

Steve Gill

From: Morales, Susan <Morales.Susan@epa.gov>
Sent: Wednesday, June 08, 2016 4:04 PM
To: Steve Gill
Cc: Eric Traynor; Kathy Falconer
Subject: RE: Request to spend 128(a) funds, EPA Site Eligibility Concurrence: Riverstone to Huetter Former BNSF ROW, Coeur d'Alene, ID

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Steve, I concur the site continues to be eligible as a Brownfield for site work. ESA and NHPA have been addressed. Thank you for all the documentation.

SUSAN MORALES | BROWNFIELD COORDINATOR
ENVIRONMENTAL CLEANUP OFFICE | U.S. ENVIRONMENTAL PROTECTION AGENCY | REGION 10
1200 SIXTH AVE. SUITE 900 (ECL-122)
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From: Steve.Gill@deq.idaho.gov [mailto:Steve.Gill@deq.idaho.gov]
Sent: Friday, June 03, 2016 4:34 PM
To: Morales, Susan <Morales.Susan@epa.gov>
Cc: Eric.Traynor@deq.idaho.gov; Kathy.Falconer@deq.idaho.gov
Subject: RE: Request to spend 128(a) funds, EPA Site Eligibility Concurrence: Riverstone to Huetter Former BNSF ROW, Coeur d'Alene, ID

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See the attached Final Phase I dated 5/12/2015. On May 28, 2015, the City of Coeur d'Alene and Ignite CDA, local urban renewal agency, approved the purchase of BNSF ROW for \$2.5 M. The City's contribution was \$1,016,273. And Ignite CDA's contribution was \$1,483,727.

Does the City own the full ROW – 2.2 mile in length? Yes, the City and the URA jointly purchased the full 2.2 mile ROW and the City was quit claimed the URA's portion post May 28, 2015.

Have a great weekend!

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To: Steve Gill

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The purpose of this site eligibility request is to provide the residents of Kootenai County and Coeur d'Alene, Idaho with information regarding the potential contamination via a limited Phase II hazardous substances site characterization on the former Burlington Northern Santa Fe Railway Company (BNSF) Right of Way (ROW) that runs from Riverstone to Huetter in Coeur d'Alene. The ROW is approximately 60 feet wide and runs the entire 2.2 miles.

PROPERTY INFO:

Property Name: Riverstone to Huetter Connector (former Burlington Northern Santa Fe Railway Company Right of Way)

Property Address: 2.2 mile abandoned BNSF railroad corridor

Latitude and Longitude: Beginning (Riverstone): Latitude: 47°41'26.43"N Longitude: 116°48'17.79"W

End (Huetter Ave): Latitude: 47°42'3.50"N Longitude: 116°51'3.59"W

City: Coeur d'Alene

County: Kootenai

Zoning: Recreation

Size: 19.85 acres

BACKGROUND: The land has been used as a railroad line for over 100 years. Burlington Northern Santa Fe Railway Company (BNSF) purchased the property in 1981. The line was used primarily to provide rail service to the various lumber mills along the Spokane River in the vicinity of Coeur d'Alene. In the early 1900s there were hourly electric train services along this corridor linking Spokane, Washington, to Coeur d'Alene. The Surface Transportation Board (STB) approved BNSF's application for abandonment of the approximately 60-foot right-of-way (ROW) on November 27, 2009 and the tracks and ties were subsequently removed. All adjacent lumber mills have been demolished and removed. The rail corridor lies in close proximity to the Spokane River.

In March 2015, the City of Coeur d'Alene and Ignite CDA, the City's Urban Renewal Agency (URA) applied to IDEQ's Brownfields program to have a Phase I ESA completed prior to purchasing the ROW. For purposes of the Phase I ESA, the ROW was divided into three zones based upon historic industrial uses.

- In Zone 1 and 3, the Phase I identified RECS for heavy metals and PAHs from historic rail activity. Additional characterization is recommended for surface soils (i.e., <18 inches bgs) for RCRA 8 metals and PAHs.
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PROPOSED BROWNFIELDS ASSESSMENT AND COST: Phase II site assessment estimated cost \$ 51,190. The sampling design will consist of Incremental Sampling Methods (ISM). The property will be divided into seventeen separate decision units (see attached figures). Chemicals of concern are RCRA 8 metals and PAHs in all seventeen decision units. Three decision units (DU2.2.A, DU2.2B and DU2.2C) will also be delineated for SVOC's. Samples will be collected from the surface to a maximum depth of 12 inches using direct push methods.

SUPPORTING DOCUMENTATION (Attached)

1. EPA Site Eligibility Request (*BF EPA Site Eligibility Riverstone to Huetter Connector 05-23-2016.doc*)
2. NHPA SHPO Request 01/21/2016 (*BF NHPA Request Riverstone-Huetter Connector 01-21-2016.pdf*)
3. NHPA SHPO Determination – 02/08/2016 (*BF NHPA Determination Riverstone-Huetter Connector 02-08-2016.pdf*)

4. NHPA THPO Request & receipt – 01/21/2016 - no reply in 30 day period (*BF THPO Request Coeur d'Alene Tribe Riverstone to Huetter Connector 01-21-2016.pdf* and *BF THPO Receipt Coeur d'Alene Tribe 01-25-2016.pdf*)
5. 2nd NHPA SHPO Request with Supporting Report-Figures 04/29/2016 (*BF NHPA Request with Supporting Report-Figures for Riverstone-Huetter Connector 04-29-2016.pdf*)
6. 2nd NHPA SHPO Determination – 05/17/2016 (*BF NHPA Determination Riverstone-Huetter Connector 05-17-2016.pdf*)
7. ESA Request to Idaho Fish & Game (IDFG) – 04/11/2016 (*BF ESA Request Riverstone-to-Huetter BNSF Corridor 04-11-2016 .pdf*)
8. ESA Determination from IDFG 04-21-2016 (*BF ESA Determination Riverstone-to-Huetter BNSF Corridor 04-21-2016.pdf*)
9. Three (3) Figures:
 - a. (*BF PII TerraGraphics Riverstone to Huetter Zone 1 IMS Figure 03-30-2016.pdf*)
 - b. (*BF PII TerraGraphics Riverstone to Huetter Zone 2 IMS Figure 03-30-2016.pdf*)
 - c. (*BF PII TerraGraphics Riverstone to Huetter Zone 3 IMS Figure 03-30-2016.pdf*)

