



April 26, 2019

Caitlin Castellano
Humboldt County Planning & Building Department
3015 H Street
Eureka, CA 95501

Re: Initial Study/Mitigated Negative Declaration (IS/MND) for Glendale Cannabis Facility (SCH No. 2019049021)

Dear Ms. Castellano:

Thank you for providing the California Department of Food and Agriculture (CDFA) CalCannabis Cultivation Licensing Division (CalCannabis) the opportunity to comment on the Initial Study/Mitigated Negative Declaration (IS/MND) prepared by Humboldt County for the proposed Glendale Cannabis Facility Project (Proposed Project).

CDFA has jurisdiction over the issuance of licenses to cultivate, propagate and process commercial cannabis in California. CDFA issues licenses to outdoor, indoor, and mixed-light cannabis cultivators, cannabis nurseries and cannabis processor facilities, where the local jurisdiction authorizes these activities. (Bus. & Prof. Code, § 26012, subd. (a)(2).) All commercial cannabis cultivation within the California requires a cultivation license from CDFA. For a complete list of all license requirements contained in the CalCannabis Licensing Program regulations, please visit: [https://static.cdfa.ca.gov/MCCP/document/CDFA%20Final%20Regulation%20Text 01162019 Clean.pdf](https://static.cdfa.ca.gov/MCCP/document/CDFA%20Final%20Regulation%20Text%2001162019%20Clean.pdf).

CDFA certified a Programmatic Environmental Impact Report (PEIR) for its cannabis licensing activities on November 13, 2017. The PEIR can be found at the following link: <https://www.cdfa.ca.gov/calcannabis/PEIR.html>. The PEIR provided an evaluation at a statewide level of the types of impacts expected to be caused by cannabis cultivation, including the cumulative impacts that would be expected under the CalCannabis Cultivation Licensing Program.

The PEIR did not consider site-specific, impacts that could result from individual cultivation operations seeking licensure by the State. The PEIR did, however, provide



a Tiering Checklist (Appendix J), and Lead Agencies are encouraged to use the Tiering Checklist as a first step in determining which California Environmental Quality Act (CEQA) topics were determined by CDFA to be most appropriately addressed by local jurisdictions. On December 28, 2018, the Governor's Office of Planning and Research issued revised CEQA Guidelines (14 Cal. Code of Regs. §15000 et. seq.) including a revised Appendix G checklist. These revised Guidelines include some reorganization intended to reduce redundancies, but also incorporate changes resulting from legislation and case law since the prior update. The updated Appendix G CEQA Checklist should be used in preparing all CEQA documents. A copy of the new Appendix G checklist can be found at: https://www.califaep.org/index.php?option=com_content&view=article&id=111&Itemid=258.

If Humboldt County issues a permit for the Proposed Project pursuant to its cannabis ordinance and an application is submitted to CDFA, the agency will conduct an independent review of the application, including the CEQA compliance document provided. If CalCannabis determines that the CEQA document is adequate for its use, CalCannabis will act as a Responsible Agency using that document to comply with CEQA for its issuance of the license. If CDFA determines that the CEQA document is not adequate for its use, CDFA may choose to act as a Lead Agency and to prepare a separate CEQA document for the project, as appropriate under CEQA Guidelines Section 15096(e).

The following comments are provided to ensure CEQA documentation for the Proposed Project is sufficient to satisfy CDFA's obligations as a responsible agency under CEQA Guidelines Section 15096 related to its potential future action related to the issuance of a cultivation license for the Proposed Project.

CDFA requests that a copy of the IS/MND, revised to respond to the comments provided in this letter and a signed Notice of Determination be provided to the applicant, so the applicant can include them with the application package they submit to CDFA. This should apply not only to this project, but to all future CEQA documents related to cannabis cultivation applications in Humboldt County.

CDFA also requests that in the future, when the County files environmental documents with the State Clearinghouse, that they also send a pdf version of the document directly to CDFA. This would provide CDFA with more time to respond to comments, and would provide a more legible copy than the versions CDFA currently receives from

the State Clearinghouse. Documents can be sent to: Crystal D'Souza, staff counsel at: crystal.dsouza@cdfa.ca.gov.

General Comments

Public Agency Approvals and Permits

The IS/MND lists "Other Public Agencies Whose Approval is Required" in section 1.0 Introduction. (IS/MND, p. 7.) CDFFA has jurisdiction over the issuance of licenses to cultivate, propagate and process commercial cannabis in California. Procurement of a state annual cultivation license from CDFFA should be included on the list of required permits and approvals. In addition, this section should acknowledge that applicants are required to provide a final copy of proof of a lake and streambed alteration agreement issued by the California Department of Fish and Wildlife (CDFW) or written verification that an agreement is not needed. (Cal. Code Regs., tit. 3 § 8102(v). Lastly, the project description states that the Proposed Project would include manufacturing and distribution components. Manufacturing of cannabis products requires a state license from the California Department of Public Health's Manufactured Cannabis Safety Branch. Distribution of cannabis and/or cannabis products requires a state license from the Bureau of Cannabis Control. These agencies should also be included on the list.

CDFFA Regulations

The IS/MND analysis should acknowledge that CDFFA is responsible not only for licensing, but also for regulation of cannabis cultivation and enforcement as defined in the Medicinal and Adult Use Cannabis Regulation and Safety Act (MAUCRSA) and CDFFA regulations related to cannabis cultivation (Bus. & Prof. Code, §26102).

The IS/MND should include a summary of the relevant requirements for resource topics regulated by CDFFA, as well as the protections for resources provided by these regulations. In addition, the impact analysis for each of the following resource topics should consider the effects of state regulations on reducing the severity of impacts on the following topics, resulting from implementation of the Proposed Project:

- Aesthetics (See §8304(c); §8304(g).)
- Air Quality and Greenhouse Gas Emissions (See §8102(s); §8304(e); §8305; §8306.)
- Biological Resources (See §8102(w); §8102(dd); §8216; §8304(a-c); §8304(g).)

- Cultural Resources (See §8304(d).)
- Hazards and Hazardous Materials (See §8102(q); §8106(a)(3); §8304(f); §8307.)
- Hydrology and Water Quality (See §8102(p); §8102(v); §8102(w); §8102(dd); §8107(b); §8216; §8304(a and b); §8307.)
- Noise (See §8304(e); §8306.)
- Utilities and Service Systems (See §8102(s); §8108; §8308.)
- Energy (See §8102(s); §8305; §8306.)
- Cumulative Impacts (related to the above topics).

Specific Comments

Tribal Cultural Resources Significance Conclusions

In the Tribal Cultural Resources section of the IS/MND, the checkboxes indicate that impacts to Tribal Cultural Resources would be less than significant with mitigation. (IS/MND p. 62.) However, the text immediately following states that impacts to these resources would be less than significant although reference is made to the standard cultural resource mitigation measure (CUL-1). CDFA requests that the checklist be made consistent with the text of the IS/MND.

Conclusion

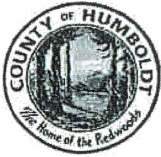
CalCannabis appreciates the opportunity to provide comments on the IS/MND for the Proposed Project. If you have any questions about our comments or wish to discuss them, please contact Kevin Ponce, Senior Environmental Scientist, at (916) 263-0801 or via e-mail at kevin.ponce@cdfa.ca.gov.

Sincerely,



For
Lindsay Rains
Licensing Program Manager

Cc:



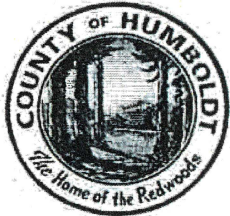
Planning and Building Department
 Planning Division
 COUNTY OF HUMBOLDT
 3015 H Street
 Eureka CA 95501

RETURN SERVICE REQUESTED

Important Public Hearing Notice



WHITMAN LAVELLE & LEE CPRS
 1789 GLENDALE DR
 MCKINLEYVILLE CA 95519-9210



COUNTY OF HUMBOLDT PLANNING AND BUILDING DEPARTMENT

NOTICE OF INTENT TO ADOPT A MITIGATED NEGATIVE DECLARATION

NOTICE IS HEREBY GIVEN that the County of Humboldt, as Lead Agency, in accordance with the State California Environmental Quality Act (CEQA) Guidelines intends to adopt a Mitigated Negative Declaration (finding of no significant adverse environmental effect) on the project described below. **This notification is to advise you that the Humboldt County Planning and Building Department will receive public comments on the proposed Mitigated Negative Declaration from April 4, 2019 to May 3, 2019.**

PROJECT TITLE: Glendale Cannabis Facility

APPLICANT: Michael Brosgart & Arielle Brosgart

My Name is Lavelle Whitman

I am extremely opposed to this!

I bought my house here in 1985, had a good neighbor till she sold her place. a young man bought it and immediately turned it into a large drug ~~over~~ ^{over}

(cont)

PROJECT DESCRIPTION: The project on parcel 516-111-064 is for a multi-use facility and consists of six separate applications: 13312, 13319, 13328, 13339, 13346 and 13360. Water and septic is provided to the site by Glendale-Fieldbrook Community Service District. 22 employees total are expected for operations. Power is provided by PGE. The project will require 32 parking spaces, two loading spaces, and two designated disabled parking spaces. LEAD APP: Application 13312 is a Conditional Use Permit for 10,000 square feet (9,860 + 140 office) of indoor cannabis cultivation. Cultivation will take place on the second floor of building "A". Three employees are expected for operations. Application 13319 is a Special Permit for a proposed 3,120 square foot (2,980 + 140 office) volatile manufacturing facility. The manufacturing facility occupies building "B". Manufacturing will include CO2 extraction, hydrocarbon based solvents, and food grade ethanol. Products produced from the manufacturing process include edible, topical, concentrate, and drink products for medical and adult use cannabis uses. Three employees are associated with this operation. Application 13328 is a Special Permit for a 4,440 square foot (4,300 + 140 office) non-volatile manufacturing facility. The manufacturing facility will be located in building "C". Four employees are associated with this operation. Application 13339 is a Special Permit for a 2,226 (2,086 + 140 office) square foot distribution facility. The distribution facility is located at the northeast corner of building "C". Three employees are associated with this operation. Application 13346 is a Special Permit for medical and adult use cannabis processing facilities totaling 9,000 square feet (8,860 + 140 office). The proposed processing facility located on the first floor of building "A" occupies 3,000 square feet, the proposed processing facility located on the second floor of building "A" occupies 1,600 square feet and the proposed processing facility located in building "C" occupies 4,400 square feet. Six employees are associated for this operation. Application 13360 is a Conditional Use Permit for a 6,710 (6,570 + 140 office) square foot wholesale nursery. The nursery is located in building "A". Four employees are associated with this operation.

PROJECT LOCATION: The project is located in the Blue Lake area, on the North side of Glendale Drive, approximately .12 miles West from the intersection of Swanson Lane and Glendale Drive, on the property known as 1691 Glendale Drive.

ADDRESS WHERE COPIES OF THE PROPOSED MITIGATED NEGATIVE DECLARATION AND INITIAL STUDY ARE AVAILBLE FOR REVIEW AND WHERE COMMENTS MAY BE MAILED:

Humboldt County Planning and Building Department
3015 H Street
Eureka, CA 95501

The project and the proposed Mitigated Negative Declaration will be considered by the Humboldt County Planning Commission at the May 16, 2019 public hearing. A separate notice this hearing will be provided pursuant to Humboldt County Code 312-8 et seq.

Specific questions regarding the proposed project and the draft Mitigated Negative Declaration may be directed to Caitlin Castellano, Planner at (707) 445-7541.

April 5, 2019 operation, ~~dog~~ larger dogs, people going in and out all hours of the day + night, just beside my fence, east of me. Finally after a few years was posted. The person that bought the property continued on big time! I have also had drug operations behind my house and on the west side of my house. Needless to say I am tired of it all. This project will be about a tenth of a mile from my house. "a lot of big concerns will name them at the meeting."
Laelle Whitman

Water + Air Contaminations
property devaluations
devaluation
increased traffic on
Glendale DR.

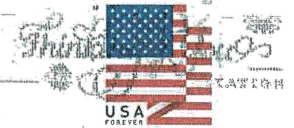
Change of increased
crime

Ladelle Whitman
1789 Glendale DR.
McKinleyville, Ca.
95519

L. Whitman
1789 Glendale Dr.
McKinleyville Ca.
95519

EUREKA CA 955

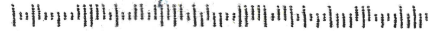
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Humboldt County
Planning Division

Planning & Building Dept.
Planning Division
County of Humboldt
3015 H Street
Eureka, Ca. 95501

95501-441502



James A. Rydelius
190 Laurelwood Drive
McKinleyville, California 95519

May 1, 2019

Humboldt County Planning & Building Department
3015 H Street
Eureka, California 95501

Re: Glendale Cannabis Facility. Conditional Use Permits: APN 516-111-064

Dear Commissioners:

I'm a nearby neighbor of the subject proposed project area with no way to get to or from my residence without passing through the proposed project area.

I note from a map I was shown of the so-called Glendale area that the subject parcel (APN 516-111-064) is highlighted in a light pink color. I note also that there are several other parcels also highlighted in a light pink (516-161-005, 516-101-052, 516-151-003, 516-151-004, 516-151-019). Is the intent to also involve these parcels in the growing and/or production of cannabis products? I'd really like to know now rather than later because, should this first conditional use permit application be approved, any concern I may express in the future about any of the other parcels highlighted in pink or, for that matter, any of the many other parcels in the Glendale area not currently highlighted in pink will just be that much more easily ignored.

By the way, my concerns at the moment are as follows:

As I mentioned above, Glendale Drive is the route I must travel every time I leave or return to my residence and I've been doing so since 1975, some 44 years. It is now and always has been a pleasant and easy drive with very little traffic as well as with many friendly neighbors who always wave as I drive by. I've also always or until very recently felt at complete ease to stop at any of my friendly neighbors for a friendly visit. A couple of rather recently established facilities, one along Glendale Drive and one along Liscom Hill Road, leave me quite ill at ease in that, unlike all of the people along the way that I've know for so many years, these places are now surrounded by chain link fences with "no parking" signs as well as "private property" and "keep out" signs.

Will any of the proposed cannabis operations further restrict where I am allowed to stop if I wish to visit with my friends? To what extent will all of this pleasantry be interrupted? Will the inevitable increased traffic make it hazardous for me to stop

along side the road to have these friendly chats? Will people rush through locked chain link fence gates enclosing these new facilities threatening me if I were to stop? As I mentioned above, I already see such fences and gates with signs warning me not to stop. I'm not suggesting that either of these two rather newly established facilities have anything to do with cannabis but, if they do and if the people to be involved in the new cannabis business proposed for APN 516-151-064 behave as do the people involved with those facilities I've already had enough!

Finally, I doubt or, at least hope, that any noise or odors that may be emitted by cannabis growing or processing along Glendale Drive will reach my residence but I worry for my friends who live along Glendale Drive. I'm quite sure that all of them chose to live a rural life. Had they preferred a city, town or industrial environment in which to live, just as would I, they most certainly would have chosen such places to live. Therefore, please, whatever you do, consider how such noises, odors and/or the behavior of people involved may adversely personally impact my friends and/or the values of their properties.

Thank you for your consideration of my concerns.

