

## FY.25 EPA Brownfield Cleanup Application Narrative – Mohawk Mine at Spring Creek Ranch

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

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

**1.a.i. Overview of Brownfield Challenges and Description of Target Area – Feather River Land Trust** (FRLT), a 24-year-old 501(c)(3) nonprofit organization whose mission is to conserve the lands and waters of the Feather River region and steward their ecological, cultural, and educational values for current and future generations, is applying for EPA Cleanup funds to address contamination from operations of the long-inactive Mohawk Mine at Spring Creek Ranch in mountainous eastern Plumas County, California. The Mohawk Mine on the property was originally developed for copper mining and was actively worked from 1905 to 1915. Many hard rock mines in the area stretching back to the mid-1800s have not been remediated, in large part due to lack of capacity of this low-population (and shrinking) rural county and its small local government to catalog and regulate these kinds of threats. The mine and its waste rock pile are directly adjacent to and uphill from the perennial Spring Creek, a tributary to Frenchman Lake, hence Little Last Chance Creek, the wild-and-scenic Middle Fork Feather River, becoming a key supply of drinking water to the California State Water Project. FRLT executed a purchase agreement for the 1640-acre ecologically rich property in March 2020 and subsequently secured a loan and purchased it in June 2021, to effect transfer of this important inholding to the Plumas National Forest (PNF) via the Land and Water Conservation Fund.

These are the ancestral homelands of the Washoe Tribe of Nevada and California since time immemorial, also used seasonally by the Mountain Maidu people. Spring Creek Ranch includes a four-mile stretch of Spring Creek, aspen- and willow-lined riparian areas, many acres of wet meadows, stunning rock outcroppings, shrubland and pine forest. The Property is used by multiple endangered wildlife species, including bald eagle and gray wolf, and supports a large population of the rare plant *Ivesia aperta* var. *aperta*. This region was colonized in the mid-1800s, and the area's economic base developed from resource extraction (mining, timber). In recent years, the economy has begun to pivot toward tourism and recreation. This area in Plumas County is very popular for recreation, including swimming and fishing in the streams, rivers and lakes; hunting (a lottery-based premium Rocky Mountain mule deer zone); hiking; wildlife viewing and more. The adjacent Frenchman Lake Recreation Area draws 34,000 overnight campers and 14,500 day users annually. Local populations and recreational visitors using the area and its waters have the potential for exposure to contaminants from Mohawk Mine. In addition, Spring Creek contributes its waters (and entrained contaminants) downstream into the California State Water Project, which provides drinking water for 27 million Californians and irrigation water to 750,000 acres of California farmland.

FRLT is applying for a Brownfields Cleanup Grant to clean up the Mohawk Mine (the Site) so Spring Creek Ranch (the Property) can be absorbed into the Plumas National Forest, safely used by the public, and no longer be a contamination threat to wildlife and downstream users. The Forest Service (USFS) has made it clear that it will not proceed with the planned purchase of the Property from FRLT until the Site has been remediated and that only Alternative 2 in the Analysis of Brownfields Cleanup Alternatives (ABCA) prepared for the Site will allow the USFS to move forward with the acquisition. As a small nonprofit in an under-resourced area, FRLT does not have the funds for the cleanup and has continued to accrue interest on the loan. While the Land and Water Conservation Funds were secured for the USFS conveyance in 2021, the transaction and reuse has been delayed due to the suspected contamination of the mine waste pile, which was confirmed through the Targeted Brownfield Assessment (TBA) Phase II. The population of Plumas County is < 20,000. The nearest community to the Site is ~five miles downstream, the Census Designated Place of Chilcoot-Vinton, with a population of 446. This disadvantaged low-income census tract (population 4,484) is nearly one-third seniors, and has rates of low life expectancy, asthma, heart disease, cancer, and low birth weight that are higher than state and national averages. Neither the town nor community has resources for the cleanup. The EPA Cleanup grant will allow FRLT to remediate the Site, thereby protecting vulnerable populations, to secure the needed “No Further

Action” letter from the State Water Board, and then proceed with the reuse strategy that will improve low- and no-cost recreation opportunities for this disadvantaged community.

**1.a.ii. Description of Proposed Brownfield Site** – The Brownfield Site occupies roughly five acres of the overall 1,640-acre Spring Creek Ranch (Property). The Mohawk Mine (Site, which is vacant mine-scarred land) operated between 1905 and 1915. Copper was the primary commodity, but minor amounts of gold, silver, lead, and molybdenite were also removed. The Property, which is surrounded by Plumas National Forest, was homesteaded between 1883 and 1892, and has been used for timber production, mining, and for cattle grazing, which ceased in 2018. USFS roads pass through the Property, providing forest access. In 2021, two weeks after FRLT closed escrow on the Property, the Beckwourth Complex wildland fire burned the Property. While there had been a few remnant historic structures on the Property before the fire, only a few rock foundations remain. Environmental assessments (Phase I, and Phase II through an EPA TBA) of the Mohawk Mine revealed the potential for Acid Mine Drainage (AMD) from mine waste and the contamination of soil, sediment, and surface water from metals. Soil samples contain elevated concentrations of antimony, arsenic, cadmium, cobalt, copper, iron, lead, manganese, molybdenum, selenium, silver, thallium, uranium, vanadium, and zinc that exceed at least one applicable screening level. As such, the material is classified as Group B mining waste (CA Title 27, Section 22480). Sediments have concentrations of arsenic, copper, and vanadium, and surface waters have concentrations of boron, iron, and mercury that exceed screening levels. The mine is located on a steep slope at the mouth of a drainage formed by springs that establish Spring Creek.