Regards,

Steve Gill | Brownfields and VCP Specialist

Idaho Department of Environmental Quality
2110 Ironwood Parkway
Coeur d'Alene ID 83814
Phone: 208.666.4632
Cell: 208.215.5986
Email: steve.gill@deq.idaho.gov
DEQ Web Page: www.deq.idaho.gov

**SITE ELIGIBILITY DETERMINATION FOR IDEQ BROWNFIELD RESPONSE
PROGRAM – SITE SPECIFIC ASSESSEMENT**

1. Grantee: **IDEQ 128 Grant– Brownfield Response Program**
2. Date of this document: **May 23, 2016** Date of proposed assessment: **July 15, 2016**

A. BASIC SITE INFORMATION

3. Property Name: **Riverstone to Huetter Connector (former Burlington Northern Santa Fe Railway Company Right of Way)**
4. Property Address: **2.2 mile abandoned BNSF railroad corridor approximately 60 feet wide**
Legal Description (if known): **Latitude and Longitude:**
Beginning (Riverstone): Latitude: 47°41'26.43"N Longitude: 116° 48'17.79"W
End (Huetter Ave): Latitude: 47°42'3.50"N Longitude: 116° 51'3.59"W
Acres: **19.85 acres**
5. Work to be done: **Phase II**
6. Who is the current owner of the property? **City of Coeur d'Alene**
700 E. Mullan Ave.
Coeur d'Alene, ID 83814

7. Describe your relationship with the owner and their role in the work to be performed:
The City of Coeur d'Alene and Ignite CDA, the City's Urban Renewal Agency (URA) submitted a Brownfields Assessment Request to IDEQ. IDEQ scored the proposal and it passed. IDEQ does not have a relationship with either the City of Coeur d'Alene or Ignite CDA.

8. Contaminant(s) (check one): **X Hazardous Substances**

9. Describe the type of activities that have been conducted on the property and indicate generally when such activities took place. Identify when and how the site became/may have been contaminated; with what substance(s); the part(s) of the site that are contaminated; and describe previous known uses.

The land has been used as a railroad line for over 100 years. Burlington Northern Santa Fe Railway Company (BNSF) purchased the property in 1981. The line was used primarily to provide rail service to the various lumber mills along the Spokane River in the vicinity of Coeur d'Alene. In the early 1900s there were hourly electric train services along this corridor linking Spokane, Washington, to Coeur d'Alene.

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B. SITES NOT ELIGIBLE FOR FUNDING BY STATUTE

Please answer the following questions to the best of your knowledge:

1. Is the facility listed (or proposed for listing) on the National Priorities List? **NO**
2. Is the facility subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA? **NO**
3. Is the facility subject to the jurisdiction, custody, or control of the US government. (Land held in trust by the US government for an Indian tribe is eligible.) **NO**

Note: If you answered YES to any of the above (B.1-3) the property is not eligible.

C. SITES ONLY ELIGIBLE FOR FUNDING WITH A PROPERTY SPECIFIC DETERMINATION BY EPA:

Certain properties can only be approved with a Property Specific Determination by EPA. Please answer the following questions to the best of your knowledge:

1. Is the site/facility subject to a planned or **ongoing** CERCLA removal action? **NO**
2. Has the site/facility been subject to an order or consent decree, or issued a permit by the

U.S. or an authorized state under the Solid Waste Disposal Act (as amended by the Resource Conservation and Recovery Act (RCRA)), the Federal Water Pollution Control Act (FWPCA), the Toxic Substances Control Act (TSCA), or the Safe Drinking Water Act (SWDA)? **NO**

3. Is the site/facility subject to corrective action orders under RCRA (sections 3004(u) or 3008(h))? **NO**
4. Is the site/facility a land disposal unit that has submitted a RCRA closure notification under subtitle C of RCRA and is subject to closure requirements specified in a closure plan or permit? **NO**
5. Has the site/facility had a release of polychlorinated biphenyls (PCBs) that is subject to remediation under TSCA? **NO**
6. Has the site/facility received funding for remediation from the leaking Underground Storage Tank (LUST) Trust Fund? **NO**

Note: If you answered YES to any of the above (C. 1-6), please complete this outline, including the information requested in Appendix A, and provide the outline to EPA for review/approval.

D. IS ANY OF THE WORK BEING PERFORMED IN ORDER TO COMPLY WITH ANY FEDERAL ENVIRONMENTAL REQUIREMENTS? NO

If yes, site/work is ineligible for funding per statute; call EPA project officer or ORC to discuss.

E. HAZARDOUS SUBSTANCE/COMMINGLED CONTAMINATION SITES

(for Petroleum only sites, skip to F.)

1. Owner: Does the grantee own the site? **NO**

If the grantee owns the property being cleaned up, indicate which of the following bases for determining that the grantee is not potentially liable as an owner under Section 107(a) of CERCLA applies, and briefly describe the circumstances.

- The owner is a recognized tribal government entity and is not a “person” under the definition of CERCLA.
- The owner acquired the property “involuntarily,” such as by foreclosure or eminent domain or bequest.
- The contamination migrated from an adjacent property such that the owner qualifies for and has satisfied the contiguous property owner exception to liability, including all appropriate inquiry, reasonable steps, notice and access/institutional controls cooperation.
- The owner satisfies the elements of the Bona Fide Prospective Purchaser exception to liability, including all appropriate inquiry, reasonable steps, notice and

access/institutional controls cooperation.

___ Other? _____

Explain the circumstances: _____

Owners of property with known or suspected hazardous or commingled contamination may only work on sites for which they can assert one of the defenses to CERCLA liability above.

Grantees may assess sites which they do not own where there is substantial public benefit or other compelling reason to use public funds for the cleanup, even if the owner is a potentially responsible party. In such cases EPA recommends documenting the rationale for doing so.

2. Operator: Did the grantee conduct, direct or allow others to conduct any activities that caused or contributed to the property contamination? **NO**

3. Generator or transporter: Did the grantee generate or transport any waste brought to the site? **NO** (*Operators, generators and transporters cannot use EPA funds to work on known or suspected hazardous or commingled contamination sites*)

F. PETROLEUM ONLY CONTAMINATION SITES

State Determination Attached ___ YES ___ NO

All petroleum sites need a written determination of eligibility by the State Environmental Agency or EPA based on the answers to Section F and the rest of the questions in this outline (except section E). Please answer these questions AND attach such a determination if one has been made, or if not, discuss with EPA. The determination must address 4 statutory criteria.