Sincerely,

James A. Rydelius

CYNTHIA S. TROBITZ-THOMAS

585 Glendale Drive • McKinleyville, CA 95519

Home: 707-822-5025 • Cell: 707-502-7248 • Email: ctrobitz1@gmail.com

May 2, 2019

Humboldt County Planning Commission
3015 H Street
Eureka, CA 95501

RE: Glendale Cannabis Facility. Conditional Use Permits and Special Permits: APN 516-111-064

Dear Commissioners:

As life-long residents of the Glendale Area, we are writing in regards to the above referenced application and its location in the community of Glendale. We offer the following, comments, concerns and questions for your consideration:

- ✓ What is the impact of the odor generated by this facility and others proposed or existing? The approved site at 1220 Glendale Drive, across the road from trailer park has three hoop houses and is getting ready to grow. The fences and razor wire are up. I wonder how many residents would have chosen to live there knowing this was in their future. The smell of skunk is not pleasant, even in short whiffs, which is why we go to great lengths to mix up an anti-skunk rinse when our pets get sprayed!!!
- ✓ Circulation fans operating 24/7 will create noise pollution for the adjacent residents.
- ✓ What will be the impact of nighttime lighting on the Glendale Community? Currently residents can enjoy viewing the evening sky without light interference and relax in their home without dark curtains to block the light.
- ✓ Glendale Drive is narrow, making it currently difficult for pedestrians and bicyclists to use safely and provides a challenge when meeting a car and truck going in alternate directions on a curve. In addition, Glendale is now home to a herd of nearly 100 Roosevelt Elk. The Elk routinely cross Glendale Drive to enter the McAdams Ranch, which is adjacent to a curve with poor visibility. There have been several near misses!
- ✓ What impact will cannabis facilities have on residential property values? My family has lived in the Glendale Community since the 1950's. We have restored and maintained Dr. Isaac Minor's home, built in 1906. It has been our desire to continue to do so, but if we have to move, will the value of our home be negatively impacted?
- ✓ Glendale now has a significant amount of vacant property, which provides an excellent opportunity to receive input from the residents and property owners through the development and approval of a Glendale Community Plan, which was approved by the Board in December 2018 and has yet to be scheduled. With the shortage of housing in Humboldt County, there may be opportunities to develop first-time homeownership on these vacant underutilized sites?

CYNTHIA S. TROBITZ-THOMAS

585 Glendale Drive • McKinleyville, CA 95519

Home: 707-822-5025 • Cell: 707-502-7248 • Email: ctrobitz1@gmail.com

Property and business owners deserve an opportunity to have input regarding the future of their investments and community. Please honor the Board of Supervisors' moratorium on aligning zoning cases in Glendale/Blue Lake with the approved GPU, until such time as this neighborhood has received the promised planning staff support and time to conduct and complete a Glendale Community Plan.

Thank you in advance for your consideration.

Cindy Trobitz-Thomas & Vince Thomas
2145 Glendale Drive & 585 Glendale Drive

Dr. David Trobitz & Heather Trobitz
2101 Glendale Drive

Cc: John Ford, Director of Planning and Building Department; Elizabeth Schwartz, Sr. Planner; Michael Richards, Sr. Planner; Rox Bohn; Estelle Fennell; Mike Wilson; Virginia Bass; Steve Madrone

Castellano, Caitlin

From: Barbara Russell <bjrhumboldt@gmail.com>
Sent: Thursday, May 02, 2019 11:56 AM
To: Wilson, Mike; Fennell, Estelle; Madrone, Steve; Bass, Virginia; Bohn, Rex; Castellano, Caitlin; Planning Clerk
Subject: Cannabis Factory's Future in Glendale

May 02, 2019

Dear Humboldt County Planning Commission, Supervisors, and Caitlin Castellano,

I live in Glendale. My neighbors and I are concerned about the impact the Cannabis Factories will have in our community.

You will receive numerous letters from the citizens of my community and as you will read the community and I feel whole heartedly that NO Conditional Use or Special Permits should be issued until AFTER our Glendale/Fieldbrook and Glendale/Blue Lake Community Plans are completed.

It is important to us, as I am sure it is important to you, to have a high green standard for the factory buildings coming Glendale's way. The zoning, overlays and standards for these buildings are very important, as we are a splendid mix of large lot residents, wildlife and industry, overlapping wonderfully. It is a delicate balance and these industries can add, not take away what we are working towards. The investors of these projects do not live in the Humboldt County area. We as a community are invested in the future of Glendale. When done right and with high green standards, these buildings can be tourist worthy and add to our economy.

My sincere thanks,

Barbara Russell
1901 Glendale Dr.
Mckinleyville,
Ca., 95519
707-825-0137

Castellano, Caitlin

From: Joseph Wilhelm <jwilhelm@meridianfineart.net>
Sent: Thursday, May 02, 2019 11:56 AM
To: Castellano, Caitlin
Subject: Proposed Glendale Cannabis Facility (Brosgart) MND
Attachments: Glendale Vision 04.pdf

Hi Caitlin,

Thank you for your help with information regarding the Brosgart project at "1691" Glendale Drive. There is growing community concern not just with Brosgart but for the cumulative impact of all the facilities being proposed. I am writing out of concern for these projects moving forward before our community plan is developed in regards to re-zoning.

I see the cumulative impact of water use as highly problematic considering our limited water infrastructure. Is this how HumCo wants to use this invaluable resource?

Additional cumulative impacts include increased traffic on an unsafe road (Glendale Drive), other concerns include so much cannabis development that our gateway to our Rural Residential areas are being overrun by an industry not permitted within school bus stops. By the way, where are our bus stops? Can they be so easily disregarded?

Back to water concerns, water is considerably more valuable than cannabis and it makes little sense for this particular parcel be anything but housing or commercial community services. This project at "1691" that's up for consideration is currently zoned as Unclassified which would allow for housing. When re-zoning occurs this parcel will be removed from the housing element while at the same time, a proposed facility across the street expects to have over a hundred employees. Maybe community services or apartments make better sense from a long term community planning aspect?

It is because of issues like this that HumCo delayed their proposed zoning changes in favor of community input. Maybe we need a moratorium for Glendale development where rezoning is an issue?

Every community thinks their place is special. I have a bias about my own community and I see a bigger picture too. I chose to live here because we have a sustainable water supply. That sustainable water supply is a rare feature in California and the entire Humboldt Bay relies on it.

Glendale serves the County better as a river protector. Many of our traditional industries are required to do a lot in regards to regulations intended to protect our water. For new development, extra protection as well as managing consumption is of importance for our security. Will the cumulative impact of all the proposed projects deplete our water infrastructure and if so, who will pay for upgrades? As it is, our water and sewer is crazy expensive - perhaps we need to consider a solution as part of the big picture?

The long-range planners through approval of County Supervisors have given us time to grapple with rezoning as it relates to the implementation of the general plan. We are set to have these community planning meetings later this fall. If this "Brosgart" Project is pushed through before then, then it will leave many community members wondering about our official vision from 2005 (expressed and collected when developing the HumCo GP and attached below).

My address for future mailing regarding the Glendale community is:

Joseph Wilhelm
PO Box 981
Blue Lake, CA 95525

Thank you,

Joseph Wilhelm

Glendale Vision Statement

Thirteen years ago, in regards to updating the Humboldt County General Plan, county planners met with local communities for their input. As a result, Glendale produced the following vision statement in 2005 looking forward to 2050:

“Glendale is a safe, clean community with balanced and well-designed residential, commercial and industrial development. Residents and business enjoy reliable public services, well-maintained and properly signed roads, bike paths and sidewalks. A central downtown and commercial area caters to residents and truckers alike. Through partnership with local educational centers, an industrial arts complex and faculty and student housing are well integrated into the community on former Brownfield sites. Residents and businesses enjoy their close proximity and easy access to the river and other recreational opportunities.”

When re-zoning, it's a good time to ask:

Is Glendale becoming its vision?

How will re-zoning guide and sustain Glendale's vision?

Glendale is a productive and important Humboldt County community. Let's make it better.

Claire McAdams
McAdams Lands LP
295 McAdams Road
McKinleyville, CA 95519
707.832.3181
May 2, 2019

Humboldt County Planning Commission
c/o Humboldt County Clerk of the Board
825 5th Street
Eureka, CA 95501

RE: APN 516-111-064 Conditional Use Permit Application

Dear Commissioners Bongio, Morris, Levy, Newman, O'Neill, McCavour, and Mitchell:

McAdams Lands LP and two other family partnerships own timber property north of Glendale Drive which was Isaac Minor's Glendale ranch in the late 19th century, and is now a sizeable working forest with residential structures. As a 4th generation owner of that forest property, and as a resident of what the Times-Standard calls "Outer Glendale", I am writing to ask that you honor the Board of Supervisors' moratorium on aligning zoning cases in Glendale/Blue Lake with the approved GPU, until such time as this neighborhood has received the promised planning staff support and (so far unspecified) time to conduct and complete a Glendale/Blue Lake Neighborhood Plan.

Our community did not have a chance to develop a neighborhood plan during the GPU process, so the Board of Supervisors promised to delay the current process of aligning zoning with the GPU, in order to give the neighborhood a chance to make a neighborhood plan.

They promised that the county planning staff would be allowed to work with us to create and complete the Glendale/Blue Lake neighborhood plan, in the months following December 2018. This process has not yet begun. I ask that the Planning Commission direct staff to assist with the neighborhood plan process immediately, and allow us to complete the neighborhood planning before the applications for conditional use permits of parcels identified as Cannabis Applicants in the Humboldt County Planning Department map of April 30, 2019 are allowed to go forward.

Glendale and its environs are part of a "Greater Blue Lake" community. The Murphy's Market on Glendale is the sole grocery for Blue Lake, and children living along Glendale Drive walk along Glendale Drive to attend school in Blue Lake. Adult and children alike ride their bikes along Glendale Drive and through Blue Lake and its surroundings. There are individual, social, religious, and cultural networks and institutions shared by Glendale and Blue Lake. Any future land use decisions would be best made within the context of a neighborhood plan for the Glendale/Blue Lake area as a whole.

The Glendale area has historically been a mix of industrial and residential uses. Those of us who are here expect to co-exist with some industrial land uses, but additional industrial operations need to be

designed to respect and add benefit, not harm, to the quality of life of those of us whose residences share the area. The Glendale/Blue Lake area has extraordinary dark night sky that should be protected from industrial light pollution. It has families who need quiet from industrial noise after traditional work hours, and air free of marijuana fumes. It has Coho salmon-bearing creeks undergoing habitat restoration, that could be harmed were an engineered system for cleansing industrial pollutants ever fail. My family's forestland is surrounded by residences, mainly of people who respect our property boundaries. In recent years, some (possibly unpermitted) marijuana grows sites along Glendale Drive have brought transients and unknown persons walking the same routes as schoolchildren and trespassing in our forestland. Vandalism of our front gates has occurred multiple times. We have surprised an intruder to our house in the last year. I hope that any new cannabis businesses in our neighborhood do not bring more crime, but I am skeptical. The neighborhood needs any new workforces to respect the lives and property of residents, though this cannot be enforced.

Glendale may not look like a community, but functions as one, and so needs and deserves protection from negative impacts of new industry. Please help our community meet the future as well as it can, by enabling the Glendale/Blue Lake area to conduct and complete a neighborhood plan before you take up any conditional use permits for cannabis businesses.

Thank you in advance for your consideration and the time/energy you give on behalf of Humboldt County and its future.

With respect,

Claire McAdams

Cc: John Ford, Director of Planning and Building Department; Elizabeth Schwartz, Sr. Planner; Michael Richards, Sr. Planner; Rox Bohn; Estelle Fennell; Mike Wilson; Virginia Bass; Steve Madrone

Comments on Initial Study and Mitigated Negative Declaration for Glendale Cannabis Facility, 1691 Glendale Drive, McKinleyville.

- Regarding 5.11 Land Use and Planning, b):
 - The MND does not take into consideration, nor does it mention, the fact that the Glendale Community developed a Vision Statement in 2005 as follows: *“Glendale is a safe, clean community with balanced and well-designed residential, commercial and industrial development. Residents and businesses enjoy reliable public services, well maintained and properly signed roads, bike paths and sidewalks. A central downtown and commercial area caters to residents and truckers alike. Through partnership with local educational centers, an industrial arts complex and faculty and student housing are well integrated into the community on former Brownfields sites. Residents and businesses enjoy their close proximity and easy access to the river and other recreational opportunities.”*
 - The proposed project does not do anything to make Glendale safer (e.g., proposed significant traffic increase), indeed, I believe it will make it more unsafe. It will put in a sidewalk, which is appreciated, but the increased traffic on Glendale Drive will impact the residential population, including pedestrians and children walking to and from school bus stops and Murphy’s Market, and the many recreational and commuter bicyclists on Glendale Drive. There is already a lot of industrial truck traffic on Glendale Drive, and the increased traffic from this project will make the road more unsafe.
 - In addition, the Glendale Community appreciates our local elk herd, which crosses Glendale Drive regularly. Increased traffic on this road could result in elk/vehicle collisions.
 - The MND does not take into account the planning effort currently underway to develop a Community Plan for the Glendale Community. Development of such plan is scheduled for later this year, where Community residents will have a say in how the Glendale area is zoned and developed in the future. We were promised that zoning changes to make zoning compatible with the 2017 General Plan would be put off until the people who live in Glendale could develop our plan. **We respectfully request that a moratorium be put in place for any project permitting or further CEQA analysis on any project (including this one) until we have an approved Community Plan.**
- Regarding 5.21 Mandatory Findings of Significance, b):
 - I strongly believe that the finding of “less than significant” is not appropriate, when an addition of 109-138 employees, an increase of 25% traffic on 299, and an increase of 1,000 vehicles on Glendale Drive are estimated for the Cumulative Projects (Table 2). This would be a *very significant* impact on the people who live and work in the Glendale area, especially anyone who drives, walks (including children), and bikes (this is a very popular route for recreational bicyclists as well as commuter bikes), in addition to the

increased noise and dust levels for anyone who lives on Glendale Drive. This increased traffic would certainly have an impact on the safety of our community and those passing through for work, school, errands, or recreation. This must be addressed with the stakeholders in this community prior to any of these projects being approved. Also, as no mitigation measures for traffic are proposed in MND, I would like to see what measures might be proposed for this significant traffic impact for the project at 1691 Glendale. Anything to improve the safety of existing foot, bicycle, and vehicle traffic would be beneficial on Glendale Drive.

- Regarding 5.4 Biological Resources:
 - I would like to advocate for the use of native plants in the landscaping for this project. The use of *regionally appropriate* native plants would decrease the need for irrigation, would attract and support native pollinators and birds, and would decrease the possibility of invasive plants escaping into nearby native habitats.

Thank you for considering my comments,
Sincerely,

Linda Miller
Liscom Hill Road
McKinleyville, CA 95519



May 1, 2019

Dear Sirs,

My name is May Wolf, I live at 1972 Glendale St, close to Blue Lake, and I'm writing about the Cannabis business they want to build on Glendale St. I live just half a block from there and I'm very much against this. My main concern is this is going to attract a lot of bad people coming into our neighborhood. I live in a quiet neighborhood where a lot of good people live, and this would destroy our neighborhood, and even scare a lot of people. I'm suggesting you keep it out of Glendale and find another place ^{or} _(over)

Thank you very much,

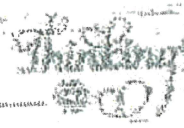
Sincerely
May Wolf



Mary Wolf
1772 Glendale Dr
McKinleyville, CA 95519-9210

EUREKA CA 955

02 MAY 2019 PM 1 L



Humboldt County Planning
& Building Department
3015 H. Street
Eureka, CA.