**1.b. Revitalization/1.b.i. Reuse Strategy and Alignment with Revitalization Plans** – Spring Creek Ranch was purchased by FRLT to effect a transfer from private to public ownership and inclusion into PNF adjacent to the Frenchman Lake Recreation Area. Site cleanup implementing ABCA Alternative 2 is a hurdle that must be cleared for the Forest Service to proceed with the conveyance, in large part because no Institutional Controls will be required following cleanup. Once the cleanup is completed, the acquisition by Plumas National Forest (PNF) can continue. Once the USFS takes possession, the Property will no longer be at risk for development, and the public will be able to enjoy its many resources. The intended re-use of Spring Creek Ranch, in the words of PNF:

*“Communities in eastern Plumas County depend directly on the lands of the Plumas National Forest to support their growing recreation and tourism economy. These industries are bringing new economic vitality to a part of California that is still transitioning from its historic reliance on timber extraction. Plumas National Forest can support the growth of the region's recreation and tourism economy by embracing the multiple uses and values of national forest lands and working to enhance the visitor experience at key destinations such as Frenchman Lake. Acquisition of the Spring Creek Ranch will do just that, providing access to 1,640 acres for world-class outdoor recreation experiences using new trails, dispersed campsites, and other future offerings. Recreation-based tourism generates jobs for area concessionaires, contractors, outfitters, guides, conservation groups, educational institutions, and outdoor recreation groups. Trails and facilities projects can make excellent use of job corps programs such as the California Conservation Corps, which invests in youth to develop job skills and land management ethics. Watershed restoration and forest health projects on Spring Creek Ranch can also enhance economic opportunities for area residents, encouraging social and economic diversity, community infrastructure and innovation, and new business and job opportunities in Plumas and Sierra counties. Collectively, investment in this project is a strategic investment in the socioecological resilience of economically vulnerable local communities.” (Plumas National Forest LWCF Application for Spring Creek acquisition, October 2020)*

FRLT worked collaboratively with PNF to seek input and build support for the reuse strategy from multiple public agencies and local grassroots organizations, including California Department of Fish & Wildlife (CDFW), Friends of Plumas Wilderness, Northern Sierra Partnership, Tahoe-Sierra Valley Chapter of California Native Plant Society, Plumas Audubon Society, City of Portola, and the Plumas County Board of Supervisors. These entities and local volunteer wildlife biologists, a hydrologist and soil scientist all provided input.

CDFW ranked Spring Creek Ranch as a priority acquisition as part of its Dixie Mountain Conceptual Area Protection Plan because of its size, status as an inholding within the PNF, potential to expand and enhance wildlife-oriented recreation, and due to its abundance of water, wildlife, and recreational

resources. In her letter representing the people of Plumas County, Supervisor Simpson points out the alignment of the project with the Plumas County General Plan, including: by the preservation of open space, recreation, forestry and working lands; by discouraging conversion and encroachment by non-compatible uses on these types of lands within the county; by helping to enhance Plumas County's appeal as a recreation destination; and by supporting plans and policies in national forest lands that help create new economic activity that benefits the local economy.

According to PNF, the project will promote more consistent, cohesive management by consolidating ownership around isolated parcels within National Forest System lands. Incorporation of Spring Creek Ranch into the PNF will reduce boundary management costs, clarify road management, increase opportunities for the Forest Service to improve watersheds and treat hazardous fuels at the landscape scale, and, importantly, by preventing development of housing or other intensive uses on the Property, prevent new wildland-urban interface around Frenchman Lake and potentially decrease future firefighting costs associated with commercial or residential structure protection. It is not in a floodplain.