1) "Relatively Low Risk"

The State or EPA will have to determine that this site is of "Relatively Low Risk" compared to other petroleum-only sites in the State. Two key questions for this determination follow:

a) Have Leaking Underground Storage Tank funds been expended at this site?

___ YES ___ NO ___ DON'T KNOW

b) Have Federal Oil Pollution Act response funds been expended at this site?

___ YES ___ NO ___ DON'T KNOW

"A Site for Which there is No Viable Responsible Party"

c) Was the site last acquired through tax foreclosure, abandonment or equivalent government proceedings? ___ YES ___ NO

d) Has a responsible party been identified through:

i) a judgment rendered in a court of law or an administrative order that would require any party to assess, investigate, or cleanup the site: ___ YES ___ NO or

ii) a filed enforcement action brought by federal or state authorities that would require any party to assess, investigate, or cleanup the site: ___ YES ___ NO or

iii) a citizen suit, contribution action or other third party claim against the current or immediate past owner, that would, if successful, require that party to assess, investigate, or clean up the site: ___ YES ___ NO

Explain any "yes" answers _____

Skip to 2e if the site was acquired through tax foreclosure, abandonment or equivalent government proceedings; if not, answer questions 2c and 2d.

- e) The current owner is: _____
Has the current owner:
- i) dispensed or disposed of petroleum or petroleum product at the site? YES NO
 - ii) owned the property during the dispensing or disposal of petroleum product at the site? YES NO
 - iii) exacerbated the contamination at the site? YES NO
 - iv) taken reasonable steps with regard to contamination at the site? YES NO
- Explain any "yes" answers _____

- f) The immediate past owner is: _____
Has the immediate past owner:
- i) dispensed or disposed of petroleum or petroleum product at the site? YES NO
 - ii) owned the property during the dispensing or disposal of petroleum product at the site? YES NO
 - iii) exacerbated the contamination at the site? YES NO
 - iv) taken reasonable steps with regard to contamination at the site? YES NO
- Explain any "yes" answers _____

- g) Based on the above, for purposes of Brownfields funding, is there a responsible party?
 YES NO *If "YES" go on to 2.f, if "NO" proceed directly to #3.*

- h) If there is a responsible party, is that party viable (has adequate financial resources to pay for assessment of the site)? YES NO *If "NO," explain the basis for that conclusion:*
- _____

If there is a viable responsible party the petroleum site is ineligible. If there is no responsible party, or if there is a responsible party who is not viable, continue. NOTE: States may apply their own laws and regulations to make the petroleum site determination instead of the previous questions; if they do so, please provide their determination and rationale.

2) "Cleaned Up By a Person Not Potentially Liable"

- a) Has the grantee ever
- i) dispensed or disposed of petroleum or petroleum product at the site? YES NO
 - ii) exacerbated the contamination at the site? YES NO

If "YES" to either 3.a.i or 3.a.ii, explain how the grantee took "reasonable steps" with respect to the contamination.

- 3) Is the site "subject to any order issued under Sec. 9003(h) of the Solid Waste Disposal Act?"
 YES NO

G. ACCESS

Does grantee have access or an access agreement for this property? **YES**

H. SITE ELIGIBILITY DETERMINATION BY GRANTEE

Site **is eligible** for clean up activities using EPA Brownfields Funds

Steve W. Gill 
Name of Person Who Completed Evaluation

May 23, 2016
Date:

EPA Review Results

- EPA accepts grantee's determination site is eligible based on information provided [Explain if EPA is making the Petroleum Determination];
- EPA accepts grantee's determination site is eligible based on information provided and the Property Determination documented in Appendix A (see next page); or
- EPA does not have sufficient or appropriate information to agree the site is eligible. Need the following information or need to discuss

EPA Representative: _____ Date: _____

**APPENDIX A: [IF REQUIRED]
INFORMATION TO SUPPORT PROPERTY SPECIFIC DETERMINATION BY EPA**

Explain why Brownfields financial assistance is needed and how it will protect human health and the environment and either promote economic development or enable the creation of, preservation of, or addition to parks, greenways, undeveloped property, other recreational property, or other property used for nonprofit purposes:

FOR EPA USE:

Site is excluded from the definition of a Brownfields site in 101(39)(B) but EPA has determined the site is is not eligible for funding per 101(39)(C) based on the information provided by the requestor.

EPA Brownfields Project Manager

Date

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Attachments: BF NHPA Pre-Phase II ESA Cultural Resource Investigation Report-R.L. Sappington for Riverstone-Huetter Connector 04-22-2016.pdf; BF PI w-o appendicies TerraGraphics Riverstone-Huetter Connector 05-12-2015.pdf

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On May 28, 2015, the City of Coeur d'Alene and Ignite CDA, local urban renewal agency, approved the purchase of BNSF ROW for \$2.5 M. The City's contribution was \$1,016,273. And Ignite CDA's contribution was \$1,483,727. The City envisions the conversion of the former rail ROW to a pedestrian-bicycle path along the Coeur d'Alene river frontage. The City has strong interest in, and public support for, redeveloping this property for a public ped/bike trail, green space and public waterfront access. The corridor contains some of the last remaining opportunities for public access to the Spokane River in Coeur d'Alene.

PROPOSED BROWNFIELDS ASSESSMENT AND COST: Phase II site assessment estimated cost \$ 51,190. The sampling design will consist of Incremental Sampling Methods (ISM). The property will be divided into seventeen separate decision units (see attached figures). Chemicals of concern are RCRA 8 metals and PAHs in all seventeen decision units. Three decision units (DU2.2.A, DU2.2B and DU2.2C) will also be delineated for SVOC's. Samples will be collected from the surface to a maximum depth of 12 inches using direct push methods.

