

Community Relations Plan
Sequoia and Kings Canyon National Parks
Lower Kaweah Burn Dump Site
Tulare County, CA



Prepared For:

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ACRONYMS AND ABBREVIATIONS

CCHL	California Human Health Screening Level
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CRP	<i>Community Relations Plan</i>
EE/CA	Engineering Evaluation and Cost Analysis
GMP	General Management Plan
HRS	Hazard Ranking Score
mg/kg	milligrams per kilogram
MOU	Memorandum of Understanding
NCP	National Oil and Hazardous Substances Pollution Contingency Plan
NPS	National Park Service
NTCRA	Non-Time-Critical Removal Action
PA	Preliminary Assessment
RSL	regional screening level
SEKI	Sequoia and Kings Canyon National Parks
Site	Lower Kaweah Burn Dump Site
TTLc	total threshold limit concentration
USEPA	U.S. Environmental Protection Agency
USFS	U.S. Forest Service

1 INTRODUCTION

On behalf of the U.S. Department of the Interior, National Park Service (NPS), Environmental Cost Management, Inc. (ECM) prepared this Community Relations Plan (CRP) for response activities at the Sequoia and Kings Canyon National Parks (SEKI) in Tulare County, California. The project will address waste material within a burn dump site located in the Lower Kaweah area within the Giant Forest of Sequoia and Kings Canyon National Parks (**Figure 1 and Figure 2**). NPS is the lead regulatory agency and derives their regulatory oversight authority to respond to the release or threatened release of hazardous substances at or from the site from the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). As a federal agency, NPS must follow the CERCLA process known as the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) to support an Engineering Evaluation/Cost Analysis (EE/CA) for the site. Section 300.415(m) of the NCP identifies community relations as a necessity for all removal actions.

This CRP is consistent with the NCP and U.S. Environmental Protection Agency (USEPA) Superfund Community Involvement Handbook (April 2002, EPA 540-K-01-003). As the site progresses toward closure, and as community relations needs become more apparent, NPS may elect to update this CRP.

1.1 PURPOSE AND OBJECTIVES

The purpose of this CRP is to provide a guide for NPS to solicit comments from the public, address concerns, and disseminate information to community members, government officials, the media and other interested parties regarding the environmental assessment and cleanup activities at the burn dump site

To this end the CRP proposes to:

- Involve the public in the implementation and development of the described Project;
- Assess and document community concerns;
- Establish procedures for accurate and timely release of information to potentially affected and interested citizens, elected officials, public interest groups, and representatives of regulatory agencies;
- Inform the public about the objectives of the investigation and evaluation of cleanup alternatives, and
- Update the public about the cleanup process and goals for the Project.

The CRP will be updated as necessary to reflect any significant changes in public interest or involvement as the investigation and cleanup processes moves forward.

1.2 CERCLA

Congress enacted CERCLA, also known as the “Superfund” law, in 1980 to address releases of hazardous substances into the environment. Since then, significant efforts across the country have located, investigated and cleaned up contaminated sites.

CERCLA gives the President broad powers to respond to hazardous substance releases. The President has delegated his authority to a number of federal departments and agencies including the Department of Interior. NPS, as CERCLA lead agency for the burn dump site, is undertaking a non-time critical removal action or remedy. An EE/CA is underway to determine the nature and extent of contamination, evaluate the risks to human health and the environment,

evaluate possible responses to the problems identified and present a preferred response action alternative.



1.3 OVERVIEW OF THE COMMUNITY RELATIONS PLAN

The Community Relations Plan is a guide for including the public in the decision making process for selecting a remedy for the site. The CRP is organized as follows:

- Introduction – A description of the purpose of the CRP.
- Project Background – An overview of the site history, site description, and past environmental investigations as well as planned environmental work.
- Community Background – A community profile and description of the community involvement to date.
- Community Relations Activities – A listing of the federal communication requirements, communication methods, an administrative record file/information repository details, and a schedule of community involvement activities.