**1.b.ii. Outcomes and Benefits of Reuse Strategy** – The Site cleanup and planned reuse support many aspects of climate adaptation/mitigation capacity and resilience. While the Site is not in a federally designated flood plain, climate change is exposing the area to more frequent and severe wildfires, as well as extreme weather events, such as intense rainfall and rain-on-snow events, conditions that pose some the highest risks for AMD and metal contaminants reaching the creek. In addition, uncontrolled off-highway vehicle use is increasing in the area with direct disturbance to waste rock piles. Removal of the source of contaminants will mitigate these risks. The reuse as public land will allow the Property to continue providing climate resilience benefits, while conserving the wildlife and wild spaces valued by involved community groups. The elevation of the Property (5,700' – 7,000') provides climate refugia for many wildlife species, including cold spawning flows for the local trout fishery. At the heart of the Property is Spring Creek, surrounded by wet meadows and riparian areas. In spring, these meadows act like a sponge, storing snowmelt and slowly releasing it throughout the dry summer. This adds to the long-term storage value of the downstream reservoir, Frenchman Lake, which supplies vital irrigation and livestock water to local ranches, and through the State Water Project, contributes to the state's ability to manage its water supply during extremes such as flooding and drought, while contributing to a major source of hydroelectric power deliveries for the State's power grid. Once the mine is reclaimed, conservation of the Property will ensure these benefits are not lost to development. The reuse strategy will add 1,640 acres to the forest with approximately 115 acres of wet meadows, 4.6 miles of perennial stream, approximately one acre of a rare plant, forest, shrubland, many subsistence food sources (pine nuts, camas lilies, yampah, game), wildlife habitat, and stellar views. The intended reuse will expand recreation opportunities, including stream fishing and dispersed camping in a prime setting, free of the fees that can foster inequity in recreational access.

*"Surrounding communities are in a Disadvantaged Community census tract and rely heavily on outdoor recreation to provide jobs and economic growth. This project would add many acres of diverse terrain to support hiking, hunting, fishing, birdwatching and wildlife viewing, botanical explorations, camping, rock climbing, mountain biking, snow shoeing, and cross-country skiing, to name a few. Local gateway communities can reap economic benefits when visitors seek lodging and restaurants, buy fuel, groceries, outdoor gear, and specialized equipment, or explore local 'Main Street' shops."* (Plumas National Forest, 2020 LWCF application)

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

**1.c.i. Resources Needed for Site Characterization** – The Site characterization is sufficient for remediation to continue.

**1.c.ii. Resources Needed for Site Remediation** – The EPA grant is sufficient to complete remediation. No additional funding resources are required for the cleanup.

**1.c.iii. Resources Needed for Site Reuse** – Through a joint FRLT-USFS effort, \$2 million in 2021 Land and Water Conservation Funds has been secured toward Site/Property reuse, the USFS acquisition of the Property, which will allow it to become an important recreation area for the public for fishing, dispersed camping, hiking, hunting, etc. The attached Conference Report documents the ranking of Spring Creek for USFS LWCF funds (8 in the nation) and the funding amount secured. A second key

secured resource is \$700,000 for meadow restoration from Point Blue Conservation Science with funding from the California Wildlife Conservation Board (see attached letter). By addressing erosion and head-cutting in the meadow, the meadow restoration project will slow the stream and reconnect the flood plain, reducing sediment transport, and, importantly, increasing the filtration and carbon storage capacity of the meadow. These benefits will enhance Site re-use by improving the health of the meadow and stream for wildlife use, recreation, and water quality, along with the capacity to support important indigenous food source plants, such as camas lily and yampah, which rely on wet meadows.

**1.c.i.v. Use of Existing Infrastructure** – Existing County and USFS roads to and through the property are the infrastructure needed for reuse. No other infrastructure is needed.

## **2. Community Need and Engagement**

**2.a.i. Community's Need for Funding** – Plumas County is a rural northeastern California county with 1.6 million acres and 19,131 people, an 8% population decline since 2000, according to the Census Bureau. Thirty percent of the population is age 65 or older. The Chilcote-Vinton Census Designated Place, the closest community to the project Site, had a 2020 population of 446. According to the CA Department of Water Resources Disadvantaged Community Mapping Tool, in 2020, the Census Tract (06063000300, population 4,409) in which the Property and Site reside is a low-income Disadvantaged Community (2016-2020 American Community Survey). With a per capita income of \$47,386, the population ranks just above Severely Disadvantaged, a designation that starts at a median income below \$47,203. The Cleanup grant will help prevent exposure of this disadvantaged community and others downstream to contaminants from mine waste. Feather River Land Trust owns the Property. As a small non-profit, serving a rural low-population, low-wealth region, the organization does not have the resources to pay for the cleanup. Meanwhile, years are passing with interest accruing on FRLT's loan and monitoring and management costs continuing – all pulling from FRLT's private/member fundraising.

