Narrative Information Sheet – Wild Rivers Land Trust (WRLT)

1. Applicant Identification:
    a. Wild Rivers Land Trust
    PO Box 1158
    Port Orford, OR 97465

2. Funding Requested:
    a. Grant Type: Single Site Cleanup
        b. Federal Funds Requested: $1,940,000
3. Location:
    a. Curry County
    b. State of Oregon

4. Property Information:
    a. 93639 Elk River Road (Address for Taxlot #900, other two have no address)
    Curry, County OR 97465
    Township 32 South, Range 15 West, Section 27
    Tax Lots #900, #104 and #901

5. Contacts:
    a. Project Director:
    Scott Fogarty
    Phone: 503.841.2134
    Email: scott@wildriverslandtrust.org
    Mailing address: PO Box 1158, Port Orford OR 97465

    b. WRLT Board President:
    Jan Hodder
    Phone: 541.291.0664
    Email: jhodder111@gmail.com
    Mailing Address: PO Box 5389, Charleston, OR 97420

6. Population:
    a. Port Orford, OR (1.5 miles away)
    Population 1,155 (2020 Census Estimate)

7. Other Factors Checklist:

Other Factors	Page #
Community population is 10,000 or less.	1
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	
The priority brownfield site is impacted by mine-scarred land.	
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the project/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation.	
The priority site is adjacent to a body of water (i.e. the border or the site is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	2
The proposed site is in a federally designated floodplain.	
The reuse of the proposed cleanup site will facilitate renewable energy from wind, solar, or geothermal energy.	
The reuse of the proposed cleanup site will incorporate energy efficiency measures.	
The reuse strategy or project reuse of the proposed site considers climate adaptation and/or mitigation measures.	3
The target area is located within a community in which a coal-fired power plant has recently closed (2012 or later) or is closing.	

8. Letter from the State or Tribal Environmental Authority:
    a. Attached

9. Releasing Copies of Applications:
    a. Not applicable

Oregon
Kate Brown, Governor

Department of Environmental Quality
Western Region Eugene Office
165 East 7th Avenue, Suite 100
Eugene, OR 97401
(541) 686-7838
FAX (541) 686-7551
TTY 711

November 15, 2022

Terri Griffith
U.S. Environmental Protection Agency,
Region 10 1200 Sixth Avenue, Suite 155
Mailstop: ECL-133
Seattle, WA 98101

RE: FY2023 EPA Cleanup Grant Application for Wild River Land Trust – Bagley Creek Log Pond

Dear Terri:

The Oregon Department of Environmental Quality is pleased to acknowledge the Cleanup Grant Application from Wild River Land Trust (WRLT). The Wild River Land Trust - Bagley Creek Log Pond project is eligible and is currently enrolled in the state voluntary response program (ECSI # 556). DEQ has determined that sufficient site characterization of environmental conditions has been performed and a draft Analysis of Brownfields Cleanup Alternatives is complete. The site is ready for remediation work to begin.

Bagley Creek flows into Elk River, which provides essential habitat for anadromous fish such as Coho Salmon. The WRLT has an opportunity to restore a portion of Bagley Creek that was used for fire and log ponds for the former Western States Plywood Mill site in Curry County. Previous investigations, including a 2019 EPA-funded Targeted Brownfield Assessment, found that high concentrations of dioxin associated with the former mill operations are negatively impacting sediment and soil in and near Bagley Creek. As part of habitat restoration, WRLT will remove the fish passage barriers associated with the former mill and provide over a mile of spawning habitat for anadromous fish. Prior to doing so, the sediment and soil in the log pond and associated fish barrier berm require cleanup to ensure that site conditions are protective of wildlife.

Under a 99-year lease agreement with Elk River Partners, LLC, WRLT will conduct cleanup of the site. The EPA Brownfield Cleanup grant will improve, protect, and restore wildlife habitat by removing and properly disposing of contaminated soil and sediment in a salmon-bearing stream.

DEQ recognizes the value in restoring habitat to protective and productive ecological use. Therefore, DEQ encourages EPA to fund the WRLT Bagley Creek Log Pond Cleanup Grant application. Please contact Mary Camarata, DEQ Western Region Brownfields Coordinator at mary.camarata@deq.oregon.gov, 541-687-7435 if you have any questions.

Sincerely,

Michael E. Kucinski, Manager
Western Region Cleanup and Emergency Response

ec: Scott Fogarty and Max Beeken, WRLT, scott@wildriverslandtrust.org; max@wildriverslandtrust.org
Margaret Olson, EPA, olson.margaret@epa.gov
Rebecca Wells-Albers, HQ Brownfields Coordinator, rebecca.wells-albers@deq.oregon.gov

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITILIZATION

a. Target Area and Brownfield

i. Background and Description of Target Area

Wild Rivers Land Trust (WRLT), a 22 year old non-profit whose mission is to protect the lands and waters of the southern Oregon coast, is applying for a cleanup grant to address the remediation of the Western States Plywood Cooperative Mill (Site), which is adjacent to the Elk River - one of Oregon's Wild and Scenic Rivers and less than three miles from the Pacific Ocean. The City of Port Orford (Port Orford; pop. 1,155), less than two miles from the Site, is the oldest coastal community in Oregon, and is located 75 miles north of the California border within Curry County. It is the ancestral home to the Tututni Native American people, who are the original inhabitants on the southern Oregon coast, and who first came into contact with Europeans when Spanish, British, and American ships explored the coast in the 1700s. In the 1850s, settlers began building and Port Orford was formally founded in 1856 and incorporated in 1935. It would then serve as a port for mercantile and fishing.

The first Port District was formed in 1911 and the town became a shipping port for local Port Orford cedar, a high-quality timber that only grows in southwest Oregon and northwest California. Construction of a dock began in 1919; a breakwater was later built in 1971 in an attempt to protect the dock from winter storms. A unique aspect of the Port of Port Orford is the fact that there is no ocean bar to cross which results in more fishable days per year compared to other nearby ports. Ocean access is gained by use of one of the Port's hoists, which can lift boats weighing up to 25,000 pounds. Since the Port is situated on the open ocean, moorage in the water is only possible for short periods during calmer weather. The Port is critical to the local fishing economy as it transitions from reliance on timber extraction to a fishing and outdoor tourism economy.

Port Orford is an oceanside community surrounded by valuable and stunning natural resources and wildlife habitat including the Elk River (1.3 miles northeast of Port Orford); Redfish Rocks Marine Reserve (2.7 square miles) and Marine Protected Area (5 square miles), which is in the Pacific Ocean approximately 2.75 miles south of Port Orford. The Elk River is a national Wild and Scenic River which draws visitors from all over the world due to its natural beauty and world-class fishing opportunities, although fishing has been restricted in recent years due to declining fish populations. Two wilderness areas have been established in the watershed, the Copper Salmon Wilderness and Grassy Knob Wilderness, which protect approximately 30,000 acres of old growth forest within the Rogue-Siskiyou National Forest. When flying over the area in an airplane, the Elk River stands out as an island of green, healthy forest in a sea of cut-over private industrial timberland. These protections are a result of decades of community-led conservation efforts which continue to this day.

The remoteness of Port Orford, its small population size, and its high poverty rate of 31.9%, has made it very challenging to address brownfields in the community. The median household income for Port Orford is less than $25,000; less than half the national average. The importance of protecting Port Orford's natural resources grows with its growing tourism economy. Without additional financial support to cleanup brownfields, it is nearly impossible to stop the impacts from historic contamination from threatening the natural resources that surround the community and that provide valuable income streams through fishing and tourism industries.

WRLT is applying for a Brownfields Cleanup Grant to clean up the Site, a long-abandoned timber mill that has been impacting the environment for over four decades and continues to threaten natural resources and critical wildlife habitat in the Elk River. The Site is listed on the Oregon Department of Environmental Quality (DEQ) Brownfields list. The opening of the mill doubled the population of Port Orford in a time when big timber companies such as Georgia Pacific and Weyerhaeuser, Inc., dominated the landscape. The uniqueness of the co-operative company, meaning the mill workers held shares in the company, helped build and grow the local economy and community. A former employee of the mill stated that when WSPC closed in 1975,

after about 24 years of operation, it was a "very sad occurrence for me and the 200 families the mill supported in Port Orford".

i. Description of the Proposed Brownfield Site(s)

The 17-acre Site is located in section 27 of township 32 south, range 15 west of the Willamette Meridian and includes Curry County tax lots 104, 900, and 901. Prior to construction of the mill, the Site was used as pasture by a local ranching family. The land has been largely vacant since a fire destroyed the mill in 1976 and is covered with vegetation and disturbed ground from former mill operations. After closure, the Site was divided into five parcels and sold to private individuals. In an effort to protect the land from development, three of the parcels were bought by Elk River Partners LLC (ERP) who then entered into a 99-year lease with WRLT for management of the site with an option to acquire the Site in the future. ERP was formed in 2018 specifically to acquire properties in the Elk River watershed to support of salmon recovery efforts. The remaining two properties are currently open space as undeveloped land and are owned by a neighbor who has no plans to develop or change the use of the properties.

The site was added to the DEQ database due to reports of a glue spill in 1972. The contamination present at the Site is the result of normal plywood mill operations and, potentially in part due to the mill allowing employees to burn household refuse in the large industrial burners. Initially, Phase I Environmental Site Assessments (ESAs) were performed on tax lots 900 and 901. Phase II ESAs were later completed for tax lots 104 and 901 during November 2018. Hydrocarbons, metals, and formaldehyde, were identified across the two tax lots, and in January 2019, additional testing was completed in shallow soil for dioxin and furans. In December 2020, EPA delivered a Targeted Brownfields Assessment to WRLT further characterizing the site. In November 2022, a Phase I ESA was completed on tax lots 104, 901 and 900. Contaminants posing unacceptable risks to human health are dioxins and furans present in soil, sediments, and surface water.

Most of the Site is relatively flat at an elevation of approximately 80 feet above sea level. The eastern portion of tax lot 104 contains a slight topographic slope to Elk River. The Site is bordered by agricultural land to the west and north, rural residences to the east, and by Elk River Road (CR 208) to the south, which runs through the rural countryside and along the Elk River. Two ponds are present on the Site that were constructed as part of the former mill operations and are intersected by Bagley Creek, a tributary of the Elk River: the former log pond and the former fire suppression pond. Bagley Creek crosses the Site in a southwest-to northeast direction, through the former fire suppression pond and former log pond and enters the Elk River near the northeast corner of the Site. These ponds were created by building an earthen dike on the southern end of the log pond, and by construction of a concrete spillway between the two ponds. These impoundment structures blocked fish from passing above the ponds, eliminating access to over 1 mile of spawning beds upstream from the Site and are one of the last two remaining fish passage barriers in the entire Elk River watershed.

a. Revitalization of the Target Area

i. Reuse Strategy and Alignment with Revitalization Plans

The reuse strategy for the Site is to clean up the contamination, restore the land and waterways and protect the property for future generations. A major goal of this project is to restore fish passage to Bagley Creek. This project is part of a larger effort to restore habitat for Coho salmon in this region, which are listed as threatened under the federal Endangered Species Act. The reason for removing barriers to salmon is that eggs are laid in clear, cold streams, the salmon then swim out to the ocean where they live for 1-2 years and then return to the stream where they were hatched to spawn and continue the cycle. When barriers are present, salmon are unable to spawn and thus unable to reproduce. Cleaning up the legacy contamination at the Site will finally allow this ecological restoration to take place.

The National Oceanic and Atmosphere Administration's (NOAA) Final Recovery Plan Strategy for the Southern Oregon/Northern California Coast Evolutionarily Significant Unit of Coho Salmon and Strategic Action Plan for Coho Salmon Recovery have identified Bagley Creek as a priority location for restoration and protection of Coho salmon habitat, and identified the Elk River Coho salmon population as a core population for recovery. Both the Elk River and Bagley Creek have been designated as essential habitat by the Oregon Department of State Lands (DSL). The Site is part of the Sixes River-Elk River Conservation Opportunity Area (COA) identified in the Oregon's statewide fish and wildlife conservation plan, The Oregon Conservation Strategy. COAs are places prioritized for investment in fish and wildlife conservation goals and take into account the expected impact of climate change.

ii. Outcomes and Benefits of Reuse Strategy

This property contains one of the last two major fish passage barriers in the entire Elk River watershed. There is over 1 mile of spawning habitat above the current fish passage barriers that would become available to salmon after removal of the barrier. The availability of salmon habitat off the main stem of the river that provide resting places for overwintering Coho is also a limiting factor to populations and restoration of the property will provide that habitat as well. The site is considered a "sensitive environment", as defined in OAR 340-122-115(50), which designates "areas that of particular environmental value where a hazardous substance could pose a greater threat than in other, non-sensitive areas". Site cleanup will establish the path for restoration and recovery of this sensitive environment for the return of the Coho salmon. Prior to the Site being developed, and the fish passage being blocked, Salmon stocks in the Elk River were double what they are today. Climate change, habitat removal and degradation, sedimentation and changes in hydrology from timber harvesting practices, over fishing, creek barriers have nearly decimated the stocks of salmon on the West coast.

The economic impact of salmon fishing in the Elk River to the community of Port Orford and Curry County is direct and valuable. The public spends a considerable amount of money fishing on the Elk River, which in turn puts local residents to work. A 2008 study found that spending on travel related to fishing, hunting and wildlife viewing contributed over $20 million to the Curry County economy. Unfortunately, due to Coho salmon decline in recent years, the fishing activity on Elk River has dropped precipitously. Increased return of Coho will help to re-establish the recreational Coho fishery and the economic benefits it once generated. Additionally, jobs in ecological restoration have become an important part of our small, rural economy. A University of Oregon (UO) study found that restoration investment in Coos and Curry County between 2001-2010 supported an average of 73 local jobs per year. In addition, the UO study found that restoration investments have resulted in more than $32 million in economic output on the South Coast of Oregon.

