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Secretary for  
Environmental Protection



**Department of Toxic Substances Control**

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**Gavin Newsom**  
Governor

**SENT VIA ELECTRONIC MAIL**

December 24, 2024

John Smith  
Acting Community Development Director  
City of Fort Bragg  
416 N. Main St.  
Fort Bragg, CA 95437  
[jsmith@fortbragg.com](mailto:jsmith@fortbragg.com)

RE: INITIAL STUDY/MITIGATED NEGATIVE DECLARATION FOR THE  
WASTEWATER TREATMENT FACILITY BIO-SOLID STORAGE AND DRYER  
BUILDINGS & PV PROJECT DATED NOVEMBER 26, 2024, STATE  
CLEARINGHOUSE NUMBER [2024110968](#)

Dear John Smith,

The Department of Toxic Substances Control (DTSC) reviewed the Initial Study/Mitigated Negative Declaration (IS/MND) for the Wastewater Treatment Facility Bio-Solid Storage and Dryer Buildings & PV Project (Project). The proposed Project is a Coastal Development Permit and Design Review Permit for the construction of: 1) a new 800 square foot Bio-Solids Dryer Building which would be constructed in the same footprint as the existing Bio-Solids Dryer Building; 2) a new 5,000 square foot Bio-Solids Storage Building, which would be constructed on the concrete pad of the now decommissioned secondary biofilters; and 3) installation of a solar PV system which would consist of two modules of 6,250 and 10,850 square feet each. DTSC recommends and requests consideration of the following comments:

1. The IS/MND Hazards and Hazardous Materials section evaluated if the site is included on a list of hazardous materials sites compiled pursuant to California

Government Code Section 65962.5, commonly known as the Cortese List. Not all sites impacted by hazardous waste or hazardous substances are found on the Cortese List. DTSC recommends that the Hazards and Hazardous Materials section of the IS/MND address actions be taken for any sites impacted by hazardous waste or hazardous substances within the Project area or proximal to the Project area, not just those found on the Cortese List. There are several areas/sites which DTSC has regulatory oversight over that are within the proposed Project site. Some are listed as having documented contamination and land use restrictions. Therefore, DTSC recommends further coordination with the Department in the event that the proposed Project may impact any of the areas that may fall under DTSC's or other regulatory agency's oversight. Please review the Project area in [EnviroStor](#); DTSC's public-facing database and coordinate with the Department if any suspected decisions may impact these areas that DTSC oversees.

2. The City of Fort Bragg Coastal Trail (Coastal Trail) and the Georgia-Pacific Corporation (former Georgia-Pacific Mill Site) are both adjacent to the Project. The roadway leading to the wastewater treatment facility crosses Operable Unit -A (OU-A), which is now the [City of Fort Bragg Coastal Trail](#) and Operable Unit-D (OU-D) of the [former Georgia-Pacific Mill Site](#).

### **Site History**

Historically, the wastewater treatment plant, the OU-A City of Fort Bragg Coastal Trail, and the OU-D Planer #2 were part of the Union Lumber Company, which began sawmill operations at the site in 1885. Boise Cascade Lumber Company purchased the property in 1969 and sold it to Georgia-Pacific in 1973. Georgia-Pacific operated the lumber mill until August 8, 2002.

Prior to the plant closure, logs were received by truck, unloaded, and stored in the log storage areas. Logs were then removed from inventory, debarked, and milled. Milled lumber was then either shipped green, kiln dried, or air

dried on site. Finished lumber was transported by rail or flatbed trailers. Bark and wood refuse were transported by truck, conveyer, or pneumatic system to the power plant where they were burned to generate steam for electricity. Historically, the facility included sawmills, planer buildings, a fence plant, a power plant, lumber storage areas, and various maintenance facilities.

#### The City of Fort Bragg Coastal Trail (OU-A)

The 82-acre Coastal Trail site is located on the coastal bluffs of the City of Fort Bragg on the former Georgia-Pacific Mill Site. The Coastal Trail was identified as OU- A of the Georgia-Pacific Site. The Coastal Trail site is now a recreational park with four miles of multi-use trails, two parking lots, three restrooms and 25 acres of habitat restoration and other related improvements. Areas of Interest in OU-A included a scrap yard, clinker/ash scrap piles, and former railroad tracks. The overall Mill Site operations resulted in the following types of contamination within OU-A:

Polycyclic aromatic hydrocarbons (PAHs), total petroleum hydrocarbons (TPH); dioxins; polychlorinated biphenyls (PCBs), and heavy metals.

#### Former Georgia-Pacific Mill Site (OU-D)

OU-D was the location of Planer #2 (previously a Veneer Plant), the former shipping office and vehicle maintenance shop, the sawmill/sorter, scales, former log storage and sediment stockpile, log deck, airstrip, sheep barn, Cypress gate, a tree nursery, and a scrap metal area. The overall Mill Site operations resulted in the following types of contamination within OU-D:

Dioxin (as 2,3,7,8-TCDD TEQ), lead, petroleum, polychlorinated biphenyls (PCBs), and polynuclear aromatic hydrocarbons (PAHs).

3. There are land use covenants (LUC) for sections of [OU-A](#) and portions of [OU-D](#) that specify soil management protocols if there is ground disturbance.

The LUC for OU-A, section 4.02 Soil Management states:

- Activities at the Property that will disturb the soil at or below grade (e.g., excavation, grading, removal, trenching, filling, earth movement, mining,

or drilling for water, oil or gas) shall be conducted to prevent migration of soils or dust from the Property offsite.

- Any grading, excavation, trenching or backfilling shall be managed in accordance with all applicable provisions of state and federal law.

As a result, no improvements or expansion of the existing road crossing OU-A should occur. If improvements or expansion of the road is planned, a Soil Management Plan (SMP) needs to be provided to DTSC for review and approval for the management of hazardous substances on-site.

The LUC for OU-D Planer #2, Section 4.2 Soil Management states:

- No activity at the Soil Restricted Area and Soil Vapor Restricted Area that will disturb the soil at or below grade (e.g., excavation, grading, removal, trenching, filling, earth movement, mining, or drilling) shall be allowed without a SMP pre-approved by the Department in writing.
- Any soil from the Soil Restricted Area and Soil Vapor Restricted Area brought to the surface by grading, excavation, trenching or backfilling shall be managed in accordance with all applicable provisions of state and federal law.
- Soil from the Soil Restricted Area and Soil Vapor Restricted Area containing hazardous substances above levels acceptable for unrestricted use must remain within the Soil Restricted Area and Soil Vapor Restricted Area boundaries, unless removed after receiving the prior written approval of the Department to a location authorized to accept the hazardous substance(s), hazardous material(s), or hazardous waste(s).
- No activity shall be allowed that may alter, interfere with, or otherwise affect the integrity or effectiveness of, or the access to, any investigative, remedial, monitoring, operation or maintenance system or activity (including all groundwater monitoring wells depicted in Exhibit C, and any Vapor Intrusion Mitigation System required by the Department), required for either of the Restricted Areas without prior written approval of the Department.

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The IS/MND does not indicate that the Project Activities would impact OU-D Planer #2, which is fenced off. Nonetheless, because of the site's proximity to the Project, DTSC requests acknowledgement of the known site contamination and land use covenant.

DTSC appreciates the opportunity to comment on the IS/MND for the Wastewater Treatment Facility Bio-Solid Storage and Dryer Buildings & PV Project. Thank you for your assistance in protecting California's people and environment from the harmful effects of toxic substances. If you have any questions or would like clarification on DTSC's comments, please respond to this letter or via [email](#) for additional guidance.

Sincerely,

*Tamara Purvis*

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