

North Coast District Office
Bob Merrill, District Manager
710 E Street, Suite 200
Eureka, CA 95501

RECEIVED

JAN 09 2009

CALIFORNIA
COASTAL COMMISSION

EXHIBIT NO. 11
APPLICATION NO. A-1-FTB-05-053-A6 GEORGIA PACIFIC CORP. NEW CORRESPONDENCE (1 of 210)

December 18, 2008

Re: Permit A-1-FTB-05-053-A6

Dear Mr. Merrill,

We are asking that the Coastal Commission uphold the Adequate Exploration of Alternatives by supporting the current **Bench Test for Myco-remediation** as an alternative to capping the dioxin contaminated soil on the GP mill site.

The staff report refers to White Rot Fungus as a non-viable alternative in myco-remediation of dioxin contaminated soil. But there are over 300 strains already proven to have bio-remediation properties in the FungiPerfecti Fungal Library that could work on dioxin.

Paul Stamets, founder of FungiPerfecti, has spent over 30 years studying mycellium and its effect on toxins. He currently has contracts with the Department of Defense cleaning up contaminated airfields, National Institute of Science for breast cancer research and Mason County in Washington to clean up contaminated water flowing in to Puget Sound. In addition, Mr. Stamets is the author of five books on mycology, including his latest book, "Mycellium Running: How Mushrooms Can Save the World."

These vast FungiPerfecti resources are the basis for the Bench Test that is currently being negotiated between DTSC and NewFields Laboratory.

Similar research is being conducted in progressive countries around the world including Japan, Germany and Australia.

Two conference calls about this mycoremediation Bench Test have occurred with Paul Stamets, Dr. Jack Word from NewFields Laboratory, staff from Georgia

Pacific Corporation, Department of Toxic Substances Control, staff from the City of Fort Bragg, and Community Members.

Dr. Jack Word, who will be overseeing the bench test, is currently working on the third and final revision of a proposal for Bench Testing the remediation of 10kg of contaminated soil from the GP millsite. Stamets and Dr. Word are proposing the use of 20 possible samples per fungal species/treatment during a 12 week test period. More details can be found in the attached preliminary proposal.

In a quickly evolving world, bio-remediation is the ethical solution. Capping is a method of the past.

Attached Documents:

Background Information

NewFields Laboratory Brochure

NewFields preliminary Bench Test Proposal

Maps with proposed consolidation cell

New York Times and San Francisco Chronicle Articles

Background Information

January 2008: Paul Stamets toured the GP mill site with Bridgette DeShields, Linda Ruffing, and community members Antonio Wuttke and Thaïs Mazur.

May 2008: The community recommends that GP speak with Mr. Stamets about the possibility of mycellium being used to clean up the dioxin-furan contaminated soil on the GP mill site.

In a Fort Bragg City Council meeting the idea of mycoremediation is well received by the city council members and the public. GP commits to paying for a myco-remediation bench test.

June 2008: Three community members attend a workshop with Paul Stamets on mycoremediation at FungiPerfecti.

June 2008: Conference/call with DTSC, Chip Hillardes, GP, City of Fort Bragg City Manager Linda Ruffing, Bridgett Deshields (title?), Glenn Young (environmental consultant for the city of Fort Bragg), Community members Antonio Wuttke, Environmental Designer, Debra Scott, educator and Thaïs Mazur, North Coast Action.

September 2008: Second conference/call to develop the Bench Test proposal for the presently ongoing revision from NewFields Laboratory.

Sincerely,

Y Signature on File *'elin*

ORCA-Liaison - Humboldt County

David & Gail Daly
PO Box 670
Mendocino, CA 95460
707 937-0963
December 21, 2008

RECEIVED

JAN 05 2009

CALIFORNIA
COASTAL COMMISSION

North Coast District Office
Bob Merrill, District Manager
710 E Street, Suite 200
Eureka, CA 95501

Dear Sir:

We request that the California Coastal Commissioners deny permit A-1-FTB-05-053-A6 to the applicants Georgia-Pacific Corporation.

We live in the town of Mendocino and visit Fort Bragg for shopping and many other reasons on a regular basis. Our daughter lives in Fort Bragg.