This project is a unique private/ public partnership with the goal of restoring and protecting critical salmon habitat. It is a prime example of private citizens investing in restoration in partnership with state and federal agencies and nonprofit organizations for the recovery of native salmon species. If successful, this partnership has the potential to set a precedent and open doors to similar future endeavors, further advancing restoration efforts in our region. WRLT has been working with three of the nine federally recognized tribes in the region that have prioritized return of salmonid habitats. Along with the Coquille Indian Tribe, Confederated Tribes of Coos, Lower Umpqua and Siuslaw Indians and the Confederated Tribes of Siletz Indians WRLT aims to help restore the ecosystems that these tribes depend on and have cared for since time immemorial and return land to traditional indigenous interests. Salmon are extremely important to the tribes of this region. All of these tribes have invested heavily in efforts to recover salmon populations.

c. Strategy for Leveraging Resources

i. Resources Needed for Site Characterization;

The site characterization is sufficient for remediation to continue.

ii. Resources Needed for Site Remediation

No additional resources are needed for Site Remediation.

iii. Resources Needed for Site Reuse

While WRLT has limited resources as a small non-profit, we work closely with our local, regional, state and federal partners who bring added expertise, capacity and funding to the table. One of our closest partners on this project is the Curry Watersheds Partnership (CWP), which is taking the lead on the ecological restoration of the property and has applied for several grants to support those efforts. CWP has completed conceptual restoration designs for the Site and continues to advise on how the cleanup plans and the restoration plans can complement each other. To date, CWP has secured $48,000 from ODFW and Wild Rivers Coast Alliance to cover the next phase of restoration designs. In addition, WRLT has been working very closely with DEQ for the past several years and DEQ has indicated that it may be able to provide the necessary funding to complete the confirmation sampling as delineated in the ABCA prior to June, 2023. Lastly, CWP has applied for numerous grants (approximately $550,000) to pay for various activities including restoration, implementation, revegetation, invasive species management and habitat restoration. All funding sources have multi-year timeframes to access and utilize.

iv. Use of Existing Infrastructure

The Site is directly adjacent to Elk River Road (CR208), a paved two lane rural road that runs along the Elk River. The intersection of Elk River Road and Highway 101, the main north-south route that runs along the entire Oregon coast and connects to many east-west highways which lead to the interior of the state, is 2.4 miles from the site. No new infrastructure is needed for the reuse of the site. The project will utilize the natural resources on site as well as Elk River Road and the existing gravel roads on the site for access without impacting adjacent land. The entrance to the property from Elk River Road is gated and locked and will be kept closed to the public during construction.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

a. Community Need

i. Community's Need for Funding

Port Orford, is a small oceanside city with a poverty rate of 31.9% (more than twice as high as Curry County as a whole, and almost triple the US rate in the most recent census data. This elevated poverty rate equates to decreased income tax revenues as Oregon has no sales tax at state, county or town levels to generate revenue. The housing market, unlike the rest of the nation, is not competitive and median sold home prices are $338,000 as of October 2022. Further compounding its need is its recovery from COVID-19, which continues slowly for this population of 1,155 residents. After addressing its critical services and functions, Port Orford has no remaining budget for environmental cleanup; however, WRLT and others have been and continue to move forward with addressing the mill's remediation and realize that this proposed EPA grant is critical to its implementation. Additionally, other statistics highlight the community's need for funding including only 30% (225) of the residents are employed, which represents a 11.8% decline when compared to the previous year. The median age is 63 years and the median household income is $24,348 These statistics demonstrate how Port Orford is comprised of an aging and mostly low-income population and does not have the means to address the necessary cleanup.

In the 1970s, Port Orford's population was 2,300 thanks in part to the co-op mill. Due to lumber pricing wars with bigger mills, its doors closed in 1975 and population numbers began to drop off dramatically back to their 1950s numbers of 700 (a 68% decrease). While population numbers have been generally stable over the past seven decades, the differences in makeup reflect changing demographics and a shift that is becoming more pronounced over time: a change from a natural resource-based economy to a retirement and service economy. These changes in demographics as well as the low-income population limit the capacity of what the local entities can do to clean up Brownfields. This grant would not only provide the necessary funding to clean up the Site and facilitate the return of healthy salmon fisheries, but also provide a much needed stimulus to the local economy by strengthening recreational tourism related to salmon.

ii. Threats to Sensitive Populations

The EJScreen tool identifies Port Orford and the surrounding area as disadvantaged (Justice 40; CEJST) in two categories: vulnerability to and impact of the negative effects of climate change, as well as having a high rate of community health burdens. Port Orford is in the 81st percentile for low income (less than or equal to twice the federal poverty level) and 97th percentile for non-enrollment in higher education for ages 15 and older. Port Orford is also listed at the 91st percentile for expected economic loss rate to building value resulting from natural hazards each year. Port Orford also struggles with developing and retaining a workforce when compared to the rest of the US. Port Orford is in the 89th percentile of locations with a low median income level and in the 98th percentile for unemployment rates.

(1) Health or Welfare of Sensitive Populations

Port Orford has a high percentage of population over age 64. It falls within the 93 percentile when compared to the rest of the US. With a small population almost 40% of the people in Port Orford are over the age of 64. This represents a significant concern as the number of people in the workforce is very low, thus impacting the economy (reflected by the median household income of less than $25,000). The unemployment rate of Curry County falls within the 97th percentile rate for Oregon.

(2) Greater Than Normal Incidences of Diseases and Adverse Health Conditions

Port Orford has a community that is struggling with several health problems: falls within the 86th percentile for rates of diabetes, 97th percentile for occurrence of heart disease, and 82nd percentile for asthma occurrence.

(3) Promoting Environmental Justice

According to the USEPA Environmental Justice Screening Tool (CEJST), the community is identified as disadvantaged. More than 60% of residents fall below the poverty line, the community is medically underserved with the nearest hospital over 40 miles away and is considered a food desert. The proposed cleanup and reuse of the Site will have a substantial positive environmental, health and economic impact on the short and long-term welfare of the community.

b. Community Engagement - (i) Project Involvement and (ii) Project Roles

Organization/ Entity/Group	**Point of Contact**	**Specific involvement in the project or assistance provided**
Elk River Partners, LLC	Ted Labbe, 503.758.9562 ted.labbe@gmail.com	Landowner
Business Oregon	Karen Homolac, 971.239.9951 Karen.homolac@biz.oregon.gov	Funding
OR Department of Environmental Quality	Mary Camarata, 541.687.7435 mary.camarata@deq.oregon.gov	Regulatory oversight, technical assistance and state coordination
Curry Watershed Partnership	Miranda Gray, 541.373.3127 miranda.gray@currywatersheds.org	Lead on ecological restoration, assistance with outreach
Wild Rivers Coast Alliance	Marie Simonds, 541.404.8992 msimonds@wildriverscoastalliance.com	Funding and community outreach and education
Wild Salmon Center	Mark Trenholm, 971.255.5542 mtrenholm@wildsalmoncenter.org	Funding partner
Mike Rosen	Mike Rosen, 503.309.9894 michaelrosen503@gmail.com	Consultant on remediation and community input
Roger Brown	Roger Brown, 503.312.8636 rogerb@hahnenv.com	Consultant on remediation and community input
Center for Creative Land Recycling (CCLR)	Joelle Greenland, 720.541.0527 joelle.greenland@cclr.org	Brownfields technical assistance
Oregon Department of Fish and Wildlife	Steve Mazur, 541.247.7605 steve.j.mazur@odfw.oregon.gov	Consultation on restoration and fish passage activities
Swanson Ecological Services	Matt Swanson, 541.373.0800 matt.swanson@currywatersheds.org	Restoration planning and implementation

ii. Incorporating Community Input

WRLT has and will continue to seek community input at future scheduled public meetings. WRLT plans to host annual community meetings on the progress of the cleanup. Additionally, WRLT will describe cleanup updates on our website and in our community newsletters. We will also share progress and seek input from regional partners and with tribal entities. We will create a Public Involvement Plan (PIP) that outlines the timeline, type of cleanup, funding sources and community partners. These meetings will allow us to respond in a timely fashion to any inquiries in a fully transparent manner.

3. TASK DESCRIPTIONS, COST ESTIMATES AND MEASURING PROGRESS

a. Proposed Cleanup Plan: From 2016 through 2022, several studies investigating contamination at the site were performed. Dioxins and furans were found in the sediment, soil and surface water on the site. In November 2022, a draft ABCA was prepared to address the cleanup of approximately 6,800 cubic yards of soil and sediment contaminated by dioxins and furans at the site. The preferred cleanup alternative selected includes excavation and capping of soil and sediments. Soil and sediment that exceeds risk-based concentrations, but that does not exceed hot spot criteria (estimated to be 40% of all excavated material) would be excavated, placed upland and capped with a high visibility geotextile and at least two feet of other soil/sediment from the Site that does not exceed risk based concentrations. Excavated soil and sediment that exceeds hot spot criteria (estimated to be 10% of soil/sediment exceeding risk-based concentrations) would be disposed of offsite as nonhazardous waste in a permitted Subtitle D landfill. A 6-inch-thick residuals cover would be placed over excavated areas to stabilize the post-excavation surface and provide suitable habitat substrate. The residuals cover and all disturbed areas would be planted with native plants; planted areas would be maintained for three years.

WRLT will contract with qualified contractors and qualified environmental professionals (QEP) to complete the cleanup and the required plans and assist with oversight and monitoring. The QEP will prepare a design for an engineered cap, a Contaminated Materials Management Plan (CMMP), and a plan for ongoing Operations and Maintenance (O&M) at the site and submit to DEQ and EPA for approval. At the conclusion of cleanup, the QEP will collect confirmation samples to ensure all contaminated material has been properly removed and/or capped and will submit all documentation to DEQ and EPA to certify completion of the cleanup activities.

b. Description of Tasks/Activities and Outputs

Task 1 – Project Management / iii. Lead: WRLT ED/CD Assist: QEP
i. The Executive Director (ED) and Conservation Director (CD) of WRLT will be responsible for overall execution/management of project: tracking project tasks, schedule and budget; procure and oversee QEP and the cleanup contractor; and report on project activities and accomplishments to stakeholders. QEP will support reporting activities and will develop a Final Cleanup Report to document all project activities.
ii. Schedule: QEP to be procured July – December 2023; additional project management work will take place July 1 2023 – September 30 2027.
iv. Outputs: 15 Quarterly Reports, 4 Federal Financial Reports, 1 Final Cleanup Report
Task 2 – Community Outreach / iii. Lead: WRLT Assist: QEP, other project partners
i. WRLT will work closely with residents in Port Orford and the immediate vicinity of the site. WRLT will plan and conduct a series of annual meetings at key milestones in this project. WRLT will communicate about the project via local news outlets and electronic media. The QEP will support WRLT with community meetings and drafting articles and press releases.
ii. Schedule: January 1 2024 – September 2027 with key public meetings in January 2024 (kickoff), June 2024 (prior to cleanup start), and July 2027 (after cleanup). Status update meetings will be held annually in 2025 and 2026.
iv. Outputs: 1 Public Involvement Plan (PIP) 4 Community Meetings, 12 press releases or newspaper/web articles

Task 3 – Cleanup Planning	***| iii. Lead: QEP, Assist: WRLT***
i. Activities will include finalizing the ABCA document to include obtaining review and approval from DEQ and EPA, engineering designs for cap, evaluation for cultural and historic preservation resources, preparing the QAPP for confirmation sampling, negotiating and receiving the necessary regulatory approvals and preparing bid documents for the solicitation of cleanup contractors.	
ii. Schedule: July 1 2023 – January 1 2024	
iv. Outputs: 1 ABCA, 1 QAPP, 1 HASP, 1 CMMP, 1 O&M plan, 1 set of Bid Documents	
Task 4 – Site Cleanup	***| iii. Lead: Contractor, Assist: QEP, WRLT***
i. WRLT will use the majority of the grant funds for site cleanup. WRLT will procure a QEP and remediation contractor. Site cleanup activities to be performed as described in Section 3.a and following the cleanup plans developed under Task 3. WRLT and the QEP will work with DEQ to ensure the cleanup meets standards set by the State of Oregon.	
ii. Schedule: January 1 2024 – September 2027.	
iv. Outputs: 1 Certificate of Completion, 1 No Further Action Determination by DEQ	

c. Cost Estimates

a. Cleanup of former Western States Plywood Mill Proposed Budget

Budget Categories		Project Tasks ($)				
		Task 1 – Project Management	**Task 2 – Community Outreach**	**Task 3 – Cleanup Planning**	**Task 4 – Site Cleanup**	**Total:**
Direct Costs	**Personnel**	$37,390	$13,530	$13,600	$0	**$64,520**
	Fringe Benefits	$0	$0	$0	$0	**$0**
	Travel	$6,680	$0	$0	$0	**$6,680**
	Equipment	$0	$0	$0	$0	**$0**
	Supplies	$0	$0	$0	$0	**$0**
	Contractual	$28,800	$8,000	$45,000	$1,787,000	**$1,868,800**
	Other	$0	$0	$0	$0	**$0**
Total Direct Costs		$72,870	$21,530	$58,600	$1,787,000	**$1,940,000**
Indirect Costs		$0	$0	$0	$0	**$0**
Total Budget		**$72,870**	**$21,530**	**$58,600**	**$1,787,000**	**$1,940,000**

<u>Task 1 – Project Management - $72,870</u>

Personnel Costs*:* 48 project team meetings (48 meetings x 2 staff x $180/meeting [2 ED hours at $50/hr, 2 CD hours at $40/hr] = $17,280); 15 Quarterly Reports (15 reports x $400/report [4 ED hours at $50/hr, 5 CD hours at $40/hr] = $6,000); 4 Annual Reports (4 reports x $400/report [4 ED hours at $50/hr, 5 CD hours at $40/hr] = $1,600); 1 Final Summary Report ([30 ED hours at $50/hr, 50 CD hours at $40/hr] = $3,500); quarterly ACRES updates (16 quarters x $220 [2 ED hours at $50/hr, 3 CD hours at $40/hr] = $3,520), 2 regional brownfields conferences ([32 hours CD time at $40/hr, 32 hours ED time at $50/hr] = $2,880), 1 national brownfields conference ([32 hours CD time at $40/hr, 32 hours ED time at $50/hr $2,880] $2,880) = **$37,390**

Travel Costs*:* 2 staff to attend 2 regional conferences (2 conferences x $1,580/conference [$400 mileage, $120/night hotel x 3 nights x 2 rooms = $720 lodging, $230 per diem x 2 staff = $460 per diem total] = $3,160); 2 staff to attend 1 national conference (1 conference x $3,520 [$360 mileage, 5 days airport parking at $12/day = $60, 2 flights x $900 = $1,800, $140/night hotel x 3 nights x 2 rooms = $840, $230 per diem x 2 staff = $460 per diem total] = $3,520) **$6,680**

Costs*:* 48 project team meetings (48 meetings x $600/meeting = $28,800) = **$28,800**

Task 2 – Community Outreach - $21,530

***Personnel Costs**:* Public Involvement Plan (PIP) (6 hours ED time at $50/hr, 10 hours CD time at $40/hr, 10 hours DS time at $35/hr) = $1,050, Community Meetings (4 x $2,640 [16 hours ED time at $50/hr, 32 hours CD time at $40/hr, 16 hours Development Specialist (DS) time at $35/hr] = $10,560); Articles & Media Updates (12 times x $160 [1 hour ED time at $50/hr, 1 hour CD time at $40/hr, 2 hours DS time at $35/hr] = $1,920) = **$13,530**

Contractual Costs: Community Meetings (4 x $2,000 = $8,000) **= $8,000**

Task 3 – Cleanup Planning – $58,600

Contractual Costs: Finalize ABCA, including incorporating comments from public notice, further sampling and regulatory review ($20,000); Quality Assurance Project Plan (QAPP) ($20,000); 1 Health & Safety Plan (HASP) ($5,000); = **$45,000**

Personnel Costs: Development of Bid Documents (RFP) for cleanup activities, evaluation of bids, calling references, coordination of pre-bid onsite meeting and selection of contractors (80 hours of ED time at $50/hr, 240 hours of CD time at $40/hr) = **$13,600**

