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NOV 15 2023

DEPARTMENT OF
WATER RESOURCES

Director
Dept. of Water Resources
PO Box 83720
Boise, ID 83720-0098

RE: Proposed Area of Drilling Concern Soda Springs, Idaho
Comments, Nov. 9, 2023

Thank you for this opportunity to submit written comments after the public hearing in Soda Springs about the proposed ADC. It directly affects me, my family, our property, and the community. I am a resident at 780 South Third East in Soda Springs, ID 83276, as well as our family owning over 100 acres within the south end of the proposed ADC boundary. The land has been in the family since the 1950s and has seen five generations on it.

First, in my opinion Eric Boe, Hearing Officer, and the Greenfield Trust representatives did a good job of explaining the issues and background for the ADC. They answered several of my questions, but not all.

We, as affected property owners inside the ADC, as well as adjacent to it, have significant comments/concerns. The first is the ADC boundary on the south end that takes in over 100 acres of our property by using parcel boundaries inside the city limits. Some of that land is a half-mile away from the identified plume. Except for the Bayer/Monsanto property to the north, it is the single largest block of land involved. The large overreach of the boundary along these parcel boundary lines does not fit the need, nor any added protection for public safety. It does impact the use of the land for development of housing projects--whether five acre ranchette parcels with wells, family homes on the land, or even future development for residential housing--all of which are in great demand and need in Soda Springs, and all of which impacts the ability to use the property in the future for development, as well as the value of it.

I don't like to complain without giving solutions. A rather simple and fair resolution is to not use the parcel boundary, but redraw the ADC boundary on the south to begin at the Edith P LLC property line on South Third East on what is called the Bailey Creek Road, go west to the meandering property line south of Big Springs (Clear Springs) to the "Smith" property on the west, then go southwest diagonally to the Bear River or include all of the "Smith" parcel in the ADC for convenience. This does include a small portion of the existing modelled map of the plume, but very little in an area where moly readings are low, along with the history of the plume receding back northward from cleanup efforts at the Kerr-McGee site.

A second alternative to the ADC boundary is to start at the corner parcel boundary on South Third East and draw a more-or-less straight and diagonal line along the edge of the plume to the "Smith" parcel and possibly to the Bear River or enclose that Smith parcel in whole if needed. Because the plume and moly readings decrease on the south side and southern end of the ADC, very little buffer, or any, would be required for public safety. This may require a survey, but in today's world, that is not a very large obstacle and can be defined in the future for any well drilling or development.

Continued on Page 2

The advantage of either of these modifications to the proposed ADC as drawn is it decreases the over-reach of the proposed design along parcel lines, which impacts directly the private property owner, and which may become a regulatory taking. It also provides public safety and the use of the over 100 acres for continued agriculture, or development of housing, or other development uses, which are greatly needed at this time. The cost to do this is not great, nor is it complicated. The change would lessen the acres and the consequential impact of broad-stroke parcel mapping.

Maps showing both ADC boundary changes are enclosed to help with identification and visuals.

The second part of our concerns is seen in the blue service area mapping of the City of Soda Springs water service that is provided to city residents. The argument has been made the city covers practically the entire city limits with good, safe drinking water through its spring water sources to the east and outside of any plume or anticipated contamination areas. That's the good news.

Again, the southern map of the ADC boundary shows the large area of nonservice inside the city limits, of which our homes and property described above is included. While we do not know what future contaminants from industrial operations on the north edge of the city, and potentially further north may be, even with the current successful remedial action on the Kerr-McGee site and the selenium at Bayer/Monsanto, it is likely water plume contamination from other on-site and new site issues will evolve, along with other locations that flow into the Blackfoot Basalt aquifer ground water that will impact this same area of flow in the years and decades to come.

By having city water services run to the south end of the city limits along Third East for new growth hook-ups and existing home hook-ups, all those public health concerns pretty much go away for human consumption issues, now and in the future. As trustee and defacto "industry responsible party," Greenfield Trust would act as the potential responsible party for that expense.

