IV.D. Narrative Information Sheet

1) Applicant Identification
   a) Organization Name: Sierra Institute for Community and Environment
   b) Organization Address: P.O. Box 11, 4438 Main St. Taylorsville, Ca 95983

2) Funding Requested
   a) Grant Type: Single Site Cleanup
   b) Federal Funds Requested:
      i) Total Requested: $500,000.00
      ii) Cost share waiver: Yes

3) Location
   a) City: Crescent Mills
   b) County: Plumas
   c) State: California

4) Property Information
   a) Property name: Crescent Mills Former LP Mill Site
   b) Site address: 15690 Highway 89, Crescent Mills, CA 95934

5) Contacts
   a) Project Director:
      i) Danielle Berry
      ii) Phone Number: (530) 284-1022
      iii) Email Address: dberry@sierrainstitute.us
      iv) Mailing Address: P.O. Box 11, 4438 Main St. Taylorsville, CA 95983
   b) Executive Director:
      i) Jonathan Kusel
      ii) Phone Number: (530)284-1022
      iii) Email Address: jkusel@sierrainstitute.us
      iv) Mailing Address: P.O. Box 11, 4438 Main St. Taylorsville, CA 95983

6) Population
   a) Area of Target Populations: The targeted area for this project is the small ranching community of Indian Valley, home to approximately 2,500 people. The populated area includes the census designated places of Greenville (pop. 1,026 pre Dixie Fire), Crescent Mills (pop. 206; City where project is located), and Taylorsville (pop. 123) [Total Population 2019 ACS 5-Year Estimates].
7) **Other Factors Checklist**

<table>
<thead>
<tr>
<th>Other Factors</th>
<th>Page #</th>
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<tbody>
<tr>
<td>Community population is 10,000 or less.</td>
<td>Narrative pg. 1, 4, 5</td>
</tr>
<tr>
<td>The applicant is, or will assist, a federally recognized Indian tribe or United States territory.</td>
<td>X</td>
</tr>
<tr>
<td>The proposed brownfield site(s) is impacted by mine-scarred land.</td>
<td>X</td>
</tr>
<tr>
<td>Secured firm leveraging commitment ties directly to the project and will facilitate completion of the project/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation.</td>
<td>Narrative pg. 3, 4</td>
</tr>
<tr>
<td>The proposed site(s) is adjacent to a body of water (i.e., the border of the proposed site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).</td>
<td>Narrative pg. 1, 2</td>
</tr>
<tr>
<td>The proposed site(s) is in a federally designated flood plain.</td>
<td>Narrative pg. 2</td>
</tr>
<tr>
<td>The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy; or will incorporate energy efficiency measures.</td>
<td>Narrative pg. 3, 4, 6</td>
</tr>
<tr>
<td>The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures.</td>
<td>Narrative pg. 3, 4, 6</td>
</tr>
<tr>
<td>The Target area(s) is located within a community in which a coal-fire power plant has recently closed (2011 or later) or is closing.</td>
<td>X</td>
</tr>
</tbody>
</table>

8) **Letter from the State Environmental Authority**
   Included in narrative attachments.

9) **Releasing Copies of Applications**
   N/A
1. Project Area Description & Plans for Revitalization. a. Target Area & Brownfields. i. Background & Description of Target Area: The Target Area for this project is the small, predominantly ranching community of Indian Valley, California. Home to approximately 2,500 people, the area includes the Census Places (CDPs) of Greenville, Crescent Mills, and Taylorsville in rural Plumas County. The proposed remediation site is located in Crescent Mills, that lies at the intersection of the northern Sierra Nevada and southern Cascade Mountains, and is revered for its clean air and water, beautiful natural surroundings and geologic wonders. The county has a rich history of diverse land users including: Native American Tribes such as the Mountain Maidu, multi-generational ranching and logging families, as well as numerous other residents who moved from urban areas to enjoy peaceful, mountain settings to raise their families. With over a million acres of forestland, roughly 80% of which is federally-owned, this area forms the headwaters of the Feather River Watershed, a critical water source for the State Water Project that serves approximately 27 million Californians and 750,000 acres of farmland.

   Rural communities in Plumas County, including the Target Area, are heavily impacted by the compounding effects of the declining timber, mining, and building industries, as well as the Great Recession of 2008, which hit the area particularly hard. Climate change, drought, and catastrophic wildfire have added insult to injury. A century of reduced wood utilization and intense fire suppression has created a landscape with dense, insect and disease prone forests that are susceptible to catastrophic wildfire and contribute to declining watershed and socioeconomic health. According to the USFS 2017 report, Tree Mortality in the Pacific Southwest Region, between 2010-2017, 129 million trees died in California as a result of prolonged drought, higher temperatures and altered forest conditions: In 2021, California witnessed the second largest wildfire in history, the Dixie Fire. The Target Area lies at the heart of the Dixie Fire footprint. The fire began on July 13, 2021 and wasn’t fully contained until October 2021, having consumed over 960,000 acres. Roughly 45% of the Dixie Fire burned at high severity, destroying diverse forested landscapes, unique habitats, and communities, as economies and livelihoods were consumed by flames and stifled by smoke. Despite all of this, the Sierra Institute is committed to collaborating with our numerous partners and community members to advance efforts to help the region recover from the Dixie Fire, increase the pace and scale of forest restoration efforts that build resilience against climate stressors, create jobs, and develop the next generation of stewards. The impacts of the wildfires across the West emphasizes the importance of our work as we strive to improve the health of our forests and watersheds as well as the many communities that rely upon them.