SUPPORTING DOCUMENTATION (Attached)

1. EPA Site Eligibility Request (*BF EPA Site Eligibility Riverstone to Huetter Connector 05-23-2016.doc*)
2. NHPA SHPO Request 01/21/2016 (*BF NHPA Request Riverstone-Huetter Connector 01-21-2016.pdf*)
3. NHPA SHPO Determination – 02/08/2016 (*BF NHPA Determination Riverstone-Huetter Connector 02-08-2016.pdf*)
4. NHPA THPO Request & receipt – 01/21/2016 - no reply in 30 day period (*BF THPO Request Coeur d'Alene Tribe Riverstone to Huetter Connector 01-21-2016.pdf* and *BF THPO Receipt Coeur d'Alene Tribe 01-25-2016.pdf*)
5. 2nd NHPA SHPO Request with Supporting Report-Figures 04/29/2016 (*BF NHPA Request with Supporting Report-Figures for Riverstone-Huetter Connector 04-29-2016.pdf*)
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9. Three (3) Figures:
 - a. (*BF PII TerraGraphics Riverstone to Huetter Zone 1 IMS Figure 03-30-2016.pdf*)
 - b. (*BF PII TerraGraphics Riverstone to Huetter Zone 2 IMS Figure 03-30-2016.pdf*)
 - c. (*BF PII TerraGraphics Riverstone to Huetter Zone 3 IMS Figure 03-30-2016.pdf*)

Regards,

Steve Gill | Brownfields and VCP Specialist

Idaho Department of Environmental Quality
2110 Ironwood Parkway
Coeur d'Alene ID 83814
Phone: 208.666.4632
Cell: 208.215.5986

Steve Gill

From: Steve Gill
Sent: Monday, May 23, 2016 12:26 PM
To: Susan Morales (morales.susan@epa.gov)
Cc: Eric Traynor; Kathy Falconer
Subject: Request to spend 128(a) funds, EPA Site Eligibility Concurrence: Riverstone to Huetter Former BNSF ROW, Coeur d'Alene, ID
Attachments: BF EPA Site Eligibility Riverstone to Huetter Connector 05-23-2016.doc; BF NHPA Request Riverstone-Huetter Connector 01-21-2016.pdf; BF NHPA Determination Riverstone-Huetter Connector 02-08-2016.pdf; BF NHPA Request with Supporting Report-Figures for Riverstone-Huetter Connector 04-29-2016.pdf; BF NHPA Determination Riverstone-Huetter Connector 05-17-2016.pdf; BF THPO Request Coeur d'Alene Tribe Riverstone to Huetter Connector 01-21-2016.pdf; BF THPO Receipt Coeur d'Alene Tribe 01-25-2016.pdf; BF ESA Request Riverstone-to-Huetter BNSF Corridor 04-11-2016.pdf; BF ESA Determination Riverstone-to-Huetter BNSF Corridor 04-21-2016.pdf; BF PII TerraGraphics Riverstone to Huetter Zone 1 IMS Figure 03-30-2016.pdf; BF PII TerraGraphics Riverstone to Huetter Zone 2 IMS Figure 03-30-2016.pdf; BF PII TerraGraphics Riverstone to Huetter Zone 3 IMS Figure 03-30-2016.pdf

Hi Susan,

This site is in ACRES and has already experienced a great return on investment for IDEQ's Brownfields program. IDEQ's SRG 128a Phase I ESA cost \$19,821 and resulted in a \$2.5M purchase of the property by the City of Coeur d'Alene and Ignite CDA, the City's Urban Renewal Agency (URA) in May 2015.

The purpose of this site eligibility request is to provide the residents of Kootenai County and Coeur d'Alene, Idaho with information regarding the potential contamination via a limited Phase II hazardous substances site characterization on the former Burlington Northern Santa Fe Railway Company (BNSF) Right of Way (ROW) that runs from Riverstone to Huetter in Coeur d'Alene. The ROW is approximately 60 feet wide and runs the entire 2.2 miles.

PROPERTY INFO:

Property Name: Riverstone to Huetter Connector (former Burlington Northern Santa Fe Railway Company Right of Way)

Property Address: 2.2 mile abandoned BNSF railroad corridor

Latitude and Longitude: <u>Beginning (Riverstone):</u>	<u>Latitude: 47°41'26.43"N</u>	<u>Longitude: 116° 48'17.79"W</u>
<u>End (Huetter Ave):</u>	<u>Latitude: 47°42'3.50"N</u>	<u>Longitude: 116° 51'3.59"W</u>

City: Coeur d'Alene

County: Kootenai

Zoning: Recreation

Size: 19.85 acres

BACKGROUND: The land has been used as a railroad line for over 100 years. Burlington Northern Santa Fe Railway Company (BNSF) purchased the property in 1981. The line was used primarily to provide rail service to the various lumber mills along the Spokane River in the vicinity of Coeur d'Alene. In the early 1900s there were hourly electric train services along this corridor linking Spokane, Washington, to Coeur d'Alene. The Surface Transportation Board (STB) approved BNSF's application for abandonment of the approximately 60-foot right-of-way (ROW) on November 27, 2009 and the tracks and ties were subsequently removed. All adjacent lumber mills have been demolished and removed. The rail corridor lies in close proximity to the Spokane River.

In March 2015, the City of Coeur d'Alene and Ignite CDA, the City's Urban Renewal Agency (URA) applied to IDEQ's Brownfields program to have a Phase I ESA completed prior to purchasing the ROW. For purposes of the Phase I ESA, the ROW was divided into three zones based upon historic industrial uses.

- In Zone 1 and 3, the Phase I identified RECS for heavy metals and PAHs from historic rail activity. Additional characterization is recommended for surface soils (i.e., <18 inches bgs) for RCRA 8 metals and PAHs.
- In Zone 2, the Phase I identified RECS for heavy metals, PAHs, SVOCs, (creosote and pentachlorophenol) associated with the former railroad trestle and bone yard adjacent to ROW. Additional characterization was recommended for RCRA 8 metals, PAHs, and SVOCs (creosote and pentachlorophenol).

On May 28, 2015, the City of Coeur d'Alene and Ignite CDA, local urban renewal agency, approved the purchase of BNSF ROW for \$2.5 M. The City's contribution was \$1,016,273. And Ignite CDA's contribution was \$1,483,727. The City envisions the conversion of the former rail ROW to a pedestrian-bicycle path along the Coeur d'Alene river frontage. The City has strong interest in, and public support for, redeveloping this property for a public ped/bike trail, green space and public waterfront access. The corridor contains some of the last remaining opportunities for public access to the Spokane River in Coeur d'Alene.

