



Oregon

Tina Kotek, Governor

Department of Environmental Quality

Western Region

165 E. 7th Ave., Ste. 100

Eugene, OR 97401

(541) 686-7838

October 31, 2025

City of Talent
Attn: Jon Legarza
Talent Urban Renewal Agency
100 East Main Street
Talent, OR 97540

RE: **No Further Action Determination**
for Talent Urban Renewal Site (Gateway Housing Project)
LUST #15-18-1358

Dear Mr. Legarza:

The Oregon Department of Environmental Quality (DEQ) has completed a review of available information and environmental site assessment reports submitted by Alpine Environmental Consultants, LLC to DEQ on your behalf dated between 2016 and 2022. The Talent Urban Renewal Site is located at 102-104 South Pacific Highway, Talent, in Jackson County (Tax Map 381W23DC Tax Lots 2401, 2700 and 2800).

DEQ has determined that remedial action to address environmental contamination at the Talent Urban Renewal Site (the site) is complete, and no further action is required. This determination is a result of our evaluation and judgment based on the DEQ regulations and the facts as we now understand them including the following:

- The site is located southwest of the intersection of South Pacific Highway and West Valley View Road in Talent and is comprised of three tax lots covering 4.23 acres. The ground surface is flat and covered by asphalt. Surrounding properties are in light commercial and residential use.
- The site is currently used as transitional housing for short-term residences by the City of Talent's Urban Renewal Agency (TURA). As part of TURA's Gateway Housing Project, approximately 50 RVs were placed on the property, temporarily housing area residents who were displaced by the 2020 Alameda wildfire. Long-term plans for the property include development of permanent multi-use commercial structures and residential housing.
- Site assessments performed for the subject property in 2016 and 2018 identified past commercial land use potentially may have included the use of historical fuel underground storage tanks (USTs).
- Between 2017 and 2019, structures on the site were demolished and a geophysical survey was conducted. The survey identified two, previously unknown USTs (600-gallon and 1,000-gallon) located on tax lot 2700, near the northeast corner of the site and adjacent to the intersection of the South Pacific Highway and West Valley View Road rights-of-way (ROW).
- In November 2018, the two USTs were decommissioned by removal. During UST removal, petroleum-like impacts were observed in the subsurface and reported to DEQ and LUST incident number 15-18-1358 was assigned to the release and property. Approximately 253 tons of contaminated soil was excavated and taken to Dry Creek Landfill for disposal.

- Testing within the UST excavation identified gasoline and diesel-range contamination was present in soil and groundwater. Several gasoline and diesel constituents were also detected. DEQ risk-based concentrations (RBCs) for residential direct contact of soil, ingestion of drinking water and vapor intrusion into buildings were exceeded.
- A beneficial water use determination completed for the site reported the site and the surrounding properties are provided with municipal water and water supply wells were not present on the site or surrounding properties. Two domestic water wells were identified within a quarter mile radius of the site, with the nearest well located 0.20-miles crossgradient from the site.
- Additional sampling was completed in August 2020 and December 2021 to delineate soil and groundwater impacts to the north and northeast of the former USTs and to address the vapor intrusion pathway for future site users, respectively.
- Sampling results identified one exceedance of site-applicable RBCs in a groundwater sample near the former USTs and ROWs. Naphthalene was detected at 528 micrograms per liter (ug/l) in a temporary boring, exceeding the groundwater in an excavation RBC of 500 ug/l for construction and excavation workers. Detections in soil were below applicable RBCs, and no detections above laboratory reporting limits were found in soil gas samples collected near the former USTs for the vapor intrusion assessment.
- Based on depth to groundwater ranging between approximately 8 and 14 feet bgs and not likely encountered during general construction activities, decreasing trends of groundwater contamination away from the site and probable duration of exposure to contamination, it is unlikely that an unacceptable risk exists to future construction and excavation workers via the groundwater entering an excavation pathway.
- DEQ provided a 30-day opportunity to comment on the No Further Action determination during July and August 2025. DEQ sent letters to adjacent property owners, including the City of Talent and the Oregon Department of Transportation (ODOT). Only comments from ODOT were received, objecting to the proposed closure. DEQ responded in an email dated September 22, 2025, concluding that contamination from the release did not present an unacceptable risk to human health or the environment, and as such DEQ would be issuing this NFA. However, DEQ recognizes that portions of the ROW may have been impacted by the release and some remaining contamination may exist.
- The nearest surface water to the site is Wagner Creek, approximately 300 feet to the southeast of the site. Bear Creek is approximately 0.3-miles to the northeast of the site. Groundwater flow direction has been reported to the northeast, upgradient from Wagner Creek. As such, the site should not present a risk to the creek.

Based on available information, soil, groundwater and soil gas conditions associated with the LUST release at the Talen Urban Renewal site are currently protective of public health and the environment in accordance with Oregon Administrative Rules 340-122-0205 through 340-122-0360. The site requires no further action unless new or previously undisclosed information becomes available, or there are changes in site development or land and water uses, or more contamination is discovered. DEQ has updated the Leaking Underground Storage Tank (LUST) database to reflect this decision.

This letter only applies to the release as discussed above. If any contaminated media is encountered in the future, it must be handled and disposed of in accordance with local, state and federal regulations.

