basis for addressing community concerns and for clarifying misinformation identified in community responses.

The CIP is structured in the following format:

- **Section 1. Community Issues and Concerns.** Provides a summary of the information that is important to the community as determined from the community interviews.
- **Section 2. Community Involvement Action Plan.** Provides DEQ's plan of action for implementing community engagement activities to address community issues and concerns.
- **Section 3 – Site Timeline and Proposed Schedule.** Presents a broad overview of the site timeline to date and a schedule for the future.

Supporting information for these sections is provided in Appendices A through D.

1.1 Community Interviews

Community interviews were conducted between October 2011 and January 2012. The objective of the interviews was to find out how to best keep the public informed and involved as the project progresses. A total of 29 people were interviewed. Six additional people were contacted, but opted not to be interviewed. One third of the interviewees came from a list of suggestions provided by the Clark Fork River CIP Planning Team. The rest of the people were contacted because they were suggested in the course of the interviews. Interviewees included landowners along the Clark Fork River, city and county officials, nonprofit environmental representatives and business people in the Deer Lodge and Anaconda areas. A total of 17 face-to-face interviews were conducted initially. Based on input from these interviewees, 12 additional interviews were conducted by phone to capture input from as many stakeholders as possible.

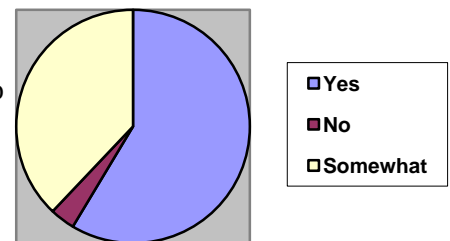
Interviews typically lasted between half an hour to one hour. Each interviewee was asked a list of 12 questions to determine their knowledge of the site, interests, concerns, and preferred methods of receiving information about the site. Those questions are provided below. In conjunction with the community interviews, DEQ reviewed available demographic and economic data to construct a community profile of the areas surrounding the site. That information is provided in Appendix A.

1.2 Results

The following summarizes the responses to questions asked during the interview. The individual comments from which these summaries were prepared are provided as an appendix (Appendix B). This allows the comments to be retained in the document, as a valuable resource for details on community concerns.

1.2.1. Have you actively investigated and learned about the Clark Fork River Superfund Site?

Most people interviewed answered yes to this question. Some were aware of the site through their jobs, while others became involved due to an interest in what was happening on or near their property or community. In general, those owning property on the river were more aware of site activities.

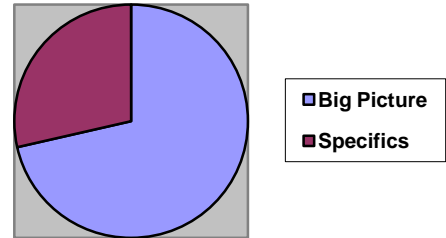


Many felt that, although they tried to keep up with the site, their level of knowledge was fairly big picture and they were not aware of specific details. People's knowledge of the site came from a wide variety of sources, including: attending public meetings, talking with land surveyors on their property,

reading ads, talking to project personnel, serving on committees, interest in bird watching, and teaching. The people who felt they had the most detailed knowledge of the site were those who represented agency partners at the site (e.g., the National Park Service at the Grant Kohrs Ranch). The individual comments are presented in Appendix B.

1.2.2. What do you know about the site?

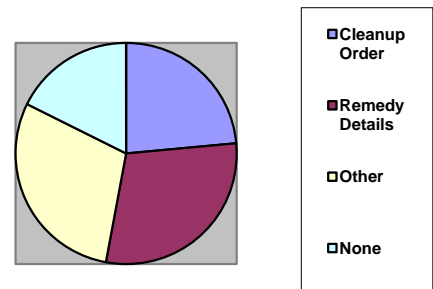
Most people interviewed had a general, “big picture” understanding of the overall Superfund site, including the mining history, the length of the site, the communities involved, significant incidents that caused contamination, or major cleanup activities that had taken place (such as Milltown Dam removal). Several of these people were long time residents who remembered details such as the river “running red” when they were children. Everyone knew that the government had been involved at the site for a long-time, although the details of who was leading what portion of the investigation or cleanup were rarely mentioned.



A smaller number of the interviewees had very specific, focused knowledge of the CFROU itself and particular issues related to it. These people were generally people who either owned property that was impacted by cleanup, or who worked for local government or public interest groups. The individual comments are presented in Appendix B.

1.2.3 Do you have any particular concerns about the site?

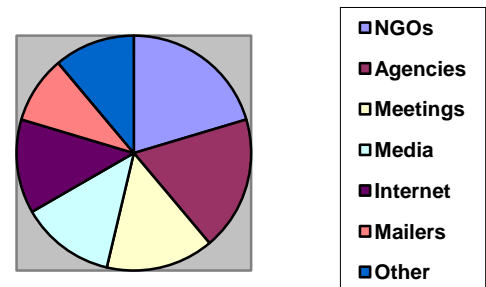
Most people interviewed had at least one concern related to the site. The most common concerns were those that could be categorized as having to do with remediation details. Those included issues with: revegetation, weed control, waste left in place, treatment versus removal, and flood control. The order of cleanup was mentioned at least eight times, with the concern being that by not cleaning up from upstream to downstream, the site risked recontamination of areas that had been cleaned “out of order.” Several people were concerned that the removal of Milltown Dam could also lead to further contamination or recontamination..



Almost half of the comments fell into the “other” category. These included: landowner involvement, human health, apathy, sustainability, cost, length of cleanup, and agency interrelationships. A significant number of interviewees reported that they had no particular concerns. Individual comments are provided in Appendix B.

1.2.4 Where do you get your information about the site?

Interviewees used a wide variety of sources to obtain information about the site. The majority of people accessed information from more than one source. Of the people who accessed multiple sources, the most commonly mentioned information sources in order of frequency (high to low) were: agencies, newspapers, mailings, other, internet, and non-government agencies (NGOs) such as the Clark Fork Coalition and the Clark



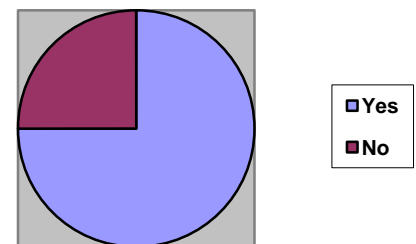
Fork River Technical Assistance Group (CFRTAC). The “other” category included: attendance at clubs and talks with locals, including the conservation district.

Of people who accessed only one source, four sources were mentioned with almost equal frequency (DEQ, NGOs, newspapers, and meetings). Face-to-face and public meetings are favored overall as the method of communication. Individual comments are provided in Appendix B.

1.2.5 Have you attended any meetings or participated in other activities regarding the site? If yes, what did you find useful? If no, were there reasons for not attending?

Meeting attendance among interviewees was very high. A total of 75 percent of the people reported that they had attended one or more public meetings. Many seemed to be very involved and had attended multiple meetings over a long period of time.

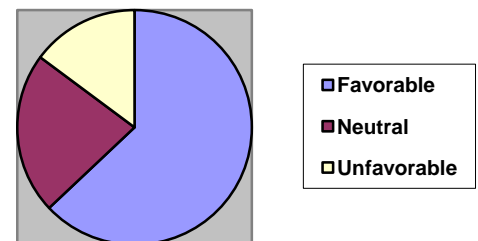
Most of the people who attended the meetings found them to be useful. The things most commonly mentioned as being valuable about meetings were: learning the history of the site, making face-to-face contact, an ability to get up to speed with project details, and an opportunity to get updates on work plan changes. Several people who had attended meetings had not attended a public meeting specifically for the Clark Fork River OU, but had attended a meeting for another portion of the site.



Seven interviewees indicated they had not been to any public meetings regarding the OU. Reasons for not attending meetings, within both groups, varied. The primary reasons given were a lack of available time and a belief that public input didn’t have an impact on the project. Several interviewees mentioned community apathy because the Superfund process began on the site almost 20 years ago, but many of these interviewees also said that community members would be more likely to re-engage if they saw work on the ground. No one mentioned a particular issue with a meeting location or time. Individual comments are provided in Appendix B.

1.2.6 Did you know that DEQ is responsible for leading the cleanup at the site? If so, what is your opinion of the work that they are doing?

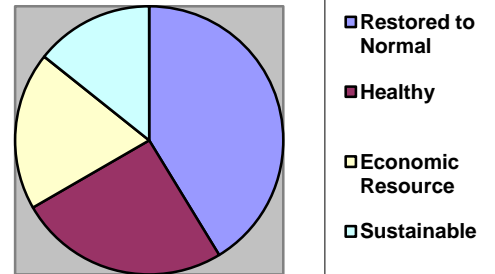
Only two of the people interviewed said that they did not know that DEQ was responsible for leading the cleanup at the site. This is a higher percentage than would be expected, given that the public often have a hard time differentiating between state and federal regulators. One person thought that EPA had the lead and another thought that ARCO was responsible. It is likely that the number who didn’t understand that DEQ had the lead for cleanup is higher than was reported and that people may have been reluctant to admit that they did not know. One person expressed the opinion of many saying “Yes. I think that the site has been divided. EPA is the lead on this part, DEQ is the lead on that part...It is very confusing, not only for me, but certainly the general public cannot track on all of this.”



Most of the respondents (about 62 percent) said that they had a favorable view of the work that was being done by DEQ. A smaller percentage (22 percent) was neutral in their opinion, and only 14 percent had a negative opinion. Individual comments are provided in Appendix B.

1.2.7 What do you expect of DEQ regarding the cleanup of the site?

Almost all of interviewees expected a clean environment once the work was finished. For many, this meant a cleanup and restoration of the river to a state that was as close to normal or natural as possible. Although some people hoped for a blue ribbon trout stream, several people indicated that they didn't think that the river would ever be as productive as it was pre-mining. Terms used in describing their expectations included: *Make it whole again, done within a reasonable time and done right, done in the best possible way.* It was hoped that the slickens would be more productive than they are now. Some people also had an expectation for a healthy watershed, as well as a healthy river.

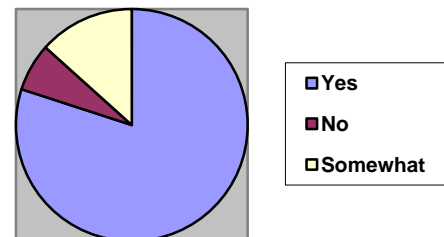


A remedy that was protective of human health was mentioned by almost half of the interviewees. Some people wanted it to be as protective as possible, while other indicated that they wanted the river cleaned to a reasonable set of standards and then wanted the agencies out of their hair. Interviewees also hoped that the cleanup would result in an attractive economic resource for the area.

Plans and funding for long term maintenance were also frequently mentioned. Several people indicated that it was their expectation that provisions be included that would allow for future contamination to be addressed after the agencies were done. For instance, if a flood event or change in the river channel exposed hidden contamination, a process would be in place that would address its cleanup. They also expected that DEQ would provide a venue for people to express their concerns long-term. Individual responses to this question are listed in Appendix B.

1.2.8 Would you like to be involved in the process? If so, how?

About two thirds of the people interviewed felt that they wanted to be involved in the process and that they were currently at a level of involvement that they were comfortable with. Some of these people were on multiple committees or boards – either as volunteers or through their jobs. Several people indicated that they had previously had a higher level of involvement or that their level of involvement cycled. People indicated that their interest in being involved increased when activities affected their land, and they expected that involvement would increase when the major cleanup began on the river. Several people mentioned that they knew who to contact (Brian Bartkowiak) if they wanted to be more involved.



The remainder of the interviewees felt that they wanted an increased level of involvement. These people included government officials and local residents. A former teacher would like to share information collected by his students and contribute to the scientific knowledge of the river, and a

representative of the Watershed Restoration Coalition wanted to be involved in testing grass seed for revegetation.

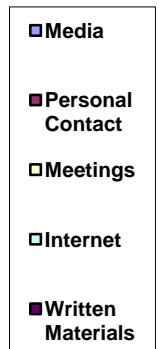
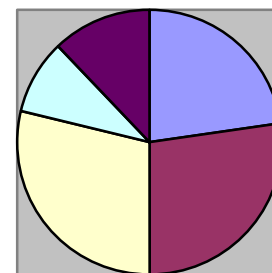
No one indicated that they wanted to be less involved than they were. Individual responses to this question are listed in Appendix B.

“Even if DEQ or EPA does good work, you need landowners to buy off on it. What will happen when everyone else is gone and something goes wrong? It shouldn’t be a landowner’s expense to maintain this work if it’s needed. It seems like the landowner was a second thought in the process and they should not be.”

1.2.9 What do you think is the best way to communicate with residents near the site?

Interviewees often mentioned that they believed that it was very difficult to get people interested in the activities that were planned at the site, because the Superfund process had been going on for such a long time. They felt that apathy was fairly common at the site, and that the situation wouldn’t change significantly until progress was celebrated or more visible.

People were torn on the usefulness of meetings. Public meetings were mentioned by over half of the interviewees as being necessary, but people also indicated that they were generally poorly-attended. It was suggested that attendance might increase if the location of the meeting was close to ranchers (such as at the fire hall). Newspapers were also mentioned as being an effective communication tool, although people indicated that they did not reach everyone in the community.



The most commonly mentioned communication tool for residents of the site was face-to-face communication. People indicated that, in rural communities, nothing beats being out in the field and speaking to people one-on-one. DEQ was encouraged to identify the target groups with the highest interest and go to them (e.g., sportsmen – the Anaconda Sportsman’s Club). These people would be the most likely to be engaged and ask questions at their regular meetings. Face-to-face communication also included coming to speak to the local government officials on a regular basis (e.g., commissioners, planners, mayor or CEO, weed board, etc.). Brian Bartkowiak’s presence in the community was favorably mentioned multiple times.

Other communication techniques that people suggested were:

- A listserve to provide regular email updates to community members.
- Newspaper articles or notices in the paper and community center facilities.
- An informative kiosk in the Courthouse
- Placards for placement at the Arrow Park or at any of the recreational trails the County is proposing.
- Work with the non-profits.

- Flyers, newsletters, and e-mails.
- Put a resident DEQ employee in Deer Lodge.
- Invite the public to see what has been done. Take adults and kids out on a tour. Have a celebration for milestones, such as an historic marker and dedication for completed segments.
- Put together a PowerPoint of historic pictures and comments from people that were around back then so that we could communicate these changes.

The point was made that DEQ must make sure things are happening on the ground at the same time that these communication efforts were ramping up. It was stated that the worst thing that could happen would be for the public to become reengaged and then to have nothing happen, especially if the slowdown was over an administrative detail or failure of the agencies to agree.

1.2.10 Who do you think are the formal and informal leaders of your community? Who do you trust?

Almost all interviewees had at least a few people they felt comfortable naming as formal or informal leaders of the community and people they could trust. In general, these names could be divided into five categories: Federal and state government, local government, local business people, community members, and groups. Members of the local government were mentioned most often. The greatest variety of individual names came from the community member category. The results of this question are useful in identifying potential resources for getting information to the affected community about the site. The number in parentheses indicates that an individual was mentioned multiple times.

Federal and State Government

- DEQ (2)
- EPA (2)
- USDA, Natural Resources Conservation Service and Farm Services Administration office (Gary Thompson and Susie Johnson)
- US Bureau of Land Management, DNRC
- Montana State Senators/ Representatives - Dave Lewis, Cindy Hiner, and Gene Vuckovich.
- Chas Van Genderen, State Parks Director, Helena
- NPS, Laura Rotegaard, Superintendent of Grant Kohrs Ranch

“EPA or DEQ have a lot of good people, but there’s so much turnover. So you think you’ve got a relationship with someone and then they’re gone. You get someone new with a completely different personality and a different take on things. Landowners get frustrated. I think they need some groups like Watershed Restoration Coalition and Conservation District to help with communication.”

Local Government

- Mary Ann Fraley – Mayor, Deer Lodge, Montana (5)
- Becky Guay - Chief Executive Anaconda-Deer Lodge County, Montana (2)

- Deer Lodge, Montana City Council (4), (Dave Austin City Council President)
- Anaconda-Deer Lodge and Powell County Commissioners (10), (Robert Pierce, Ralph Mannix, Connie Daniels)
- Powell County, County planner, Brian Bender (3)
- Local law enforcement (Scott Howard, Sheriff and Mike Mahoney, former warden)
- Powell County Attorney - Lewis Smith
- Powell County Treasurer - Lisa Smith

“That is a HARD question! I honestly think because of Superfund fatigue, there is not a whole list of community members that anyone trusts.”

Community Members

Sherm Anderson, Ted Beck, Julia Brewer, Artis Cotton, Bill Finnegan, Jim Flynn, Kayo Fraser, Betty Hoffman, John Hollenback, Karl Johnson, Evan Johnson, Rick Klein, Jim Kuipers, Dick Labbe, Milo Manning, Chris Marchon, Bob Meredith, Serge Myers, Cheryl Rosling, Jim Stone, Lorry Thomas, Joyce Sharf, Kirk Sandquist, and Bob Toole.

“I trust the landowners that most impacted by the Clark Fork. The people impacted by that - they are the leaders. They are the most affected by it. I trust how they feel and how it’s getting done, good or bad.”

Groups

- Service Clubs (Rotary and Elks Club)
- Business Groups (Chamber of Commerce and Stock growers Association)
- Environmental Groups (Clark Fork River Technical Action Committee and Clark Fork Coalition)
- Government organizations (Disaster and Emergency Services and Conservation District)
- Other (Lost Creek Fire Department)

1.2.11 Can you think of anyone else we should talk to?

Almost all interviewees offered one or more names for potential interviewees. Many of these names were also listed above as being people who were good sources of information and who could be trusted. Many of these people were interviewed for the CIP. The names of people who were suggested but for whom interviews could not be set up will be kept on a list for DEQ to contact informally at a later date.

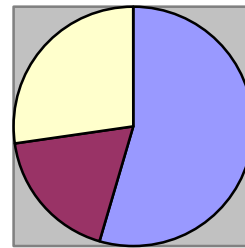
- Mary Ann Fraley – Mayor, Deer Lodge, Montana (5)
- Scott Howard - Sheriff
- Powell County Attorney - Lewis Smith
- Local government. Karen Laitala - weed management.

- City council (Jack Hinkle, Rex Anderson, and Dave Austin).
- County commission (Ralph Mannix, Neil Warner, and Mark Sweeney).
- Local citizens. Sherm Anderson (3), Bryce Andrews (2), Pat Banyon, Darryl Barton (2), Ted Beck, Gerald Bender, Fred Benson, Linda Best, Loraine Biggs-Halet, Alan Bird, Jim Davidson, Corkey Deaton, Rick Duncan, Richard Forson, Cathy and Wayne Hadley (2), John Hollenback (2), Helen Kellicut, Hans Lampert, E.G. Leipeimer, Steve Huey Long (2), McNeece, Ron Mjelde, Carl Nyman (2), Lars Olsen, Will Pauley, Paul Relf, Laura Rotegaard, Rodney Simpkins, Gary Swant, Melinda and Butch Riley, Bob Toole (3), Jules Weber (2),

1.2.12 Is there anything else you'd like to add?

A total of 23 the interviewees had additional parting information at the end of the interview. These comments are listed in Appendix B. Topics included:

- A desire for public health testing
- A need for a listserv to distribute updates and data
- Concern about revegetation issues
- Unhappiness with wastes being transported to Opportunity and a sense that Anaconda and Deer Lodge were being shortchanged in the process
- A desire for more outreach and listening from DEQ
- A call to use local resources when possible
- A hope that this Superfund site could be an international model



■ Assorted Issues
 ■ Thanks & Report Progress
 ■ PM is Doing Good Job

Several people thanked DEQ for conducting the interviews and for doing a good job, and urged DEQ to report progress and celebrate successes. Almost 30 percent of the people who had something to add volunteered that they thought that DEQ's project manager, Brian Bartkowiak, was doing a very good job. They were very impressed with the amount of time he spent in the community and at the individual properties on the site. They believed that having someone from DEQ be visible to the community was the most important thing that DEQ could do to engage the community.

