

June 20, 2022

Mr. Steve Lazar, Senior Planner  
Humboldt County Planning and Building Department  
3015 H Street  
Eureka, CA 95501

Re: Initial Study and Proposed Mitigated Negative Declaration for Royal Gold Soil Operation, Case Number PLN-2021-17077, 1619 Glendale Drive, Arcata

Dear Mr. Lazar,

Thank you for the opportunity to comment on the Subject IS and Proposed MND. I do appreciate the value that Royal Gold brings to Glendale, including the jobs they provide. I also appreciate their efforts in working with the agencies to bring their project into compliance. However, I do have some concerns with the proposed MND.

#### Streams flowing into Hall Creek

I am very concerned about the treatment in the documents of the stream that borders the eastern edge of the project site as well as the one that is just to the south. These streams are referred to as “drainages” or “drainage ditches” in the document. But before the lumber mills began operations in the 1950s, these were functioning streams (former Glendale residents told stories of this), and they do have some remaining stream functionality and support aquatic species.

I do understand the Baseline concept in CEQA. However, even though the baseline for this project is a state of degraded and ditched streams, these streams do still provide important spring and summer water flow to Hall Creek, where multiple aquatic species (including Coho) are present. In fact, this late water flow is likely important to the survival of young Coho in Hall Creek. Therefore, clean water to these streams and to Hall Creek is of utmost importance.

The fact that these streams have been altered and degraded should afford them more protection, not less. In the big picture of healthy watersheds and restoring our Coho streams, we should be protecting all streams, and improving degraded ones where we can. Further encroachment of SMAs does not support this goal. I would like to see better protection of this stream in the MND, including respecting the SMAs.

Some of the SMA encroachments proposed have already been done on the site without permits. So I'm wondering why would we allow further encroachment? For instance, it appears that the applicant had already encroached on the SMA on the west side of the stream on the eastern border by using these areas for

storage (see Site Plan with Baseline Year (2009) SMAs, Figure 12). Could these SMAs be restored to better help protect the aquatic species the stream protects?

And how does the Riparian Enhancement Area 1 on the western side of the project site mitigate for previously encroached SMAs for the stream on the eastern side? I'm not sure what a good mitigation would be at this point, other than undoing the paving and storage that has already taken place, but I am disappointed that the past encroachment has further degraded any functionality left of this stream.

#### Site contamination and soil excavation

The project site is contaminated with Pentachlorophenol and dioxins in the soil and in the groundwater from previous lumber mill activities. In addition, dioxins were recently found (February 2021) in stormwater samples on the project site near the concrete cap, as well as off-site in the above referenced stream where it flows to the south of Glendale Drive (see SHN Surface Water Sample Results letter to DTSC, dated May 17, 2021). Everything possible must be done to keep contaminants from getting off-site and into the streams that flow into Hall Creek and eventually into Mad River, which supplies most of Humboldt County's drinking water. Much of this task is overseen by the DTSC, but it is also up to the County and Royal Gold to implement practices that help prevent contamination from moving off-site.

The increased soil testing for contaminants proposed in the MND is a good thing, and I am happy to see it. But if contaminated soil is found in pre-construction site characterization samples, how much of the soil will be removed and stockpiled? The MND needs to state how the applicant will test for the entirety of soil contamination (not just at initial sample core), digging out the contaminated soil, and re-testing horizontally out from the initial test, as well as vertically below the test sample to determine the total extent of the contaminated soil, prior to any building of detention basins or other features of the plan.

In addition, if contaminated soil is found in an area designated for wetland mitigation, how will the plan compensate for the area of lost mitigation? Also, if contamination is found in an area that is planned for a stormwater detention basin, where will a new detention basin be located? Detention basins must not be built on contaminated soil, to keep this contamination out of the streams. This must be addressed in the MND.

Sincerely,

Linda Miller  
Glendale resident