   In addition to the challenges brought forth by socioeconomic declines and the lack of social and financial capital, local redevelopment efforts are challenged by a lack of new or existing sites suitable for development. 2/3s of Plumas County is public land – private parcels are situated on rough terrain or located far from primary transportation routes, driving up development costs. Few parcels are zoned for heavy industry. For these reasons, communities within the region rarely garner support from investors and have been continuously challenged to improve socioeconomic conditions since the mid-1980’s. Opportunities for revitalization lie primarily in the form of abandoned industrial sites formerly home to sawmill and other industrial operations. These sites often require remedial actions prior to development – a time consuming and expensive process that many rural communities lack the capacity and resources to pursue.

ii. Description of the Brownfield Site. The location for this cleanup grant is within a 28-acre property ("Property") formerly owned by Louisiana Pacific and operated as a sawmill until it closed in the mid-1980s. Sierra Institute (SI) obtained ownership in 2017. It lies immediately off of Highway 89 in Crescent Mills, within the Indian Valley community, and located at 15690 Highway 89, Crescent Mills, California, 95934. No structures remain on the Property from sawmill operations, but a number of structural remnants including asphalt, concrete footers, and railing remain. The Property runs parallel between Indian Creek, a tributary of the North Fork of the Feather River, and Highway 89 through the Crescent Mills. A BNSF rail line and spur track runs between the Property and Highway 89. The populated area of Crescent Mills is located west of the Property, with some houses abutting the railroad line that separates them from the Property. The eastern edge is bordered by a wetland mitigation site owned by Caltrans, the state transportation department.
The focus of this proposal is a nine-acre site in the southernmost portion of the property that is designated as the “Southern Stockpiles Area.” The site includes two large stockpiles of soil, rocky sediment and decomposed wood waste excavated during Caltrans’ wetlands mitigation work on an adjacent property. The site has elevated arsenic concentrations exceeding property’s background levels. Treatment involves regrading, compacting, leveling and capping with clean fill to provide an additional six acres of redevelopment land. Drainage improvements will be implemented in the area surrounding the remediated area to contain site runoff. This parcel was characterized during a 2017 Targeted Site Investigation and a 2017 Community Wide Brownfield Assessment Grant (99T61701) but has yet to be addressed by any cleanup activities.

Site assessments completed to date include: Preliminary Assessment/Site Inspection Report (Ca DTSC, 1990); Property Transfer Site Assessment (CH2M Hill, Inc., 1991); Supplemental Site Investigation Report (Geocon Consultants, Inc., 2002); Phase I ESA (Ecology & Environment Inc.(E&E), 2014); Targeted Brownfield Assessment (E&E, 2014); Targeted Site Investigation (TSI, Geosyntec Consultants, 2017); and Site Characterization, Removal Action Workplan and Appendices ([RAW], SI, Sierra Streams Institute, and EKI Environment & Water Inc.). The assessments identified arsenic and total petroleum hydrocarbon (TPH) contamination on the Property as a result of mill practices such as spreading oil and incinerator ash on the roadways, and chemical treatment of wood products. The Phase I assessment identified tanks that were removed and monitoring wells were installed under the guidance of the California State Water Resources Control Board. As a result of these assessments, continued oversight was deemed unnecessary.

Arsenic in soil appears to be the most widespread soil contaminant (TSI, 2017). Groundwater tests indicate that the arsenic in the soil has not resulted in groundwater impacts. The source of arsenic that is present on the Property may be related to lumber mill operations as identified above, but may also have been present in the import fill material brought to the site to raise the surface grade. Imported fill was likely derived from off-site gold mining operations that are commonly associated with the presence of arsenic. The level of arsenic concentrations in shallow soil exceeds the established 9.8 mg/kg background levels across several areas of the Property.

As with many of the brownfield sites in Plumas County, the Property lies within the Feather River Watershed, which is part of the California’s State Water Project. The project delivers water to over two-thirds of California’s population and provides an average of 3.2 million acre-feet of water per year to downstream urban, industrial, and agricultural users. The Property is also adjacent to Indian Creek, a tributary of the North Fork of the Feather River, with the eastern portion in the federally designated 100-year flood plain. A majority of the site has been flooded, some parts numerous times, suggesting contaminated soil has repeatedly washed into the creek exposing Humans and wildlife to negative environmental impacts from contaminated soil that is deposited in downstream areas of the watershed. Water quality impacts include potential exposure to suspended sediment or dissolved contaminants, now more likely to occur following the devastating Dixie Fire. The latter underscores the importance of remediating contaminated sites in order to minimize the amount of toxins washing downstream and negatively affecting beneficiaries and critical habitats.

Over the past four years, SI has successfully completed four stages of remediation resulting in nearly 7-acres of clean land available for redevelopment. Redevelopment efforts on these clean acres have been successfully initiated through the creation of a wood chip processing business to supply a local biomass boiler and a community scale lumber mill aimed at utilizing burned material from the 2021 Dixie Fire to support and expedite the sustainable and economically feasible redevelopment of the town Greenville and other local communities obliterated by the fire. This new site focuses on a 9-acre unit located on the southernmost portion of the Property. Work completed to date includes: on-site relocation of stockpiled soil and wood waste (14,000 cy); excavation of clean on-site fill and placement over contaminated areas (14,700 cy); demolition of remnant concrete foundations; on-site processing of concrete and asphalt debris to create aggregate (1,200 cy) and disposal of rebar and metal debris; and placement of crushed concrete aggregate as fill as cap in key redevelopment areas (1,200 cy). An additional 2,000 cubic yards of clean fill material has been identified from the on-site borrow area and is scheduled to be placed during the spring and summer of 2022 utilizing the remainder of existing Brownfield funds for separate sites. An additional off-site source of clean fill has been identified and is currently being
imported to the site from demolished concrete from burned properties in Greenville which will be crushed on-site and used as fill for site redevelopment.

b. Revitalization of the Target Area i. Reuse Strategy & Alignment with Revitalization Plans. SI has been working to redevelop the Property into an integrated wood products campus for eight years with partners as described below (2.b.i & ii). The campus will utilize a variety of technologies to generate value-added wood products out of low-value woody material from forest restoration and fire risk reduction efforts. Site reuse has begun with the first business: a wood chip storage and processing yard that supplies chips to the boiler in the Plumas County Health and Human Services building in Quincy, California; a saw mill is the second business being launched. It is owned by SI and operated by local contractor J&C Enterprises to mill burned logs to make lumber and speed Dixie Fire rebuilding. Future businesses to be developed include: dried/packaged firewood operation (early 2022), cross-laminated timber production facility, and a biomass to hydrogen production facility. This wood products campus supports a struggling forest products industry, a major employer in the northern Sierra region. It also supports wood biomass utilization from forest restoration and hazardous fuels reduction activities, desperately needed to reduce fire risk in this high-risk area.

The reuse of this Property aligns with the Plumas County General Plan (“General Plan”), which calls for greater utilization of biomass to reduce forest fuel buildup and to increase use of renewable fuels. Remediation and redevelopment of the Property is supported by the County Board of Supervisors, Community Development Commission, and Plumas County Department of Environmental Health, and will help to achieve the goals of the General Plan including: 1) Create and retain jobs, and reinvest wealth through our economy, community, and natural resources; 2) Improve health and well-being of all Plumas County residents; and 3) Promote a future for Plumas County citizens in which land use decisions balance social, economic, and natural resource health.