A copy of the site assessments reports supporting this No Further Action decision can be viewed at <https://ordeq.org/LUST15-18-1358>. DEQ recommends keeping a copy of all the documentation associated with this remedial action with the permanent facility records. If you have any questions, please contact Anthony Chavez at 541-687-7348, or via email at anthony.chavez@deq.oregon.gov.

Sincerely,

Brad Shultz

Brad Shultz, Manager
Western Region Environmental Cleanup

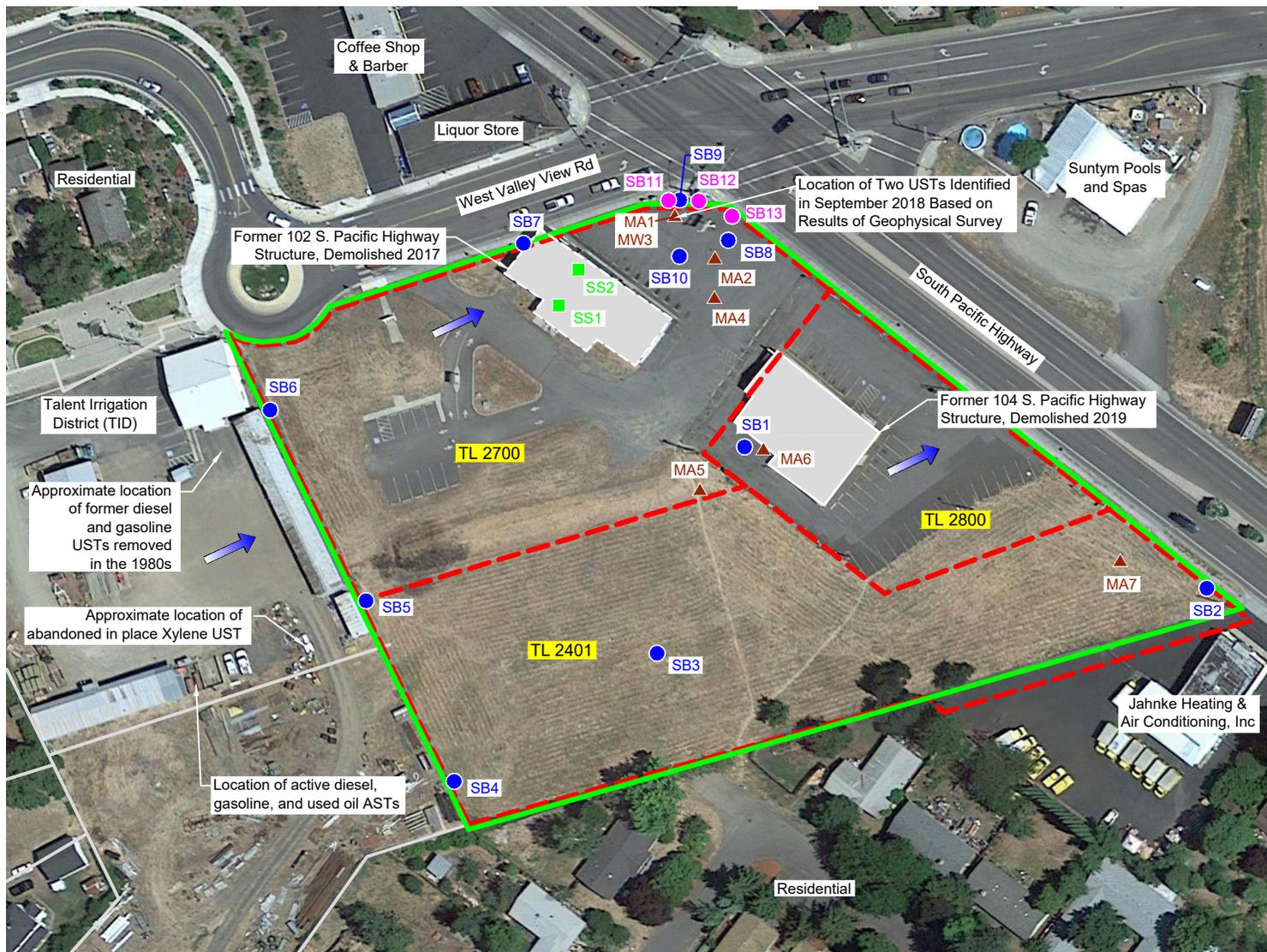
Attachment: Site Map

ec: ORMS LUST 15-18-1358
Don Hanson, RG – DEQ
Len Farr, RG – Stantec
Jonathan Williams, RG – Alpine Environmental Consultants, LLC

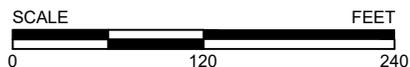


LEGEND

- Approximate Tax Lot Boundaries
- Approximate Boundary of Subsurface Mapping Survey
- Inferred Groundwater Flow Direction
- UST Underground Storage Tank
- AST Above Ground Storage Tank
- SB11 Soil Boring, August 2020
- SB1 Soil Boring, October 2018
- ▲ MA1 Magnetic Anomaly
- SS1 Soil Sample for Sumps



SOURCE: GOOGLE EARTH (2018)



ALPINE ENVIRONMENTAL CONSULTANTS, LLC

DATE: 2/18/21	DRAWN BY: SRM
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Figure 2
Site Map
Phase II Investigation and UST Decommissioning
102 and 104 South Pacific Highway
Talent, Oregon