2 PROJECT BACKGROUND

This section describes the SEKI and the Lower Kaweah burn dump site surrounding area and historical uses. It also describes past and future activities for the Site.

2.1 SITE DESCRIPTION

Located in the southern Sierra Nevada Range, SEKI contains big trees, high peaks, and deep canyons. The parks' elevations extend from 1,370 feet (417.58 meters [m]) in the foothills to 14,494 feet (4,417.8 m) at the summit of Mount Whitney, the highest point in the contiguous 48 states. These extreme topographic differences and a striking elevation gradient create a rich tapestry of environments, from the hot, dry lowlands along the western boundary to the stark and snow-covered alpine high country. Topographic diversity supports over 1,200 of vascular plants, including not only the renowned groves of massive giant sequoia, but also vast tracts of montane forests, alpine habitats, oak woodlands, and chaparral. SEKI also supports a wide diversity of animal species, reflecting their range in elevation, climate, and habitat variety.

SEKI hosted 1,697,617 visitors in 2012, with an average of 1,620,444 visitors annually from 2009 to 2012¹. Recreational activities vary with each season and include day hiking, backpacking, horseback riding, stock use, rock climbing, snow sports, snow play, and auto touring². Approximately 96.85 percent of SEKI is designated and managed as wilderness (838,000 acres).

The Lower Kaweah burn dump site is located in the Lower Kaweah area of the Giant Forest in SEKI (**Figure 1**) which is home to many of the world's biggest trees. The site is located approximately 1,900 feet west of Highway 198, also known as Generals Highway (**Figure 2**). The Giant Forest Museum and Visitor Center are located directly across Generals Highway. The closest community is Three Rivers, located 22 miles down Generals Highway, west of the site; and the closest city is Visalia, located 51 miles to the west.

The Site is located near an old incinerator and maintenance yard, approximately 1,350 feet northwest of the Giant Forest Museum. The Site covers an approximate 11,500-square-foot area of non-symmetrical shape at an elevation of around 6,400 feet above mean sea level (amsl). The dump area is mainly level and gentle slopes (approximately 0.13 ft/ft) to the

¹ National Park Service, "Sequoia and Kings Canyon – Fact Sheet 2013". August 23, 2013.

² National Park Service, "Sequoia and Kings Canyon – Things To Do", last updated 05/26/2013, accessed 05/29/2013, <http://www.nps.gov/seki/planyourvisit/things2do.htm>

southwest. The thickness of the dump fill material ranges from 2 to 9 feet, with an estimated average thickness of 5 feet. A pine forest surrounds the area with topography sloping gently to the southwest (approximately 0.17 ft/ft). Numerous large downed pine trees cross portions of the Site and the general vicinity. A large granite slab (bedrock) exists on the north side of the adjacent trail road, and slopes towards the dump.

2.2 SEQUOIA AND KINGS CANYON NATIONAL PARKS HISTORY

Sequoia National Park was established on September 25, 1890. The park spans 404,063 acres. Encompassing a vertical relief of nearly 13,000 feet, the park contains, among its natural resources, the highest point in the contiguous 48 United States, Mount Whitney, at 14,494 feet amsl (4417.8m). Kings Canyon National Park was established on March 4, 1940, and covers 461,901 acres. It incorporated General Grant National Park, established in October 1, 1890, to protect the General Grant Grove of giant sequoias. Sequoia National Park is south of and contiguous with Kings Canyon National Park; since 1943 the two parks are administered together by the NPS.