PROPOSED BROWNFIELDS ASSESSMENT AND COST: Phase II site assessment estimated cost \$ 51,190. The sampling design will consist of Incremental Sampling Methods (ISM). The property will be divided into seventeen separate decision units (see attached figures). Chemicals of concern are RCRA 8 metals and PAHs in all seventeen decision units. Three decision units (DU2.2.A, DU2.2B and DU2.2C) will also be delineated for SVOC's. Samples will be collected from the surface to a maximum depth of 12 inches using direct push methods.

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Regards,

Steve Gill | Brownfields and VCP Specialist

Idaho Department of Environmental Quality
2110 Ironwood Parkway
Coeur d'Alene ID 83814
Phone: 208.666.4632
Cell: 208.215.5986
Email: steve.gill@deg.idaho.gov
DEQ Web Page: www.deg.idaho.gov



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, ID 83706 • (208) 373-0502
www.deq.idaho.gov

C. L. "Butch" Otter, Governor
John H. Tippetts, Director

January 21, 2016

Ethan Morton
Idaho State Historic Preservation Office
210 Main Street (The Assay Office)
Boise, ID 83702

Re: Potential Historical Concerns on Abandoned BNSF Railroad Corridor, Coeur d'Alene, Idaho.

Dear Mr. Morton:

The Idaho Department of Environmental Quality (IDEQ) plans to conduct an environmental site assessment on the abandoned Burlington Northern Santa Fe Railway Company (BNSF) railroad corridor and right-of-way (ROW) in Coeur d'Alene, Idaho. The BNSF ROW consists of a 60-foot wide corridor that stretches 2.2 miles along the Spokane River in Coeur d'Alene (Property). The Property totals approximately 16 acres. The ROW begins at the eastern-end of West Riverstone Drive, heads west to Huetter Avenue. The coordinates are 47°41'27.01"N; 116°48'15.19"W to 47°42'3.69"N; 116°51'2.89"W.

For the purposes of this assessment three (3) separate zones, based on former industrial uses adjacent to the Property, have been defined:

- Zone 1: Ohio Match (1921-1958), Diamond National Lumber (1959-1965), Crown Pacific/DAW (1965-2008)
- Zone 2: Atlas Tie Co. (1909-1965) and Stimson Lumber (1965-2005)
- Zone 3: Central PreMix (1950-2006) and Winton Lumber/NW Timber (1918-1990)

The Property requires environmental assessment activities that may include surface and subsurface soil samples. There may be groundwater sampling if soils sampling results indicates a need to investigate potential groundwater impacts. Soil samples will be collected by advancing soil borings using a drill rig or direct-push technology. No large scale excavations are anticipated.

IDEQ is requesting a determination letter as to whether or not there are any historic preservation concerns that SHPO may have with regard to this property. Unless SHPO identifies a specific historical concern, work may begin 30 days after receipt of this letter. If you have any questions or comments, please feel free to contact me at (208) 666-4632.

Sincerely,

A handwritten signature in blue ink, appearing to read "Steve Gill".

Steve Gill, Brownfields and VCP Specialist
Enclosures

cc: Eric Traynor, Brownfields Program Manager



C.L. "Butch" Otter
Governor of Idaho

February 8, 2016

Janet Gallimore
Executive Director

Mr. Steve Gill
Brownsfield and VCP Specialist
State of Idaho
Department of Environmental Quality
1410 North Hilton
Boise, ID 83706

Administration
2205 Old Penitentiary Road
Boise, Idaho 83712-8250
Office: (208) 334-2682
Fax: (208) 334-2774

Membership and Fund
Development
2205 Old Penitentiary Road
Boise, Idaho 83712-8250
Office: (208) 514-2310
Fax: (208) 334-2774

Historical Museum and
Education Programs
610 North Julia Davis Drive
Boise, Idaho 83702-7695
Office: (208) 334-2120
Fax: (208) 334-4059

State Historic Preservation
Office and Historic Sites
Archeological Survey of Idaho
210 Main Street
Boise, Idaho 83702-7264
Office: (208) 334-3861
Fax: (208) 334-2775

Statewide Sites:
• Franklin Historic Site
• Pierce Courthouse
• Rock Creek Station and
• Stricker Homesite

Old Penitentiary
2445 Old Penitentiary Road
Boise, Idaho 83712-8254
Office: (208) 334-2844
Fax: (208) 334-3225

Idaho State Archives
2205 Old Penitentiary Road
Boise, Idaho 83712-8250
Office: (208) 334-2620
Fax: (208) 334-2626

North Idaho Office
112 West 4th Street, Suite #7
Moscow, Idaho 83843
Office: (208) 882-1540
Fax: (208) 882-1763

RE: Abandoned BNSF Railroad Corridor, Coeur d'Alene, Idaho (Idaho SHPO REV 2016-315)

Dear Mr. Gill,

Thank you for your informational letter and project materials regarding the proposed environmental site assessment. We have reviewed the materials and recommend that the Idaho Department of Environmental on behalf of the Environmental Protection Agency retain the services of a professional archaeologist. The consult should monitor any testing involving ground disturbance in the eastern portion of Zone 1 and the southeastern portion of Zone 3. There are two previously documented archaeological sites (10KA429, 10KA480) in these areas which may retain integrity and therefore be eligible for the National Register of Historic Places.

Your consultant should obtain the site records for these two sites and develop guidance on when and where DEQ should monitor any ground disturbances within these portions of the area of potential effect. DEQ should also have a discovery protocol in place if any cultural material is discovered when a monitor is not present. We would like to be consulted on the monitoring guidance and discovery protocol prior to the initiation of environmental testing involving ground disturbance.

If DEQ follows the above recommendations our office believes the undertaking will have no adverse effect to *historic properties* (36CFR800.5).

We appreciate your consulting with our office and look forward to further consultation. If you have any questions feel free to contact me at 208-334-3847 x107 or ethan.morton@ishs.idaho.gov.

Sincerely,

Ethan Morton, Idaho State Historic Preservation Office

cc: Eric Traynor, Brownfields Program Manager, DEQ





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DEPARTMENT OF
ENVIRONMENTAL QUALITY

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C. L. "Butch" Otter, Governor
John H. Tippetts, Director

January 21, 2016

Jill Maria Wagner, Ph.D.
Tribal Historic Preservation Officer
Cultural Resources Program
Coeur d'Alene Tribe
PO Box 408 / 850 A Street
Plummer, ID 83851

Re: Potential Cultural Concerns on Abandoned BNSF Railroad Corridor, Coeur d'Alene, Idaho.

