



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

December 21, 2022

Sarah Million McCormick
Assistant City Manager City
of Fort Bragg
smccormick@fortbragg.com

GEORGIA-PACIFIC, FORT BRAGG MILL SITE, OPERABLE UNIT E
ENVIRONMENTAL IMPACT REPORT, FORT BRAGG, CALIFORNIA (SITE CODE:
202276)

Dear Ms. McCormick,

California Department of Toxic Substances Control (DTSC) is in the process of reviewing the Operable Unit E Remedial Action Plan (OU-E RAP) for the Georgia-Pacific Former Mill Site. As a Responsible Agency under the California Environmental Quality Act (CEQA), DTSC is providing input to assist in scoping the Environmental Impact Report (EIR) addressing the OU-E RAP. The City of Fort Bragg (City) is lead agency for the development of the EIR because the City has review and approval authority for the Coastal Development Permit (CDP), which is required for OU-E RAP implementation. DTSC will also rely on the City-certified EIR when considering approval of the RAP. Because of the dual purposes of the EIR, DTSC suggests that the EIR be scoped to analyze both the proposed RAP and CDP as these projects are inseparable.

The City determined that an EIR is required for the CDP because of potential unmitigable, significant impacts of the remedial action proposed in the OU-E RAP. The EIR would evaluate and consider the potentially significant impacts of the project (approval of a RAP and CDP) and then recommend alternatives to reduce or eliminate these impacts. The OU-E RAP, which DTSC would review and then approve or deny, would itself identify alternative remedial actions that were initially evaluated in the September 2019 OU-E Feasibility Study (FS). The EIR could use these alternative

Ms. Sarah McCormick
December 21, 2022
Page 2 of 3

remedial actions as part of its alternative analysis because DTSC would rely on the City-certified EIR while performing its discretionary action on OU-E RAP.

DTSC recommends the EIR use the alternatives found in Section 7: Development and Evaluation of Remedial Alternatives of the OU-E FS. At meetings with the California Coastal Commission (CCC), DTSC received clarification on policies regarding the armoring component of the preferred remedial action for Pond 8. Coastal Commission Staff indicated that alternatives to armoring must be considered prior to approval of the CDP and OU-E RAP. DTSC also received feedback from the City and from community members requesting additional remedial alternatives be included in the EIR. Therefore, DTSC also recommends that additional alternatives be considered in the EIR and include variations on the containment alternative, including a combination removal/containment alternative, along with on-site terrestrial consolidation of sediment, on-site terrestrial treatment of sediments, and partial removal of the Pond 8 dam and the western section of Pond 8.

DTSC looks forward to working with the City on the scoping and development of the EIR for the OU-E RAP and CDP. If you have any questions regarding this letter, please contact me at (510) 540-3776 or at Tom.Lanphar@dtsc.ca.gov.

Sincerely,



Thomas Lanphar
Senior Environmental Scientist
Site Mitigation and Restoration Program
Department of Toxic Substances Control



Kim Walsh, MPH
Unit Chief
Site Mitigation and Restoration Program
Department of Toxic Substances Control

cc: see next page

Ms. Sarah McCormick
December 21, 2022
Page 3 of 3

cc: (via email).

Mike Buck
Sierra Railroad
mikebuck@fucrumadvocates.com

Robert Pinoli
Mendocino Railway
rjpinoli@sierarailroad.com

Dave Massengill
Georgia-Pacific
DGMassen@GAPAC.com

Craig Hunt
NCRWQCB
Craig.Hunt@waterboards.ca.gov

Melissa Cramer
California Coastal Commission
Melissa.Kraemer@coastal.ca.gov

Jeremie Maehr
Kennedy Jenks
JeremieMaehr@kennedyjenks.com