While talking about expenses, the trustee should also cover the additional permit requirements (i.e. engineering, design, etc.) and the actual costs of additional drilling expense in the ADC for having to seal, bond, drill deeper, and do mandated requirements for the domestic wells to drill and protect the Blackfoot Basalt aquifer and drill into the Salt Lake aquifer. A private property owner did not create this problem and should not be burdened with that which industry created and profited from.

There is also the issue of if an ADC water permit is mandated, that same mandate would likely allow non-issuance of permits by the agency for reasons of expanded plume, or more likely, the failure of the drilling requirements and procedures to protect the lower aquifer and allow contamination into it while drilling through the complex Blackfoot zone. There is some question about the feasibility of the specific drilling procedures to adequately seal the basalt aquifer. And then, would the private property owner be liable for that contamination if all specifications/requirements were followed.

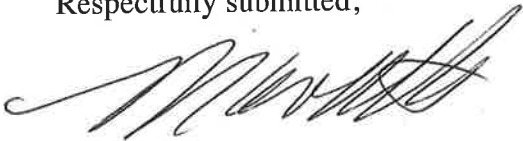
And, while we are talking drilling into the Salt Lake aquifer below the Blackfoot aquifer, it needs to be pointed out that for domestic consumption, we are going from excellent water for drinking purposes to "gawd-awful" drinking and domestic water that requires frequent well pump pulling and cleaning, filtration that is a royal pain, orange sinks and stains and the list goes on. That demarcation line of "bad

water" below the Blackfoot level is very much a concern to anyone having to drink from that source and another very good reason to limit the size and boundaries of the ADC that forces the well to be drilled to that deeper aquifer. That water aquifer becomes predominant just south of the city limits and runs east and west from there southward. My home at 780 South Third East is the last "aesthetically good water" I know of from there to the Bear River southward and that would include a couple of dozen county residences. My wife is a dowser and is quite familiar with that water table, as are those who have to drink it. You would not build a home in an area knowing you had to drink the iron-laden orange sulfur water of the Salt Lake aquifer if you had any other choices.

Thank you for allowing the property owners, interested parties, and me to give input at this early proposal stage of the ADC and giving us the ability to adjust the course of this important Superfund-related action involving state and federal agencies, the trust, current and past industries, and most importantly, the residents, who are and will be impacted regarding groundwater contamination, regulations, and remediation.

Enclosed are two maps showing boundary alternatives and a suggested city service water line. If you or others involved have any further questions or comments, feel free to contact me. Please notify me of your decision on the Soda Springs ADC as we move forward.

