Exhibit L
Community Action Plan
City of Oakridge’s Oakridge Industrial Park Cleanup Project
Project No. #Q11001

Overview of the Community Action Plan

The purpose of this Community Action Plan (CAP) is to describe the strategy being undertaken by the City of Oakridge (City), its consultants, and the State to address the needs and concerns of key stakeholders with interest in the project that may potentially be affected by the proposed removal of environmental contamination from the cooling and storm water retention ponds on the former Pope and Talbot, Inc. Mill Site (DEQ File No. 234). The City’s Oakridge Industrial Park Cleanup Project (Project) is located at 48513 Highway 58, Oakridge, Oregon 97463(Property). The CAP outlines how the City, its consultants, and the State have involved, and will continue to involve, affected residents, county officials and local organizations in the decision-making process regarding the environmental cleanup of the pond areas associated with the former mill site.

In 1995 as part of its acquisition of the Property, the City entered into a Letter Agreement with Oregon Department of Environmental Quality (DEQ) regarding DEQ review and oversight of the investigation and/or cleanup of the former mill site. To date, over $3.2 million has been expended towards assessment, cleanup and redevelopment of the Property. In order to help fund a portion of the remaining cleanup effort, the City was awarded $160,000 through the Oregon Coalition Brownfields Cleanup Fund managed by the Oregon Business Development Department (OBDD). Source of funds for the $160,000 Grant is through American Recovery and Reinvestment Act funds awarded to the OBDD for environmental cleanup projects. Cleanup activities at the site are anticipated to begin November 2010.

Spokesperson and Information Repository

The City of Oakridge Spokesperson for this project is: Gordon Zimmerman, City Administrator, who may be contacted at:

City of Oakridge
48319 East 1st Street, Oakridge, OR 97463
Phone: (541) 782-2258
Fax: (503) 782-1081
E-mail: gordonzimmerman@ci.oakridge.or.us

Any questions regarding the Oregon Coalition Brownfields Cleanup Fund Program – Supplemental ARRA Cleanup financing of this project may be directed to:

Karen Homolac, Brownfields Program Specialist
Oregon Business Development Department
775 Summer Street, NE, Suite 200
Salem, Oregon 97301
Phone: (503) 986-0191
Fax: (503) 581-5115
E-mail: karen.homolac@state.or.us
Any questions regarding the Oregon Department of Environmental Quality’s Voluntary Cleanup Program and Regulatory Oversight of this site may be directed to:

Bryn Thoms, Project Manager  
Oregon Department of Environmental Quality  
Western Region Eugene Office  
165 East 7th Avenue, Suite 100  
Eugene, Oregon 401  
Phone: (541) 686-7424  
Fax: (541) 686-7551  
E-mail: thoms.bryn@deq.state.or.us

Site specific and/or Funding Program information is available on the following website addresses:

2. Oregon Department of Environmental Quality: [http://www.deq.state.or.us/lq/ECSI/ecsidetail.asp?seqnbr=234](http://www.deq.state.or.us/lq/ECSI/ecsidetail.asp?seqnbr=234)
3. City of Oakridge: [http://www.ci.oakridge.or.us/](http://www.ci.oakridge.or.us/)

A. Site Description

Site Location: The property is located at 48513 Highway 58, Oakridge, Oregon. The site consists of multiple tax lots in Section 21S, Township 3E, Range 15, Willamette Meridian, Tax Map 21S-03E-22.20, Lane County, Oregon.

Site History and Background: The City acquired the site in 1995 following completion of a pre-acquisition site investigation and after negotiating an Intergovernmental Agreement (IGA) with Oregon Department of Environmental Quality (DEQ). The IGA established the criteria for investigation and cleanup of the property which the City has been following to date. The IGA requires that the City secure “No Further Action” (NFA) letters DEQ before it develops, leases, uses, or sells any part of the site, and limits the City’s liability for cleanup to only those parcels it develops, leases, uses, or sells.