95501-440400



95501

Castellano, Caitlin

From: Doug Daly <dugdaly@gmail.com>
Sent: Thursday, May 16, 2019 6:15 PM
To: Castellano, Caitlin; Planning Clerk; Werner, Steve
Subject: Fwd: Glendale cannabis proposed facilities.
Attachments: Glendale Doug.docx

----- Forwarded message -----

From: Doug Daly <dugdaly@gmail.com>
Date: Thu, May 2, 2019 at 2:50 PM
Subject: Glendale cannabis proposed facilities
To: Vbass@co.humboldt.ca.us <Vbass@co.humboldt.ca.us>, efennell@co.humboldt.ca.us <efennell@co.humboldt.ca.us>, mike.wilson@co.humboldt.ca.us <mike.wilson@co.humboldt.ca.us>, rbohn@co.humboldt.ca.us <rbohn@co.humboldt.ca.us>, smadrone@co.humboldt.ca.us <smadrone@co.humboldt.ca.us>

May 2, 2019

Humboldt County Planning Commission:

I have been a resident and property owner in Glendale for over twenty years. It is a quiet community with great weather, a store, and a bowling alley. It is a place I can go in my backyard and see all the stars at night and the mountains in the daytime. Children ride bicycles or walk to the store and walk home with a popsicle.

Upon reading the initial study and mitigated negative declaration report for cannabis facilities in Glendale, it seems that the majority of the findings in all the categories state that these cannabis facilities would overwhelmingly have a) no impact, b) no significant impact, c) not any cumulative impact, d) less than significant impact. Apparently the only downside to the project is all the bothersome people who live in Glendale.

This document has been prepared by persons who are in full support of these projects. I would say that it was not prepared by any persons who live in the Glendale community and the opinions on the impact it would have are biased toward the proposed developments. The cumulative effect of all these projects in our backyard will be extremely significant. Anybody who takes an honest look at what is being proposed would say "not in my backyard" but seem to have no problem putting it in mine. This plan is a complete and utter opposite to the visions that the community had laid out in 2005. Who determined the levels of impact?

The plan says there will be an increase in traffic on Hwy 299 which would be about 1000 vehicles a day. It says this is in line with historic levels. The mills have been gone for fifteen years. It says there will be potentially significant and permanent increase in ambient noise levels, but the project would not generate noise greater than that of vehicle traffic in the streets. This 1000 vehicles a day going down Hwy 299 are all headed in and out of Glendale Drive, plus the noise from the facilities themselves seems to me to be extremely significant. Add to that the residents and children on bicycles, riding or walking down to the store and bowling alley who would at an extremely elevated risk of injury due to the increased traffic.

The study says the sheriff's department services on the sites may increase due to the proposed land use (Measure Z dollars now go to protect dope growers) but it will be less than significant impact. This proposed land use will attract a certain element of society who are deeply involved in the drug trade. I do not support this industry; marijuana is called dope for a reason, and I do not want these people or their product in my neighborhood. I do not want my children or grandchildren to walk out my front door and see or have their "odor receptors" assaulted by the stink of marijuana. Again, I say if you are honest with yourself, I have no doubt you would say you

don't want them in your backyard, either. There are lots of other places to put this crap that is not in a community like Glendale. For example, out in the business industrial park by the airport, or by Recology on the peninsula or the Orick former sawmill site. But don't destroy Glendale.

Some of these people applying for cannabis permits are from Southern California. Keep it down there, maybe in their backyards). The only thing that makes them want to do it here is the Grown in Humboldt County sticker, because you can grow the same crap in Colorado or Minnesota. I understand Humboldt County wants tax dollars, but some will come from the fish farm, or another legitimate, wholesome activity and not moving drug dealers and all the problems that come with it into our Glendale community.

As for air quality, I dealt with air quality when we had problems with Royal Gold. Humboldt County and NCUAQMD were absolutely no help in resolving our issues with airborne particulates and odors coming from Royal Gold properties even when we finally got them to come out and watch it happening. It took a lawsuit to get them to do what was necessary which was to cover their dirt piles.

What does Humboldt County plan to do to make sure these places are continuously operating within the guidelines and the laws?



HUMBOLDT BAY MUNICIPAL WATER DISTRICT

828 SEVENTH STREET, PO Box 95 • EUREKA, CALIFORNIA 95502-0095

OFFICE 707-443-5018 ESSEX 707-822-2918

FAX 707-443-5731 707-822-8245

EMAIL OFFICE@HBMWD.COM

Website: www.hbmwd.com

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MICHELLE FULLER, DIRECTOR

May 3, 2019

GENERAL MANAGER

JOHN FRIEDENBACH

Caitlin Castellano, Planner
Humboldt County Planning Department
3015 H Street
Eureka CA 95501

RE: Applicant: Michael Brosgart & Arielle Brosgart; APN: 516-111-064

Dear Ms. Caitlin Castellano,

I am writing on behalf of the Humboldt Bay Municipal Water District in regards to the above referenced application. Our District respectfully submits the following information for consideration in regards to the above referenced project.

Our District is opposed to industrial development with processes containing hydrocarbon based solvents immediately upstream and in close proximity to our source water intake infrastructure located in and along the Mad River for obvious health and safety reasons. Expanded heavy industrial hydrocarbon-based operations that have the potential to adversely affect the domestic drinking water supply for nearly two thirds of the population of Humboldt County should be denied or required to complete an extended CEQA process. It is questionable whether such a project qualifies for a CEQA Mitigated Negative Declaration.

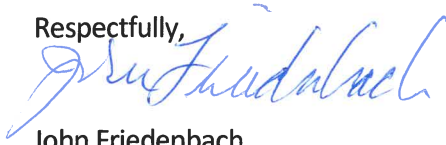
Our interest generally in this area involves the health and safety needs to protect and preserve the high-quality water source that is the Mad River and its underlying aquifers.

For the environmental review of this project, a CEQA Mitigated Negative Declaration does not address the following environmental impacts: 1) possible environmental impact to our public drinking water system for 88,000 residents of Humboldt County if a hazardous material release were to occur from the parcel from the manufacturing facility utilizing hydrocarbon based solvents activities; 2) consideration of the environmental impacts resulting from transporting hazardous materials to the site and hazardous waste from the site; 3) possible surface water impacts from surface water drainage off the parcel in such close proximity to the drinking water source for two thirds of the county's population.

We believe the project does not qualify for the Mitigated Negative Declaration under CEQA based on the above stated issues.

Thank you for your consideration of our submittal.

Respectfully,

A handwritten signature in blue ink, appearing to read "John Friedenbach". The signature is fluid and cursive, with a large initial "J" and "F".

John Friedenbach
General Manager

Cc: Leslie Walker, esq.



Planning and Building Department
Planning Division
COUNTY OF HUMBOLDT
3015 H Street
Eureka CA 95501

H.B.M.W.D. APR 15 2019

RETURN SERVICE REQUESTED

Important Public Hearing Notice



HUMBOLDT BAY MUNICIPAL WATER DISTRICT
PO BOX 95
EUREKA CA 95502-0095



COUNTY OF HUMBOLDT PLANNING AND BUILDING DEPARTMENT

NOTICE OF INTENT TO ADOPT A MITIGATED NEGATIVE DECLARATION

NOTICE IS HEREBY GIVEN that the County of Humboldt, as Lead Agency, in accordance with the State California Environmental Quality Act (CEQA) Guidelines intends to adopt a Mitigated Negative Declaration (finding of no significant adverse environmental effect) on the project described below. **This notification is to advise you that the Humboldt County Planning and Building Department will receive public comments on the proposed Mitigated Negative Declaration from April 4, 2019 to May 3, 2019.**

PROJECT TITLE: Glendale Cannabis Facility

APPLICANT: Michael Brosgart & Arielle Brosgart

PROJECT DESCRIPTION: The project on parcel 516-111-064 is for a multi-use facility and consists of six separate applications: 13312, 13319, 13328, 13339, 13346 and 13360. Water and septic is provided to the site by Glendale-Fieldbrook Community Service District. 22 employees total are expected for operations. Power is provided by PGE. The project will require 32 parking spaces, two loading spaces, and two designated disabled parking spaces. LEAD APP: Application 13312 is a Conditional Use Permit for 10,000 square feet (9,860 + 140 office) of indoor cannabis cultivation. Cultivation will take place on the second floor of building "A". Three employees are expected for operations. Application 13319 is a Special Permit for a proposed 3,120 square foot (2,980 + 140 office) volatile manufacturing facility. The manufacturing facility occupies building "B". Manufacturing will include CO2 extraction, hydrocarbon based solvents, and food grade ethanol. Products produced from the manufacturing process include edible, topical, concentrate, and drink products for medical and adult use cannabis uses. Three employees are associated with this operation. Application 13328 is a Special Permit for a 4,440 square foot (4,300 + 140 office) non-volatile manufacturing facility. The manufacturing facility will be located in building "C". Four employees are associated with this operation. Application 13339 is a Special Permit for a 2,226 (2,086 + 140 office) square foot distribution facility. The distribution facility is located at the northeast corner of building "C". Three employees are associated with this operation. Application 13346 is a Special Permit for medical and adult use cannabis processing facilities totaling 9,000 square feet (8,860 + 140 office). The proposed processing facility located on the first floor of building "A" occupies 3,000 square feet, the proposed processing facility located on the second floor of building "A" occupies 1,600 square feet and the proposed processing facility located in building "C" occupies 4,400 square feet. Six employees are associated for this operation. Application 13360 is a Conditional Use Permit for a 6,710 (6,570 + 140 office) square foot wholesale nursery. The nursery is located in building "A". Four employees are associated with this operation.

PROJECT LOCATION: The project is located in the Blue Lake area, on the North side of Glendale Drive, approximately .12 miles West from the intersection of Swanson Lane and Glendale Drive, on the property known as 1691 Glendale Drive.

ADDRESS WHERE COPIES OF THE PROPOSED MITIGATED NEGATIVE DECLARATION AND INITIAL STUDY ARE AVAILBLE FOR REVIEW AND WHERE COMMENTS MAY BE MAILED:

Humboldt County Planning and Building Department
3015 H Street
Eureka, CA 95501

The project and the proposed Mitigated Negative Declaration will be considered by the Humboldt County Planning Commission at the May 16, 2019 public hearing. A separate notice this hearing will be provided pursuant to Humboldt County Code 312-8 et seq.

Specific questions regarding the proposed project and the draft Mitigated Negative Declaration may be directed to Caitlin Castellano, Planner at (707) 445-7541.

April 5, 2019

Email :

Castellano, Caitlin

From: Natashalei Daly <natashalei@hotmail.com>
Sent: Thursday, May 16, 2019 9:09 PM
To: Saucedo, Portia; Castellano, Caitlin; Planning Clerk; Bass, Virginia; Fennell, Estelle; Wilson, Mike; Bohn, Rex; Madrone, Steve; Werner, Steve
Subject: Proposed Glendale Cannabis

I have lived on Glendale since the year 2000. I have found Glendale to be a safe and family friendly area and I'm proud to be raising my family here. I have three children ages 11, 4, and 5 months.

Glendale is an area that is just as desirable to live as Blue Lake or Fieldbrook.

We live right down the road (about 500 feet) from the neighborly Murphy's Market. My children and myself take daily walks down Glendale. We almost always walk past people walking their dogs or people walking to the grocery store. Bicyclists are always using Glendale as part of their route....do you even know Mike on a bike? You can ask anyone who actually lives here who Mike on a bike is.

My children collectively will be riding the local school bus for the next 19 years. I sincerely hope that the planning commission is not "planning" on ways to rewrite or circumvent such things as school bus stops and negative community concerns in order to allow a dispensary (which is nothing more than a drug distribution center), extraction facilities with volatile chemicals, cultivation bringing with it the odor of marijuana permeating our homes and our belongings to invade our community. I was under the impression that the planning commission was to help plan our community in line with our vision (we who live here) in a direction we would like to see our community move, not have someone else's plan (marijuana growers and bureaucrats) shoved down our throats.

Moving a bus stop like ours or determining whether the bus stop is a special allowance for one child ignores the fact that these children will be walking past these facilities to get to and from the bus and riding the bus past these facilities on their way to school, and in the family car on a daily basis. Allowing these projects to be placed in the very middle of our Glendale community, in full view of us, our children and future grandchildren is unconscionable and unacceptable. There are so many places where there are no children, no bus stops and no homes where these people could carry on their activities without encroaching on our homes and lives.

I understand that historically this was considered an industrial area because of the sawmills, blue chip etc. The sawmill is gone, the buildings, cement and pavement they laid have over the years been utilized by businesses. This does not mean we want more of the same. We want to move forward and make this a quiet, safe community with sunshine, our store and bowling alley, a mix of small, family oriented, wholesome, beneficial businesses and homes. The people trying to bring cannabis into our neighborhood and to push this through the planning commission do not live here, and do not have the best interest of this community in mind, only self interest. There is no reasonable person who would want this in their neighborhood and outside their front door. Please do not allow these projects to be approved in Glendale. Please help us make Glendale a desirable community that people want to move into, not leave.

Please acknowledge receipt of this email.

Thank you

Natashalei(Tasha)Fisher

1557 Glendale Drive

McKinleyville, Ca

95519

*Attached are the local school bus stop schedules for Blue Lake Elementary and Greenpoint Elementary.

Click here for Greenpoint School Bus Schedule:

<https://docs.google.com/document/d/1b1cxFA2KEinw3wJyCganTEJWOTCM1u7mWzHKFcoHJgM/mobilebasics>

Blue Lake School Bus Schedule:

← Bus Schedule 18-19

G.P. Bus Schedule			
Scotty's Number (904) 315-3541			
School Number (707) 668-5921			
<u>Morning Pick Up</u>	<u>Time</u>	<u>Afternoon Drop Off</u>	<u>Time</u>
Van Leaves Mckinleyville	7:00	Van leaves Green Point w/1st Run	2:45
Van @ 333 Glenwood Dr. (Wiley's, Mcgaughey's, Woodcocks and Lily) (9 Kids) Dara P/U Klawitters @ Renner Station	7:20	Van @ Three Creeks. (Webbs and Jones) (4 Kids)	3:10-15
Green Point to drop off 1st round (0 Kids) Dara to arrive @ School with Klawitters and Ruby	7:50	Green Point to pick up 2nd Run (Wileys, Woodcocks, McGaugheys, Lily) (9 Kids) Dara P/U Klawitters and Ruby	3:35
Van @ Three Creeks. (Webbs and Jones) (4 Kids)	8:25	Van @ 333 Glenwood Dr. (Wileys, Woodcocks, McGaugheys and Lily) (9 Kids) Dara D/O Klawitters @ Renner Station.	4:10-15
Green Point to drop off 2nd round (0 Kids)	8:50	Van Arrives in Mckinleyville	4:25
*In the event the Cookson Kids need a ride the van will pick up at 8:40 AM and drop off at 3:00		Fridays when Webbs go to coast McGaugheys parent pickup. Webbs in Van to Glenwood. Dara to transport Klawitters	

***Note: Early Release is the first Wednesday of each month. Your child will return home 1 hour earlier.**

***Note: Due to traffic and weather and changes in Pick Up/Drop offs please note that times are approximate. Allow a 10-15 minute window for P/U and drop off times.**

updated 8/25/18

2018-2019 Blue Lake Union Elementary ~ Bus Schedule

Morning Run

Time	Address
7:00	LEAVES SCHOOL
7:04	264 Maple Creek Road, RL
7:07	Korbel Parking Lot
7:11	105 Park, RL
7:12	110 Park, RL
7:13	119 Park, RL
7:14	119 Acacia Dr. RL
7:15	851 Railroad Ave. RL
7:17	511 3 rd Street, RL
7:18	3 rd & H Street, RL
7:19	640 3 rd Ave, RL
7:21	640 J Street, RL
7:22	641 4 th Ave., RL
7:23	524 K Street, RL
7:24	540 K Street, RL
7:25	109 Raymar & Evergreen, RL
7:28	121 'F' Street, RL
7:30	231 Railroad Ave., RL
7:31	305 Chartin Rd., RL
7:32	353 Chartin Rd., RL
7:33	561 Hlow Ln, RLC
7:35	Drop Northwest Students at BLS
7:38	Greenhill & Glendale, RL
7:40	Glendale & Hilltop RL
7:42	Swanson Lane, RL
7:43	1557 Glendale, RL
7:44	Glendale & Glendale, RL
7:45	Before Glendale Trailer Park, RL
7:46	Parker Lane, RL
7:49	2779 Fieldbrook Rd., RL
8:00	ARRIVES AT SCHOOL

1st Bell (warning): 8:20 a.m.
Final Bell (tardy): 8:25 a.m.