Task 4 – Site Cleanup - $1,787,000

Contractual Costs: Cleanup of 6,800 cubic yards of contaminated soil. See attached ABCA for cleanup cost estimates. (1 cleanup x $1,787,000) = **$1,787,000**

d. Measuring Environmental Results: WRLT's project team will meet monthly throughout the project period to track the project's progress in fulfilling the scope of work, goals, and objectives. Each Quarterly Report submitted to EPA will include an update of project expenditures as well as track activities and expenditures against the project schedule. If needed, corrective actions will be taken to ensure the project remains on schedule, within budget, and completed before the five-year period of performance ends. Specific metrics will include acres of property cleaned up and cleared for re-use, number of stream miles re-opened for fish access, acres of property re-vegetated with native species, linear miles of stream habitat restored, numbers of fish using the restored habitat, cubic yards of soil moved, and cubic yards of contaminated soil capped or otherwise remediated. Metrics will also include number of people participating in community meetings, feedback received, funding leveraged, and jobs created. After habitat restoration, the Curry Watershed Partnership will monitor the newly constructed stream channel for 3-5 years to ensure that the hydrology is working as intended. Fish use will be measured with fish traps, electrofishing counts or spawning surveys annually. Ongoing vegetation monitoring and management across the entire site will take place for 7-10 years after establishment to ensure that the planted native vegetation becomes established and can persist on the site. Monitoring of the capped area by WRLT will occur on an at least annual basis in perpetuity and will be further detailed in the OMMP. Additionally, information will be entered and tracked in the online ACRES database at least quarterly.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Programmatic Capability

i. Organizational Structure: WRLT is a small nonprofit, however, it has the experience and capacity to administer the EPA grant funds. It has two full time employees and one part-time employee: an Executive Director, a Conservation Director, and a Development Specialist. WRLT also has a contracted Financial Officer who manages accounting and other financial management needs. All WRLT staff and contractors are managed by the Executive Director who is overseen by WRLT's Board of Directors. The Board of Directors is

comprised of eight members that have expertise in natural resources conservation, real estate transactions, legal matters, business management, finance, fundraising and outreach. WRLT also has a Conservation Committee, a subcommittee of the full board, comprised of five board members with relevant technical skills in natural resources management, real estate transactions, administration of federal programs, and other expertise. The Conservation Committee assists WRLT staff in implementing WRLT's conservation program, including the cleanup, restoration, and acquisition of the former Western States Plywood Mill. WRLT also receives assistance from two pro-bono consultants on this project with expertise in managing brownfields cleanups and other environmental services. These consultants, Mike Rosen and Roger Brown, are committed to continuing to assist WRLT with the cleanup.

ii. Description of Key Personnel and Consultants:

Scott Fogarty, Executive Director of WRLT will lead this project. Scott has over 30 years' experience working in the environmental field ranging from working for the USEPA to being an Executive Director for four non-profit organizations. He has raised and managed over $20 million of grants and has managed budgets of over $3.6 million annually. He holds a JD with a focus on Environmental Law and MA in Political Science from West Virginia University, and a BS from Santa Clara University.

Max Beeken, Conservation Director of WRLT will assist in managing this project. Max has worked with WRLT as Conservation Director for 4.5 years and holds a BS in Marine Biology from University of Oregon. Max has conducted procurement and managed contractors on several projects, including the assessment work done to date at the site. His knowledge of the Site is critical to this project.

Mike Rosen, PhD, Environmental Engineer will provide technical expertise, assistance with planning, and review. Michael has 35 years of experience as a regulator and researcher. He founded the Oregon Voluntary Cleanup program and was a national leader in the development of Brownfields rules, regulations and programming. Most recently he managed the Watershed Division for the City of Portland, Bureau of Environmental Services.

Roger Brown, Principal and Sr. Technical Advisor at Hahn and Associates, Inc., will provide technical assistance and quality assurance during implementation of the EPA Cleanup Grant. Mr. Brown holds a MS in Geology from the University of Michigan, and has 35 years' experience in the environmental consulting field focused primarily on investigation and remediation of contaminated sites.

iii. Acquiring Additional Resources: WRLT will follow the procedures detailed in 2 CFR 200 and EPA's rule at 2 CFR 1500 to procure a QEP to provide support after the grant is awarded. WRLT will release a competitive, public Request for Qualifications no later than November 2023 and select the firm most qualified by June 2024. WRLT has previously followed these and other related CFRs as a part of previous federal cooperative agreements for funding through the US Fish and Wildlife Service. The selected firm will be prepared to start work in February 2024. WRLT will follow a similar process for procurement of a cleanup contractor unless we pursue a design-build approach, in that case only one procurement will occur.

b. Past Performance and Accomplishments

i.WRLT has not received an EPA Brownfields Grant in the past.

ii. WRLT has received other federal or non-federal assistance agreements: WRLT has received various federal and state funded assistance agreements and has successfully completed the scope of work associated to those agreements as summarized below.

(1) Purpose and Accomplishments

Date of Award	Awarding Agency	Amount	Accomplishments	Specific Outputs and Outcomes
2004	Oregon Watershed Enhancement Board	$266,200	Property acquisition on Elk River, Curry County OR to protect fish and wildlife habitat from timber harvest	160 acres of protected riparian & upland forest, 1 Property Deed, 1 Phase I ESA, 1 Title Report Reviewed, 1 Appraisal & Timber Cruise
2016	U.S. Fish and Wildlife Service	$28,963	Performed due diligence on a potential property acquisition on Pistol River, Curry County OR to protect fish and wildlife habitat and farmland from timber harvest and development	1 Appraisal, 1 Deed, 1 Phase I ESA, Title Review, 1 Restoration Plan, Maps
2019 & 2022	Business Oregon	$120,000	Former Western States Plywood Mill Brownfields Site Assessment and Characterization, Planning. Elk River, Curry County OR	1 Phase II ESA, 1 Ecological Risk Assessment, 1 Land and Water Beneficial Use Determination, 1 Wetland Delineation, 17 acres assessed and characterized

(2) Compliance of Grant Requirements

WRLT has met all of the requirements and conditions of the grant funding described above, including frequent open communication with granting agencies, completing the work plans and deliverables described in program or grant agreements including financial record keeping and reporting requirements within the established timelines. These funding programs required detailed tracking of expenses, providing invoices or funding disbursement requests, interim and final reporting, site visits, and continued monitoring of projects to ensure success post-completion.

Threshold Criteria

1. Applicant Eligibility

WRLT affirms that it is an eligible entity as a tax-exempt nonprofit corporation organized under section 501(c)3 of the Internal Revenue Code. Our current IRS determination letter is attached.

2. Previously Awarded Cleanup Grants

WRLT affirms that the site has not previously been awarded an EPA Brownfields Cleanup Grant.

3. Expenditure of Existing Multipurpose Grant Funds

WRLT affirms that the site does not have an open EPA Brownfields Multipurpose Grant.

4. Site Ownership

WRLT holds a 99-year irrevocable lease on the property. EPA has reviewed the lease and has communicated to WRLT that it qualifies as functionally equivalent to ownership for the purposes of a cleanup grant.

5. Basic Site Information

The former Western States Plywood Mill Site is currently owned by Elk River Partners LLC. One of the three parcels has a situs address of 93639 Elk River Road. The other two properties are undeveloped and do not have addresses. The map and tax lot information for the three properties is 3215-27 TL 900, 3215-27 TL901 and 3215-27 TL104. These three properties make up three-fifths of the original Western States Plywood Mill site. The remaining two properties are owned by a neighbor who is not participating in our cleanup efforts, but does not have plans to develop or change the use of the properties. WRLT plans to acquire ownership of the three properties owned by Elk River Partners LLC once cleanup is complete, projected to be within two years of the end of the EPA Cleanup Grant project period.

6. Status and History of Contamination at the Site

The site is contaminated by hazardous substances. The site was used as a plywood mill from the 1950s to 1975. After the closure of the mill, a fire burned some of the structures at the site and the mill infrastructure was removed. Subsequently, the mill property was divided into five parcels and sold to private individuals. The site is currently vacant and not in use for commercial, residential or recreational purposes. We have identified known or potential contaminants on site including metals, diesel range organics, oil range organics, gasoline range organics, semi-volatile organic compounds, polychlorinated biphenyls, benzene, toluene, ethylbenzene, xylene, formaldehyde and dioxins/furans. The draft ABCA has identified dioxins/furans in soils, sediments and surface water on the site as chemicals of concern. The site was contaminated through normal operation of the plywood milling operations and it is also thought in part by the mill allowing employees to burn household refuse in the large industrial burners on the site.

7. Brownfields Site Definition

WRLT affirms that the site is:

a) not listed or proposed for listing on the National Priorities List,
b) not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA, and

c) not subject to the jurisdiction, custody or control of the U.S. government.

8. Environmental Assessment Required for Cleanup Grant Applications

WRLT has completed a Phase II environmental site assessment in December 2018.

9. Site Characterization

WRLT is enrolled in Oregon's Voluntary Cleanup Program with Oregon Department of Environmental Quality. A letter from ODEQ is attached affirming that the site is enrolled in Oregon's Voluntary Cleanup Program (ESCI # 556) and that the site sufficiently characterized for remediation work to begin and that a draft ABCA is complete.

10. Enforcement or Other Actions

WRLT affirms there are no known ongoing or anticipated environmental enforcement or other actions related to the site for which Brownfields Grant funding is sought.

11. Site Requiring Property-Specific Determination

WRLT affirms the site does not need a Property-Specific Determination.

12. Threshold Criteria Related to CERCLA / Petroleum Liability

WRLT is exempt from CERCLA liability as a Bona Fide Prospective Purchaser under §101(40). WRLT has entered a 99-year irrevocable ground lease to operate the property and completed a Phase I AAI to ASTM Practice E1527-21 dated November 14, 2022. The property is currently owned by Elk River Partners LLC. WRLT affirms that no familial, contractual, corporate or financial relationships or affiliations exist with prior owners or operators, or other potentially responsible parties. WRLT plans to acquire the property after the cleanup work is complete.

WRLT affirms that it has not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site. The site has been vacant and has not been used for commercial, recreational or residential purposes since WRLT has entered the 99-year lease.

WRLT has not taken any action or management on site that would affect continuing releases, threatened future releases or exposure to any previously released hazardous substance. WRLT confirms our commitment to comply with any land use restrictions and not impede the effectiveness or integrity of any institutional controls, assist and cooperate with those performing the cleanup and provide access to the property, comply with all information requests and administrative subpoenas that have or may be issued in connection with the property, and provide all legally required notices.

Previous environmental investigations at the site have included the following:

• July 2017: Phase I ESAs for tax lots 900 and 901 of the Site prepared for WRLT by PBS Engineering and Environmental, Inc.

• December 2018: Phase II ESA for tax lots 104 and 900 of the Site on behalf of WRLT and Elk River Partners LLC (ERP) by Hahn and Associates, Inc., (HAI). The Phase II ESA included the following:

- Targeted geophysical survey work to assess three areas of the Site. Four anomalies were identified

during the survey, including one potential underground storage tank (UST) near the former office (see Figure 2-1)
− Advancement of 16 borings for soil and groundwater sampling
− Collection of six surface soil samples (three 3-point composite samples, and three discrete samples) within one-foot bgs across the Site.

• January 2019: Supplemental surface soil investigation for dioxins/furans by HAI. This investigation included sampling eight discrete locations (SS-1 through SS-8) within one-foot bgs across the Site.

• March 2019: Phase I ESA for tax lots 104 and 901 by HAI on behalf of WRLT and ERP.

• July 2020: Phase I ESA for tax lot 900 and an adjacent tax lot to the east, Curry County tax lot 3215-27-00902 by HAI on behalf of ERP and JJW Sustainable Land Trust, LLC (JJW).

• December 2020: TBA for the Site prepared by WSP on behalf of the EPA. This assessment included a Level 1 ERA. This investigation included the following:

− Collection of eight 30-point surface soil samples via incremental sampling methodology (ISM) from eight decision units. This included one background decision unit (DU-8) and the remaining seven decision units centered around the former northern and southern wigwam burners and the former stud mill.
− Collection of subsurface soil and groundwater samples from temporary direct-push borings across the Site.
− Collection of groundwater samples from two permanent wells on the Site, a domestic well with a downhole pump and hose spigot and an approximately 30-inch-diameter concrete cased well.
− Collection of grab surface sediment samples from the top 10 centimeters of the sediment along Bagley Creek and within the former ponds on the Site.
− Collection of surface water along Bagley Creek and within the former ponds on the Site.

• August 2022: Screening level ERA and Beneficial Land and Water Use Determination for the Site prepared by MFA on behalf of WRLT. The ERA determined potential for unacceptable risk to ecological receptors at the Site. Reasonably likely future land use at the Site includes ecological habitat and recreational use. Beneficial uses of ground and surface water at the Site and surrounding area include drinking water, discharge to surface water to support fish and aquatic life, irrigation, domestic water supply, ecological habitat, and recreation.

• November 2022: Phase I ESA for tax lots 900, 901 or 104 of the Site prepared for WRLT by HAI.

13. <u>Cleanup Authority and Oversight Structure</u>

WRLT is enrolled in the Oregon Voluntary Cleanup Program and will work closely with the Oregon Department of Environmental Quality to oversee the cleanup at the site. WRLT also plans to acquire additional technical expertise to manage, oversee and complete the cleanup activities at the site through a competitive process. WRLT will comply with the competitive procurement provisions of 2CFR §§ 200.317 through 200.327 and ensure that this technical expertise is in place prior to beginning cleanup activities.

14. <u>Community Notification</u>

WRLT has provided the community an opportunity to comment on the draft application, which included an attached draft Analysis of Brownfield Cleanup Alternatives (ABCA). WRLT will finalize the ABCA and make it available for additional public review and comment as a part of our pre-cleanup activities.

WRLT will published community notification via our Newsletter on November 5th, 2022, 17 days before our application was submitted to EPA. Additionally, WRLT ran an ad in the Port Orford News on November 2nd, posted fliers for the meeting at the Port Orford Post Office and Port Orford Library, and advertised the event on social media. The notification clearly stated that WRLT's application is available to review, instructions for obtaining WRLT's application for review and how to comment on the draft application, and the date, time and location of the public meeting.

WRLT held a public meeting to discuss the draft application and consider public comments on November 17th, 2022, at the Oregon State University Port Orford Field Station in Port Orford, OR. Attached is a summary of the public comments received, WRLT's response to those comments, a summary of the public meeting and a record of the meeting participants. Also attached is a copy of the draft ABCA, the community notification and the documentation from the public meeting.

15. <u>Contractors and Named Sub recipients</u>

WRLT will select contractors, including consultants, in compliance with the fair and open competition requirements in 2 CFR Part 200, 2 CFR Part 200 and 40 CFR Part 33. We acknowledge that EPA will not accept sole source justifications for procurement of contractors for services and that firms or individual consultants that develop or draft specifications, requirements, statements of work, or invitations for bids or requests for proposals must be excluded from competing for such procurements as provided in 2 CFR § 200.319(b). WRLT does not anticipate selecting a contractor prior to the award of EPA funds.

ANALYSIS OF BROWNFIELD CLEANUP ALTERNATIVES

FORMER WESTERN STATES PLYWOOD COOPERATIVE MILL

Prepared for

WILD RIVERS LAND TRUST

PORT ORFORD, OREGON

November 2, 2022

Project No. M2272.01.002

Prepared by

Maul Foster & Alongi, Inc.

6 Centerpointe Drive, Suite 360, Lake Oswego, OR 97035

MAUL FOSTER ALONGI

ANALYSIS OF BROWNFIELD CLEANUP ALTERNATIVES

FORMER WESTERN STATES PLYWOOD COOPERATIVE MILL, PORT ORFORD, OREGON

The material and data in this report were prepared under the supervision and direction of the undersigned.