Section 2 - Community Involvement Action Plan

This section describes specific activities that DEQ plans to undertake to actively engage the public at the site. These activities will generally be implemented by DEQ's project officer and public information officer, with support from contractors. These individuals are the primary contacts for the public regarding questions or concerns about the site.

The activities that DEQ plans to implement can be divided into activities that DEQ currently conducts at the site and optional activities that DEQ can consider implementing. This list is intended to be flexible and activities may be added or deleted as the project progresses and as feedback is obtained from the public. Activities that do not receive a favorable response from the public may be dropped in order to focus on more popular activities.

2.1 Existing Outreach Activities to Continue

DEQ has an ongoing outreach program at the site. Activities that DEQ currently performs and intends to continue are:

1. Continue to provide a point of contact
2. Continue to develop and distribute fact sheets
3. Continue to hold public meetings/open houses
4. Continue to provide updates to local government officials and agency partners
5. Update and expand the web site
6. Maintain the information repository and administrative record
7. Maintain the site mailing list
8. Continue to develop the email list service
9. Continue to present on local radio programs
10. Continue to provide design review team meetings on a regular basis
11. Continue to distribute news releases about reaching project milestones
12. Continue to hold public tours, sampling demonstrations, etc.

These activities are described in more detail below and supporting information is provided in the cited appendices.

Clark Fork River OU Principal Site Contacts

DEQ

Brian Bartkowiak

DEQ Project Officer
(406) 841-5043, (406) 461-3070 cell
bbartkowiak@mt.gov

Jeni Garcin

DEQ Public Information Coordinator
(406) 841-5016, (406) 437-1627 cell
jgarcin2@mt.gov

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Helena, MT 59626*

2.1.1 Continue to Provide a Point of Contact

The DEQ operations manager, Brian Bartkowiak, and public information officer, Jeni Garcin, will continue to serve as the public's points of contact for the site. DEQ will also continue its commitment to providing answers in a timely fashion.

In addition to answering questions, DEQ will make a point of *asking* people if they have questions. This can be done during sampling events, at meetings, and in all interactions with the public. People often have questions but are hesitant to speak up. As a result, they may assume the worst. It is much better to proactively ask questions and to address them with the appropriate information. During the course of these interviews, people commented that they appreciated that DEQ was taking an interest in what the community thought. Asking questions is an excellent way to find out what types of information the community wants and how they would like to receive it.

2.1.2 Continue to Develop and Distribute Fact Sheets

DEQ currently prepares an informative annual fact sheet called *River Review* that is posted on its website and distributed via email. The latest issue is from October 2011, and the two previous issues were December 2010 and June 2009. DEQ intends *River Review* to be a regular update to inform and engage the public about developments, plans and activities for the site remediation and restoration. *River Review* is a collaborative public information piece from DEQ, the Natural Resource Damage Program (NRDP), EPA and CFRTAC. Copies of the River Review fact sheets that have been prepared to date are provided in Appendix C.

2.1.3 Continue to Hold Public Meetings/Open Houses

Many people interviewed said they liked meetings, both open-house meetings and more traditional meetings where presentations are given and questions are answered. People who preferred the traditional meetings may find it useful to have other people ask the questions so they could just listen. DEQ will set a goal of having at least an annual public meeting and open house. The combined format is good for both people who prefer to have a presentation and feel comfortable asking questions in front of an audience, and those who like to mingle and ask questions one on one. DEQ will have a presentation at the start of the meeting followed by time to circulate among the various tables. This can give people something to talk about when they visit the tables. Asking people who visit each table what their concerns are and writing them on a flip chart is a good way to stimulate conversation and to capture concerns.

To increase attendance, DEQ will place an ad in the local papers, send out an email reminder, and will consider also sending out a postcard reminder. DEQ will issue a press release in advance of meetings, and may even give a brief interview to the local paper about the subject of the meeting (an annual update of the site's activities). By issuing press releases, DEQ may see an increase in the number of positive stories about the site. Local media include two local newspapers (the Anaconda Leader and Silver Star Post), two radio stations (River Ranch Radio KQRV and KBCK in Deer Lodge, and KGLM-FM in Anaconda). A list of media contacts for distribution of press releases or placement of advertisements is provided in Appendix D.

For the first meeting following the completion of the CIP, the meeting should also include a review of the highlights of the CIP: *"Here's what we heard you saying and here's what we did to address it."* This will let people know that their input was valued and acted upon.

Public meetings and open houses will be held at locations that are easily accessible to the site and that meet accessibility requirements of the Americans with Disabilities Act. A potential list of meeting locations is provided in Appendix D.

2.1.4 Continue to Provide Updates to Local Government Officials and Agency Partners

DEQ currently meets with Powell County commissioners, the county planning director, and the Deer Lodge mayor to keep them up to date with project progress. In 2012, DEQ will continue those meetings and will expand to provide at least one briefing to local officials in Anaconda/Deer Lodge County government. Remediation work has not begun in that county yet, but an update would be a good way to build relationships for the future. The list of elected officials relevant to both counties is provided in Appendix D.

DEQ also meets on a regular basis with its agency partners at EPA, NPS, and NRDP. These meetings will continue to ensure that everyone is up to date with plans and progress at the site. Contacts for those agency partners are also provided in Appendix D.

“I think I would like to see all the direct agency people and Rogers and Brians of the world. I would like to see more involvement from the administrators and see more presence here. Brian is here every day and Roger has been filling in his knowledge of the site. They respond well, I would like to see their administrators be in more contact with the commissioners and have more presence. “

“Have administrators come down and sit with the city commissioners and council and have that type of interaction.”

2.1.5 Update and Promote Clark Fork River OU Web Site

DEQ has a CFROU website as part of the overall State of Montana website. It includes an overview of site history, developments, upcoming activities, and links to supporting documents. It serves as a useful tool for providing information to the public, but much of the introductory information has not been updated since 2009 (although newer documents are posted). Also, the general public does not know it exists.

The DEQ website will be updated and DEQ will ensure that it stays current. Also, to make more people aware of it, the link for the website will be included in all email announcements and in publications (e.g., the semi-annual facts sheet), letters, press releases, and advertisements. DEQ will also endeavor to link the website to other established websites. Those websites will include (but may not be limited to):

- **Clark Fork River Technical Assistance Committee (CFRTAC).** “CFRTAC is a volunteer citizens' organization whose mission is to help residents make informed choices and participate in the Superfund remediation, restoration and redevelopment of the Clark Fork River and its affected communities from Butte to Missoula. As the EPA-designated technical advisory group, CFRTAC has been involved in the Clark Fork River watershed for more than 15 years.”
www.cfrtac.org

- **Clark Fork Coalition (CFC).** The CFC is “dedicated to protecting and restoring the Clark Fork River basin, a 22,000-square-mile area draining western Montana and northern Idaho. We have a 25-year-long record of substantial achievements improving the health of the watershed.” www.clarkfork.org.
- **Montana Natural Resources Damage Program (NRDP).** The NRDP was created in 1990 to prepare the state’s lawsuit against the Atlantic Richfield Co. for injuries to the natural resources in the Upper Clark Fork River Basin. Decades of mining and mineral processing operations in and around Butte and Anaconda released substantial quantities of hazardous substances into the Upper Clark Fork River Basin between Butte and Milltown. These hazardous substances extensively degraded the area’s natural resources.” <https://doj.mt.gov/lands/>
- **Clark Fork Watershed Education Foundation (CFWEP).** “CFWEP has been a leading provider of environmental and restoration education programs and services in western Montana since 2005. Based at the Montana Tech Department of Technical Outreach in Butte, the CFWEP offers multi-disciplinary science and history programs for schools, teachers, and students in and around the Upper Clark Fork Basin. The CFWEP also offers public education and outreach services such as tours, events, and publications that connect the public with the science and history of the amazing landscape of western Montana.” www.cfwep.org.

DEQ will also coordinate with EPA to ensure that EPA’s website for the CFROU is updated. That website is: <http://www.epa.gov/region8/superfund/mt/milltowncfr/cfr/>. As part of this process, DEQ will visit these sites at least annually to check that the links to DEQ’s website are live.

2.1.6 Maintain Information Repository and Administrative Record

DEQ will continue to maintain the on-site information repository and the administrative record. DEQ’s administrative record is housed at DEQ headquarters in Helena, Montana (Appendix D), and EPA’s administrative record is housed at the EPA Records Center in Helena, Montana. The site information repository is a subset of documents from the administrative record. It is located at the DEQ office in Helena, in order to be accessible to the general public.

The repository contains basic site information for public review, documents on site activities, technical site documents, this CIP, and general information about the Superfund program. DEQ has placed notices in the local newspapers that notify the public of the availability of the administrative record file and identifies the information repository location and the hours of availability. That information has also been provided in fact sheets other site documents.

Because so many people prefer to get information via the internet, rather than drive to a document repository, most of the documents included in the information repository are also listed on websites maintained by either EPA or DEQ. In general, documents previous to and including the record of decision (ROD) can be found on EPA’s website www.epa.gov/region8/superfund/mt/milltowncfr/cfr/. Most documents prepared since the ROD was issued in 2004 can also be found on DEQ’s website (www.deq.mt.gov).

2.1.7 Maintain a Site Mailing List

DEQ will continue to maintain the existing site mailing list. This mailing list will be used to distribute materials such as fact sheets or reminder postcards.

2.1.8 Continue to Develop the Email List Service

Email is fast and inexpensive and can be an excellent way to communicate with people about the site. Feedback from the interviews indicated that the majority of people interviewed now rely on email as a reliable communication tool. DEQ currently has an email list service that can be accessed through the site's website and is now linked to its *River Review* e-publication. However, the email list service is underused and could be greatly expanded if more people were aware of its existence.

DEQ will work to expand that email list over the coming year, with the goal of making it the primary means to providing written materials (e.g., fact sheets) meeting reminders, and other notices to the public. It will be used in conjunction with the site mailing list to provide fact sheets, meeting reminders, and other project information to the general public.

“They need a listserv or something from DEQ. A listserv wouldn't cost any money, really --- no layout or printing or mailing; it's a pretty informal way to communicate. It would be great if at least once a month, there was an update. Even if the message was, “Nothing new to report this month,” it would be helpful to know. Or maybe a message would be sent via the listserv, “We're meeting with EPA over XXXX this month.” Over time, this list would create a number of subscribers, and people would begin to find news that way. That would be really nice.”

2.1.9 Continue to Present Information on Local Radio Programs

In the past, the DEQ project officer, Brian Bartkowiak, has made appearances on the local radio programs – River Radio with Bob Toole - to provide information on site activities. This has been well received, and DEQ intends to continue the practice, with a target of one appearance per year. Contacts for the radio station are provided in Appendix D.

2.1.10 Continue to provide design review team meetings on a regular basis

As the design and construction progresses, every attempt will be made to hold design review team (DRT) meetings at least twice a year, or more often as needed. The DRT is comprised of members of the public, local governments and members of the environmental remediation and restoration community with technical expertise. The meetings are an important step in the design process and will be open to the public, although most of the discussion will be limited to DRT members or their alternates. Time will be given at the end of the meeting for public input and questions. The DRT will review the designs for technical adequacy, coordinate the designs among agencies, and inform the public and interested parties about design details.

2.1.11 Continue to distribute news releases about reaching project milestones

DEQ will continue to distribute news releases about reaching project milestones, particularly as design and construction progress. In the past, DEQ issued news releases at settlement, at the start of construction, at the beginning of residential yard removal, during sampling events, and for other newsworthy activities and events.

2.1.12 Continue to hold public tours, sampling demonstrations, etc.

DEQ currently conducts the occasional public tour, sampling demonstrations, etc. at the site. For instance, DEQ conducted a sampling tour to demonstrate sampling approaches and also provided several tours of the Trestle area cleanup and is open to providing tour to interested groups upon

request. These events have been well attended and have received favorable feedback from interviewees, so DEQ plans to continue to offer them where possible.

2.2 Optional Outreach Activities to Consider

In addition to the substantial list of activities listed above, optional activities that DEQ will consider implementing if time and manpower are available include:

1. Have a presence at local events
2. Give presentations to local groups
3. Involve the schools
4. Set up and operate a local information and project office
5. Hold news events or other events to celebrate successes
6. Send monthly updates to email list serve with recent developments, updates, and plans
7. Explore the use of social media

2.2.1 Have a Presence at Local Events

DEQ will consider having a presence (e.g., a booth with handouts) at local events, such as fairs or rodeos. These events are a great place to hand out brochures, shake hands, and talk about the site with people who would not normally attend a public meeting. Attending these events presents an opportunity for the DEQ to develop relationships and become a recognizable, friendly face to more people in the community. This makes it more likely that people will come to DEQ with questions or concerns in the future. Most of the materials that would be needed for this event would be those that have already been prepared for meetings or sampling visits. An annual appearance at one event is a manageable goal.

Some suggested events for consideration in 2012 or beyond are:

- **Tri County Fair and Rodeo.** Deer Lodge Fairgrounds. August 15th to 19th, 2012.
- **Health Fair.** 30 vendors, free info, food and health screenings. Noon to 8 pm at the Deer Lodge Medical Center, 1100 Hollenbeck Rd. February 21st, 2012 (should try for 2013).
- **Territorial Days.** Deer Lodge old prison yard and Main Street. June 16th, 2012, 8 am to 11 pm
- **Art in the Park.** Washoe Park. July 20th to 22nd, 2012.
- **Oktoberfest.** 401 E Commercial, Anaconda. September 29th, 2012.

“You go to people and introduce yourself. You get farther with one-on-one conversations. You're going to engage people. Talk to those most impacted. They'll talk to twenty people and then those twenty will talk with another twenty people. Then when you have the community meeting, people will actually come. They have a human connection with you and then you'll get a lot more input.”

2.2.2 Give Presentations to Local Groups

Giving presentations was mentioned by several interviewees. DEQ will explore giving presentations to community groups in the area (e.g., Rotary, Elks, garden clubs, or homeowner groups). These presentations are a good way of identifying middle-ground people who may not already be involved in the process. These folks can help explain the facts to their neighbors. The materials that would be needed for these events would be those that have already been prepared for meetings or other visits. In addition, speaking to a friendly group can be a welcome break for the project team. Setting a goal of doing one or two such talks a year is achievable. A list of local groups that would potentially welcome presentations is provided in Appendix D.

“At the same time as you are talking to these groups, you must make SURE things are happening on the GROUND. As soon as you get those comments from the public, you must be working in the field and visibly implementing what you can. The worst thing that could possibly happen at this point, is that if the public comes back out, really does get involved again, and then nothing happens. If EPA, DEQ, NRD or the Governor’s office slows it down because some i is not dotted or some t is not crossed, you will destroy the public trust. The public’s interest is already low, so a false start would make it disappear. “

2.2.3 Involve the Schools

Because this site will be active for a long time, DEQ will consider involving younger people in the process. Raising the awareness of the site with kids educates both the children and their families. Local citizens have a strong, generational connection to their property. Raising awareness in kids should improve communication and be beneficial to the kids. DEQ will explore making an annual presentation at a school or group (e.g., 4-H or Future Farmers of America). DEQ could also take a science class on a field trip to collect a water sample. The kids could take turns wearing gloves and writing down the notes, and they could look at a printout of lab results. DEQ could have a contest to design an informational poster about the site. This type of annual event could build goodwill and would also be an enjoyable experience for the project team. It could also ignite a child’s interest in science and government. Names and locations of local schools and contacts for those schools are provided in Appendix D.

“Educational component is important. I think the education just isn’t out there for the kids to understand what a site this is and where they live. “

“I think the kids are missing out on the educational funding to be more involved, put them on the river, measure and take samples. Have them be aware of what the slickins are? And when they come across a green mouse bone, they will know why it is there.”

2.2.4 Set Up and Operate a Local Information and Project Office

DEQ is considering the possibility of staffing an office closer to the site location with office hours and specified open house times for easy access to members of the public. During the interviews, several members of the community and local government stressed the importance of having a local presence in the community.

2.2.5 Hold news events or other events to celebrate successes

To increase public awareness of the work that has been completed at the site, DEQ is considering adding news events or other events (e.g., historic marker dedications) to the outreach schedule. An example would be an event to showcase the Trestle cleanup in tandem with a Deer Lodge weekend celebration.

2.2.6 Send monthly updates to email list serve with recent developments, updates, and plans

DEQ has developed a list serv, attached to our webpage, of interested individuals and sends updates with project developments. To better engage these individuals, DEQ is considering sending monthly updates with descriptions of recent developments, updates, and plans. The updates would be brief and would provide a contact or source for additional information.

2.2.7 Explore the Use of Social Media

Social media tools (e.g., Twitter, Facebook, YouTube, internet forums, podcasts, blogs, etc.) are quickly becoming the preferred method of communication in many geographic and demographic groups. Their use is not yet as prevalent in rural Montana, due to the age of the population and preference for traditional communication methods. However, they should not be discounted and DEQ will consider use of one or more of these social media in expanding outreach to younger audiences at the site. The greatest potential for success with these media will likely be communication efforts made in conjunction with the local schools.

Section 3 - Site Timeline and Proposed Schedule

Heavy metals originating from historic mining activities, milling and smelting processes associated with the Anaconda Company operations in Butte and Anaconda have accumulated on the Clark Fork River stream banks and floodplain over a period of at least 100 years. The primary sources of contamination are tailings and contaminated sediments mixed with soils in the stream banks and floodplains, which erode during high flow events and enter the river and other surface waters. In addition to erosion, heavy metals are leached from the contaminated sediments and tailings directly into the groundwater and eventually to surface water. These contaminant transport pathways result in impacts to terrestrial and aquatic life along the Clark Fork River as described in the ROD for the site.

The CFROU was added to the NPL list in 1992. In 1995, Atlantic Richfield Company (ARCO) began remedial investigation on the Clark Fork River Superfund Site. Shortly after the remedial investigation began, ARCO began the feasibility study, completing these in 1998 and 2002, respectively. Two years later, a proposed plan was released by the EPA to the public. In 2004, the Record of Decision was agreed upon and signed. The ROD was followed by the signing of the Consent Decree in 2008. Remedial Design began shortly after and in 2010 and 2011 residential yard cleanup took place. The Trestle area located in the city limits of Deer Lodge underwent construction in 2011 and was completed in 2012. Pasture cleanup began in 2012. Remedial Designs along the river began in 2009 and implementation on Reach A, Phase 1 will begin at the end of 2012. Cleanup is expected to take 10 to 12 years.