The proposed reuse for the property also aligns with California Governor Brown’s October 2015 Emergency Proclamation on tree mortality for increased forest restoration efforts and provides an outlet for dead tree material. The chip sorting and storage operation already accepts small diameter trees and other woody biomass from local forest restoration and wildland-urban interface fuels reduction projects. The ability to utilize this material reduces the number of pile burns in the forest and contributes to decreased wildfire risk, thereby improving air quality for Plumas County residents. The proposed reuse is also in line with the California Natural Resources Agency’s SB 859 Wood Products Working Group Recommendations to Expand Wood Products Markets in California (2017) that outlined three goals: 1) Remove state barriers and create pathways to success, focusing on challenges to redeveloping sites, 2) Promote innovation, focusing on building the institutional infrastructure necessary to bring new wood products to market, and 3) Invest in human capital, focusing on assuring the necessary workforce is available and trained appropriately to staff new wood products operations. These recommendations are repeated in the State’s 2018 Forest Carbon Plan and in the Joint Institute for Wood Products Innovation’s 2020 Draft Recommendations for Wood Biomass Utilization. Specifically, the Joint Institute recommends “to identify any statutes that unnecessarily restrict the conversion of brownfield sites to forest product and/or bioenergy facilities” and to create brownfields coordinators to redevelop these sites.

Plumas County is within the sphere of influence of the Sierra Economic Development Corporation which identifies biomass utilization as one of two region wide development priorities and calls for “the continued exploration of the economic, environmental and triple bottom-line benefits of managing our forest by-product material. SI prioritizes utilizing sustainable development practices while redeveloping the Property. For example, the wood products campus will support broader efforts to improve local air quality – businesses on site will provide a local outlet to send forest biomass material, which is otherwise burned in piles in the woods and releases harmful emissions. Establishing wood utilization businesses will also help to increase the pace and scale of nearby forest restoration and fuels reduction activities and reduce the risk of catastrophic wildfire.

ii. Outcomes and Benefits of Reuse Strategy. As a designated Opportunity Zone in Plumas County, the remediation and redevelopment of the Property as a wood utilization campus will catalyze revitalization in the Target Area. The proposed operations include businesses that will generate value-added products out of low value
woody material coming from forest restoration, post-fire remediation and wildfire risk reduction activities. The current heart of the campus is a sawmill that will be followed by a biomass to hydrogen facility which will convert biomass to a renewable fuel and help California reach its carbon neutral goals. The campus will create a number of local jobs, spurring additional economic development. Secondary jobs resulting from the campus build include but are not limited to: forestry, social and environmental specialists, truck drivers/haulers, woods workers, and a variety of managerial and administrative positions.

At full build out, the campus will: 1) Provide an outlet for burned trees from the Dixie Fire and dead trees from prolonged drought and beetle kill that are currently widespread across the Sierra Nevada, posing a fire hazard; 2) Increase the incentives for local forest managers to conduct forest and watershed restoration and hazardous fuels reduction treatments to improve forest health and reduce the risk of catastrophic wildfire; 3) Improve air quality for local residents by reducing the amount of forest biomass openly burned; 4) Strengthen the local economy in Indian Valley through development of new wood-product businesses; and 5) Develop between 15 and 30 jobs at the site for the socio economically-depressed communities of Indian Valley and Plumas County—the cleanup itself will generate a temporary work opportunity for at least 3-4 people. This does not account for numerous off-site jobs needed to ensure a steady supply of biomass.

c. Strategy for Leveraging Resources i. Resources Needed for Site Reuse. Funding ($3,942,575) has been secured from a variety of sources to support site assessment, cleanup and redevelopment efforts that are described in this document. Sources of funds leveraged to support Property redevelopment are listed in the attachment (Table 1).

ii. Use of Existing Infrastructure. The Property’s historic use as a sawmill provides an optimal foundation for wood products campus development. The site is 28 acres and zoned “Heavy Industry,” with approximately 11 acres previously graded and/or paved for mill operations. The site is adjacent to a BNSF main line and spur track, historically used for transporting materials to and from the sawmill. SI has initiated the development of the wood products campus and supporting infrastructure (Quincy boiler, chip sorting equipment, hauling equipment, sawmill, etc.) through funding from various federal, state, and private sources. Additional infrastructure needs key to the revitalization plan include a biomass to hydrogen facility, additional biomass boilers throughout Plumas County, and other wood extraction and utilization operations. SI continues its search for additional funding.

2. Community Need & Engagement. a. Community Need for Funding.

Table 2: Selected demographic factors comparing the Target Areas against regional, state, and national standings.

<table>
<thead>
<tr>
<th>Demographic Factors*</th>
<th>United States</th>
<th>California</th>
<th>Plumas County</th>
<th>Crescent Mills</th>
<th>Greenville</th>
<th>Taylorsville</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Population¹</td>
<td>331,449,281</td>
<td>39,538,223</td>
<td>19,970</td>
<td>206</td>
<td>1,026</td>
<td>123</td>
</tr>
<tr>
<td>Median Household Income²</td>
<td>$65,712</td>
<td>$80,840</td>
<td>$55,359</td>
<td>-</td>
<td>$26,875</td>
<td>$250,000**</td>
</tr>
<tr>
<td>American Indian and Alaska Native¹</td>
<td>1.1%</td>
<td>1.6%</td>
<td>2.3%</td>
<td>10.7%</td>
<td>9.5%</td>
<td>8.9%</td>
</tr>
<tr>
<td>Hispanic or Latino¹</td>
<td>18.7%</td>
<td>39.4%</td>
<td>9.6%</td>
<td>5.8%</td>
<td>8.7%</td>
<td>7.3%</td>
</tr>
<tr>
<td>Unemployment Rate³</td>
<td>4.5%</td>
<td>5.1%</td>
<td>5.4%</td>
<td>0.0%</td>
<td>16.5%</td>
<td>0.0%</td>
</tr>
<tr>
<td>Below Poverty Level⁴</td>
<td>12.3%</td>
<td>11.8%</td>
<td>12.1%</td>
<td>46.2%</td>
<td>28.8%</td>
<td>0.0%</td>
</tr>
<tr>
<td>Households Receiving Cash Public Assistance or Food Stamps/SNAP⁴</td>
<td>11.4%</td>
<td>9.35%</td>
<td>8.2%</td>
<td>0.0%</td>
<td>6.7%</td>
<td>0.0%</td>
</tr>
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</table>