2.3 LOWER KAWEAH DUMP SITE HISTORY

NPS identified an old dumpsite during inspections of the Lower Kaweah area within the Giant Forest at Sequoia National Park. The specific contents of the suspected dumpsite were undocumented and unknown, but thought to include burn ash from the Lower Kaweah incinerator. In 1998³ and 2001⁴, Kleinfelder, Inc. (Kleinfelder) conducted two site investigations at the suspected dumpsite. These investigations reported that materials present on the surface of the dump pile consisted of wood, concrete, asphalt fragments, and other debris. The contents of the dump fill consisted mostly of burn materials overlain by approximately 1.5 feet of soil cover on average, with some areas missing this soil cover. Some of the observed fill materials consisted of ash, metal, glass, sheet metal, porcelain, aluminum pans and pitchers, wire, pipes, metal paint cans and lids, wood chips and roots. No water was observed along the bedrock surface below the dump fill material.

The *Human Health and Ecological Risk Evaluation*⁵ (HERA) for the Site concluded that no unacceptable human or ecological effects from site contaminants are expected to occur. The HERA assumed that clean cover was intact across the waste material, although this is presently not the case. Also, the HERA used data from the Kleinfelder reports, which may not have captured worst-case concentrations due to composite sampling. Finally, background concentrations for lead and arsenic have not been established for the Site. After reviewing all the presented Site information, NPS concluded that the two site assessments performed by Kleinfelder did not completely characterize the nature and extent of contamination at the dump area.

³ Kleinfelder, Inc. *Site Investigation Report, Giant Forest – Lower Kaweah Dump Area, Sequoia National Park*. November 25, 1998.

⁴ Kleinfelder, Inc. *Lower Kaweah Dump Area Expanded Site Assessment, Sequoia National Park, California*. January 11, 2002.

⁵ U.S. Army Corps of Engineers, Sacramento District, Environmental Design Section, *Human Health and Ecological Risk Evaluation Lower Kaweah Dump Area, Sequoia National Park, California, Draft, August 2005*.

2.4 PLANNED LOWER KAWEAH DUMP SITE ACTIONS

This section briefly describes the past and future planned actions for waste materials within the Lower Kaweah dump area, including investigation, sampling, and assessment.

2.4.1 Past Activities

The NPS has conducted two site assessments (SA) and a Human Health and Ecological Risk Evaluation (HERA) of the SA data of the Lower Kaweah burn area. The sections below summarize the findings from the reports.

2.4.1.1 PREVIOUS SITE ASSESSMENT

In August 1998, Kleinfelder performed a focused site assessment⁶ (SA) at an area of the dumpsite composed mostly of burned materials and ash. Five test pits were excavated through the dump fill material, and five composite soil samples were collected from the sidewalls of the test pits. Four of the five samples collected were analyzed for cadmium, chromium, lead, zinc, nickel, and dioxins. Laboratory analytical results indicated concentrations of the five metals analyzed and dioxins below their Total Threshold Limited Concentration (TTLC) listed in the California Code of Regulations (CCR), Title 22 and therefore would not be classified as hazardous waste, if the dump fill material were removed for off-site disposal. Initially total lead and zinc concentrations were high enough (744 milligrams per kilogram [mg/kg] and 4,760 mg/kg, respectively) that testing for leaching potential was conducted. The results of citric solubility testing indicated that lead was present at 22.4 milligrams per liter (mg/l) in leachate, which is above its Solubility Threshold Limit Concentration (STLC) of 5.0 mg/l, and therefore would be classified as a California hazardous waste if removed from the site. A toxicity characteristic leaching procedure (TCLP) test was not performed on the sample, so it is unknown if the waste would be classified as a Resource Conservation and Recovery Act (RCRA) hazardous waste if removed from the Site.