MAUL FOSTER & ALONGI, INC.

Joshua Elliott, PE
Senior Engineer

Phil Wiescher, PhD
Principal Environmental Scientist

CONTENTS

TABLES AND ILLUSTRATIONS

FOLLOWING REPORT:

TABLES

FIGURES

ACRONYMS AND ABBREVIATIONS

ABCA	Analysis of Brownfield Cleanup Alternatives
bgs	below ground surface
CFR	Code of Federal Regulations
COC	contaminant of concern
CWA	Clean Water Act
DEQ	Department of Environmental Quality (Oregon)
DSL	Department of State Lands (Oregon)
EPA	U.S. Environmental Protection Agency
ERA	ecological risk assessment
ESA	environmental site assessment
ESCP	erosion- and sediment-control plan
ERP	Elk River Partners LLC
HAI	Hahn and Associates, Inc.
JPA	joint permit application
MFA	Maul Foster & Alongi, Inc.
NMFS	National Marine Fisheries Service
OAR	Oregon Administrative Rule
PCP	pentachlorophenol
pg/g	picograms per gram
RBC	risk-based concentration
TEQ	toxicity equivalent quotient
USACE	U.S. Army Corps of Engineers
USFWS	U.S. Fish and Wildlife Service
WRLT	Wild Rivers Land Trust
WSP	WSP USA, Inc.

1 INTRODUCTION

On behalf of Wild Rivers Land Trust (WRLT), Maul Foster & Alongi, Inc. (MFA) prepared this Analysis of Brownfield Cleanup Alternatives (ABCA) report for the Former Western States Plywood Cooperative Mill (the Site), located along the Elk River in Port Orford, Oregon. This ABCA focuses on the remediation of dioxin/furan-impacted soil and sediments which were identified as posing an unacceptable risk to ecological receptors (MFA 2022).

1.1 Purpose and Objectives

MFA completed this ABCA to meet the requirements of the U.S. Environmental Protection Agency (EPA) Brownfield Cleanup Grants program. This ABCA report includes:

- Information about the project site and planned habitat restoration activities
- Summary of previous investigations and known contaminants, and applicable regulations and cleanup standards
- Evaluation of effectiveness, long-term reliability, implementability, implementation risk, and cost of the evaluated cleanup alternatives, as well as climate change and sustainability considerations
- Selection of a preferred cleanup alternative

2 BACKGROUND

2.1 Site Description

The Site is located in section 27 of township 32 south, range 15 west of the Willamette Meridian and includes Curry County tax lots 104, 900, and 901 (see Figure 2-1). The Site is currently vacant and is covered with vegetation and disturbed ground from former plywood mill operations. Two ponds are present on the Site: the former log pond and the former fire suppression pond (see Figure 2-2). The former log pond comprises approximately 4.4 acres of freshwater Palustrine emergent wetland, primarily within tax lot 901, and is currently an overgrown low-lying marshy area (see Appendix B; WSP 2020). The former fire suppression pond occupies the northwest corner of Tax Lot 900. Bagley Creek crosses the Site in a southwest-to-northeast direction, through the former fire suppression pond and former log pond and enters the Elk River near the northeast corner of the Site. A concrete-fortified dam with an intrinsic spillway, an earthen dam, and seasonal beaver dams constrain the water along Bagley Creek into the two ponds. Most of the Site is relatively flat at an elevation of approximately 80 feet above mean sea level. The eastern portion of tax lot 104 contains a slight topographic slope to Elk River. The Site is bordered by agricultural land to the west and north and

rural residences to the east and south (see Figure 2-2). The Elk River flows along the northeast perimeter of the Site.

The Site, as well as the adjacent Curry County tax lots 902 and 903, were formerly developed and operated as a plywood mill owned by Western States Plywood Cooperative. The plywood manufacturing facility operated on the Site between approximately the 1950s until 1975. Prior to construction of the mill, the Site was vacant, undeveloped forestland. Historical features associated with the former mill are shown on Figure 2-2. The land has been largely vacant since a fire destroyed the mill in 1976. (HAI 2018; WSP 2020).

The main structure of the former plywood mill building was primarily present on an adjacent tax parcel to the east of the Site. The northwest portion of the mill building likely housed the debarking operations of the mill while the southwest portion may have been used to heat the logs prior to peeling into veneers. The locations of the gluing operations and phenolic resins storage are not known. North of the debarking area in tax lot 104 was the former stud mill. Stud mills during this period commonly treated lumber with pentachlorophenol (PCP) for anti-sap staining purposes; however, it is unknown whether PCP was used at the Site. Additional details on the historical features and operational activities are provided in the 2020 Targeted Brownfields Assessment and 2018 Phase II Environmental Site Assessment (HAI 2018; WSP 2020).

The following sensitive environments have been identified at the Site (WSP 2020):

- The Elk River is designated as a Wild and Scenic River under the National Wild and Scenic Rivers Act as well as Essential Salmonid Habitat by the Oregon Department of State Lands (DSL).
- Bagley Creek is designated as Essential Salmonid Habitat by DSL.
- The former log pond on tax lots 104 and 901 contains freshwater emergent and freshwater forest/shrub wetlands as identified in the U.S. Fish and Wildlife National Wetlands Inventory.
- The bank of the Elk River on tax lot 104 is defined as freshwater forest/shrub wetlands in the U.S. Fish and Wildlife National Wetlands Inventory.
- The banks of the Elk River and Bagley Creek are identified as Riparian Habitat by the Oregon Department of Fish and Wildlife Strategy Habitats Database.

Federally listed threatened species (i.e., Coho salmon) may be present in the adjacent Elk River during certain times of the year (e.g., while migrating) and the proposed habitat restoration of Bagley Creek is being conducted to support reintroduction of Coho salmon.

2.2 Geology, Hydrogeology, and Surface Water

The Site is located on an alluvial plain of the Elk River, surrounded to the north and south by lowland hills of Oregon's coastal range. According to WSP USA, Inc.'s, (WSP's) review of light detection and ranging imagery, there is a relatively steep slope at the northern margin of the Site consistent with an

ancestral alluvial bench rather than artificial fill placement imported to raise the grade of the Site (WSP 2020).

During previous investigations, subsurface drilling observations at the Site identified a mixture of sands, silts, and gravel to the maximum exploration depth of 25 feet below ground surface (bgs). Groundwater was typically encountered between 7 to 15 feet bgs, exceptions being the areas near the southern and northern margins of the former log pond, where groundwater was encountered approximately 7.5 and 17 feet bgs, respectively. Based on topography, Hahn and Associates, Inc. (HAI) inferred that the groundwater flow direction ranged from an easterly to a northwesterly direction, and likely was subject to seasonal variation (HAI 2018; WSP 2020).

Bagley Creek intersects the Site through the former log pond and former fire suppression pond that were constructed as part of the former plywood mill operations. The presence of the ponds and dams through Bagley Creek has prevented fish access to upstream portions of Bagley Creek from Elk River. National Wetlands Inventory maps depicts several wetlands at low spots on the Site (see Appendix B). These include freshwater emergent and freshwater forest/shrub wetlands within the former log pond, and a freshwater emergent wetland on adjacent tax lots 902 and 903.

2.3 Previous Investigations

Previous environmental investigations at the Site have included the following:

- July 2017: Phase I Environmental Site Assessments (ESAs) for tax lots 900 and 901 of the Site prepared for WRLT by PBS Engineering and Environmental, Inc. (PBS 2017a,b).
- December 2018: Phase II ESA for tax lots 104 and 900 of the Site on behalf of WRLT and Elk River Partners LLC (ERP) by HAI (HAI 2018). The Phase II ESA included the following:
  - Targeted geophysical survey work to assess three areas of the Site. Four subsurface anomalies were identified during the survey, including one potential underground storage tank (UST) near the former office (see Figure 2-2).
  - Advancement of 16 borings for soil and groundwater sampling.
  - Collection of six surface soil samples (three 3-point composite samples and three discrete samples) within the top foot of soil across the Site.
- January 2019: supplemental surface soil investigation for dioxins/furans on behalf of WRLT and ERP by HAI (HAI 2019a). This investigation included sampling eight discrete locations (SS-1 through SS-8) within the top foot of soil across the Site.
- March 2019: Phase I ESA for tax lots 104 and 901 by HAI on behalf of WRLT and ERP (HAI 2019b).
- July 2020: Phase I ESA for tax lot 900 and an adjacent tax lot to the east, Curry County tax lot 3215-27-00902 by HAI on behalf of ERP and JJW Sustainable Land Trust, LLC (HAI 2020).

- December 2020: Targeted Brownfields Assessment for the Site prepared on behalf of EPA by WSP (WSP 2020). This assessment included a Level 1 ecological risk assessment (ERA). This investigation included the following:
  - Collection of eight 30-point surface soil samples via incremental sampling methodology (ISM) from eight decision units. This included one background decision unit (DU-8) and the remaining seven decision units centered around the former northern and southern wigwam burners and the former stud mill.
  - Collection of subsurface soil and groundwater samples from temporary direct-push borings across the Site.
  - Collection of groundwater samples from two permanent wells on the Site, a domestic well with a downhole pump and hose spigot and an approximately 30-inch-diameter concrete cased well.
  - Collection of grab surface sediment samples from the upper 10 centimeters of the sediment along Bagley Creek and within the former ponds on the Site.
  - Collection of surface water along Bagley Creek and within the former ponds on the Site.

- August 2022: Screening level ERA and Beneficial Land and Water Use Determination for the Site prepared by MFA on behalf of WRLT. The ERA determined potential for unacceptable risk to ecological receptors at the Site. Reasonably likely future land use at the Site includes ecological habitat and recreational use. Beneficial uses of ground and surface water at the Site and surrounding area include drinking water, discharge to surface water to support fish and aquatic life, irrigation, domestic water supply, ecological habitat, and recreation.

2.3.1 Known Contaminants

Previous environmental investigations identified the operation of industrial machinery and vehicles onsite, leaks or spills from oil filled transformers, leaks or spills of maintenance shop-related materials stored in containers, and releases of wood treatment chemicals, such as PCP, as possible sources of contamination to the Site (WSP 2020). Potential contaminants associated with these sources included:

- Metals (including mercury)
- Diesel Range Organics
- Oil Range Organics
- Gasoline Range Organics
- Semivolatile organic compounds, including PCP and polycyclic aromatic hydrocarbons
- Polychlorinated biphenyls
- Benzene, toluene, ethylbenzene, and xylene
- Formaldehyde
- Dioxins/furans

Based on the investigations conducted, MFA prepared an ERA consistent with Oregon Department of Environmental Quality (DEQ) methodologies to determine whether contaminants at the Site currently pose, or are reasonably likely to pose in the future, unacceptable risks to ecological receptors including threatened Coho salmon under proposed future restored conditions (MFA 2022). MFA performed higher-tiered risk assessment evaluations, building on the Level 1 Scoping ERA that was previously prepared for EPA (WSP 2020), to identify ecological chemicals of concern (COCs). COCs were identified as follows and in the areas shown on Figure 2-3.

- **Soil:** Dioxin/furans for mammal populations based on a risk-based concentration (RBC) of 11 picograms per gram (pg/g) and an associated hot spot criterion of 110 pg/g for dioxin toxicity equivalent quotient (TEQ).[1]

- **Sediment:** Dioxin/furans for sediment direct toxicity based on a RBC of 21.5 pg/g and an associated hot spot criterion of 215 pg/g for dioxin TEQ.

- **Surface Water:** Elevated detections of dioxins in surface water are likely related to elevated concentrations observed in soils/sediments, and addressing these media is anticipated to account for surface water given the hydrophobic nature of these compounds.

2.4 Planned Habitat Restoration

The planned reuse for the Site is as habitat for fish and wildlife, including reintroduction of Coho salmon, a federally listed threatened species. The project will include the removal of existing barriers to fish passage and reconnection of over 1 mile of upstream habitat on Bagley Creek, a tributary to the Elk River. The project supports several plans (especially the Elk River Coho Business Plan[2]) to restore habitat for threatened and endangered fish species in the Elk River.

The former log pond, smaller fire pond, and riparian areas along Bagley Creek will be restored to a more natural ecological condition by re-establishing hydrologic connectivity and native vegetation. The upland portions of the Site will be planted with native vegetation.

2.5 Regional and Site Vulnerabilities

According to the Fourth National Climate Assessment (May, et al. 2018), trends for the northwest region of the United States include: increased temperatures during all seasons under all future scenarios; decreased snowpack; increased wildfires and insect infestations; decreased rainfall and water availability during the dry season; increased flooding during the wet season; a rising sea level; increased storm surge events; more frequent heat waves; and increased risk of landslide and erosion. The most applicable climate related vulnerability to the cleanup of the site is increased precipitation that may affect flood waters.

[1] Concentrations of dioxins/furans congeners are multiplied by their toxicity equivalent factors to estimate the toxicity of these congeners relative to 2,3,7,8-tetrachlorodibenzo-p-dioxin; the resulting concentrations may be summed into a total 2 2,3,7,8-tetrachlorodibenzo-p-dioxin TEQ concentration.

[2] The Elk River Coho Partnership, 2022. Strategic Action Plan for Coho Salmon Recovery, The Elk River.

According to the Federal Emergency Management Agency flood zone map 41015C0190F (see Appendix), the very northern and eastern boundaries of the Site are located within Zone AE, but the majority of the site is within Zone X, where minimal flooding is expected during the current 500-year recurrence interval event. The planned remediation and ecological restoration work will take place partially within Zone X.

Increased storm frequency and intensity, along with increased precipitation in the wet months, may result in more frequent and powerful flood waters within the Elk River, which may result in changes to the flood zone and increased risk of flooding of the Site. The remediation and ecological restoration of the Site is designed with these factors in mind. Based on the nature of the Site and its proposed reuse, other climate change impacts are not likely to significantly affect the Site.

3 APPLICABLE REGULATIONS AND CLEANUP STANDARDS

3.1 State Cleanup Oversight and Regulations

DEQ is responsible for overseeing cleanup at the Site. Documents prepared for the Site are submitted to DEQ under state Environmental Cleanup Site Information number 556. The site is expected to be governed under Oregon Administrative Rule (OAR) Chapter 340 Division 122—Hazardous Substance and Remedial Action Rules. These rules require that any removal or remedial action address a release or threat of release of hazardous substances in a manner that assures protection of present and future public health, safety, and welfare and the environment. The rules also provide a framework for the development of RBCs to which concentrations of contaminants are compared to evaluate the need for remediation.

3.2 Joint Permit Application

The joint permit application (JPA) is administered by the U.S. Army Corps of Engineers (USACE) to facilitate application for federal and state permits for projects impacting waters of the U.S. and state waters. The regulations relevant to cleanup at the Site are summarized in the following subsections.

3.2.1 USACE Section 404 Permit

USACE requires that a permit be obtained for the discharge of dredged or fill materials in waters of the U.S., consistent with the Clean Water Act (CWA). The permit also requires that the state issue a water quality certification for the project under CWA Section 401. Discharges of dredged or fill materials are not permitted unless there is no practicable alternative that will have less adverse impact on the aquatic ecosystem.

WRLT will prepare permit documents fulfilling the requirements of CWA Section 404. It is expected that the proposed work will be permitted under Nationwide Permit 38—Cleanup of Hazardous and

Toxic Waste. This general action permit provides for a streamlined effort for specific activities required to affect the containment, stabilization, or removal of hazardous or toxic waste materials that are performed, ordered, or sponsored by a government agency with established legal or regulatory authority.

