

# Abandoned Uranium Mines Working Group Communications Strategy

December 30, 2024

## Purpose

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

## Introduction

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

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

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

AUMWG recognizes the importance of stakeholders' meaningful participation and will enhance engagement with stakeholders to ensure Defense-Related Uranium Mines (DRUM) program and abandoned mine lands (AML) activities are transparent. The approach outlined herein is designed to be dynamic and adaptable and will evolve based on implementation results and ongoing input from stakeholders and AUMWG.

AUMWG, through its member agencies, will build stronger strategic partnerships with stakeholders to implement its recommendations for addressing the legacy of AUMs.

## **Background**

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

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

### ***U.S. Department of Energy***

The U.S. Department of Energy (DOE) Office of Legacy Management established the DRUM program after the *Defense-Related Uranium Mines Report to Congress* (also called the Report to Congress) was completed in August 2014. The DRUM program is a partnership between DOE, federal land management agencies, and state AML programs to verify and validate the condition of DRUM sites on public, private, and Tribal land.

DOE will complete DRUM program Campaign 1, which involves inventorying and assessing mines on public land, by Dec. 31, 2024. This is an updated completion date, necessitated by the Navajo Abandoned Mine Lands Reclamation Department's July 2023 request to double the rate of field work on the Navajo Nation.

With interagency collaboration, DOE initiated DRUM program Campaign 2, which involves inventorying and assessing mines on Tribal land in fiscal year (FY) 2022 and will continue the campaign until Sept. 30, 2027.

In spring 2024, DOE initiated DRUM program Campaign 3, which involves inventorying and assessing mines on private property.

In FY 2021, DOE started working with partner land management agencies on safeguarding physical hazards that represent an immediate threat to human health and safety. DOE plans to continue work to remedy physical hazards that represent an immediate threat to human health and safety through the end of FY 2030.

### ***U.S. Environmental Protection Agency***

The U.S. Environmental Protection Agency (EPA) is continuing efforts to assess and clean up abandoned mines on the Navajo Nation and in New Mexico. Through a combination of enforcement agreements and settlements, the EPA has secured about \$1.7 billion in potentially responsible party (PRP) work commitments and special account funds to investigate and remediate more than 200 abandoned uranium mines on the Navajo Nation. A major EPA focus

will be overseeing potentially responsible party investigations and response actions in the San Mateo Creek Basin within the Grants Mining District in New Mexico.

In March 2024, EPA added the Lukachukai Mountains Mining District in northeastern Arizona to the National Priorities List, which is the first Superfund site on the Navajo Nation. Conducting the remedial site investigation, which has 88 AUMs, will be a central focus in the coming years. EPA will also coordinate closely with the Navajo Nation on selecting and implementing cleanup options for several large mine sites in the eastern AUM region of the Navajo Nation as well as overseeing the four-year cleanup of the Northeast Church Rock Mine site beginning in 2025. EPA will continue collaborating with DOE's DRUM program and the Navajo Nation Abandoned Mine Lands Program to assess AUMs on the Navajo Nation that are not funded under existing settlements and evaluate next steps for these AUMs based on human health and ecological risks.

### ***U.S. Bureau of Land Management***

The U.S. Bureau of Land Management (BLM) will continue its current response actions at DRUM sites. BLM currently leverages program funding, existing agreements, and available federal funding with states to continue state-by-state inventories, risk assessments, response actions, and resource sharing. The BLM National Office, National Operations Center, and various state offices work with state governments and DOE to join expertise and identify appropriate processes and methods for addressing these mines.

### ***U.S. Forest Service***

The U.S. Forest Service (USFS) will continue assessing and cleaning up AUM sites to a degree commensurate with annual funding and in considering other priority projects. USFS is currently partnering with EPA Region 6 on implementing the *Assessment of Health and Environmental Impacts of Uranium Mining and Milling, Five-Year Plan Grants Mining District, New Mexico*. USFS is also partnering with other EPA regions as well as states and DOE to leverage agency resources and collectively address AUMs on USFS-managed land.