**2.a.ii.(1) Threats to Health or Welfare of Sensitive Populations** - The target area has a disproportionate percentage of seniors – 28% vs. CA at 16% and US at 18% (EJScreen). Generally having lower immunity, the elderly are particularly vulnerable to all exposure pathways to mine wastes. CalEnviroScreen 4.0 indicates that 30% of people in this census tract live below twice the federal poverty level, higher than 54% of the census tracts in California. Many in this Food Desert (EJScreen) augment food resources through fishing and hunting, which increases ingestion exposure through consumption of contaminated food sources, and recreate in close contact with the environment (e.g., swimming, boating, hiking, off-roading). Contact with sediment-contaminated stream and lake water increases dermal and ingestion exposure. Off-roading, vegetative denuding from wildfire and prescribed burning, and firewood collection cause fugitive dusts that increase inhalation hazard. These activities also increase stream loads of contaminants. Regularly exposed to wood smoke (ozone, particulates) from heating, wildfires and prescribed burning, inhalation exposure worsens lung hazards for this vulnerable population. CalEnviroScreen 4.0 lists the drinking water contaminant score, an index of average contaminant concentrations and violations, for this census tract as 581, higher than 68 percent of the census tracts in the state. Sediment loads from the Site are transported to Frenchman Reservoir, which provides drinking and irrigation water to those in the region and throughout the state. The drinking water contaminants of arsenic, cadmium, hexavalent chromium (valence not indicated in the Phase II), lead and copper, which are contaminants detected at the proposed remediation site, are listed at the 91.4, 0.0, 65.5, and 81.9 percentiles for the region. Inputs of mercury, a US EPA National Primary Drinking Water contaminant, to the surface water at the Site contribute to the contaminant load of drinking water for this census tract; mercury causes kidney damage (US EPA, 2006). Environmental factors exacerbating Incidence of Disease and Adverse Health Conditions for the region include: Ozone levels, which at 76.3%, exceed both state (74.2%) and national (61.8%) averages; Wildfire Risk at 44% (CA: 30%; US: 14%); and Extreme Heat (temperatures exceeding 90°F), which ranged between 81 and 100 days for the years 2019 through 2023. This grant will help improve drinking water quality and air quality by allowing FRLT to remove the contaminant source in its entirety. Without the grant, the population and its wildlife are subject to continued exposure that will go unabated.

**2.a.ii.(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions** - The EJScreen tool identifies the target area (Blockgroup 060630003004) as subject to higher-than-average health burdens, with four out of the five Health Indicators exceeding state and national averages: Low Life Expectancy is 21% (CA: 18%; US: 20%); Heart Disease is 6.4% (CA: 4.8%; US: 5.8%); Cancer at 7.8% (CA: 5.6%; US: 4.8%); and Persons with Disabilities at 16.9% (CA: 11.3%; US: 13.7%). CalEnviroScreen 4.0 indicates that this census tract's Asthma rate is higher than 88%, groundwater threats are higher than 67%, and birth weights are lower than 75% *of all other census tracts in the state*. According to the US Centers for Disease Control and Prevention, the pre-Covid (<2019) Premature Death Rates for Plumas County increased from 563 per 100,000 deaths to 725 per 100,000 deaths for the period 1999 through 2018. Critical Service Gaps exacerbating health conditions include limited access to Broadband Internet and Transportation Access (EJScreen). This grant will help FRLT to eliminate conditions found at the Site that pose health risks and contribute to greater than normal incidence of disease (e.g., fugitive dusts that inflame asthma leading to greater risk for hospitalization).

**2.a.ii.(3) Environmental Justice** - (a) The Gold Rush arrived in Plumas County in 1850, prior to California's statehood, environmental regulations and enforcement. A legacy of unremediated hard rock mines remain, contributing contamination to other Environmental Justice inequities residents experience associated with loss of extractive industries in a low-income, low-population rural area without a source of jobs, public transportation, food access or medical or assistive services. The tract is not identified as disadvantaged by CEJST. (b) The Cleanup project promotes three Environmental Justice benefits by removing a potential source of contamination, by involving community members in project input, and by increasing low-cost outdoor recreation opportunities, including adding dispersed camping opportunities (free) as alternatives to the fee campgrounds at Frenchman Lake. The cleanup will also offer protections for locals and visitors who recreate, hunt and fish on or downstream of Spring Creek Ranch by reducing exposure to contaminants on the ground and in the water. The unknown assimilative capacity of the creek, reservoir, river and State Water Project recommend removal of all headwaters sources of contamination to reduce exposure for the 27 million drinking water users in communities all the way to Los Angeles, many of whom face environmental justice inequities, as well as contamination of agricultural products consumed locally and around the world. By conserving and preventing development of the Property, it will also continue to function as a water storage area, carbon sink and filter, regulating quantity and quality of water passing downstream, reducing flooding potential, and building drought resilience.

**b. (i.& ii.) Community Engagement – Involvement & Roles** – FRLT will continue collaborating with the many individuals and entities involved in this project over the last five years.

- **FRLT Land Protection Committee** – Includes community volunteers who oversee FRLT land protection projects, including scientific evaluation, transaction due diligence, conformance to policy, and making recommendations to the board of directors. Volunteer community members providing ecological and strategic input and oversight include Ken Roby (Chair, Aquatic Ecologist), Paul Hardy and Ryan Burnett (Wildlife biologists), and Teri Simon Jackson (retired USFS). Contact via FRLT, [info@frlt.org](mailto:info@frlt.org).
- **FRLT Stewardship Committee** – Includes community volunteers who help guide management of FRLT-owned properties who will provide organizational oversight for the cleanup and meadow restoration projects. Volunteer members include Ken Roby, Denny Churchill (Soil Scientist), Alan Morrison (Chair, retired educator), Tamia Marg Anderson (rancher), and Trina Cunningham (Mountain Maidu tribe). Contact via FRLT.
- **Point Blue Conservation Service** – Mission: *working to reduce the impacts of climate change, habitat loss, and other environmental threats while developing nature-based solutions to benefit wildlife and people*. Through a California Wildlife Conservation Board block grant, Point Blue is planning a meadow restoration project in areas of head-cutting and erosion along Spring Creek downstream of the mine. Plans include opportunities for local school children to participate through Point Blue's Students and Teachers Restoring A Watershed program (STRAW) to help build beaver dam analogs, revegetate and possibly monitor areas, while learning about water quality and watershed function. In addition, graduate students may study water quality at the Site. Contact: Ryan Burnett, [rburnett@pointblue.org](mailto:rburnett@pointblue.org).