3.2.2 Endangered Species Act and Biological Opinion

USACE permitting may prompt an Endangered Species Act determination by USACE and subsequent consultation (informal concurrence or formal consultation) with the National Marine Fisheries Service (NMFS) for coho salmon and the U.S. Fish and Wildlife Service (USFWS) for pacific marten, marbled murrelet, northern spotted owl, western snowy plover, monarch butterfly, and western lily.

These consultations would result in biological opinions in which NMFS and the USFWS would document their opinions as to whether an in-water project or action is likely to jeopardize the existence of an Endangered Species Act-listed species or to result in the destruction or improper modification of the habitat of that species. WRLT will prepare a biological evaluation or assessment, to evaluate whether adverse or negative impacts to endangered species and their critical habitats during or resulting from sediment remediation should be anticipated, to be submitted with the JPA.

Alternatively, USACE may directly evaluate whether the proposed in-water project or action is likely to jeopardize the existence of a species recorded on the Endangered Species Act list or to result in the destruction or improper modification of the habitat of that protected species. USACE may then ask the NMFS and USFWS for concurrence with their evaluation (an informal consultation).

3.2.3 CWA Section 401 Certification

The CWA requires the development of regulations to protect the quality of the nation's waters. Section 401 requires that applicants for a federal license or permit to conduct work that may result in discharges into navigable U.S. waters provide the licensing or permitting agency a certification from the state that the discharge will comply with the applicable provisions of Sections 301, 302, 303, 306, and 307 of the CWA. This program has been delegated to the State of Oregon.

The objective of the CWA (33 U.S. Code 1251-1376 and 40 CFR 129 and 131) is to restore and maintain the chemical, physical, and biological integrity of the nation's waters. Sections 303 and 304 of the CWA require the EPA to issue ambient surface water quality criteria for the protection of aquatic life and human health. The federal water quality criteria, as specified in Title 40 Part 131 of the Code of Federal Regulations (CFR), are nonenforceable guidelines to be used by states to set water quality standards for surface water. Federal water quality criteria, based on chronic and acute effects to aquatic life, have been developed for 120 priority toxic pollutants and 45 nonpriority pollutants for marine waters and freshwaters.

At least 30 days prior to submitting the JPA to DEQ's 401 program, WRLT will prepare a pre-filing request to allow DEQ to determine whether a pre-filing meeting is required. Following notification of whether a pre-filing meeting is required, WRLT and DEQ will either attend a pre-filing meeting or, if a meeting is not required, submit the application for the 401 certification. A project-specific water

quality plan and monitoring plan will be prepared, as necessary, following feedback from DEQ's 401 program.

3.2.4 Cultural Resources

The National Historic Preservation Act, passed in 1966 (16 U.S. Code 470 et seq.), established a national policy for the protection of important historic buildings and archaeological sites and outlined responsibilities for federal and state governments. Under Section 106 of the National Historic Preservation Act, each agency must consult with Oregon's State Historic Preservation Office and Indian Tribes to ensure that cultural resources are identified, and to obtain the formal opinion of the office on each site's significance and the impact of its action upon the site. The responsibilities of all parties in the Section 106 review process are set forth in federal regulations developed by the Advisory Council on Historic Preservation as 36 CFR 800. Section 106 compliance is required, as activities requiring a permit from USACE will be conducted.

Prior to submitting the JPA, WRLT will subcontract with a cultural resources firm to provide an assessment of potential cultural resources within the remedial action area. This assessment will include an inadvertent discovery plan should cultural resources be disturbed/encountered during cleanup implementation.

3.2.5 Oregon Removal/Fill Law

Oregon Revised Statute 196.795-990 requires that a permit be obtained from DSL for removal of material from or the placement of fill within waters of the state; this permit will be applied for as part of the JPA. DSL will review the application for completeness and, if so, initiate a public review period. Following completion of the public comment period and the resolution of any technical issues, DSL will evaluate the entire record against the criteria for permit issuance and either approve or deny the application.

OAR 141-145 provides the rules governing "the granting and renewal of access authorizations, leases, and easements issued to facilitate remediation conducted pursuant to an order issued by DEQ or United States Environmental Protection Agency and habitat restoration activities in, on, under, or over state-owned submerged and submersible land." This OAR requires that an easement be obtained for the construction of a sediment cap. It is expected that the proposed work will require a removal/fill permit and access authorization from DSL.

3.2.6 National Pollutant Discharge Elimination System 1200-C Permit

The National Pollutant Discharge Elimination System 1200-C permit is administered by DEQ to regulate construction activities that disturb one or more acres of land through clearing, grading, excavating, or stockpiling of fill material and where the possibility exists that stormwater could run off the Site into surface waters or conveyance systems leading to surface waters of the state during construction. To obtain a permit, applicants must prepare an erosion- and sediment-control plan (ESCP) and incorporate best management practices into their land-disturbing construction work. A

complete application packet includes an application form, Land Use Compatibility Statement, and the ESCP.

3.3 County Permits

The Site is in an unincorporated portion of Curry County. The selected cleanup alternative will require a county erosion and sediment control permit. As the cleanup will include the existing log pond (part of Bagley Creek), the project may require a floodplain development permit, also administered by Curry County. WRLT will coordinate with Curry County to identify which permits will be required and obtain those required permits.

4 CLEANUP ALTERNATIVES

The purpose of this ABCA is to identify and evaluate the most appropriate remedial alternative that reduces contaminant exposure to levels below RBCs protective of human health and the environment. This ABCA was completed in general accordance with EPA guidelines for conducting an ABCA and Oregon regulations for conducting a feasibility study (OAR 340-122-0085). This document is a draft and will be presented for public comment.

The remedial action area consists of soil/sediment with elevated concentrations of contaminants described in section 2.3.1.

4.1 Remedial Alternatives Considered

Typically, under DEQ removal authority (OAR 340-122-0090), remedial alternatives are evaluated using the following criteria:

- Effectiveness
- Long-term reliability
- Implementability
- Implementation risk
- Reasonableness of cost

The above factors are discussed below, along with a discussion of climate change and sustainability related to resilience per EPA guidance (EPA 2014).

The objective of the remedial alternatives is to mitigate risk from chemical concentrations present at a site, such that any potential exposures do not exceed levels protective of human health and the environment.

4.1.1 Alternative 1—No Action

This alternative is included as a baseline condition only and is not considered a long-term solution for remediation of the site. This alternative would not include any activities to remove, treat, monitor, or manage site contamination. If impacted soil and sediments are left in place, human and ecological exposure to soil and sediments is likely and the potential for contaminant migration via erosion would remain. This alternative is not protective of human health and the environment, and reduction of contaminant concentrations below RBCs would not be achieved. This alternative is not evaluated further.

4.1.2 Alternative 2—Excavation and Off-Site Disposal

The first remediation and restoration scenario (Alternative 2) assumes that the existing log pond dike and impacted sediments within the northern end of the log pond (adjacent to the dike) will be excavated. Excavated soil and sediment that exceeds RBCs would be disposed of offsite as nonhazardous waste in a permitted Subtitle D landfill. A 6-inch-thick residuals cover would be placed over excavated areas to stabilize the post-excavation surface and provide suitable habitat substrate. The residuals cover and all disturbed areas would be planted with native plants; planted areas would be maintained for three years.

4.1.3 Alternative 3—Excavation and Protective Cap Installation

The second remediation and restoration scenario (Alternative 3) assumes that the existing log pond dike and impacted sediments within the northern end of the log pond (adjacent to the dike) will be excavated. Excavated soil and sediment that exceeds RBCs but that does not exceed hot spot criteria (estimated to be 40% of all excavated material) would be placed upland and capped with a high-visibility geotextile and at least two feet of other soil/sediment from the Site that does not exceed RBCs. Excavated soil and sediment that exceeds hot spot criteria (estimated to be 10% of soil/sediment exceeding RBCs) would be disposed of offsite as nonhazardous waste in a permitted Subtitle D landfill. A 6-inch-thick residuals cover would be placed over excavated areas to stabilize the post-excavation surface and provide suitable habitat substrate. The residuals cover and all disturbed areas would be planted with native plants; planted areas would be maintained for three years.

4.2 Evaluation of Cleanup Alternatives

4.2.1 Effectiveness

Both Alternative 2 and Alternative 3 are judged to be effective, as they would eliminate the exposure of contaminated soil/sediment to human and ecological receptors.

4.2.2 Long-Term Reliability

Alternative 3 requires the use of institutional controls (e.g., soil management plan) and the maintenance of engineering controls (a cap) to prevent exposure of human and ecological receptors to contaminated soil.

Alternative 2 would remove all contaminated soil and sediments from the site and would not rely on either institutional controls or engineering controls. Alternative 2 is judged to be more reliable in the long term.

4.2.3 Implementability

Both proposed alternatives are considered implementable, as they utilize common construction practices. Alternative 2 is judged to be slightly more implementable as it would not require consolidation and capping of excavated soil/sediment onsite.

4.2.4 Implementation Risk

The implementation risks for the two alternatives are similar. The impact on the community would be minimized, as the cleanup site is in a rural area and not directly adjacent to residences. The nearby community would be primarily impacted by haul routes. Worker risk would be minimized by adherence to a health and safety plan. The required permits would reduce risk to the environment during construction through engineering and institutional controls.

4.2.5 Climate Change Concerns

The Elk River drainage is a rain-dominated basin, with much of the streamflow occurring between October and April. As the effects of climate change advance through midcentury and beyond, this general pattern is expected to continue. However, the frequency and magnitude of flood events are expected to increase during the rainy season, followed by decreased summer stream flows. Both Alternatives would remove contaminated sediment from the Bagley Creek drainage. While contaminated sediment would remain on site under Alternative 3, it would be capped and located well outside the floodplain of even the current 500-year event (Zone X of the flood insurance rate map).

4.2.6 Sustainability

Alternative 3 is judged to be more sustainable than Alternative 2, as it would require much less trucking of material from the Site. Alternative 2 would require trucking of all contaminated soil to a permitted landfill as well as the trucking of landfill cover materials. While the soil cover included in Alternative 3 is expected to require periodic maintenance in the long term, the additional emissions from hauling a much larger quantity of material to the landfill during initial construction (Alternative 2) are more significant that the emissions related to minor long-term maintenance activities (Alternative 3).

4.2.7 Cost

The conceptual-level cost estimate to implement Alternative 2 is approximately $2,614,000 (see Table 4-1). The conceptual-level cost estimate to implement Alternative 3 is approximately $1,787,000 (see Table 4-2).

4.3 Public Participation

The ABCA process mandates that public comments and concerns be addressed during the selection of a cleanup alternative. This ABCA report will be included in the EPA grant application to be presented for public comment. Additional public comment period(s) will be included during permitted of the cleanup action.

5 PREFERRED CLEANUP ALTERNATIVE

The preferred cleanup alternative to remediate soil and sediment with concentrations of contaminants above RBCs is Alternative 3, which includes:

- Excavation of soil and sediment with concentrations exceeding RBCs
- Off-site disposal of soil and sediment with concentrations exceeding hot-spot criteria
- Consolidation of remaining excavated soil and sediment on site
- Capping of consolidated soil and sediment with clean site soil and/or imported clean soil

Alternative 1 cannot be recommended since it does not address site risks. While Alternative 2 ranks slightly higher in long-term reliability and implementability, it ranks lower in sustainability and is nearly 50% more expensive than Alternative 3. The long-term reliability and implementability concerns of Alternative 3 can be well managed. Environmental caps are proven technologies and upland soil caps can be easily and effectively monitored. For these reasons, Alternative 3 is the preferred alternative.

LIMITATIONS

The services undertaken in completing this report were performed consistent with generally accepted professional consulting principles and practices. No other warranty, express or implied, is made. These services were performed consistent with our agreement with our client. This report is solely for the use and information of our client unless otherwise noted. Any reliance on this report by a third party is at such party's sole risk.

Opinions and recommendations contained in this report apply to conditions existing when services were performed and are intended only for the client, purposes, locations, time frames, and project parameters indicated. We are not responsible for the impacts of any changes in environmental standards, practices, or regulations subsequent to performance of services. We do not warrant the accuracy of information supplied by others, or the use of segregated portions of this report.

REFERENCES

EPA. 2014. Checklist: how to address changing climate concerns in an analysis of brownfield cleanup alternatives (ABCA). U.S. Environmental Protection Agency. April.

Hahn and Associates, Inc. (HAI). 2018. Draft phase II environmental site assessment report, Log Pond Parcel and Tax Lot 104, Former Western States Plywood Cooperative Property, Port Orford, Curry County, Oregon. Hahn and Associates, Inc., Portland, OR. December 18.

HAI. 2019a. Draft Dioxin Analytical Results, Phase II Environmental Site Assessment Report, Log Pond Parcel and Tax Lot 104, Former Western States Plywood Cooperative Property. Port Orford, Curry County, Oregon. Hahn and Associates, Inc., Portland, OR. January.

HAI. 2019b. Phase I Environmental Site Assessment, 12.26-Acre Former Plywood Mill Property. Tax Lots 104 & 901, Port Orford, Curry County, Oregon. Hahn and Associates, Inc., Portland, OR. March 8.

May, C., C. Luce, J. Casola, M. Chang, J. Cuhaciyan, M. Dalton, S. Lowe, G. Morishima, P. Mote, A. Petersen, G. Roesch-McNally, and E. York. 2018. Northwest. In In *Impacts, Risks, and Adaptation in the United States: Fourth National Climate Assessment, Volume II*. U.S. Global Change Research Program, Washington, DC.

MFA. 2022. Screening level ecological risk assessment for Former Western States Plywood Cooperative Mill. Prepared by Maul Foster & Alongi, Inc., Bellingham, Washington for the Wild Rivers Land Trust. August 25.

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TABLES

Table 4-1
Alternative 2 Conceptual Cost Estimate
Former Western States Plywood Cooperative Mill - Impacted Soil and Sediment Remediation
Wild Rivers Land Trust
Port Orford, Oregon

Alternative 2—Sediment and Soil Off-Site Disposal

Project: Former Western States Plywood Cooperative Mill
Client: Wild Rivers Land Trust
Project #: M2272.01.001
Prepared By: Josh Elliott, PE
Checked By:
Date: 10/31/2022
Revision #: 0

MAUL FOSTER ALONGI

6 Centerpointe Drive, Suite 360
Lake Oswego, OR 97035
www.maulfoster.com

Primary Assumptions:

In-place unit weight for soil (import and disposal) assumed at 1.5 tons/cubic yard.

Construction Cost	Units	Unit Cost	No. of Units	Cost
Direct Construction Costs				
Mobilization[1]	LS	10%	1	$179,000
Preliminary Site Work				
Erosion & Sediment Controls	LS	$3,000	1	$3,000
Private Utility Locate	LS	$500	1	$500
Construction-Phase Surveying	LS	$15,000	1	$15,000
Sediment and Soil Excavation and Placement				
Soil and Sediment Excavation	CY	$20	17,000	$340,000
Transportation and Disposal	TON	$100	10,200	$1,020,000
Upland Placement (non-cap)	CY	$10	10,200	$102,000
Sediment Residuals Cover				
Material Purchase and Import	TON	$50	1,500	$75,000
Material Placement	CY	$10	1,000	$10,000
Site Restoration				
Restoration Plantings	SY	$36	6,000	$216,000
Planting Maintenance (3 years)	LS	$50,000	1	$50,000
Direct Construction Costs Subtotal				**$2,010,500**
Contingency (20%)				$402,100
Design and Permitting (10%)				$201,050
CONSTRUCTION TOTAL (rounded to nearest thousand)				**$2,614,000**

NOTES:
CY = cubic yard.
LS = lump sum.
SY = square yard.
TON = ton.
[1]Calculated as 10 percent of direct construction costs excluding planting maintenance.

