

# Draft Application for the Southern Dump Area EPA Brownfield Cleanup at The Landing



City of Mt. Shasta

U.S. Environmental Protection Agency

FY22 Brownfield Cleanup Grant Application Draft

Opportunity #EPA-I-OLEM-OBLR-22-09

Application Deadline: November 22, 2022

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## NARRATIVE INFORMATION SHEET

\*Once Approved, this Letter will be printed on Official City Letterhead

November 22, 2022

The City of Mt. Shasta is submitting its application for an FY 2022 EPA Cleanup Grant. The following information satisfies the Narrative Information Sheet requirement in the application on page 33 of the Notice of Funding Opportunity.

- 1. Applicant Identification:** 305 N. Mt. Shasta Boulevard, Mt. Shasta, California 96067
- 2. Funding Requested**
  - a. Grant Type:** Single Site Cleanup
  - b. Federal Funds Requested:** \$707,740
- 3. Location:** City of Mount Shasta, Siskiyou County, California
- 4. Property Information:** The Landing is a 128-acre brownfield site located at approximately 2329 S. Mt. Shasta Blvd., Mt. Shasta, CA 96067. The targeted area will be the New Mill Southern Area.
- 5. Contacts:**
  - a. Project Director:**  
Muriel Terrell, Finance Director  
(530) 926-7510  
[mterrell@mtshastaca.gov](mailto:mterrell@mtshastaca.gov)  
305 N. Mt. Shasta Blvd.  
Mount Shasta, CA 96067
  - b. Highest Ranking Elected Official:**  
Todd Juhasz, City Manager  
(530) 936-7510  
[tjuhasz@mtshastaca.gov](mailto:tjuhasz@mtshastaca.gov)  
305 N. Mt. Shasta Blvd.  
Mount Shasta, CA 96067
- 6. Population:** The city serves as the center for regional tourism and is the second largest by population in Siskiyou County, with 3,250 residents within its 3.75 square mile boundary and an additional 3,000 residents living within its sphere of influence.
- 7. Applicable Other Factors Checklist:**
  - a.** The community population is less than 10,000. Noted within the Narrative on page 2 and above in number 6.
- 8.** This application **does not** contain information that is confidential, privileged, or sensitive. (n/a)

## CLEANUP NARRATIVE

### 1. PROJECT AREA DESCRIPTION & PLANS FOR REVITALIZATION

#### **1.a. Target Area and Brownfields**

##### 1.a.i. Overview of Brownfield Challenges and Description of the Target Area

Mt. Shasta is a rural alpine city in Northern California that sits on the southern end of Siskiyou County; the state's fifth largest county in acreage and 33rd in population. The City is the center for regional tourism and is the second largest by population in Siskiyou County, with 3,250 residents within its 3.75 square mile boundary and an additional 3,000 residents living within its sphere of influence. Siskiyou County grew rapidly during the California Gold Rush yet experienced the largest influx of people during the growth of the timber economy in the following century. Mt. Shasta was once considered vibrant and prosperous place to live, sustained by agriculture, rail, and timber industries. This history is still part of the cultural values and identity of Siskiyou County.

The imposition of restrictions on logging in the late 1980's hit Mt. Shasta hard and left large sites like the mill in the south part of the town empty and an eyesore for the community. Businesses supporting timber and railroad sectors closed, leaving several properties with over 100 years of contamination scattered throughout the area. Since the mill was dismantled, the city has experienced high poverty, an aging workforce, substance abuse issues, declining school enrollment, and youth emigration. Lack of appropriate land for development due to brownfields and surrounding Federal lands impedes prosperity for the community. Adding to these issues, the proximity of the Oregon border often sends businesses or customers north for zero sales taxes incentives, which further damages the city's tax base and is an impetus for developing local businesses that will competitively supply local needs. Despite this, renewed interest in developing the mill site, rebranded as The Landing, has catalyzed assistance over the last 20 years from EPA, the U.S. Economic Development Administration (EDA), the State of California, and community partners. In particular, the site has been targeted as a prime location for development as a commercial/industrial area with a pedestrian/bike greenway connecting the planned housing development across the street to public trails nearby.

##### 1.a.ii. Description of Brownfield Site

The Landing is a 127-acre brownfield with a myriad of contamination issues due to its historic use as a mill. Within the Landing, the target area for this cleanup is the southern area of the new mill. Overgrown vegetation and remnant concrete occupies the former 8,000-gallon diesel aboveground storage tank (AST), a 10,000-gallon gasoline underground storage tank (UST), and a burner location in the target area. Approximately 600 cubic yards of non-hazardous petroleum-impacted soil and 800 cubic yards of non-hazardous pentachlorophenol-impacted soil remain on the Site. Soil stockpiles were previously characterized as non-hazardous which, though new characterization will likely be required by the landfill prior to disposal, is not anticipated to change. Moreover, underutilized monitoring wells exist across the site and need to be destroyed. To achieve a condition of No Significant Risk, use restrictions/institutional control for containment will be developed for the entire target area encompassing the AST, UST, and burner. The remediation proposed in this cleanup application is consistent with the Analysis of Brownfields Cleanup Alternatives (ABCA; attached), State Required Removal Action Workplan (RAW), and California Environmental Quality Act (CEQA) process vetted by the community (historically and recently per the public meeting), EPA, and the California Department of Toxic Substance Control (DTSC). The remediation techniques selected will protect human health and the environment while stimulating redevelopment.