Dear Ms. Wagner:

The Idaho Department of Environmental Quality (IDEQ) plans to conduct an environmental site assessment on the abandoned Burlington Northern Santa Fe Railway Company (BNSF) railroad corridor and right-of-way (ROW) in Coeur d'Alene, Idaho. The BNSF ROW consists of a 60-foot wide corridor that stretches 2.2 miles along the Spokane River in Coeur d'Alene (Property). The Property totals approximately 16 acres. The ROW begins at the eastern-end of West Riverstone Drive, heads west to Huetter Avenue. The coordinates are 47°41'27.01"N; 116°48'15.19"W to 47°42'3.69"N; 116°51'2.89"W.

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IDEQ is requesting a determination letter as to whether or not there are any cultural concerns that the Coeur d'Alene Tribe may have with regard to this site. Unless the Tribe identifies a specific historical concern, work may begin 30 days after receipt of this letter. If you have any questions or comments, please feel free to contact me at (208) 666-4632.

Sincerely,

A handwritten signature in blue ink, appearing to read "Steve Gill".

Steve Gill, Brownfields and VCP Specialist
Enclosures

cc: Eric Traynor, Brownfields Program Manager

Steve Gill

From: Steve Gill
Sent: Friday, April 29, 2016 3:24 PM
To: 'Ethan Morton'
Cc: Robert Lee Sappington (roberts@uidaho.edu); Eric Traynor; John Means (John.Means@terragraphics.com)
Subject: RE: Abandoned BNSF Railroad Corridor, Coeur d'Alene, Idaho (Idaho SHPO REV 2016-315)
Attachments: BF NHPA Pre-Phase II ESA Cultural Resource Investigation Report-R.L. Sappington for Riverstone-Huetter Connector 04-22-2016.pdf; BF PII TerraGraphics Riverstone to Huetter Zone 1 IMS Figure 03-30-2016.pdf; BF PII TerraGraphics Riverstone to Huetter Zone 2 IMS Figure 03-30-2016.pdf; BF PII TerraGraphics Riverstone to Huetter Zone 3 IMS Figure 03-30-2016.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Ethan,

As per our correspondence on this site. Attached please find Dr. R. L. Sappington's April 22, 2016 "Cultural Resource Investigations for the Coeur d'Alene BNSF Railroad Corridor Study Along the Spokane River, Kootenai County, Idaho." It concludes that we will need an on-site archaeologist only in Zone 1 DU-1.3A, DU-1.3B and DU-1.3C.

Following is the description of DEQ's proposed Phase II site assessment activity which will be limited to the Incremental Sampling Methodology (ISM) using a Geo-Probe to drive 1-foot deep boreholes for soil sampling. No excavations are planned. The attached 3 figures show that we are limiting activity to the 60 foot wide ROW only; specifically, we are planning to:

ZONE 1 would have 5 DUs:

1. ZONE 1.1 - 1,400 feet long x 20 feet wide: DU is limited to southern 20ft, the northern 40ft will remain as an active BNSF line. DU runs from Huetter Ave to W. Shoreview Lane. Plans for this DU call for paving for public access and limited parking to Johnson Mill Park.
2. ZONE 1.2 - 1,100 feet long x 60 feet wide: DU runs parallel to Johnson Mill Park. Plans are to remove the southern one-way road and make a two-way road by joining the northern one-way (west) road. Once removed the southern road would be turned into vegetation and public park amenities.
3. ZONE 1.3A, 1.3B and 1.3C – 3 DUs each 1,400 feet long x 20 feet wide. Reasoning for 3 DUs is based on topography and past uses: the southern 20ft is the old vehicle spur road (blue), the middle 20 feet is the former track which is elevated with ballast (yellow), and the northern 20ft consists of vegetation (white). Plans for this would be trail, possibly mix of paved and natural.

ZONE 2 would have 6 DUs:

4. ZONE 2.1A, 2.1B and 2.1C – 3 DUs each 1,250 feet long x 20 feet wide. Same reasoning as ZONE 1.3A, 1.3B & 1.3C. Plans for this would be trail, possibly mix of paved and natural.
5. ZONE 2.2A, 2.2B and 2.2C – 3 DUs each 2,950 feet long x 20 feet wide. Same reasoning as ZONE 1.3A, 1.3B & 1.3C. Plans for this would be trail, possibly mix of paved and natural.

ZONE 3 would have 6 DUs:

6. ZONE 3.1A, 3.1B and 3.1C – 3 DUs each 2,950 feet long x 20 feet wide. Same reasoning as ZONE 1.3A, 1.3B & 1.3C. Plans for this would be trail, possibly mix of paved and natural.
7. ZONE 3.2A, 3.2B and 3.2C – 3 DUs each 900 feet long x 20 feet wide. Same reasoning as ZONE 1.3A, 1.3B & 1.3C. Plans for this would be trail, possibly mix of paved and natural.

Regards,

Steve Gill | Brownfields and VCP Specialist

From: Ethan Morton [<mailto:Ethan.Morton@ishs.idaho.gov>]
Sent: Monday, February 08, 2016 1:48 PM
To: Steve Gill
Subject: RE: Abandoned BNSF Railroad Corridor, Coeur d'Alene, Idaho (Idaho SHPO REV 2016-315)

The monitoring can be pretty limited. Confined to the small areas where the sites were previously documented. You may not even be testing in these areas? We can defer to the judgment of the consult you want to use.

Ethan Morton
Idaho State Historic Preservation Office
210 Main Street
Boise, Idaho 83702
208-334-3861 x107
ethan.morton@ishs.idaho.gov



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"The head of any federal agency having direct or indirect jurisdiction over a proposed federal or federally assisted undertaking in any state and the head of any federal department or independent agency having authority to license any undertaking shall, prior to the approval of the expenditure of any federal funds on the undertaking or prior to the issuance of any license, as the case may be, take into account the effect of the undertaking on any district, site, building, structure, or object that is included in or eligible for inclusion in the National Register." Section 106 of the National Historic Preservation Act of 1966 ammended through 1992 (16 U.S.C. 470f)

"Undertaking means a project, activity, or program funded in whole or in part under the direct or indirect jurisdiction of a Federal agency, including those carried out by or on behalf of a Federal agency; those carried out with Federal financial assistance; and those requiring a Federal permit, license or approval". (36 CFR 800(y))

From: Steve.Gill@deq.idaho.gov [<mailto:Steve.Gill@deq.idaho.gov>]
Sent: Monday, February 08, 2016 2:27 PM
To: Ethan Morton
Cc: Eric.Traynor@deq.idaho.gov
Subject: RE: Abandoned BNSF Railroad Corridor, Coeur d'Alene, Idaho (Idaho SHPO REV 2016-315)

Ethan,

Thanks for the quick turnaround. DEQ will include archaeologist monitoring during on-the-ground site assessment activities.