- **US Forest Service**—Motto: *Caring for the Land and Serving People*. USFS Region 5 and PNF staff will continue their involvement in all planning at the Site, and once they take possession, will manage the recreational reuse of the Property. Contact: [Erika Brenzovich, erika.brenzovich@usda.gov](mailto:Erika.Brenzovich@usda.gov)
- **Community Organizations and Agencies** – FRLT and USFS will continue working with local and regional entities to share information about the project and seek input and support, including Northern Sierra Partnership, whose mission is *conserving and restoring the Northern Sierra* (Lucy Blake, President, [lblake@northernsierrapartnership.org](mailto:lblake@northernsierrapartnership.org)), California Department of Fish & Wildlife—*managing California’s wildlife, plants and habitats* (Josh Bush, Lands Acquisition Coordinator, [joshua.bush@wildlife.ca.gov](mailto:joshua.bush@wildlife.ca.gov)), Friends of Plumas Wilderness—*protecting & maintaining wild places* (Darrel Jury, [darrel@plumaswilderness.org](mailto:darrel@plumaswilderness.org)), Tahoe-Sierra Valley Chapter of the California Native Plant Society—*increasing understanding, appreciation and conservation of native plants* (Brett Hall, [brett@ucsc.edu](mailto:brett@ucsc.edu)), Plumas Audubon Society—*promoting the understanding, appreciation, and protection of the Feather River Region’s biodiversity, especially birds* (Ellie Hinrichs, [ellie@plumasaudubon.org](mailto:ellie@plumasaudubon.org)), City of Portola (City Council, Bill Powers, [bpowers96122@gmail.com](mailto:bpowers96122@gmail.com)), and Plumas County Supervisors’ office ([pcbs@countyofplumas.com](mailto:pcbs@countyofplumas.com)).
- **Sky View Foundation** – Lender

**2.b.iii. – Incorporating Community Input** – Through a combination of online and in-person meetings, FRLT’s project Advisory Team, as described in Task 2 below, will meet at least quarterly for updates and input, including Site visits as-needed. FRLT’s committees will have monthly opportunities for input. USFS and Point Blue coordination calls will likely occur monthly during periods of activity (possibly less often in winter). FRLT will invite the locals for a Site tour and will provide periodic updates to the larger community through our ~2400-person email list, our website, and the local online media outlet. If an “interested parties” list of individuals develops, we will send targeted communications to this group. All input will be responded to and will be incorporated when feasible.

**3. Tasks, Costs and Measurement**

**a. Proposed Cleanup Plan** – In 2024, Tetra Tech, Inc. and Toeroek Associates, Inc. (the Toeroek Team) completed a Phase II ESA of the Site and prepared an ABCA report under an EPA Targeted Brownfields Assessment. The Toeroek Team conducted soil, sediment, and surface water sampling. Concentrations of metals in soil, sediment, and surface water samples exceeded both screening levels (SLs) and background levels. Mine waste piles pose the potential for AMD and are classified as Group B mining waste. The proposed cleanup plan will follow ABCA Alternative 2 to include a Human Health and Ecological Risk Assessment (HHERA), mining waste and sediment excavation, and off-site disposal. Cleanup will include excavation of suspect material, temporary stockpiling of waste, confirmation sampling, and off-site disposal of an estimated 1000 cubic yards of material scattered over the 5-acre Site. Analysis of the material will determine final disposal at either a Class I, II, or III facility. There is currently no indication for groundwater cleanup. Alternative 2 will allow unrestricted use of the Property eliminating the need for Institutional Controls. Any new haul roads, staging areas, and temporary stream crossings will be restored to a natural state, and appropriate site and erosion control measures will be installed. FRLT will monitor the Site regularly during construction.