#### **1.b. Revitalization of Target Area**

##### 1.b.i. Reuse Strategy and Alignment with Revitalization Plans

The Landing is one of Mt. Shasta's (and Northern California's) largest and most marketable commercial properties, and the County's top economic development priority. Under a previous EPA grant, the City completed the Specific Land Use Plan for the Roseburg Commerce Park (Specific Plan) in August 2016. The Landing Specific Plan provides the City with an opportunity to develop a mixed-use site that has an attractive location for businesses and visitors while taking advantage of the idyllic alpine setting and dynamic

location. Development of both light and commercial uses, an RV Park, office spaces, housing, and an open space/recreation park, will not only be connected by roadways, but an ecological trail system leading to habitat and wetland restoration, wildlife viewing opportunities, and wilderness preservation.

Located adjacent to the current road entrance from Mt. Shasta Blvd, the target area includes Development Area II - utilized for light commercial and office uses that will serve the Mt. Shasta community and nearby towns. Within the restrictive land use covenant area, light industrial uses such as manufacturing, processing, assembly, and storage will be permitted. Trails across the site will connect these spaces to the nearby downtown corridor and adjacent national forest lands. Any funding remaining after cleanup of the target areas will be utilized to remediate adjacent sites within the Landing to further develop the area. Although not located in an Opportunity Zone nor Federally designated flood plain, the cleanup and redevelopment will follow the spirit of economic development and environmental stewardship.

The City has made sure to work closely with Siskiyou County to align goals, environmental regulations, and policies with the Siskiyou County General Plan (2014), Housing Element (2014), and Land Use Element (1997). The Specific Plan coincides with the guidelines of the City of Mt. Shasta in order to align with and achieve the goals of local planners. These goals have been designed to coincide with community goals and a string of stakeholder meetings and information-gathering activities over the last few years. In the final stage of adopting the Specific Plan, the public was formally provided with an opportunity to comment via the CEQA process. The development plans, City policies, and guidelines encourage environmental practices such as recycling, emission reductions, green remediation, and green building (LEED, solar, etc.). In recent years and during cleanup, the City Planner met onsite with community members to ensure support for the specific plans are congruent. With support from the community, the cleanup and eventual redevelopment facilitated by this grant will follow and be developed in cooperation with City planning elements, policies, and procedures.

#### 1.b.ii. Outcomes and Benefits of Reuse Strategy

During cleanup implementation, grant administrators will encourage developers and contractors to hire local people to perform redevelopment activities including carpenters, plumbers, electricians, etc. thus providing employment opportunities for locals and minimizing carbon footprints. Once cleaned, the target area will support sustainable business development, foster job growth, and provide non-economic benefits by creating community parks and reducing the public's exposure to possible contaminated soils. One major outcome will be the removal of blight and creation of prime economic opportunities. With existing perceptions of pollution, investment is discouraged, and development is delayed. Brownfields redevelopment in other communities in Siskiyou County has illustrated that companies are willing to move into the region when industrial and commercial land is made available. Bringing former brownfields to development readiness will then increase economic development and employment and decrease poverty. In particular, the funding of performing arts, parks, and boutique shops should bring in new visitors who will spend money locally. According to preliminary area-wide plans, the Landing will provide 25 acres of greenspace, 25 acres of public space, 50,000 square feet of retail, 50,000 square feet of office space, and over 300 jobs. This will increase land value and ideally raise property and business taxes by approximately 9%, increasing the economic welfare of the community. Taken together, this will assist Mt. Shasta residents by providing them with more funding for services and will make Mt. Shasta a leader in tourism and recreational innovation in the region. This infill development should then alleviate poverty and drug abuse by decreasing unemployment by 3.4% to the national average; providing more employment opportunities for the youth and citizens of Mt. Shasta. No displacement of residents will occur by completing this project.

#### **1.c. Strategy for Leveraging Reuse**

##### 1.c.i. Resources Needed for Site Characterization

No additional assessment will be needed. The action will include removing the last stockpiles and ensuring a sitewide restrictive land use covenant is completed in accordance with DTSC approvals.

### 1.c.ii Resources Needed for Site Remediation

The funding requested in this application will adequately complete the final steps of remediation needed to clear over 20-years of multi-agency cooperative work at the Landing. Estimates have been provided by a Qualified Environmental Professional and account for stakeholder engagement and contingencies.

### 1.c.iii. Resources Needed for Site Reuse

Civic leaders in Mt. Shasta consider economic development to be a critical foundation to the long-term health and growth of Mt. Shasta. As an incorporated City, Mt Shasta is eligible to compete for funding from several sources such as State, Federal, and private foundations. Successful economic development efforts include preparing the city for new developments such as electric vehicle charging stations, upgraded sewer infrastructure, “shovel-ready” sites, and business attraction marketing. The City is has created a draft Enhanced Infrastructure Financing District plan; a deliverable from the USDOC Economic Development Administration grant to develop and implement passive financing opportunities to incentivize infrastructure, site preparation, and beautification of the Landing. Moreover, the City has developed a network alongside strategic community partners to locate and attract these projects and have obtained as much leveraged funding as possible for the betterment of the City.

Centrally located within the Landing with stunning views of Mt. Shasta combined with the closest proximity to the railroad and existing infrastructure, cleanup will free the highest valued acreage on the Landing for development. Private developers are interested in taking the first step in redevelopment once the target area is cleaned. Development of this site will catalyze development across the entire Landing.

Although unsecured, the City has determined it is eligible for California Climate Change Tax Incentives, California Waterboard Grants, Statewide Park and Recreation Development funding available through Proposition 68, and US Fish and Wildlife Service Grants for the recreational assets and greenbelt planned. These opportunities will complement the City’s thriving Recreation District.

With remediation still needed, the City has not yet secured commitments for leveraged funding. However, as demonstrated in past and current EPA Cleanup Grant, the City was able to leverage the award to obtain a \$35,000 DTSC grant for remediation and a \$99,500 USDOC grant to develop financial incentives for infrastructure and reuse of the site.

