

GILT EDGE MINE  
SUPERFUND NPL SITE  
DEADWOOD, SOUTH DAKOTA

INITIAL REVIEW OF  
POTENTIAL FUTURE  
LAND RE-USE

PREPARED BY MANN STRATEGIES, INC.  
IN SUPPORT OF  
THE COMMUNITY INVOLVEMENT PLAN

APRIL 29, 2005





# **Community Involvement Plan**

## **Gilt Edge Superfund Project**

**Final Report**  
**April 29, 2005**

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## **Methodology**

**Mann Strategies, Inc. was retained to conduct activities related to a Community Involvement Plan regarding the prospective reuse of the Gilt Edge Superfund Project located in Lawrence County, South Dakota.**

**The CIP is intended to solicit ideas, suggestions and opinions from community officials and stakeholders regarding the prospective sustainable reuse of the mine site.**

**The target audience selected included owners of property adjacent to or in close proximity to the site; landowners downstream of the site; federal, state and local officials; stakeholder groups, civic groups and interested individuals.**

**The contractor developed several marketing methods to advise the stakeholder groups about the CIP and how they could participate.**

**Two groups were targeted for meetings. Large meetings were conducted to provide the public at large with an opportunity to provide input. Small meeting groups included governmental entities, specific stakeholder organizations, civic groups and individuals.**

**A media plan was implemented to gain earned media stories. A self-mailer brochure was designed for distribution to the target audience and a website was constructed to provide an additional method for comment. A powerpoint presentation was designed for use at various meetings.**

## **Marketing Methods and Materials**

**The marketing methods used to implement the CIP included several tools to introduce the project to the public.**

**A self-mailer brochure was designed for general distribution to interested parties. The brochure briefly covered the CIP purpose, included a brief history of the Gilt Edge Mine and outlined federal remediation goals and objectives. The brochure also noted the date, time, and place of two large group meetings and promoted the [giltedgeuse.com](http://giltedgeuse.com) website.**

**A mailing address database was constructed to use as a primary method of brochure distribution. Over 210 brochures were distributed via mail. Nearly 400 brochures were distributed at other meeting venues and meetings with individuals.**

**A website domain name was registered as [giltedgeuse.com](http://giltedgeuse.com) and the website went live March 8, 2005. From March 8<sup>th</sup> through April 27<sup>th</sup>, the website was visited 433 times by 133 visitors. The website was designed to mirror the brochure.**

**The website suffered technical problems that prevented some comments from being recorded and forwarded to Mann Strategies. The original hosting company was terminated and a new hosting company took over operation of the site. It is not known how many comments were lost due to the technical problems, but the number of comments gained through the website was disappointing.**

**Press Releases were prepared and distributed to regular local media outlets including electronic and print media. The Rapid City Journal, Black Hills Pioneer, KEVN television and KOTA radio and television all participated in coverage of the large meetings and the CIP process.**

## **Target Audience**

**Mann Strategies created a list of target audience members in five categories:**

### **1. Governmental Entities**

- a. US EPA**
- b. US Forest Service**
- c. SD Dept. of Environment and Natural Resources**
- d. SD Dept. of Game, Fish & Parks**
- e. Legislative Delegates**
  - Dist. 28B**
  - Dist. 29**
  - Dist. 31**
- f. County Commissioners**
  - Meade Co.**
  - Lawrence Co.**
- g. City Mayors**
  - City of Lead**
  - City of Deadwood**
  - City of Sturgis**
- h. Tribal Government**
  - Cheyenne River Sioux Tribe**
  - Ogallala Sioux Tribe**
- i. SD Science and Technology Authority**

### **2. Local landowners and residents**

- a. Landowners and residents inside or adjacent to the project boundary.**
- b. Landowners and residents living downstream of the project.**

### **3. Stakeholder Groups**

- a. Black Hills Regional Multiple Use Coalition**
- b. The Isaak Walton League of America**
- c. Audubon Society**
- d. Spearfish Canyon Owners Association\***
- e. SD Off Highway Vehicle Coalition**

**4. Civic Groups**

- a. Rapid City Chamber of Commerce – Govt. Aff. Comm.**
- b. Rapid City Chamber of Commerce – Ag Comm.**
- c. Black Hills Economic Development Corp**

**5. Individuals**

- a. Van Lindquist – BH Council of Local Govts.**
- b. John Loucks – West Dakota Water Dev Dist**
- c. Jack Cole – Spearfish Canyon Preservation Trust**
- d. Joe Harrington – Arcadis**

**Members of these groups were contacted in one of the following ways:**

- Mail**
- Telephone**
- Organization meetings**
- Personal contact**

## **Large Group Meetings**

**Two large group meetings were conducted by Mann Strategies. The first meeting was conducted on March 23, 2005 at 7:00pm in the Galena Room of the Hampton Inn/Four Aces Casino in Deadwood, South Dakota.**

**The first meeting was well attended with approximately 25 individuals present. Also attending were members of the local media. The Rapid City Journal and BH Pioneer Times were represented and KEVN television did a story on both the 5pm and 9pm news broadcasts. Associated Press stories were picked up by the Sioux Falls Argus Leader and the Yankton Daily News.**

