

CITY OF HYDABURG

P.O. Box 49
Hydaburg, Alaska 99922
907-285-3761

March 25, 2009

Greg Killinger, District Ranger
U.S.D.A.—Forest Service
Tongass National Forest, Craig Ranger District
P.O. Box 705
Craig, Alaska 99921-9998

Re: Uranium Mine Developments at Bokan Mountain and Vicinity

Dear Greg:

The City of Hydaburg would like to express its deep anxiety about the Ross-Adams uranium mining site, and to object to any proposed new uranium mining with the Hydaburg Planning Area as defined in the Hydaburg Coastal Management Program that was effective from July 1983 to 2005 (see attached map).

We also believe that the Ross-Adams mine may be affecting the community of Hydaburg by sending "radon daughters" our way via the prevailing southeast winds, as this mining site is directly in the path of these southeast winds. As you know, uranium mining occurred at the Ross-Adams site on Bokan Mountain from 1957 to 1971 when various mining companies took approximately 94,000 tons of uranium ore and left more than 45,000 cubic yards of uranium tailings on the site that are still contaminating the area with radioactivity, perhaps as far away as Hydaburg.

We call your attention to a lecture delivered to the World Uranium Hearing held in Salzburg, Austria in September 1992 by Dr. Gordon Edwards (a copy is attached) wherein Dr. Edwards had this to say about uranium tailings left on the surface:

"...as the tailings are sitting there on the surface, they are continually generating radon gas. Radon is about eight times heavier than air, so it stays close to the ground. It'll travel 1,000 miles in just a few days in a light breeze. And as it drifts along, it deposits on the vegetation below the radon daughters, which are the radioactive byproducts that I told you about, including polonium. So that you actually get radon daughters in animals, fish and plants thousands of miles away from where uranium mining is done. It's a mechanism for pumping radioactivity into the environment for millennia to come, and this is one of the hidden dangers.

Hydaburg is a mere 33 miles from the mining site and is in the pathway of the prevailing southeast wind. What are we to think as to the risks to public health in Hydaburg? The high cancer rate here has been a puzzlement for years, could the high rate be due from the contaminated waste piles at Bokan? As Dr. Gordon states:

"...there are two categories of human illness that everyone agrees can be caused by exposure to atomic radiation even at very low levels. They are (1) cancers of all kinds, and also (2) genetic mutations -- which can be caused right down to the lowest levels of radiation exposure."

We have reviewed the 2004 Preliminary Assessment and Site Inspection performed by

Kent & Sullivan, Inc., an environmental consultant to the U.S.D.A. Forest Service, Alaska Region, in which they discuss what they found on the Ross Adams site. They begin their report by citing a 1997 BLM Removal Preliminary Assessment report on the area. This was a report of conditions at the site and whether the site warranted cleanup and removal of hazardous wastes under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 as amended by the Superfund Amendments and Reauthorization Act of 1986:

In 1995 and 1997, the Bureau of Land Management performed a Removal Preliminary Assessment (RPA) and identified nine acres of waste rock dumps and road system segments with gamma radiation levels greater than 100 micro roentgens per hour ($\mu\text{R}/\text{hr}$) compared to background levels of 13 to 44 $\mu\text{R}/\text{hr}$. Gamma radiation levels greater than 1,000 $\mu\text{R}/\text{hr}$ were identified on the four main waste rock dumps. Two waste rock samples were collected and contained elevated total uranium and Ra-226 activities. Surface water *sampling indicated that the mine drainage and streams below two waste rock dumps contain elevated gross alpha and gross beta radiation levels compared to background surface water. Air samples in the mine contained elevated radon activities between 212.3 and 540.5 pCi/L compared with the residential air benchmark of 4 pCi/L.*

Kent & Sullivan go on to list the hazardous substances found at Ross Adams:

Hazardous Substances

Waste rock, soil, stream sediment, and marine sediment samples contained the following analytes in concentrations that exceed background references: Arsenic, lead, total uranium, numerous radionuclides in the U-235, U-238, and Th-232 decay chains.

Surface water samples contained the following analytes in concentrations or activities that exceed the background references: Total uranium, Ra-226, Ra-228.

Sources

The areas listed [as follows] are discrete sources of observed contamination: 900-/00t level dumps; 700-/00t level dump; 300-/00t level dump; are staging area (OSA); Mine Road; Haul Road; 7001900-/00t level soil; OSA soil; Underground mine workings.

The mine dumps, OSA, and roads contain an estimated 45,000 cubic yards of mine waste rock and the contaminated soil adjacent to the waste rock sources cover at least 3.3 acres. Soil is treated as a source in this report in accordance with CERCLA guidance although it is recognized that soil contamination has resulted from the migration of hazardous substances from waste rock sources. The mine waste rock and soil sources are direct exposure routes to human and terrestrial receptors via direct contact, ingestion, inhalation, external radiation, and food-chain exposure routes and have also resulted in observed releases to the surface water and air pathways.

The underground mine workings are a source of metals and radioactivity with direct exposure routes to human and terrestrials receptors via inhalation of radon emissions and has resulted in observed releases to the surface water and air pathways.