### 1.c.ii. Use of Existing Infrastructure

Redevelopment of the Landing will reduce pressure to build on greenfields and result in the reuse of existing road and water infrastructure instead of expanding development outward to new properties. The revitalization and reuse of The Landing less than a mile from downtown will further allow for the preservation of outlying areas and prevent sprawl. This will also reduce the need for automobile transportation and thus reduce further environmental impacts in the area that are enumerated within the Mt. Shasta General Plan and Land Use policies.

Routine maintenance of the existing roadways has occurred through several assessment grants, cleanup grants, use of the roadways by public works, use by city police patrols, and the regular vegetation/fuels reduction work. While the property does not currently connect to sewer and waterlines, upgraded 6-8” water and sewer stubs are located at the northern extent of the property. The City received disaster funding after major flooding and has a cost estimate and feasibility plan to upgrade these necessary water/sewer connections to support commercial development at the site. Bonds are plausible, but this area is also eligible for grant opportunities include Community Development Block Grants and EDA infrastructure Grants. Furthermore, high-speed fiber optic cables along Mt. Shasta Blvd already contain the capacity and ability to connect to the Landing as soon as development occurs.

## **2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT**

### **2.a. Community Need**

#### 2.a.i. The Community’s Need for Funding

As a rural community with a small population, Mt. Shasta has not been able to tap into the dollars and resources that might be available to larger population centers. Funds generated through increases in general funds, fees, sales/property/special taxes, or assessments are extremely difficult to obtain due to the small

populations and smaller number of local businesses. Mt. Shasta is then forced to focus solely on basic services (such as public safety and infrastructure) and seek alternative funding for community and economic development activities. These preexisting conditions have completely exacerbated the local resources by the pandemic. Mt. Shasta is struggling with a small staff, layoffs due to the recession, and loss of tax base due to abandoned properties. Money raised by the City must go to basic services- schools, fire, and police. Public health service needs strain the county budget to an unprecedented level. And we do not have the resources or tax base to fund Brownfields activities. The City does have investors, a willingness to invest its own funds, and businesses interested in The Landing, but is desperate for cleanup to allow investment to truly begin.

Mt. Shasta has a 15% commercial vacancy rate for many years according to City Planning officials, which depresses the local economy and hurts property values of nearby businesses. At the same time, lower tax revenues and higher poverty continue to slow economic growth. Along with these economic hardships, the City is unable to compete for development interest with urban centers capable of providing discretionary development incentives. Moreover, with the natural beauty of Mt. Shasta comes the unanticipated environmental factors including annual fire threat and severe winter storms destroying infrastructure and requiring the city to provide services unfamiliar to urban centers. In January 2017, snowfall exceeded 4 feet causing damage from the debris fall and flooding causing permanent damage to city streets and drainage systems with an estimated \$1 million cost to the city.

At present, the City has been unable to successfully market brownfields with remaining contamination, increased trucking costs for proper disposal, and lacking economic development incentives. As long as The Landing (127 acres of 5.3% of land within the City) remains vacant it drags down the local economy and hurts our community due to lost opportunity costs and increased public cost. In fact, the existence of brownfields at The Landing has severely decreased the tax base from both individuals and businesses, removing an avenue of recovery for the City.

#### 2.a.ii. Threats to Sensitive Populations

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 to 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).

Environmental and economic issues aggravated by brownfields sites have health, welfare, and economic impacts on Mt. Shasta and beyond. Significantly higher levels of diseases in health status indicators of Mt. Shasta and greater Siskiyou County are twice as high as California and National averages (2012 CA Public Health Report). Known pollutants, cumulative exposure risks, and corresponding local disease occurrence suggests Siskiyou County and Mt. Shasta brownfields have negatively impacted the health of the targeted community. Drug use resulting from unemployment and access to this site have likely increased the cancer rate and liver disease instances as well. More directly, 2012 California Public Health data shows Siskiyou County has the largest crude death rate among all California counties (double the state average) and the second largest rate of cancer deaths in the state (2012 CA Public Health Report). Further, rates of chronic liver disease are double state and national averages suggesting long-term environmental pollution impacts on residents. All of this is likely connected to numerous brownfields throughout Siskiyou County and cumulative impacts.

A relatively high percentage of residents in Mt. Shasta have disabilities or require public support compared to the national average, further straining the economy (Table 1). Similarly, rural and isolated populations are disproportionately impacted due to limited mobility. While there are two health centers in the county, distances (sometimes more than an hour from rural cities) make reaching hospitals more of an issue. A relatively large share of Siskiyou County's population surrounding Mt. Shasta is categorized as sensitive or at-risk compared to state and national figures (Table 1). Sensitive populations include minorities, children, pregnant women, seniors, those with a disability, on public income assistance, on food stamps/SNAP, and/or

without health care coverage (Table 1). All of these factors illustrate a community in need of investment and a way forward.

**Table 1: A Larger Sensitive Population Locally Compared to State and National Averages**

	Mt. Shasta City	Siskiyou County	California	National
<b>Population with disability</b>	24%	19.5%	10%	12%
<b>Public Income Assistance</b>	11.9%	15.6%	9.3%	7.3%
<b>No Health Care Coverage</b>	14.7%	15.5%	17.8%	14.9%
<b>Elderly Poverty Rate:</b>	15.4%	10.0%	9.9%	9.4%

1 Data is from the 2010 U.S. Census data and is available at <http://www.census.gov/>.

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.