The idea that some thousands of pounds of soil contaminated with dangerous cancer-causing chemicals would be buried at the corner of Cypress and Main Street makes us feel more than uneasy. We are downright frightened.

We would feel very uncomfortable knowing that there was a real possibility of our daughter, our grandchildren, and perhaps their children, walking and playing in the vicinity of a toxic burial site. We don't want a toxic waste dump in Fort Bragg.

While the process of bioremediation is still in the process of being tested, we believe that it offers a saner approach to the problem than burying these toxic substances just feet below the surface of a town.

What would happen in the event of an earthquake? A tsunami? Rising sea levels caused by global climate change?

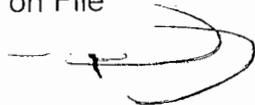
Please, reject this proposal and give bioremediation a chance to clean up the problem. Trucking the material to another location and burying it there simply moves the situation to someone else's backyard. That is just as bad as burying it here.

Sincerely,



Signature on File

David and Gail Daly



December 19, 2008

North Coast District Office
Bob Merrill, District Manager
710 E Street, Suite 200
Eureka, CA 95501

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DEC 22 2008

CALIFORNIA
COASTAL COMMISSION

Dear Mr. Merrill,

I am requesting that the California Coastal Commissioners **deny** permit A-1-FTB-05-053-A6 to the applicants Georgia-Pacific Corporation to excavate approximately 13,000 cubic yards of dioxin-impacted soil from several areas in Parcel 10 and construct a 1.5-acre consolidation cell with an engineered cap for onsite, subsurface management of excavated dioxin impacted soil.

As a north coast resident I am very concerned about the capping of 13,000 cubic yards of contaminated soil on 1.5 acres of land on the Georgia Pacific Corporation property in the heart of beautiful Fort Bragg and located in the Coastal Zone. This will negatively impact the residents and visitors to this area for generations to come.

The storing of toxic contaminated soil under the ground in the Coastal Zone is not a Coastal Dependent Activity as defined in the California Coastal Act. Georgia Pacific Corporation has been asked by the Department of Toxic Substances Control to clean up the contaminated soil - burying it in the coastal zone is NOT a clean-up. In addition, there has not be an adequate study of alternatives. The community has presented Georgia Pacific with several alternative remediation options, including mycro-remediation.

Sincerely,

Signature on File


Freddie Long
Willits, Ca

December 19, 2008

North Coast District Office
Bob Merrill, District Manager
710 E Street, Suite 200
Eureka, CA 95501

Dear Mr. Merrill,

I am requesting that the California Coastal Commissioners deny permit A-1-FTB-05-053-A6 to the applicants Georgia-Pacific Corporation to excavate approximately 13,000 cubic yards of dioxin-impacted soil from several areas in Parcel 10 and construct a 1.5-acre consolidation cell with an engineered cap for onsite, subsurface management of excavated dioxin impacted soil.

As a north coast resident I am very concerned about this plan that will negatively impact the local residents and visitors to this area for generations to come. Other solutions need to be explored before venturing down this path.

Sincerely, 

Signature on File

✓ Brian J. Weller

Willits, CA

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DEC 26 2008

CALIFORNIA
COASTAL COMMISSION

Jane Fletcher & Erin Carney

P.O. Box 939
Willits, CA 95450
707 984-7380

December 22, 2008

North Coast District Office
Bob Merrill, District Manager
710 E Street, Suite 200
Eureka, CA 95501

RECEIVED
DEC 29 2008
CALIFORNIA
COASTAL COMMISSION

Dear Mr. Merrill,

We are writing to request that the California Coastal Commissioners deny permit A-1-FTB-05-053-A6 to the applicants Georgia-Pacific Corporation.

We don't live on the Coast, but like all Mendocino County residents, we are very concerned about the capping of 13,000 cubic yards of contaminated soil on 1.5 acres of land on the Georgia Pacific Corporation property in the heart of Fort Bragg and located in the Coastal Zone. The storing of toxic contaminated soil under the ground in the Coastal Zone is not a Coastal Dependent Activity as defined in the California Coastal Act.

Permitting a major corporation to bury toxic soil on the coast, contained or not contained, will leave a dangerous legacy for generations to come.

Thank you so much for working to preserve California's precious coast line.