In December 2001, Kleinfelder performed an expanded SA⁷ and eight exploratory trenches were excavated in the dumpsite to further define its volume and characterize the fill material. Six exploratory backhoe test pits were excavated near the topographically inferred perimeter of the dumpsite. The test pits were located in a radial pattern around the perimeter of the dump area at distances ranging from approximately 15 to 26 feet, averaging approximately 20 feet from one another. Soil samples were collected from the outer perimeter of each test pit to characterize the outer boundary of the dump. Additionally, two exploratory 13 foot-long test pits were excavated in the central area of the dump. The two interior test pits were excavated to depths of 5 feet and 9 feet, where underlying bedrock and native material were encountered. Four soil samples were collected from the two interior test pits, two from each test pit. One sample was analyzed to further characterize the dump material and the other sample was used to characterize the native soil laying underneath the dump material above the underlying bedrock. Dioxins were present in the discrete soil samples, with 2,3,7,8-TCDD reported in concentrations up to 5.4 picograms per gram (pg/g). The maximum concentration was detected in the sample collected at 4 feet bgs from test pit TP-8, excavated at the interior of the dump. This concentration is lower than the concentration reported from the composite sample collected in September 1998. Of the organochlorine pesticides, only 4,4-DDT and 4,4-DDE were

⁶ Kleinfelder, Inc. *Site Investigation Report, Giant Forest – Lower Kaweah Dump Area, Sequoia National Park*. November 25, 1998.

⁷ Kleinfelder, Inc. *Lower Kaweah Dump Area Expanded Site Assessment, Sequoia National Park, California*. January 11, 2002.

detected, but at concentrations not exceeding their respective TTLC; therefore, solubility testing for 4,4-DDT and 4,4-DDE was not performed. Of the metals detected, lead and chromium had elevated concentrations and therefore solubility tests were performed on seven soil samples. Solubility testing of lead and chromium indicated lead exceeded its CCR, Title 22, STLC of 5 mg/l; thus, the dump material would be classified as a hazardous waste if removed. TCLP solubility testing for lead did not detect concentrations exceeding the Title 22 value of 5 mg/l, and therefore the dump fill material would not be considered a RCRA hazardous waste if removed.

In 2005, the U.S. Army Corps of Engineers conducted a HERA⁸ utilizing data collected from the Kleinfelder investigations. The HERA concluded that no unacceptable human or ecological effects from site contaminants are expected to occur. The HERA assumed that clean soil completely covered the waste material. Presently, this is not the case. Also, no site-specific background concentrations for metals were established in the HERA. The HERA identified the primary chemicals of primary concern (COPCs) for ecological receptors to be dioxins/furans, dichlorodiphenyltrichloroethane (DDT), dichlorodiphenyldichloroethylene (DDE), and metals. For human receptors, COPCs are dioxins/furans and arsenic. The HERA concluded that no further investigation is required.

2.4.2 Future Activities

NPS reviewed all available Site information and concluded that the SAs did not completely characterize the nature and extent of contamination for purposes of conducting a non-time-critical removal action (NTCRA). NPS determined that a NTCRA was required to address the known and potential threats to public health, welfare, and the environment at the Site. To address gaps in the characterization of contamination and to develop and evaluate removal action alternatives in accordance with CERCLA, NPS requested preparation of an EE/CA to determine the most feasible alternative to address the waste material at the Site.

Additional site characterization, was completed in May 2014. Data collected will supplement the understanding of the nature and extent of contamination at the Lower Kaweah Dump Area. Site characterization involved sampling of waste material in the burn dump and background surface soils in the vicinity to determine appropriate response activities for the site. A draft EE/CA Report is expected to be issued for public review and comment during the winter of 2014.

3 COMMUNITY BACKGROUND

This section describes the demographics of the people living near the Site.

3.1 COMMUNITY PROFILE

The Lower Kaweah Dump Site in SEKI is located in northern Tulare County, California. The closest community is Three Rivers, also in Tulare County, California (**Figure 1**). Other nearby communities, along State Route 198, include Visalia, Farmersville, and Exeter, and Woodlake along State Route 216. The following sections summarize population and employment information for these areas.

⁸ U.S. Army Corps of Engineers, Sacramento District, Environmental Design Section, *Human Health and Ecological Risk Evaluation Lower Kaweah Dump Area, Sequoia National Park, California, Draft, August 2005*.