**Table 2: EJScreen Tool Compared to State and National Averages**

Category	Variable	Mt. Shasta City	California	National
Environmental	Particulate Matter (PPM)	11.1	11.7	8.67
Environmental	Ozone (PPB)	50.7	47.7	42.5
Environmental	Lead Paint Indicator	0.28	0.28	0.27
Demographic	Low Income	36%	29%	30%
Demographic	Population over Age 64	25%	14%	16%

1 Data is from the 2010 U.S. Census data and is available at <http://www.census.gov/>.

The cleanup will have multiple health and welfare benefits. The first and most important impact will be minimizing the potential for the community to be exposed to contaminants. Removing or capping soil **will allow community members, especially hikers, bikers, and others to utilize trails and greenspaces without being exposed to contaminants in the soil.** Further, improved public welfare and safety is a concern. Local police response calls can run as high as \$500 per call. Additionally, the mill is patrolled twice daily for public safety. Reducing response calls and patrols by half would save more than \$5,000 per year.

The outcomes of this project will benefit the community by increasing the health and welfare of the residents, decreasing blight conditions, alleviating crime, and creating economic benefit to the community as a whole. With this current blighted location cleaned and developed, the major source of local crime and economic malaise will be removed. The cleanup of these sites should markedly improve the overall health of the region and allow for safe and environmentally appropriate redevelopment. Further, more local jobs and higher wages, will allow families to be able to afford better health care and reduce their need for welfare.

The removal of residual hazardous substances and petroleum from ground water should protect the environment in Mt. Shasta from future leakage or chemical compromises that could injure the health of the citizens and the Mt. Shasta environment. It will also protect the rivers, waterways, and forests in the area, providing a safer ecosystem for all life in the area. Removing the risk of future exposure of citizens and animals in the region, especially fishermen, hunters, and hikers, will overall increase the safety of utilizing this land and the surrounding area.

**2.b. Community Engagement**

2.b.i Project Partners & ii. Project Partner Roles

The following table exemplifies partners identified through previous brownfield outreach engagements who continue to participate in the remediation and redevelopment efforts to date.

Organization	Contact	Support Type Role/Responsibility
DTSC	Ken Gath 916-255-3643	Oversight, Cleanup Technical Assistance, Advisory, Reporting/Management



Siskiyou County – Certified Unified Program Agency (Local Haz Mat Enforcement)	Rick Dean 530.842.2100	Oversight, Cleanup Technical Assistance, Advisory
Siskiyou County Economic Dev. Council (SCEDC)	Tonya Dowse 530.842.1638	Administration/Management; Community Outreach; Grant Process Planning;
Siskiyou Small Business Development Center	Quintin Gaddy quintin@siskiyoucounty.org	Advisory; Workforce Development/Development Prep; Business Development
College of the Siskiyous (COS)	Stephen Schoonmaker, Ed. D. 530.938.5200	Advisory; Outreach; Technical Assistance; Workforce Development
Jefferson Economic Development Institute (JEDI)	Nancy Swift 530.926.6670	Advisory; Workforce/Business Development; Community Outreach
Mt. Shasta Chamber of Commerce	Kevin Flynn 530.926.3165	Advisory; Community Outreach; Redevelopment Assistance
Discover Siskiyou	Heather Dodds heather@discoversiskiyou.com 530.842.1638	Community Outreach; Redevelopment Assistance; Trail Development
Mt. Shasta Recreation & Parks District	*Pending Participant Request	Trail Development; Technical Assistance; Outreach

### 2.b.iii. Incorporating Community Input

The City will develop a community involvement plan that incorporates a high degree of interaction with the public through meetings, public notifications, and marketing materials. Communication will include project kick-off meetings, quarterly reports to the city council, periodic progress updates and will include several meetings with stakeholders (Rotary, Chamber of Commerce, County Board of Supervisors, etc.). These meetings will obtain broad community feedback and target the needs of sensitive populations such as low-income, unhoused, and minority communities, and women. Specifically, progress updates will utilize the current [www.thelandingmountshasta.com](http://www.thelandingmountshasta.com) website, social media (Facebook, Twitter, City websites etc.), Newspaper, Radio, TV Stations, and the ACRES database. These communication methods have been shown to be effective in involving Mt. Shasta citizens through previous brownfield grant community activities and should be effective again. The majority of citizens in Mt. Shasta speak English as their primary language, but the City has assistance via local partners with translation and language services when necessary.

## **3. TASK DESCRIPTIONS, COST ESTIMATES & MEASURING PROGRESS**

### **3.a. Proposed Cleanup Plan**

Approximately 700 cubic yards of non-hazardous petroleum-impacted soil and 900 cubic yards of non-hazardous pentachlorophenol-impacted soil remain on the Site. Soil stockpiles were previously characterized as non-hazardous which, though new characterization will likely be required by the landfill prior to disposal, is not anticipated to change. Diesel- and oil-range organics (DRO and ORO) were detected maximum concentrations of 66 and 140 milligrams per kilogram (mg/kg), respectively, which are less than the landfill acceptance criteria of 8,000 and 25,000 mg/kg, respectively. PCP was detected at a maximum concentration of 4.8 mg/kg which is less than the Title 22 Total Threshold Limit Concentration (TTLC) and landfill acceptance criteria for non-hazardous soil of 17 mg/kg. Metals were detected at concentrations less than their respective TTLCs and less than ten times the Soluble Threshold Limit Concentrations (STLCs). Volatile and semi-volatile organic compounds were not detected. In addition, the Landing will require recording of a LUC to restrict future residential development where contamination remains in place above residential benchmarks. The LUC will record which COCs are present on the Site and the types of land uses that

are allowed. The LUC will recognize that the proposed recreational and commercial/industrial land use is compatible with the project cleanup goals listed above, and will state that unrestricted land uses (e.g., residential, schools, daycare, hospital, senior care, etc.) will not be allowed on certain portions of the Site where COCs exceed residential screening levels. The LUC will also recognize that drilling for water, oil, and gas is prohibited. These recommendations were selected after an in-depth analysis of the specific contamination characteristics and the proposed uses by the City of Mt. Shasta. Practicality of cleanup activities was determined along with feasibility and technical aspects of the process to conform with the Land Use Plan for light industrial and greenway redevelopment.

