



**Yana Garcia**  
Secretary for  
Environmental Protection



## Department of Toxic Substances Control

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**Gavin Newsom**  
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December 27, 2022

Mr. Mike Buck  
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GEORGIA-PACIFIC CORPORATION SITE, 90 WEST REDWOOD AVENUE, FORT BRAGG, CALIFORNIA, OPERABLE UNIT E FEASIBILITY STUDY ADDENDUM (SITE CODE:202276)

Dear Mr. Buck:

The Department of Toxic Substances Control (DTSC) has determined that the Operable Unit E Feasibility Study (OU-E FS) for the 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.

The City of Fort Bragg (City) is lead agency under the California Environmental Quality Act (CEQA) 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. As a Responsible Agency under CEQA, DTSC will rely on the City-certified EIR when considering approval of the RAP. 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 will evaluate and consider the potentially significant impacts of the project and then recommend alternatives to reduce or eliminate these impacts.

At meetings with the California Coastal Commission (CCC), DTSC received clarification on policies regarding the armoring component of the preferred remedial action for OU-E Pond 8. Coastal Commission Staff indicated that alternatives to armoring must be

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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.

When selecting a remedial alternative in the RAP, DTSC will rely on the alternative analysis of the OU-E Feasibility Study and the EIR. Because the EIR has been scoped to include remedial alternatives not found in the OU-E FS, the OU-E FS must be updated in an addendum. To ensure consistency, the development of the OU-E FS Addendum must be coordinated with the development of the alternatives in the EIR.

DTSC recommends that OU-E FS Addendum reevaluate the on-site terrestrial contaminant 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 contaminated sediments from Ponds 1, 2, 3, 4, 6, 7, 8, and the North Pond.

If you have any questions, please contact Kim Walsh at (510) 540-3773 or via email at [Kim.Walsh@dtsc.ca.gov](mailto:Kim.Walsh@dtsc.ca.gov).

Sincerely,



Thomas P. Lanphar  
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Department of Toxic Substances Control

cc: Mr. Craig Hunt  
North Coast Regional Water  
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