**The second meeting was conducted at the same time and place on April 13, 2005 and was also well attended. Thirty individuals attended the third meeting. KOTA provided television coverage of the second meeting.**

**Representatives of SD DENR, US EPA and SD GF&P were in attendance at both meetings and were available to answer technical questions at the conclusion of the meetings.**

**Each meeting lasted nearly two hours. Participation was good at the first meeting and better at the second meeting. Even though several individuals tried to turn the meetings into a opportunity to criticize the project, the tone of the meetings was calm and cooperative.**

**Participants included local landowners and residents, individuals interested in outdoor recreation, environmental organizations, and local government officials.**

**A list of participants in attendance at these meetings is attached to this report.**



## **Small Group Meetings**

**Small group meetings were conducted with many of the target audience groups. Mann Strategies attended the regularly scheduled meetings of the following groups:**

- **BH Regional Multiple Use Coalition**
  - **Represents approximately 40 public land user groups**
- **Isaak Walton League**
- **Rapid City Chamber of Commerce**
  - **Government Affairs Committee**
  - **Ag and Natural Resources Committee**
- **Off Road Riders Association**

**Mann Strategies met face to face with members of the following groups:**

- **DENR (Secretary Pirner, Mark Lawrensen, Mike Cepak)**
- **EPA (Ken Wangerud, Nancy Mueller)**
- **SD Legislators (Sen. Apa, Sen. McNenny, Rep. Van Norman, Rep. Hills, Rep. Turbiville, Rep. Rhoden)**
- **County Commissioners (Douglas, Seward, Mattson, Weisenberg)**
- **City Mayors (Nelson, Toscana)**
- **Cheyenne River Sioux Tribe (Carlyle Ducheneaux)**
- **Prarie Hills Audubon Society (Nancy Hilding)**
- **BH Economic Dev Corp (Greg Bartron)**
- **W Dakota Water Development Dist (Van Lindquist, John Loucks)**
- **BH Council of Local Govts. (Van Lindquist)**
- **Spearfish Canyon Preservation Trust (Jack Cole)**
- **Arcadis (Joe Harrington)**
- **Spearfish Canyon Foundation Board Member (Jim Dunn)**
- **SD Science and Technology Authority (David Snyder)**
- **Black Hills National Forest (Rick Hudson)**

## **Ideas, Suggestions and Opinions**

**The ideas suggestions and opinions gathered during the course of this project are divided into three categories. They are:**

- Remediation Only**
- Limited economic benefit**
- Maximum economic benefit**

**The ideas, suggestions and opinions solicited from participants fall into one of these three categories. The results are reported without attribution unless a group or individual wished to be credited with the comments.**

### **Remediation Only**

**A small but vocal and sincere group of participants favor a remediation only option for the future of the Gilt Edge Mine Site. This group dismissed the importance of an economic benefit being derived from the site. They want a remediation plan that protects human health and safety, and the environment, but does not include a development option.**

**Wildlife habitat was favored by this group of participants some of whom reside adjacent to the site. Protection of their long term quiet enjoyment of their property was the foremost consideration. Most of the participants in this group had no objection to low impact uses of the property including cross country skiing, hiking, and other forms of eco-tourism. Participants in this group urged the pursuit of an alliance with Rocky Mountain Elk Foundation or Nature Conservancy to improve the habitat for Elk and other unique wildlife species. One participant requested that decision makers ask themselves, "How would I like living next to this?", (Any proposed option), before making a recommendation.**

**One suggestion requested that EPA reconsider the short term goal of preventing bat residency. The suggestion conveyed the impression that certain adits, which are part of the old mine workings, be considered for bat habitat improvement in areas of the mine that may not be subject to ARD.**

**The county commission endorsed a wildlife habitat option; however, the endorsement was made before the conduct of the CIP.**

### **Limited Economic Benefit**

**A significant number of participants suggested valid uses for the Gilt Edge site, but most of these uses would generate little revenue and limited economic benefit.**

**This group identified a wide variety of activities that they would like to see the site provide. Among these are:**

- **Shooting Facilities**
  - **Rifle**
  - **Pistol**
  - **Archery**
- **Off Highway Vehicle Facilities**
  - **ATV**
  - **Four Wheel Drive**
  - **Snowmobile**
  - **Dirt bikes**
  - **Cycling**
  - **Horseback Riding**
- **Ice Skating Facilities**
  - **Figure skating**
  - **Hockey**

**Participants supporting these uses argue that with forest closures and limited opportunities to develop alternative facilities, the mine site provides an excellent opportunity to create "Destination Recreation".**

**Each of the outlined uses could involve competitive events which would create spin-off economic benefits. Hotels, restaurants, and other service businesses would benefit from the development of recreational uses. They also believe that facilities could be designed and constructed in a manner that would be compatible with other uses and enjoyment of the property, without adding any risk to the environmental situation at the site.**

**The Isaak Walton League is a strong supporter of the destination recreation idea and has submitted a written statement which appears in the attachments to this report.**