Prior to 1939, a majority of the property was open meadow/pasture with drainages modified to support orchards, grass production or more intense cultivation. Sawmills have operated at the site since 1939. Pope and Talbot Inc. purchased the property in 1947 and operated there until 1989. Bald Knob Timber Company purchased the site in 1989 and operated the mill until 1990 when all mill operations ceased. A fire destroyed the sawmill building in 1991. The former mill site was purchased by the City of Oakridge in 1995. Since 1995, as part of its efforts to develop the site into an industrial park, the City divided 82 acres of the 220 acre site into 18 lots for high-priority development and DEQ issued Letters of No Further Action (NFA) on nine of those lots.

Investigation and Risk Assessment: The former mill operations included a sawmill, green chain, planning mill, drying kilns, hardboard plant, steam plant, veneer plant, machine and vehicle maintenance ships, solid waste disposal areas, cooling water ponds, storm water detention ponds, and a log pond.

Multiple environmental site investigation and removal actions have been conducted on the property since 1991 – first as part of a two-phase property transfer assessment that was conducted...
by Bald Knob prior to its purchase of the property from Pope and Talbot, Inc. in 1989 and later as part of the City of Oakridge’s pre-acquisition site investigation in 1995.

Soil, surface water, groundwater and sediment samples revealed numerous contaminants of concern such as volatile organic compounds (VOCs) including benzene, toluene, ethylbenzene, and xylene associated with fuel and solvent use; semi-volatile organic compounds (SVOCs), including polycyclic aromatic hydrocarbons (PAHs), associated with diesel fuel and lubricating oils; lead, arsenic, cadmium, chromium associated with waste oil; pentachlorophenol (PCP) and mercury associated with wood preserving solutions; phenol and formaldehyde associated with plywood glues; polychlorinated biphenyls (PCBs) associated with insulating oils; and, dioxins and furans associated with use of PCBs and PCP.

Cleanup actions conducted between 1989 and 1995 included removal and disposal offsite of a large volume of PCB-contaminated soils and debris; treating of PCB-contaminated groundwater onsite followed by discharging to a storm water system under permit, decommissioning and removal of several above- and underground storage tanks, excavation and removal of petroleum-contaminated soils from the vicinity of the underground storage tanks; and removal and disposal of PCP-contaminated soil and debris from the former dip tank area.

Sediment sampling from the storm water detention and cooling ponds taken as part of the Targeted Brownfield Assessment performed by DEQ in 2000 revealed concentrations of metals, PCBs and dioxins above human health screening levels. A Level I – Ecological Scoping Assessment performed in 2002 by EMS found that ecological receptors could potentially be exposed to chemicals in the pond sediments.

The ponds at the Oakridge Industrial Park have been managed since the 1950s as excavated log ponds, cooling ponds, a fire pond, and storm water retention ponds associated with the milling operations conducted at the site. Some filling occurred along the south edge of the log ponds complex between 1979 and 1994. The log pond fell into disuse about 1989 and two roads were advanced across the pond dividing it into three smaller ponds with culverts providing hydrologic connection.

The proposed project is to mitigate the former storm water detention and cooling ponds.

The City is participating in DEQ’s Voluntary Cleanup Program (VCP). DEQ will continue to provide oversight of the remedial project and the expense for that oversight is included in the project budget.

Analysis of Brownfield Cleanup Alternatives and Recommended Remedy: A February 5, 2010, Analysis of Brownfields Cleanup Alternatives (ABCA) prepared by Environmental Technologies Group, Inc., was reviewed by DEQ and US EPA and will result in a Remedial Action Plan that addresses remediation of the former storm water detention ponds the former cooling ponds. Remedial actions, if required for the former log ponds, will be addressed separately at a later date by the City. The ABCA assesses the means for reducing risks for future occupants of the site. The following remediation actions were selected: (1) implementation of an engineering control over the former cooling ponds (placement of a clean soil cap to prevent direct exposure to contaminants – wetland fill permit required from the Oregon Department of State Lands with onsite wetlands mitigation to improve habitat surrounding the former log ponds); and (2) elimination of the former storm water detention ponds through removal and offsite disposal at a permitted Subtitle D landfill (i.e. Coffin Butte Landfill) of soil and sediments followed by grading of the area to approximate its original topography.
Nature of Threat to Public Health and Environment: The selected remedial action for the Project is protective of present and future public health, safety and welfare and the environment, is based on a balance of effectiveness, long term reliability, implementability, implementation risk, and reasonableness of cost, and includes removal of contamination to the extent feasible. The selected remedy will achieve acceptable risk levels and prevent or minimize future releases and migration of hazardous substances in a manner that will not result in greater environmental degradation, and includes long-term care to assure protection is maintained. The selected remedy therefore satisfies the requirements of ORS 465.315, and OAR 340-122-0040 and 340-122-0090.