3.1.1 Tulare County, California

The 2010 United States Census reports that Tulare County had a population of 442,179 and estimates a population of 454,143 in 2013⁹. Employment by industry data for the county are available from the California Employment Development Department¹⁰. Notable industries for the county are agriculture (10 percent), local government (8 percent), tourism (6 percent), and trade, transportation, and utilities (6 percent).

3.2 COMMUNITY CONCERNS AND ISSUES

SEKI has an ongoing, responsive community relations and public engagement outreach strategy to notify interested parties of general park informational items and to encourage public involvement in project planning. Based upon SEKI's understanding of the public's concerns, and the limited size of the current project, SEKI utilized its current mailing list to identify entities and notify them of the activities associated with the EE/CA. Subsequently, SEKI distributed outreach letters, postcards, and electronic mail (e-mail) to citizens, media outlets, public agencies, libraries, and area tribal groups. General public notice and public interest inquiries were solicited on the NPS Planning, Environment, and Public Comment (PEPC) website: <http://parkplanning.nps.gov/LowerKaweahCERCLA>, local libraries and through local media outlets.

3.2.1 Public Notification and Level of Community Concern

The NPS utilized its current mailing list for transmitting informative letters to those entities potentially concerned with activities at the burn dump site. The informative letters requested that parties respond to NPS or ECM to indicate the level of interest in the Lower Kaweah burn dump site. The letter was distributed to 27 local libraries, 45 tribal community chairpersons, 42 additional tribe-affiliated members, and 260 interested parties. In addition, the informative letter was sent via e-mail to 575 entities and a press release was sent to an additional 148 media outlets.

In response to the letters and e-mail, ECM and NPS received nine replies from parties requesting to be kept informed of the availability of the EE/CA document. Four of these responses were received on the PEPC website. Two entities requested to be removed from future notification of this project.

3.2.1.1 PREFERENCES FOR INFORMATION DISSEMINATION

The NPS PEPC website (<http://parkplanning.nps.gov/LowerKaweahCERCLA>) for the Lower Kaweah Burn Dump Site (Lower Kaweah Site #11 Remediation Project) provides all information regarding the dump site and all associated documents related to activities. Notices will be published at key milestones in the EE/CA process, as necessary, and presented on the NPS website. A notice of availability of important documents will be provided to the local newspaper and on the NPS website. Letters or e-mail publicizing their availability will be sent to entities on the parks' mailing lists, including those parties who have expressed a specific interest in the EE/CA process. Through these notifications, the public will be invited to review and comment on the EE/CA Report during the minimum 30-day review period, which is expected to occur in the fall of 2014.

⁹ U.S. Department of Commerce. (Last Revised March 27, 2014). State & County Quick Facts, Tulare County, California. Retrieved from <http://quickfacts.census.gov/qfd/states/06/06107.html>

¹⁰ State of California Employment Development Department, Labor Market Information for Tulare County, California. Retrieved on June 3, 2014 from <http://www.labormarketinfo.edd.ca.gov/county/tulare.html#PRO>.

Current methods of dispersing information to the public include e-mail, letters, PEPC website notices, press releases, and information placed in the area libraries. In addition, information will be submitted to local media outlets and may be included in those forums.

4 COMMUNITY INVOLVEMENT ACTIVITIES

This section discusses the CRP's goals, objectives and techniques to be employed to meet the program objectives. On the basis of the findings from the interviews described below, overall goals can be developed for the CRP. These goals are described in this section, as well as the possible techniques for implementation.

Because each CERCLA site is unique, the CRP must be tailored to a particular community needs and situation. However, the CRP required by CERCLA and NCP must include certain uniform elements. A CRP issued in the context of non-time-critical removal actions is required to have the information presented in the following table.