Table 4-2
Alternative 3 Conceptual Cost Estimate
Former Western States Plywood Cooperative Mill - Impacted Soil and Sediment Remediation
Wild Rivers Land Trust
Portl Orford, Oregon

Alternative 3—Sediment and Soil Capping On Site	MAUL FOSTER ALONGI
Project: Former Western States Plywood Cooperative Mill	
Client: Wild Rivers Land Trust	
Project #: M2272.01.001	6 Centerpointe Drive, Suite 360
Prepared By: Josh Elliott, PE	Lake Oswego, OR 97035
Checked By:	www.maulfoster.com
Date: 10/31/2022	
Revision #: 0	

Primary Assumptions:

In-place unit weight for soil (import and disposal) assumed at 1.5 tons/cubic yard.

Construction Cost	**Units**	**Unit Cost**	**No. of Units**	**Cost**
Direct Construction Costs				
Mobilization[(1)]	LS	10%	1	$121,000
Preliminary Site Work				
Erosion & Sediment Controls	LS	$5,000	1	$5,000
Private Utility Locate	LS	$500	1	$500
Construction-Phase Surveying	LS	$25,000	1	$25,000
Sediment and Soil Excavation				
Contaminated Soil and Sediment Excavation	CY	$20	6,800	$136,000
Uncontaminated Soil and Sediment Excavation	CY	$20	10,200	$204,000
Upland Soil and Sediment Placement	CY	$25	17,000	$425,000
Transport and Disposal (Hot Spot Soil/Sediment)	TON	$100	1,020	$102,000
Sediment Residuals Cover				
Material Purchase and Import	TON	$50	1,500	$75,000
Material Placement	CY	$15	1,000	$15,000
Site Restoration				
Restoration Plantings	SY	$36	6,000	$216,000
Planting Maintenance (3 years)	LS	$50,000	1	$50,000
Direct Construction Costs Subtotal				**$1,374,500**
Contingency (20%)				$274,900
Design and Permitting (10%)				$137,450
CONSTRUCTION TOTAL (rounded to nearest thousand)				**$1,787,000**

NOTES:

CY = cubic yard.

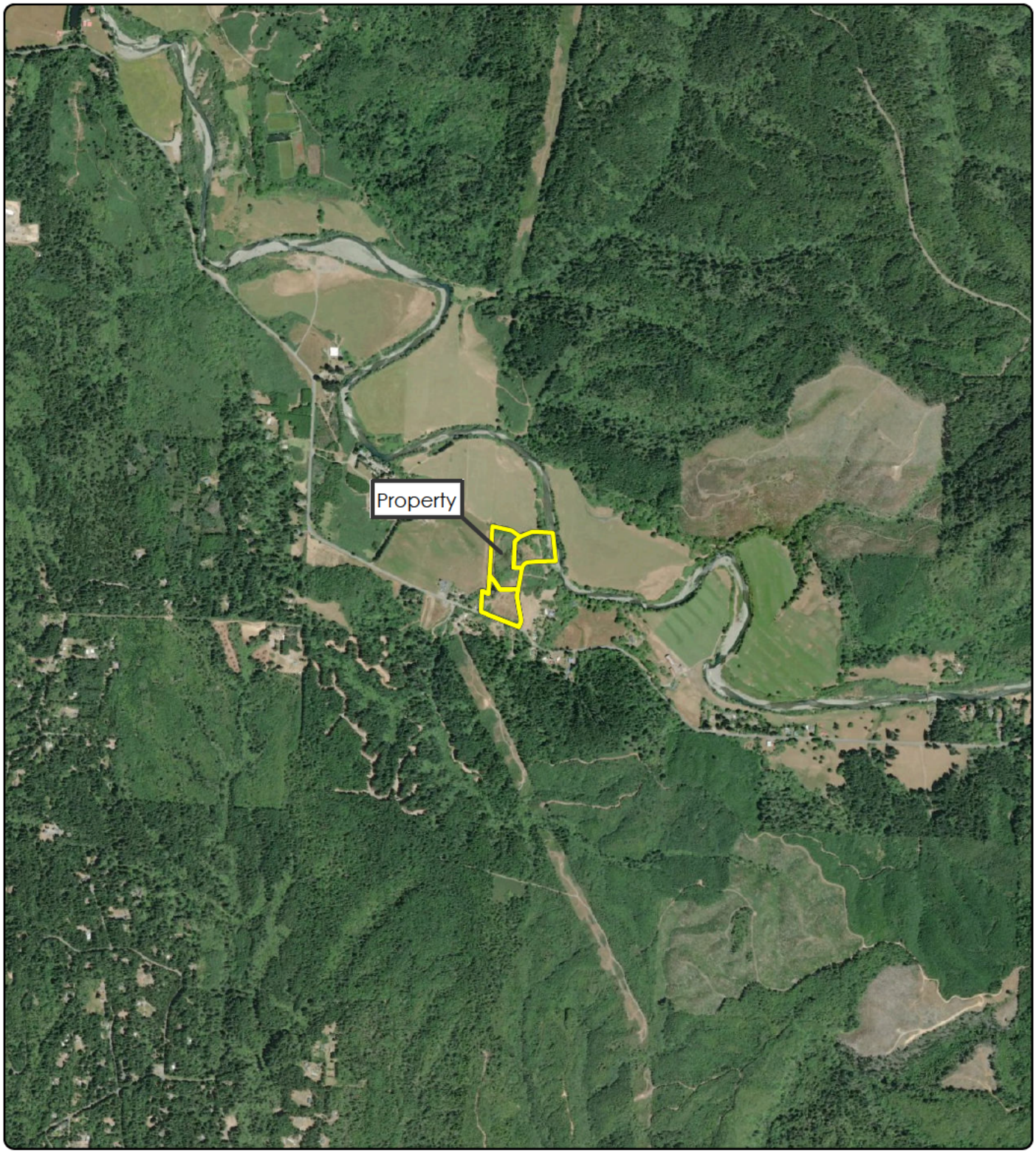
LS = lump sum.

SY = square yards.

TON = ton.

[(1)]Calculated as 10 percent of direct construction costs excluding planting maintenance.

FIGURES



Notes:
U.S. Geological Survey 7.5-minute topographic quadrangle: Sixes. Township 32 south range 15 west section 27.

Data Source:
Property boundary obtained from Curry County.

Legend

Property Boundary

Figure 2-1
Vicinity Map

Wild Rivers Land Trust
Port Orford, OR

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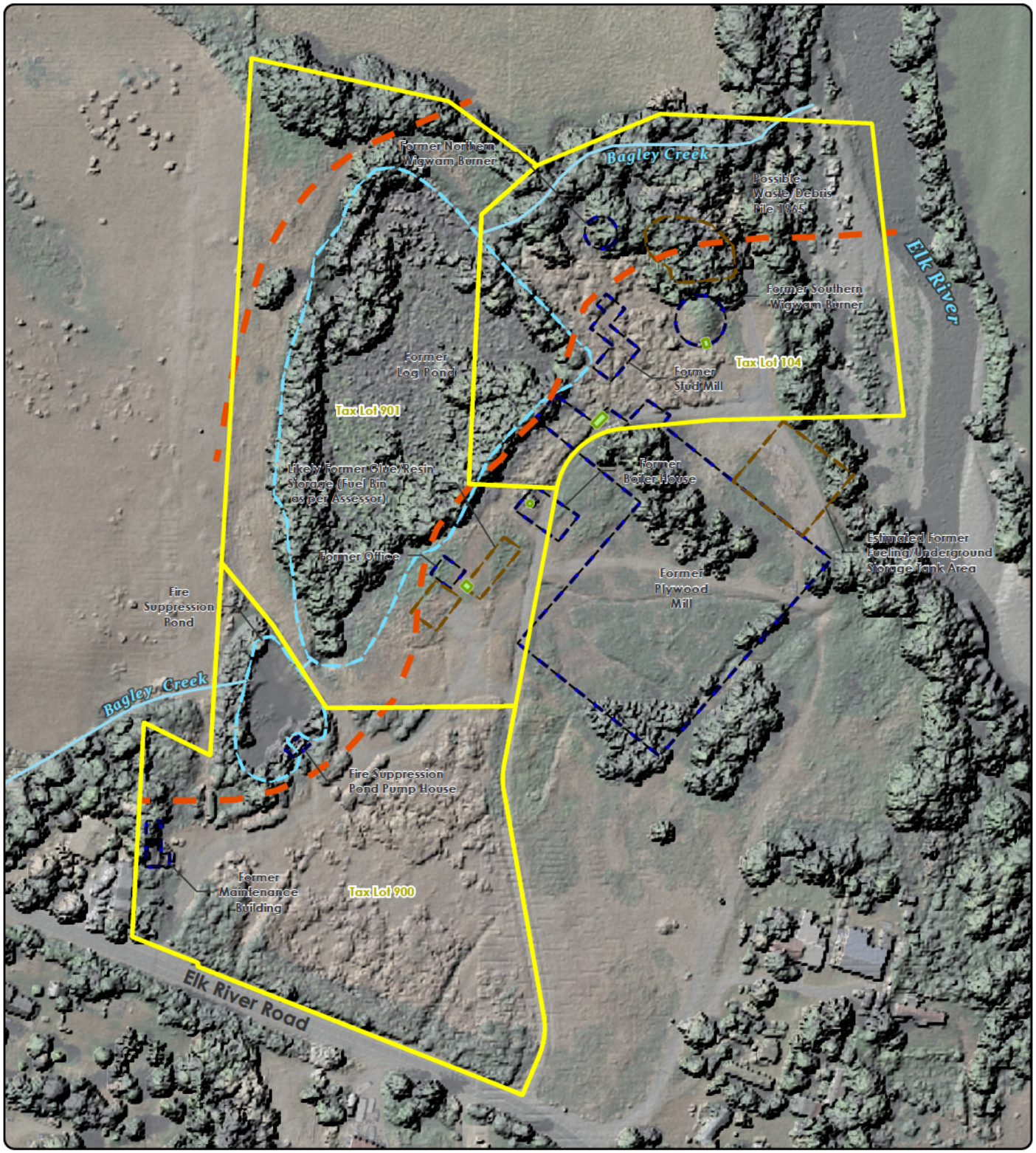
0 1 000 2 000
Feet

Path: X:\0_MFA_Projects\M2272\01\001\Projects\Pro\M2272_01_001.aprx
Print Date: 7/25/2022
Reviewed By: cwise
Produced By: jroberts
Project: M2272 01 001



Notes:
All site features are approximate.

Data Sources:
Creek possible restoration area geophysical anomalies and historic site features from HAI (2019). Property boundary obtained from Oregon Department of Revenue (2019).

Legend

- Geophysical Anomaly
- Building
- Other
- Pond
- Creek
- Possible Restoration Area
- Site Tax Lots

Figure 2-2
Historical Site Features

Wild Rivers Land Trust
Port Orford, OR

0 100 200
Feet

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Path: X:\0_MFA_Projects\M2272\01\001\Projects\Pro\M2272_01_001.aprx
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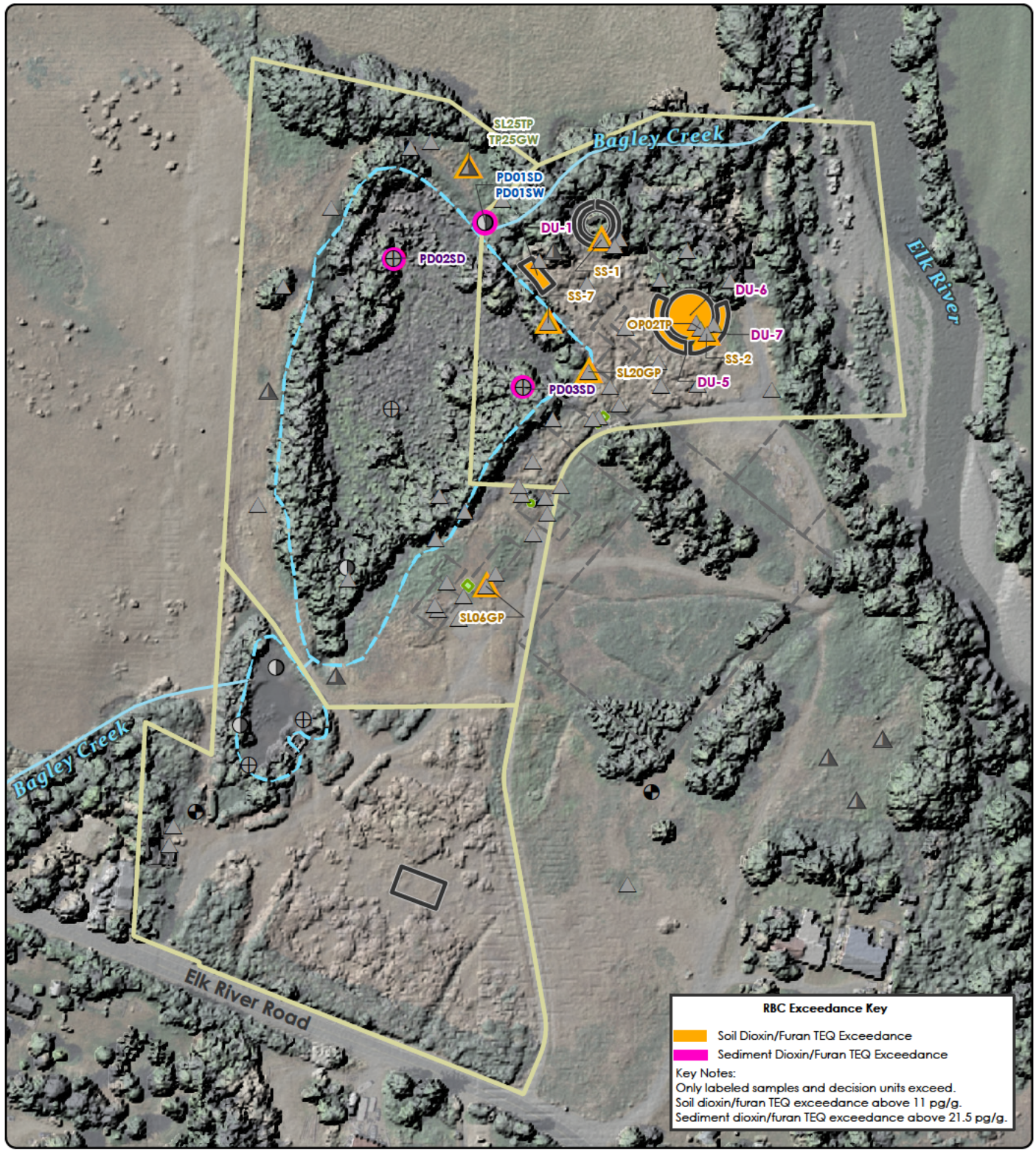
Reviewed By: clifford
Produced By: jroberts
Project: M2272 01 001



Notes:
All site features are approximate.
RBC = risk based concentrations.
TEQ = toxicity equivalents.