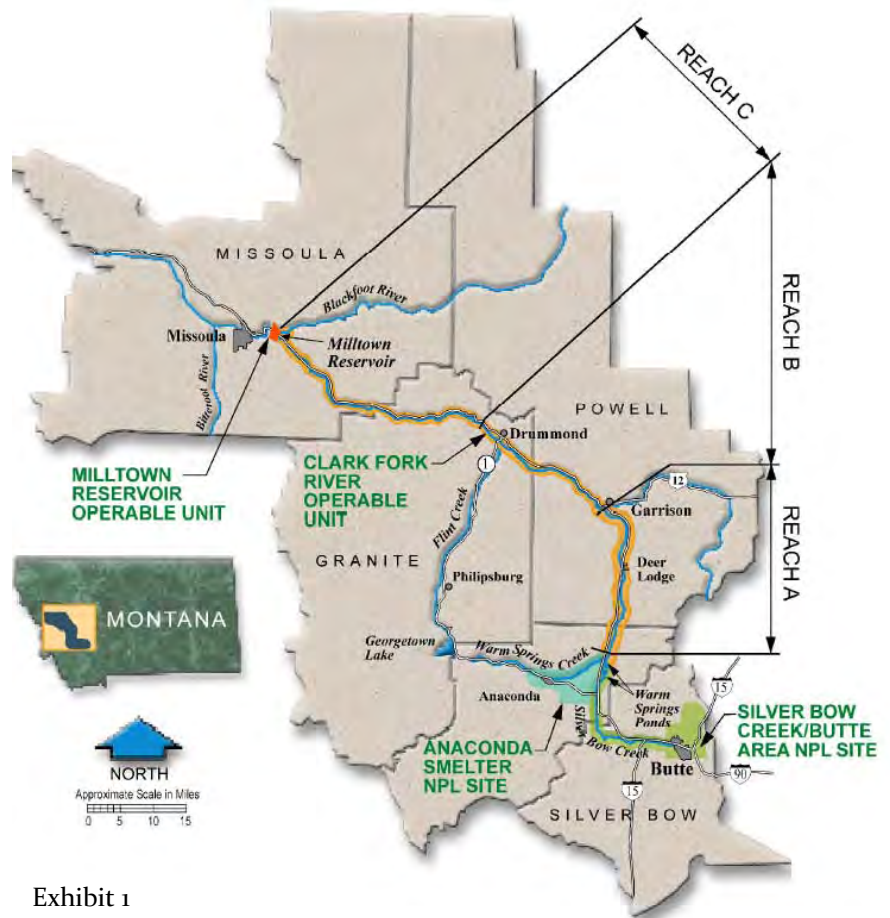


Exhibit 1
Map of Site Showing Clark Fork River OU

Exhibit 2 depicts the general Superfund process as it applies to the Clark Fork River OU. The following *briefly* lists significant regulatory actions taken to date and activities scheduled for the future.

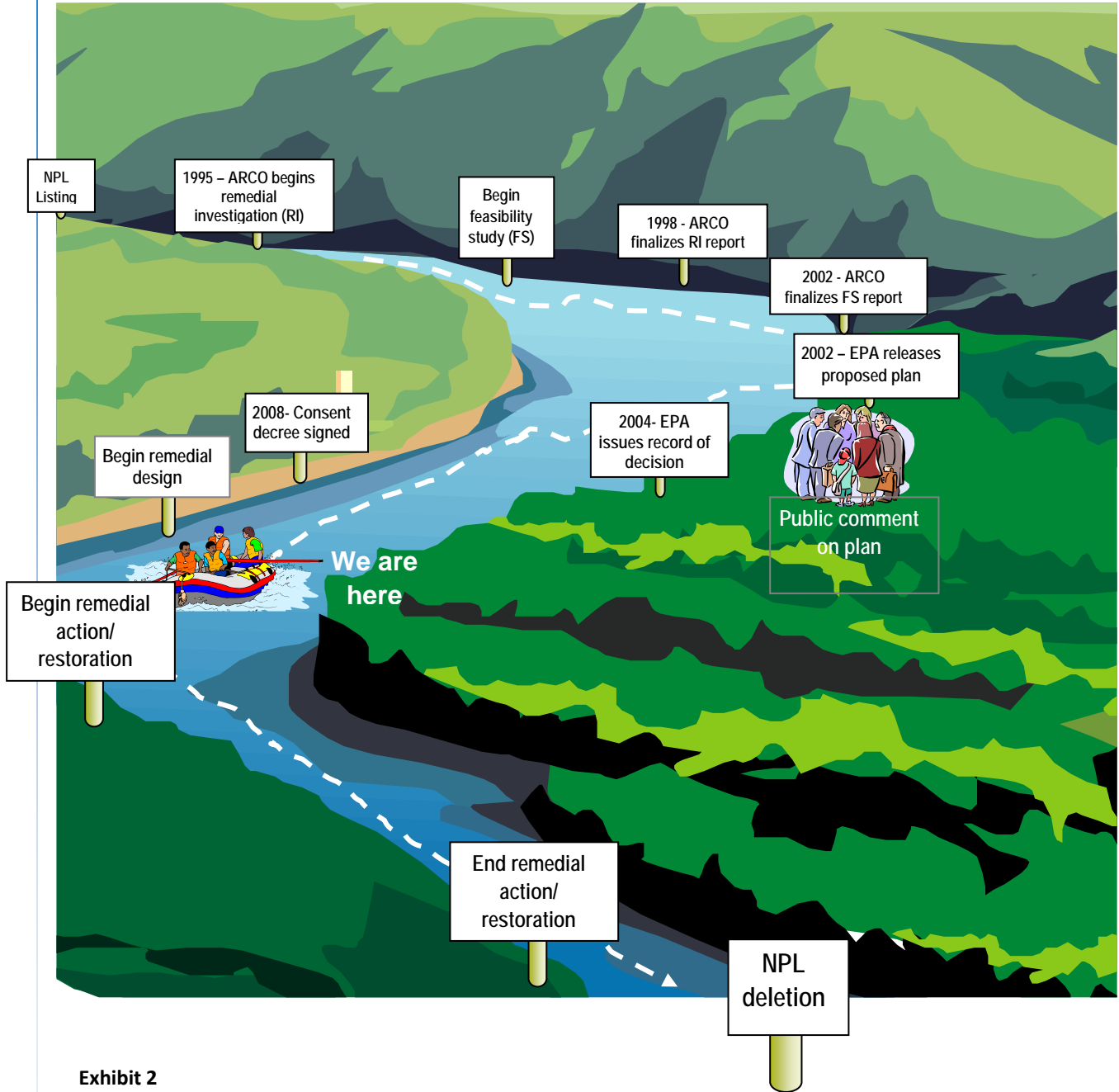


Exhibit 2
Overview of Superfund Process at the Clark Fork River OU

3.1 Inception to Date

The site was added to the National Priorities List (NPL¹) in 1983, and the Atlantic Richfield Company (ARCO) was named as the potentially responsible party (PRP). Since 1990, significant remedial actions, investigation, and evaluation have been conducted. Highlights of those are listed below:

- **1990.** Governor’s Demonstration Project demonstrated lime amendment and revegetation.
- **1992.** EPA designates the Clark Fork River OU as one of three OUs at the Milltown Reservoir/ Clark Fork River Superfund Site.
- **1995.** ARCO begins the remedial investigation (RI) and time critical removal action.
- **1998.** EPA prepares the Human Health Risk Assessment (HHRA).
- **1998.** ARCO issues the RI report.
- **2001.** EPA prepares HHRA addendum and ecological risk assessment.
- **2002.** ARCO issues feasibility study (FS) report and EPA releases proposed plan for cleanup.
- **2004.** EPA issues the ROD.
- **2007.** The State of Montana issued a revision of the 1995 remedial investigation plan because the ROD and other documents more definitively set forth the expected nature of cleanup and agency collaboration.
- **2008.** A consent decree (CD) was signed that provides the structure for how ARCO "cashed out" its cleanup responsibilities by providing over \$123 million to the State of Montana, which will perform the remedy and restoration activities with EPA and NPS oversight. The CD and Montana (2008)/EPA Memorandum of Agreement (2007) provide the details of how the project will be performed.
- **2009.** Remedial design began for residential yard cleanup and Trestle Area cleanup in Powell county.
- **2010.** Work on residential properties began to remove and remediate clean up in yards on private properties.
- **2011.** Cleanup on the Trestle Area in city limits of Deer Lodge began and was completed in the Spring of 2012.

3.2 2012 and Beyond

Now that enforcement proceedings are completed, remedial design has begun, followed by remedial action construction to implement the selected remedy. DEQ has taken on the role of the lead agency and will implement the remedial design and remedial action, with EPA and NPS oversight. The future work is divided into “remediation” and “restoration” components, both of which are described below.

¹ Acronyms and abbreviations are provided on page iii.

3.2.1 Remediation

The primary sources of contamination in Reach A are tailings and tailings mixed with soil in streambanks and the historic floodplain exacerbated by depth of tailings. These sources directly impact plant and animal life through uptake and ingestion, and also impact humans who come in contact with the soils. Contaminants move from tailings and impacted soils, through the process of erosion, directly into the river and other surface waters increasing impacts on aquatic life. In addition to erosion of tailings and impacted soils, metals are leached directly from the tailings into groundwater and surface water.

The lack of floodplain vegetation is caused primarily by acid generation and resulting metals contamination. This fundamental problem at the Clark Fork River OU leads to a host of other impacts. To eliminate or reduce these impacts, the Remedy relies on a combination of remedial technologies, including the following:

1. Stabilizing eroding streambanks and the adjacent floodplain
2. Removal of exposed tailings or slickens and contaminated soils to a central disposal area and replacement with clean soils
3. In-situ treatment of areas of impacted soils and vegetation
4. Revegetation of the riparian corridor and other treatment or removal areas

A flexible, 50-foot riparian buffer zone will be established on both sides of the river. The floodplain contamination will also be addressed. Opportunity Ponds will be used for disposal of all removed contamination.

Weed control will be a major part of all cleanup plans and best management practices (BMPs) will be used to protect the cleanup. These elements will be part of landowner specific plans and will ensure that land use practices are compatible with long-term protection of the cleanup.

Institutional controls (ICs) will be used to protect human health and the environment and the integrity of the remedy. These may include: county zoning regulations, deed restrictions, permanent funding for Arrow Stone Park, and groundwater sampling and use controls. Environmental monitoring is required during all activities.

Because the NPS has specific cleanup needs and responsibilities under the laws that govern National Historic Sites, such as the Grant-Kohrs Ranch, the selected remedy is modified and expanded for this area. The State of Montana intends to perform a combined remedy / restoration cleanup incorporating aspects of the State's restoration plan, with landowner concurrence.

At present, DEQ anticipates that the timeline moving forward will be:

- Advertise and award a Contract for Reach A, Phase 1, Fall 2012. Reach A, Phase 1 is the upper most construction reach of Reach A.
- Advertise and award a Contract for Eastside Road Pasture Remedial Action, Fall 2012.
- DEQ will develop design for other phases in coordination with landowners and implement construction on those reaches.

- DEQ anticipates working on multiple non-consecutive reaches at once in order to implement the cleanup on Reach A in a timely manner.

Appendix A – Community Profile

Powell and Deer Lodge counties are the primary counties affected by remediation and restoration of the CFROU. Located in Southwest Montana, these two counties have a relatively small population and tax base. The City of Deer Lodge is the county seat of Powell County. Anaconda is the county seat of Deer Lodge County. The majority of miles to be remediated in Reach A are located in Powell County. Powell County has diverse industries, including farming, ranching, mining, timber harvest, lumber and other wood product production and tourism.

A.1 Community History

Deer Lodge is the second oldest town in Montana. It has had several names over the years, such as LaBarge City, Spanish Fork, Cottonwood, Deer Lodge City, and now Deer Lodge. Float gold was discovered in 1852 on what is now Gold Creek. The location of this first discovery of gold in Montana is about twenty miles north of the city. Pan and sluice mining of gold by James and Granville Stuart in 1860 attracted other prospectors and the district was established. The discovery of gold in the 1860's prompted a period of discovery and development for area hot springs. Gold miners would soak in the hot water, and local physicians prescribed daily soaks as cure for disease.

While much of Gold West Country is rich in mining history, the area around Deer Lodge was settled by ranchers. They found the valleys in the area prime for raising cattle which could be marketed to mining towns throughout the region and settlers traveling the Oregon Trail. Today, Deer Lodge boasts an unusual mix of historic attractions including six museums, one which features the Old Montana Prison. The town is also home to the Grant-Kohrs Ranch, the only National Historic Site that is also a working cattle ranch. It's operated by the NPS.

Anaconda was founded by Marcus Daly in 1883. He became one of the world's wealthiest men by supplying copper for electrical and telephone wiring in the late 19th century. Today, Anaconda is part of the nation's largest National Historic Landmark District. The Anaconda Company had a stranglehold on the state's copper industry for about 100 years, but today Montana is known as a tourist destination for those drawn to its many trout streams and wide open spaces.

A.2 Population and Demographics

Information on population and demographics was obtained from the 2010 census via Montana's Census and Economic Information Center (CEIC at www.ceic.mt.gov). A summary is provided below:

Deer Lodge County

In 2010, Deer Lodge County had a reported population of 9,298, which was a 1.3 percent drop from the population reported in 2000. It ranks 22nd of 56 Montana counties in terms of population. Over 93 percent of the population is white, 3 percent is Native American, 3 percent is Hispanic, and less than 1 percent is African American. English is the primary language spoken. The county reports a total of 5,122 housing units, 4,108 of which are occupied.

Most people in Deer Lodge County reside in Anaconda. Other cities and towns in the county are: Galen, Georgetown, Opportunity, and Warm Springs.

Powell County

Powell County's 2010 population was 7,027, which was a 2.1 percent drop from the population reported in 2000. It ranks 29th in terms of population within the state. Approximately 93 percent of the population is white, 4.6 percent is Native American, 1.7 percent is Hispanic, and 1 percent is African American. English is the primary language spoken. The county reports a total of 3,105 housing units, 2,466 of which are occupied.

Most residents of Powell County live in the City of Deer Lodge. Other towns in Powell County are: Avon, Elliston, Gold Creek, Garrison, and Ovando.

A.3 Employment and Income

Deer Lodge County

The Anaconda local development corporation's website provides employment and income data for the county. The major employers are listed as: Fairmont Estates, First National Bank, Jordan Contracting, CCCS, New Directions Youth Services, Safeway, Town Pump, Albertson's, Warms Springs State Hospital, Aware, INC. (Group Homes), Anaconda Job Corps, Community Hospital & Nursing Home, Dee Motor Company, and AFFCO. The website quickfacts.census.gov reports that the per capita income in Deer Lodge County was \$21,921 in 2010, and the median household income was \$35,310.

Powell County

The Powell County Chamber of Commerce (www.powellcountymontana.com) reports that the major employers in the county are a mix of private and government entities: Montana Correction Enterprises, Montana State Prison, Montana Registrar of Motor Vehicles, Sun Mountain Lumber (lumber mill), and Sun Mountain Logging. In 2010, the per capita income was \$17,849 and the median household income was \$39,851, which is about 10 percent below the state average. Powell County has a labor force of 2,704 and an unemployment rate of 9.3 percent.

The website www.City-data.com reports that the most common occupations for males in Powell County's population center (Deer Lodge) are:

- Law enforcement workers including supervisors (13%)
- Material moving workers except laborers and material movers, hand (5%)
- Woodworkers (5%)
- Fishing and hunting, and forest and logging workers (5%)
- Laborers and material movers, hand (4%)
- Electrical equipment mechanics and other installation, maintenance, and repair occupations including supervisors (4%)
- Building and grounds cleaning and maintenance occupations (4%)

For females, the most common occupations are:

- Secretaries and administrative assistants (9%)

- Information and record clerks except customer service representatives (7%)
- Counselors, social workers, and other community and social service specialists (7%)
- Other management occupations except farmers and farm managers (6%)
- Preschool, kindergarten, elementary and middle school teachers (6%)
- Child care workers (5%)
- Nursing, psychiatric, and home health aides (4%)

The average household size in Deer Lodge is 2.4 people, and the percentage of residents living below the poverty line in 2010 was reported to be 17.3 percent.

A.4 Local Services

Deer Lodge County

Deer Lodge county has a combined local government with the Town of Anaconda – referred to as Anaconda-Deer Lodge County. There is a Chief Executive and five commissioners. Municipal services are headquartered at 800 South Main, in Anaconda. They are detailed on the county’s website at www.anacondadeerlodge.mt.gov. Services are typical of most incorporated communities of this size and include (but are not limited to): fire, police, courts, treasurer, public health, human resources, schools, clerk and recorder, environmental health, and planning.

Powell County

County municipal services are headquartered in the Powell County Courthouse at 409 Missoula Avenue in Deer Lodge and are detailed on the county’s website at www.powellcountymt.gov. Services are typical of most incorporated communities of this size and include (but are not limited to): fire, police, courts, treasurer, public health, human resources, schools, clerk and recorder, environmental health, and planning. The county government consists of three elected commissioners. The City of Deer Lodge has a mayor and a city council. City offices are located at 300 Main Street in Deer Lodge.

According to the Powell County Chamber of Commerce (www.powellcountymontana.com), Deer Lodge has a full range of local services, including: 9 restaurants, 5 motels, 2 theaters, 2 art galleries, 3 bookshops, 2 RV parks, 1 airport, 14 churches, 2 bars and casinos, 1 funeral home, a medical center, and 3 banks. Gas and electric utilities are provided through NorthWestern Energy. There are two media outlets: the Silver Star newspaper and the KQRV/KBCK AM/FM radio (Appendix X). High speed internet is provided through Bresnan and Qwest. The local public library is the William K. Kohrs Memorial Library located at 501 Missouri Avenue.

A.5 Education

Deer Lodge County

- Anaconda High School (9-12), 5th and Main -563-5269
- Fred Moodry Middle School (7-8), 3rd and Cherry – 563-6242
- Lincoln School (K-6), 506 Chestnut, 563-6141

- W.K. Dwyer Intermediate (4-6), 1501 W. Park Ave. – 563-5562
- W.K. Dwyer Primary (K-3), 1601 Tammany Ave. – 563-7365

Powell County

The school district headquarters for Powell County is located in Deer Lodge (444 Montana Ave. - 846-1553). The county has one high school, one junior high, and two elementary schools in Deer Lodge and six rural schools (K through 6 or 8):

- Powell County High School (9-12), 709 Missouri Ave. - 846-2757
- Duvall Junior High School (7-8), 444 Montana Ave. - 846-1685
- Granville Stuart Elementary (K-6), 444 Montana Ave. - 846-1622
- O.D. Speer Elementary (K-6), 444 Montana Ave. - 846-2268
- Avon School (K-8), Avon, Montana 59713 - 492-6191 - K through 8th
- Elliston School (K-8), Elliston, Montana 59728 - 494-7676 - K through 8th
- Garrison School (K-6), Garrison, Montana 59731 - 846-1043 - K through 6th
- Gold Creek School (K-6), Gold Creek, Montana - 288-3560

A.6 Community Organizations

CFRTAC and the CFC are the two main community organizations with significant interests in the CFROU. Information about these organizations, including their websites is provided in Section 2. In addition to these organizations that are focused on environmental issues related to the Clark Fork River, there are numerous charitable and social organizations within Anaconda and Deer Lodge that could serve as important resources for engaging the general public on issues related to the CFROU. Those organizations are listed in Appendix D.

Appendix B – Individual Comments from Interviews

B.1. Have you actively investigated and learned about the Clark Fork River Superfund Site?

People who replied only “Yes” (11), “No” (1), or “somewhat” (3).