Signature on File

Jane Fletcher

Signature on File

Erin Carney

North Coast District Office
Bob Merrill, District Manager
710 E Street, Suite 200
Eureka, CA 95501

December 22, 2008

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DEC 29 2008

CALIFORNIA
COASTAL COMMISSION

A letter to the Coastal Commission:

This letter is requesting that the California Coastal Commissioners **deny** permit A-1-FTB-05-053-A6 to the applicants Georgia-Pacific Corporation.

Thank you

Signature on File

Janie Rezner
17201 Ocean Drive
Ft. Bragg, CA 95437

Lyles & Geraldine Pember
14271 Pt. Cabrillo Drive
Mendocino, CA 95460

Phone: 707-964-0724
FAX: 707-964-8215
email: lylesp4@comcast.net

December 26, 2008

NORTH COAST DISTRICT OFFICE
Bob Merrill, District Manager
710 E. Street, Site 200
Eureka, CA 95501

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DEC 31 2008

CALIFORNIA
COASTAL COMMISSION

RE: California Coastal Commission Hearing February 4, 2009
Georgia Pacific application Permit A-1-FTB-05-053-A6

As Coastal residents we are writing to request that the California Coastal Commissioners **deny** the subject permit. Allowing a major corporation to bury toxic soil on the coast - whether contained or not - will leave a dangerous legacy for generations to come.

With the reduction of activity by Lumber interests - and the serious reduction of opportunity in the fisheries industry - Fort Bragg has serious need for any increase that can be fostered in the tourist industry. Anything that might effect tourist interest in the area should be avoided at all costs.

We understand that alternative measures to handle the disposition of the Dioxin problem are being explored and may well produce an alternative, safe solution to soil cleansing -- and that results of the tests may become know very soon. With this in mind we hope that any decision by the Commission can be postponed at least until results of the current testing are know early in the coming year.

Sincerely



Signature on File

Lyles and ✓
Geraldine Pember

North Coast District Office
Bob Merrill, District Manager
710 E Street, suite 200
Eureka, CA 95501
December 29, 2008

RECEIVED

DEC 31 2008

CALIFORNIA
COASTAL COMMISSION

Bob:

Re: Burying Toxic Waste on GP Site

As an informed member of the Fort Bragg community, I am writing this letter to encourage the Coastal Commission to consider all of the ramifications of a decision to allow GP to bury its toxic waste in the center of our town.

First, the burying of contaminated soil in the Coastal Zone is not a Coastal Dependent Activity as defined in the California Coastal Act. Allowing this to happen creates a dangerous precedent for future generations to contend with.

The site chosen to encapsulate the 13,000 cubic yards of contaminated soil is just a few hundred feet from the coastal bluffs. With the rising sea levels and the frequent tsunami warnings, this location appears to be a very poor choice.

Capping toxic waste in the heart of Fort Bragg would adversely affect tourism, public health, and the environment. When a town's very survival depends on tourism, it makes no sense to turn it into a toxic dump.

GP's Skip Hillard's statement at the Dec. 12 CCC Hearing describing the fly ash on the Mill Site as being "like the fly ash you find in your fireplace" was erroneous. The bark that was burned in the Power House was sprayed with the fungicide Pentachlorophenol. When burned at a low temperature, this fungicide creates large molecule dioxin. Numerous ex-employees of GP have confirmed this practice as well as the practice of spraying contaminated diesel oil on bark to help it burn.

If the Coastal Commission allows temporary capping only, then the exploration of adequate alternatives can occur. Bench Test negotiations are currently underway to determine the feasibility of mycoremediation. As a member of the Mill Site Study Group, we were constantly asking the question, "What's the hurry?"

Thank you for your consideration.

Signature on File



Margaret Paul

December 30, 2008

Bob Merrill,

Do not cap toxic materials at the
Fort Bragg mill site (A-1-FTB-05-053-A6).
Do not give G.P. permission to cap.

Please investigate alternative methods,
including bio remediation using fungi.

Capping is not appropriate in the
Coastal Zone.

The site is in earthquake country
and is a tsunami zone!

The site adjoins residential neighborhoods

Therefore, do not cap toxics at the
Fort Bragg Mill site.