¹) no data available
1. Data from 2020 Decennial Census. 2. Dollar amount in 2019 inflation adjusted dollars. Data from 2019 ACS 5-Year Estimates. 3. For the civilian population in the labor force 16 years and over. Data from 2019 ACS 5-Year Estimates. 4. Data from 2019 ACS 5-Year Estimates.
* Impacts from the Dixie Fire are not accounted for in this table. **This number is misleading given the small population and presence of a few wealthy landowners in the area.
Table 2 provides data on selected demographic factors that highlight social and economic hardships faced by communities within the Target Area of this proposal in comparison to county, state, and national standings based on the 2019 American Community Survey (ACS) 5-Year Estimates. Plumas County struggled economically even before the Great Recession of 2008, and mirrors stagnant timber industry communities elsewhere. The county’s timber-based economy is seasonal, with forest workers laid off in winter, hence, winter months typically have the highest rates of unemployment during the year—above 20%. The 2019 unemployment rate of 5.4% for Plumas County is greater than the rates for most counties in the state, and higher than California and the United States, at 5.1% and 4.5%, respectively. Plumas County’s population has been decreasing over the past decade. Plumas County has been designated as one of fifteen “Frontier Counties” of California due to its small population and geographic isolation. The County has no economic development agency, thus it is difficult to raise capital for developing business opportunities and attracting experienced entrepreneurs to advance business development.

Greenville has long been one of the most impoverished communities in the county. The ACS estimates a poverty rate of 28.8% (compared to 12.1% for Plumas County and 11.8% for California). The Target Area far exceeds national, state, county, and local poverty rates and none of these data capture the devastation wrought by the 2021 Dixie Fire. Eligibility among children for Free or Reduced-Price Meals in Indian Valley is 56.9% for the 2019–2020 school year, 6.3% higher than the 2018–2019 school year (Education Data Partnership, 2020). Indian Valley’s small population has extremely limited capacity to initiate and sustain economic development. Further, due to the remoteness of this area there are few existing linkages to markets to raise funds necessary to assess and remediate sites such as Crescent Mills.

Until recently, the impacts of the declining timber industry were softened by a coinciding increase in tourism and construction of second homes in Plumas County. Plumas County retained its timber industry due to the presence of two mills, but the local economy shifted from a resource-based economy to one more dependent on construction and service industry jobs. The Great Recession worsened economic conditions in Plumas County, and unemployment reached a high point of 16.8% in 2010, with some communities experiencing rates over 20%. In addition to devastating towns and the landscapes, the Dixie Fire will challenge the tourism and recreation sector underscoring the need to redevelop the mill site to address both forest restoration and the area’s economy.

Beyond the impoverished nature of Plumas County, this funding is essential because the applicant, SI, is a non-profit organization and does not have the reserves needed to complete this work. The past eight years of work dedicated by the organization has enabled industry redevelopment and community revitalization efforts to begin on what would have otherwise remained a vacant, contaminated site.

**ii. Threats to Sensitive Populations. 1. Health or Welfare of Sensitive Populations.** Demographic indicators comparing the Target Area to state, regional, and national standings reveal that the Target Area is within the 56th, 56th, and 57th percentiles respectively for low-income populations; the 12th, 14th, 45th percentile respectively for minority populations; the 88th percentile for children (under age of 5), and 51st, 50th, 40th percentile respectively for persons over the age of 64. In addition, the American Indian population of Crescent Mills (27.9%) far exceeds county (2.3%), state (0.8%), and national (0.8%) levels. The remediation of the site will directly reduce threats to the health and welfare of sensitive population by preventing ongoing exposure to harmful contaminants that likely would have gone unaddressed in perpetuity given the lack of local capacity to fund and navigate site remediation.

**2. Greater Than Normal Incidence of Disease & Adverse Health Conditions.** Compared to national data, Indian Valley is within the 54th percentile for NATA Air Toxics Cancer Risk and 53rd percentile for NATA Respiratory Hazard Index. Emergency department visits due to asthma in Plumas County exceed state occurrences with 61.1 per 10,000 people; this number is likely to increase as the area continues to be subjected to catastrophic wildfire and associated hazardous smoke emissions. In 2015, 100% of 72 children tested positive for childhood lead poisoning and in 2016 11.6% of the adult population was diabetic (up 2% from the previous year). Historically, Plumas County also has a higher death rate 302 people per 100,000 when compared to the state (151)
and the nation (185) (CDC Cancer Data 2013). As common throughout rural communities of the Sierra, environmental and health statistics are limited and fail to comprehensively and accurately reflect local conditions.

3. Promoting Environmental Justice. Environmental issues faced by Plumas County residents in the Target Area can be primarily attributed to declining forest and watershed health as a result of prolonged drought, changing climate, and a century of forest management that has altered the structure of California’s forests. Indian Valley has repeatedly endured the social, environmental, and economic impacts associated with large wildfires. Recent occurrences include: the 2007 Moonlight Fire (65,000 acres [ac.]); the 2012 Chips Fire (75,000 ac.); the 2019 Walker Fire (54,000 ac.); the 2020 North Complex Fire (318,900 ac.); and the 2021 Dixie Fire (over 963,300 ac.). The Dixie Fire spanned five counties; destroyed over 1,200 structures; devastated the rural mountain communities of Indian Falls, Greenville, and Canyon Dam and the region's natural resources. Smoke from fires such as these settle in Indian Valley and nearby communities for weeks to months exposing the population to significantly increased levels of three primary pollutants: 1) particulate matter (PM 2.5 and PM 10), 2) ground level ozone, and 3) carbon monoxide, which contribute to increased rates of respiratory, cardiovascular, and other related illnesses. Mental health impacts from fire are profound and similar to Post Traumatic Stress Syndrome.