Other comments:

- Through Superfund meetings and reading the newspapers and the newsletter that comes out and working with Kuipers and Associates and that is about the extent of my knowledge.
- Yes, but I am not an expert. There is so much material that it’s just overwhelming!
- Passively, don’t want to say no. I live out on Race Track Creek, 10 miles south of town.
- Most of my profession has been with the Clark Fork River and quality.
- Not extensively. I have been to some meetings. I have also spoken with some of the surveyors, that are doing work near my property. But I certainly haven’t read everything that is out there.
- Yes, I have worked directly with the Vegetation Management. I am the Noxious Weed Coordinator, with the County. We have direct funding from EPA. This is my 3rd season treating noxious weeds on the Clark Fork for mitigation.
- Well, I was on a committee when this thing all started and then the committee was dissolved. Use to have some good meetings. I know a lot and a little at the same time.
- A little bit from the NRD site a couple of years ago, I was active in the meetings and road map planning and that stuff, so it certainly touched on Silver Bow and Clark Fork.
- I was a county assessor. Was thinking it wouldn’t happen in my lifetime.
- Yes and no. When I was teaching, I was very involved. Now, I do a lot of bird work so I’ve been up and down the river.
- We’ve gone to meetings since moving here since 1996, attended more meetings than haven’t. 153 feet of my property borders the Clark Fork River. There is more to learn. I try to keep up on it. My wife and I have been very active in pursuing what is going on. It has taken forever to get going. There has been some damage over the years.
- Somewhat on Clark Fork River, but I am more familiar with Anaconda.

B.2. What do you know about the site?

General or “Big Picture” Knowledge

- It’s big.
- Just that cleanup is going on around here.

- It's big, there's re-vegetation going on, I have friends that live right on the river where the stream bank restoration is going on.
- It's nation's largest site and very difficult because of the large watershed, which is a big problem, but seems to be addressed pretty well.
- I can remember when Silver Bow Creek was running red and was going into the Clark Fork River. The Milwaukee Railroad was also spilling oil into the creek. I complained about it back then, but my complaints fell on deaf ears.
- I know the historical side. I know how it arrived and what happened over the years. I grew up in Bozeman, so I was always familiar with the area. Since I've been in Deer Lodge, I've been following it, reviewing it, looking at alternatives, and watching the remediation. I've seen the work that they are doing.
- There was a flood in 1906 with significant mining waste that was transported downstream. Also Silver Bow Creek was used for mining discharge. Even with routine stream flows, lots of material found its way out of Butte and Opportunity Ponds and into the Clark Fork River. Of this waste material, most was captured at Milltown Dam, but even that now is coming into question.
- I had to familiarize myself with all the history. Plus I live here and work and recreate on the river. I care a lot about it.
- I know general background, that came from upstream, gentleman that came to rotary. He spoke at rotary about the different areas they are cleaning up and why they were cleaning certain areas, areas that posed more of a threat.
- I know how Superfund came to be. We were the organizers at Love Canal. I was a fish biologist here in Montana, beginning in 1983. We're landowners on the river. As far as anyone can keep track of this huge, almost overwhelming pile of information, we're reasonably well informed.
- In terms of cleanup, from Anaconda down to Deer Lodge it is a mess. Opportunity was a huge dustbowl, but it is getting a little better. Clark Fork River Coalition has done creek restoration and they're creating fishing access sites.
- The Superfund designation started a few years after the Smelter closed and about the time that mining temporarily ceased in Butte. What we have today started out as one little area, and they added and added, until it's the size that it is today.
- Well, I really focus on what is in Powell County. I understand it runs from Silver Bow Creek downstream. My only concern is Powell County.
- Anaconda is the connector of biggest Superfund site in the country. From Butte to Milltown, there have been lots of removal actions. Lots of moving materials around. Materials that were removed in the lower sections and even removals from Butte were all moved here and consolidated. It's a big deal!
- There've been 3 major cleanups in Powell County and a lot of yards have been replaced. They are cleaning up the Roundhouse and Bum Bridge. I know about the Milltown Dam. Most people talk very generally about it. The only person that said anything surprising was a City Council

person that it was news to her that there was pollution. It worries me that someone on the council isn't informed. Most people are in the loop. The last meeting was well attended.

- My main knowledge is about restoring the stream bank. I guess they are going to have a 50-foot perimeter on each side of the bank. They are addressing the hot spots first, more substantial areas of contamination. We call them slickens. This is what I look at on my own land.
- It begins in Silver Bow and ends at Milltown Dam. There was a settlement between ARCO and the state for \$500 million, and that was broken into segments. They were pretty much doing a progressive approach and begin at Butte and headed downstream. Then they took the dam out, and skipped over to Deer Lodge because of some human health risks. Then they will jump back and start at the beginning.
- It's a cleanup project that is far and wide and this is the part I don't know. I spend most of my thoughts about the business here. I never missed a City Council meeting for 17 years. I think a lot of the Superfund projects have helped the community. In September 1980, they closed the smelter and there were over 4,000 people working. It took them 7 years to tear down most of the buildings and the big stack.

Detailed or CFROU-Specific Knowledge

- I know a lot. I've been working hard on this...I've been interested in it since 1985.
- I'm retired. I conducted soil surveys for 19 years in Powell, Deer Lodge and Granite counties. I understand tailings in soils. I am familiar with the demonstration projects and most of the work in Deer Lodge County. I understand the problem.
- Practically everything. I've been going to meetings since 1995, dealing primarily with EPA. I have quite a bit of published material. I know that it's taken longer than they initially thought it was going to because of the lawsuit.
- It was caused by contamination from mining operations in Butte, that formed areas known as slickens on the river that contain mining contamination (like cadmium, lead, zinc, and arsenic). The contamination limits the river from being as productive as it could be, like the Madison or Gallatin. There was a 25-year lawsuit. They sued Atlantic Richfield Company. In 2004, they reached a decision, and 4 years later came the decree that gave the money for the Clark Fork River. We have had Deer Lodge homes cleared up along with side road contamination, generally about 6 inches to a foot. This month, they began the Bum Bridge cleanup, and that should continue until January next year. We hope to see cleanup of the actual river. They call it Phase I.
- I've been involved since 1998 through the NRD Board, the Conservation District, and the Superfund work. I've tried to keep up, but it's difficult. One of the things I've been involved with was a group we formed in 1998, the Watershed Restoration Coalition to help landowners. Some of these people were having trouble communicating with DEQ and EPA. So we were trying to help landowners get more comfortable. We also help the landowners get ranch plans. What if they have to change their operations? So, in that way, we're directly involved in the cleanup process. Some of the landowners are negative. They don't like government agencies coming along and doing stuff on their land. We try to help them understand the benefits to cooperation.

- I grew up in Deer Lodge. I remember when the river flowed green and red and I've watched the clean up. When I was teaching, I took my students out and we measured insects in the river. So I did understand what was happening biologically, as well as a good understanding of the slickens. I started teaching in 1968. There was no life in the river back then. I was told as a child, "Don't go swimming in the Clark Fork River because it's a dangerous place to be." There has been a slow clean up. I remember when we first started finding insects, and then it was very exciting when we started to see brown trout. This correlated with changes in Warm Springs Ponds. We saw a lot more brown trout in the river. We were doing sampling, so I could see changes. The liming they were doing in the ponds had been causing a problem - sediments were cemented together. They used the lime to cause heavy metal precipitates. But then, the spring flooding, etc was actually causing some of those areas to improve. If cementing had continued, people said that it would have been years before there would be any fish reproduction because there weren't any gravel beds. And it was kind of true; there wasn't that much reproduction in the Clark Fork River. Much of the reproduction was taking place in tributaries. But I've been watching the stream bottom. It is IMPROVING. I'm very optimistic.

B.3 Do you have any particular concerns about the site?

Remediation Details

- I'm concerned about how they replant vegetation. I want to see native grass. It looks like weeds to me. I'd like to see more native-looking grasses, and I want more trees – willows and fruit trees. There has to be habitat for birds and wild animals. I want to see the river cleaned up. When they clean up a landowner's land, I wish they would have better access to the river. Talk to these landowners about being a little friendlier toward sportsmen. The stream access law is being violated by a landowner in our area. Some landowners are keeping sportsmen out of the river. I'd like to see issues like this settled. Why can't they work out access? Landowners are getting money to clean up their land.
- We want to execute the remedy as best we can. We have opinions about how this should be done, and we provided comments on the ROD and the CD. Our comments were shot down. The state is under pressure now with the economy, but I don't want to be short-changed. We have one chance to make this right. They're not going to come back and re-fix it, and I don't know what will happen with the remediation on city properties. Because where the water treatment plant currently is, is in the middle of a very active floodplain.
- They drill holes and check for contamination, and I am assuming that they are doing the 18 inches, and are they aggregating their results, because some places are hotter than others and deeper than others. Are they spreading the contamination? Some places it seems like Mother Nature is taking care of, and then they go in mess it up. I don't know the answers, not sure if they explained that fully. The last 10 years I haven't been allowed to get involved, other people were taking care of it, it wasn't my concern.
- From Warm Springs Ponds to Milltown, I don't have any real particular concerns. My main concern is that treating with lime has been shown to be effective. But DEQ wants to remove everything and haul in non-alluvial soil. I do not agree with that method. In places that have had treatment in the past, there's good vegetative growth and weeds are not a problem as long as there was grazing. For example, the Governor's Project was very successful. There are problems with bringing in non-alluvial soil – weeds for one. And, if there's a flood, non-alluvial soil will go

before the alluvial soil. Another concern that I have is with potential accidents between trucks hauling materials and local residents. Increased traffic is the primary problem. It's not that the trucks are not obeying laws in most cases. Although, they don't always stop at stop signs.

- In the 1980s, ARCO was promoting in situ treatment. They were treating soils with 50 tons of lime/acre. That tied up heavy metals and made them immobile and less of a problem. But the Clark Fork River meanders. So, this treated material erodes into the river, and the work is undone. It's also hard to get good mixing of lime, so you still get hotspots where nothing grows. This is a major concern. Removal is pretty straightforward, although it might be challenging to get into wet areas to work. I favor more removal, even though I know there will be some of both. I'm also concerned that it's taken so long. There is nothing being done on the main section of the Clark Fork floodplain.
- Streams and streamside areas are a concern where mine waste is left in place. With the Clark Fork River or a stream, like Silver Bow Creek, the waste is maybe several feet deep. Was the remedial investigation extensive enough to identify everything that was out there? There was a lot more out there than people realized at other sites, and also the material moved around a lot.
- More than anything, I want to find effective remediation. I don't believe that complete removal and replacement is always the way to go. Some of the other methods are more effective. I'm glad they are trying other things. Some of that is real good. For example, between Butte and Anaconda, when I was growing up, there was nothing there. Now there are trees and shrubs. So some of those areas are being remediated, just in the course of natural progression.
- Before the next flood event, the low points along the creek need to be looked at. Some low areas should have had some shoring. The Clark Fork River has no problems and can handle water well, but at Warm Springs Ponds, the folks there said they were going to start dumping a lot of water, so the Clark Fork River would rise. I surveyed low points along the river that would go to residential areas and added more sandbags. The bridge was already condemned and closed, so we took it out and did 24-hour monitoring on Cottonwood Creek and the Clark Fork. Good thing Warm Springs Ponds gave us a heads up. I'm impressed that creek handled so much. I expected much more damage. We didn't lose many homes. If they put a little more effort into this, it will be much better next time.
- I feel Anaconda/Deer Lodge County has been the waste repository for the Clark Fork and Butte. Materials are placed here, and we've not been compensated properly. There were problems with Milltown sediments in Opportunity Ponds. This is a basin problem, not just an Anaconda problem. Missoula won and we lost. Now they are stripping top soil from the area near my home to cover up the tailings because nothing was growing. The scientists said this would happen, and yet EPA moved it here anyway. Why didn't they truck in topsoil? They trucked in all the contaminants, so why not truck in topsoil instead of taking ours? The place that is most impacted by the moving in of contaminants has to solve the topsoil problem, too. It is unfair. I think Anaconda should be compensated for every outside load from Butte to Missoula. This community is greatly impacted.
- I have a number of concerns regarding cleanup, starting with the glacial pace. I have reservations about concept on which the cleanup plan has been based. When the river moves, the contamination will move right along with it. There are a vast number of issues which have not been answered to our satisfaction. It's not scientific, and they are not providing a cleanup

that provides revitalization of the river ecosystem. As landowners, how will cleanup take place on our property? We have had multiple discussions having to do with the assumptions that surround the plan as we understand it for cleanup. I am skeptical that they can stabilize the river in its current channel, remove contamination, and revegetate the area in anything like the timeframe they are suggesting. Re-establishment of good, woody vegetation takes 50 years. Where remediation is going to impact property use, they must reimburse landowners. EPA in particular begins to flinch and jerk when this subject is brought up. But landowners will face an economic loss as a result of cleanup. Also, why clean up a property and leave the property upstream unclean? You risk recontamination. I have confidence in government, but Superfund has shaken my faith. Individuals may have good intentions, but the government just doesn't move. We think there should be cleanup over and above the consent decree. I really hope the money isn't coming from people of Montana, but it can't come from landowner. I've tried hard to be fair and empathize with the people involved in the cleanup process and give them the benefit of doubt. It's so large, so complex, it's hard to focus on any particular concern.

Other

- I have land not far from the river. I got involved when the lawsuits were happening, and I sat through several days of hearings. The process never really talked about the landowners. These are the people that will take care of this after this whole process is done and everyone else is gone. Even if DEQ or EPA does good work, you need landowners to buy off on it. What will happen when everyone else is gone and something goes wrong? It shouldn't be a landowner's expense to maintain this work. I'm concerned with the Clark Fork River and all the hotspots that need to be cleaned. When it's done, how is it protected, and what are the processes after that?
- I feel concerns in general about my community and how it has affected their health. Cancer, toxic waste, chronic illness, and long term health effects. When I see a lot of cancer in one time, that's one thing I wonder, do we actually have a lot of cancer here or is it just a small community so you know everyone who has cancer? I feel like progress is being made, but it is slow and frustrating, and I don't have a lot of faith in EPA or DEQ for restoration/remediation. Because there has been so much litigation, people here are really frustrated thinking that everything is getting delayed because DEQ and EPA are not getting along. Because we have been able to get a huge number of weed projects on the ground, Powell County Weed Board HAS been getting stuff done. Landowner cooperation has been great. I have had a good relationship with Brian at DEQ and with EPA. I hope we transition into best management practices, with fisheries, livestock, grazing, and how we manage public fishing access. I have seen outfitters coming from Missoula, and we don't have any well-developed access to the river. The river is healing itself, and it always affects how we manage our weeds. There is definitely stream and river restoration going on, and I hope for long-term sustainability for the river, fishing, livestock, and irrigation. It is important to our economy and lifestyle.
- There has been a lot of talk about cost, who is going to pay. We have never clearly established who is paying. The roundhouse we thought the state was picking up the costs and that is not true. That decision was made before I got here, a couple of months ago.
- I'm not a scientist, but is the particulate matter toxic? What happens if that is stirred up?

- How much contamination is there, how it will affect the city, and where it is being cleaned up? Basically the general communication to residents so it doesn't set off an alarm. Facts, so they understand why we have waited over 20 years. It is important to us as a city.
- I have one major concern: I wish they wouldn't have taken the dam out. There are still areas up here where they are removing soils. If they are removing soils, and there's a horrific summer thunderstorm, we're going to get sediments washed into the river. Those sediments will not be trapped at Bonner now. They will wash down below. I wish that they had done the clean-up upstream first. Also, it has taken years to establish the willow communities. I think the cleanup might destroy some of them. Once they are replaced, birds and wildlife may come back and use that habitat, but it really could be a decades-long process and that's unfortunate. I'm a birder and I can see the effects of these types of impacts.
- My concern I would like to see a remedy and the ROD implemented and see a compromise between DEQ and EPA. It's just the implementing.
- I'd like to see it cleaned up. Because of the length of time to get anything rolling, people affected by the site have massive Superfund fatigue. I've been involved in the TAG group. We have meetings every six weeks. We've hosted public meetings. We have a website. We put out news releases. We try to get people to participate. We had a whole ROD campaign to get people involved when they were releasing the ROD in 2004. We had to wait for NRD litigation to be completed. When the money became available in 2010, the Attorney General said, "Ok now we'll start working." But nothing has happened. DEQ worked on Trestle Area in Deer Lodge recently, but that's some of the first work that I've seen. Nothing seems to be getting done.
- I've always been concerned with the possible human health risk. I am happy that Deer Lodge was given priority, so the residents that have been found with contamination can get a cleanup. But, my #1 concern at this point is that the agencies involved in the cleanup come together and collaborate. On the main stem, Warm Springs to Garrison, the efficiency has been very bad and all the agencies should admit that and come to agreement and get it cleaned up. I think a big thing is communication and keep open lines of communication and I know that always hasn't been the case with DEQ, EPA, and NRD, open lines of communication and compromise. Dealing with how much contamination will need to be removed. I think they need to come together and compromise and get it settled instead of letting it go on and on. I would say I hope they can avoid any further legal problems or ROD modifications or any formal dispute resolutions, further lawsuits will delay the process further. I don't think it's time for extensive studies, it is time for removal. I think any stuff that isn't tied to actual contamination is not important right now.
- My primary concern is the length of time that it has taken to get to the point where we are today. It's made the public numb about Superfund. Now we're at an important juncture where the lawsuit has been settled and the State is ready to spend that money, but the public is totally tuned out. They should be involved in finalizing that NRD plan. It's a similar issue with cleaning up the Clark Fork River. It's been discussed for so long that the public is numb about the whole process. Now they are ready to go forward and do something, and I'm not sure the public will want to be that involved in making their voices known.

None

- No, I don't have any concerns about the site. The health and humans exposure about that I don't have any concern about that.
- No, I am pretty comfortable with what they propose to do. How I look at it, I facilitate the agency's efforts and communicate it to the County Commissioners. DEQ and EPA don't work well together. Sometimes the message doesn't get across to the commissioners. I think it becomes political. I think on the local level, I think we are pretty much in the same agreement.
- Not really. I just moved out here 4 years ago.
- Not really. I think it's a good idea to clean it up.
- Not really. As a landowner, I am interested in my own property, not so much all the work that goes on throughout the entire site. I want to know: What are their procedures? What are my rights as a property owner? What exactly am I looking at on my personal property?
- I certainly don't have any concerns they are doing the best job they can to correct the problems. They have many opinions I had a mining engineer friend who was certainly unhappy about them closing the dam down there. My friend is now deceased, but he was a Montana Tech mining engineer so I think he knew what he was talking about.

Order of Cleanup

- A lot of the clean-up is starting downstream and going upstream. That seems backwards.
- Not starting at the top and working the way down is a concern. If you clean up midstream, and the landowner above you doesn't clean up are you recontaminating the river? By removing the Milltown Dam, are you contaminating more? You are looking at the high priority areas. Perhaps Powell County hasn't gotten as much attention as the Butte Silver Bow area. The money from ROD is going to Butte/Anaconda. Deer Lodge wanted to settle with ARCO years ago, and that never happened.
- It is such a slow process to get started to do actual cleanup. Sometimes I wonder about the wisdom of starting downstream and then going back upstream, it is what it is. It appears that DEQ and EPA are having issues with cleanup and who's doing what to whom and who's on 1st base. It appears that there are some problems on who is going to be in charge. Technically decided but construction wise that is different. Being at the top of the stream, we would like to see our issues addressed, so we don't contaminate stuff downstream.