Regards,

Steve Gill | Brownfields and VCP Specialist

From: Ethan Morton [<mailto:Ethan.Morton@ishs.idaho.gov>]
Sent: Monday, February 08, 2016 10:53 AM

To: Steve Gill
Cc: Eric Traynor
Subject: Abandoned BNSF Railroad Corridor, Coeur d'Alene, Idaho (Idaho SHPO REV 2016-315)

Steve,
Our official recommendation is attached. Please do not hesitate to contact me if you have any questions.
Thank You,

Ethan Morton
Idaho State Historic Preservation Office
210 Main Street
Boise, Idaho 83702
208-334-3861 x107
ethan.morton@ishs.idaho.gov



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Steve Gill

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Sent: Monday, February 08, 2016 1:48 PM
To: Steve Gill
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210 Main Street
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ethan.morton@ishs.idaho.gov



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From: Steve.Gill@deq.idaho.gov [<mailto:Steve.Gill@deq.idaho.gov>]
Sent: Monday, February 08, 2016 2:27 PM
To: Ethan Morton
Cc: Eric.Traynor@deq.idaho.gov
Subject: RE: Abandoned BNSF Railroad Corridor, Coeur d'Alene, Idaho (Idaho SHPO REV 2016-315)

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Regards,

Steve Gill | Brownfields and VCP Specialist

From: Ethan Morton [<mailto:Ethan.Morton@ishs.idaho.gov>]
Sent: Monday, February 08, 2016 10:53 AM
To: Steve Gill

Cc: Eric Traynor

Subject: Abandoned BNSF Railroad Corridor, Coeur d'Alene, Idaho (Idaho SHPO REV 2016-315)

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Thank You,

Ethan Morton

Idaho State Historic Preservation Office

210 Main Street

Boise, Idaho 83702

208-334-3861 x107

ethan.morton@ishs.idaho.gov



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Steve Gill

From: Ethan Morton <Ethan.Morton@ishs.idaho.gov>
Sent: Tuesday, May 17, 2016 1:57 PM
To: Steve Gill
Cc: roberts@uidaho.edu; Eric Traynor; John.Means@terragraphics.com
Subject: RE: Abandoned BNSF Railroad Corridor, Coeur d'Alene, Idaho (Idaho SHPO REV 2016-315)

Steve,

We concur with the monitoring approach recommended by Dr. Sappington. If you need this in an official letter please let me know. Sorry I was not able to respond to this sooner. We are slammed right now and I just have to respond to correspondence in order of receipt.

Thank You,

Ethan Morton
Idaho State Historic Preservation Office
210 Main Street
Boise, Idaho 83702
208-334-3861 x107
ethan.morton@ishs.idaho.gov



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"The head of any federal agency having direct or indirect jurisdiction over a proposed federal or federally assisted undertaking in any state and the head of any federal department or independent agency having authority to license any undertaking shall, prior to the approval of the expenditure of any federal funds on the undertaking or prior to the issuance of any license, as the case may be, take into account the effect of the undertaking on any district, site, building, structure, or object that is included in or eligible for inclusion in the National Register." Section 106 of the National Historic Preservation Act of 1966 amended through 1992 (16 U.S.C. 470f)

"Undertaking means a project, activity, or program funded in whole or in part under the direct or indirect jurisdiction of a Federal agency, including those carried out by or on behalf of a Federal agency; those carried out with Federal financial assistance; and those requiring a Federal permit, license or approval". (36 CFR 800(y))

From: Steve.Gill@deq.idaho.gov [mailto:Steve.Gill@deq.idaho.gov]
Sent: Friday, April 29, 2016 4:24 PM
To: Ethan Morton
Cc: roberts@uidaho.edu; Eric.Traynor@deq.idaho.gov; John.Means@terragraphics.com
Subject: RE: Abandoned BNSF Railroad Corridor, Coeur d'Alene, Idaho (Idaho SHPO REV 2016-315)

Hi Ethan,

As per our correspondence on this site. Attached please find Dr. R. L. Sappington's April 22, 2016 "Cultural Resource Investigations for the Coeur d'Alene BNSF Railroad Corridor Study Along the Spokane River, Kootenai County, Idaho." It concludes that we will need an on-site archaeologist only in Zone 1 DU-1.3A, DU-1.3B and DU-1.3C.

Following is the description of DEQ's proposed Phase II site assessment activity which will be limited to the Incremental Sampling Methodology (ISM) using a Geo-Probe to drive 1-foot deep boreholes for soil sampling. No excavations are planned. The attached 3 figures show that we are limiting activity to the 60 foot wide ROW only; specifically, we are planning to:

ZONE 1 would have 5 DUs:

1. ZONE 1.1 - 1,400 feet long x 20 feet wide: DU is limited to southern 20ft, the northern 40ft will remain as an active BNSF line. DU runs from Huetter Ave to W. Shoreview Lane. Plans for this DU call for paving for public access and limited parking to Johnson Mill Park.
2. ZONE 1.2 - 1,100 feet long x 60 feet wide: DU runs parallel to Johnson Mill Park. Plans are to remove the southern one-way road and make a two-way road by joining the northern one-way (west) road. Once removed the southern road would be turned into vegetation and public park amenities.
3. ZONE 1.3A, 1.3B and 1.3C – 3 DUs each 1,400 feet long x 20 feet wide. Reasoning for 3 DUs is based on topography and past uses: the southern 20ft is the old vehicle spur road (blue), the middle 20 feet is the former track which is elevated with ballast (yellow), and the northern 20ft consists of vegetation (white). Plans for this would be trail, possibly mix of paved and natural.

ZONE 2 would have 6 DUs:

4. ZONE 2.1A, 2.1B and 2.1C – 3 DUs each 1,250 feet long x 20 feet wide. Same reasoning as ZONE 1.3A, 1.3B & 1.3C. Plans for this would be trail, possibly mix of paved and natural.
5. ZONE 2.2A, 2.2B and 2.2C – 3 DUs each 2,950 feet long x 20 feet wide. Same reasoning as ZONE 1.3A, 1.3B & 1.3C. Plans for this would be trail, possibly mix of paved and natural.