### ***U.S. Bureau of Indian Affairs***

As a trustee for all Tribal mine sites, The U.S. Bureau of Indian Affairs (BIA) will participate in community outreach efforts, ensuring Tribes are formally and informally informed and consulted. BIA will monitor the ongoing work at Tribal mine sites and provide long-term monitoring of institutional controls and completed remedies applied to Tribal lands. BIA will assist EPA, other agencies, and PRPs with access to trust lands and allotments for assessment and cleanup purposes.

## ***National Park Service***

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

After successful completion of verification and validation activities at the DRUM sites within NPS units (Canyonlands National Park in Utah, Capitol Reef National Park in Utah, Glen Canyon National Recreation Area in Arizona and Utah, Bighorn Canyon National Recreation Area in Montana and Wyoming, and Petrified Forest National Park in Arizona). NPS is currently working with Bat Conservation International, known as BCI, to conduct wildlife surveys at mine sites that risk roll-up reports identified as requiring safeguarding. After completing these surveys, NPS will complete site-specific compliance (National Environmental Policy Act [NEPA]/National Historic Preservation Act [NHPA]/Endangered Species Act [ESA]) before closure work is scheduled to begin (FY 2025).

## **Strategy**

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

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

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

- **States:** There are several abandoned mine sites on state-managed land. The AUMWG representative, when appropriate, will work with various state divisions, departments, bureaus, and programs (such as AML, environmental, and public health programs) to perform AUM activities. Maintaining strong working relationships with states during AUM activities is crucial to meeting the working group's shared objectives.
- **Tribal governments:** Many abandoned mine sites are on or could potentially impact Tribal lands. The AUMWG representative, when appropriate, will work with Tribal governments and programs (such as the Navajo Abandoned Mine Lands Reclamation Department and the Navajo Nation Environmental Protection Agency) to develop a regular engagement process while implementing AUM activities. The essential reason for Tribal consultation is identifying the cultural values, religious beliefs, traditional practices, and legal rights of Native nation people that AUM activities could affect. Engaging Tribal governments has four essential elements:

1. Identifying appropriate Tribal governing bodies and individuals from whom to seek input.
  2. Consulting with appropriate Tribal officials or individuals and asking for their views about land-use proposals or other pending AUM actions that might affect traditional Tribal activities, practices, or beliefs relating to particular locations.
  3. Treating Tribal information as a necessary factor in defining the range of acceptable land management options.
  4. Creating and maintaining a permanent record to show how Tribal information was obtained and used in the decision-making process.
- **Local governments and regional authorities:** Local governments and regional authorities may be involved in the acquisition, reclamation, and remediation of abandoned mines. The AUMWG representative, when appropriate, will conduct outreach with local governments and regional authorities to get their input on implementing AUM activities.
  - **Environmental and community-based organizations:** The potential environmental and community concerns about abandoned mines are important to understand and address during the implementation of AUM activities. The abandoned mine sites may be connected with complex environmental, technical, political, and economic issues, potentially related to their often-remote locations, the magnitude and scale of their contamination, and their occasional location partially on public land and partially on private property. Complying with appropriate environmental regulations is a top priority. Meaningful community participation is critical in addressing these challenges. Community involvement activities ensure all stakeholders are informed about site reclamation and cleanup activities and can influence mine cleanup and reuse decisions. The AUMWG representative, when appropriate, will conduct the following engagements:
    1. Engage environmental and community-based organizations in dialogue about site reclamation and cleanup.
    2. Support engaging communities to establish goals for site reuse and redevelopment.
    3. Develop and maintain a database of key contacts in communities working to reclaim, clean up, and redevelop sites.
    4. Provide public notice of National Environmental Policy Act- and Superfund-related hearings and public meetings and of the availability of environmental documents that can inform those persons and agencies who may be interested or affected.
  - **Industry, contractors, and potentially responsible parties:** Industry, contractors, and PRPs all play critical roles in implementing AUM activities. The AUMWG representative, when appropriate, will engage this stakeholder group to facilitate abandoned mine sites reclamation and cleanup. It is important to support these parties in their efforts to help AUMWG reclaim and clean up sites.

The working group's industry partners are often the best source of information, so productively engaging with industry partners is necessary so the working group clearly

understands the marketplace, develops well-thought-out acquisition strategies, and uses technological advances. Early, frequent, and constructive engagement with industry partners is especially important for AUM activities.