In addition to the negative environmental and health impacts brought forth by wildfires, Plumas County residents are also impacted by open pile burning. Pile burning is the primary method for disposal of material generated from fuels reduction projects in the county, but the process creates harmful emissions like fine particulate matter and reduces air quality in the county’s populated valleys. Poor air quality resulting from wildfires and pile burning contribute to increased rates of respiratory and cardiovascular illnesses and directly affect sensitive populations in the Target Area where poverty is high and access to proper health care services is limited.

Redevelopment of the Property into a wood products campus with a biomass to hydrogen facility that provides a local outlet for woody biomass will contribute to improved air quality produce renewable energy. Converting biomass to hydrogen is one of the cleanest ways of managing forest waste as it produces few emissions. Thus, the remediation and subsequent campus development will help address some of the underlying health issues in the local area from previous industrial activities as well as current environmental hazards.

b. Community Engagement. i. Project Involvement & ii. Project Roles.

<table>
<thead>
<tr>
<th>Partner Name / contact</th>
<th>Description / Specific Role in the Project</th>
</tr>
</thead>
<tbody>
<tr>
<td>Plumas County Board of Supervisors, Kevin Goss, <a href="mailto:kevin.goss4district2@gmail.com">kevin.goss4district2@gmail.com</a>, (530) 368-6110</td>
<td>Supports the redevelopment of the site, especially the development of a wood utilization campus.</td>
</tr>
<tr>
<td>Plumas County Department of Environmental Health, Rob Robinette, <a href="mailto:RobRobinette@countyofplumas.com">RobRobinette@countyofplumas.com</a>, (530) 283-6355</td>
<td>Provides technical and permitting assistance for assessment and cleanup efforts.</td>
</tr>
<tr>
<td>Plumas County Community Development Commission, (530) 283-2466</td>
<td>Is the awardee of the 2017 EPA Brownfield Assessment Grant; coordinated assessment efforts with sub-awardees</td>
</tr>
<tr>
<td>Plumas County Planning Department, Tracey Ferguson, <a href="mailto:traceyferguson@countyofplumas.com">traceyferguson@countyofplumas.com</a>, (530) 283-7011</td>
<td>Provides technical and permitting assistance for cleanup and redevelopment efforts.</td>
</tr>
<tr>
<td>USDA Rural Development</td>
<td>Supported redevelopment and wood utilization in Indian Valley for Rural Community Development Initiative</td>
</tr>
<tr>
<td>U.S. Forest Service, Dave Kinateder, <a href="mailto:david.kinateder@usda.gov">david.kinateder@usda.gov</a>, 530-283-7671</td>
<td>Supports the development of a local wood products campus that can utilize small diameter trees and other woody biomass from forest restoration projects.</td>
</tr>
</tbody>
</table>
Feather River Resource Conservation District; (530) 927-5299 | Works with Caltrans to restore adjacent wetland mitigation site. Provides input on cleanup and redevelopment efforts.

Caltrans, Kelly Kawsuniak, Kelly.m.kawsuniak@dot.ca.gov, 530-225-2789 | See Feather River RCD role above. Is also coordinating with the SI to explore options for suitable fill material.

Plumas County Fire Safe Council
Hannah Hepner, plumasfiresafe@plumascorporation.org, (530) 927-5281 | Coordinates with the SI to identify outlets for forest biomass coming from their fuels reduction projects. Crescent Mills has already been used to store chips from a local WUI fuels reduction project for use in the Quincy boiler.

Center for Creative Land Recycling (CCLR)
Ignacio Dayrit, ignacio.dayrit@cclr.org, (415) 728.3848 | Supported assessment and cleanup efforts to date. Provides technical assistance on the cleanup process and provides connections to experienced brownfield professionals.

Crescent Mills, Greenville, & Taylorsville CDPs, N/A* | Supplies information regarding historic site uses. Provides input on future development ideas and community needs.

* Due to the small size of Indian Valley, there are a very limited number of community organizations; however, SI frequently reaches out to various community members for support.

iii. Incorporating Community Input. Due to the small and dispersed nature of our community, it is difficult to reach a large audience. SI pursues a variety of measures to ensure residents are apprised of the project and that there are sufficient opportunities to provide feedback. Strategies to engage and inform include: virtual community meetings, press releases in the local newspaper, social media updates, flyers, web-based information, as well as through informal networking. SI will continue to communicate with reporters from Plumas News to ensure updates are published in the paper and update their “Brownfields Program” section on its website, which provides regular updates and resources for other forested communities interested in brownfield redevelopment. Relevant project updates will also be shared directly with the county Board of Supervisors. To mitigate exposure and risk associated with Covid-19, SI prioritizes virtual outreach and other socially distant events.

Results and lessons learned from the project will continue to be shared by SI with its network of forest collaboratives. Dissemination of information and resources with these groups and associated communities will increase awareness of the remediation process in California for assessing, cleaning up, and removing liabilities associated with brownfields. Moreover, it will help build rural community capacity and success around biomass utilization, brownfield assessment, and site redevelopment.

3. Task Descriptions, Cost Estimates, & Measuring Progress. a. Proposed Cleanup Plan. The primary constituent of concern at the Site is arsenic in the soil. Following an ABCA, SI cleanup involves capping with institutional controls. This method includes laying clean fill as a cap and barrier to contaminated soil in areas where arsenic levels are above background levels. Institutional Controls in the form of land use covenants will be recorded to limit future use of the property to industrial use. This strategy requires ongoing monitoring and maintenance of the cap over time. The capping method is cost effective and can be instituted relatively quickly. It allows for timely redevelopment of the property, and effectively ensures the health and safety of workers on site. This remedy is described in detail in the official RAW finalized in August 2019. If awarded, SI will continue cleanup and redevelopment immediately after execution of the cooperative agreement.

b. Description of Tasks/Activities & Outputs.

| Task 1: Programmatic Management, Oversight and Reporting |
| i. Project Implementation: provides funds for SI staff oversight and overall project management costs, including communicating with EPA project officer, selecting qualified contractor to perform cleanup implementation, managing project budget, developing progress reports (consistent with EPA reporting requirements and process), developing the final project report, and other project oversight activities |

| ii. Anticipated Project Schedule: FY Quarter 3 2022 to FY Quarter 3 2025 |
Task 2: Community Engagement and Outreach

i. Project Implementation: SI staff will implement a community engagement process in the Indian Valley/Crescent Mills area to inform and ensure residents are aware of the cleanup process, and provide opportunities for public comment and input. SI will also share lessons learned and results with a statewide peer learning network of rural forested communities working to redevelop brownfields for biomass utilization campuses. Personnel funds will be used to support staff time and supply costs needed for enhancing public awareness of the project (including posters, signs) and for informational meetings (including fact sheets, posters, and other informational documents), and to maintain web-based information.

ii. Anticipated Project Schedule: FY Quarter 3 2022 to FY Quarter 3 2025

iii. Task/Activity Lead(s): Jonathan Kusel & Danielle Berry

iv. Output(s): Presentation and outreach materials.