**b. Description of Tasks/Activities and Outputs:**

**i. Implementation** - Non-EPA grant resources, participant support costs, subawards: N/A

EPA-funded tasks/activities	
<b>Task 1 – Grant Management</b>	<b>Task Lead:</b> FRLT
Perform kick-off meeting with EPA Grant Manager to coordinate Grant Requirements. Enter into grant agreement with EPA. Establish internal project tracking and accounting. Prepare and administer Request for Proposals for Qualified Environmental Professional (QEP) to prepare a Site Cleanup Plan (including HHERA), meeting the cleanup objectives of FRLT, USFS, and Regulators. Execute contract with a QEP. Prepare project schedule and milestones. Prepare quarterly status reports to ensure the project stays on track and goals are completed in the project timeframe. Conduct quarterly check-in meetings with QEP, EPA, Water Board, USFS, CDFW and Plumas County. Perform necessary project accounting and record keeping. Attend Brownfield Cleanup conferences.	
<b>Schedule:</b> Quarterly meetings, reporting; May 2025 (notification of Award) – Sept. 30, 2026 (reporting post-	

construction). Kick-off meeting, May 2025; QEP hired by July, 2025; Schedule and Milestones established, August 2025	
<b>Outputs:</b> 1 RFP, 6 quarterly/ACRES reports, 6 quarterly reimbursement invoices, travel to conferences	
<b>Task 2 - Preconstruction Activities</b>	<b>Task Lead:</b> FRLT
Form project Advisory Team with representatives from Plumas County, California Water Board, U.S. Forest Service (USFS), Washoe Tribe of Nevada and California, Maidu Summit Consortium (or other interested Mountain Maidu entity), and members of the FRLT Stewardship Committee (local expertise with specific knowledge of the area). Conduct cultural and biological assessments; determine impact mitigation measures for cultural and ecological features with Washoe and Maidu cultural resource monitors. Conduct a detailed risk assessment to evaluate risks to human and ecological receptors.	
<b>Schedule:</b> May 2025 (following notification of Award) through August 1, 2025	
<b>Outputs:</b> 1 Project Summary for public distribution, 1 HHERA, 1 Cultural Resource Assessment/Department of Recreation Archaeological Site Record, 1 Biological Assessment	
<b>Task 3 - Site Cleanup Planning</b>	<b>Task Lead:</b> FRLT with Professional Consultant (PE/Geologist)
Provide notification (email, FRLT website, notice in online media outlets) and conduct community Site tour to <u>engage the community and keep the public informed</u> of planned cleanup activities with website updates and e-blasts. Prepare the Site Cleanup Plan, including Site walks and soliciting input from the Advisory Team and the public, addressing comments and concerns, preparing draft and final Plans. Prepare Quality Assurance Project Plan (QAPP), Health and Safety Plan (HASP) and Stormwater Pollution Prevention Plan (SWPPP). Solicit proposals and hire qualified construction contractor following EPA Grant requirements and FRLT Policies and Procedures.	
<b>Schedule:</b> August 1 through September 30, 2025; community outreach, as needed, at least quarterly	
<b>Outputs:</b> 1 Site Cleanup Plan, 1 contract, 1 SWPPP, 1 Community meeting/tour, 3 notes of meetings with public and agencies, 1 QAPP, 1 HASP.	
<b>Task 4: Cleanup, Remediation and Monitoring</b>	<b>Task Lead:</b> FRLT with QEP and Qualified Construction Contractor
Secure permits from appropriate regulatory agencies (CDFW, Water Board, Plumas County, US Forest Service). Construct or improve haul roads, stream crossings and staging areas, as-needed. Excavate ~1,000 cubic yards of mining waste and sediments with contaminant concentrations above assumed cleanup levels, per the Phase II ESA and ABCA Alternative 2. Engage Washoe and Maidu cultural resource monitors to be on-site during excavation. Following excavation, conduct five-point composite confirmation soil and sediment sampling of the walls and floor of each excavation area to ensure contaminant concentrations in remaining soils are below assumed cleanup levels. Stockpile excavated mining waste and sediment on the Site; conduct waste profile characterization; haul excavated mining waste and sediment to an off-site permitted disposal facility. Depending on hazardous and leaching characteristics, waste disposal may occur at an appropriate non-hazardous or hazardous waste permitted facility. Backfill excavated areas with clean fill material, and grade and seed as appropriate. Decommission and recontour all non-USFS system haul roads and staging/stockpile sites. Revegetate if necessary. Install necessary erosion control measures appropriate to the Site including onsite mulching with chipped woody material, temporary fencing/log barriers and signage.	
<b>Schedule:</b> Spring 2026 (when site conditions allow) through September 30, 2026	
<b>Outputs:</b> Four Regulatory agency permits, 1 Post-cleanup report by QEP, 1 Soil Sample results report, 2 waste handling manifests, 1 chain of custody and waste acceptance document, 1 No Further Action Letter from the State Water Board.	

### c. Cost Estimates

Budget Categories		Project Tasks (\$)				Total
		Task 1 Grant Mgmt	Task 2 Pre- Construction	Task 3 Site Cleanup Planning	Task 4 Cleanup, Remediation & Monitoring	
Direct Costs	Personnel	\$17,320	\$424	\$14,592	\$7,640	\$39,976
	Fringe Benefits	\$6,062	\$148	\$5,107	\$2,674	\$13,991
	Travel	\$7,920		\$1,920	\$1,620	\$11,460
	Equipment					\$0
	Supplies	\$300	\$120		\$2,500	\$2,920
	Contractual	\$5,000	\$106,000	\$31,000		\$142,000
	Construction				\$1,228,000	\$1,228,000
	Other - Permit Fees				\$37,600	\$37,600
Total Direct Costs		\$36,602	\$106,692	\$52,619	\$1,280,034	\$1,475,947
Indirect Costs		\$1,830	\$5,335	\$2,631	\$64,002	\$73,798
Total Budget		\$38,432	\$112,027	\$55,250	\$1,344,036	\$1,549,745

Personnel Key: CD: Conservation Director, LPM: Land Protection Manager, OM: Office Manager, ED: Executive Director, CS: Communications Specialist, PM: Project Manager. Staff fringe is 35%.