B.4 Where do you get your information about the site?

Multiple Sources

- I get some from Clark Fork River Coalition and some from EPA. They used to have Superfund meetings, but those have gone by the way side. I think we got quite a bit accomplished through those meetings.
- Although I am not a subscriber, CFRTAC does send me some stuff along with the newspapers.
- Websites. Talking with folks involved. I email regularly with DEQ, EPA, and NRD. I read the news articles regularly. Some over the radio. I think the info out there is good, but difficult to get

from some of the state and federal websites. For the average person, it is hard to find what website the info is on – especially the NRD website. The people I talk to are very easy to get a hold of and accessible. Brian Bartkowiak is extremely helpful and accessible. Richard Opper is great. He returns my emails.

- I pay particular attention to what's in the news media. I don't have many personal contacts anymore with EPA/DEQ/NRD, but I get info second hand because I'm on Clark Fork Coalition Board. Clark Fork Coalition is deeply involved in this whole process. I get most of what I know from my involvement with Clark Fork Coalition.
- I've got a lot of the information from NRD, some from DEQ, and some from EPA. We've had personal meetings from the different agencies. We've had some very long discussions.
- Talking to the commissioners, planning board, general public. Also, I have read a little about it on the website.
- Newspaper and newsletters (primarily the Clark Fork Coalition's newsletter).
- I don't get the paper, so there are just the few articles that I happen to see. I do get some pamphlets, and that can be helpful. I get some information from the Conservation District articles. I have also attended meetings. I get good information from the meetings.
- My first source of information is the ROD. I go to all the public meetings.
- CFRTAC. I'm a board member. I'm very interested in the cleanup and I think I can learn more by being a part of that organization. To a lesser extent, I get some information from the newspaper.
- NRD sends alerts all the time and lets us know where to read deeper. This is an NRD Board privilege that the public doesn't get. I rely on Carol Fox a lot. I only read papers and websites as horizon scanning for a perception of what's out there. Different people put a different spin on things.
- I get information from meetings, various types of local news media, and internet sites. There have been some good informative meetings conducted with a lot of the key players, for a long time. I also knew someone who was involved on the site for ARCO, so I would get information that way.
- I get some of my information from a newsletter – the Upper Clark Fork River Something or Other. I read it randomly. I also look at data on web. Newspapers are not very reliable. I have field experience, so I tend to talk with Fish and Game people and look for data.
- I am County Superfund Coordinator. When I worked at the county, I reviewed documents and set policies. Before that, I was at the newspaper for ten years.
- There is a ton of information. We have a library of technical information. We had to have a Superfund Coordinator, just to deal with it. We need more simplified, briefing type, of information. I have no problem picking up the phone to talk to ARCO, EPA, DEQ.
- We get some information from the agencies. This is all written in agency-ease. Then we get some information from the Clark Fork Coalition. This is all written in NGO-ease. The most useful thing is probably talking to individuals that we know.

- I've been involved in the Sportsmen's Club since the 1950s. I'm also on the Greenway Board --- that's out of Butte, but it goes clear down to Deer Lodge. So I talk to people at meetings and they have newsletters. I get a newsletter from the Upper Clark Fork River Coalition.
- Commission, CFRTAC publications, Arrowhead, DEQ publications, and NRD.
- I am on the mailing list. I also attend some public hearings and meetings. I was on the committee that oversaw some of the assessments and some of the projects that were associated to the Clark Fork River cleanup.

One Source

- I talk to the agencies and visit their websites. If it's a construction related, I'll talk to DEQ. For policy or funding, I go to EPA. I will access their website for information. We have a responsibility to maintain our website and post it to our site.
- I just call Brian at DEQ. He is a really approachable guy.
- I get it primarily from communication from agencies.
- The TAG Board. There is not a lot of information coming out of DEQ. There's not much information in the newspapers. DEQ does not have regular meetings. We have to call and then it is months before they set a date that will work for everyone's schedules. DEQ really needs to do a better job of communicating with residents.
- CFRTAC. Darryl Barton has been very good with sending emails, and I would go to their meetings even before being on the commission.
- Vast majority is from the newspaper.
- Just what I read in the newspapers, as the committee I was on no longer exists.
- By going to meetings.
- I've gone to meetings since 1995.

B.5 Have you attended any meetings or participated in other activities regarding the site? If yes, what did you find useful? If no, were there reasons for not attending?

Yes

- A few, NRD meetings talking about what may be other parts of the site. It's hard to keep all these sites straight. Where does one site begin and another one end? They are absolutely useful!
- Some of them are useful, some of them weren't. The ones that were useful were those folks that knew what they were talking about. One of the most useful was one of the most recent - when there was a combined meeting with DEQ and EPA talking about the Milwaukee cleanup and Clark Fork, how the contaminants initially happened. There was a major flood event that caused that way back when. It flooded the tailing piles in Butte and washed them down the Clark Fork and now they continually come down stream. Some of the other meetings were getting public input. Don't get much input if people don't know what is going on.

- There was one two or three weeks back. When construction slows down there are progress meetings in Helena with DEQ and EPA staff and we are invited to that. They are useful getting up to speed on topics and players.
- Absolutely. I have attended meetings from early on in the process. But, I think that decisions are actually made by agencies and public sway has had little or no effect.
- Yes, I have down at the Community Center, one or two. I'm involved with several projects where we have public meetings, and they are often not well attended. When you have day jobs and kids, or you live out of town, it's just one more evening commitment. They're well advertised (radio, weekly flyers). With the LEPC, we had community meetings and only ten people showed up. It's not apathy or a lack of understanding; people just have other stuff to do.
- Yes. I think the meetings are useful. It always surprises me the lack of attending by the public. They are informative and interesting and oftentimes frustrating.
- Well, the ones that have been here. Very useful.
- It's a source of info for the people. They can ask questions and get follow-ups. They are the most valuable source of information for the people. It's not the best way to get info out; the papers and the web are the best. Very valuable and beneficial, those public meetings are.
- Yes, I have. CFRTAC tends to hold a good meeting. Any info is useful, and I appreciate CFRTAC. DEQ had a technical review meeting of what was going on in Deer Lodge. Maybe a year ago, those meetings are helpful to get an idea of the big picture.
- In a rural community like Deer Lodge, meetings are important. Along the Clark Fork, it is very rural. Public meetings are one of most effective ways to let people know what is going on. I have attended hundreds of meetings for the Clark Fork River in 25 years. They are the only way you can meet people who are responsible. You can put faces with names, ask questions, get more information, find out what is going on, and try to establish a relationship for working with one another.
- Many. Sometimes meetings are useful. It's based on the tenor of the crowd, the bureaucratic factors. I've been to meetings that are very frustrating; where the talk just doesn't seem straight. I am glad that I don't work for a State agency anymore. It's embarrassing.
- Yes. It has been very useful to talk to the agencies and to have a liaison between the agencies and the landowners.
- Yes. My main focus is that 50-foot perimeter range around the river. I have some issues. I also have water in that 50 foot range. So those are the things I pay attention to. What is their plan?
- Sometimes you have too many meetings, and sometimes not enough. EPA's meetings can be pretty general. I think sometimes they don't own up to stuff, or put it in a light where "that was then, and this is now" and the recommendations have changed. From a public health standpoint this does not make a lot of sense. Now they are finding out there is contamination down below 2 inches, and they are redoing this. It's really hard to get people engaged again over 20 years.
- I think they are informative, but the last one I went to was discouraging. People had gone from being hostile to being complacent and didn't verbalize much. I think they are still imperative to

have. It's like voting. They can't address their concerns unless they vote or come out. I noticed that they make announcements in the local paper, and I think outreach and education are huge.

- Yes, mostly CFRTAC or DEQ/EPA meetings. I've gone to most of them. It's pretty useful. I've been close enough to it and doing the soil surveys that I have a good background and knowledge, but it's very complicated.
- Yes, at the very beginning. Now it's not as useful because we are going over the same stuff. As new projects come along, they will be able to get people more involved. It is often the same group of people. Daryl had a meeting out at the racetrack at the fire hall that was well attended. People in the outlying areas are more engaged with what's happening on their land than those folks in town. Kids are missing out on educational funding to be more involved. Put them on the river to measure and take samples. When they come across a green mouse bone, they will know why.
- Yes, there was just a meeting in Anaconda that was pretty useful. Some meetings are just asking questions. It's great, but I'm not really sure if they heard my concerns or not.
- I've attended public meetings in is this area since 1996. People I know have been "meeted" to death. It is difficult to get people to come to meetings - people that used to pack the community center. The best thing in the world is Brian driving up and down the road. We need to have more boots on the ground, more activity. There are concerns now about selective sampling. Start upstream and come down. Now they are jumping some places, and landowners have wanted to know why they were jumped over and why we are going downstream and then back upstream. It hurts trust, when people wonder why some places are a higher priority.

No

- I attended some for Milltown Dam. I think they are positive, but informative, not helpful.
- No, other than the gentleman that came to rotary. I don't feel like I have a vested interest in it.
- My plate is pretty full, plus when I go to those things, I am off in the corner and people try to trap me into to their things. I think I am more of distraction.
- I just can't do it, time-wise.
- I haven't gone to meetings. I try to keep up with things by reading our newspaper.
- I have been pretty active in the community for the last 20 years. Like everyone, my time is at a premium. However, I have a growing interest in following what is happening with Superfund activities in our county.
- I avoid meetings. I get so tired of politics. I just talk with individuals and try to look at data and get the real story.

B.6 Did you know that DEQ is responsible for leading the cleanup at the site? If so, what is your opinion of the work that they are doing?

Favorable

- I am favorable of some of it. I think it is an insurmountable task to clean up the river. If it were me, with a limited amount of resources, I'd focus on hot spots and leave the rest alone. I see the logic of cleaning up the slickens, but not the rest. Some of the good stuff they have done is where the vegetation is gone and they revegetated with willows and grass. In other areas that had already taken care of itself through natural course, they went in and dug them back up, which set them back a few years. I don't see value in that.
- In Powell County, I have a positive opinion. They have a very defined task, yard removals and tailings. They do a good job with property owners. The sentiment of the county is we are in the middle of Butte and Missoula, and we don't get what we want. Especially Butte. In the reallocation of funding, the geographic extent was from Garrison upstream and is now Warm Springs Creek to upstream. So, we would be out of the taking for the \$35 million for projects (what the state received from ARCO settlements). It's not a fair distribution. It seems when the ROD was made, Butte got a more favorable treatment and more money sent that way.
- I think the river cleanup in the yards was done extremely well and fast. It is probably one of the only projects I have looked at and said "Wow look at the government in action." There was a house on Milwaukee that they cleaned up within days. So that's really good. They were getting the backhoes next to people's houses and the people were really pleased.
- Mary Ann (mayor) would know if people in city limits had issues. For the most part landowners have been happy, although some have said the sod is a problem. They really care about their grass and how well it grows and how green it is. I would say the quality of the work is great and above what was expected. The quality of the work is excellent, and the efficiency of getting work done on the river it is not. We haven't seen much cleanup on the river itself.
- Based upon what I read in the paper and I haven't heard anyone speak poorly. I would expect they are doing a good job.
- I don't know that much about DEQ's work. I think, for the most part, it's favorable, although, in some areas, it seems like overkill in terms of the time spent. I'm not privy to everything that is being tested. Maybe they are doing some underground testing or something that I am unaware of. But just looking at them, it doesn't seem to require as much time as they're putting in.
- The work has been pretty good. I went on the bridge tour. The work looked good this fall and winter. I've looked at the loop on the East Side Road, just south of Deer Lodge. Most of the work that DEQ does, I understand. They're doing more removal and less in situ, which I support.
- I think most is favorable. I don't have any problems. I haven't seen any problems.
- They are the boots on the ground. I think they have done a great job. It isn't like in private business where you can make a decision alone. EPA and DEQ need to communicate and give and take. I feel all the slowness is from not pulling the rope in the same direction. We can't have Phase I done within in the year because there are other decision makers, and they have to

communicate with EPA. The parties could work better together. I admire Joel Chavez, he did a wonderful job, and they did great in Silver Bow. They would hit the time frame and be under budget. I have the same respect for Brian Bartkowiak.

- DEQ seems a lot more beneficial locally - better than EPA. With EPA, it might take years to get a question answered. EPA has to push it all the way up the chain of command. DEQ is right here. The top is right here in Montana.
- They have been so supportive and easy to work with – although I don’t care for the trestle design. They are here in a heartbeat. We were able to facilitate, and have things done. If you hopscotch around you always have the issues of recontamination. Most ranchers have not given access, if you can’t cleanup, when you have a flood you are going to re-contaminate.
- Yes, I think what they have accomplished is positive, although frustratingly slow. I get frustrated when contractors don’t contact me for weed control. I have no idea how to contact them when people are unhappy. Mainly what we do is just go ahead and fix it, which probably isn’t the best use of our resources. We’ve actually formed a working group and have been able to implement weed efforts, and we have leveraged the funding with other sources of funding. Weed seeds transport down the river, got to get with other agencies and fund it. We still don’t have the piece above me, but cooperative efforts are spawning. I think the funding kind of sat here for years while this position was vacant. I like that we were able to get a hold with DEQ and I feel like Brian Bartkowiak has really appreciated it and landowners are more open and willing to work and talk with him. You wouldn’t believe how many complaints we get. Spend \$6,000 on their site, and then they are unhappy. Brian Bartkowiak gives us the plan of what they are doing. I think he has made great efforts. I think all of us could work towards communicating better.
- I am aware of some work. I’m not sure if DEQ is working on Beck’s ranch but they’re hauling away a layer below the topsoil, and I think the work is fine. I think they will work down the Clark Fork River and I think it’s all fine work.
- I sit on the NRD Board, so I got to go on tours several times year. We went to Silver Bow Creek, the Governor’s Project and pre-work they did there to see some of the testing that they were doing. I think they did pretty good work. There was a period of time where nothing was really getting done. EPA and DEQ were not even speaking - like little kids. That was very discouraging.
- From what I have seen, the work is excellent, and I have had no complaints. If there was, I would have a complaint card filled out and you would have it. They have done an exceptional job.
- There hasn’t been a lot of work done yet to date. It appears they’ve proposed a good clean up. In general the State does a really good job with remediation and restoration efforts. We like Joel Chavez.
- The on-the-ground work (Silver Bow Creek) is nationally recognized and very unique. All Montanans can be proud. The planning and coordination with EPA has been frustrating, going back to 1983. The magnitude of the site is such that there is no manual that you can go to, where it will say we have to do this or we have to do that. The time that it’s taken to get to where we are today has been frustrating, but understandable. Nothing like this has ever been done before.

Neutral

- I don't have any issues with the work that DEQ is doing.
- It's hard to judge something on an ecosystem and determine what they have done. It appears to be doing well, plant life is thriving and the fish are coming back. The source is not being mitigated. We get a spike of arsenic every time there is a storm that's pushed from the Warm Springs Ponds. We haven't fixed some pretty critical issues, and all of us on NRDP know that. After years, we have biological adaptations and willows. Nature does amazing things.
- Neutral. I haven't been actively watching the Clark Fork, and I can't get to Opportunity to see what's been done. In Opportunity, I'm worried about it leaking into the aquifer. Hauling material from Missoula created a dust bowl in Opportunity. What was in that dust? The arrogance of Missoula politicians to move waste here is wrong.
- I don't have a strong opinion one way or the other. It's ok.
- I would have to have a little more information on what DEQ is doing, before I could even comment on it. I do think that some of that resource funds shouldn't have been spent the way they were. It was not supposed to be for buying private lands for river access, it was for cleaning up things. It shouldn't have been used to enrich private parties.

Unfavorable

- I'll talk about the work that they did coming down from Silver Bow Creek. In some instances they made a new channel, they developed ponds where there were none before, and allegedly there were water rights changes, but I didn't see any notices of that. In order for this project to be successful, they will need to irrigate to keep willows alive. Also, there was RipES testing done a few years ago. Now, they are re-doing all of that work. This is a waste of money.
- Sometimes I hear that DEQ isn't acting fast enough - the Greenway, for example. People say DEQ and EPA have little differences and can't work them out, so it affects the community. They don't see eye-to-eye on certain projects.
- I would give DEQ a grade D, and I think that is a gift. I'd rather have DEQ than EPA, but I had higher hopes for efficiency. I think they'd like to do a good job, and I don't know what's hindering them. I'd like to see them perform at a higher level. They need to shake off the bureaucratic shackles and get the support of the governor. We've been dealing with this for decades. Let's just do it now. I am awfully impatient with the progress.
- I work with citizens, and many of us felt we had better access to DEQ than EPA. We thought DEQ would be more open and available. We thought that, with all levels of State government relatively close, that we could iron out any bumps and work well with one another. We urged DEQ to have the lead. Joel Chavez moved right along on Silver Bow Creek. Maybe it wasn't absolutely perfect, but things were getting done. On the Clark Fork, we are very disappointed. There's not much information coming out. We have to engage DEQ to get information. For two or three years, there have been disagreements between DEQ and EPA - "How clean is clean?" We've been told in a vague way this is why we can't move forward, but we are not privy to the content of the arguments. Richard Opper said "In 2011, we'll start the cleanup." That didn't happen! DEQ ignores deadlines, and there is no accountability. Then DEQ seems defensive when citizens express frustration. I'm sure it's not easy, that it is a big undertaking, and that there are

many interested parties with conflicting wants and needs. But, it's as if DEQ is staring at a blank piece of paper and no one has learned any lessons from Silver Bow Creek.

B.7 What do you expect of DEQ regarding the cleanup of the site?

- I expect that you would have a normal river again as it was once was. A blue ribbon trout stream as it was once at the end run.
- For them to fully follow through on the yard programs and soil removal programs and ownership in the project that if a homeowner or community member is not happy that they would come back freely and make it whole again.
- I probably have too high of ideals, I expect it to be done within a reasonable time and done right, its seems sometimes public health is not even mentioned and they talk about fish kill , no direct link to harm kill or maim a human being, you know if can't be good for you. It should be a main concern for generations to come.
- I like to think that cleanup actions will be protective of human health and safety and environment. I think by law that's what has to be done. That means that contamination is out of river, in safe places, there is no exposure, the action level is adequate.
- That it is done in the best way possible. I grew up in Anaconda, so when they put in the Old Works Golf Course, they put in topsoil, but under it is polluted soil. I would like to see as much can be removed is removed. It's nice to have a golf course and something nice on a disaster. It really bothers me, if they are cutting cost at the detriment of the people.
- I expect it to be cleaned up and I expect new projects to be regulated in a way that Anaconda County never was. I expect accountability that remedies will last for several generations.
- It would be ideal if the stretch of the Clark Fork River from Warm Springs Ponds to Missoula would be identical to the stretch of Silver Bow Creek from Butte to Warm Springs Ponds.
- All contamination removed, new service industry, and more inviting and attractive.
- I expect them to put it back to what it was before and get rid of as much contamination as humanly possible.
- I expect DEQ to have fully-remediated the main stem of the Clark Fork River, paving the way for future restoration work and enhancements to the fishery from other state programs for other programs such as NRD. I want a clean healthy river. I like fish. They are my friends.
- When it's all said and done, the vision that we have is a cleaned up river with successful restoration. Water quality is improved and we have increased fish population. The Clark Fork River should be an economic resource for the communities and people that live along it.
- I expect to be dead before they are finished. I would like a revitalized Clark Fork River where the river system is made whole, producing all of the aquatic life and riparian life and an abundance of diversity, which would be expected in any undestroyed system. What I expect is something improved, but maybe 50% of the capacity of this ecosystem.