Afternoon Run

Time	Address
2:50	LEAVES SCHOOL
2:54	119 Acacia Dr., RL
2:55	119 Park, RLC
2:56	110 Park, RL
2:57	105 Park, RL
2:58	109 Raymar, RL
3:00	851 Railroad Ave., RL
3:04	3 rd & H St, RL
3:06	641 4 th St, RL
3:08	640 J Street, RL
3:09	524 K Street, RL
3:10	109 Raymar & Evergreen, RL
3:12	264 Maple Creek Road, RL
3:13	Korbel Parking Lot, RL
3:21	121 'F' Street, RL
3:23	231 Railroad Ave. RL
3:25	305 Chartin Rd., RLC
3:26	353 Chartin Rd., RLC
3:27	561 Hlow Ln, RLC
3:28	Greenhill Ln & Glendale, RL
3:29	Glendale & Hilltop, RL
3:31	Swanson Lane, RL
3:32	1551 Glendale, RL
3:34	Glendale & Glendale, RL
3:35	Before Glendale Trailer Park, RL
3:38	Parker Ln, RL
3:41	2779 Fieldbrook Rd., RL
3:45	ARRIVES AT SCHOOL

RL = Red Lights Flashing
 RLC = Red Light Flashing with Driver Crossing

Stops are determined by driver & CHP;
 Kindergartners need to have someone at stop
 or will return to school. All other grades will
 require minimum walking to a designated stop.

**updated 01/31/2019*

Please go to the stop closest to you, 5 MINUTES PRIOR to time above

Regarding Application # 13312
Parcel # - 516-121-018



Caitlin

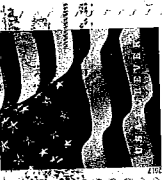
I have concerns, which are.

1. Order - We know what this is like in our area. We don't welcome anymore. If this is allowed there will be no reuse after it is built. Example - Pulp Mills.
2. Chemicals and the process it may take could have effects we know nothing about (Fire - Chemical release ect.)
3. Property values will decrease in our area, with this operation near our homes.
4. Increased drug use in the neighborhood. We don't need more drug users than we already have. We have dealt with these people and the many problems they bring with them. Including theft, litter, needles, and filth.
5. More traffic on Glendale Drive, which already needs repairs. More impaired drivers going to and from this operation create a safety hazard. Many people walk and ride bikes to the local market. This would increase the chances for someone to be severely injured.

Thank You for your consideration.

Dennis Taylor - *Dennis Taylor*

T
Mr. Dennis Taylor
373 Glenwood Ln
McKinleyville, CA 95519



UNITED STATES POSTAL SERVICE
FIRST CLASS PERMIT NO. 1000
EUREKA, CA 95501

Caitlin Castellano Planning division
3015 H. St.
Eureka, Ca. 95501

95501-441599



May 13, 2019

Mr. John Ford, Director and
Planning Commissioners
Humboldt County Planning and Building
3015 H Street
Eureka, CA 95501

Director Ford and Commissioners,

On behalf of Humboldt Baykeeper's board, staff, and members, I submit these comments on the Glendale Cannabis Facility's Initial Study and Mitigated Negative Declaration, Conditional Use Permits, and Special Permits for APN 516-111-064, located at 1691 Glendale Drive in unincorporated Humboldt County near Blue Lake (Case Nos. CUP 16-1096, CUP 16-1127, SP 16-868, SP 16-870, SP 16-871, and SP 16-872; App Nos. 13312, 13319, 13328, 13339, 13346, and 13360).

Humboldt Baykeeper works to safeguard our coastal resources for the health, enjoyment, and economic strength of the Humboldt Bay community, and is a member of the California Coastkeeper Alliance and the international Waterkeeper Alliance.

One of Humboldt Baykeeper's priorities is remediation of former industrial sites that are contaminated with dioxins, which are extremely long-lived chemicals that bind to sediment and soil. Dioxins are some of the most toxic compounds ever manufactured. They are powerful carcinogens and reproductive toxins that magnify as they move up the food web. In aquatic and marine environments, dioxins accumulate in fish, birds, marine mammals, and other fish-eating wildlife - and humans. Lumber mills, boatyards, and other industrial sites that operated from the 1940s until the late 1980s frequently used a wood preservative called pentachlorophenol (known as "penta") which contained dioxins. Due to the hazards to human health and the environment from these dioxins, the U.S. EPA banned the use of penta in lumber treatment and most other uses in the late 1980s (today it is restricted to use on power poles). Potential dioxin contamination near important waterways poses a risk to human health and the environment, and must be fully characterized and remediated prior to ground-disturbing activities, including well construction and grading.

Mailing Address: 600 F Street, Suite 3 #810
Office: 415 I Street, Arcata, CA 95521
(707) 499-3678

www.humboldtбайkeeper.org



Humboldt Baykeeper believes an EIR and Phase II Site Assessment should be prepared to address contamination related to former lumber mill operations on the site, which is poorly addressed in the Phase I Environmental Site Assessment. *See, City of Redlands v. County of San Bernardino* (2002) 96 Cal.App.4th 398, 406 (“The negative declaration is inappropriate where the agency has failed either to provide an accurate project description or to gather information and undertake an adequate environmental analysis.”) The Mitigated Negative Declaration fails to disclose and analyze impacts to water quality, biological resources, and human health related to ground-disturbing activities that would be approved by the permits before you.

Any disturbance of contaminated soil cause by grading, excavation, and other heavy equipment use in or near an unremediated contamination site has the potential to have significant negative impacts to water quality, biological resources, and human health, which has not been adequately assessed, or mitigated to less than significant, in the MND.

The potential for contaminated groundwater to move off-site is especially concerning because of its proximity to the Mad River, which is the source of drinking water supplies for more than 80,000 people in Eureka, Arcata, McKinleyville, Blue Lake, Manila, Glendale, and Fieldbrook. The Mad River is also considered critical and/or essential habitat for salmonids, candlefish, and other aquatic species.

Pursuant to CEQA §15070(a), a Lead Agency shall prepare, or have prepared, a negative declaration or a Mitigate Negative Declaration when the Initial Study shows there is no substantive evidence, in light of the whole record before the agency, supporting a fair argument that the Project may have a significant effect on the environment.

Humboldt Baykeeper believes that the evidence clearly supports a fair argument that significant adverse impacts may occur due to the proposed Project, which is likely to substantially degrade the quality of the environment and cause substantial adverse effects on human beings, either directly or indirectly [CEQA Mandatory Findings of Significance §15065 (a)(1) and (a)(4)]. For these reasons, Humboldt Baykeeper strongly recommends that the Lead Agency prepare an EIR, and opposes the use of an MND for this proposed Project.

Humboldt Baykeeper believes that to avoid or mitigate potential impacts to groundwater, surface water, the Mad River, and human health and safety, it is necessary to conduct further analysis for the reasons enumerated below. Given the contaminants likely to be present on the site, the MND fails to ensure that construction and project-related ground disturbances will not result in the further spread of contamination. *See, Azusa Land Reclamation Co. v. Main San Gabriel Basin Watermaster* (1997) 52 Cal.App.4th 1165, 1200 (“It is the *possibility*, of a significant effect . . . which is at issue, not a determination of the actual effect, which would be the subject of a negative declaration or an EIR” [italics in original].)

The Mitigated Negative Declaration for this project is inadequate due to the failure to identify potential significant impacts to the environment, specifically impacts to water quality, biological resources, and human health and safety related to hazards and hazardous materials associated with the site history as described above.

In addition, the project as proposed fails to comply with Humboldt County's Commercial Cannabis Land Ordinance, which states that for proposed development of commercial cannabis facilities on existing commercial, business park, or industrial sites, "[I]f a Phase I ESA indicates the presence or likely presence of contamination, the applicant shall prepare a Phase II ESA, and recommendations of the Phase II ESA shall be fully implemented prior to ground disturbance, which will be made a condition of approval for the project." (CCLUO 2018, Mitigation Measure 3.7-2a)

I. Use of Pentachlorophenol on the Subject Site

The subject parcel was used for part of the operations of the former McNamara & Peepe Lumber Mill and Blue Lake Forest Products. Recent groundwater monitoring on nearby parcels has found elevated levels of cadmium, chromium, lead, and pentachlorophenol, a wood preservative used to prevent fungus. This fungicide, known as "penta," was used at the mill until 1984, shortly before it was banned for use on lumber due to its high dioxin content.

In October 1968, a penta spill from the Molalla-Arcata Lumber Mill caused a massive fish kill in the Mad River. State wildlife biologists reported that more than 10,000 steelhead were killed immediately following the spill. In January 1969, the McNamara & Peepe mill spilled the chemical into the Mad River.

According to the Initial Study/Mitigated Negative Declaration,

The project site is located on land that was part of a much larger parcel that has been used for lumber processing by multiple companies for decades. Some of those lumber processing activities included using wood preservatives and anti-staining compounds, specifically pentachlorophenol and tetrachlorophenol, which are hazardous materials according to the California Department of Toxic Substances Control (DTSC). These materials were not used on or in the immediate vicinity of the subject parcel. [p. 38]

We dispute the conclusion that these materials were not used on or in the immediate vicinity of the subject parcel based on our review of the 2003 Report of Findings for Phase II Investigation, Blue Lake Forest Products/Aalfs Property by Winzler & Kelly, which indicates that the project site was used for finished (treated) wood storage and sorter/planer operations (adjacent to the greenchain, where wood preservatives were applied (Winzler & Kelly 2003, Fig. 3: Historical Use Map, p. 17). According to the aerial images included in the report, these activities appear to have taken place from 1966-1988, when pentachlorophenol was used.

II. 1998 Remediation of Adjacent Contaminated Site has been Rescinded

The IS/MND goes on to state that “DTSC oversaw the remediation and monitoring of areas of the larger, former parcel that were found to have hazardous material contamination,” concluding that the site contamination has been remediated [p. 38]. However, DTSC rescinded the 1998 Remedial Action Plan in December 2018, declaring that the concrete cap has failed to contain groundwater contaminated with the highly toxic wood preservative pentachlorophenol. DTSC is developing a new plan to remediate and/or control the contamination. It is unclear at this time to what extent the plume of contaminated groundwater may have migrated beneath the subject parcel.

DTSC says that the failure of the cap is related to much higher groundwater levels, which are now 15 feet higher than in 2002, when Blue Lake Forest Products closed and stopped pumping from an on-site well. Due to the higher groundwater levels, the contaminated soil has been in contact with groundwater for years.

Further sampling must be conducted prior to ground disturbing activities associated with development of the site to ensure that soil and/or groundwater contamination will not be mobilized, potential endangering Hall Creek, the Mad River, and construction workers.

Reliance on limited soil and groundwater sampling conducted in 2003 is inadequate to ensure that human health and the environment will be protected if this project is approved without further sampling.

III. Cadmium Detections in Soil

The IS/MND asserts that “In 2003, Winzler and Kelley, Consulting Engineers, conducted a Phase 2 Investigation of the broader area. Their investigation did not detect hazardous materials on the subject parcel, nor did their investigation find evidence that suggested hazardous materials were ever used on the subject parcel.” [p. 38-39]

During the 2003 site assessment, soil and groundwater samples from the subject parcel were analyzed for contaminants associated with the former lumber mill operations on the site (Fig. 4, Boring Location Map, p. 19).

Cadmium is considered on the Proposition 65 list of toxic compounds; it is listed as known to the State to cause developmental toxicity and male reproductive toxicity. 'Cadmium and cadmium compounds' listed as known to the State to cause cancer.

IV. Absence of Site on State and Federal Lists

The IS/MND asserts that “The subject parcel does not appear on the Cortese List. The site is not shown as containing hazardous materials or being involved in any cleanup or monitoring programs on the U.S. Environmental Protection Agency (EPA)

EnviroMapper¹⁰, The California Department of Toxic Substances Control EnviroStor mapper¹¹, or the State Water Resource Control Board Geotracker¹².” [p. 39]

Absence of a site on any of these lists cannot be used as evidence that a site is free of contamination; these are not “presence/absence” databases. Similarly, lack of comments from the Regional Water Quality Control Board and/or Department of Toxic Substance Control must not be regarded by the County as evidence that there is no contamination present, or that either of the agencies’ concerns have been addressed by the County’s analysis.

V. Inadequate Analysis Results in Erroneous Findings

Based on what we believe to be erroneous information, the IS/MND asserts the following findings:

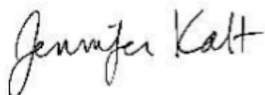
- a) The project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. *Less than significant impact.*

- d) The project would not be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would not create a significant hazard to the public or the environment. *No impact.*

We dispute these findings based on our review of the 2003 Report of Findings for Phase II Investigation, Blue Lake Forest Products/Aalfs Property by Winzler & Kelly, for the reasons enumerated above.

For these reasons, we strongly urge Humboldt County to prepare an Environmental Impact Report and a thorough Phase II Site Investigation focused on the proposed project site prior to approval of the Conditional Use Permit to further identify the extent and magnitude of contamination in soil and groundwater on the site, which is necessary to incorporate the most effective means of avoiding, minimizing, and mitigating these impacts to human health and the environment.

Sincerely,



Jennifer Kalt, Director
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NICHOLAS S. AVDIS
Of Counsel

May 29, 2019

Mr. John Ford, Director and
Planning Commissioners
Humboldt County Planning and Building Department
3015 H Street
Eureka, CA 95501

RE: Application by Michael Brosgart and Arielle Brosgart; APN 516-111-064

Dear Director Ford and Commissioners:

Thomas Law Group submits this letter on behalf of Humboldt Bay Municipal Water District (District) to express concern about the County's intent to approve the proposed Glendale Cannabis project (Project), to be located at APN 516-111-064, on the property known as 1691 Glendale Drive, McKinleyville, CA 95519, based on an environmental analysis contained in a mitigated negative declaration (MND). As discussed in detail below, the County must analyze the proposed Project in an environmental impact report (EIR) to properly understand the scope of impacts before it makes a determination on whether to approve the Project.

The Project proposes a cannabis wholesale nursery, indoor cultivation, processing, volatile and non-volatile extracting manufacturing, and distribution on a 1.77 acre site that lies approximately 550 feet from Hall Creek, which drains into the Mad River, and approximately 2,000 feet from the Mad River itself.

The District is a municipal water district, which supplies high quality water to the greater Humboldt Bay Area, including 88,000 residents of Humboldt County. It operates intake wells in the Mad River, which are located downstream of both the Project site and the point at which Hall Creek flows into the Mad River.

The District is concerned that Project construction and operation will result in contaminated soils and groundwater flowing into Hall Creek to the Mad River and, ultimately, into the District's downstream intake wells. An EIR is required because there is a fair argument that the Project may result in significant environmental impacts related to contaminated soil and groundwater. In addition, adoption of the MND at this time is improper because the County failed to provide proper notice to the District, as required by law.