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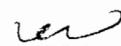
JAN 05 2009

CALIFORNIA
COASTAL COMMISSION

Linda Leitner

Jeni

Signature on File



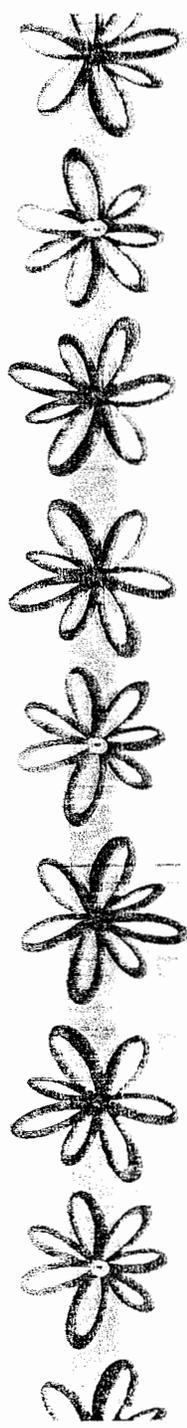
964-7673

P.O. Box 2912

Fort Bragg

95437

12/21/08



California Coastal Commission
No Coast District Office
attn: Bob Merrill

I, Caryn Bender, am a resident of Fort Bragg and I want to register my opposition to the capping of diopin contaminated waste at Cypress and Hwy 1 in Fort Bragg as requested in the Georgia Pacific Permit A1FTB0505346. There are alternative to disposing of this topic diopin waste. I am also opposed to disposing of other topic waste by capping on any other site of the Georgia Pacific cleanup in S. F. R.

It is impossible to understand how this capping of toxins could ever have been considered so close to the ocean, the Mayo river and in a city. Bad decisions have been made in the past and another bad decision is just unreasonable and unacceptable.

Very sincerely,

 Signature on File *du*
California Native

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JAN 05 2009

CALIFORNIA
COASTAL COMMISSION

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JAN 05 2009

CALIFORNIA
COASTAL COMMISSION

12-31-08

Dear Bob Marel,

I am writing to express my concern over the toxins at the Georgia-Pacific Mill Site in Fort Bragg. The dioxin at that site should NOT be capped and left in the soil for the following reasons:

First is that the Mill Site is at the ocean's edge. If you have driven along route 1 it becomes very obvious that the ocean is eroding the coast line. Each large storm demonstrates this with sea cliffs falling into the ocean.

Second - Climate Change will only exacerbate the erosion of the shore line. The sea levels are and will continue to rise putting any land along the shore at risk.

Third - Fort Bragg is in an earthquake zone and tsunami area.

For these reasons, burying poisons no matter how deep will not make these poisons safe. They will end up in the ocean. An alternative needs to be found.

Please turn down permit

A1FTB0505386

Sincerely,

Kath Signature on File eck

Kathryn Schubeck

Madge Strong
1851 Crawford Dr.
Willits, CA 95490

December 31, 2008

Bob Merrill, Director
North Coast District Office
California Coastal Commission
710 East St., Suite 200
Eureka, CA 95501

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JAN 05 2009

CALIFORNIA
COASTAL COMMISSION

Re: A1FTB05053A6
Capping Toxic Wastes at GP Mill Site, Ft. Bragg

Dear Commissioners and Staff:

As a former staff member of the Coastal Commission, former resident of Ft. Bragg and frequent visitor to the North Coast, I am extremely concerned about the proposal to store and cap wastes from the Georgia Pacific Mill site in this populated and tourist-serving area.

These wastes are highly toxic, and burying them does not provide a safe long-term solution, particularly in an area that is subject to tsunamis, earthquakes and other unpredictable changes.

The opportunity to test and implement remediation alternatives – particularly mycorrhizal remediation - should be fully explored and adequately funded. This challenging problem could become a model for truly safe, effective and permanent toxic waste disposal instead of a buried brew to plague future generations of residents and visitors.

Signature on File

Madge Strong



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Dec. 31, 2008

NOV 4 5 2009

CALIFORNIA
COASTAL COMMISSION

I am writing to you because I believe it is incorrect to permit the Georgia-Pacific corporation to bury the contaminated soil at the former Georgia-Pacific lumber mill. The people of the community do not feel that burying contaminated soil will solve the problem. It is just a quick get-it-out-of-here-way solution to a major problem. Do not grant Georgia-Pacific corporation permission to bury the contaminated soil.