Task 3: Cleanup Implementation

i. Project Implementation: Funds for a cleanup remedy on the southeastern portion of the site as described above, to be conducted by the selected remediation contractor. The site will be cleaned up in accordance with the completed RAW. Work will be performed in accordance with applicable federal, state and local regulations. Cleanup activities include soil capping and stockpile relocation. The RAW describes cleanup activities and institutional controls.

ii. Anticipated Project Schedule: Primarily FY Q3 2022 and FY Q1 2023 with remaining work to be completed as needed FY Quarter 4 2023 to FY Quarter 1 2024

iii. Task/Activity Lead(s): Jonathan Kusel & Danielle Berry

iv. Output(s): Soil capping, and a Removal Action Cleanup Report

c. Cost Estimates Table 3. Budget Summary

<table>
<thead>
<tr>
<th>Budget Categories</th>
<th>Task 1: Project Management and Reporting ($)</th>
<th>Task 2: Community Outreach ($)</th>
<th>Task 3: Cleanup Implementation ($)</th>
<th>Total ($)</th>
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<td>Personnelf Costs: $43,875 Travel Costs*: $1,202.88</td>
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<td>$11,174.44</td>
<td>$522,493.68</td>
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</tbody>
</table>

Task 1: Programmatic Management, Oversight, & Reporting - Personnel Costs: $43,875 for SI staff time including Executive Director, Project Manager, and Financial Manager. Travel Costs*: 1) To Crescent Mills to facilitate, report on, and coordinate cleanup efforts- 12 miles roundtrip, 31 trips = $208.32; 2) To Quincy to provide updates to local government and other interested organizations- 44 miles roundtrip, 4 trips = $98.56; 3) To Sacramento to provide updates and distribute lessons learned to other agency personnel – 300 miles round trip, 2 trips = $366.00; 4) Additional funds to conference(s)/workshop(s) yet to be determined relevant to
brownfield cleanup = $560. Supply Cost: Supplies for miscellaneous office needs including but not limited to, printing, postage, phone, and computer supplies = $500. 

Other Cost: 1) Sub-award to Sierra Streams Institute to advise project = $20,754.00; 2) Permit fees for California State Water Resources Control Board Stormwater Pollution Prevention Plan (SWPPP) [$904], building permits from Plumas County, and other required permits to be determined = $2,904. Cost Share: $0

Task 2: Community Engagement & Outreach - Personnel Costs: $8,055 for SI staff to lead this task. Travel Costs*: 1) To Crescent Mills to provide community updates and facilitate public engagement- 12 miles roundtrip, 3 trips = $20.16; 2) To Quincy to provide updates and facilitate public engagement with local community members, organizations, and government and other interested organizations- 44 miles roundtrip, 2 trips = $49.28. Supply Cost: Supplies for outreach meeting materials including printing and expenses associated with informational handouts = $500. Other Cost: 1) Sub-award to Sierra Streams Institute to advise and participate in community outreach efforts (assumes three visits to Crescent Mills) = $2,550. Cost Share: $0

Task 3: Cleanup Implementation - Personnel Costs: $13,920 for SI staff to oversee, coordinate, and report on implementation/ construction activities. Travel Costs*: 1) To Crescent Mills to provide implementation/construction oversight and conduct inspections and monitoring as needed- 12 miles roundtrip, 100 trips = $672; 2) To Quincy to for permitting purposes and to coordinate with and report to state and local officials- 4 trips, 4 miles round trip = $98.56. Contractual Cost: 1) Cleanup implementation on 9 acres = $342,450; 2) Compaction testing = $7,000; 3) SWPPP inspections and reporting = $7,000; 4) Engineering and construction management = $5,000; 5) Hydroseeding = $23,403.12 and 6) other contractual activities as needed to carry out remedial efforts = $4,400. Other Cost: 1) Sub-award to Sierra Streams Institute for cleanup implementation supervision and reporting = $19,550. Cost Share: $100,000.00 from fill.

(*) Travel costs estimated using IRS Mileage Reimbursement Rate. See additional information regarding the cost share in the Threshold Criteria attachment (14).

d. Measuring Environmental Results. Outputs include: Quarterly Progress and final reports, 2-3 community meetings and supporting documentation, project updates for community via local news outlets, soil capping and site cleanup, and a cleanup report, all tracked quarterly throughout the grant term.

Outcomes include: Remediation of ~9 acres; reduced community exposure to Property contaminants; increased community awareness; and several temporary jobs during cleanup activities. Acres remediated, exposure reduction, and jobs created will be tracked through Progress and Final reports. Long-term outcomes include utilization of at least 35,000-50,000 bone dry tons of biomass per year, equivalent to treating annually 3,000 – 5,000 acres of forest land for restoration and reduced fire risks. A fully developed wood products campus will include 3-4 new businesses in Crescent Mills, generating between 15 - 35 jobs.

4. Programmatic Capability & Past Performance. a. Programmatic Capability. i. Organizational Structure & ii. Description of Key Staff. This Cleanup Grant will be managed by a program lead, with overall oversight by an executive director/program director. SI’s financial manager will be responsible for managing finances and submitting invoices to the EPA’s invoicing system.

For over 25 years, SI has successfully managed a variety of local, regional, and national projects, along with local and regional networking projects. The organization has been engaged in forest issues since it was launched in 1993, and has actively focused on woody forest biomass utilization as an integral part of reducing risk of catastrophic wildfire, creating local jobs, and improving the ecological condition of forests since 2009. SI is active in state and federal policy discussions, and works with multiple community organizations and businesses involved in the development of community-scale biomass utilization.

Dr. Kusel is the founder and the Executive Director of the SI. He received his Ph.D. from the University of California Berkeley in natural resource sociology and policy, and a Masters of Forest Science from Yale School
of Forestry and Environmental Studies. He has led the organization for over 25 years, working to help rural communities thrive by bringing people and ideas together to improve socioeconomic conditions and natural resource management. Dr. Kusel led both the community assessment and public involvement teams for the Congressionally funded Sierra Nevada Ecosystem Project.