1. The Project Improperly Relies on a Mitigated Negative Declaration Where There is a Fair Argument that the Project Will Result in Significant Environmental Impacts Related to Contaminated Soils and Groundwater.

A lead agency may not rely on an MND for project approval where substantial evidence supports a fair argument that the project may have a significant impact on the environment. (*Clews Land & Livestock, LLC v. City of San Diego* (2017) 19 Cal.App.5th 161, 183-184.) This standard sets a “low threshold” for preparation of an EIR, such that an EIR must be prepared if there is a “reasonable probability” that the project will result in a significant impact. (*Consolidated Irrig. Dist. v City of Selma* (2012) 204 Cal.App.4th 187, 207; *Sundstrom v County of Mendocino* (1988) 202 Cal.App.3d 296, 309, citing *No Oil, Inc. v. Los Angeles* (1974) 13 Cal.3d 68, 83, fn. 16.) Here, there is a reasonable probability that contaminated soil and groundwater will be disturbed during Project construction, which may result in a significant environmental impact.

Impacts Related to Potential Pentachlorophenol Contamination

The Project site is located on land that was used for timber processing for decades. The timber processing activities included the use of highly toxic pentachlorophenol (PCP) and tetrachlorophenol (TCP) wood preservatives. Use of these chemicals led to significant levels of contamination beneath and near the “green chain,” which was a conveyor system where lumber was moved, sorted, and submersed in solutions containing PCP and TCP. Figure 2 in the Phase II shows that the former “green chain” lies approximately 700 feet to the west of the Project site.

The MND suggests that the contaminated area near the green chain was remediated under DTSC oversight. In doing so, the MND improperly relies upon the 2003 Phase II and fails to address the fact that remedial measures have failed, such that PCP concentrations have skyrocketed above the maximum contaminant level (MCL) of 1 µg/L at numerous monitoring wells surrounding the former green chain. Grab groundwater samples in 2005 contained PCP and TCP concentrations as high as 16,000 µg/L and 1,500 µg/L, respectively. (Exhibit A [DTSC Decertification Letter, Dec. 28, 2018], p. 3.) DTSC explained that groundwater elevations rose approximately 15 feet since 2002 causing groundwater to come into contact with PCP- and TCP-impacted soil, which has resulted in “mobilizing hazardous substances from soil to groundwater.” (*Ibid.*) During the most recent groundwater sampling event of monitoring wells surrounding the former green chain area, PCP levels exceeded the MCL in 4 of 8 wells sampled, reaching as high as 570 µg/L, and the levels of PCP in each of those wells had increased since the prior sampling event in 2016. (Exhibit B [Second Quarter 2017 Groundwater Monitoring Report], p. 4-1, 5-1.) Significantly, PCP levels increased and exceeded the MCL at MW-11—the monitoring well closest to the Project site. (Exhibit B, Figure 3 & Table 2.) In December 2018, DTSC rescinded the prior Remedial Action Certification finding “soil and groundwater contamination at the Site is not under control and the implemented remedial actions are no longer protective of human health and the environment.” (Exhibit A, p. 1.)

The depth to groundwater at the Project site may be as little as 7 feet below ground surface. The MND states construction of the sewer line would require excavation to depths of 6-8 feet. Given

DTSC's finding that groundwater contamination is no longer under control and remedial actions are no longer protective of human health and the environment, it is possible that the groundwater under the site is contaminated with PCP and has contaminated the soil at the Project site as well. Therefore, it is possible that contaminated groundwater and soil will be encountered during excavation. Moreover, installing sewer lines will provide a preferential pathway likely to further exacerbate migration of any contaminants present in the soil or groundwater. Accordingly, further study is necessary to determine: (1) the extent of contamination at the Project site; (2) whether installing a sewer line will exacerbate the plume's migration; and (3) the environmental impact of excavating potentially contaminated soil and groundwater.

As the water provider for 88,000 residents of Humboldt County, the District is concerned that construction activities will result in PCP from contaminated groundwater and soil flowing into Hall Creek to the Mad River and, ultimately, into the District's downstream intake wells. At minimum, the fact that the PCP plume is migrating and may have contaminated the Project site constitutes substantial evidence to support a fair argument that the Project may result in a significant environmental impact.

Impacts Related to Potential Hydrocarbon Contamination

In addition, part of the Project will involve volatile extraction manufacturing, using hydrocarbon based solvents. The MND fails to analyze the potential environmental impacts related to potential hazardous material spills on site arising from the transport, storage, or use of the hydrocarbon solvents on the Project site. While the MND recognizes that a spill or accident involving the solvents is "foreseeable," it simply concludes, without analysis, that such a spill or accident would be unlikely to create a significant hazard to the public or environment. In particular, the MND fails to address the potentially significant impact to the District's water supply if a hazardous material release occurred on the Project site. Given that the MND admits hazardous material "spill or accident conditions" are "foreseeable," an EIR is required to analyze the impacts of such a spill or accident on the environment, particularly on the County's drinking water supply.

2. The County Failed to Comply with CEQA's Notice Requirements.

One of CEQA's primary purposes is to ensure informed decisionmaking and public participation. (*Clews Land & Livestock, LLC, supra*, 19 Cal.App.5th at p. 183.) "[N]oncompliance with the information disclosure provisions of [CEQA] which precludes relevant information from being presented to the public agency . . . may constitute a prejudicial abuse of discretion . . . regardless of whether a different outcome would have resulted if the public agency had complied with [the information disclosure] provisions." (Pub. Resources Code, § 21005(a).)

CEQA requires notice of the intent to adopt a mitigated negative declaration to individuals and organizations that previously submitted written requests for notice. (Pub. Resources Code, §§ 20192(b)(3), 21092.2(a); CEQA Guidelines § 15072(b).) On May 21, 2018, the District submitted a written request for notice of all development projects within the Mad River Watershed proposed under Industrial/Commercial related zoning. Despite its request, the District was not properly

notified of the County's intent to adopt the MND. Because the MND was sent to the State Clearinghouse, the statutorily required notice and comment period was to run 30 days. (CEQA Guidelines, § 15073(a).) Accordingly, the public notice and comment period was open from April 4 to May 3, 2019. However, the District was not provided notice until April 15, 2019, 11 days into the comment period. This constitutes a failure to provide proper notice pursuant to CEQA sections 21092(b)(3) and 21092.2(a) as well as Guidelines section 15072(b).

Additionally, CEQA Guidelines section 15073(c) requires a notice of intent to adopt a proposed MND be sent to every "public agency with jurisdiction by law over resources affected by the project." Given that the District is legally authorized to supply drinking water to the residents of Humboldt County and that the Project could impact drinking water supplies of over 80,000 customers, the District is unquestionably a public agency with legal jurisdiction over a resource affected by the Project. As discussed above, the County failed to provide timely notice to the District because it did not notify the District of the intent to adopt the MND until 11 days into the notice and comment period. Because the County provided less than 30 days' time to the District to comment on the Project, the County failed to comply with CEQA Guidelines section 15073. A failure to provide notice to public agencies listed in CEQA Guidelines section 15073 may constitute prejudicial error, warranting the MND to be set aside. (*Fall River Wild Trout Foundation v. County of Shasta* (1999) 70 Cal.App.4th 482, 493 [finding prejudicial abuse of discretion arising from lack of notice to relevant public agency]; see *Gentry v City of Murrieta* (1995) 36 Cal.App.4th 1359, 1387-1388 ["caution[ing] that the initial study is not necessarily the *only* basis for finding that a proposed negative declaration must be sent to another public agency" with jurisdiction over an affected resource and concluding that failure to notify a public agency as required under CEQA Guidelines section 15073(b) constituted an abuse of discretion] (emphasis original).) Had the required notice been timely provided to the District, the District would have lodged the above arguments in opposition to the MND within the notice and comment period. (See *Fall River Wild Trout Foundation, supra*, 70 Cal.App.4th at p. 493 [discussing prejudice to the public based on unavailability of comments from relevant agency due to lack of notice to the agency].)

In sum, adoption of the MND is improper on procedural and substantive grounds. The County failed to provide notice as required by CEQA, impairing informed decisionmaking and public participation. Furthermore, there is substantial evidence to support a fair argument that the Project may have significant environmental impacts related to contamination of soils and groundwater on the Project site. An EIR is required to adequately analyze these impacts and provide mitigation to prevent any potential contamination of District water.

Respectfully,



Anne Baptiste

cc: Humboldt Bay Municipal Water District

Exhibit A

Available at

https://www.envirostor.dtsc.ca.gov/public/deliverable_documents/8383564591/Decertification%20%5BD%20TSC%2012-28-18%5D.pdf



Matthew Rodriguez
Secretary for
Environmental Protection



Department of Toxic Substances Control

Barbara A. Lee, Director
700 Heinz Avenue
Berkeley, California 94710-2721



Edmund G. Brown Jr.
Governor

December 28, 2018

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**DECERTIFICATION, MCNAMARA AND PEEPE LUMBER MILL, GENDALE,
HUMBOLDT COUNTY, CALIFORNIA**

Dear Mr. Aalfs, Ms. Finch, and Mr. Schultz:

The Department of Toxic Substances Control (DTSC) issued a Remedial Action Certification on March 9, 1998 for McNamara and Peepe Lumber Mill (Site) upon implementation of the remedial actions pursuant to the December 4, 1994 Remedial Action Plan. However, subsequent soil and groundwater investigations have revealed that soil and groundwater contamination at the Site is not under control and the implemented remedial actions are no longer protective of human health and the environment. Therefore, DTSC rescinds the March 9, 1998 Remedial Action Certification and issues this Decertification based on the following findings:

Site Identification and Landowners: The Site is located in Glendale, an unincorporated community in Humboldt County, approximately 0.9 miles southeast of the City of McKinleyville and approximately 1.2 miles northwest of the City of Blue Lake, Humboldt County, California. The Site occupies approximately 26 acres with nine Assessor's Parcel Numbers (APNs). The current landowners of the Site are (a) Blue Lake Forest Products, Inc. and (b) Jennifer Finch and Robert Schultz.

- Blue Lake Forest Products, Inc. owns seven parcels with APNs 516-091-020, 516-101-040, 516-101-060, 516-111-062, 516-111-063, 516-111-064, and 516-111-066 located on 1619 Glendale Drive.
- Jennifer Finch and Robert Schultz own two parcels with APNs 516-151-003 and 516-151-004 located on 1678 Glendale Drive.

1998 Remedial Action Certification: On December 5, 1994, DTSC approved the Remedial Action Plan with the following remedies for the Site:

- Consolidation of pentachlorophenol (PCP) and tetrachlorophenol (TCP) contaminated soils at the Green Chain area and installation of a new cap over such contaminated soils at areas encompassing APNs 516-101-060 and 516-111-063;
- Surface water and groundwater monitoring; and
- A land use covenant prohibiting any site activities which may compromise the integrity of the cap located at areas within APNs 516-101-060 and 516-111-063 and concrete slab located at an area within APN 516-151-003, as well as prohibiting development of these areas for uses for a residence, long-term care hospital, day-care facility, and school.

On March 9, 1998, DTSC issued the Remedial Action Certification stating that (a) all appropriate remedial actions have been completed, (b) a deed restriction was recorded the County's Recorder Office, and (c) long-term surface water and groundwater monitoring are necessary at the Site.

Subsequent Investigations and Contamination: During groundwater monitoring events conducted from 1997 through 2002, PCP concentrations were predominately below the cleanup goal of 1 µg/L and TCP concentrations were all below the laboratory reporting limit of 1 µg/L. In April 2002, Blue Lake Forest Products, Inc. declared bankruptcy and ceased groundwater pumping from an onsite lumber mill production well PW-1, which caused a rise of the groundwater elevation to approximately 15 feet higher than the previous groundwater elevation measured while the production well was operational. Since April 2002, groundwater has been in contact with the PCP- and TCP-impacted soil beneath the cap, thereby mobilizing hazardous substances from soil to groundwater.

Grab groundwater samples collected in May 2005 at various Site locations contained PCP and TCP concentrations as high as 16,000 µg/L and 1,500 µg/L, respectively. From December 2003 through May 2017, PCP and TCP have been detected in groundwater monitoring wells at concentrations up to 2,200 µg/L and 120 µg/L, respectively.

On April 22, 2008, DTSC issued an Imminent and Substantial Endangerment Determination, Docket No. I&SED 07/08-009 for this Site, because there has been a release or a threatened release of hazardous substances at the Site.

The former saw mill area, located within APNs 516-111-062 and 516-111-063, is partially unpaved and located adjacent to the cap at the Green Chain area encompassing APNs 516-101-060 and 516-111-063. The former saw mill building at the former saw mill area was demolished in 2006. Portions of the building foundation, in poor condition, remain at the former saw mill area. In 2010 and 2011, DTSC conducted investigation at the former saw mill area and found PCP concentrations in soil ranging from 1.8 mg/kg to 40 mg/kg, above the PCP cleanup goal of 1.75 mg/kg established in the 1994 Remedial Action Plan.

Therefore, the remedy selected in the 1994 Remedial Action Plan is no longer protective because (a) rising groundwater level have mobilized PCP/TCP in soil beneath the Green Chain area cap due to cessation of production well pumping in 2002; (b) surface water can percolate through PCP/TCP-impacted soil present below the former saw mill area as this area is partially unpaved and/or covered with a building foundation in poor condition; and (c) PCP/TCP can migrate offsite in groundwater or surface water runoff across the former saw mill area. Since the former saw mill area is partially unpaved and the pavement is in poor condition, people also run the risk of coming into direct contact with the contaminants. Therefore, additional remedial action is necessary to prevent potential exposures and rainwater infiltration at the former saw mill area.

Remedial Action Plan Amendment: To address the contaminated soil and groundwater, DTSC plans to prepare a Remedial Action Plan Amendment and select the appropriate remedy or remedies necessary to mitigate the impact of hazardous substances at the Site. The Remedial Action Plan Amendment will evaluate a range of the alternatives including capping of the former saw mill area, enhanced biodegradation of chemicals in groundwater, long-term groundwater monitoring, and amending the land use covenant.

Mr. Aalfs, Ms. Finch, and Mr. Schultz
December 28, 2018
Page 4

If you have any questions, please contact Henry Wong of my staff at (510) 540-3770 or henry.wong@dtsc.ca.gov.

Sincerely,



Janet Naito
Branch Chief
Site Mitigation and Restoration Program

cc: Stephanie Lai
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Exhibit B

Full Report available at

https://www.envirostor.dtsc.ca.gov/public/deliverable_documents/8077635049/Groundwater%20Monitoring%20Report%2C%20May%202017%20%5BSGI%207-19-17%5D.pdf

**SECOND QUARTER 2017
GROUNDWATER MONITORING REPORT**

**McNamara and Peepe Lumber Mill
1619 and 1678 Glendale Drive
Arcata, California**

01-DTSC-006

Prepared For:

California Department of Toxic Substances Control
700 Heinz Avenue
Berkeley, California 94710
Contract No. 14-T3913

Prepared By:



The Source Group, Inc., A division of Apex Companies, LLC.
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July 19, 2017

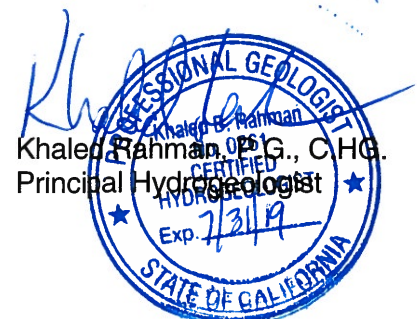


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1.0 INTRODUCTION

The Source Group, Inc., a division of Apex Companies, LLC. (SGI-Apex), has prepared this *Second Quarter 2017 Groundwater Monitoring Report* (Report) for the McNamara and Peepe Lumber Mill located at 1619 and 1678 Glendale Drive in Arcata, California (hereinafter the Site, Figure 1). This Report and the scope of work presented herein were conducted for the California Environmental Protection Agency (Cal/EPA), Department of Toxic Substances Control (DTSC) under Contract No. 14-T3913.