- I want the best thing we can get for Clark Fork River because this money will dry up and everything will go away. We need some money left up to repair things so that when something goes wrong in the future, the landowner or the State doesn't have to pick up the tab. There is no way of knowing everything up front. When the process is finalized, I hope that we not only spend the money wisely, but we think about long-term protection.
- I hope it works. I hope it's cleaned up. I hope that the landowners are taken into consideration and their property is somewhat protected from the cleanup. And the powers to be making these decisions are making the rights one and they are successful with it.
- I expect it to be real good, once the river itself is cleaned up.
- I want the stream bank to be restored. Hopefully it's done, and the job doesn't have to be worried about for the rest of our existence on this planet. Hopefully, it's left in a natural state.
- I hope that there is some type of venue for people to express their concerns. I think if something got missed or long term effects that there would still be some kind of resource to communicate those concerns and get a satisfactory response.
- I expect DEQ would remove most of the slickens, the barren areas. Replace them with clean soils and some topsoil so that the river bottom would look similar to the land that I have above the floodplain. They will never look totally the same, but soils-wise, it could look similar. Hopefully, it will be very productive land for growing grasses, shrubs, forbs for both livestock and wildlife. It will never be like it was before 120 years ago, but it could look a lot more like that than it does currently. Some of it is starting to look really good right now.
- You expect the environment stays as close to what it is as it can. There trying to reclaim that as much as they can and they have it all seeded and grass growing. Like in the slag pile, when you use to drive by the pile it was like a sand storm.
- There is always a problem with waste left in place. That's a danger if there's no one (DEQ/EPA) to monitor human health and the environment in 20 or 30 years from now. It really troubles a lot of people. I mean now we're tuned in, but then it stops and drops from people's consciousness. Maybe people aren't following so much later on when the agencies are gone. What happens when land use changes, or there are changes in the stream from nature or animals, cattle?
- In another 20 years, we want a healthy river. That is our biggest goal. It has become healthier, since the 80's there are definitely areas where there are slickins. We want the land to be healthy and revegetate. If that happens I don't know since we are an agriculture area, and for the recreationalist. A nice little walk along the KOA campground down to Kohrs. The cleanup they did at the Blue House by Grant Kohrs, important for the town people to see what is going on.
- I expect them to get it cleaned up to a reasonable set of standards and get out of our hair!
- I was pleasantly surprised to hear that a guy recently caught a bull trout in Drummond. I was surprised the water quality was that good. I don't expect it to be the historic fisheries that it was, but we really don't have a benchmark, because it's been more than a century since we knew what the "natural" fishery had been. I grew up knowing the river was polluted. My dad

worked for the Anaconda Company and that's just the way that it was. I expect there to be a healthy fishery, like other comparable rivers and streams in the area.

- I hope it turns out being clean water again. I want to see fish. There's some fish right now, but I want to see better fisheries. And I want landowners to provide better access.
- I want it done right. When Brian says we need to take time and do it right, I say okay.
- I don't expect I'll be alive. I expect the slickens will be more productive than they are now.
- A healthy river and a healthy aquifer. I expect the watershed has to be healthy.
- Internationally significant results, really. I'm going to Norway to look at the Copper Mine. We already have a water recycling/cleaning plant from France. This is huge. It's a huge site, and it should be internationally significant. No one has really dealt with pollution on this scale before. And Norway has STRICT environmental laws. I just want to make sure we look at best ideas out there. Eric is helping me. He just found literature about some innovative clean-up published in England and set the bar high and expect results.

B.8 Would you like to be involved in the process? If so, how?

Happy with Current Level of Involvement

- I am plenty involved. I have so much other stuff going on. Unless it directly affects me, then I get pretty involved. They did assessments on our property, weed control and any hazards. They didn't find any on the particular properties I own.
- I feel like I'm involved as much as I can be or will be. I live in the middle of it.
- I feel good with my current level. I have been more involved and then not. It cycles.
- I'd like to stay in involved, just as I am. I'm on the Greenway board, etc.
- I feel I am involved enough. When I see Brian at the county meeting that is great. Mary Ann does a nice job of sending information to me. I am on the email list. If they could communicate between themselves better that would be great.
- I feel like I'm as involved as I can be.
- I think as a commissioner I am about right. Brian, with DEQ has been very good with coming to us and letting us know what is going on. Hopefully they will set it up on a quarterly basis since more activity is going on. They have certainly helped with dust mitigation and been helpful to the residents. Now if they would just pave all the roads, I would have it made.
- I think it's just right. I have to work in the entire county, and it's a huge county. I need to regulate how much I get involved in things.
- I am about as involved as I want to be.
- My level of involvement is good right now. Considering the fact that they haven't really started major cleanup on the Clark Fork River yet...once they get started, I want to spend more time. So far, it's good. That will change when they get down this way.

- I think what DEQ is doing is fine. They are trying to get contaminants out of the soil. I really don't know how I could be involved, other than going to meetings. I haven't had time.
- I feel my level of involvement was very heavy for a number of years. Now it's about what it should be. I am older, and I don't want to be that involved.
- I am right at the level where I want and need to be.
- I am very involved and want to be involved.
- I am happy with my level of involvement.
- I got a day job. I am on lots of committee. I think I get enough information.
- I would like to be better informed but not necessarily involved, my plate is pretty full.
- I feel I am effectively involved. I would be like to spend time assisting this process in moving forward, but I am impatient with responses I get. We need to cooperate, as friends, to move forward. I think I have been awfully patient, but I think it will probably go to mitigation.
- I feel like a lot of the process was done before I got here. I can call Brian whenever - he's pretty approachable. I feel like I have a lot of information and -whether it was dollar amount or cubic feet of soil being removed - almost every question has an answer. I have been kept in the loop.

Would Prefer to be More Involved

- I would like to be more involved. My Masters degree is in Field Ecology. I would like to be involved in hard science meetings. I would enjoy discussing this and sharing information from my years studying the insects with my students, to my experiences as a birder, and with my educational background. But I am NOT at all interested in political, public kinds of meetings.
- I like to be involved and enjoy learning about Superfund. My goal and priority is to make sure things are safe for public and the environment, it's my passion. I'm not sure how to become more involved.
- I am fairly involved with my schedule. When the work is closer to me personally, then I want to be more informed. I want to be much more involved than I am right now. Right now, when it's not on my property, my level of involvement is fine.
- I think I would like to be more involved. One of the things we worked on hard was the vegetation that goes back in the areas after they do the work. They have to have grasses that will work long-term. The Watershed Restoration Coalition has vegetation test plots. The agencies spend money, and they get seed somewhere else. The seed grows for awhile, and then dies. Some vegetation needs to be from this area so that it will last. The Watershed Restoration Coalition works with the Conservation District. We need them as a sponsor so we can apply for grants. We've met monthly since 1998. We can do testing. We just got another grant to look at these issues again, but we can't seem to get a commitment from DEQ or EPA. It's very disturbing to see what they are planting without even talking to us.
- I'd like to be more involved. The State has more than \$100m from the NRD Claim in a settlement that ended 25 years of litigation. Governor Schweitzer extolled the virtues of a restoration

economy. The NRD money was available and could be used to engage all sorts of contractors and construction workers. It would create a lot of jobs in Montana. But there's no urgency. It seems almost impossible to be more involved because we don't get straight answers. There are these stories about EPA and DEQ fighting with one another, but residents don't know exactly what the fight is about. If community members are not kept in the loop about the plan, delays to the plan, implementation of the plan...it's just hard to have a voice.

- I don't get any information, which could be my fault, because I don't search for it. I don't have enough time. Maybe a website, updates, or a summary of what's going on would be helpful to someone like me. I could go and check and see what is going on and how things are progressing. At one point, I saw a big timeline but not sure if it is still in existence. We were getting somewhere with John Wardell, but since he passed away, seems like it fell apart.
- I would like to see all the direct agency people (the Rogers and Brians of the world). I'd like to see more involvement from the administrators and more presence here. Brian is here every day and Roger has been filling in his knowledge of the site. They respond well. I would like to see their administrators be in more contact with the commissioners and have more presence.
- People want to know that government, contractors, etc. are participating and sharing information- at least internally. DEQ should be doing PR (here's what we're doing and here's what you'll see). Make it attractive - not overwhelming. Citizens want a passing knowledge of things. If you see that equipment out there working, what's it doing? They've been working here for a year, and we don't know what they're doing in our backyard. Having the DEQ reach out to us would be great.

B.9 What do you think is the best way to communicate with residents near the site?

- Stop changing the game plan - the rules, the way the money is dispersed and what it is dispersed for - some of the things that happen make me shake my head. Public meetings are very poorly attended. Unless it directly affects people, they are not interested. Best engagement would be newspaper articles to let people know what is going on. Deer Lodge doesn't have the money or anyone to lobby on their behalf, so we have received very little in the way of assistance. Butte and Anaconda have people specifically to get funding from that settlement to do specific projects in their community. They are pretty successful in that.
- Notices in the paper and community center facilities. Come down and sit with the city commissioners and council and have that type of interaction. Radio and the newspaper. Quarterly meetings with the County and City Planning Boards to provide the members with updates relating to the CFR Superfund. Have DEQ or EPA provide timely information to the County Planning Department for posting on the County's website. Place an informative kiosk in the Courthouse, or have the agencies provide the County with placards for placement at the Arrow Stone Park or at any of the recreational trails the County is proposing.
- It's been going on for so long that I think we really have reached a stage of general apathy. Individuals that do have concern are newcomers. They want their children lead tested and info about arsenic. Sometimes we don't know exactly where we are in the process, is it going to be finished, when long term management for the site, down the road in 20 more years. I think, maybe they have just lost interest. They just see stuff going on, and it's no longer a priority to

them if it ever was. I think that's why you don't have the community engagement that EPA or I may want. Not sure how you deal with apathy and lot of times they say what's the use? Not sure how you change that or just do stuff the people want.

- That's really tough. People get tired. You still have to have good quality briefings, papers, periodic community meetings. Let people come and hear what's going on. Some will be there, some won't be there. It's overwhelming to a lot of people.
- You need to give details- this is what we are going to do and the positives of it. Direct people to the solution and emphasize the history. Say your yard is a toxic zone and this is what we are going to do about it. People who are involved in remediation don't have the historical outlook to realize how sad and damaging it has been to residents.
- I don't know, you have to have public meetings even if they're not well attended. Work with non-profits to get more news out there like flyers, newsletters, e-mails, etc. The CFR Coalition, they are well-funded. Buying land, EPA and DEQ need to work with them to make sure they are following all of the proper protocols.
- Some things that have happened are good (the golf course, NRD activities in this area) but some are not so good (yard clean up, Milltown tailings moved to Opportunity). People think it's never going to end. Planners at the state and federal level need to come out and talk to as many local people as possible in their groups. In Missoula, of course you will talk to Clark Fork Coalition. Interact with Rotary, Kiwanis, etc --- those groups that don't necessarily fall under the definition of a "conservation group." You must make SURE things are happening on the GROUND. The worst thing that could happen is that if the public comes back out, and then nothing happens. If EPA, DEQ, NRD or the Governor's office slows it down because some i is not dotted or some t is not crossed, you will destroy the public trust.
- Seeing your presence here, visual appearance of what's being done. Just having you here today has been terrific.
- If you want to get people involved, start the cleanup. People have said they don't think it will be cleaned up in their lifetime. With the removal of the Milltown Dam, it snowballed and the work got going faster. We just have to get that 1st step of the river cleaned up.
- I think they are doing a good job in the newspaper and about as much I am interested in. I don't know if going to the expense of mailing a newsletter would give them anymore info they don't already have. Meetings are attended by people who have a vested interest. I don't think kids care.
- The periodic CFRTAC meetings are very helpful. I tend to like to get information from email. Status reports would be great. Brief executive summary reports that we can use to keep informed of highlights and know who to call if we have any questions. Most people in the community don't give a rat's rear part with what's going on Clark Fork. But with the ranchers, it is much more paramount in their mind and special efforts need to be made to make communication with them. For them, door to door, face to face meetings work well. Meetings held at the Race Track fire hall. They might go if it is held out in their neighborhood or at their neighbor's house.

- Meetings. The community is very rural. People learn in different ways. Some people get news from websites and data. Your challenge is to come up with different ways to engage different people. In Deer Lodge, many people get the weekly newspaper. A number of volunteers have worked as advocates for the river. They need a listserve or something from DEQ. It would be great if at least once a month, there was an update. Even if the message was, “Nothing new to report this month,” it would be helpful to know. Or maybe a message would be sent via the listserve, “We’re meeting with EPA over XXXX this month.” This would create subscribers, and people would begin to find news that way. DEQ should hold quarterly meetings. They may not always have good news, but being upfront and honest with bad news is much better than no news at all. If they could have someone that communicated in an honest, open, forthright way, we’d be better off. When people don’t hear what’s going on, they make assumptions that can snowball into perceptions of the worst possible scenarios.
- I don’t think people in the agencies that are not working on the ground with the general public have an understanding that the average residents’ communications skills are very poor. We have a lot of people in our area who are functionally illiterate. They never read in any substantial sense. So written communication, no matter how much you dumb it down, it is not going to be effective. The readers are a small minority. There are many very bright people, but it is not a community of readers. People are sick of meetings. The process has gone on a long time. Also, commitments are made at meetings and are not followed up on. It embitters people, and discourages them from participating. This only has to happen one time and people will talk about it for years. Meetings are the most effective method, but a lot of people won’t go anymore. We need straight talk, not some bureaucratic speak. No-one wants to be lectured to. People would much prefer a polite, informal dialogue.
- There are so many different personalities. Some people will just automatically be skeptical of EPA or DEQ. I think the Watershed Restoration Coalition could help to get the landowners to work with the agencies. We could help DEQ and EPA to communicate with these folks. The agencies could use our help. We’re very interested in the final results on our resources. We live here and want it to be the best we can get.
- Go to people's houses and introduce yourself. No informational meetings at community center. You get farther and longer with one-on-one conversations. You're going to engage people; talk to those most impacted. They'll talk to twenty people, and then those twenty will talk with another twenty people. Then when you have the community meeting, people will actually come. They have a human connection with you and then you'll get a lot more input.
- Other than just the newsletters...I don’t know what else you can do.
- I want a personal contact to say where they’re at. Public meetings are good. Pamphlets are good. DEQ needs to update us regularly on where they’re actually at. The timeline, like with most construction projects, changes. Construction projects rarely stick to the original schedule. DEQ needs to regularly update the community on these changes.
- I think it would be great for Brian to stand behind me. Soil amendment extraction project would be a positive thing. There is frustration that they don’t use local contractors. The weed spray contractors they have, come in, spray and don’t see them. We’ve tried to get Brian to use locals. Make sure contractors don’t spread seeds on their equipment. They have been good about that. Our best communication is our project administrator going to door to door and

calling people works best. Definitely, one on one communication. It works so well to have people of Deer Lodge working on the site, because you see them out in the public and the more they know my face and remain approachable, that has worked really well.

- It's a challenge to keep people engaged. My neighbors don't go to meetings anymore. They don't see anything happening on the river. They have kind of given up. When work on the Clark Fork River starts, they may become more engaged. Earth-moving may inspire people to become more interested and go to meetings.
- Well I am prejudice with the newspaper.
- Identify the target groups with the highest interest and go to them. You need to be where the directly affected people are (like sportsmen). They are the most likely to be engaged and ask questions. They have opinions and hold monthly meetings. (Anaconda Sportsmen Club- Lorry Thomas, President and Chris Mavchion). Landowners have meetings in their area. They have coffee and cookies as enticement. I don't want to point a finger at DEQ. We could do stuff too, but they could call the court house and ask who do we talk to. Even if work is already done, it would be good for the county to be informed. My questions would always be along the lines of: Did you get it all? Did you want to get it all? What did you find? What did you remove? Is there a restoration plan? What kind of sampling did you do? I want them to restore the river to its original channel before contamination, with trees, shrubs and diverse vegetation. Public meetings are mandatory, though not well attended.
- I wish I had a good answer for you. I think when they clean up the trestle bridge, perhaps inviting the public to see what they have done. I don't think DEQ is getting enough credit for what they are doing. Brian has been a very good manager, has been very low key which is a good thing. There are really a bit of angry people. More in the newspaper would help. Even if DEQ managed to do a tour, with engaging Rotary or some of the teachers at the school system, an educational class to do so. Take the kids out on a tour. You become so blasé about it, once you see the result and the why it is being done that might be a better avenue. We've hauled "x" numbers of dirt, big deal, comparing the amount of dirt to a mountain you might get somebody's attention.
- You know I see more apathy. People don't attend meetings because there's been so many of them. So less and less people attend meetings. I'm not sure if you were to do a publication and if you could get it to them...I'm not sure they would even read it. I think a lot of information is available. If people don't want to take the time, you can't force them to do something that they just don't want to do.
- It's been going on for so long. Older people say, "the hill" when they are talking about the smelter. But the kids don't really know what that is. It's been 30 years since the Smelter last operated. Why don't you put together a PowerPoint of historic pictures and comments from people that were around back then so that we could communicate these changes? People under the age of 30 have not experienced any of this. The river didn't look that bad, but the river was aseptic; it was basically a heavy metal sewer line.
- It's hard. Even my sportsmen are hard to engage for the long haul. Sometimes I get a good crowd. Sometimes I don't get very much. But I call all my members up every time that there is a

meeting. So I suggest that you regularly talk to all the key players and give them shout when you have something that you'd like the community to know.

- I keep saying boots on the ground. Make sure Brian keeps going to the city council meetings to let them know what is going around. Brian has been very visible. Keep being visible. Seeing something going on is the best way to have the community involved. Presence equals action.
- That's a good question. People are tired of going to meetings, particularly when their comments seem to be ignored. Policy doesn't seem to be implemented based on what the residents say.
- People become so frustrated, they don't care anymore. I don't know. I've wondered about it. In Butte, they've taken settlements and things that I don't think are as good as they should have been, but that's what it was. So we're stuck with that now. One problem is that the community members don't acknowledge when good things happen. EPA and DEQ should have a celebration for milestones. People are so apathetic to Superfund. People don't acknowledge anything good, but if a property deal goes south, then you hear about it for 10 years. How do you get past that point?
- You need a resident DEQ employee in Deer Lodge. You've got non-profits, CFRTAC, etc., but they are not DEQ's voice. We need a person who can deal with questions and answers, information dissemination, Deer Lodge is way too active in its gossip chain; you need to nip that in the bud before it spirals out of control. Darryl Barton is great, but he is not a DEQ spokesperson. Especially with the trestle, other issues, etc.

B. 10 Who do you think are the formal and informal leaders of your community? Who do you trust?

See Section 1.

B. 11 Can you think of anyone else we should talk to?

See Section 1.

B.12 Is there anything else you'd like to add?

- I would just like to see more done for the county of Deer Lodge before all the funding is gone. I think there is ample opportunity for projects that should and need to be done. I do know that in general the entire community feels like it is getting the short end of the stick when it comes to that. They heard and hear about the millions of dollars being spent and never see any of it being spent down here.
- The county gets updates from both DEQ and EPA and we express our comments, most of that was back in the design phase, and how they are going to implement their task. We do not have a lot of contact with property owners. I think that's a good thing. They know who they need to see and talk to, and Brian is a very visible individual in the community. He has worked in this area for many years. They do a good job in identifying who is involved and what is going on. "Hey your truck took out my fence," and they say "Hey call Brian, call DEQ". We don't really take the lead and I don't know if it was designed that way. I am unhappy that DEQ did not allow fill material to be taken to a site or Brownsfield site.