Data Sources:
Historic sample locations from WSP (2020) and Hahn and Associates (2018). Creek possible restoration area geophysical anomalies and historic site features from HAI (2019). Property boundary obtained from Oregon Department of Revenue (2019).

Legend

- Soil Sample
- Sediment Sample
- Groundwater Sample
- Soil and Groundwater Sample
- Sediment and Surface Water Sample
- Decision Units
- Site Tax Lots
- Creek

Historical Site Features

- Geophysical Anomaly
- Building
- Other
- Pond

0 100 200
Feet

Figure 2-3
Dioxin Tier II
RBC Exceedances

Wild Rivers Land Trust
Port Orford, OR

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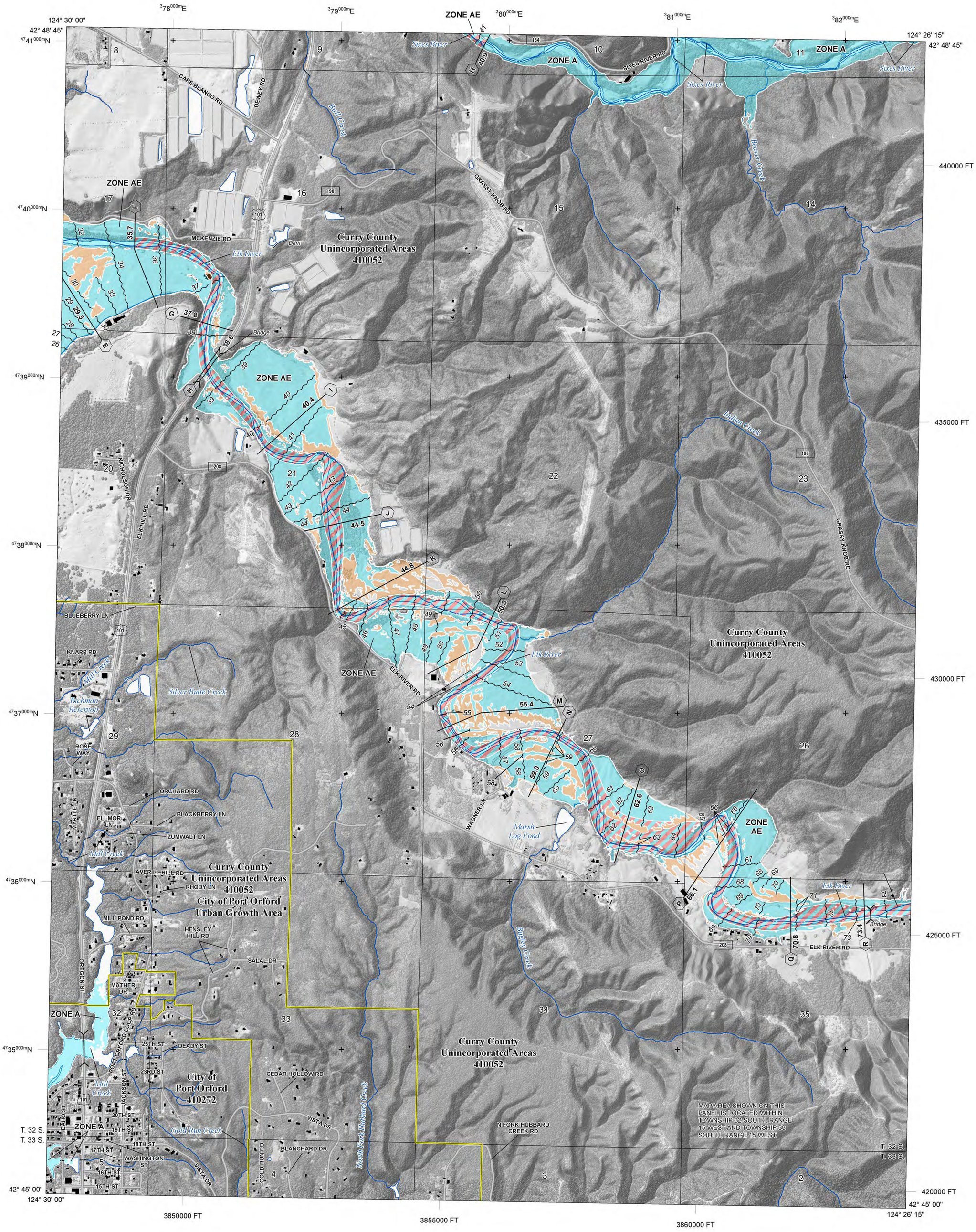
Path: X:\0_MFA_Projects\M2272\01\001\Projects\Prov\M2272_01_001.aprx
Print Date: 8/25/2022
Reviewed By: cwise
Produced By: stumer
Project: M2272 01 001

APPENDIX

FEMA FLOOD INSURANCE RATE MAP



FLOOD HAZARD INFORMATION

SEE FIS REPORT FOR ZONE DESCRIPTIONS AND INDEX MAP

THE INFORMATION DEPICTED ON THIS MAP AND SUPPORTING DOCUMENTATION ARE ALSO AVAILABLE IN DIGITAL FORMAT AT

HTTP://MSC.FEMA.GOV

SPECIAL FLOOD HAZARD AREAS
- Without Base Flood Elevation (BFE) *Zone A,V, A99*
- With BFE or Depth *Zone AE, AO, AH, VE, AR*
- Regulatory Floodway

OTHER AREAS OF FLOOD HAZARD
- 0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile *Zone X*
- Future Conditions 1% Annual Chance Flood Hazard *Zone X*
- Area with Reduced Flood Risk due to Levee See Notes. *Zone X*

OTHER AREAS
- NO SCREEN — Areas Determined to be Outside the 0.2% Annual Chance Floodplain *Zone X*
- Area of Undetermined Flood Hazard *Zone D*

GENERAL STRUCTURES
- Channel, Culvert, or Storm Sewer
- Levee, Dike, or Floodwall

OTHER FEATURES
- E 18.2 / 17.5 — Cross Sections with 1% Annual Chance Water Surface Elevation (BFE)
- 8 — Coastal Transect
- Coastal Transect Baseline
- Profile Baseline
- Hydrographic Feature
- 513 — Base Flood Elevation Line (BFE)
- Limit of Study
- Jurisdiction Boundary

NOTES TO USERS

For information and questions about this map, available products associated with this FIRM including historic versions of this FIRM, how to order products or the National Flood Insurance Program in general, please call the FEMA Map Information eXchange at 1-877-FEMA-MAP (1-877-336-2627) or visit the FEMA Map Service Center website at http://msc.fema.gov. Available products may include previously issued Letters of Map Change, a Flood Insurance Study Report, and/or digital versions of this map. Many of these products can be ordered or obtained directly from the website. Users may determine the current map date for each FIRM panel by visiting the FEMA Map Service Center website or by calling the FEMA Map Information eXchange.

Communities annexing land on adjacent FIRM panels must obtain a current copy of the adjacent panel as well as the current FIRM Index. These may be ordered directly from the Map Service Center at the number listed above.

For community and countywide map dates refer to the Flood Insurance Study report for this jurisdiction.

To determine if flood insurance is available in the community, contact your Insurance agent or call the National Flood Insurance Program at 1-800-638-6620.

Base map information shown on this work map was developed and/or compiled in digital format by the Oregon Department of Geology and Mineral Industries (DOGAMI). Data sources include DOGAMI, Oregon Lidar Consortium, Bureau of Land Management, U.S. Geological Survey, Oregon Department of Fish and Wildlife, Oregon Department of Transportation, Oregon Water Resources Department, Oregon Department of Administrative Services Geospatial Enterprise Office, and Curry County. Base map information was rectified to 3-foot resolution lidar topographic data acquired in 2008.

SCALE

N

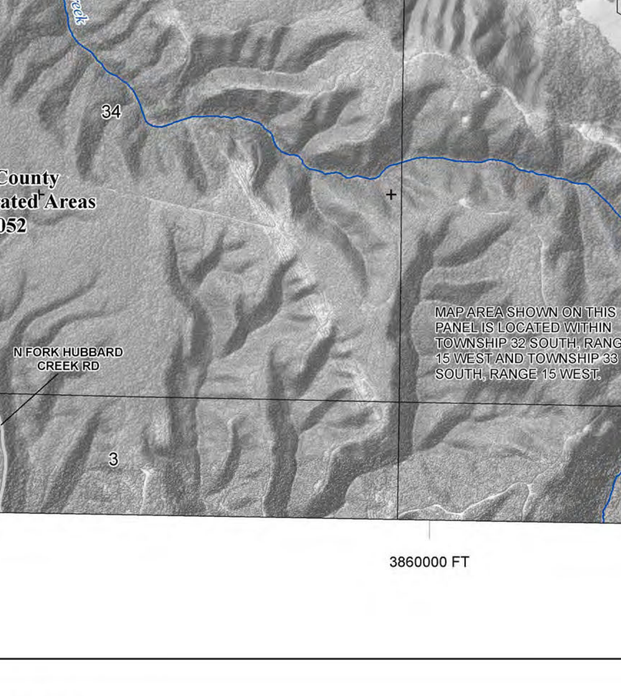
Map Projection:
Universal Transverse Mercator Zone 10N; North American Datum 1983; Western Hemisphere; Vertical Datum: NAVD 88

1 inch = 1,000 feet — 1:12,000

0 — 1,000 — 2,000 — 4,000 Feet

0 — 255 — 510 — 1,020 Meters

PANEL LOCATOR



* PANEL NOT PRINTED

FEMA

National Flood Insurance Program

NATIONAL FLOOD INSURANCE PROGRAM
FLOOD INSURANCE RATE MAP

CURRY COUNTY, OREGON
and Incorporated Areas

PANEL 190 OF 1475

FEMA

Panel Contains:

COMMUNITY	NUMBER	PANEL	SUFFIX
CURRY COUNTY	410052	0190	F
PORT ORFORD, CITY OF	410272	0190	F

VERSION NUMBER
2.3.2.1

MAP NUMBER
41015C0190F

MAP REVISED
NOVEMBER 16, 2018

Threshold Criteria

1. Applicant Eligibility

WRLT affirms that it is an eligible entity as a tax-exempt nonprofit corporation organized under section 501(c)3 of the Internal Revenue Code. Our current IRS determination letter is attached.

2. Previously Awarded Cleanup Grants

WRLT affirms that the site has not previously been awarded an EPA Brownfields Cleanup Grant.

3. Expenditure of Existing Multipurpose Grant Funds

WRLT affirms that the site does not have an open EPA Brownfields Multipurpose Grant.

4. Site Ownership

WRLT holds a 99-year irrevocable lease on the property. EPA has reviewed the lease and has communicated to WRLT that it qualifies as functionally equivalent to ownership for the purposes of a cleanup grant.

5. Basic Site Information

The former Western States Plywood Mill Site is currently owned by Elk River Partners LLC. One of the three parcels has a situs address of 93639 Elk River Road. The other two properties are undeveloped and do not have addresses. The map and tax lot information for the three properties is 3215-27 TL 900, 3215-27 TL901 and 3215-27 TL104. These three properties make up three-fifths of the original Western States Plywood Mill site. The remaining two properties are owned by a neighbor who is not participating in our cleanup efforts, but does not have plans to develop or change the use of the properties. WRLT plans to acquire ownership of the three properties owned by Elk River Partners LLC once cleanup is complete, projected to be within two years of the end of the EPA Cleanup Grant project period.

6. Status and History of Contamination at the Site

The site is contaminated by hazardous substances. The site was used as a plywood mill from the 1950s to 1975. After the closure of the mill, a fire burned some of the structures at the site and the mill infrastructure was removed. Subsequently, the mill property was divided into five parcels and sold to private individuals. The site is currently vacant and not in use for commercial, residential or recreational purposes. We have identified known or potential contaminants on site including metals, diesel range organics, oil range organics, gasoline range organics, semi-volatile organic compounds, polychlorinated biphenyls, benzene, toluene, ethylbenzene, xylene, formaldehyde and dioxins/furans. The draft ABCA has identified dioxins/furans in soils, sediments and surface water on the site as chemicals of concern. The site was contaminated through normal operation of the plywood milling operations and it is also thought in part by the mill allowing employees to burn household refuse in the large industrial burners on the site.

7. Brownfields Site Definition

WRLT affirms that the site is:

a) not listed or proposed for listing on the National Priorities List,
b) not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA, and

c) not subject to the jurisdiction, custody or control of the U.S. government.

8. Environmental Assessment Required for Cleanup Grant Applications

WRLT has completed a Phase II environmental site assessment in December 2018.

9. Site Characterization

WRLT is enrolled in Oregon's Voluntary Cleanup Program with Oregon Department of Environmental Quality. A letter from ODEQ is attached affirming that the site is enrolled in Oregon's Voluntary Cleanup Program (ESCI # 556) and that the site sufficiently characterized for remediation work to begin and that a draft ABCA is complete.

10. Enforcement or Other Actions

WRLT affirms there are no known ongoing or anticipated environmental enforcement or other actions related to the site for which Brownfields Grant funding is sought.

11. Site Requiring Property-Specific Determination

WRLT affirms the site does not need a Property-Specific Determination.

12. Threshold Criteria Related to CERCLA / Petroleum Liability

WRLT is exempt from CERCLA liability as a Bona Fide Prospective Purchaser under §101(40). WRLT has entered a 99-year irrevocable ground lease to operate the property and completed a Phase I AAI to ASTM Practice E1527-21 dated November 14, 2022. The property is currently owned by Elk River Partners LLC. WRLT affirms that no familial, contractual, corporate or financial relationships or affiliations exist with prior owners or operators, or other potentially responsible parties. WRLT plans to acquire the property after the cleanup work is complete.

WRLT affirms that it has not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site. The site has been vacant and has not been used for commercial, recreational or residential purposes since WRLT has entered the 99-year lease.

WRLT has not taken any action or management on site that would affect continuing releases, threatened future releases or exposure to any previously released hazardous substance. WRLT confirms our commitment to comply with any land use restrictions and not impede the effectiveness or integrity of any institutional controls, assist and cooperate with those performing the cleanup and provide access to the property, comply with all information requests and administrative subpoenas that have or may be issued in connection with the property, and provide all legally required notices.

Previous environmental investigations at the site have included the following:

• July 2017: Phase I ESAs for tax lots 900 and 901 of the Site prepared for WRLT by PBS Engineering and Environmental, Inc.

• December 2018: Phase II ESA for tax lots 104 and 900 of the Site on behalf of WRLT and Elk River Partners LLC (ERP) by Hahn and Associates, Inc., (HAI). The Phase II ESA included the following:

- Targeted geophysical survey work to assess three areas of the Site. Four anomalies were identified

during the survey, including one potential underground storage tank (UST) near the former office (see Figure 2-1)
− Advancement of 16 borings for soil and groundwater sampling
− Collection of six surface soil samples (three 3-point composite samples, and three discrete samples) within one-foot bgs across the Site.

• January 2019: Supplemental surface soil investigation for dioxins/furans by HAI. This investigation included sampling eight discrete locations (SS-1 through SS-8) within one-foot bgs across the Site.