### **3.b. Description of Tasks/Activities and Outputs**

The City has modeled the following tasks, schedule, task lead, outputs, and budgetary estimates based on the 2019 cost estimates received for an adjacent cleanup on the Landing.

#### **Task/Activity 1: Project Management and Reporting**

- i. Project Implementation
  - EPA-funded activities in this task are related to developing the general overall approach to cleanup activities, regular reporting, fiscal administration, and a final report. The task also includes:
    - General project management - oversight, record keeping, financial management, and collaboration
    - Staff Training/Travel - attendance at Brownfields conferences/trainings
    - Contractor Procurement – the procurement of sub consultant for project management of the grant and a QEP to perform the sampling, analysis, and cleanup work on this site through the same process (completed within 3 months of award)
    - Coordinating cleanup completion certification approved by both EPA and DTSC.
    - Quarterly reporting elements: Summary of Successes/Challenges, Assistance Needed from EPA, Narrative Update, Cumulative Expenditures
    - Regular Reporting Standard Forms required by the grant
    - Data entry of project updates into ACRES Reporting
    - Final Report with goals, performance, leveraged funding, and deviations (if any)
- ii. Anticipated Schedule: *Start:* Sept. 2023      *Completion:* Sept. 2026 (life of grant)
- iii. Task Activity Leads: Sub-consultant
- iv. Outputs: The anticipated output include RFP/RFQ procurement documents; Contractual agreements with consultants; a report describing the project regulatory oversight plan, applicable fees, and points of contact for the regulatory agency; participation in at regional and national conferences/training.
- v. Budget: The total budget for this category will be \$67,900. Funds will be used for a) Attend workshops and conferences, airfare, lodging, per diem (2 x \$3,000 = \$6,000); b) Supplies @ \$ 3,000: copies, postage, phone, newspaper ads; c) Contractor procurement, contracting, distribution (100hrs at \$85/hr = \$8,500); d) Sub-consultant Project/Contractor Management (160hrs at \$85/hr = \$13,600); e) Routine Project Reporting ((10 hrs a quarter for 3 year plus time for annual reporting)150 hrs at \$85/hr = \$10,200); f) produce final report (60hrs at \$85/hr = \$5,100); g) City Personnel Project Management (300hrs at \$100/hr=\$30,000);

#### **Task/Activity 2: Community Outreach**

- i. Project Implementation
  - EPA-funded activities in this task are dedicated to public involvement and community outreach to involve the community in the brownfield's cleanup preparation, cleanup process, and engage community partners in redevelopment. This task will cover the costs associated with outreach such as human resources; advertising, meetings spaces, presentation materials, and website maintenance, etc. The community outreach will include public meetings, one-on-one meetings with developers and stakeholders, community advisory groups, developers, city staff and elected officials. Periodic updates of the project are anticipated quarterly at public meetings and virtually via electronic news updates. EPA recognition on materials produced by the grant and EPA Project Officer invitation to attend public meeting. The task includes:
    - Public Meetings, presentation materials, and handouts
    - Routine website maintenance and project updates on the current website

- Comments received from public participants
- Communications plan tracking public meetings, discussions, and a list of stakeholders
- ii. Anticipated Schedule: *Start:* Sept. 2023      *Completion:* Sept. 2026
- iii. Task Activity Leads: Procured Project Manager & City Personnel
- iv. Outputs: Quarterly Project Updates (12 over the grant lifetime); stakeholder meetings/correspondence; media updates both electronically and physically; presentation materials
- v. Budget: The total budget for this task is \$50,500. Costs include: a) City Personnel Time for Outreach (150hr x \$85= \$12,500); b) \$4,000 travel to meetings and conferences; c) Supplies totaling \$2,000 for signs, mailings, posters, website, factsheets; newspaper add; d) Project Management for presentations, edits, media, meeting etc. (350hr x \$80 = \$29,750).

### **Task/Activity 3: Cleanup Planning**

- i. Project Implementation
  - EPA-funded activities in this task will cover grant administrator and QEP costs for creation of pre-cleanup documentation, permitting, and all preparations. This was estimated using the approved cleanup planning documents (ABCA, RAW, Quality Assurance/Quality Control Plan (QAP), Sampling and Analysis Plan (SAP), Transportation Plan, and Mitigation Measures) cost estimates from the 2022 cleanup cost estimates on an adjacent site. The task also includes:
    - RAW addendum
    - Review of mitigation measures and permitting requirements from the California Department of Fish and Wildlife, California Regional Waterboard, State Historic Preservation Office, City Grading Requirements, and other agencies as applicable
    - Amended DTSC VCA for state oversight and services
      - State Closure Letter/No Further Action Letter
- ii. Anticipated Schedule: *Start:* Mar. 2024      *Completion:* August 31<sup>st</sup>, 2024
- iii. Task Activity Leads: Procured Project Manager & QEP
- iv. Outputs: permitting documents required for cleanup implementation; RACR; Soil Management Plan; Restrictive Land Use Covenant; State Closure Letter/No Further Action
- v. Budget: The total for this task is \$95,000 for the QEP and Project Management consultant to complete any pre-construction & permitting requirements for the landfill and DTSC @ \$50,000; RAW addendum at \$15,00; DTSC VCA approximately \$30,000;

