



We Advocate Thorough Environmental Review

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Todd Juhasz, City Manager
Muriel Terrell, Finance Director
City of Mt. Shasta
305 North Mt. Shasta Boulevard
Mt. Shasta, CA 96067

Sent Via email to: tjuhasz@mtshastaca.gov; mterrell@mtshastaca.gov

Dear Ms. Terrell and Mr. Juhasz:

Thank you for the opportunity to comment on the **Draft Application for the Southern Dump Area EPA Brownfield Cleanup at The Landing.**

First some general comments followed by specific comments about the draft grant application.

General Comments:

According to the grant application and the Geocon ABCA letter, with the proposed removal from The Landing of contaminated piles of soil, the Site will still not be ‘clean.’ Contaminants will still be present in the impacted areas such that a land use covenant (LUC) will be required to restrict future uses to commercial/industrial/recreational and thus banning uses such as residential/, schools, daycare, hospitals, senior care facilities, etc. Removal of the piles will allow productive use of the Site (activities with short-term public exposure to the Site) while preventing harms to sensitive populations who would otherwise experience longer exposure time. This all seems reasonable. However, we note there is a residential community downhill and west of Interstate 5 that depends upon well water for domestic use. We have concerns that contaminants remaining in the soil after the piles are removed could leach into groundwater and move (downhill) into the neighboring community’s wells. Thus ongoing monitoring on the Site is warranted. This would not be a difficult task, given that monitoring wells already exist on The Landing property. Rather than destroy all the monitoring wells as currently proposed, we recommend keeping a few of the existing groundwater monitoring wells and establishing an ongoing monitoring program to test for compounds of concern. This is important for protecting the neighborhood west of the Site (west of I-5) that depends upon well water for domestic use.

Secondly, we note that whereas the cleanup of The Landing has taken over thirty years and is on course to cost at least \$1.5 million, the result has been simply to move the problem from one place to another (the land fill)--the toxic contaminants have not actually been destroyed. Looking to the future, the best solution to such problems is prevention. Thus as The Landing is being developed for productive use,

please prevent potentially polluting projects on that property, as well as all areas within the City and its sphere of influence, to prevent future cleanups that are so problematic and costly for the public.

Specific Comments on the Draft USEPA Grant Application:

Narrative Information Sheet, item 5b. Whereas the item asks for the highest ranking elected official, the entry is for an unelected staff person. Should that list the mayor?

Section 1.a.ii. Description of Brownfield Site, 4th sentence: *“Approximately 600 cubic yards of non-hazardous petroleum-impacted soil and 800 cubic yards of non-hazardous pentachlorophenol-impacted soil remain on the Site.”* The numbers here are consistent with the information in the Geocon ABCA letter, but inconsistent with the rest of the grant (e.g., Section 3a) which says 700 and 900 cubic yards. Why the discrepancy?

Section 2.a.ii. 1st paragraph:

“A wide array of contaminants has accumulated on this brownfield site through its 125 years of use. Assessments over the last twenty years have identified residual hazardous substances and petroleum in the soil and groundwater. Ground water contamination broadens local cumulative environmental issues due the location of our community at the headwaters of major water-sheds such as the Sacramento River. The Sacramento River feeds multiple reservoirs downriver which supply water to more than 14 million people (US census 2010).”

The draft application acknowledges the connection between the contaminated soil and groundwater and that contaminants have been identified in groundwater under the Site. This is why ongoing monitoring of the groundwater is critical for protection of downstream/downhill communities, as discussed in our first general comment.

Typos:

Section 1.c.iii, 1st paragraph, 4th sentence: *“The City is has created a draft Enhanced Infrastructure Financing District plan...”* Delete “is”.

Section 1.c.iii, 2nd paragraph, 3rd sentence: *“Development of this site with catalyze development across the entire Landing.”* ‘with’ should be ‘will’.

Section 1.c.iv? The section following Section 1.c.iii is inappropriately labeled 1.c.ii. This should be “Section 1.c.iv. Use of Existing Infrastructure.”

Section 2.a.i, 4th sentence: *“These preexisting conditions have completed exacerbated the local resources by the pandemic.”* This sentence is grammatically incorrect and doesn’t make sense. Please correct it.

Section 2.a.ii. 1st paragraph, 3rd sentence:

“Ground water contamination broadens local cumulative environmental issues due to the location of our community at the headwaters of major water-sheds such as the Sacramento River.” Add the underscored ‘to’.

Section 2.a.ii: There is a sentence in between table 1 and Table 2 that is not a complete sentence: *“While the EJScreen Tool can be utilized to further demonstrate the environmental exposures and demographic characteristics for the City of Mt Shasta in comparison to the State and USA averages.”* It would read better as such: *“The EJScreen Tool was used to further demonstrate the environmental exposures and demographic characteristics for the City of Mt. Shasta in comparison to the State and USA averages (Table 2).”*

Section 2.a.ii, 4th paragraph, 2nd sentence: *“The first and most important impact will be minimizing the potential for the community to be exposed to contaminants”* A period is needed after the sentence.

Section 3.b. Tsk/Activity 1, iv, last phrase, *“...participation in at regional and national conferences/training.”* Delete “in”.

Section 3.d, 2nd sentence: *“Moreover, contracts for procured firms are written to ensure environmental cleanup results are achieved...”* Add the underlined “to”.

Geocon ABCA and Phase II letters:

In both of the Geocon supporting documents (ABCA and Phase II), the figure of the “Site Location Map” shows a street mislabeled as “Lake Street”. It is actually Ream Avenue.

We Advocate Thorough Environmental Review (W.A.T.E.R.) is a grassroots, non-profit 501(c)3 organization dedicated to protecting Mount Shasta’s water and other natural resources from privatization and depletion by extraction for corporate profit, protecting groundwater from contamination by industrial activity, and protecting the environment from other inappropriate and polluting industrial/commercial activities. Thus we appreciate the City’s efforts to clean up the brownfield site at The Landing. With your consideration of the concerns expressed in this letter, we support submission of the grant application to the EPA.

Sincerely,



Geneva M. Omann, Ph.D.
Secretary, Board of Directors
We Advocate Thorough Environmental Review