Danielle Berry is the Stewardship Project Manager at SI and is involved in the collaborative forestry and biomass utilization. Ms. Berry currently serves as the Project manager for ongoing cleanup efforts at Crescent Mills. She received her M.S. in Environmental Policy and Management from University California Davis and has over six years of professional experience in a variety of natural resource fields. Prior to joining SI, she served as the environmental compliance specialist for a design build contractor working on the California High Speed Rail. Ms. Berry has been involved in the management, coordination and implementation of cleanup activities at the Property and will continue to serve this role.

iii. Acquiring Additional Resources. To date, SI has successfully secured contractors and subrecipients necessary to carry out assessment and implement cleanup activities which were supported through funds identified in Table 1. A subrecipient (SSI) and multiple contractors (NST Engineering, J&C Trucking, and various construction contractors) have been deeply involved in Property assessment and cleanup efforts and they are expected to continue this work. SI will conduct cost analysis and create new contracts for all new product and service needs in accordance with procurement provisions of 2 CFR Part 200.

b. Past Performance & Accomplishments. i. Currently Has or Previously Received an EPA Brownfields Grant. SI has received three EPA Brownfields Grants. The agreements resulting from the awards are providing funding to clean up multiple brownfields sites on the Property. This funding enables the revitalization of the former lumber mill into the wood products campus and is creating local sustainable jobs. Work under this grant to date is outlined in Section 1.A. ii.

1. Accomplishments. Utilizing funding secured to date, SI and partners successfully completed a variety of site assessments/characterization reports (Section 1.a.ii). This has allowed cleanup to be completed on ~7- acres with additional acres in progress; this work is expected to be completed by the summer of 2022. Additional outcomes and outputs include a variety of public engagement efforts (meetings, news bulletins, etc.) that increase awareness of Property cleanup and redevelopment – the work is widely supported throughout the county.

2. Compliance with Grant Requirements. SI has maintained compliance with the work plan, schedule, and terms and conditions under the current cleanup grants. Many outputs for the project have already been completed (or are ongoing throughout the duration of the project) including: 1) quarterly performance reports, contractor selection documentation, Regulatory oversight reporting, ACRES reporting; 2) creation, distribution, and documentation of public engagement materials; and 3) documentation of Addressing Changing Climate Concerns in the ABCA, and assessment/cleanup documents listed in Section 1.a.ii.

Progress towards achieving expected results has been documented in quarterly reports and is in the process of being updated in ACRES (delayed by Dixie Fire). The last report for FY Quarter 4 was submitted on November 2nd, 2021. This report documented cleanup activities initiated in summer of 2021 and summarized budget expenditures to date.

SI’s open Cleanup Grants started July 1st, 2018, 2020, and 2021 and end October 31st, 2022, 2023, and 2024 respectively. Remaining funds will be used to continue remediation efforts on the sites identified in the Work Plans. Under these awards SI is currently undergoing additional site planning and investigations through the winter of 2021 to reinitiate capping of the contaminated sites in the 2022 field season.
FY2022 EPA Brownfield Cleanup Application

Threshold Criteria

1. **Applicant Eligibility:** Sierra Institute for Community and Environment is a 501(c)(3) non-profit organization. Documentation of tax-exempt status (Articles of Incorporation) is included in the narrative attachments.

2. **Previously Awarded Cleanup Grants:** Sierra Institute was awarded a Cleanup Grant in 2018, 2020, and 2021 to remediate different sites on the Crescent Mills property. The site proposed in this application is on the Crescent Mills property but has not received funding from the previously awarded grant.

3. **Expenditure of Existing Multipurpose Grant Funds:** N/A

4. **Site Ownership:** The site is owned by Sierra Institute and was purchased on October 25, 2017.

5. **Basic Site Information:**
   a. **Site Name:** Crescent Mills former LP Mill Site
   b. **Address:** 15690 Highway 89, Crescent Mills, CA 95934
   c. **Owner:** Sierra institute for Community and Environment

6. **Status and History of Contamination at the Site:**
   a. **Contaminant:** The site is primarily contaminated with hazardous substances, including arsenic. Total petroleum hydrocarbon (TPH) is on site but levels are not significant.
   b. **Operational Uses and Current Uses:** Plumas Lumber Company, a small-scale sawmill operated on the site until the late 1940s; whether or not a significant contamination occurred as a result of this operation is unknown. Louisiana Pacific (LP) company later operated a sawmill on the property until the mid 1980s. These sawmill practices resulted in release of arsenic, dioxins/furans, and TPH on site. The property remained vacant when the sawmill closed in the mid 1980s until Sierra Institute initiated remediation implementation in 2019. Remediated portions of the property are already being redeveloped and utilized for; 1) a chip storage and sorting operation used to process chips from local forest restoration activities for use in a biomass boiler used to supply heat and generate power at the Plumas County Human Health and Services building in Quincy, California; and 2) a community scale lumber mill that will expedite the recovery of communities impacted by the Dixie Fire by processing burned timber and creating a supply of low cost lumber that may be used for rebuilding efforts.
   c. **Environmental Concerns:** A Targeted Site Investigation (TSI) was completed in April 2017. The TSI identified that arsenic in soil appears to be the most widespread contaminant and is present on several areas on the property at variable levels that are just above background/screening levels (9.8 mg/kg). Groundwater tests indicate that the arsenic in the soil has not resulted in groundwater impacts at the site.
   d. **Contamination Source and Quantity:** According to assessments performed on site to date, the LP sawmill contributed to contaminated soils on site. Contamination primarily resulted from the common practice of spraying used oil and incinerator ash on mill roads for dust suppression.
purposes. Other activities that may have resulted in contamination include releasing of an anti-staining application to finished wood products containing pentachlorophenol (a chemical used in the past as a biocide to protect timber from fungal staining). A Targeted Site Investigation completed in 2017 for the site suggests that arsenic contamination is also from mine tailings that were used to initially develop the site. The predominant constituent of concern on the site, arsenic, has been documented throughout soils on the site at levels just above background/screening levels (9.8 mg/kg). Assessments have determined that contaminants on site are not impacting the groundwater.