### **Task/Activity 4: Cleanup Implementation**

- i. Project Implementation
  - EPA-funded activities in this task will cover environmental contractor costs for implementing the approved RAW to ready the property for redevelopment. Excavation, transport, and testing is for the remaining stockpile. Use restriction and institutional controls are applied to the target area for the southern new mill. This work will be conducted with applicable state and federal agencies. Tasks:
    - Excavation of approximately 1,600 cubic yards and removal to a permitted facility
    - Confirmation Sampling in areas where soil is removed in accordance with the final RAW
    - Implementation of institutional controls/use restriction- Soil Management Plan; Survey; Deed
- ii. Anticipated Schedule: *Start:* Sept. 2024      *Completion:* Sept. 2026
- iii. Task Activity Leads: QEP & Subconsultant
- iv. Outputs: **Final cleanup of the former Box Factory;** Subsequent reports on cleanup activities and suitability of development on-site; City, Grant Administrator, and QEP will track these developments and monitor so no unapproved developments or changes will occur to the site.
- v. Budget: A total of \$430,000 is budgeted for this task including confirmation samples, safety equipment, soil loading, transport and disposal \$350,000; RACR, Soil Management Plan and any finalized planning documents \$50,000; plus, the cost estimate for survey and use restriction at \$30,000;

### 3.c. Cost Estimates

A detailed cost estimate is provided under each task in section 3.b.v. above. Both the Box Factory and Dump target areas occur within the same 40-acre parcel. The land use restrictions and institutional controls will be applied upon the entire parcel (single deed) and were not separated.

Budget Categories		Project Tasks (\$)				Total
		Project Management and Reporting	Community Outreach	Cleanup Planning	Cleanup Implementation	
Direct Costs	Personnel	\$30,000	\$12,750	\$0	\$0	\$42,750
	Fringe Benefits	\$0	\$0	\$0	\$0	\$0
	Travel	\$6,000	\$4,000	\$0	\$0	\$10,000
	Equipment	\$0	\$0	\$0	\$0	\$0
	Supplies	\$3,000	\$4,000	\$0	\$0	\$7,000
	Contractual	\$28,900	\$29,750	\$95,000	\$430,000	\$583,650
	Other	\$0	\$0	\$0	\$0	\$0
<b>Direct Costs</b>		<b>\$67,900</b>	<b>\$50,500</b>	<b>\$95,000</b>	<b>\$430,000</b>	<b>\$643,400</b>
<b>Indirect Costs</b>		<b>\$6,790</b>	<b>\$5,050</b>	<b>\$9,500</b>	<b>\$43,000</b>	<b>\$64,340</b>
<b>Total Budget</b>		<b>\$74,690</b>	<b>\$55,550</b>	<b>\$104,500</b>	<b>\$473,000</b>	<b>\$707,740</b>

### 3.d Measuring Environmental Results

Grant administrators procured by the City will have demonstrated expertise in overall grant management services including but not limited to, routine audits, financial tracking systems, and policies for reporting. Moreover, contracts for procured firms are written ensure environmental cleanup results are achieved through a Master Service Agreement whereby consultants provide a scope of work, detailed cost estimate, and timeline for completion of each tasks. The City will utilize existing accounting systems to track grant funds. The “outputs” of the grant will be measured by total cleanup conducted (cubic yards of contaminated soil removed), completed reporting requirements, concurrence reports from oversight agencies, and level of community involvement. At the completion of this project the amount of land set aside for greenway and trail miles may be used for future accomplishments and funding leveraged. The outcomes and outputs of the grant will be tracked by City staff that has experience working on grants with diverse agencies.

## **4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE**

### **4.a. Programmatic Capability**

#### **4.a.i. Organizational Structure & ii. Description of Key Staff**

The City of Mt. Shasta is governed by a five-member, elected city council. The council is active and engaged in all aspects of city government, including the existing brownfields program. Todd Juhasz, City Manager, and Muriel Howarth-Terrell, Public Finance Director will oversee the management system that will be in place to facilitate the successful completion of the Brownfields cleanup program on behalf of the City of Mt. Shasta. Several years of experience managing EPA cleanup and similar grants give this staff great programmatic capacity. The City will procure a consultant to assist the Finance Director, in programmatic expertise, and will utilize existing City accounting systems to track grant funds. The City Public Works staff has been HAZWOPER certified and was able to assist under the supervision of a QEP in the 2022 cleanup effort to bolster cost saving measures and success of the grant.

The experience gained from the ongoing work with the EPA brownfields program in Mt. Shasta has built a high level of knowledge and expertise with staff and contractors. Three separate brownfields projects ongoing in the City have given the City a depth of understanding of the financial and contractual demands of these grants and will create efficiencies in this next project due to knowledge of the program, built-in partnerships, and established basic cleanup plans. These grants have fostered strong community organization and connections to the public via successful outreach and communication.

#### **4.a.iii. Acquiring Additional Resources**

The City plans to procure a sub-consultant and environmental contractors (QEP) using EPA procurement guidelines to add the necessary capacity to facilitate the project. The sub-consultant firm selected will provide a third-party opinion to the discussions and represent the City during coordination meetings with the regulatory authority and QEP. Moreover, the firm selected will be required to have brownfields management experience in the region and experience managing EPA cleanup grants. The QEP will be solicited using an RFQ process and will need to be able to complete both planning and implementation tasks to seamlessly complete the project.

### **4.b. Past Performance and Accomplishments**

#### **4.b.i Currently Has and Previously Received an EPA Brownfield Grant**

The City of Mt. Shasta has been the recipient of multiple brownfields-related grants, most recently a Brownfields Cleanup Grants in: 2019 - \$500,000 for the New Mill Box Factory, 2016 - \$240,000 Old Mill – Central Area, and a pilot Multi-purpose grant (2012-2016 - \$440,000). These grants have completed assessment of the entire Landing and prepare it for cleanup and redevelopment.

Implementation of the 2019 New Mill Cleanup grant is underway. Accomplishments to date include: initial soil sampling, planning work, and some excavation work has been completed with expended funds totaling: \$417,265. The remaining \$82,735 funds will be utilized to complete the work through the end of the fiscal year and include final reporting.

