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July 19, 2022

County of Humboldt Planning Commission
825 5th Street
Eureka, CA 95521

Subject: Royal Gold Use Permit for Soil Manufacturing
Record Number PLN-2021-1707, APN: 516-101-008

Dear Commissioners:

I am writing as a concerned citizen to respectfully request that Item E-3 on your July 21, 2022 consent agenda be pulled and addressed at your July 21st meeting. Serving on the Humboldt Bay Municipal Water District's (HBMWD) board has opened my eyes to this potential threat to our regional water supply. In my opinion, this application should be denied. The project site is severely contaminated with hazardous carcinogenic chemicals. Former operators of the old McNamara and Peepe (M&P) lumber mill and others left toxic wood preservative chemical contamination in the soil and groundwater on-site. These toxic materials were left behind when prior owners entered bankruptcy. This orphaned contaminated site was taken over for remediation by the State of California Department of Toxic Substances Control (DTSC).

More than 30 years ago, DTSC placed a concrete cap over the "dip tank" area, where the worst of the contamination was known to exist on the M&P site. Presently, while DTSC is aware that their cap has failed, and that contamination has spread to neighboring water wells and surface waters tributary to Hall Creek, their response to this potential threat to public health is disappointing. Tributaries from the Royal Gold properties flow directly to Hall Creek, and then into the Mad River. Hall Creek enters the river less than a mile upstream of HBMWD's first intake well. Royal Gold's past unpermitted ground disturbing activities at this site are of grave concern because they have apparently remobilized contaminants. Recently contaminants were documented in surface waters upslope of the cap, indicating that the contamination on the Royal Gold properties has not been adequately delineated or remediated.

Mobilized contamination from Royal Gold has the potential to further spread contamination in surface and ground water downstream toward HBMWD's intake wells at Essex on the Mad River. Further site developments, and most especially ground-disturbing activities, should be expressly prohibited at Royal Gold until the contamination has been remediated and the threat to public health mitigated. Royal Gold, as a condition of approval, should be required to promptly assess and address impacts of their unpermitted ground disturbing activities on the site contamination.

As know, HBMWD supplies high quality drinking water to approximately 80,000 Humboldt County residents and businesses. HBMWD water is also consumed by county residents and visitors who do not reside within the service area but visit and use water. Contaminants of concern have been shown to have mobilized, with a potential to reach the river and significantly impact fish and wildlife in the river, and more importantly, the intake wells and drinking water supplies for many, if not most residents and visitors in Humboldt County.

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Please pull this item from the consent calendar and deny this use permit application. Please require the applicant to promptly address the potential mobilization of toxic contamination by their recent unpermitted ground-disturbing activities. If you can, please condition future approvals for new development on successful remediation of the contamination at this property.

I appreciate your kind attention to this matter. While the contamination remains in place, and until it is successfully remediated, all ground disturbing activities, and new developments should be avoided.

Thank You Sincerely,

David N. Lindberg

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