Table 1: CRP Requirements Under CERCLA and NCP

Requirement	Source	Status
Establish administrative record file and information repository	NCP 300.415 (n)(4)(i)	Requirement completed.
Publish notice of availability of administrative record (AR) file in major local newspaper	NCP 300.415 (n)(4)(i)	Requirement completed. AR is updated as needed and is available on the NPS PEPC website.
Solicit Community Response Notification Letters	NCP 300.415 (n)(4)(i)	Requirement completed August 16, 2013.
Prepare CRP prior to completion of EE/CA	NCP 300.415 (n)(4)(i)	Requirement completed in March 2014.
Establish agency spokesperson	NCP 300.415 (n)(1)	Requirement completed. See Section 4.1 , below.
Publish notice of availability and brief description of EE/CA in a major local newspaper	NCP 300.415 (n)(4)(ii)	Will occur when EE/CA Report is ready for public review – expected Fall 2014.
Public comment period for EE/CA – 30 day minimum	NCP 300.415 (n)(4)(iii)	Will occur when EE/CA Report is ready for public review – expected Fall 2014.
Responsiveness Summary – prepare a written response to significant comments and make document available in the administrative record file.	NCP 300.415 (n)(4)(iv)	Will be completed after the end of the public comment period, as part of the Final EE/CA Report.

Further details of some of the above mentioned items are covered below.

4.1 COMMUNITY RELATIONS COORDINATOR

The contact person within NPS for the Lower Kaweah site is Nancy Hendricks, Environmental Protection Specialist. Ms. Hendricks will act as a spokesperson for the NPS to inform the public and act as liaisons between the NPS, local community, government officials, and others, as needed. Contact information is included in **Section 4.6**.

4.2 ADMINISTRATIVE RECORD AND INFORMATION REPOSITORIES

The administrative record (AR) file is housed in the public information repositories and contains all the documents which the NPS considers or relies upon in the EE/CA process. NPS will update the AR file in the repositories at key points during the EE/CA process. The repositories can be visited at the NPS PEPC website at <http://parkplanning.nps.gov/LowerKaweahCERCLA> or at the following location, by appointment only:

Visalia Branch Library
200 West Oak Avenue
Visalia, CA 93291-4931
Tuesday through Saturday: 9:00 a.m. to 5:00 p.m.

4.3 PUBLIC COMMENT PERIOD

A public comment period of at least 30 days will be held upon completion of the EE/CA Report. During this period, interested parties may provide NPS with written comments on the EE/CA Report, including the proposed cleanup action. A responsiveness summary that addresses significant public comments will be prepared as part of the Final EE/CA Report and placed in the AR file.

4.4 PUBLIC NOTICES AND PUBLIC MEETINGS

Following the completion of the EE/CA Report, a public *Notice of Availability* will be published in the Tulare Voice and/or the Visalia-Times Delta newspapers. The notice will do the following:

- Briefly describe the EE/CA Report;
- Announce its availability for review;
- List the dates for the 30-day response period;
- Identify a contact person;
- List the locations where the EE/CA Report can be reviewed;
- Identify where written comments should be sent; and
- Provide the date, time and location of a public meeting on the EE/CA Report.

The notice will be published at least two weeks in advance of the opening of the public comment period.

Notice may be provided by other means such as mailing a courtesy copy of the Notice of Availability to those on the interested parties list, posting the public comment period on the NPS website, and distributing news releases.

A public meeting will be held during the EE/CA comment period, if NPS deems it necessary, based upon public comments and requests. The public meeting will include a presentation followed by a question and answer and oral comment period. A responsiveness summary will

be prepared in response to the significant comments made either at the meeting or otherwise provided during the comment period.