The 2016 Old Mill Cleanup grant is on track to meet all its accomplishments. Cleanup implementation was completed September 2022, including the entire \$240,000 of expended funds. The final RACR and associated documents will be submitted by the end of the fiscal year. These accomplishments include RAW addenda, excavation, and removal of contaminated soils. The 2016 Cleanup grant completed the DTSC VCA amendment, completion of the planning documentation required (ABCA, RAW, etc.), excavation and some transportation.

The Multipurpose Assessment Grant was completed within the allocated budget with a one-year extension. Accomplishments under the 2012 Multi-purpose grant included Phase II assessments, ABCA, and RAW for the Landing at the Box Factory, Dump, and New Mill Equipment shed areas of the Landing. In addition to Phase II assessments, an ABCA, and RAW were completed. All of these grants demonstrate the city's ability to comply with timeliness for reporting, achieving grant deliverables, and fiscal responsibility.

## **APPENDIX I – THRESHOLD CRITERIA RESPONSE**

1. Applicant Eligibility: The City of Mt. Shasta is a general-purpose unit of local government, an incorporated City in the State of California.
2. Previously Awarded Cleanup Grant: The Landing is a 127-acre brownfield that hosted several uses over its 125 years of operation as a mill site. The targeted New Mill Southern Area has not received cleanup funding to date. More specifically, these areas include the former: Underground Storage Tank (UST), Above Ground Storage Tank (AST), Refuse Burner, and the Southern Log Deck. The equipment was removed with the mill closure, however a myriad of assessment grants, multipurpose grants, and adjacent site cleanup grants have contributed to the current site characterization.
3. Expenditure of Existing Multipurpose Grant Funds – The City of Mt. Shasta does not have an open EPA Brownfields Multipurpose Grant.
4. Site Ownership: The city of Mt. Shasta is the sole owner of The Landing site specified in this application and has owned the site for 29 years. The Landing is the rebranded name for the larger mixed-use development proposed. The Southern Dump Area is South of the Box Factory and Dump areas of the Landing. If awarded this cleanup grant, the City will maintain ownership throughout the life of this grant.
5. Basic Site Information
  - a. Name of the site: The Landing – New Mill Southern Area
  - b. Address: Approximately 2329 S. Mt. Shasta Blvd., Mt. Shasta, CA 96067
  - c. Site Size: The Landing is approximately 127-acre site split into several parcels. The targeted cleanup is on a single 40-acre parcel within the Landing.
6. Status and History of Contamination at the Site
  - a. The target area is contaminated by both petroleum and hazardous substances. Approximate remaining amounts include:
    - i. Mixed Diesel & Motor Oil (Petroleum) ~700 cu yards
    - ii. Pentachlorophenol (hazardous substance) ~900 cu yards
  - b. Operational History and Current Use(s): The site was first developed by the Pioneer Box Company in 1900. Lumber mill operations were reportedly conducted by several parties, most recently Roseburg Forest Products (RFP), at the site from 1900 until the late 1980's. Historic operations included 2 Mill Sites, a Box Factory, and log pond. The target areas for this cleanup is the southern New Mill area; comprised of former fuel storage tanks, refuse burner, and log deck areas that supported the mill. The property is fenced and there are no current uses with the exception of unsanctioned itinerant camping and unsanctioned recreational use of the site by hikers, bikers, and runners.
  - c. Environmental Concerns: Approximately 600 cubic yards of non-hazardous petroleum-impacted soil and 800 cubic yards of non-hazardous PCP-impacted soil has been excavated from areas of concern with DTSC oversight and remains stockpiled on the New Mill South site from prior cleanups. The stockpiles are placed on 6-mil visqueen plastic or a concrete pad and are covered with 6-mil visqueen plastic weighted with sandbags. TRC generated 600 cubic yards of stockpiled petroleum-impacted soil on the Site during excavation of the former equipment shed. Geocon generated 800 cubic yards of stockpiled PCP-impacted soil on the Site during expanded excavation north and west of the former dip tank. Moreover, a LUC is required on the Site where soil and/or groundwater meet the project cleanup goals but not standards for unrestricted use. The LUC will recognize that the proposed recreational and commercial/industrial land use is compatible and is acceptable from a health risk standpoint because the types of activities that site occupants will undertake on the Site should not cause them to be exposed to the COCs. It will state that unrestricted land uses (e.g., residential, schools, daycare, hospital, senior care, etc.) will not be allowed

on certain portions of the Site where COCs exceed residential screening levels. The LUC will also recognize that drilling for water, oil, and gas is prohibited.

d. Contamination is a result of over 100 years of timber operations, multiple owners, and lack of knowledge regarding contaminants during early operation (1890s-1980s). Contaminated subsurface soils are primarily concentrated in areas of historical site facilities: Burner, AST, UST. These will require Land Use Covenant Restriction for commercial/industrial use. Moreover, contaminated mixed petroleum and hazardous substances from adjacent cleanup efforts remain tarped and stockpiled onsite.

7. **Brownfield Site Definition**

a. The site is not listed on the National Priorities List

b. The site is not subject to unilateral administrative orders, court orders, administrative orders on consent, nor judicial decrees issued to or entered into by parties under CERCLA

c. The site is not subject to jurisdiction, custody, or control of the United States government.

8. **Environmental Assessment Required for Cleanup Proposals:** A Phase II site assessment report has been completed for this site prior to submission. Several assessments have been completed, including 1) 1998 and 2005 EPA Targeted Site Assessments analyzing soil and groundwater for petroleum hydrocarbons, volatile organic compounds, dioxins/furans, and metals; 2) 2007 DTSC Targeted Site Investigation Phase II Report analyzing PCB contamination at the Box Factory transformer; and 3) 2009 DTSC Targeted Site Investigation, 4) 2014 Phase II Environmental Site Assessment to fill in gaps, 5) 2015 DTSC Targeted Site Investigation Phase II Report analyzed the entire Old Mill, 6) 2016 Removal Action Workplan completed and approved, 7) 2016 CEQA completed and RAW implementation approved.