Not being a scientist, this is scary stuff! The report goes on to identify observed contamination and targets with actual or potential "on-site" and "off-site" exposure. Although the target distance limits would appear to eliminate Hydaburg from potential harm, we would call your attention to the CERCLA definition of Target Distance Limit, "*if a sampling point meeting the criteria for an observed release is located beyond the four-mile radius, that point defines the outer boundary of the target distance limit.*" Is the Southeast Wind, here in southeastern Alaska strong enough to carry radioactivity to Hydaburg?

In April of 2008, Landmark Alaska received a permit from the State of Alaska to drill exploratory core samples over a wide area in the Kendrick Bay watershed. We understand that they are seeking uranium and rare earth elements. The community would like to be kept informed of any further mining activities within the "Hydaburg's Planning Area" as soon as they are proposed and certainly before they are implemented as it will inevitably affect the habitat of wildlife the community depends upon for their subsistence.

The community does not have a current or active Coastal Management Program, but under its former plan, the community identified a planning area that was acknowledged by the State of Alaska as being important to the subsistence needs of people of Hydaburg; this area includes the areas immediately adjacent to Bokan Mountain.

To Sum Up

The community of Hydaburg would like:

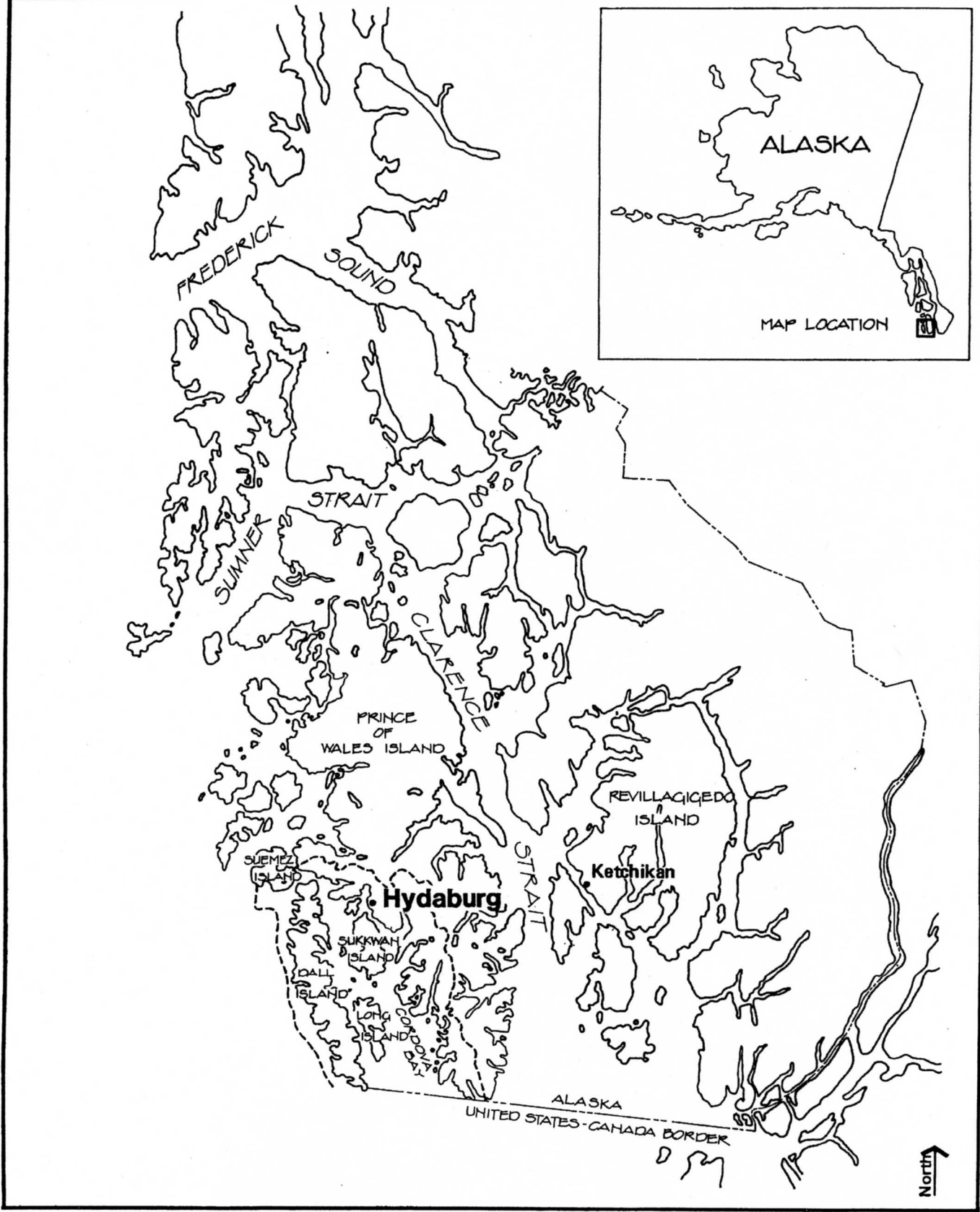
1. Assistance in understanding the findings of the Kent & Sullivan's *2004 Assessment and Inspection*.
2. To know when the Ross Adams Site will be cleaned up?
3. To have a Health Impact Study performed prior to further developments in the area of Ross-Adams mine.

Uranium is "*the deadliest metal on earth!*" Please help us kept Hydaburg radioactive-free!

Sincerely,



Adrian LeCornu
Administrator



Project Location
FIGURE 1