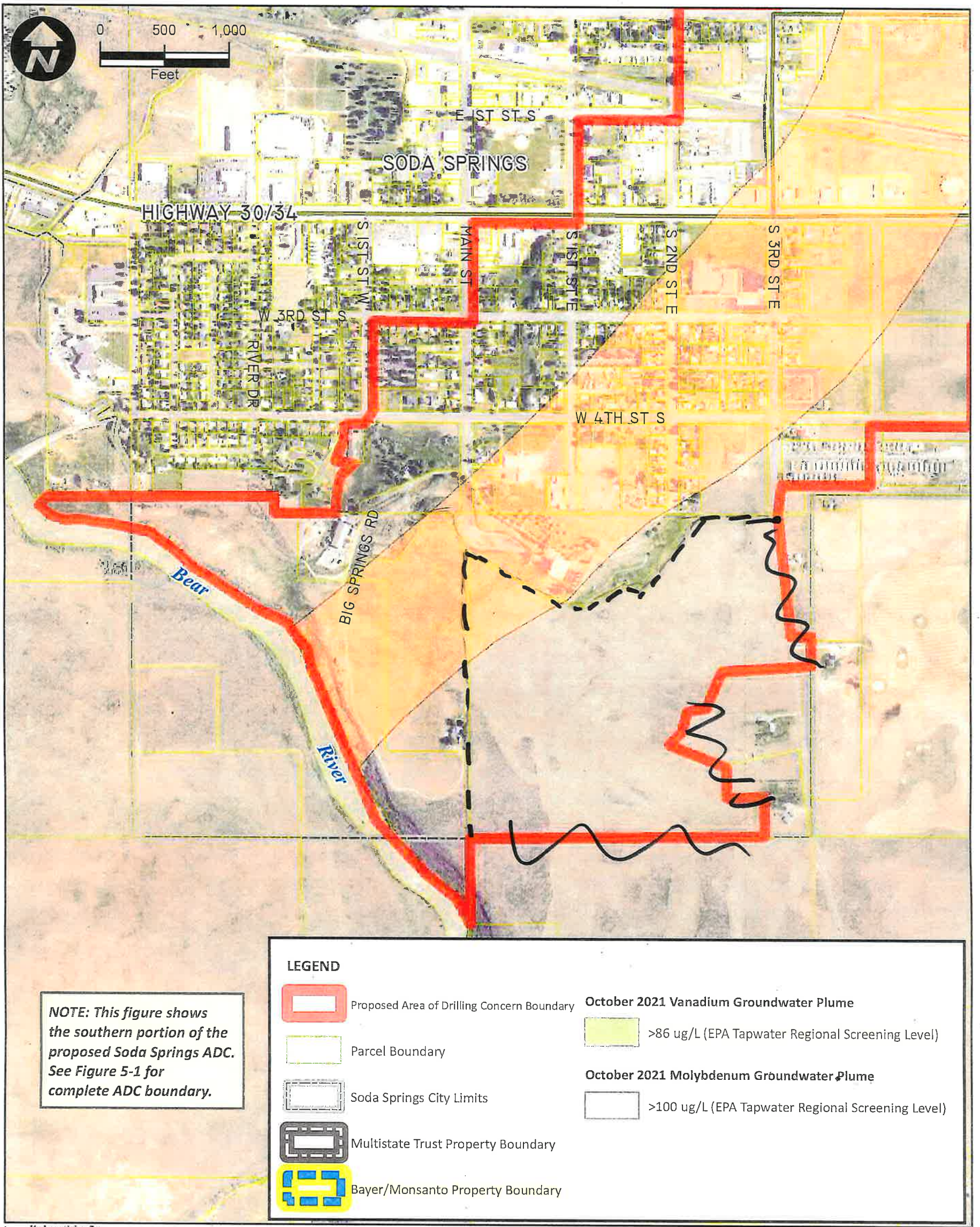
Respectfully submitted,


A handwritten signature in dark ink, appearing to read 'Mark Steele', with a stylized, cursive flourish at the end.