#### Task 1: Grant Management - \$38,432

Personnel Costs: 7 project team meetings (7 meetings x 2 staff x 7 meetings [CD, LPM]); 6 Quarterly Reports (CD, LPM); 1 Final Summary Report (CD, LPM); project accounting (OM), 2 regional brownfields conferences (LPM), 1 national brownfields conference (CD, ED). Fringe

Travel Costs: 2 remote staff attend face-to-face meetings at FRLT HQ (mileage); 1 staff to attend 2 regional conferences (2 conferences, mileage, hotel, per diem); 2 staff to attend 1 national conference (mileage, airport parking, flights, hotel, per diem). Supplies. CPA Services.

#### Task 2: Preconstruction Activities - \$112,027

Personnel Costs: 1 Advisory Team meeting, including preparation (food and beverage, staff time (CD, LPM). Fringe. Contractor Costs (Estimates based on the ABCA or recent contracting for similar work): Tribal engagement stipend; Cultural Assessment; Biological Assessment, Human Health and Ecological Risk Assessment. Supplies.

#### Task 3: Site Cleanup Planning and Permitting – \$55,250

Personnel Costs: Community Site Tour and Meetings (CD, LPM, CS); Development of Bid Documents (RFP) for cultural and biological assessments and cleanup plan, evaluation of bids, calling references, coordination of pre-bid onsite meetings and selection of contractors (CD, LPM). Fringe. Travel Costs: mileage, lodging.

Contractual Costs: 1 QAPP; 1 HASP; 1 SWPPP.

#### Task 4: Site Cleanup, Remediation and Monitoring – \$1,344,036

Personnel Costs: Project coordination (CD, LPM), Monitoring of construction (CD, LPM) Fringe.

Travel Costs: (mileage, lodging)

Contractual Costs: Cleanup of 1,000 cubic yards of contaminated rock and sediment (including Site Cleanup Plan, permitting, confirmation sampling, haul road improvement and Site restoration). See attached ABCA for cleanup cost estimates. Supplies. Permit Fees and Oversight Cost Reimbursement.

**Indirect Cost Note:** FRLT defines indirect costs as related costs that are difficult to track on a project basis. These costs include office utilities, insurance, office space rental, and incidental office supplies (ink, paper, staples, etc.). These costs do not include staff time for project-specific tasks. These costs are included above.

**d. Environmental Progress Measurement Plan** – FRLT will develop a workplan with detailed schedule of key project milestones, such as HHERA and QAPP completion, outreach events scheduled and conducted, and remediation work, and will track these in an Excel spreadsheet. At least monthly, FRLT will track and evaluate progress in achieving outputs and milestones against the work plan schedule, in addition to communicating with the QEP and cleanup contractor. FRLT will increase monitoring and communication



during the active cleanup phase and act promptly to address any unanticipated changes during this critical period. FRLT will monitor the project budget concurrently with tracking the schedule, and work to address inconsistencies on at least a monthly basis. FRLT will document project outputs, outcomes, and results in quarterly progress reports to EPA and in EPA's ACRES database. FRLT will track these anticipated outcomes (described in Section 3b) from cleanup and development: volume of waste excavated and removed, miles of haul road treated and/or removed, area (square feet) revegetated, number of Off-Highway-Vehicle barriers installed, number of outreach events conducted (community tours and land trust workshops).

#### **4. Programmatic Capability and Past Performance**

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

**i. Organizational Structure** - Founded in 2000, Feather River Land Trust (FRLT) is a Land Trust Alliance-accredited regional land trust nonprofit employing 13 full-time staff, a contract CPA, and seasonal field crews from spring to fall. FRLT has a core operating budget of ~\$2,000,000/year, with approximately 40% of funding secured through private philanthropy, 20% through restricted endowment funds and 40% through state and federal grants. FRLT has successfully conserved over 100,000 acres with partners, holds conservation easements on 29 properties (64,600+ acres), and owns 3,637 acres across five preserves, plus Spring Creek Ranch. Oversight is provided by a 7-member board of directors with extensive business, science and educational backgrounds. FRLT's volunteer Land Protection and Stewardship Committee members contribute community contacts and expertise (e.g., biology and ranch management) and will provide more direct project input and oversight. FRLT has experience managing millions of dollars in federal, state, and foundation grants for land conservation and stewardship, education and recreation projects, and is nearing completion of a \$12M facilities project at our Sierra Valley Preserve, funded by California Natural Resources Agency and Sierra Nevada Conservancy grants and private funding.