ZONE 3 would have 6 DUs:

6. ZONE 3.1A, 3.1B and 3.1C – 3 DUs each 2,950 feet long x 20 feet wide. Same reasoning as ZONE 1.3A, 1.3B & 1.3C. Plans for this would be trail, possibly mix of paved and natural.
7. ZONE 3.2A, 3.2B and 3.2C – 3 DUs each 900 feet long x 20 feet wide. Same reasoning as ZONE 1.3A, 1.3B & 1.3C. Plans for this would be trail, possibly mix of paved and natural.

Regards,

Steve Gill | Brownfields and VCP Specialist

From: Ethan Morton [<mailto:Ethan.Morton@ishs.idaho.gov>]

Sent: Monday, February 08, 2016 1:48 PM

To: Steve Gill

Subject: RE: Abandoned BNSF Railroad Corridor, Coeur d'Alene, Idaho (Idaho SHPO REV 2016-315)

The monitoring can be pretty limited. Confined to the small areas where the sites were previously documented. You may not even be testing in these areas? We can defer to the judgment of the consult you want to use.

Ethan Morton
Idaho State Historic Preservation Office
210 Main Street
Boise, Idaho 83702
208-334-3861 x107
ethan.morton@ishs.idaho.gov



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From: Steve.Gill@deq.idaho.gov [<mailto:Steve.Gill@deq.idaho.gov>]
Sent: Monday, February 08, 2016 2:27 PM
To: Ethan Morton
Cc: Eric.Traynor@deq.idaho.gov
Subject: RE: Abandoned BNSF Railroad Corridor, Coeur d'Alene, Idaho (Idaho SHPO REV 2016-315)

Ethan,

Thanks for the quick turnaround. DEQ will include archaeologist monitoring during on-the-ground site assessment activities.

Regards,

Steve Gill | Brownfields and VCP Specialist

From: Ethan Morton [<mailto:Ethan.Morton@ishs.idaho.gov>]
Sent: Monday, February 08, 2016 10:53 AM
To: Steve Gill
Cc: Eric Traynor
Subject: Abandoned BNSF Railroad Corridor, Coeur d'Alene, Idaho (Idaho SHPO REV 2016-315)

Steve,

Our official recommendation is attached. Please do not hesitate to contact me if you have any questions.
Thank You,

Ethan Morton
Idaho State Historic Preservation Office
210 Main Street
Boise, Idaho 83702
208-334-3861 x107
ethan.morton@ishs.idaho.gov



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Steve Gill

From: Steve Gill
Sent: Monday, April 11, 2016 2:27 PM
To: Kiira Siitari (kiira.sitari@idfg.idaho.gov)
Subject: IDEQ Brownfields Program T&E Species Question
Attachments: BF PII TerraGraphics Riverstone to Huetter Figures 03-30-2016.pdf

Hi Kiira,

IDEQ has communicated in the past with IDFG (Ray Hennekey and Mary Terra-Burns) regarding how, in order to meet EPA funding requirements for IDEQ's Brownfields program to conduct any environmental sampling effort, that we contact IDFG informally regarding the potential presence for threatened or endangered species within our proposed project boundary. Prior to 2011, EPA requested that IDEQ engage USFWS for these determinations; however, changes in the federal agreement between EPA and USFWS result in the State completing this less formal process.

The purpose of this email is that IDEQ's Brownfields program plans to conduct an environmental site assessment on the City of Coeur d'Alene's recently acquired former Burlington Northern Santa Fe Railway Company (BNSF) railroad corridor right-of-way (ROW). The BNSF ROW consists of a 60-foot wide corridor that stretches nearly 2.2 miles from West Riverstone Drive to Huetter Avenue (see attached figure). The Property totals approximately 16 acres.

The Property requires environmental site assessment activities that may include surface and subsurface soil samples. There may be groundwater sampling if soils sampling results indicates a need to investigate potential groundwater impacts. Soil samples will be collected by advancing soil borings using a drill rig or direct-push technology. No large scale excavations are anticipated. For the purposes of this assessment three (3) separate zones, based on former industrial uses adjacent to the Property, have been defined (see related figures):

- Zone 1: Ohio Match (1921-1958), Diamond National Lumber (1959-1965), Crown Pacific/DAW (1965-2008)
- Zone 2: Atlas Tie Co. (1909-1965) and Stimson Lumber (1965-2005)
- Zone 3: Central PreMix (1950-2006) and Winton Lumber/NW Timber (1918-1990)

IDEQ is asking for IDFG to let us know if any of the following terrestrial TE Species: 1) Grizzly bear, 2) Canada lynx, and 3) Selkirk Mountain Caribou might reside in this project boundary.

Regards,

Steve Gill | Brownfields and VCP Specialist

Idaho Department of Environmental Quality
2110 Ironwood Parkway
Coeur d'Alene ID 83814
Phone: 208.666.4632
Cell: 208.215.5986
Email: steve.gill@deq.idaho.gov
DEQ Web Page: www.deq.idaho.gov

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Steve Gill

From: Siitari,Kiira <kiira.siiitari@idfg.idaho.gov>
Sent: Thursday, April 21, 2016 1:16 PM
To: Steve Gill
Subject: RE: IDEQ Brownfields Program T&E Species Question

Hi Steve,

Apologies for the delayed response. The proposed project is within a developed, urban area which offers little to no habitat value to the TE species in question. As such we do not believe grizzly bear, Canada lynx, or Selkirk Mountain Caribou would reside in the project area.

Please let me know if you need additional information.

Thank you,
Kiira

Kiira Siitari

Environmental Staff Biologist

Idaho Department of Fish and Game

Panhandle Region

2885 Kathleen Avenue

Coeur d'Alene, ID 83815

Office: (208) 769-1414

Cell: (208) 258-0296

kiira.siiitari@idfg.idaho.gov

From: Steve.Gill@deq.idaho.gov [<mailto:Steve.Gill@deq.idaho.gov>]

Sent: Monday, April 11, 2016 2:27 PM

To: Siitari,Kiira

Subject: IDEQ Brownfields Program T&E Species Question

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Regards,

Steve Gill | Brownfields and VCP Specialist

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