This Report presents the results of the groundwater monitoring and sampling event conducted at the Site on May 8, 2017. The field activities were conducted in general accordance with the *Soil and Groundwater Investigation Work Plan* (Work Plan; URS Corporation [URS], 2011). This Report summarizes the monitoring and sampling field activities, laboratory analytical results for pentachlorophenol (PCP) and 2,3,4,6-tetrachlorophenol (TCP), water quality parameters, and quality assurance protocols. In response to a DTSC request, the concrete slab at the “new” dip tank building (Dip Tank Building), which is located at 1678 Glendale Drive, was also inspected during the May 2017 event.

2.0 SITE BACKGROUND

The Site is a former lumber mill located in an unincorporated area of Humboldt County, approximately one mile southeast of McKinleyville, California and five miles northeast of Arcata, California. The Site operated as a lumber mill under multiple owners from the 1940s until 2002 (URS Corporation [URS], 2011). A detailed summary of background information for the Site is presented in a *Five-Year Comprehensive Review* prepared by the DTSC (DTSC, 2014). The following section provides a brief overview of the Site.

2.1 Site and Vicinity Description

As shown on Figure 2, the Site totals approximately 21 acres located north and south of Glendale Drive (DTSC, 2014). The northern portion of the Site is located at 1619 Glendale Drive (Assessor Parcel Numbers [APNs]: 516-111-062 and 516-111-063) and consisted of the former Green Chain area, Saw Mill, Planer Chain, and a groundwater production well (URS, 2011). The 1619 Glendale Drive portion of the Site is currently leased to Royal Gold for storage and distribution of potting soil and compost. The southern portion of the Site is located at 1678 Glendale Drive (APNs: 516-151-003 and 516-151-004) and is the location of the Dip Tank Building. Based on the findings of our Site walk (see below), the 1678 Glendale Drive portion of the Site is currently owned by Gary Johnson and is used for equipment and vehicle maintenance storage.

The Site is surrounded by residential and commercial/light industrial properties to the west, north, east and south. The Mad River is located approximately 0.25 miles south of the Site.

2.2 Geological and Hydrogeological Setting

The Site is located in the Dows Prairie Subbasin, which is the northern portion of the Mad River Groundwater Basin (California Department of Water Resources [DWR], 2004). The Hookton Unit is the primary water-bearing unit in the Dows Prairie Subbasin and underlain by the Franciscan Formation (DWR, 2004). The Hookton Unit consists of fine-grained (clay) and coarse-grained (sand and gravel) intervals that are approximately 150-200 feet in depth (DWR, 2004).

Previous investigations conducted at the Site indicate that the shallow subsurface consists of alluvial and terrace deposits composed of fine-grained silts and clays, and coarse-grained sands and gravels. Based on previous investigations, groundwater was measured at depths of approximately 8.0 feet below ground surface (bgs) to 30 feet bgs and generally flows to the south-southwest toward the Mad River (URS, 2011).

2.3 Historic Land Use

McNamara and Peepe operated the lumber mill from 1969 until they filed for bankruptcy in 1985 (DTSC, 2014). Chemical fungicides containing PCP and TCP were applied to processed lumber at the Site in dip tanks or with spray applications from 1967 to 1984 (URS, 2011). Dip tanks were present near the Green Chain area on the 1619 Glendale Drive portion of the Site (Figure 3), and in

the Dip Tank Building on the 1678 Glendale Drive portion of the Site (Figure 2). Spray applications were conducted at the Planer Chain building (Figure 2). During this period, several incidents of improper storage, spills, and leaks are documented (DTSC, 2014). Blue Lake Forest Products leased and operated the mill without the use of PCP and TCP from 1986 until lumber mill operations ceased at the Site in 2002 (DTSC, 2014).

2.4 Regulatory Oversight

Regulatory oversight of the Site was conducted by the North Coast Regional Water Quality Control Board (NCRWQCB) from 1968 to 1984 and included establishment of waste discharge requirements (WDRs) for the Site (URS, 2011). In 1982, NCRWQCB adopted WDRs, issued a Cease-and Desist Order (Order No. 82-3; the Order), required the lumber mill operator to cease discharge of fungicide wastes, determine the source of the discharge, prepare a plan for eliminating discharges, and implement the plan according to the schedule outlined in the Order (URS, 2011). DTSC became the lead oversight agency for the Site in 1984 and issued a Remedial Action Order (RAO; No. 88/89-023), which was amended in 1996 (No. 95/96-072). In 2008, DTSC issued an Imminent and Substantial Endangerment Determination (ISED No. 07/08-009; DTSC, 2008).

2.5 Remedial Activities

DTSC approved a *Remedial Action Plan* (RAP) for the Site in 1994 (DTSC, 2014). The former Green Chain area and former Saw Mill building were identified as the source area for PCP and TCP in soil and groundwater (Figure 3). A concrete cap over the Green Chain area was selected as a remedy for the Site and was constructed in 1998 (DTSC, 2014). A land use covenant (LUC) was issued in 1998 to restrict use in two areas of the Site: the “Cap Restricted Area” on the former lumber mill property located at 1619 Glendale Drive and the “Concrete Slab Restricted Area” located in the Dip Tank Building located at 1678 Glendale Drive. Routine assessments of the concrete cap indicate the condition of the cap was excellent. Since construction of the concrete cap, the former Saw Mill building has been demolished.

Elevated PCP concentrations (>1,100 micrograms per liter [$\mu\text{g/L}$]) in groundwater were detected in Site monitoring wells during the 2003 annual monitoring event. A remedial investigation (RI) was conducted in 2005 to evaluate the source of the elevated PCP concentrations in groundwater (DTSC, 2014). The RI concluded that dissolution of PCP and TCP from soil into groundwater was due to a rise in groundwater elevations of up to 15 feet across the Site since 2001. The rise in groundwater elevations was attributed to cessation of groundwater extraction from production well PW-1 in the northern portion of the Site in 2002 (DTSC, 2014).

2.6 Groundwater Monitoring Well Network

The groundwater monitoring well network consists of wells MW-1, MW-5, MW-7, MW-8, MW-9, MW-11, and MW-12, which are located at 1619 Glendale Avenue, and well MW-10 offsite on Glendale Avenue (Figure 3). As summarized on the table below, well construction details indicate that the monitoring wells are screened to maximum depths of 25 feet bgs, except for well MW-7,

which is screened from 22 feet bgs to 37 feet bgs. Readily available groundwater monitoring well logs are included in Appendix A.

Well Name	TOC (feet amsl)	Screened Interval (feet btoc)
MW-1	90.92	19-23
MW-5	93.25	18-23
MW-7	98.90	22-37
MW-8	96.04	8.5-24
MW-9	99.65	21-25
MW-10	95.65	9-24
MW-11	91.70	9.5-24.5
MW-12	91.73	10-20

Notes:

TOC = top of casing
 amsl = above mean seal level
 btoc = below top of casing

2.7 Recent and Planned Activities

Groundwater monitoring events conducted in December 2016 were documented in the *Fourth Quarter 2016 Groundwater Monitoring Report*, which included supplemental analytical results collected to support an evaluation of remedial alternatives (SGI-Apex, 2017). A remedial alternative evaluation for PCP and TCP in groundwater is in preparation.

3.0 GROUNDWATER MONITORING ACTIVITIES

3.1 Groundwater Monitoring Wells

On May 8, 2017, eight (8) groundwater monitoring wells (MW-1, MW-5, MW-7, MW-8, MW-9, MW-10, MW-11, and MW-12) were gauged and sampled. Field data forms are included in Appendix B.

3.2 Groundwater Sampling Activities

Groundwater sampling activities were completed in accordance with the Groundwater Monitoring Well Low Flow Sampling Standard Operating Procedure (SOP-005) included in Appendix D of the Work Plan (URS, 2011). No deviations from the SOP were noted. Sampling activities consisted of the following:

- Depth to groundwater and total depth were gauged in each monitoring well to the nearest 0.01 foot using an electronic water level indicator;
- Low-flow sampling methods were used to collect samples from groundwater monitoring wells. Well purging and water quality parameters (pH, temperature, specific conductance, dissolved oxygen [DO], and oxidation-reduction potential [ORP], turbidity, and total dissolved solids [TDS]) using a water quality meter were recorded on groundwater sampling forms (Appendix B);
- One duplicate sample was collected from well MW-1 for quality assurance/quality control (QA/QC) purposes;
- Sample containers provided by the analytical laboratory were labeled with a unique sample identification number consistent with previous sampling events (e.g., MW-1), date and time of sample collection, sampler, preservation, and analytical method; and
- Samples were submitted to North Coast Laboratories of Arcata, California, a California State Environmental Laboratory Accreditation Branch (CA ELAP)-certified laboratory under standard chain-of-custody protocols.

3.3 Laboratory Analysis

Groundwater samples were analyzed for:

- PCP and TCP by Canadian Pulp Method (Chlorinated Phenols) National Council for Air and Stream Improvement (NCASI) 86.07.

Laboratory analytical reports are presented in Appendix C.

3.4 Investigation-Derived Waste Disposal

Purgewater and decontamination water produced during sampling activities were stored onsite in a Department of Transportation (DOT)-approved 55-gallon drum. The drum was transported to the

Woodward Drilling Company, Inc. wastewater treatment facility, in Rio Vista, California on May 9, 2017 (Appendix D).

3.5 Site Walk of 1678 Glendale Drive Dip Tank Building

A reconnaissance of the concrete slab floor of the Dip Tank Building located at 1678 Glendale Drive was completed in response to an April 21, 2017 DTSC email request. Prior to the monitoring event, contact information for the owner of this property was not readily available. During the monitoring event, an onsite facility representative indicated that Gary Johnson was the property owner. During a subsequent discussion, Mr. Johnson verbally approved access to the property for inspection.

The condition of the concrete slab floor of the Dip Tank Building appeared similar to DTSC's 2007 observations documented in the Annual Inspection Report (DTSC, 2007). The building is largely used to store vehicles and maintenance equipment. Localized oil staining and surface deterioration (e.g., chatter marks) were observed. No signs of cracking or settling were observed in the readily accessible areas. Photographs of the concrete slab floor of the Dip Tank Building are provided in Appendix E.

4.0 GROUNDWATER MONITORING RESULTS

4.1 Groundwater Elevations

During the May 2017 gauging event, depth to groundwater measurements ranged from 5.00 feet below top of casing (btoc) in well MW-1 to 11.38 feet btoc in well MW-7. The water levels are approximately 0.9 feet to 2.0 feet deeper than observed during the December 2016 monitoring event. Note that the depth to water in well MW-10, which was considered anomalous in December 2016, was more consistent with historic levels in May 2017.

Groundwater elevations ranged from 84.71 feet above mean sea level (msl) in well MW-10 to 90.66 feet above msl in well MW-9. Based on the groundwater elevation data collected during the May 2017 gauging event, horizontal hydraulic gradients are generally to the south-southwest. The May 2017 groundwater elevation data and contours are presented on Figure 4. Groundwater level measurements and elevation calculations are presented in Table 1.

4.2 Water Quality Parameter Data Summary

The water quality parameters measured in the field during the May 2017 monitoring event is summarized on Table 1. General findings for May 2017 water quality parameters are described below.

- DO concentrations ranged from 0.17 milligrams per liter (mg/L) to 1.47 mg/L. DO concentrations below 1 mg/L were measured in wells MW-1, MW-5, MW-8, MW-10, and MW-11;
- ORP levels ranged from 14.4 millivolts (mV) to 465.7 mV;
- pH ranged from 5.08 to 6.00. The prevalence of pH values below 7.0 indicates slightly acidic groundwater conditions beneath the Site;
- Conductivity measurements ranged from 0.094 millisiemens per centimeter (mS/cm) to 0.546 mS/cm; and
- TDS levels ranged from 62 mg/L to 355 mg/L.

4.3 PCP and TCP Groundwater Analytical Results

The PCP and TCP analytical results for groundwater samples collected during the May 2017 monitoring event are summarized on Table 2. Laboratory analytical reports are presented in Appendix C. General findings for PCP and TCP in groundwater are described below.

- PCP was detected above laboratory reporting limits in four of the eight monitoring wells sampled. Detected concentrations were reported at up to 570 µg/L in well MW-1, 81 µg/L in well MW-12, 46 µg/L in well MW-5, and 1.9 µg/L in well MW-11.
- TCP was detected above laboratory reporting limits in two of the eight monitoring wells sampled at a concentration of up to 8.4 µg/L in well MW-1 and 2.3 µg/L in well MW-5.

The May 2017 distribution of PCP and TCP in shallow water-bearing zone are depicted on Figure 4.

4.4 Groundwater Monitoring Quality Assurance/Quality Control

The groundwater analytical data collected during the May 2017 monitoring event were evaluated to ensure that the data quality objectives identified in the *Quality Assurance Project Plan* were met (URS, 2011). The results were reviewed for precision, accuracy, representativeness, completeness, comparability, and method detection limits. The laboratory reports were reviewed for data completeness, chain-of-custody, holding times, blanks, surrogates, and laboratory control samples and duplicates. In addition, QA/QC samples (field duplicate samples) were collected during the 2017 monitoring event. QA/QC analyses included the following:

- Method blank;
- Laboratory control spike (LCS)/laboratory control spike duplicate (LCSD);
- Surrogate recoveries; and
- Field duplicate samples for similarity.

The QA/QC findings indicate the following:

- No detections in the method blanks were noted;
- LCS/LCSD and surrogate recoveries were within control limits; and
- Field duplicates results were sufficiently similar ($RPD < 30\%$) in PCP and TCP concentrations (Table 3).

Based on these findings, the overall data quality is considered acceptable.

5.0 FINDINGS

5.1 Water Levels

Findings of the water level data for May 2017 indicate:

- Groundwater elevations were approximately 1.0 to 2.0 feet lower than during the December 2016 monitoring event; and
- Horizontal hydraulic gradients to the south, in general, were consistent with historic observations.

5.2 PCP and TCP Distribution

PCP and TCP concentrations were detected in monitoring wells in the central area of the Site near the former Green Chain area and former Saw Mill building (Figure 4). For screening level purposes, the California maximum contaminant level (CA MCL) for PCP of 1 µg/L was used. There is no CA MCL for TCP. A summary of the May 2017 findings indicates:

- PCP concentrations exceed the CA MCL of 1 µg/L in wells MW-1, MW-5, MW-11, and MW-12, which are located hydraulically downgradient and south of the former Green Chain area and former Saw Mill building. The December 2016 and May 2017 data indicate PCP concentrations increased in each of these four wells. The PCP concentration in well MW-1 increased from up to 1.2 µg/L in December 2016 to 570 µg/L in May 2017. Concentration increases may be attributed to a dissolution of mass associated with observed higher groundwater elevations in the fourth quarter of 2016 across the Site;
- TCP was detected above laboratory reporting limits in wells MW-1 and MW-5. The December 2016 and May 2017 data indicate that the TCP concentration in well MW-1 increased but was similar to May 2016 concentration. TCP concentrations in well MW-5 were similar to previous results since 2002; and
- The May 2017 PCP and TCP distributions are similar and consistent with the historical distribution. As depicted on Figure 4, the absence of TCP in well MW-12, suggests PCP has a slightly larger distribution than TCP. The presence of a low concentration of PCP in well MW-11 was similar to intermittent low detections since 2010.