4.5 KEY PUBLIC INVOLVEMENT CONTACTS

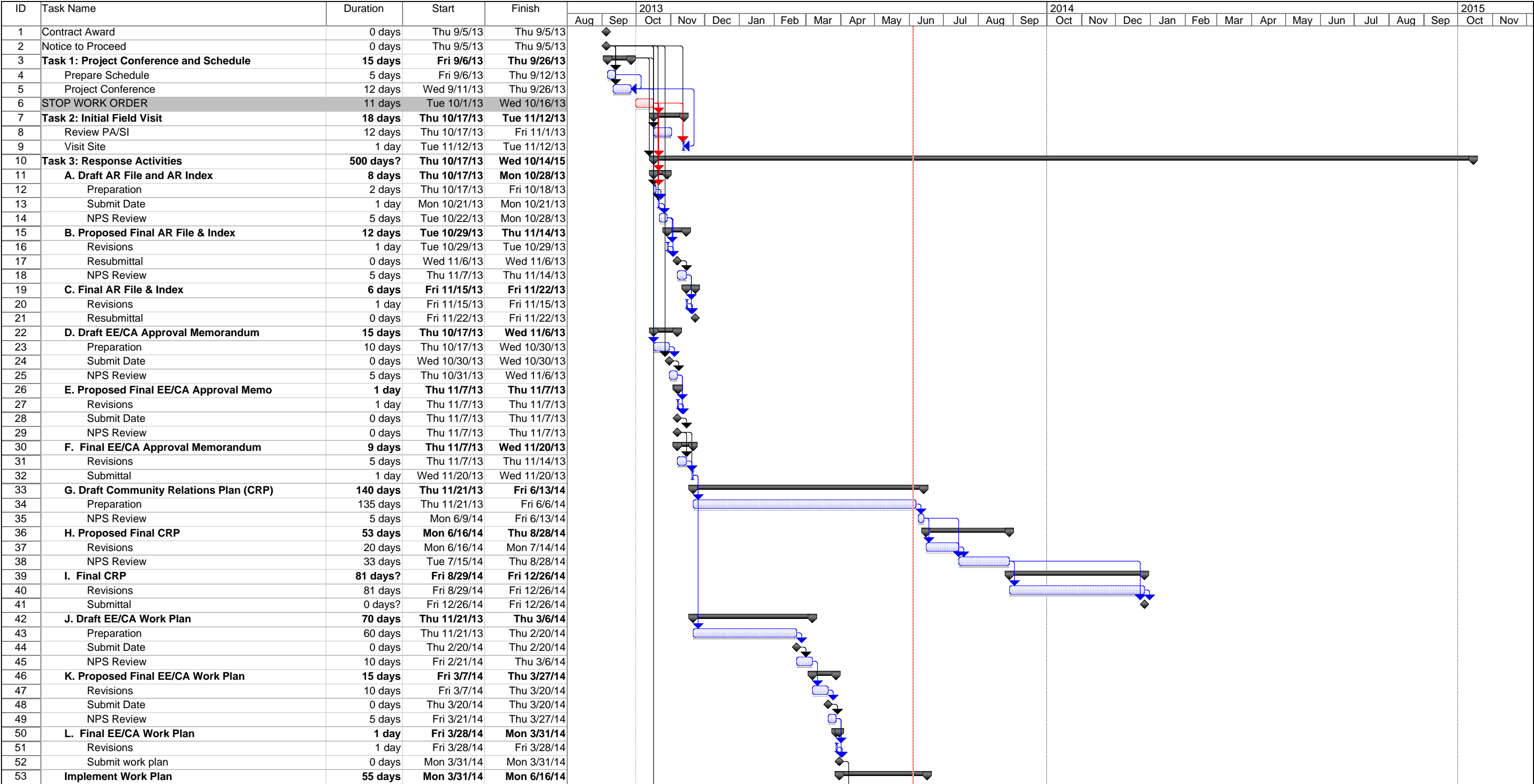
This section lists personnel involved with the project, including key individuals involved from regulatory agencies. These people may be called by individuals wishing to ask questions about or comment on the investigation, process, and future prospects.

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5 SCHEDULE

The project schedule, through the finalization of the EE/CA, appears on the following two pages. NPS will revise this schedule as the dates of future tasks become apparent.