I believe bioremediation is a solution that should be given consideration. Thank you

Reference #
TB05053A6

Bar Signature on File is
33 yr resident of

Please help our community survive
A1H750
5053AB

Dec 31, 2008
Box 255
Little River, 95458

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JAN 05 2009

CALIFORNIA
COASTAL COMMISSION

Dear Coastal Commissioners

I am writing you to urge
your concern to deny a
permit to fill in Ft Bragg
caly to remove toxic dirt
and bury it nearby in a
toxic waste pile - This
will impact our beautiful
coastal community to
poisons and health
problems as the potential

18 of 210

For rising seas, earthquakes & tsunamis
Destroy tourism and life.
Thank you - Signature on File
with Ft Bragg coastal community

Frances Koliner
PO Box 1063
Windsor, CA. 95490
Dec 31, 2008

North Coast Dist. Office
Calif. Coastal Commission
Attn: Bob Mergel
Suite 200
710 "E" St.
Eureka, CA. 95501

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JAN 05 2009

CALIFORNIA
COASTAL COMMISSION

Dear Bob Mergel + the California Coastal
Commission;

I am strongly opposed to permit # #
A1FTBO 5053A6, concerning the
capping of & storing of dioxin contaminated
soil in the town of Fort Bragg.

I live in the county of Mendocino.
I travel to Fort Bragg once a week. I
walk along the coast each week.

I am opposed to this permit in that
capping of toxic soil is not a coastal activity
in the coastal zone.

There has not been a adequate exploration
of alternative solutions such as bio-remediation.
I strongly strongly feel that mushroom bio
remediation has strong possibility and should
be studied. I recommend that the Fort Bragg
mill site become a bench test site and
that this be studied before the permit for
capping is issued.

Should you - Coastal Commission give further thought to this permit consider the placement of this site, merely 100's of feet from the ocean. This raises grave concerns about tsunami waves, and earthquakes.

Looking to the future, rising sea level concern me with pile of dioxin laden soil only several 100 feet from the ocean levels at this time. What will the future bring?

I think the best choice at this time is to study bio remediation w/ the Ft. Bragg mill site as our benchmark site. This ~~is~~ should be funded by Georgia Pacific, who offered to fund this study. They should be held to their agreement.

I respectfully submit this to you. I feel strongly against a pile of toxic dirt with dirt on top, rubber ^{liners} with a 30 lb spar underneath and wild unpredictable ocean only 100's of feet distance. Please vote NO on this permit.

Fa Signature on File 'rev
PO Box 1063
Willits CA. 95490

Permit # A1FTB0505386
RECEIVED

JAN 05 2009

CALIFORNIA
COASTAL COMMISSION

Dec. 31, 2008

Dear Bob Murell

I am writing to express great opposition to the capping of toxins on the old G.P. millsite. I realize that alternatives also have their downsides but capping toxins in that location is the worst alternative for our community. Once capped it is my firm belief that it will remain capped & will not be dealt with in the future. Decades from now if not sooner waves from storms exacerbated by a rising sea level or earthquakes may well expose & spread toxins creating an even worse situation. Ground water may leach toxins into our coast & contaminate seafood & animal life that our community relies on.

I remember in 1983 or 84 hearing of a toxic transformer leak at G.P. & workers were told to bury it & not talk about it. This was the town story that passed to the College of the Redwoods, woodworking program where I was a student at the time. The story that reached us implied G.P. knew they were dealing with this in an improper if not illegal manner at the time. G.P. should not now 25 years later get off dealing with the cheapest alternative unless it is the safest & best alternative for our community.

Sincerely,

RECEIVED

Dec. 31st 2008

JAN 06 2009

CALIFORNIA
COASTAL COMMISSION

- Attn: Bob Merrill and/or California Coastal Commission

I'm writing this letter concerning the issue of Georgia Pacific Permit # A1FTB05053A6, that is to be used to cap+bury on a 1.5 acre lot near Highway 1 and Cypress. I am seriously opposed to this permit and action of first burying and then ~~putting~~^{putting} a cap on the toxic sludge.

I'm also concerned by the additional 9+ acres Georgia Pacific owns in the same area. Concerned that if permit A1FTB05053A6 is allowed, similar events and shameful acts might take place in the future on the additional 9+ acres.

