



**Yana Garcia**  
Secretary for  
Environmental Protection



## Department of Toxic Substances Control

Meredith Williams, Ph.D.  
Director  
8800 Cal Center Drive  
Sacramento, California 95826-3200



**Gavin Newsom**  
Governor

### SENT VIA ELECTRONIC MAIL

September 25, 2024

Noelle Breitenbach  
Statewide Trails Manager  
California Department of Parks and Recreation  
P.O. Box 942896  
Sacramento, CA 94296  
[trails@parks.ca.gov](mailto:trails@parks.ca.gov)

RE: NEGATIVE DECLARATION FOR PRAIRIE CITY STATE VEHICULAR  
RECREATION AREA PROPOSED ROAD AND TRAIL MANAGEMENT PLAN DATED  
AUGUST 28, 2024, STATE CLEARINGHOUSE NUMBER [2024081234](#)

Dear Noelle Breitenbach,

The Department of Toxic Substances Control (DTSC) received an Initial Study/Negative Declaration (IS/ND) for the Prairie City State Vehicular Recreation Area Proposed Road and Trail Management Plan (project). The California Department of Parks and Recreation (CDPR) has prepared an IS/ND for the Prairie City State Vehicle Recreation Area (Prairie City SVRA) Road and Trail Management Plan (RTMP). The Prairie City SVRA lies south of White Rock Road, between Sunrise Boulevard and Prairie City Road. The Prairie City SVRA RTMP provides a specific and detailed management direction for the off-highway vehicle (OHV) route systems within nine management areas in Prairie City SVRA, guiding their future development, operation and maintenance. Future development under the RTMP would design, construct, and maintain sustainable routes, trails, and related facilities for OHV use consistent with relevant guidelines and regulations. Nonmotorized trails for mountain biking and hiking

are also proposed in the RTMP. Management recommendations are provided to increase visitor safety and enjoyment, while protecting natural and cultural resources. The plan includes overarching recommendations to maintain the park's entire route and trail system, including new OHV and nonmotorized opportunities.

Figure 2-1 of the IS/ND shows the location of the proposed project, which extends within an area generally bound by White Rock Road to the north, Grant Line Road to the west, and undeveloped land to the south and east.

The Prairie City SVRA overlaps with and is adjacent to portions of the [Aerojet-General Corporation Superfund Site](#) (Aerojet Superfund Site) Operable Units (OUs) 5 and 7, which are undergoing active investigation and cleanup. The proposed project must not in any way introduce new contamination or spread or exacerbate existing contamination in soil and groundwater at the Aerojet Superfund Site. Any party that causes or exacerbates the contamination could potentially be held liable for the contamination.

#### **Aerojet-General Corporation Superfund Site**

The Aerojet Superfund Site is located south of Folsom Boulevard, generally north of White Rock Road and between Prairie City Road to the east and the Folsom Canal to the west. Aerojet Rocketdyne, Inc. (Aerojet) and its subsidiaries operated at the approximately 8,500-acre facility in Sacramento County from the 1950s; operations primarily included solid rocket motor manufacturing and testing, liquid rocket engine manufacturing and testing, and chemical manufacturing. These operations resulted in the release of hazardous substances/materials, including trichloroethene (TCE), perchlorate, and N-nitrosodimethylamine (NDMA), resulting in impacted soil, groundwater, and soil vapor. Sitewide preliminary characterization was completed in the 1990s, and additional investigation and cleanup activities have been undergoing at the facility since then under the oversight of the United States Environmental Protection Agency (USEPA) as lead agency, DTSC and California Central Valley Regional Water Quality Control Board (RWQCB) as supporting agencies. DTSC provides the following comments on the proposed project.

**Perimeter Groundwater Operable Unit 5, Zone 3**

1. The Prairie City SVRA overlaps with Zone 3 of the Perimeter Groundwater Operable Unit (PGOU), OU-5 of the Aerojet Superfund Site<sup>1</sup>. Groundwater monitoring, extraction, and treatment is conducted at PGOU to contain the groundwater contaminant plume and prevent the plume from spreading. Based on the most recent Aerojet Groundwater Monitoring Plan<sup>2</sup>, over forty Aerojet monitoring wells are actively sampled across the Prairie City SVRA as part of the PGOU remedy, along with nine active groundwater extraction wells. The protection of these wells is necessary to the success of the groundwater remedy. The IS/ND Section 3.8 notes the presence of these groundwater monitoring and extraction wells “owned/operated by Aerojet to capture and treat the groundwater in the southeast corner of the Prairie City SVRA”. However, the IS/ND does not mention what actions will be taken to protect the wellheads and groundwater remediation infrastructure or prevent access.

DTSC recommends the IS/ND include information about how interference with the groundwater remedy for the Aerojet Superfund Site will be avoided.