Normal Noncritical Task

Normal Critical Task

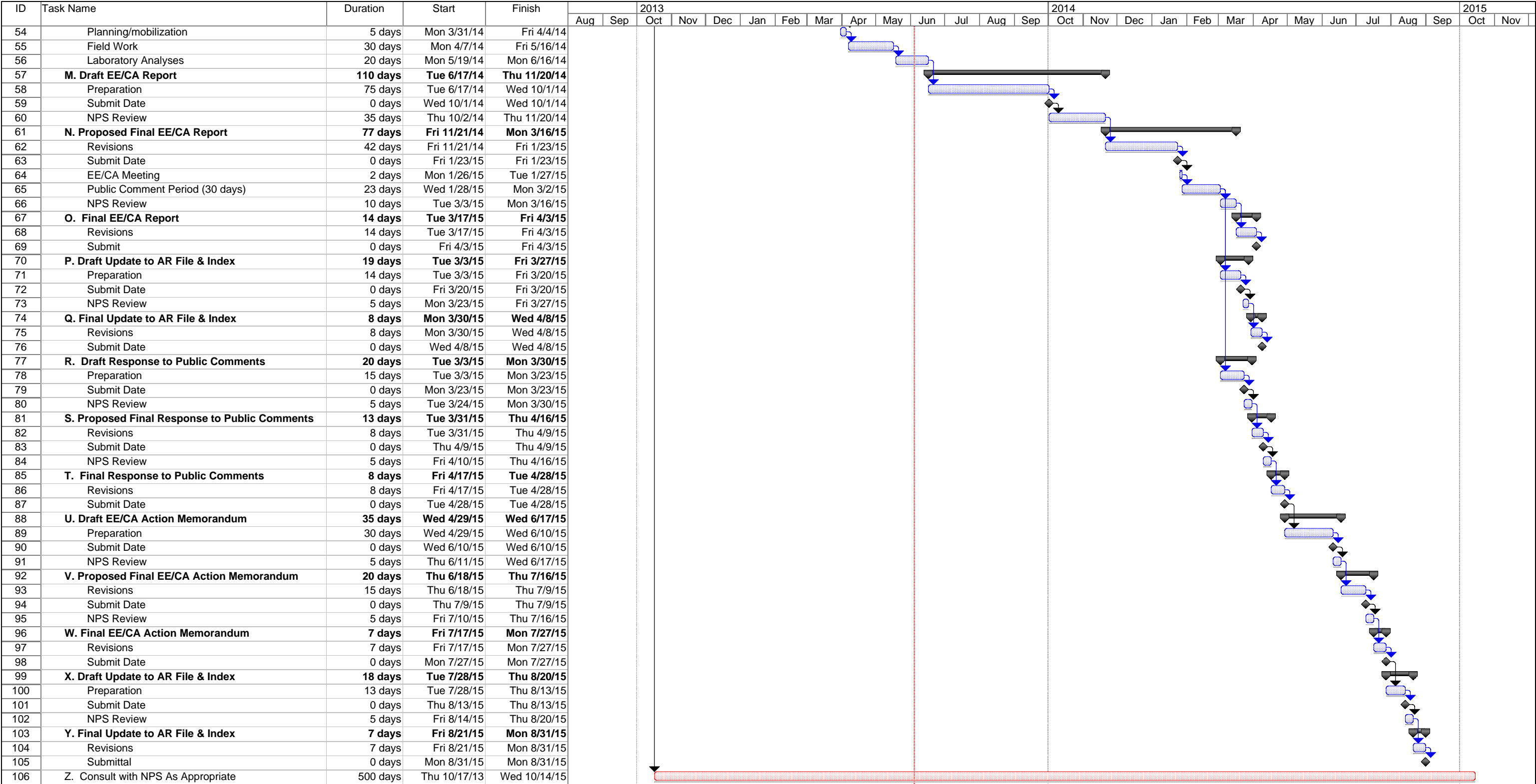
Progress

Milestone

Summary

Split

Deadline



Normal Noncritical Task

Normal Critical Task

Progress

Milestone

Summary

Split

Deadline