**ii. Description of Key Staff** - The core FRLT team responsible for managing the EPA grant: Executive Director Corey Pargue will provide organizational and grant oversight of program staff and finance, utilizing her 15 years of non-profit operational and development experience. Conservation Director Shelton Douthit, former FRLT ED, will leverage three decades of land protection transaction, due diligence, and stewardship experience as the project director, hiring and managing consultants and contractors, and overseeing all aspects of grant execution. Land Protection Manager Kristi Jamason, with 20 years and many millions of dollars of grant management experience and seven years in land protection transactions, will assist with project management and provide on-the-ground project and administrative coordination. Mr. Douthit and Ms. Jamason have been working on the Spring Creek Ranch land protection project for the last five years. Records, invoicing and financial management will be provided by Alex Davi, CPA, and FRLT's Operations Manager, Keegin Lee, who has multiple years in office management and bookkeeping.

**iii. Acquiring Additional Resources** - FRLT will leverage professional services contracts for consultants and construction contractors with the skills, expertise and equipment to complete the cleanup project. Due to the complexity of the Site Plan and engineering required for excavation and site stabilization, a QEP (Professional Engineer or Registered Geologist) will be contracted. A licensed construction contractor with appropriate experience with hazardous waste removal and grading is required. Contractor(s) will have appropriate insurance and provide an assure bond. Soil sampling and compliance monitoring will be performed by the QEP. As an accredited land trust, FRLT has policies and procedures consistent with Land Trust Standards and Practices and reviewed by the Land Trust Accreditation Commission. The standards cover ethics, legal compliance, board accountability, financial oversight, ensuring sound transactions, and more. FRLT has the internal procedures and experience necessary to retain a Qualified Environmental Professional and cleanup contractor per the requirements of 2 CFR Part 200.

##### **b. Past Performance: Purpose & Accomplishments**

FRLT has not received an EPA Brownfields Grant but has received other federal and non-federal grants. Examples include:

- **Natural Resources Conservation Service Regional Conservation Partnership Program** (completed)  
From 2016 to 2021, FRLT was the lead partner, managing a contract with the Natural Resources Conservation Service (NRCS, a division of USDA with a mission *to deliver conservation solutions so*

*agricultural producers can protect natural resources and feed a growing world*), The Nature Conservancy and Northern Sierra Partnership. This project mobilized more than \$17 million in state and private funding to leverage \$8 million in NRCS funds to conserve high-quality wildlife habitat and enhance water quality and quantity in the ecologically important Sierra Valley, CA. The project resulted in the conservation of 5,620 acres using NRCS grant funding, another 5,400 acres conserved without use of NRCS funds, and additional projects still in-progress. Through community outreach, the project raised landowner awareness of conservation easements as a tool for achieving conservation and financial goals. The program was successfully completed under multiple cooperative agreements and program contracts.

- **Economic Development Administration (EDA) Grant** (in-progress)

In 2022, FRLT was awarded \$347,274 from the EDA from the FY 2021 American Rescue Plan Act Travel, Tourism, and Outdoor Recreation program. The project is in the planning and design phase. The purpose of the project is to create a first-class, year-round tourism destination at FRLT’s Olsen Barn Meadow Preserve that will have positive long-term economic benefits for the community of Chester, and Plumas County. The following upgrades will draw more visitors: plan and design visitor amenities; develop interpretive information; improve accessibility for people with physical disabilities, including an ADA-compliant parking area, restroom facility and paved pathway; improve the walking route to the barn; restore barn elements; install three benches, and beautiful illustrated interpretive signage.

- **EPA Healthy Watersheds Consortium Program Grant** (completed)

In 2017, FRLT was awarded \$200,000 under the Healthy Watersheds Consortium Grant Program through the US Endowment for Forestry and Communities, which *works collaboratively with partners in the public and private sectors to advance systemic, transformative and sustainable change for the health and vitality of the nation’s working forests and forest-reliant communities*. Successfully completed in 2021, the overall goal of this project was to build FRLT's capacity to protect and steward additional priority areas in the Feather River Watershed. The intended outcomes and progress toward them are as follows:

Increase private funding to grow staffing and sustain capacity	Raised \$7,065,470 in private funding to increase staffing and sustain capacity toward conservation and restoration goals
Secure remaining capital funds from public and private sources to conserve 75,000 acres.	Secured public and private funds and completed 22 land conservation transactions totaling 22,490 acres during the grant period. Several transactions were delayed, but have since been completed, and FRLT has now conserved over 100,000 acres.
Ensure continued community support for surge in land conservation and ecological land management.	Built community support for land conservation and ecological land management through: public access improvements at our preserves, educational events, media coverage, and digital communications, including a new website and e-newsletter to 2,600 subscribers

Compliance with Grant Requirements - FRLT has consistently completed all required reports, which were submitted on time. FRLT was compliant with all terms and conditions of each grant. All outputs and outcomes were reported to the grantor and current open grants are on track for successful completion by the current grant project end dates.