- **Other federal agencies:** The AUMWG representative, when appropriate, will encourage the partner agencies to collaborate when implementing AUM programs. In addressing the hazards posed by abandoned mines, the agencies must work together as one government to efficiently and cost-effectively achieve shared objectives. The agencies are interdependent, or mutually reliant on each other, and can save money by jointly coordinating efforts, improving communication, sharing information, and eliminating duplication. For example, BIA will help DOE obtain access across Tribal trust land so DOE's DRUM program can inventory mines on BLM-managed land.

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

Transparency and clearly communicating information and decision-making processes are essential to maintaining public trust and involvement in AUM activities. Through DOE, AUMWG will take the following steps:

- [1] AUMWG will maintain a webpage to inform the public and a broad range of partners, stakeholders, and Tribes about AUM activity status and results.
- [2] AUMWG will feature information about events and other opportunities for public participation, input, and comment, as well as about stakeholder engagement, on its webpage.
- [3] AUMWG will develop and post fact sheets, announcements, and other information about AUM activity progress and results as they are implemented and completed.
- [4] AUMWG will develop and deploy traditional and digital mechanisms for performing outreach, sharing information, and soliciting input and comments, making sure information is presented in ways communities can easily understand it.
- [5] AUMWG will prepare an annual stakeholder report that summarizes the year's accomplishments and benefits to stakeholders.

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

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

- **U.S. Office of Management and Budget (OMB):** The AUMWG representatives, when appropriate, will engage with OMB to enable AUM activities since it prepares the president's budget proposal to Congress and supervises the administration of the agencies.

It is important to engage OMB since it evaluates the effectiveness of agency programs, policies, and procedures; assesses competing funding demands among agencies; and sets funding priorities. Ultimately, OMB ensures that agency reports, rules, testimony, and proposed legislation are consistent with the president's budget and with administration policies.

- **U.S. Congress:** The AUMWG representatives, when appropriate, will engage with Congress to address concerns with and report on AUM activities as was done through the 2014 DRUM Report to Congress. Congress takes an active interest in its constituents' inquiries and will insist each inquiry receives sympathetic consideration, equitable treatment, and timely response. AUMWG will facilitate the inquiries in a timely and accurate manner.
- **U.S. Government Accountability Office (GAO):** The AUMWG representatives, when appropriate, will engage GAO to address concerns with and report on DRUM and AML activities. GAO provides fact-based, nonpartisan, and balanced information to Congress, seeking to enhance the federal government's economy, efficiency, effectiveness, and credibility. Often called the "congressional watchdog," GAO investigates federal spending and performance. AUMWG will facilitate any audits, evaluations, investigations, and engagements, as appropriate.

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

DOE or another AUMWG member will work to expand the knowledge base on AUMs through several mechanisms such as education collaborations, training programs, and outreach initiatives and will share information with AUMWG. This is an important aspect of the working group's strategy. Members should share their experiences and expertise in these training, education, and outreach sessions.

Participating in the following efforts will help advance these objectives:

- **Professional forums:** The AUMWG representative, when appropriate, will engage with professional forums that bring together representatives from across government, industry, and academia that may influence policy development or the implementation of mining and milling sites reclamation, remediation, or post-closure management. One such forum is the Federal Mining Dialogue, known as FMD, which includes U.S. federal environmental and land management agencies. FMD oversees the environmental, health, and safety impacts of AUMs across the country.
- **Training:** The AUMWG representative, when appropriate, will provide training and observation opportunities for federal, state, local, and Tribal officials when conducting AUM activities.
- **Science, technology, engineering, and mathematics (STEM):** The AUMWG representative, when appropriate, will engage STEM education programs to increase awareness, provide education, and bring science directly to the public, especially K-12 students from low-income populations.

- ***International engagements:*** The AUMWG representative, when appropriate, will work with the international community (for example, through the International Atomic Energy Agency) to share best practices; transfer information and knowledge; understand the safety, environmental, and social requirements of uranium mining; and develop guidance for reclaiming and remediating uranium mining, milling, and other legacy nuclear sites around the world.

### **Summary**

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