2. Institutional controls are also part of the PGOU groundwater remedy. A land use covenant (LUC) was recorded on a portion of PGOU Zone 3 property in 2012 that overlaps with the area identified in the RTMP as Prairie City SVRA Zone 6. The 2012 LUC is recorded with the Sacramento County Recorder, Book 20121126, Page 006<sup>3</sup>. The LUC includes environmental restrictions related to groundwater and requires written approval by the USEPA and RWQCB for

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<sup>1</sup> See Figure 2 of the 2021 Second Five-Year Review Report for Aerojet General Corporation Superfund Site, Sacramento County, California. September.  
[https://www.envirostor.dtsc.ca.gov/public/final\\_documents2?global\\_id=34370002&doc\\_id=60516005](https://www.envirostor.dtsc.ca.gov/public/final_documents2?global_id=34370002&doc_id=60516005)

<sup>2</sup> Geosyntec Consultants, Inc., 2024. 2024 Site-Wide Groundwater Monitoring Plan Update, Aerojet Superfund Site, Rancho Cordova, California. May 13.  
[https://documents.geotracker.waterboards.ca.gov/regulators/deliverable\\_documents/9303846061/2024%20Groundwater%20Monitoring%20Plan.pdf](https://documents.geotracker.waterboards.ca.gov/regulators/deliverable_documents/9303846061/2024%20Groundwater%20Monitoring%20Plan.pdf)

<sup>3</sup> Covenant to Restrict Use of Property, Environmental Restrictions on Groundwater at a Portion of the Perimeter Groundwater Operable Unit, Book 20121126, Page 006.  
[https://www.envirostor.dtsc.ca.gov/getfile?filename=/public%2Fdeliverable\\_documents%2F2212857902%2FAPNs%20072-3160-001\\_072-3160-002\\_072-3160-003\\_11\\_26\\_2012\\_LUC.pdf](https://www.envirostor.dtsc.ca.gov/getfile?filename=/public%2Fdeliverable_documents%2F2212857902%2FAPNs%20072-3160-001_072-3160-002_072-3160-003_11_26_2012_LUC.pdf)

certain developments and uses, including the development of permanent roadways and surface water drainage features, and installation of infrastructures, equipment, and/or facilities related to wells or pumping stations.

The IS/ND does not mention this LUC. The proposed plan must not violate any restrictions or requirements as described in this LUC.

3. DTSC appreciates that the IS/ND notes the Prairie City SVRA on-site “drinking fountains are currently non-operational due to concerns about possible water contamination.” Concentrations of Aerojet Superfund Site contaminants of concern (COCs) NDMA and perchlorate have exceeded the California State Water Resources Control Board Division of Drinking Water Notification Level and California Office of Environmental Health Hazard Assessment (OEHHA) Public Health Goal, respectively, in the on-site Water Supply Well (WSW) 1059. Based on detections in the water supply well, drinking water should not be sourced from this well. Aerojet has been providing bottled water to the Prairie City SVRA as a replacement for the drinking water since 2014 while working on long term options for water replacement.

***Island Operable Unit 7, Area 39***

4. Portions of Prairie City SVRA Management Zones 1, 2, 3, and 4 overlap with the 90-acre Area 39, a Management Area of the Island Operable Unit, OU-7 of the Aerojet Superfund Site. As described in Section 3.4.1 of the IS/ND, Area 39 was used by Aerojet between 1970 and 1972 as a burn area for chemical wastes. OU-7 is currently undergoing a Sampling and Analysis Plan Addendum for completion of the Remedial Investigation. Section 3.8.1 of the IS/ND describes goals and guidelines previously identified in the 2016 Prairie City SVRA General Plan<sup>4</sup> for protection from hazards, including potential hazards in Area 39. These include providing clear signage and/or fencing around these areas; providing Occupational Safety and Health Act

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<sup>4</sup> Final General Plan, Prairie City State Vehicular Recreation Area, September 2016.  
[https://www.parks.ca.gov/pages/21299/files/Prairie-City-Final-General-Plan\\_9\\_%202016.pdf](https://www.parks.ca.gov/pages/21299/files/Prairie-City-Final-General-Plan_9_%202016.pdf)

(OSHA) training for staff and utilizing OSHA-certified staff to oversee excavation within Area 39 in coordination with Aerojet; and incorporating information and recommendations for protection of human health and the environment from the Aerojet Feasibility Study for Area 39. In Section 3.9.1, page 3-77, first paragraph of the IS/ND it refers to this Feasibility Study as “expected to be completed in 2018” and in Section 3.3.2, page 3-30, fourth bullet from bottom of page, it states “having been completed in 2018”, however the IS/ND must be clarified that the Area 39 Feasibility Study was not completed in 2018 and has not yet been completed.

DTSC supports the protection of recreational users from potential current hazards in Area 39 via clear signage and fencing, maintained as needed, and following OSHA’s requirements for construction workers during excavation within the Superfund Site, including Hazardous Waste Operations and Emergency Response training.

Please note that Area 39 is still undergoing Remedial Investigation, and additional supplemental sampling will be needed prior to the preparation of the Feasibility Study for OU-7. Following the Feasibility Study, USEPA will issue the Record of Decision for a plan to clean up OU-7. DTSC supports the Prairie City SVRA management plan incorporating any future updated information or recommendations regarding Area 39 from the Feasibility Study, as well as cooperating with any mitigation and/or cleanup measures required for Area 39 once the Record of Decision is finalized.

DTSC appreciates the opportunity to comment on the Neg Dec for the Prairie City State Vehicular Recreation Area Proposed Road and Trail Management Plan. Thank you for your assistance in protecting California’s people and environment from the harmful effects of toxic substances. Should you have any questions or comments regarding this matter, please contact Susan Scudder at (916) 255-3601, or [Susan.Scudder@dtsc.ca.gov](mailto:Susan.Scudder@dtsc.ca.gov).

Noelle Breitenbach  
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Sincerely,

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