**Strong support for the off road element of the recreation option is offered by two large and well organized groups. The SD Off Highway Vehicle Coalition and The Off Road Riders Association are large membership groups which believe that the site can serve as a premier off road facility that does not conflict with the EPA's long or short term goals. This group left a number of comments on the website. Those comments are attached to this report. The Board of Directors officially endorsed the option in writing a copy of which is attached.**

**Senator Jerry Apa specifically endorsed this option as one he could support.**

### **Maximum Economic Benefit**

**Another significant participant group supports the concept of returning the site to the tax rolls as an economically productive property. The Cheyenne River Sioux Tribe has developed a comprehensive plan for the site including the following elements:**

- **CRST assumes ownership of the property**
  - **Placing the property in trust**
  - **Ownership other than trust**
- **Create trust fund to provide payments in lieu of taxes to local govt.**
- **Multi use plan may include**
  - **Corporate retreat facilities**
  - **Residential development**
  - **Native American Cultural Center**
  - **Drug Rehabilitation Facilities**
  - **Golf Course**
  - **Strawberry fields and other fruit production for use in winemaking**

**The tribe has given great time and attention to a plan that will satisfy most of the concerns about the property. CRST is not interested in using the property for the purpose of gaming and**

**indicated that they would put that stipulation in writing. The tribe believes that the multi-use concept would be the only way to generate enough revenue to make their plan viable. The tribe asserts that they have the necessary administrative capabilities to develop and manage this kinds of facilities outlined in their plan.**

**A floral garden similar to Butchart Gardens in British Columbia was suggested as a potential tourist attraction that is compatible to other uses of the property. It could also generate tourist visitation that could support this concept as a viable economic concern.**

**Because many plants that would grow in the Black Hills climate require a neutral or acidic soil environment, and because the native soil is highly alkali, the possibility exists that many plants could flourish in the soil at the project site. It was suggested that some consideration be given to using the acidic water to nourish the plants.**

**A residential housing development was indicated as a valuable economic development idea. Housing would put the property on the tax rolls and residential wastewater treatment could be combined with an ARD water treatment facility. This combination of treatment facilities could off-set the long term water treatment costs.**

**Discussions within both the large and small groups indicated a strong endorsement of a research, technology and education option for the site. The site may provide a world class laboratory for institutions of higher education. Scientific techniques that have already been implemented at the site provide a unique opportunity to pursue development of an applied geophysics curriculum. Alliances among SD DENR, US EPA, SD SM&T, and the SD Science and Technology Authority could provide meaningful learning opportunities and potential economic benefits.**

**Techniques developed at Gilt Edge could lead to applied science methods that could be used world-wide to address the problem of ARD that exist elsewhere. The ability to exploit opportunities for applied science is an economic development tool that has proved very beneficial in other communities in the US.**

## Summary

**The public is interested in what happens at the Gilt Edge Superfund Project Site. It took some time for people to understand the purpose of the Community Involvement Plan. Participation improved after the first large group meeting and more people participated in the small group meetings after reading newspaper articles or watching the television reports. Some negative letters to the editor and postings on the website were expected. Two letters to the editor criticized Brohm Mining Company, SD DENR, Senators Dunn and Apa, and Mann Strategies. Three emails criticized the superfund project. Very little negative comment was heard during meetings, even some traditionally negative participants were optimistic about the direction being taken to gather public input.**

**The Cheyenne River Sioux Tribe presented a strong and well thought out plan for the future of the Gilt Edge site. They have obviously spent a great deal of time and effort developing ideas they believe are compatible with the property and the community.**

**The prospect of a shooting range suitable for competitive matches created a great deal of excitement with the Isaak Walton League. Shooting sports have few alternatives that offer the kind of suitable location offered by the Gilt Edge site.**

**The same holds true for the SD Off Highway Vehicle Coalition and the Off Road Riders Association. As more of the National Forest is closed to off - road activities, this group has nowhere to go to pursue their activities. Most of the members of the two groups that are concerned about options that provide some economic benefit, agree that the site would support a variety of activities. They also agree that the variety of uses would be compatible if not complimentary to one another.**

**Local residents and landowners want to preserve and enhance the wildlife habitat that makes this location attractive to them. They may envision a mini-state park managed for what has**

**become known as eco-tourism. These participants support low impact activities that they believe will attract people interested in hiking, cross country skiing, hunting or the simple enjoyment of an undeveloped nature preserve.**

**A large majority of the organizations and individuals that participated in this project are anxious to be involved as the decision making process moves forward. The ideas, suggestions and opinions contained in this report are brief sketches of the more comprehensive visions held by the various groups. They look forward to working with the SD DENR and US EPA to refine their ideas and pursue the implementation of an option that will provide for the sustainable reuse of the Gilt Edge Superfund Project.**

**Respectfully Submitted,**

**Larry A. Mann, President  
Mann Strategies, Inc.**



## **Attachments**

- **Brochure**
- **Mailing address database (on disk)**
- **Large meeting participants**
- **Press Releases and news stories**
- **Written Endorsements**
  - **Isaak Walton League**
  - **Off Highway Vehicle Coalition**
- **Website Comments**
- **PowerPoint Presentation**