• March 2019: Phase I ESA for tax lots 104 and 901 by HAI on behalf of WRLT and ERP.

• July 2020: Phase I ESA for tax lot 900 and an adjacent tax lot to the east, Curry County tax lot 3215-27-00902 by HAI on behalf of ERP and JJW Sustainable Land Trust, LLC (JJW).

• December 2020: TBA for the Site prepared by WSP on behalf of the EPA. This assessment included a Level 1 ERA. This investigation included the following:

− Collection of eight 30-point surface soil samples via incremental sampling methodology (ISM) from eight decision units. This included one background decision unit (DU-8) and the remaining seven decision units centered around the former northern and southern wigwam burners and the former stud mill.
− Collection of subsurface soil and groundwater samples from temporary direct-push borings across the Site.
− Collection of groundwater samples from two permanent wells on the Site, a domestic well with a downhole pump and hose spigot and an approximately 30-inch-diameter concrete cased well.
− Collection of grab surface sediment samples from the top 10 centimeters of the sediment along Bagley Creek and within the former ponds on the Site.
− Collection of surface water along Bagley Creek and within the former ponds on the Site.

• August 2022: Screening level ERA and Beneficial Land and Water Use Determination for the Site prepared by MFA on behalf of WRLT. The ERA determined potential for unacceptable risk to ecological receptors at the Site. Reasonably likely future land use at the Site includes ecological habitat and recreational use. Beneficial uses of ground and surface water at the Site and surrounding area include drinking water, discharge to surface water to support fish and aquatic life, irrigation, domestic water supply, ecological habitat, and recreation.

• November 2022: Phase I ESA for tax lots 900, 901 or 104 of the Site prepared for WRLT by HAI.

13. <u>Cleanup Authority and Oversight Structure</u>

WRLT is enrolled in the Oregon Voluntary Cleanup Program and will work closely with the Oregon Department of Environmental Quality to oversee the cleanup at the site. WRLT also plans to acquire additional technical expertise to manage, oversee and complete the cleanup activities at the site through a competitive process. WRLT will comply with the competitive procurement provisions of 2CFR §§ 200.317 through 200.327 and ensure that this technical expertise is in place prior to beginning cleanup activities.

14. <u>Community Notification</u>

WRLT has provided the community an opportunity to comment on the draft application, which included an attached draft Analysis of Brownfield Cleanup Alternatives (ABCA). WRLT will finalize the ABCA and make it available for additional public review and comment as a part of our pre-cleanup activities.

WRLT published community notification via our Newsletter on November 5th, 2022, 17 days before our application was submitted to EPA. Additionally, WRLT ran an ad in the Port Orford News on November 2nd, posted fliers for the meeting at the Port Orford Post Office and Port Orford Library, and advertised the event on social media. The notification clearly stated that WRLT's application is available to review, instructions for obtaining WRLT's application for review and how to comment on the draft application, and the date, time and location of the public meeting. The notice also clearly stated WRLT's intent to apply to the EPA program.

WRLT held a public meeting to discuss the draft application and consider public comments on November 17th, 2022, at the Oregon State University Port Orford Field Station in Port Orford, OR. Attached is a summary of the public comments received, WRLT's response to those comments, a summary of the public meeting and a record of the meeting participants. Also attached is a copy of the draft ABCA, the community notification and the documentation from the public meeting.

15. <u>Contractors and Named Sub recipients</u>

WRLT will select contractors, including consultants, in compliance with the fair and open competition requirements in 2 CFR Part 200, 2 CFR Part 200 and 40 CFR Part 33. We acknowledge that EPA will not accept sole source justifications for procurement of contractors for services and that firms or individual consultants that develop or draft specifications, requirements, statements of work, or invitations for bids or requests for proposals must be excluded from competing for such procurements as provided in 2 CFR § 200.319(b). WRLT does not anticipate selecting a contractor prior to the award of EPA funds.

IRS Department of the Treasury
Internal Revenue Service
P.O. Box 2508, Room 4010
Cincinnati OH 45201

In reply refer to: 4077556534
May 04, 2015 LTR 4168C 0
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BODC: TE

WILD RIVERS LAND TRUST
% DAVID ATKIN
PO BOX 1158
PORT ORFORD OR 97465-1158

048666

Employer Identification Number: 93-1289894
Person to Contact: S LENARD
Toll Free Telephone Number: 1-877-829-5500

Dear Taxpayer:

This is in response to your Mar. 26, 2015, request for information regarding your tax-exempt status.

Our records indicate that you were recognized as exempt under section 501(c)(03) of the Internal Revenue Code in a determination letter issued in March 2001.

Our records also indicate that you are not a private foundation within the meaning of section 509(a) of the Code because you are described in section(s) 509(a)(1) and 170(b)(1)(A)(vi).

Donors may deduct contributions to you as provided in section 170 of the Code. Bequests, legacies, devises, transfers, or gifts to you or for your use are deductible for Federal estate and gift tax purposes if they meet the applicable provisions of sections 2055, 2106, and 2522 of the Code.

Please refer to our website www.irs.gov/eo for information regarding filing requirements. Specifically, section 6033(j) of the Code provides that failure to file an annual information return for three consecutive years results in revocation of tax-exempt status as of the filing due date of the third return for organizations required to file. We will publish a list of organizations whose tax-exempt status was revoked under section 6033(j) of the Code on our website beginning in early 2011.

4077556534
May 04, 2015 LTR 4168C 0
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WILD RIVERS LAND TRUST
% DAVID ATKIN
PO BOX 1158
PORT ORFORD OR 97465-1158

If you have any questions, please call us at the telephone number shown in the heading of this letter.

Sincerely yours,

Tamera Ripperda
Director, Exempt Organizations

Gmail

Max Beeken <maxbeeken@gmail.com>

Public Meeting Notice

1 me age

Wild Rivers Land Trust <info@wildriverslandtrust.org> Mon, Nov 7, 2022 at 5:13 PM
Reply-To: Wild Rivers Land Trust <info@wildriverslandtrust.org>
To ma beeken@gmail com

WILD RIVERS LAND TRUST

Keeping our wild & working lands forever abundant

Wild Rivers Land Trust intends to submit an application to the Environmental Protection Agency's Brownfields Cleanup Grant funding opportunity to perform cleanup of the former Western States Plywood Co-operative site on Elk River Road.

We will hold a public meeting to discuss our application and cleanup plans from 5:00 to 6:00 pm on Thursday, November 17th at the Oregon State University Port Orford Field Station at 444 Jackson Street, Port Orford Oregon 97465. The draft Analysis of Brownfields Cleanup Alternatives can be found clicking here. A copy of the draft grant application can be requested by emailing scott@wildriverslandtrust.org or calling our office at 541-366-2130. Comments can be sent by e-mail to info@wildriver landtru t org, or post to Wild Rivers Land Trust, PO Box 1158, Port Orford Oregon 97465. Written comments must be received by Friday, November 18th. All comments will be reviewed and considered.

Learn more at on our website - "Western States Plywood Mill"

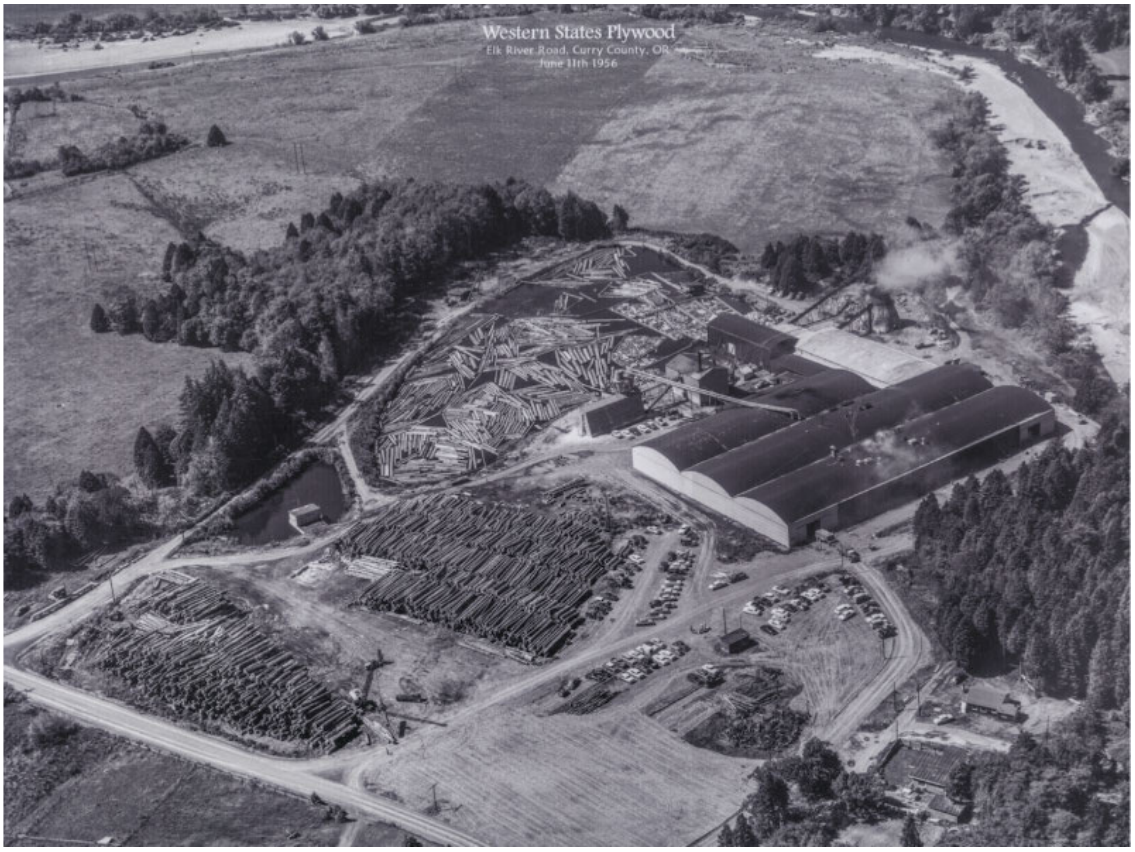

Photo of Western States Plywood Mill circa 1956

Please let us know if you have questions.

You can call us at 5541.366.2130 or email at info@wildriverslandtrust.org

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Public Meeting Notice

View Report

Campaign Preview | HTML Source | Plain-Text Email | Details

Campaign URL	https://mailchi.mp/wildriverslandtrust.org/public-meeting-notice
Delivery date & time	Mon, Nov 7, 2022 5:13 pm
From name	Wild Rivers Land Trust
From email	info@wildriverslandtrust.org
Subject line	Public Meeting Notice
Preview text	Western States Plywood Mill
Recipients	Sent to audience: **Wild Rivers Land Trust**

Summary of comments received and WRLT's responses at the pre-application meeting:

Meeting on November 17, 2022 at the OSU Port Orford Field Station, 5-6 pm.

WRLT staff briefly presented background about the site and the proposed cleanup and reuse strategies, and options presented in the draft ABCA.

Comment / Question: WRLT is only addressing a portion of the former mill site in this cleanup – what are the plans for the rest of it?

WRLT Response:

The rest of the mill site to the east is not a part of this grant, but we would be interested in working on the remainder of the mill site in the future. The portion of the mill site we are working on now contains the two former mill ponds and Bagley Creek and restoring fish passage to Bagley Creek is one of the main goals of the project so we are just focusing on this part of the property for this grant. Additionally, we were able to assess the entirety of the property in the 2020 EPA Targeted If the individual that owns the remainder of the site to the east is amenable to working with WRLT on a second phase in the future to include those lands, we would certainly be open to that.

Comment / Question: Historically, state agencies have not done much work in this area – it would be great to see some investment in this part of the state.

WRLT Response:

We couldn't agree more!

Comment / Question: Will there be a legal requirement that the property stays in conservation after cleanup?

WRLT Response:

WRLT holds a 99-year lease on the property and we intend to acquire the property in fee after the cleanup is complete. Our goals are to manage the property for biodiversity and habitat protection in perpetuity. As a part of issuing a "No Further Action" determination, Oregon DEQ may place Activity Use Limitations on the title of the property that would preclude development for housing or other uses, but this is unclear at this time. We are not envisioning any other legal restrictions on the future uses of the property before it is transferred to WRLT at this time.

Comment / Question: How did WRLT become aware of this property / opportunity?

WRLT Response:

The WRLT became aware of this opportunity through our participation in the development of the Elk River Strategic Action Plan for Coho Salmon Recovery.

Comment / Question: What benefit would restoring fish passage for salmon to Bagley Creek have?

WRLT Response:

This property contains one of the last two major fish passage barriers in the entire Elk River watershed. There is over 1 mile of spawning habitat above the current fish passage barriers that would become

available to salmon after removal of the barrier. Habitat off the main stem of the river that provide a resting place for overwintering Coho is also a limiting factor to populations and restoration of the property will provide that habitat as well.

Comment / Question: What is the timeline of the cleanup and restoration work?

WRLT Response:

Our grant period with the EPA would be 4 years, so the cleanup work would be complete by 2027. We would like to couple this with the ecological restoration work if possible in order to streamline our construction and hopefully realize some cost savings, but our restoration funding from NOAA is pending. If we are able to combine these two phases together that would be optimal, and we would hope to start work in 2024 if possible. We would hold annual community meetings and other ongoing outreach to keep the community aware of how the work is progressing.

Comment / Question: Would the cleanup work affect contamination in the groundwater?

WRLT Response:

We will be relying heavily on our environmental professionals and regulation from DEQ to understand how our proposed cleanup will affect factors such as this, and we don't have a solid answer yet. We have information in previous reports that indicates the groundwater is flowing in a northerly direction to Elk River from the site, not toward any neighboring properties. We anticipate that the groundwater wells on the site will be decommissioned as a part of the cleanup work. Additionally, much of the dioxin / furan contaminated soils are thought to be concentrated around the northern part of the Log Pond dike, which in our current understanding is hydrologically down gradient from neighboring properties. WRLT will work with our environmental professionals / contractors and regulators at DEQ to minimize unintended consequences from movement of contaminated materials.

Comment / Question: How was the amount WRLT is applying for determined?

WRLT Response:

WRLT developed an Analysis of Brownfields Cleanup Alternatives (ABCA) with the help of Maul Foster Alongi which is being reviewed by DEQ. This document compared different cleanup approaches and recommended the most cost effective approach of capping contaminated materials on site at $1.787 million. Since the budget categories for EPA grants are cut off at $500,000, $1 million and $2 million, we fell into the $2 million category. We also included costs for project management, community outreach and attending brownfields conferences in the grant budget.

Wild Rivers Land Trust
~~We keep our mailing list confidential~~

WILD RIVERS LAND TRUST: WESTERN STATES PLYWOOD MILL CLEANUP
PUBLIC MEETING: NOVEMBER 17TH, 2022 5-6 PM
EPA GRANT APPLICATION & A.B.C.A., PORT ORFORD, OR

NAME	~~MAILING ADDRESS~~ CITY/RESIDENCE	EMAIL	PHONE
Ann Schmierer	Port Orford, OR	[redacted]	
Joy Wolf	Port Orford, OR		
Mary Uhl	Langlois, OR		
John Tuck	Port Orford		

Thank you for signing up for our mailing list - we promise to keep it private.