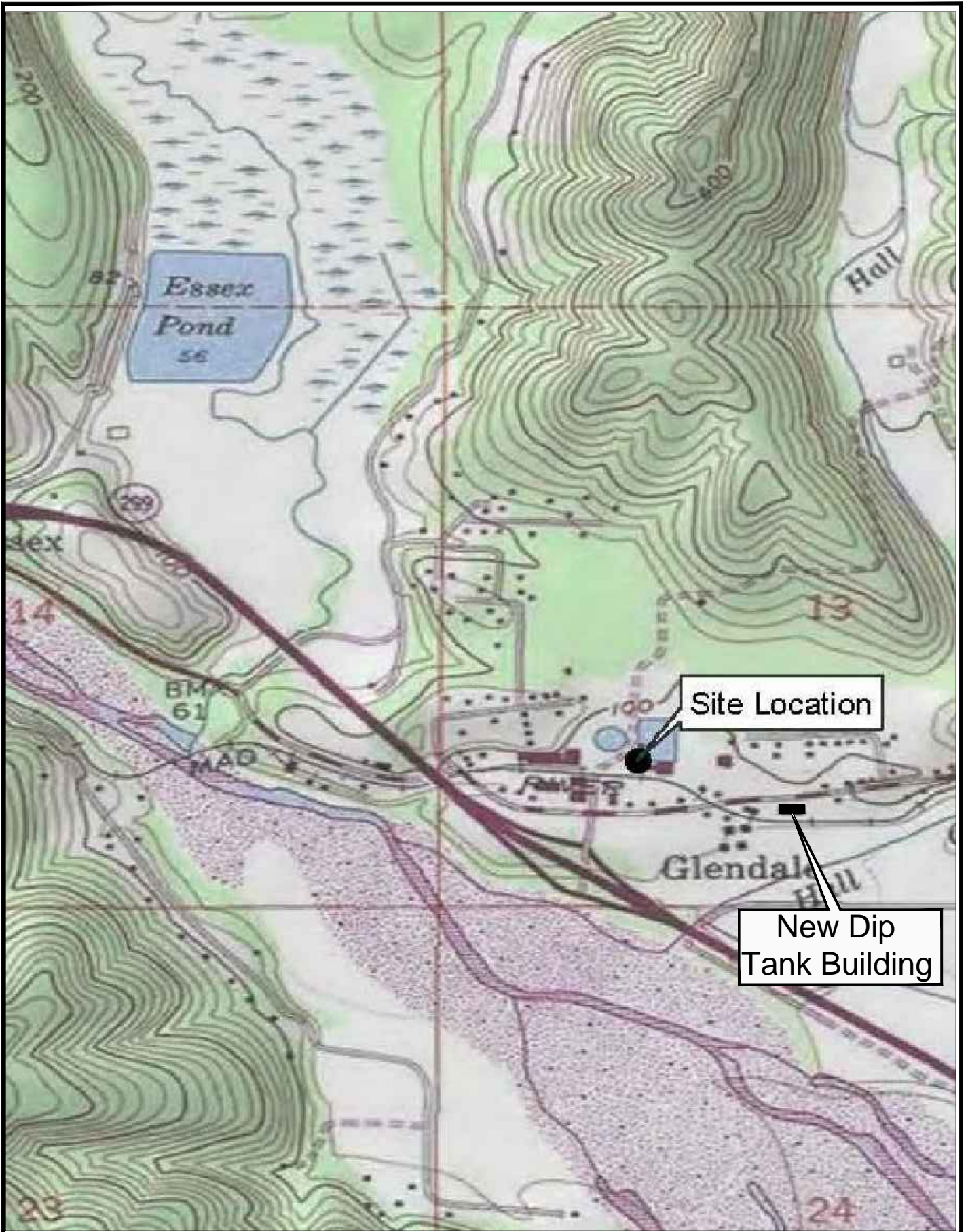
6.0 LIMITATIONS

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7.0 REFERENCES

- California Department of Toxics Substances Control (DTSC). 2007. Annual Inspection Report, Former McNamara and Peepe Lumber Mill. July 11.
- DTSC. 2008. McNamara and Peepe Lumber Mill, Docket Number I&/SE 07/08-009, Imminent and Substantial Endangerment Determination. April 22.
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- California Department of Water Resources (DWR). 2004. California's Groundwater Bulletin 118. Updated February 27.
- The Source Group, Inc., a division of Apex Companies, LLC., (SGI-Apex). 2017. Fourth Quarter 2016 Groundwater Monitoring Report, McNamara and Peepe Lumber Mill, 1589 Glendale Drive, Arcata, California. January 27.
- URS Corporation (URS). 2011. Soil and Groundwater Investigation Work Plan, McNamara & Peepe Lumber Mill, 1589 Glendale Drive, Arcata, California. October 24.

FIGURES



3478 BUSKIRK AVENUE, SUITE 100
PLEASANT HILL, CA 94523

McNAMARA AND PEEPE
LUMBER MILL
ARCATA, CALIFORNIA

SITE LOCATION MAP



PROJECT NO.	DATE	DR. BY:	APP. BY:
01-DTSC-006	07/19/17	ZA	KR

**FIGURE
1**



Source: Humbolt County Planning and Building Department, 7/13/17



McNAMARA AND PEEPE
LUMBER MILL
ARCATA, CALIFORNIA

SITE LAYOUT



3478 BUSKIRK AVENUE, SUITE 100
PLEASANT HILL, CA 94523

PROJECT NO. 01-DTSC-006	DATE 07/19/17	DR. BY: ZA	APP. BY: KR
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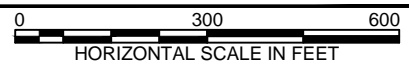
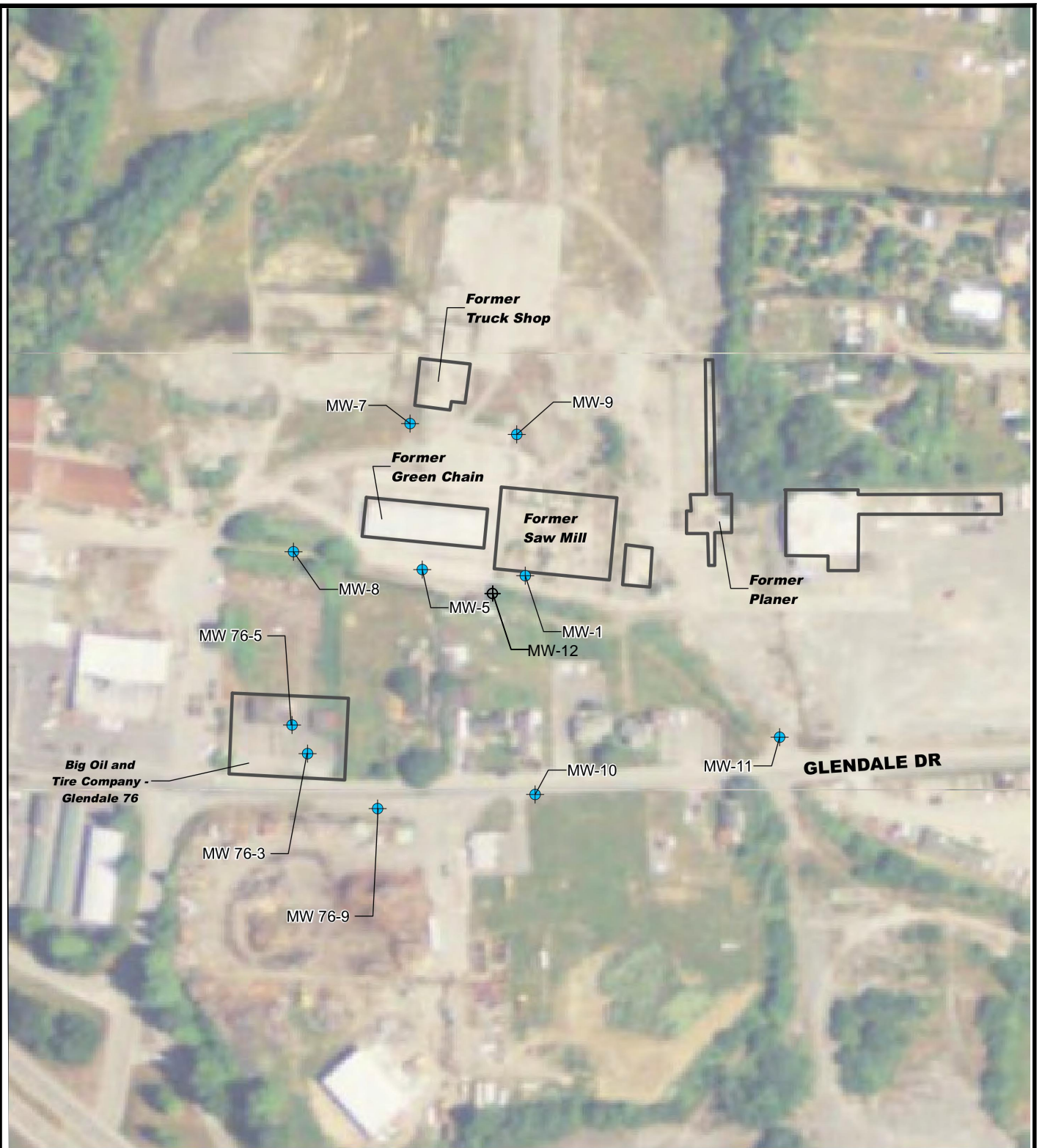




FIGURE
2



LEGEND

-  Monitoring well location
-  Building/former building

Source: URS, 2011 Soil and Groundwater Investigation Work Plan, October.



3478 BUSKIRK AVENUE, SUITE 100
PLEASANT HILL, CA 94523

McNAMARA AND PEEPE
LUMBER MILL
ARCATA, CALIFORNIA

PROJECT NO. 01-DTSC-006	DATE 07/19/17	DR. BY: ZA	APP. BY: KR
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SITE FEATURES

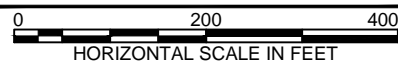






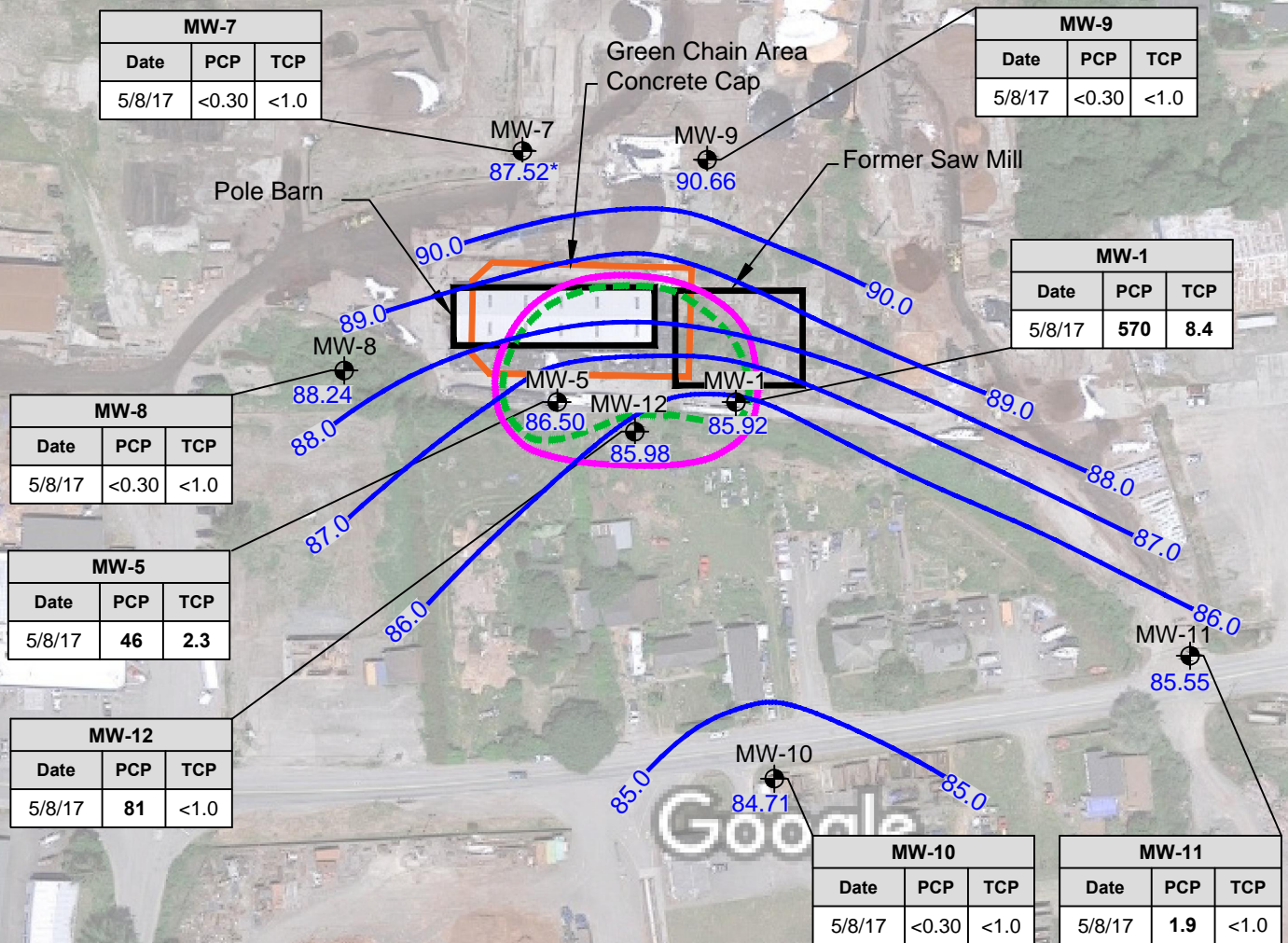
FIGURE 3

S:\Clients A - F\DTSC_McNamara_Peepe Corp - DTSC-006\Report - May 2017\Fig.4-GW Elevation Contours, PCP & TCP Concentration in GW (from Server5).dwg, 7/19/2017 12:49:59 PM

LEGEND

- MW-7 Monitoring Well Designation
 -  Monitoring Well Location
 - 87.52 Groundwater Elevation
 - PCP Pentachlorophenol
 - TCP 2,3,4,6-Tetrachlorophenol
 - * Data Not Used in Contouring
 -  Groundwater Elevation Contour
 -  PCP Concentration Contour >1.0 µg/L
 -  TCP Concentration Contour >1.0 µg/L
- All results in micrograms/liter (µg/L)
 Bolded results: Analyte concentration exceeds laboratory reporting limit

Basemap Source: Google, 2015
 URS, 2011

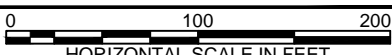



3478 BUSKIRK AVENUE, SUITE 100
 PLEASANT HILL, CA 94523


McNAMARA AND PEEPE
 LUMBER MILL
 ARCATA, CALIFORNIA

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**GROUNDWATER ELEVATION CONTOURS,
 PCP AND TCP CONCENTRATIONS IN
 GROUNDWATER
 MAY 2017**



HORIZONTAL SCALE IN FEET



**FIGURE
 4**

TABLES

Table 1
Groundwater Elevation and Field Parameters
 McNamara and Peepe Lumber Mill
 Arcata, California