Mark Steele
PO Box 67 (780 South Third East)
Soda Springs, ID 83276

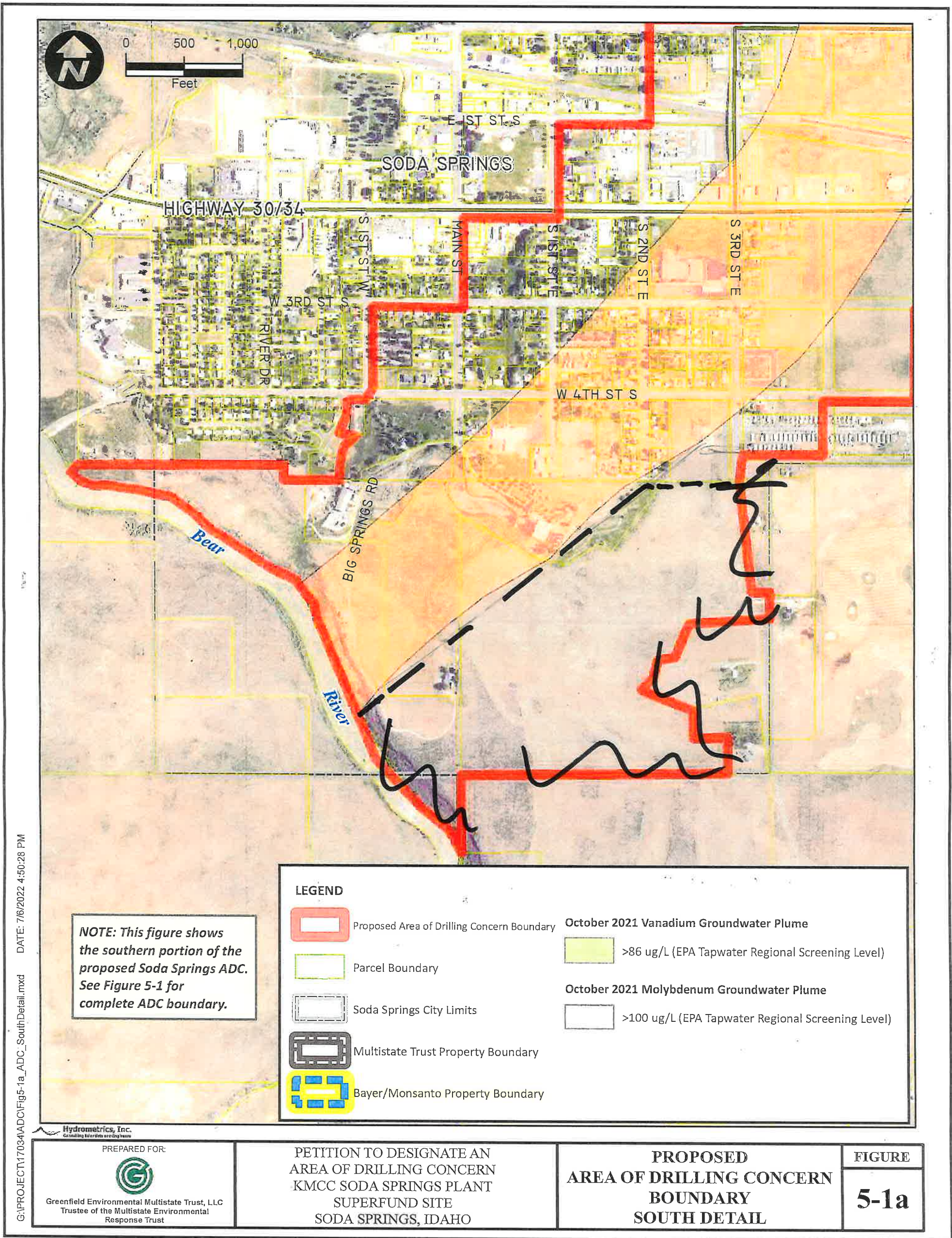
email: ccsun10@aol.com
work phone: 208-547-3260 (I'm in and out but you can leave a message. Email with a phone number or return email works well.)