- I am happy that we have been able to do the lead testing that we have and do the arsenic testing that we did a long time ago. Implementing the arsenic testing may help again. Supposedly there was never a high level of arsenic found in the kids, I have looked through some of the studies, unless you are a scientist, you can't understand it. Some of it looked to me that the results were higher than we were told. A current study using modern methods might be beneficial to put any doubts to rest. The lead testing is good. We have gotten ongoing well testing and water replacement where the wells were above limits, well permitting assistance. We are doing the lead testing out of public health funds, for all kids in head start and the WIC kids. We will actually do it for anybody that asks. We sometimes come across a kid that does have elevated lead levels and through education and nutrition we are able to take care of it. Not sure if we are doing enough. There are some positives. I think the fish are better off.
- We need help when people run into unexpected contaminants. Those costs should not be borne by the contractor. Whatever costs to development are associated with Superfund should be compensated. We should have a HUGE redevelopment fund --- we got EVERYONE's waste. I have to say that the Opportunity Park was handled well. Julie Dalsoglio deserves credit. The \$1.5m Park is a huge improvement. The county did some sampling (vs. Arco sampling) and we had a discrepancy in terms of contamination. I didn't want to construct the park and find out later that the contamination levels were too high and then we would have to tear everything apart after it was all built. EPA did the removal action beforehand and that is VERY important. I think it's ludicrous to construct something and then find out if it's polluted and tear it apart. Of course, testing should be done first. At the same time, I'm sure the neighbors across the street from the park say what about my yard? What about my 3-year-old playing in my yard? Protocols are not well established. For example, when people dig water lines or sewer lines or do work in their attics, how do we know that they are properly protected? Homeowners may be doing this work and how is human health and safety protected? How much exposure should these people be enduring? Are we really protecting people? Give me some assurance. It needs to be laid out better. We've come up with systems about how to deal with contaminated materials, but sometimes people get it and sometimes they don't...or they don't even realize what they might be dealing with. You got agriculture all along the Clark Fork River. They're dealing with tailings along the banks. Sometimes this can become a Human Health and Safety, as well as an economic issue for folks.
- I think Brian has done a great job communicating with people. He is here a lot. I know that it is mostly his job. Brian sits at job sites all day, and answers questions for people driving by. I don't think I have ever seen anyone that involved. That level of empathy and involvement is impressive to see.
- Not that I can think of. Just being here and asking those great questions is wonderful.
- Nope. Thanks for the opportunity to speak out and give my two cents.
- One of the things at the last public meeting ~3 months ago, referred to sequencing. We always thought they'd start at the top and work down. Now, it looks like they are hop scotching. They were going to start above us and then go below us and work on Bryce's ranch, and I don't understand why. It felt like punishment, actually, for being an advocate for the river. Our property, with high water like they had this last Spring, would contaminate below us. It did not feel good. It seems contrary to what we understood the process would be. It looked like they were starting with State parcels. I asked NRD why State parcels have priority over private land

and they said, “Well, we want our lands cleaned up.” This seems like they are serving their own self interest, and it was not what was said and not what we thought was agreed to. The Clark Fork River begins at Warm Springs Ponds where Mill and Willow Creeks come in. The State parcels are below that. So, again, it seems like they should be looking first at the private landowners closer to Warm Springs Ponds. We’re in the middle. Come on! The private landowners have been concerned about this for a long time. We have been very patient.

- This clean up has been in process for more than 20 years. People keep calling me to ask my opinions about community involvement, etc, but the agencies haven’t addressed the real issues. I think everyone would be happy if EPA/DEQ just came up with a sensible policy, advised everyone, and actually made more forward movement. We can do this. We can do it well. We can do it relatively quickly. But we can’t do it if there is bureaucratic infighting and we can’t do it if we don’t trust one another. The resource deserves better. The public deserves better. Show a little class and step up to the plate.
- Communication is so important. I hope as we move forward, they’ll get a little bit better with that. Landowners are such a crucial part of what happens later on. This work can change their operation and it ultimately can change their whole life. The resource needs to be protected; what is done now is going to be preserved and maybe better 20 years from now if they work *with* the landowners. I might sound like a broken record by now, but this is so important to me.
- Whenever this stuff happens, MACO and MLCT educate the commissioners, mayors, etc. about looking good when there's a flood so you can point your fingers at someone else when you weren't around. They need to be more available and it's easy to criticize and ignore the good. MACO doesn't teach that. MACO teaches people to run, hide and point the finger. I'm pissed off at the state too. I'm not politically correct, but I say I work hard and report the good. That's why I don't trust leadership. They are scared of lawsuits; scared of this, scared of that. If you can't stand the heat, get out of the kitchen. Same with states, feds, local government, even volunteers. Do what you got elected to do!
- I appreciate that you have been able to do this interviews and I agree that with you the public record is good. And it’s nice to express views that people may not want to do publicly.
- I don’t think the cleanup of the Clark Fork River is on the top ten of minds in Deer Lodge. When I go to coffee, nobody talks about it. Maybe it’s because people are used to it. Maybe they just think, “This is the way it’s always been. What’s the big deal?” We have this place on the edge of town, Arrow Stone Park. We had a doctor in town for a while and she was panicked that we were letting our children play in the heavy metals. She was very vocal about this. Nobody would go see her anymore, and she moved on to another community. She thought our kids were playing on a toxic dump. But people here think, “Well, I played on those soils and I’m still alive.” The one thing that people key in on is: Cancer. People say that cancer rates in Upper Clark Fork Valley are higher than in other places. If we could show that, it would actually get people’s attention. The scientific world might be interested in the river, but regular people look at health. One of the first years I was teaching, heavy winds came in and blew dust all over. Arsenic settled from the smelter and it killed 200 antelope in one day. That was an attention grabber. I think you should pursue something in this direction. Educate people about this sort of thing. The data has to be out there. There was a study in late 1960’s --- kids that went to college from here underwent arsenic withdrawal symptoms. That was a big buzz. The

emphasis might be on *human health*, rather than river health. And then how you are fixing the river health is really by fixing human health.

- I'd just like to see it cleaned up. Well, there is one thing. I think they're putting too much in Opportunity Ponds. Everybody knows they had a tough time getting stuff to grow there. I don't think Opportunity Ponds can keep receiving all this waste material. That's just my opinion.
- No. I think I have hit it real hard over the field. I would like v very much to be included in all the information. I believe in having the information before making the opinion. I think we can still work together and get this figured out. It has to be about the river, not about people and positions. Working in the corporate world for a third of my life I feel I am seeing some of it, power struggle, as there are changes within DEQ and EPA. The river keeps flowing and the problem keeps going. And my bank keeps eroding and I was told to leave it alone and have lost fence. There needs to be some seeing. Brian having lunch with some of the crew and being visible, that is great; we just need more of it.
- Clark Fork River site seems like it's progressing well. Good to see work on the ground, instant change and that is very nice.
- I think this whole process of remediation is such an opportunity. Needs to think of it as healing and need to face the fact that it is a good process.

Appendix C – Copies of River Review Fact Sheets

**Clark Fork River
Operable Unit of the
Milltown Reservoir
Clark Fork River
Superfund Site**

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Cleanup Update

June 2009

Remediation and Restoration Developments

Remedial/Restoration Design Work Plan

The Montana Department of Environmental Quality (DEQ) and Department of Justice Natural Resource Damage Program (NRDP), in cooperation with the U.S. Environmental Protection Agency (EPA) and National Parks Service (NPS) for cleanup activities at the Grant-Kohrs Ranch, are designing the remediation and restoration work to be done along 43 miles of the Clark Fork River (CFR) from Warm Springs in Anaconda/Deer Lodge County downstream to Garrison in Powell County. Cleanup will start in late 2009 or early 2010 and is expected to take 10-12 years.

Consent Decree and Settlement Money

In 2008, 25 years after the state sued the Atlantic Richfield Co. (ARCO) for natural resource damages (NRD) in the Upper Clark Fork River Basin, a final settlement was reached and the judge signed the CFR consent decree. The state received \$123 million from ARCO for remediation and restoration of mining pollution in the Clark Fork River Operable Unit. (The state received a total of about \$400 million in the settlements involving this NRD lawsuit.)

Deer Lodge Trestle Sampling and Public Meeting

In the fall of 2008, Powell County residents and others interested parties attended a public meet-



Soil sampling at the Deer Lodge Trestle area,
October 2008

ing coordinated by the Clark Fork River Technical Advisory Council (CFRTAC). DEQ project officers discussed soil sampling taking place in the trestle area. Sampling results showed that, in general, surface contamination is below acceptable levels but there were areas that had high levels of contamination at depth. The DEQ is currently determining an appropriate design for this area and is coordinating the design with Powell County's future plans for a trail system. DEQ expects construction to begin in summer 2010.

Upcoming 2009 Activities

East Side Road Sampling

The DEQ is meeting with East Side Road property owners, surveying vegetation and identifying properties to be included in further investigation. The agency requests information from property owners of areas where things won't grow or changes in land use, which could require sampling and/or cleanup activities. The DEQ greatly appreciates landowners granting access for sampling and their cooperation during this process. East Side Road properties include residential and agricultural lands that extend from Sager Lane to the city limits of Deer Lodge and encompass the area

between the East Side Ditch and historic floodplain.

Remedial River Sampling and Remedial Action

The DEQ plans to sample 3.7 miles of river just downstream of Warm Spring Ponds. Tailings, soils and stream banks will be tested. The DEQ plans to perform sampling in late summer, complete the design in early 2010 and implement construction in summer 2010. This construction will also include implementation of the NRDP restoration plan for this area. The public will be offered a tour by the DEQ to find out what to expect from the river sampling.

Public Meeting

Join CFRTAC, the DEQ, NRDP, EPA and others for a public meeting, at 6 p.m. on Tuesday, June 23rd at the Deer Lodge Community Center. Bring your questions and concerns.

Agency Coordination

With the DEQ as the lead agency under the consent decree, the DEQ and NRDP are coordinating in the remediation and restoration of the Clark Fork River Operable Unit. The EPA and NPS have oversight roles and CFRTAC is giving input, technical assistance and working with community involvement.



Upcoming 2009 Activities— (Continued from page one)



Cross-section surveying of the Clark Fork River at the Deer Lodge Trestle to prepare for remediation.

Deer Lodge Residential Sampling

Residential yards within the historical floodplain or historically irrigated from the river have the potential to pose a risk to human health. The DEQ plans to sample yards in Deer Lodge this summer. If unacceptable levels of contamination exist, the DEQ will remediate these yards in summer 2010 (if necessary).

Access Agreements

The DEQ is requesting property owners to sign access agreements to allow the agency on the property to conduct sampling and cleanup. A cover letter will explain the work contemplated. These access agreements are concise, easy to understand documents. Landowner cooperation for sampling and cleanup is appreciated.

Attention Contractors

To be considered during an invitation for bid, a contractor must meet several criteria, including but not limited to, being bonded and insured, a registered contractor with the State of Montana and trained (40 hours) in emergency hazardous waste operations (HAZWOPER). The DEQ will develop designs for various stages of the work. When the design is complete, the construction project will be put out for bid on the DEQ website at www.deq.mt.gov. Typically, the bid is open for 30 to 60 days. The DEQ will respond to questions and hold a pre-bid conference. Bids are sealed and opened at once in public. The DEQ selects the lowest responsive and responsible bidder.



Public meeting in Deer Lodge, October 2008

**Coming soon!
DEQ's new
Clark Fork River
Operable Unit website at
www.deq.mt.gov**

Site History

The Clark Fork River Operable Unit (CFR OU) is part of the Milltown Reservoir/Clark Fork River Superfund Site. The CFR OU includes the Clark Fork River from its headwaters near Warm Springs Creek to Milltown Reservoir, just east of Missoula. The heavy metals (Cadmium, Copper, Zinc, and Lead) and arsenic in the Clark Fork River are from historic mining, milling and smelting processes linked to the Anaconda Company operations in Butte and Anaconda.

The majority of the cleanup will occur along a 43 mile stretch of the river from Warm Springs in Anaconda/Deer Lodge County downstream to

Garrison in Powell County. This is known as "Reach A." The primary sources of contamination are tailings mixed with soil in the stream banks and historic floodplain. These sources threaten human health and animal and plant life.

The 2004 Record of Decision describes the cleanup approach, or Selected Remedy. In addition to the ROD, the NRDP developed a Restoration Plan to expedite the recovery time for injured aquatic and terrestrial resources in and along the Clark Fork River. To the extent practicable, the Restoration Plan will be combined with the Remedy to maximize the use of resources.

**Clark Fork River
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Cleanup Update

December 2010

Remediation and Restoration Developments

Fall 2010 Residential Yard Removals

Soil sampling in fall 2009 identified residential yards along the Clark Fork River in Deer Lodge and on Eastside Road in Powell County with elevated levels of arsenic and/or lead. The Montana Department of Environmental Quality removed approximately 5,000 cubic yards of contaminated soil from six of the yards this past fall. The project started in mid-October 2010 and was completed in about two months. The top 6 to 24 inches of yard soil was excavated. The yards were replaced with clean soil and revegetated. DEQ plans to remove contaminated soil from the remaining dozen or so yards in spring 2011.



Removing contaminated soil from residential yard, fall 2010

River Work

Although we haven't yet started cleanup activities along the Clark Fork River, we've been sampling at multiple locations along the river, including below Warm Springs and at Galen Road. Sampling started in fall 2009 and continued in fall 2010. We plan to sample downstream from Deer Lodge in fall 2011. Sampling is important work for developing the site-specific designs to clean up each section of the river, as well as the long-term plan for the entire river. Long-term planning helps ensure that remediation and restoration funding is used cost effectively.



Same yard as above photo with clean soil, sod and replaced trees, fall 2010

Tributary and Terrestrial Prioritization Plans

The Montana Department of Justice Natural Resource Damage Program and Fish, Wildlife and Parks have been working to prioritize resource areas in the Upper Clark Fork River Basin and target these areas for use of some of the Restoration Funds that were obtained in the 1999 partial settlement of the state's natural resource damage lawsuit. This process has produced two documents, the Prioritization of Tributaries in the Upper Clark Fork River Basin for Fishery Enhancement, Draft Final and the Upper Clark Fork River Basin Terrestrial Wildlife Resource Prioritization, Draft Final, which have been the subject of numerous public meetings over the past few months. The 60-day public comment period closed on November 30, 2010. The agencies are reviewing comments and beginning to finalize the plans. Most folks agree that prioritization of resources is needed to determine where best to spend available funds. More information about the state's prioritization efforts is available from the NRDP website at: <http://doj.mt.gov/lands/naturalresource/restorationroadmap.asp>

Remediation and Restoration Developments—Continued

Additional Fishery Studies

Also, FWP, NRDP and Montana State University are continuing to study fish movement in the Clark Fork River and Silver Bow Creek to better understand the full life cycle of the fish, such as, identifying spawning areas and areas of winter refuge, which will assist in decisions on how best to accomplish fishery restoration activities in the basin.

Attention Contractors

To be considered during an invitation for bid, a contractor must meet several criteria, including but not limited to, being bonded and insured, a registered contractor with the State of Montana, and trained (40 hours) in emergency hazardous waste operations (HAZWOPER). The DEQ will develop designs for various stages of the work. When a design is complete, the construction project will be put out for bid on the DEQ website at www.deq.mt.gov. Typically, the bid is open for 30 to 60 days. The DEQ will respond to questions and hold a pre-bid conference. The sealed bids are opened together in public. The DEQ selects the lowest responsive and responsible bid.

Design Review Team

DEQ convened the first meeting of the Design Review Team in June 2010 to talk about the Trestle Area design. The meeting took place at the Penn Convention Center in Deer Lodge. The DRT provides technical advice for the Upper Clark Fork River Superfund cleanup. The meetings are an important step in the design process and are open to the public. The DRT reviews designs for technical adequacy, coordinates designs among agencies and informs the public and interested parties about design details. The DRT is comprised of a diverse group of stakeholders, including state and federal agencies, local governments and technical assistance groups. Stay tuned for notice of upcoming DRT meetings.



Design Review Team meeting, June 10, 2010, at Penn Convention Center

Upcoming 2011 Activities

Deer Lodge Trestle Area

Excavation of contaminated soil, along with stream bank reconstruction and revegetation, is expected to get underway at the Deer Lodge Trestle Area after high water in 2011 subsides. This excavation will complement efforts by Powell County to clean up portions of the former Old Milwaukee Roundhouse facility.

Pastures

We are currently working on a plan to remediate large areas of pasture lands adjacent to contaminated residential areas (yards) discussed above, that were contaminated by historic flood irrigation from the Eastside ditch. These areas were sampled in spring 2010. Remediation will establish self-sustaining vegetation and reduce blowing dust and is tentatively set for spring 2011.

The Upper Clark Fork River Federal Superfund Operable Unit is the \$123 million, 43-mile remediation and restoration project to clean up arsenic and heavy metals mine waste contamination from Warm Springs in Anaconda/Deer Lodge County downstream to Garrison in Powell County. The Montana Department of Environmental Quality (DEQ) and Department of Justice Natural Resource Damage Program (NRDP), in cooperation with the U.S. Environmental Protection Agency (EPA) and National Parks Service (NPS) for cleanup activities at the Grant-Kohrs Ranch, are designing and performing the remediation and restoration work. Cleanup started in 2010 and is expected to take 10-12 years



Clark Fork River with contamination in background



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Montana DEQ
Remediation Division
P.O. Box 200901
Helena, MT 59620-0901



Cleanup Update

October 2011

Remediation and Restoration Developments

Residential Yard Removals

Soil sampling in fall 2009 identified residential yards along the Clark Fork River in Deer Lodge and on Eastside Road in Powell County with elevated levels of arsenic and/or lead. The Montana Department of Environmental Quality (DEQ) removed approximately 13,000 cubic yards of contaminated soil from 15 properties in fall 2010 and spring and summer 2011. The top 6 to 24 inches of yard soil was excavated. The yards were replaced with clean soil and revegetated. DEQ would like to thank the landowners, citizens of Powell County, the City of Deer Lodge and Powell County for their patience and cooperation during this project.



Same yard as below with clean soil, sod, willow cuttings and replaced trees, summer 2011

Public safety is our number one concern and we appreciate public support of this project.



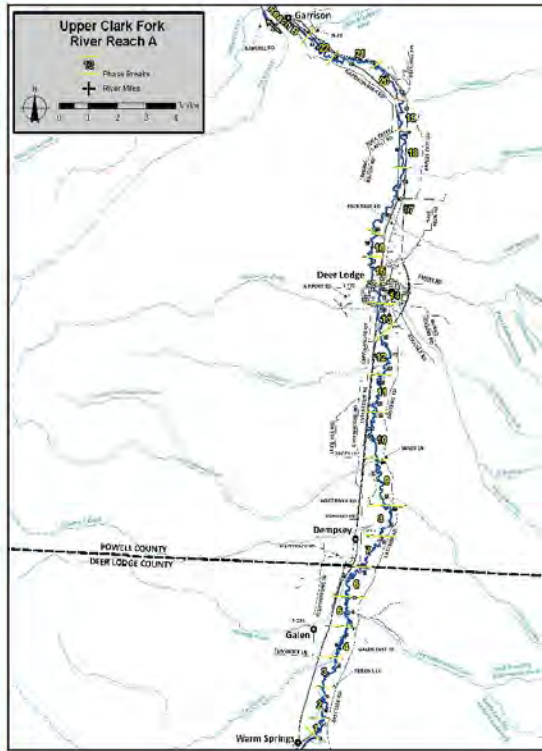
Removing contaminated soil from residential yard and rebuilding stream banks, summer 2011

Next—The Trestle (Also known as Bum Bridge)

Cleanup at the Trestle Area located in Deer Lodge is scheduled to begin in mid-October. The cleanup includes removing approximately 10,000 cubic yards of contaminated soils with higher than acceptable residential levels of arsenic (150 mg/kg). The contaminated soils will be replaced with clean soil. In addition, approximately 1,000 feet of stream bank will be reconstructed and revegetated. This cleanup is being coordinated with Powell County's future land use planning for this area and with EPA cleanup at the adjacent Milwaukee Roundhouse Site.