Please don't allow this to happen! I'm a Mendocino county resident and frequently enjoy adalone diving along with many other coastal activities. I run a small Trucking Business (Stempson Trucking) and hope to someday move to the Fort Bragg area to build a home and raise my family. I may re-consider moving to an area that promotes such damaging toxic dumping and disposal actions. What about Myard-remediation or other sites.

Thank You, Zac Stempson

22 of 210

Signature on File on

P.S. It's not a coastal-dependent activity to cap+bury toxins.

Janice V. Gendreau
P.O. Box 2229
Willits, CA 95490

707 459-1204

December 31, 2008

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JAN 05 2009

CALIFORNIA
COASTAL COMMISSION

Bob Merrill
California Coastal Commission
710 E Street, #200
Eureka, CA 95501

Re: Remediation at Georgia Pacific Mill Site
Not Capping

Dear Mr. Merrill,

I am writing to express my concern about the handling of toxic soils at the former Georgia Pacific Mill site in Fort Bragg.

I understand that Georgia Pacific is proposing to "cap" the toxic soils. These toxins include dioxin which formed when Georgia Pacific burned chemicals on the site. This cheap and fast "cover up" (pun intended) is not acceptable to our community. This capping is a measure that doesn't deal with the problem but puts it off for future generations. All remedial efforts need to be made to clean up the site by Georgia Pacific, a company that profited nicely from the industry at this Fort Bragg site.

Georgia Pacific needs to be held accountable for the toxic waste they created. They should fund all remedial approaches including bench tests that may provide innovative methods of removing toxins from the soil.

I hope the California Coastal Commission will seek remediation of the toxic soils at this site and protect our precious coast from continued contamination.

Sincerely,

Signature on File



Janice Gendreau

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JAN 07 2009

CALIFORNIA
COASTAL COMMISSION

Joan Rudman
1651 Cameron Road
Elk, California 95432
(707) 877-3335
jrudman@mcn.org

Dec. 31, 2008

Bob Merrill,
No. Coast District
California Coastal Commission
710 East Street, Suite 200
Eureka, California, 95501

Re. AIFTB05053A6

Sir,

I am mightily concerned regarding the possibility of capping the contaminated materials from the mill in the Fort Bragg area.

Since there is danger of global warming with the accompanying possibility of raising sea levels, the situation could be disastrous for the Fort Bragg and surrounding areas.

This is a concern for all of the visitors and residents of the beautiful coastal area we all treasure and need to protect.

I urge you to find a better and less dangerous alternative to capping or other contaminating methods of disposing of the waste from the mill!

Yours truly,

4th Coast Dist Office
Life Coastal Commission

ec. 31, 2008

re: Permit # A1FTB05053A6

Please deny approval for this
permit to cap dioxin contaminated
soils at the former Georgia -
Pacific mill site.

There are better alternatives that
have not been explored and
insufficient research into
more environmentally sound
solutions.

Thank you for your consideration.

Signature on File

Box 513

rg

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JAN 08 2009

CALIFORNIA

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JAN 05 2009

CALIFORNIA
COASTAL COMMISSION

Jan. 1, 2009

FROM: Susan Nagle, Mendocino Coast Resident
PO BOX 263
Albion, CA 95410

TO: North Coast District Office, California Coastal Commission
Bob Murrel, District Manager
710 East Street
Eureka, CA 95501

Re: Permit # A 1 FTB 05053A6

Dear Coastal Commission and Bob Murrel,

I am writing on the issue of the permit application above submitted by Georgia Pacific on the Fort Bragg mill site.

I am apposed to the idea of piling up toxic soil or burying it in the ground on the GP mill site for several reasons:

1. This idea is not a coastal dependant activity. There is much room for eer with this plan including accidental water run off so close to the ocean and town, the life of the liner is significantly less than the life of contaminated soil, and the contamination continues.
2. There has not been adequate research as to a full site composite. Also, mycoremediation has not been adequately researched and promises more of a remediation action.

My understanding of the mycoremediation is more complete as to a cleaner outcome and that more than white rot fungus can be used - Paul Stammers has over 300 strains that have potential remediation properties alone or together. GP has a responsibility to fund this ground breaking research to clean up this site and all the others they have.