G:\PROJECT\17034\ADC\Fig5-1a_ADC_SouthDetail.mxd DATE: 7/6/2022 4:50:28 PM

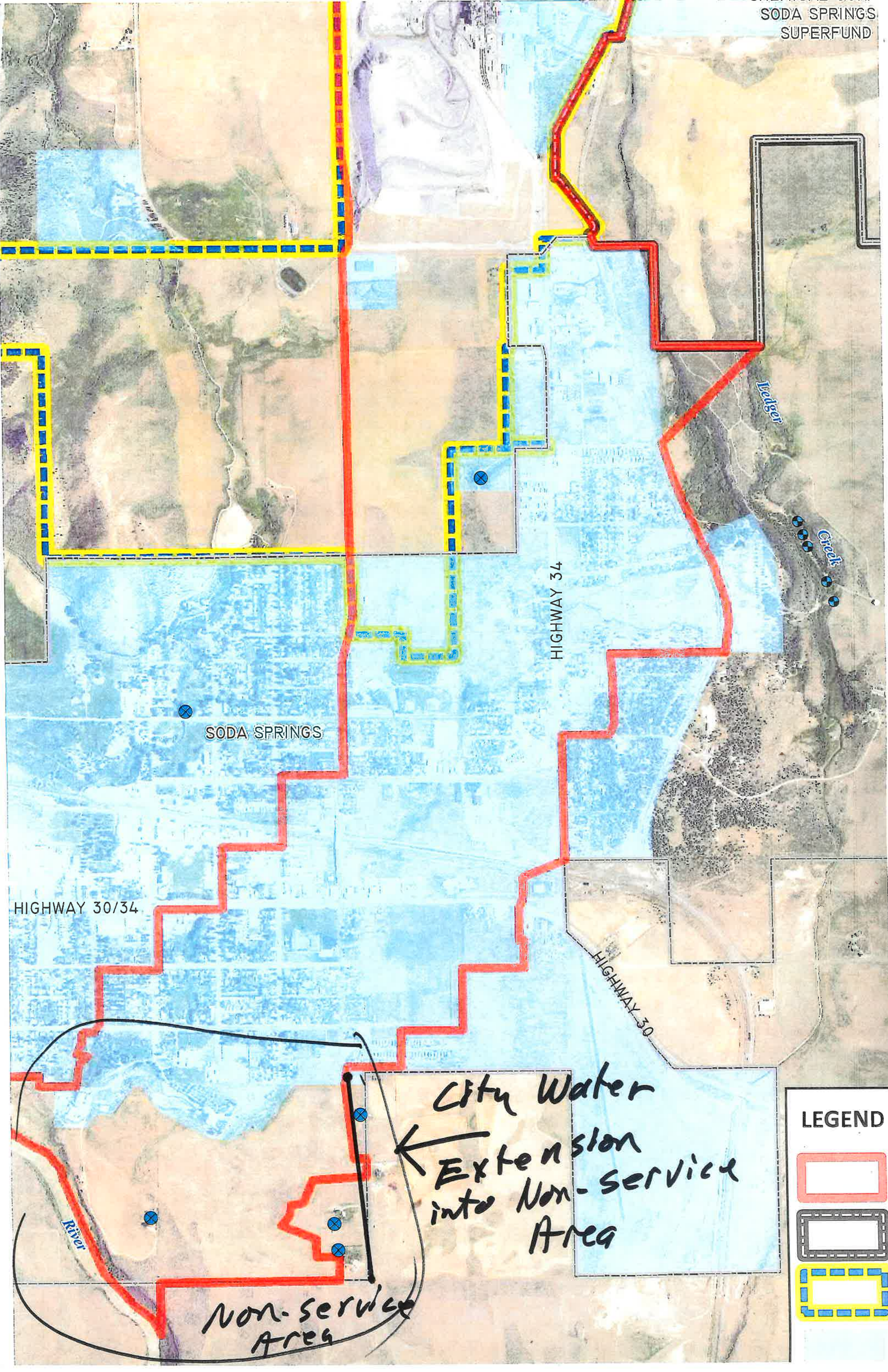


<p>Hydrometrics, Inc. GEOGRAPHIC INFORMATION SYSTEMS</p> <p>PREPARED FOR:</p> <p> Greenfield Environmental Multistate Trust, LLC Trustee of the Multistate Environmental Response Trust</p>	<p>PETITION TO DESIGNATE AN AREA OF DRILLING CONCERN KMCC SODA SPRINGS PLANT SUPERFUND SITE SODA SPRINGS, IDAHO</p>	<p>PROPOSED AREA OF DRILLING CONCERN BOUNDARY SOUTH DETAIL</p>	<p>FIGURE</p> <p>5-1a</p>
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Boundary Based on
Land Parcel



Boundary Based on Survey Line



SODA SPRINGS

HIGHWAY 34

HIGHWAY 30/34

HIGHWAY 30

LEGEND



City Water
Extension
into Non-Service
Area

Non-Service
Area