B. Community Background

The City’s Oakridge Industrial Park is located at 48513 HWY 58, within the city limits of Oakridge, Oregon. Sawmills have operated at the site since 1939. Pope and Talbot, Inc. purchased the property in 1947 and operated until 1989. Bald Knob Timber Company purchased the site in 1989 and operated the mill until 1990 when all mill operations ceased. The City of Oakridge purchased the property in 1995. Since 1995, as part of its efforts to develop the site into an industrial park, the City has divided 82 acres of the 220 acre site into 18 lots for high priority development and DEQ issued Letters of No Further Action (NFA) on nine of those lots. A Targeted Brownfield Assessment conducted by DEQ in 2000 ultimately resulted in DEQ issuing NFA letters for over 75% of the site in August 2001. The City currently leases to several tenants for such enterprises as automotive repair, wood pallet assembly and storage, and small-scale wood products manufacturing (specialty milling, crafts, and furniture). Outstanding to full development of the site is mitigation of the storm water detention and cooling ponds. The City has fenced and posted the storm water detention ponds to prohibit access and has retained an environmental consulting firm to address remaining site issues.

C. Chronology of Community Notification/Involvement

<table>
<thead>
<tr>
<th>Date</th>
<th>Subject</th>
<th>Action</th>
</tr>
</thead>
<tbody>
<tr>
<td>1995</td>
<td>City Acquisition of Property</td>
<td>At the time of purchase of the property, public hearings were held according to local procedure and practice.</td>
</tr>
<tr>
<td>April 26, 2010</td>
<td>DEQ Request for Comments on Proposal to Cleanup Former Ponds at Oakridge Industrial Park</td>
<td>Notice (30-day comment period) published in Secretary of State Bulletin and the Dead Mountain Echo / The First Street Collection (Oakridge).</td>
</tr>
<tr>
<td>May 1, 2010</td>
<td>DEQ Press Release</td>
<td>Public notification summarizing project and ABCA public comment period.</td>
</tr>
<tr>
<td>June 2010</td>
<td>DEQ Notice of Approved Cleanup Alternative</td>
<td>DEQ approval of Cleanup Alternative. Posted on its website at: <a href="http://www.deq.state.or.us/lq/ECSI/ecsidetail.asp?seqnbr=234">http://www.deq.state.or.us/lq/ECSI/ecsidetail.asp?seqnbr=234</a></td>
</tr>
</tbody>
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D. Continued Community Notification/Involvement Action Plan

The City of Oakridge will provide the following community notification/involvement actions:

- Written communication of project activities via City Newsletter which is sent to all homeowners residing within the city limits. Hand delivery of notices to residents on Odle Lane (do not receive City Newsletter which is only sent to residents receiving city
water service) which is located adjacent to the Oakridge Industrial Park but outside of city limits. Communication updates will also be made available on City of Oakridge’s website: http://www.ci.oakridge.or.us/.

- Publication of a legal notice no later than one month before start of Remedial/Removal activities (or after award, whichever date is earlier), in the local newspaper announcing the intended cleanup actions at the site and notifying local businesses, residences, and public property owners that a repository of information on its project, including environmental assessment, risk assessments, and other environmental information is available for viewing during normal business hours at:
  (a) DEQ’s Western Region Eugene Office, located at 165 East 7th Avenue, Suite 100, Eugene, Oregon, electronically at: http://www.deq.state.or.us/lq/ECSI/ecsidetail.asp?seqnbr=234; and,
  (b) City of Oakridge, City Hall, located at 48316 E. First Street, Oakridge, OR 97463.

- Conduct community briefings to interested community and business groups as requested.