Please Note: It will be necessary to limit pedestrian access to this site during construction and until the vegetation becomes established. Floater access on the river may be limited during construction. We appreciate your understanding.





Remedial Design Sampling

DEQ has divided the Reach A of the Clark Fork River into "Phases." (See map). These Phases allow DEQ to develop site specific cleanup designs for various sections of river. As of the end of 2011, DEQ will have completed design level sampling of Phases 1, 2, 5, 6, 7, 15 & 16 where access was granted. This allows for long term project planning.

Reach A, Phase 1 Design

DEQ is currently developing a Preliminary Design Plan (PDP) for the uppermost section of the Clark Fork River Operable Unit (Phase 1), which is near Warm Springs. DEQ will host a Design Review Team meeting in early 2012 to discuss the design.

Attention Contractors

To be considered for bid, a contractor must meet several criteria, including but not limited to, being bonded and insured, a registered contractor with the State of Montana, and trained (40 hours) in emergency hazardous waste operations (HAZWOPER). The DEQ will develop designs for various stages of the work. When a design is complete, the construction project will be put out for bid on the DEQ website at www.deq.mt.gov. Typically, the bid is open for 30 to 60 days. The DEQ will respond to questions and hold a pre-bid conference. The sealed bids are opened in public. The DEQ selects the lowest responsive and responsible bid.

Upcoming 2012 Activities

Pastures

We are currently working on a plan to remediate large areas of pasture lands adjacent to the residential yards discussed on page 1. The pasture lands were contaminated by historic flood irrigation from the Eastside ditch. These areas were sampled in spring 2010. Remediation will establish self-sustaining vegetation and reduce blowing dust. It is tentatively set to take place in spring 2012.

The Clark Fork River Operable Unit (CFR OU) is part of the Milltown Reservoir/Clark Fork River Superfund Site. The CFR OU includes the Clark Fork River from its headwaters near Warm Springs Creek to Milltown Reservoir, just east of Missoula. The heavy metals (Cadmium, Copper, Zinc, and Lead) and arsenic in the Clark Fork River are from historic mining, milling and smelting processes linked to the Anaconda Company operations in Butte and Anaconda.

The majority of the cleanup will occur along a 43 mile stretch of the river from Warm Springs in Anaconda/Deer Lodge County downstream to Garrison in Powell County. This is known as "Reach A." The primary sources of contamination are tailings mixed with soil in the stream banks and historic floodplain. These sources threaten human health and animal and plant life.



Clark Fork River with contamination in background



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Appendix D - Contacts and Locations

Media Contacts

Title	Address	Phone # (406)	Email
Anaconda/Deer Lodge County (all are Anaconda, MT 59711)			
Anaconda Leader	121 Main St.	563-5283	leaderadv@anacondaleader.com
KGLM-FM Radio	105 Main St.	563-3247	NA
Powell County (all are Deer Lodge, MT 59722)			
Silver State Post, Patrick Duggan	312 Missouri Ave. PO Box 111	846-2424	ads@sspmt.com
River Ranch Radio KQRV and KBCK, Bob Toole	302 Missouri Ave.	846-1100	riverradio@bresnan.net

Agency Contacts

Title	Name	Address	Phone # (406)	email
	Director, Richard Opper	1520 East Sixth Avenue P.O. Box 200901, Helena, MT 59620	444-2544	ropper@mt.gov
	Remediation Division Administrator, Jenny Chambers		841-5001	ichambers@mt.gov
Montana Department of Environmental Quality	Federal Superfund Section Chief, Larry Scusa		841-5035	lscusa@mt.gov
	Project Officer, Brian Bartkowiak	1100 North Last Chance Gulch PO Box 200901 Helena, MT 59620-0901	841-5043	bbartkowiak@mt.gov
	Public Information Officer, Jeni Garcin		841-5016	jgarcin2@mt.gov
	Counsel, Brad Smith		841-5023	brads@mt.gov
Montana Department of Justice, Natural Resource Damage Program	Supervising Asst. Attorney General Robert Collins	1301 East Lockey P.O. Box 201525, Helena, MT 59620	444-0226	rcollins@mt.gov
	Environmental Science Specialist, Tom Mostad		444-0227	tmostad2@mt.gov
U.S. Environmental Protection Agency	Director MT Office, Julie DalSoglio		457-5000	Dalsoglio.julie@epa.gov
	Superfund Chief, Joe Vranka	Federal Building 10 W. 15 th Street, Suite 3200, Helena, MT 59626	457-5039	Vranka.joe@epa.gov
	Remedial Project Mgr, Roger Hoogerheide		457-5031	Hoogerheide.roger@epa.gov

Federal Elected Official Contacts

Title	Name	Address	Phone # (406) unless noted	email
Senator	Max Baucus	511 Hart Senate Office Bldg Washington, D.C. 20510	(202) 224-2651	max@baucus.senate.gov
	Jillian Morgan	30 West 14th Street Suite 206 Helena, MT 59601	449-5480	jillian_morgan@baucus.senate.gov
	Kim Krueger	125 West Granite Suite 100 Butte, MT 59701	782-8700	kim_krueger@baucus.senate.gov
Senator	Jon Tester	204 Russell Senate Office Bldg Washington, DC 20510-2604	(202) 224-2644	rjt@tester.senate.gov
		208 N Montana Avenue, Suite 202, Helena, MT 59601	449-5401	
	Pamela Haxby-Cote	125 West Granite Suite 200 Butte, MT 59701	723-3277	pamela_haxby-cote@tester.senate.gov
Congressman	Steve Daines	No contact information yet		

State Elected Official Contacts

Title	Name	Address	Phone # (406)	email
Governor	Steve Bullock	No contact information yet		
Lieutenant Governor	John Walsh	No contact information yet		
House District 84	Mike Miller (R)	20906 MT Hwy 141, Helmville, MT 59843	793-5860	Mike4hd84@blackfoot.net
House District 85	Gordon Pierson (D)	603 Washington, Deer Lodge, MT 59722	846-3335	bigdogarmwrestling@yahoo.com
Senate District 42	Dave Lewis (R)	5871 Collins Road, Helena, MT 59620	459-9751	DaveLewis@aol.com
Senate District 43	Gene Vuckovich (D)	1205 W. 3 rd Street, Anaconda, MT 59711	563-2313	Mt.sd43@gmail.com

County Government Contacts

Title	Name	Address	Phone # (406)	email
Deer Lodge/Powell County (all are Deer Lodge, MT 59722)				
Mayor of Deer Lodge	Mary Ann Fraley	300 Main Street	846-1226	NA
Clerk & Recorder	Diane S. Grey	409 Missouri Ave., #203	846-9786	cr@co.powell.mt.us
Clerk of District Court	Joan Burke	409 Missouri Ave., Suite 302	846-9787	NA
Commissioner (District 1)	Cele Pohle	409 Missouri Ave., Suite 202	846-9788	cpohle@co.powell.mt
Commissioner (District 2)	Rem Mannix	409 Missouri Ave., Suite 202	846-9788	
Commissioner (District 3)	Donna Young	409 Missouri Ave., Suite 202	846-9788	donnayoung@blackfoot.net
Disaster & Emergency Ser.	Bart Barton	409 Missouri Ave., #111	846-9718	des@co.powell.mt.us
Law Enforcement	Scott F. Howard, Sheriff	313 Fourth St.	846-2711	scotth@pcso.co.powell.mt.
Planner	Brian P. Bender, AICP	409 Missouri Ave., #101	846-9795	bbender@co.powell.mt.us
Public Health		409 Missouri Ave., #114	846-9796	NA
Sanitarian (tri-county)	Chad Lanes, R.S.	409 Missouri Ave., #103	846-9710	NA
Weed	Karen Laitala	409 Missouri Ave., #105D	846-3348	powellweed@bresnan.net
Anaconda/Deer Lodge County (all are Anaconda, MT 59711)				
Chief Executive	Connie Daniels	800 South Main	563-4000	Note: Individual email addresses are not available for ADLC. Emails can be sent through the contact page at the ADLC website.
Clerk of Commission	Sandra Wenger	800 South Main	563-4002	
Commissioner (District 1)	Terry Vermeire	800 South Main	563-	
Commissioner (District 2)	Patricia Mulvey	800 South Main	563-4000	
Commissioner (District 3)	Kevin Hart	800 South Main	563-4000	
Commissioner (District 4)	Robert Pierce	800 South Main	797-3346	www.anacondadeerlodge.mt.gov/
Commissioner (District 5)	Elaine Lux-Burt	800 South Main	563-3766	
Disaster & Emergency Ser.	William M. Converse	800 South Main	563-5571	
Health Nurse	Barb Berry	307 E. Park	563-7863	
Law Enforcement	Tim Barkell, Chief	800 Oak Street	563-5241	
Interim Planner	Doug Clark	800 South Main	563-4010	
Public Health Department	Linda Best	115 W. Commercial Ave.	563-7863	
Sanitarian	Chad Lanes, R.S.	800 South Main	563-4066	
Weed	Sharon Scognamiglio	800 South Main	563-4055	

Local Clubs and Groups

Organization	Address	Phone Number (406)
Anaconda/Deer Lodge County (all are Anaconda, MT 59711)		
American Legion	617 E Third	563-6071
Anaconda Garden Club (www.mtfgc.org)	804 W 3rd St	563-3857
Anaconda Sportsmans Club	2 Cherry	
Anaconda Saddle Club (anacondasaddleclub.org)	3160 Montana Highway 1 West	563-3323
Elks Lodge	223 Main St.	563-3251
Kiwanis	105 Howe St.	563-7523
Smelter City Senior Center	115 Pennsylvania Ave	
Rotary	1202 Elaine Drive	560-6172
Toastmasters	2013 Haggin Ave	
Powell County (all are Deer Lodge, MT 59722)		
4-H, MSU Extension	409 Missouri Ave., Suite 102	846-9791
Benevolent & Protective Order of Elks	PO Box 777	846-1737
Deer Lodge Woman's Club	800 Missouri Ave	846-7609
International Association of Lions Clubs	413 5th St	846-1110
Ancient Free & Accepted Masons	304 Milwaukee Ave	846-2682
Powell County Senior Citizens Inc	100 Missouri Ave.	846-3939
Watershed Restoration Coalition of the Upper Clark Fork	1002 Hollenbeck Road	846-1703

Note: email addresses are not available for these organizations.

School Contact Information

Title	Address	Phone Number (406)
Anaconda/Deer Lodge County (all are Anaconda, MT 59711)		
Anaconda School District #10	400 Main St.	563-6361
Lincoln Elementary School	506 Chestnut	563-6141
W.K. Dwyer Elementary School	1601 Tammany Ave.	563-7365
Fred Moodry Middle School	219 East Third St.	563-6242
Anaconda High School	400 Main St.	563-5269
Powell County (all are Deer Lodge, MT 59722)		
School District #1	444 Montana Ave.	846-1553
Granville Stuart Elementary	444 Montana Ave.	846-1622
O.D. Speer Elementary School	444 Montana Ave.	846-2268
Duvall Junior High School	444 Montana Ave.	846-1685
Powell County High School	709 Missouri Ave.	846-2757

Note: email addresses are not available for schools.

Meeting Places

Title	Address	Phone Number (406)
Anaconda/Deer Lodge County (all are Anaconda, MT 59711)		
Elks Lodge	223 Main St.	563-3251
Powell County (all are Deer Lodge, MT 59722)		
Pen Convention Center	925 Main St.	846-3111
Community Center	416 Cottonwood ave	846-9723
St. Mary's Center	607 Clark Street	846-3044
Central Park Center	444 Montana Ave.	846-1553
Deer Lodge Elks 1737	230 Main St.	846-9596
Broken Arrow Function Room	317 Main St.	846-3400
Race Track Volunteer Fire Department Fire Hall	6959 S Frontage Rd	846-2852

Note: email addresses are not available for these organizations.

Administrative Record and Information Repository Locations

Title	Address	Phone Number (406)
Administrative Record (State of Montana)	DEQ Remediation Division, 1100 North Last Chance Gulch, PO Box 200901, Helena, MT 59620	841-5000
Administrative Record (U.S. EPA)	EPA Montana Operations Office Federal Building 10 West 15th Street, Suite 3200 Helena, MT 59626	457-5000 or 866-457- 2690 (toll free)
	Hearst Free Library 4th and Main Street, Anaconda, MT 59711	563-6932
	EPA Butte Office 155 West Granite, Butte, MT 59701	782-3838
Information Repository (maintained by EPA)	Montana Tech 1300 West Park, Butte, MT 59701	496-4281
	Grant-Kohrs Ranch National Hist. Site 210 Missouri Ave., Deer Lodge, MT 59722	846-2070
	Powell County Planning Office 409 Missouri Street, Deer Lodge, MT 59722	846-3680

Appendix E - Site History and Site Risks

The CFROU is part of the Milltown Reservoir/Clark Fork River Superfund Site. It includes the Clark Fork River from its headwaters near Warm Springs Creek to Milltown Reservoir, just east of Missoula. (See Exhibit 1). The CFROU is defined as “surface water, bed sediments, tailings, impacted soils, ground water, aquatic resources, terrestrial resources, irrigation ditches and related tailings deposits, and air located within and adjacent to the historic 100-year floodplain of the Clark Fork River” (EPA, 2004a). The heavy metals (cadmium, copper, lead, and zinc) and arsenic in the Clark Fork River are from historic mining, milling and smelting processes linked to the Anaconda Company’s operations in Butte and Anaconda. The majority of the cleanup will occur in Reach A, with limited cleanup in Reach B. No remedial action is proposed for Reach C due to the limited amount of waste in this Reach.

The primary sources of contamination in the CFROU are tailings mixed with soil in the streambanks and the historic floodplain. These sources provide pathways to plant and animal life, and to humans who come in contact with the soils. Contaminants move from tailings and impacted soils through the process of erosion directly into the river and other surface waters. This movement provides pathways to terrestrial and aquatic life. In addition to erosion of tailings and impacted soils, metals are leached directly from the tailings into groundwater and surface water.

In addition to remedial requirements set forth in the ROD, the State of Montana and the Department of Interior both developed a restoration plan for the CFROU in order to expedite the recovery time for injured aquatic and terrestrial resources in and along the river. To the extent practicable, the restoration plan will be combined with and build upon the remedy that EPA has selected. Through their cooperation on this combined remedy/restoration action, the cooperating agencies expect to maximize the use of resources available for and the environmental benefits to the site. An overview of the remediation and restoration components is provided in Section 3 of this CIP.

E.1 Public Health Exposure

In 1998, EPA conducted the Baseline Human Health Risk Assessment (HHRA) for the CFROU (Weston 1998). The main findings of the HHRA are as follows:

1. The principal chemical of potential human health concern in tailings located along the Clark Fork River is arsenic. Arsenic can cause both cancer and noncancer effects in humans if exposure levels are high enough. Other mining-related chemicals appear to pose no substantial human health hazard at the levels found in the CFROU.
2. For people who have only intermittent or occasional contact with tailings (e.g., recreational visitors who hike along the river, swimmers who raft down the river, hunters or fisherman along the river), arsenic levels in tailing and contaminated soil do not result in cancer or noncancer health risks that exceed the normally acceptable risk range. If people were to live in areas where they have repeated (daily) contact with tailings, especially in Reach A (where tailings deposits are most concentrated), risk from arsenic could be in a range of concern for both noncancer effects and for cancer effects.
3. Fields or pastures that were historically flooded or irrigated with river water during times that the river “ran red” do not appear to pose a risk to ranchers or farmers, but might be

above the normal range of concern for residents if homes are built directly in areas of high impact.

4. Arsenic levels in most groundwater wells are below the customary levels of concern, especially those wells that are currently used for drinking. Highest arsenic levels are observed in monitoring wells that are less than 25 feet in depth.
5. Arsenic levels in locally raised beef, fish from the Clark Fork River, and in waterfowl from the Warm Springs Ponds, appear to be within the normally acceptable risk range. No data are available on arsenic levels in local produce.
6. Arsenic levels in the surface water of the Clark Fork River do not pose human health risks outside the normally acceptable risk range to people who wade or swim in the river.
7. Direct biomonitoring of arsenic levels in urine and hair of area residents supports the conclusion that arsenic exposure levels are within normal bounds.

Based on these findings, the HHRA concluded that current risks to humans from chemical contaminants in tailing deposits along the river are mainly or entirely within the normal acceptable range. This is not because the tailings are without the potential to cause adverse effects, but because current exposures in Reach A are sufficiently low that unacceptable risks are not likely to occur. Risks could be in a range of concern if permanent residences were established in Reach A. In addition, there may be risks that reach a level of potential concern in areas where residences have been built on lands that have been substantially impacted by historic irrigation with contaminated water.

E.2 Ecological Risks

The ecological risk assessment (ERA) established clear risks to the terrestrial environment along Reach A of the CFROU. Limited risks were identified for Reaches B and C. The ERA concluded that there is ample evidence that both the aquatic and the terrestrial environments within the Clark Fork River are contaminated by mining-related wastes, that living organisms within both ecosystems have elevated exposure to mining-related metals, and that the metals do cause adverse effects on at least some receptors in each ecosystem. Specific conclusions regarding the impact of these elevated exposures are summarized below.

For the aquatic ecosystem:

- Algae appear to be minimally impacted, with no detectable metals-related loss of diversity or abundance.
- There is a decrease in taxa richness and in the abundance of some sensitive species of benthic macroinvertebrates in upstream locations, and this is probably due in part to metals.
- The density of trout in the Clark Fork River is lower than in reference streams, and metals are judged to be a contributor to this effect. The metals-related exposure pathway contributing to this decrease in population is not certain, but is more likely related to acutely lethal pulse events than to ambient levels of metals in surface water or the diet.

For the terrestrial ecosystem:

- There is clear evidence of phytotoxicity to terrestrial plant species in tailings impacted areas, especially in slickens areas. Some other (non-slickens) areas are also impacted, as reflected in decreased plant diversity and abundance.
- There is good evidence that soil organisms (worms, microbes) are adversely impacted by soils from slickens areas. Effects of metals on soil organisms are also predicted in some other (non-slickens) areas, but direct evidence to support this prediction is not available.
- The hazard to some terrestrial animals is predicted to be quite high. However, direct observations to support this prediction are lacking, so the actual level of risk to terrestrial receptors from metal exposures is subject to uncertainty.

E.3 Government Agency Involvement

This project is funded through a settlement between ARCO, EPA, and the State of Montana. DEQ is the lead agency for the response actions within the OU, with oversight provided by the EPA.

