

From: [Bigelow, Morgan@DTSC](mailto:Bigelow,Morgan@DTSC)
To: [Jeremie Maehr](#); [Rachel Morgan](#); [Michael Buck](#)
Cc: [Walsh, Kimberly@DTSC](mailto:Walsh,Kimberly@DTSC); [Lion, Gabrielle](#)
Subject: OU-E Feasibility Study Addendum
Date: Tuesday, September 5, 2023 4:54:00 PM
Attachments: [image001.png](#)
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Dear Mr. Buck,

The Department of Toxic Substances Control (DTSC) has determined that the Operable Unit E Feasibility Study (OU-E FS) for the former Georgia-Pacific Mill Site requires additional alternatives analysis in a Feasibility Study Addendum (FS Addendum). Scoping exercises for the Operable Unit E Remedial Action Plan (OU-E RAP) and Coastal Development Permit (CDP) Environmental Impact Report (EIR) identified the need for the evaluation of alternatives not included in the OU-E FS.

Coastal Commission Staff have clarified that alternatives to armoring must be considered prior to approval of the CDP and therefore, the OU-E RAP. DTSC also received feedback from the City and from community members requesting additional remedial alternatives be included in the EIR to evaluate remedial alternatives that could avoid armoring, and other potential unmitigable significant environmental impacts.

Mendocino Railway is required to submit a complete Feasibility Study pursuant to Section 5.7 of the 2007 Order. Though DTSC approved the previously-submitted Feasibility Study, given the new information that has come to light, DTSC's previous approval is now only partial. Accordingly, Mendocino Railway is required to draft a FS Addendum that reevaluates the on-site terrestrial containment and on-site terrestrial treatment process options. DTSC also recommends that additional alternatives considered in the EIR and the OU-E FS Addendum include variations on the containment alternative such as hybrid alternatives that include removal/containment/treatment technologies. The potential for on-site terrestrial consolidation/treatment of sediments could affect the feasibility of the removal of the contaminated sediments from Ponds 1, 2, 3, 4, 6, 7, 8 and the North Pond. Please draft the set of alternatives that Mendocino Railway/Sierra Northern Railway will evaluate in the OU-E Feasibility Study Addendum due in 90 days, on December 4, 2023. Approval by DTSC of the OU-E FS Addendum is required before it can approve the OU-E RAP.

Sincerely,

Morgan Bigelow

Morgan Bigelow (*she/her/hers*)

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