3. Another concern is about Global Warming and rising sea levels. This could prove to be a serious issue to have contaminated soil so close to the ocean.

I ask that you consider these points when making your decision. Please consider the people living in Fort Bragg area, the wildlife and ocean life that depend on clean, uncontaminated air, water and soil.

Let us hold accountable those that toxify our land, water and air to foster true and complete clean up off their toxic waste

Thank you for your consideration.

 Signature on File

Concerned citizen
Studyier of mycoremediation

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JAN 05 2009

January 1, 2009

CALIFORNIA
COASTAL COMMISSION

To: Bob Merrill
710 E. Street, Suite 200
Eureka, Ca. 95501

Regarding the Mill site in Fort Bragg:

My husband and I DO NOT support the proposal to dig up the Mill Site and move its toxic chemicals to the center of Fort Bragg. We do, however, support the proposal to take samples of the soil for testing and proceed with alternatives for cleansing the site such as mushroom and other non-toxic solutions. Let's start out the new year in a NEW WAY!

Yours Truly,

Signature on File



Signature on File



U

January 1, 2009

North Coast District Office
Bob Merrill, District Manager
710 E Street, Suite 200
Eureka, CA 95501

CDP A-1-FTB-05-053-A6
DENY

Dear Mr. Merrill,

I am writing to ask the Coastal Commission to DENY the Georgia-Pacific Corporation CDP Application A-1-FTB-05-053-A6. Simply stated, permanently capping and containing carcinogens within the Coastal Zone is not an acceptable coastal-dependent activity. Approving this project would pave the way for future capping and containment at other locations on this site and elsewhere along the California coast.

A better alternative would be to temporarily contain the contaminated soils on site and utilize promising new myco-remediation technologies. Should myco-remediation fail to reduce dioxin levels to target values within a certain time period the containment cells can then be capped as currently proposed by the applicant, or removed and trucked to an approved disposal site. Such an approach would set a far more favorable precedent for handling dangerous contaminated soils within the Coastal Zone.

Thank you for considering my views on this important matter.

Sincerely,

Signature on File

Francis Drouillard, PE
2021 Shady Lane
Novato, CA 94945

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JAN 05 2009

CALIFORNIA
COASTAL COMMISSION

January 1, 2009

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JAN 05 2009

CALIFORNIA
COASTAL COMMISSION

North Coast District Office
California Coastal Commission, attn: Bob Merrill
710 East St., Suite 200
Eureka, CA 95501

RE: A1FTB05053A6, Georgia Pacific Mill Site in Fort Bragg, CA

SAMPLE LETTER (create your own or vary this one)

Dear Mr. Merrill:

I am writing to oppose capping the dioxin and other toxin-laden soils and instead pursue fully funded mycoremediation and bioremediation. It is irresponsible to allow Georgia Pacific the less costly option in the coastal zone where earthquakes, tsunamis, global warming, and definite migration which even without these events would transport the toxins into the ocean and into the Fort Bragg environment. Bench tests of mycoremediation must be fully funded so the appropriate fungi can be found. An underfunded test which "fails" could give GP the excuse to revert to capping.

Myco- and bioremediation would create a new precedent for dealing with toxins, bring increased tourism to benefit the local economy and solve rather than hide the problem. Again, capping would pass problems to future generations and is not a viable option this close to the coast.

Sincerely,

(Signature on File _____

Julia Carrera
10021 Madrone Ln.
Redwood Valley, CA 95470
707.489.0996
msacupuncture@earthlink.net

From Jocelyn Chapman
3053 Fillmore St ~~SE~~
#159
SF CA 94123

1/1/09

Regarding permit A-1-FTB-05-053 Ab

To Bob Merrill,

I heard a radio show
yesterday about the proposed
clean up of GP mill land
near Ft Bragg. I think its
great that you are considering
opening the space to a trail.

I am concerned that the
clean up plan will create
another toxic site near to
the city. There was some
discussion on using fungi
to break down the waste

What a fabulous idea!

Please reconsider this
project and the innovative
options that are available
to creating a hazard
near to town.