7. **Brownfields Site Definition:**
   a. The site is not listed or proposed for listing on the National Priorities List.
   b. The site is not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA.
   c. The site is not subject to the jurisdiction, custody, or control of the U.S. government.

8. **Environmental Assessment Required for Cleanup Grant Applications:** Phase II and equivalent assessments completed to for the site include: 1) Phase II - November 2014; 2) Targeted Site Investigation - April 2017; 3) Follow up Site Characterization Report – February 2018; and 4) Removal Action Workplan – August 2019.

9. **Enforcement or Other Actions:** There are no known ongoing or anticipated environmental enforcement or other actions related to this site.

10. **Sites Requiring a Property- Specific Determination:** This site does not require a property-specific determination.

11. **Threshold Criteria Related to CERCLA/Petroleum Liability:**
   a. **Property Ownership Eligibility-Hazardous Substance Sites**
      i. **Landowner Protections from CERCLA Liability:**
         1. **Bona Fide Prospective Purchaser Liability Protection**
            In addition to the information provided in these sections, Sierra Institute certified that as the owner they are not liable in any way for contamination at the site or affiliated with any other person potentially liable for the contamination. Further, Sierra Institute will not impede performance of a response action or natural resource restoration.
            a. **Information on the Property Acquisition:**
               i. **Ownership Acquisition:** Property acquired through a negotiated agreement with a private individual; a lease-purchase agreement was in place for two years prior to Sierra Institute acquiring ownership.
               ii. **Date of Acquisition:** October 25, 2017.
               iii. **Nature of Ownership:** Sole Ownership.
            iv. **Transferor Information:** Purchased from Greg Lehman, Gary Lehman, and Jennifer Glanzmann
            v. **Relationships with Prior Owners:** No relationship with prior owner(s) other than lessor/lessee relationship.
   b. **Pre-Purchase Inquiry:**
      i. **Types of Assessments Performed:** The following assessments were completed prior to Sierra Institutes involvement with the site:
1. Preliminary Assessment/Site Inspection Report (California Environmental Protection Agency Department of Toxic Substances Control [DTSC], 1990)
2. Property Transfer Site Assessment (CH2M Hill, Inc. [CH2M Hill], 1991)

The following assessments were completed for Sierra Institute:
1. Phase I (Phase I (Ecology & Environment) – July 2014
2. Phase II (Targeted Brownfield Assessment Final Report by Ecology & Environment) – November 2014
3. Targeted Site Investigation (Geosyntec Consultants, oversight by California Department of Toxic Substance Control) – April 28, 2017
4. Phase I (Geosyntec Consultants, oversight by California Department of Toxic Substance Control [DTSC]) – April 28, 2017
5. Follow-up Site Characterization Report (Sierra Streams Institute) – February 2018
6. Removal Action Workplan (Sierra Streams Institute; reviewed and approved by EKI Environment & Water Inc.) – August 2019

ii. Assessment Entity and Qualifications: Phase I/II environmental site assessment was completed by Ecology and Environment in July 2014; this was contracted by the U.S. EPA. TSI and Phase I environmental assessments were completed by Geosyntec Consultants in April 2017; this was contracted by the CA DTSC.

iii. The property was purchased on October 25, 2017, within 180 days of the Phase I completion date (April 28, 2017) – Sierra Institute is a Bona Fide prospective purchaser.

c. Timing and/or Contribution Towards Hazardous Substances Disposal: All hazardous substances disposal occurred before Sierra Institute acquired the property. Sierra institute has not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.

d. Post-Acquisition Uses: The post-acquisition uses on the property consists of a small (~3-acre) area that has been remediated under a previous Cleanup Grant. This area is being used for wood chip storage and sorting operation and a community scale mill operation (in development). There are no other uses of the property including structural or other development to date.

e. Continuing Obligations: Sierra Institute certifies that they are exercising appropriate care by taking responsible steps to (i) stop continuing releases, (ii) prevent any threatened future release, and (iii) prevent or limit exposure to any previously released hazardous substances. Responsible steps include: limiting access to the property- property is enclosed with a fence and locked gate; monitoring known contaminants-Sierra Institute has carried out several site assessments and conducted air monitoring during cleanup activities under the previous cleanup grant; complying with state/local requirements; and following a finalized
Removal Action Workplan to carry out cleanup actions on other sited funded by the previous Cleanup grant.

Sierra Institute also confirms their commitment to (i) comply with any land use restrictions and not impede the effectiveness or integrity of any institutional controls; (ii) assist and cooperate with those performing the cleanup and provide access to the property; (iii) comply with all information requests and administrative subpoenas that have or may be issued in connection with the property; and (iv) provide all legally required notices.

12. Cleanup Authority and Oversight Structure
   a. Plumas County and Region 9 EPA are currently providing oversight for cleanup implementation on three sites within the Crescent Mills property and will continue to provide oversight for the new proposed site. Sierra Institute will continue to consult with EPA to ensure the cleanup is protective of human health and the environment. Sierra Institute staff (including a Board member specializing in Brownfields law) along with qualified consultants have successfully carried out cleanup implementation on the Property to date and have the background knowledge/technical expertise necessary to conduct, manage, and oversee cleanup actions for the proposed site.
   b. Accesses to a neighboring property may be utilized to source additional clean fill material for cleanup actions. Sierra Institute is in preliminary conversations with the California Department of Transportation (Caltrans) who may decide to remove clean fill on their adjacent wetland mitigation site in order to improve the quality of the site. If this option is pursued, Sierra Institute will coordinate with Caltrans to ensure all necessary planning and implementation requirements (soil sampling, permitting, etc.) are completed.

13. Community Notification
   a. Draft ABCA is attached.
   b. Community Notification Ads are attached.
   c. A public meeting was held on November 30, 2021 (announced November 16, 2021). Meeting details and notes are attached.

14. Statutory Cost Share
   a. Sierra Institute has successfully met cost share requirements under two previous cleanup grants utilizing on-site clean fill material owned by the Sierra institute; however this onsite resource is nearly exhausted and has been less than originally anticipated given the discovery of additional unknown remnants from the old mill operations which make the extraction of clean fill cost prohibitive. While Sierra Institute does not have other (Non-EPA) awards supporting site remediation, the organization has several other non-federal awards that are directed at redevelopment of the Crescent Mills site.
   b. Sierra Institute is requesting a hardship waiver for the 20% cost share (see attached).