9. **Site Characterization**

a. The City is eligible to be enrolled in the California Department of Toxic Substance Control (DTSC) Voluntary Cleanup Agreement (VCA).

b. The City is enrolled in a VCA with DTSC; amended 2018.

c. The VCA indicates that there is a sufficient level of site characterization from the environmental site assessment performed to date for the last remediation work to begin on the site immediately.

10. **Enforcement or Other Actions:** There are no ongoing or anticipated environmental enforcement or other actions related to the brownfield site for which funding is sought. There are no inquiries, or orders from federal, state, or local government entities that the applicant is aware of regarding the responsibility of any party (including the applicant) for the contamination, or hazardous substances at the site, including any liens.

11. **Sites Requiring a Property-Specific Determination:** No specific determination required.

12. **Threshold Criteria Related to CERCLA/Petroleum Liability:**

a. CERCLA §107 Liability: The City of Mt. Shasta is not liable for contamination at the site under CERCLA §107.

i. Exemptions to CERCLA Liability – ii.(1) Publicly Owned Brownfield Site Acquired Prior to January 11, 2002

ii. How the Property was Acquired: Deeded by Roseburg Forest Products to City of Mt. Shasta

iii. Date of Acquisition 1989

iv. Timing and/or Contribution Toward Hazardous Substance Disposal: All disposal of hazardous substance at the site occurred before the acquisition of the property and the City of Mt. Shasta did not cause or contribute to any release of hazardous substances at the site. The City of Mt. Shasta has not

arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.

v. Pre-Purchase Inquiry: 1988

- Preliminary assessments were conducted, and a preliminary clean-up plan was approved by the City of Mt. Shasta prior to deed transfer. Clean up plan included dismantling and removal of all structures and storage tanks by Roseburg Forest Products. Specific details regarding assessment types and performers is not known at this time.

vi. Post-Acquisition Uses: No current official use. Intermittent unsanctioned use of the site by hikers/bikers and for other recreational purposes. Also occasional intermittent unsanctioned use as an itinerant/homeless camp.

vii. Continuing Obligations: No current methods are being employed to stop current releases and/or prevent any future releases. Police monitor the site to limit exposure to individuals on the property. The City of Mt. Shasta confirms its commitment to:

- Comply with all land-use restrictions and institutional controls;
- Assist and cooperate with those performing the cleanup and provide access to the property;
- Comply with all informational requests and administrative subpoenas that have or may be issued in connection with the property; and
- Provide all legally required notices.

b. Property Ownership Eligibility – Petroleum Sites: Not applicable

13. Cleanup Authority and Oversight Structures

a. As demonstrated in previous grants, the City of Mt. Shasta plans to renew the Voluntary Cleanup Agreement as recommended by the State oversight program; through the California Department of Toxic Substance Control (DTSC). The experience gained from the ongoing work with EPA brownfields program in Mt. Shasta has built a high level of knowledge and expertise with staff and contractors. The City will consult with EPA, DTSC, and the Center for Creative Land Recycling (CCLR) for technical assistance when needed. The City also plans to obtain additional technical expertise by working with a subrecipient experienced in the management of Brownfield Grants and with Environmental Contractors that have knowledge on the conduct of cleanup activities. Procurement as documented in previous and current grants demonstrates the City is fully capable of meeting Good Faith practices, including 2CFR 200.317-326.

b. No additional access to neighboring properties will be necessary for this cleanup plan and the distance from neighboring residential areas is so large minimal impact is expected from cleanup activities at all.

14. Community Notification: The City of Mt. Shasta provided public notification of its intent to apply for Cleanup Grants with the EPA Brownfields Grant program on November 2nd, 2022 in the Mt. Shasta Herald and online. During the regularly scheduled City Council Meeting public comments were received on November 14, 2022.

a. **Draft ABCA**: The Landing - New Mill Southern is attached.

b. **Community Notification Ad**: The ABCA and grant application were available via the ongoing [www.thelandingmountshasta.com](http://www.thelandingmountshasta.com) website and a local repository, The Mt. Shasta City Hall at 305 Mt. Shasta Blvd, Mt. Shasta, CA 96067. Public feedback was obtained and responded to prior to clean-up application submission.

c. Public Meeting: The Public meeting occurred during a regularly scheduled City Council Meeting as its own agenda item. Public feedback was obtained and responded to prior to clean-up application.



d. Submission of Community Notification Documents

- i. The Public Hearing Notification, Council Meeting Agenda, Draft Meeting Minutes, and a list of questions and responses are attached to this proposal. Comments were also collected online and are attached.

15. Contractors and Named Subrecipients: The city intends to procure these services if the grant is awarded.

ATTACH DOCUMENTS BELOW

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## **APPENDIX II –ADDITIONAL ATTACHMENTS**

This section has been incorporated to the draft application available for public review and comment to acknowledge the additional attachments for this cleanup application.

In addition to the Narrative Information Sheet, Cleanup Narrative, and Threshold Criteria within this document, the City will have the following attachments:

1. ABCA – Alternatives for Brownfield Cleanup Analysis
2. Environmental Phase 2 for the Landing – New Mill South
3. DTSC Letter - DTSC fully supports the City's application and willingness to provide regulatory oversight. This letter will be added to the application and available on the City website once acquired.
4. Community Notification documents including newspaper, landing website screenshot, and comments received and responses

These materials will be available at the City Hall and digitally online at: [thelanding.com](http://thelanding.com)