Well	Screened Interval	Date	Depth to Water	TOC Elevation	Groundwater Elevation	Temperature	pH	DO	ORP	Conductivity	Turbidity	TDS
	(feet btoc)		(feet btoc)	(feet msl)	(feet msl)	(degrees C)	--	(mg/L)	(mV)	(mS/cm)	(NTU)	(mg/L)
MW-1	19-23	11/2011	3.19	90.92	87.73	14.39	5.80	0.95	134	NR ⁽¹⁾	57.6	NR
		5/13/2015	7.32		83.60	15.51	5.42	0.75	70.7	0.279	3.9	NR
		11/10/2015	11.15		79.77	18.39	5.61	1.27	121.3	0.281	-3.8 ⁽²⁾	NR
		5/23/2016	6.87		84.05	16.37	6.25	0.80	-15.1	0.479	3.1	372
		12/14/2016	3.00		87.92	13.20	6.69	2.89	150.1	0.491	3.6	319
		5/8/2017	5.00		85.92	15.50	6.00	0.21	102.7	0.546	46.8	355
MW-5	18-23	11/2011	5.21	93.25	88.04	14.37	5.88	0.99	-22	NR ⁽¹⁾	121	NR
		5/13/2015	9.40		83.85	14.65	5.15	0.87	183.7	0.243	1.1	NR
		11/10/2015	12.15		81.10	16.62	5.13	1.32	170.1	0.205	1.1 ⁽²⁾	NR
		5/23/2016	8.90		84.35	15.68	5.44	0.54	22.7	0.250	48.5	200
		12/14/2016	5.20		88.05	16.20	5.28	0.05	176.9	0.275	3.3	178
		5/8/2017	6.75		86.50	15.30	5.17	0.17	155.8	0.302	68.3	197
MW-7	22-37	11/2011	9.67	98.90	89.23	15.17	5.55	1.67	119	0.062	104	NR
		5/13/2015	13.63		85.27	16.86	5.28	1.55	151.3	0.095	1.4	NR
		11/10/2015	17.90		81.00	15.33	5.50	1.43	223.7	0.089	-2.8 ⁽²⁾	NR
		5/23/2016	13.33		85.57	18.15	5.70	2.01	17.3	0.130	5.9	96
		12/14/2016	9.82		89.08	16.80	5.60	2.34	237.2	0.108	15.1	NR
		5/8/2017	11.38		87.52	14.80	5.31	1.32	264.8	0.111	50.3	72
MW-8	8.5-24	5/13/2015	8.48	96.04	87.56	15.55	5.96	0.70	26.6	0.476	2.0	NR
		11/10/2015	11.40		84.64	18.03	5.40	1.80	190.5	0.712	3.5 ⁽²⁾	NR
		5/23/2016	8.72		87.32	16.12	6.22	0.82	-137.4	0.392	6.7	302
		12/14/2016	5.90		90.14	14.10	6.16	0.71	103.1	0.321	7.1	NR
		5/8/2017	7.80		88.24	13.60	5.96	0.68	14.4	0.495	48.3	321

Table 1
Groundwater Elevation and Field Parameters
 McNamara and Peepe Lumber Mill
 Arcata, California

Well	Screened Interval	Date	Depth to Water	TOC Elevation	Groundwater Elevation	Temperature	pH	DO	ORP	Conductivity	Turbidity	TDS
	(feet btoc)		(feet btoc)	(feet msl)	(feet msl)	(degrees C)	--	(mg/L)	(mV)	(mS/cm)	(NTU)	(mg/L)
MW-9	21-25	11/2011	6.27	99.65	93.38	14.26	5.64	1.18	408	NR ⁽¹⁾	33.6	NR
		5/13/2015	11.17		88.48	17.08	5.83	1.65	164.7	0.251	1.5	NR
		11/10/2015	14.29		85.36	17.30	5.70	1.79	465.7	0.178	-4.2 ⁽²⁾	NR
		5/23/2016	10.97		88.68	16.72	6.01	1.09	18.5	0.290	49.1	224
		12/14/2016	8.09		91.56	16.60	6.00	4.82	241.2	0.207	3.4	NR
		5/8/2017	8.99		90.66	14.40	5.69	1.47	465.7	0.301	70.3	196
MW-10	9-24	11/2011	9.74	95.65	85.91	12.12	5.22	7.14	207	0.013	68.1	NR
		5/13/2015	13.44		82.21	15.85	5.03	1.29	179.7	0.118	48.2	NR
		11/10/2015	16.15		79.50	16.93	5.32	1.79	180.5	0.039	36.4 ⁽²⁾	NR
		5/23/2016	13.36		82.29	15.28	5.37	2.91	57.1	0.094	48.3	74
		12/14/2016	5.70		89.95	11.70	5.80	9.28	217.0	0.020	24.1	NR
		5/8/2017	10.94		84.71	13.60	5.93	0.69	117.1	0.094	50.3	62
MW-11	9.5-24.5	11/2011	5.20	91.70	86.50	14.00	5.12	1.37	155	0.048	29.8	NR
		5/13/2015	7.80		83.90	16.88	5.04	0.78	202.8	0.086	1.5	NR
		11/10/2015	9.97		81.73	17.28	5.07	1.40	252.7	0.079	-4.4 ⁽²⁾	NR
		5/23/2016	7.25		84.45	16.42	5.16	1.74	64.8	0.145	0.3	111
		12/14/2016	4.24		87.46	16.90	5.01	0.57	214.9	0.260	4.2	NR
		5/8/2017	6.15		85.55	14.70	5.08	0.47	194.1	0.281	65.7	183

Table 1
Groundwater Elevation and Field Parameters
 McNamara and Peepe Lumber Mill
 Arcata, California

Well	Screened Interval	Date	Depth to Water	TOC Elevation	Groundwater Elevation	Temperature	pH	DO	ORP	Conductivity	Turbidity	TDS
	(feet btoc)		(feet btoc)	(feet msl)	(feet msl)	(degrees C)	--	(mg/L)	(mV)	(mS/cm)	(NTU)	(mg/L)
MW-12	10-20	11/2011	3.92	91.73	87.81	14.14	5.67	0.91	11	NR ⁽¹⁾	41.6	NR
		5/13/2015	8.20		83.53	14.69	5.28	0.81	167.3	0.189	31.7	NR
		11/10/2015	12.05		79.68	16.09	5.38	1.24	77.9	0.196	-1.1 ⁽²⁾	NR
		5/23/2016	7.75		83.98	15.19	5.55	1.01	10.1	0.230	4.1	184
		12/14/2016	3.80		87.93	14.40	5.42	0.52	240.2	0.228	4.3	NR
		5/8/2017	5.75		85.98	15.70	5.32	1.07	180.4	0.221	43.7	139

Notes:

Data prior to 2015 from URS (2011).

TOC = Top of casing

bgs = Below ground surface

btoc = Below top of casing

C = Celsius

DO = Dissolved oxygen

TDS - total dissolved solids

msl = mean sea level

mS/cm = Millisiemens per centimeter

mg/L = Milligrams per liter

mV = Millivolts

NTU = Nephelometric Turbidity Units

ORP = Oxidation Reduction Potential

NR = Not Recorded

⁽¹⁾ Conductivity not recorded due to equipment errors.

⁽²⁾ Negative turbidity readings during November 2015 considered suspect due to equipment errors.

Table 2
Groundwater Analytical Results - PCP and TCP
 McNamara and Peepe Lumber Mill
 Arcata, California

Well Name	Date	PCP	TCP
<i>CA MCL</i>		<i>1.0</i>	<i>NV</i>
<i>Analytical Method</i>		<i>Canadian Pulp Method</i>	
MW-1	7/31/1997	<0.30	<1.0
	1/12/1998	<0.30	<1.0
	4/8/1998	<0.30	<1.0
	7/8/1998	<0.30	<1.0
	10/10/1998	--	--
	1/26/1999	<0.30	<1.0
	7/14/1999	<0.30	<1.0
	4/13/2000	<0.30	<1.0
	10/19/2000	<0.30	<1.0
	6/7/2001	0.49	<1.0
	12/26/2002	<0.30	<1.0
	12/12/2003	1,100	19
	12/24/2003	720	11
	3/15/2004	1,100	15
	6/10/2004	900	19.8
	6/28/2005	890	11
	8/4/2005	890	14
	06/2010	0.34	<1.0
	10/2010	2,200	36
	11/2011	1,300	25
	4/2012	1,300	24
	5/13/2015	690	14
	5/13/2015 (FD)	560	12
	11/11/2015	610	120
	11/11/2015 (FD)	670	120
	5/23/2016	830	7.1
5/23/2016 (FD)	1,100	8.0	
12/14/2016	1.2	<1.0	
12/14/2016 (FD)	1.2	<1.0	
5/8/2017	570	8.4	
5/8/2017 (FD)	530	7.9	
MW-5	7/31/1997	<0.30	<1.0
	1/12/1998	<0.30	<1.0
	4/8/1998	<0.30	<1.0
	7/8/1998	<0.30	<1.0
	7/8/1998 (FD)	<0.30	<1.0
	10/10/1998	--	--
	1/26/1999	<0.30	<1.0
	7/14/1999	<0.30	<1.0

Table 2
Groundwater Analytical Results - PCP and TCP
 McNamara and Peepe Lumber Mill
 Arcata, California

Well Name	Date	PCP	TCP
CA MCL		1.0	NV
MW-5 (Cont.)	4/13/2000	<0.30	<1.0
	10/19/2000	<0.30	<1.0
	10/19/2000 (FD)	<0.30	<1.0
	6/7/2001	<0.30	<1.0
	6/7/2001 (FD)	0.68	<1.0
	12/26/2002	<0.30	<1.0
	12/26/2002 (FD)	<0.30	<1.0
	12/12/2003	<0.30	<1.0
	12/12/2003 (FD)	<0.30	<1.0
	1/28/2005	<0.30	<1.0
	1/28/2005 (FD)	<0.30	<1.0
	8/4/2005	<0.30	<1.0
	06/2010	1.7	<1.0
	10/2010	1.6	<1.0
	11/2011	5.1	<1.0
	4/2012	54	2.2
	5/13/2015	35	4.3
	11/11/2015	65	3.3
5/23/2016	56	1.6	
12/14/2016	39	2.3	
5/8/2017	46	2.3	
MW-6	7/31/1997	<0.30	<1.0
MW-7	1/12/1998	<0.30	<1.0
	4/8/1998	<0.30	<1.0
	4/8/1998	<0.30	<1.0
	7/8/1998	<0.30	<1.0
	10/10/1998	<0.30	<1.0
	1/26/1999	<0.30	<1.0
	1/26/1999	<0.30	<1.0
	7/14/1999	<0.30	<1.0
	4/13/2000	<0.30	<1.0
	4/13/2000	<0.30	<1.0
	10/19/2000	<0.30	<1.0
	6/7/2001	0.36	<1.0
	12/26/2002	<0.30	<1.0
	12/12/2003	<0.30	<1.0
	1/28/2005	<0.30	<1.0
	8/4/2005	<0.30	<1.0
8/4/2005 (FD)	<0.30	<1.0	

Table 2
Groundwater Analytical Results - PCP and TCP
 McNamara and Peepe Lumber Mill
 Arcata, California

Well Name	Date	PCP	TCP
CA MCL		1.0	NV
MW-7 (Cont.)	06/2010	<0.30	<1.0
	10/2010	<0.30	<1.0
	11/2011	<0.30	<1.0
	4/2012	<0.30	<1.0
	5/13/2015	0.39	<1.0
	11/11/2015	<0.30	<1.0
	5/23/2016	<0.30	<1.0
	12/14/2016	<0.30	<1.0
	5/8/2017	<0.30	<1.0
MW-8	1/12/1998	<0.30	<1.0
	4/8/1998	1.3	<1.0
	4/27/1998	<0.30	<1.0
	7/8/1998	<0.30	<1.0
	10/10/1998	--	--
	1/26/1999	<0.30	<1.0
	7/14/1999	<0.30	<1.0
	4/13/2000	<0.30	<1.0
	10/19/2000	<0.30	<1.0
	6/7/2001	<0.30	<1.0
	12/26/2002	<0.30	<1.0
	8/4/2005	<0.30	<1.0
	5/13/2015	<0.30	<1.0
	11/11/2015	<0.30	<1.0
	5/23/2016	<0.30	<1.0
	12/14/2016	<0.30	<1.0
5/8/2017	<0.30	<1.0	
MW-9	1/12/1998	<0.30	<1.0
	4/8/1998	<0.30	<1.0
	7/8/1998	<0.30	<1.0
	10/10/1998	<0.30	<1.0
	10/10/1998	<0.30	<1.0
	1/26/1999	<0.30	<1.0
	7/14/1999	<0.30	<1.0
	7/14/1999 (FD)	<0.30	<1.0
	4/13/2000	<0.30	<1.0
	10/19/2000	<0.30	<1.0
	6/7/2001	<0.30	<1.0
	12/26/2002	<0.30	<1.0
	8/3/2005	<0.30	<1.0

Table 2
Groundwater Analytical Results - PCP and TCP
 McNamara and Peepe Lumber Mill
 Arcata, California

Well Name	Date	PCP	TCP
CA MCL		1.0	NV
MW-9 (Cont.)	06/2010	<0.30	<1.0
	10/2010	<0.30	<1.0
	11/2011	<0.30	<1.0
	4/2012	<0.30	<1.0
	5/13/2015	<0.30	<1.0
	11/11/2015	<0.30	<1.0
	5/23/2016	<0.30	<1.0
	12/14/2016	<0.30	<1.0
	5/8/2017	<0.30	<1.0
MW-10	06/2010	<0.30	<1.0
	10/2010	<0.30	<1.0
	11/2011	<0.30	<1.0
	4/2012	<0.30	<1.0
	5/13/2015	<0.30	<1.0
	11/11/2015	<0.60	<2.0
	5/23/2016	<0.30	<1.0
	12/14/2016	<0.30	<1.0
	5/8/2017	<0.30	<1.0
MW-11	10/2010	0.84	<1.0
	11/2011	<0.30	<1.0
	4/2012	1.6	<1.0
	5/13/2015	<0.30	<1.0
	11/11/2015	0.67	<1.0
	5/23/2016	<0.30	<1.0
	12/14/2016	<0.30	<1.0
	5/8/2017	1.9	<1.0
MW-12	11/2011	24	<1.0
	04/2012	53	<1.0
	5/13/2015	52	<1.0
	11/11/2015	51	<1.0
	5/23/2016	120	<1.0
	12/14/2016	46	<1.0
		5/8/2017	81

Notes:

Data prior to 2015 from URS (2011).
 All results in micrograms per liter
 CA MCL = California Maximum Contaminant Levels
 PCP = Pentachlorophenol
 TCP = 2,3,4,6-Tetrachlorophenol

Table 2
Groundwater Analytical Results - PCP and TCP
 McNamara and Peepe Lumber Mill
 Arcata, California

Well Name	Date	PCP	TCP
<i>CA MCL</i>		<i>1.0</i>	<i>NV</i>

Embolden values: Analyte concentration exceeds laboratory reporting limit

Shaded values: Analyte concentration exceeds MCL

< = indicates value is below the noted laboratory reporting limit

NV = No established value

FD = Field duplicate

Table 3
Comparison of Primary and Duplicate Sample Analytical Results
 McNamara and Peepe Lumber Mill
 Arcata, California

Well Name	Date	PCP	TCP
MW-1	5/8/2017	570	8.4
	5/8/2017 (FD)	530	7.9
	RPD	7%	6%

Notes:

Analytical results in micrograms per liter

PCP = Pentachlorophenol

TCP = 2,3,4,6-Tetrachlorophenol

RPD = relative percent difference

FD = Field duplicate

NA = Not applicable