Signature on File

Signature on File

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JAN 10 2009
CALIFORNIA
COASTAL COMMISSION

North Coast District Office
Bob Merrill, District Manager
710 E Street, Suite 200
Eureka, CA 95501

RECEIVED

January 1, 2009

JAN 07 2009

Dear Mr. Merrill,

CALIFORNIA
COASTAL COMMISSION

I'm writing in opposition to the proposed massive toxic waste "capping" on the Georgia Pacific site located on our headlands in down town Ft. Bragg. I'm requesting that the California Coastal Commissioners deny permit A-1-FTB-05-053-A6 to the applicants Georgia-Pacific Corp. It's disgraceful to even consider this a possible solution to such a tremendous problem. The location where this project would take place is in an area that receives Tsunami warnings on a regular basis. The site chosen for the consolidation cell is only a few hundred yards from the coastal bluffs. At this site the toxic waste would be buried 6 feet beneath the soil surface. That seems incredibly dangerous to me!

There is great concern about rising sea levels. Permitting a major corporation to bury toxic soil on the coast, contained or not contained, will leave a dangerous legacy for generations to come. There is more than just the 13,000 cy of dioxin contaminated soil on the mill site found to date. Capping will set a precedent for capping other dioxin contaminated soil in the future

I believe the function of the coastal commission is to protect the coastal wildlife and ocean life. There is no guarantee that there won't be run off as well as the fact that the liner could degrade before the soil is non-toxic. There needs to be more research done as to a full site evaluation. Also, the possibilities of Mycoremediation have not been adequately researched. More than White Rot Fungus can be used in this process and Paul Stammets has over 300 strains for potential.

The north coast of California is a beautiful, pristine place on our planet. Let's preserve it's unspoiledness for future generations instead of carelessly allowing for the possible accidents that could take place with this toxic waste. Again, I urge you to deny the permit for which Georgia-Pacific has applied.

Sincerely,

 Signature on File 

Sunshine Taylor
45310 Pacifica Dr.
Caspar, CA. 95420

P.O. Box 163
Mendocino, CA 95460

January 1, 2009

California Coastal Commission
North Coast District Office
attention Bob Merrill
710 E St., Suite 200
Eureka, CA 95561

re: permit # A1FTB05053A6

Dear Mr. Merrill:

We do not want Georgia Pacific Lumber to bury toxics at the southern end of the Fort Bragg Mill site. This is not a coastal activity. There has not been adequate investigation to see what is effective. We'd like to see micro-remediation given a chance, namely with Paul Stamets' mycelium.

Sincerely,

Signature on File

RECEIVED

JAN 07 2009

CALIFORNIA
COASTAL COMMISSION

1-1-08

Dear Mr. Merrill,

Please deny permit # A1 FTB05053A6, the permit that allows capping of deep contaminated soils on the Georgia Pacific former mill site in Fort Brass.

I do not feel that sufficient study has been done to review the full extent of contamination on the site. Before piecemeal actions are taken, a full site review and adequately funded study of alternatives must be done.

This is a chance for us as a community, in cooperation with specialists, to try myco-remediation of these soils, in a careful

planned manner.

In 30 years, will the oceans levels have changed, will Fort Bragg be in a tsunami zone, will the capping materials have eroded? This plan is located in middle of the most populated area on our part of the coast, in an area becoming more dependant on tourism all the time.

I encourage Georgia Pacific to fully fund a thorough testing of in-situ remediation techniques prior to the movement of 13000 yards of contaminated soil so close to the populace.

Thank you,

RECEIVED

JAN 08 2009

CALIFORNIA
COASTAL COMMISSION

Elle Signature on File

POB 1086

Mendocino, CA 95460

RECEIVED

JAN 09 2009

CALIFORNIA
COASTAL COMMISSION

Jan. 1, 2009

From: Diara Duffey
Po Box 773
Albion, CA 95410

To: North Coast District office
California Coastal Commission
Bob Marrel, Dist. Manager
710 East St.
Eureka, CA 95501

Re: Permit # A1FTB05053A6

Dear Coastal Commission and Bob Marrel:

I am writing in opposition to the GP permit application # A1FTB05053A6.

I am opposed to this plan for the following reasons:

1. Capping toxic soil is not a Coastal Dependant Activity. The Coastal Commissions purpose to protect the coastal land and wild life from harm. There is no guarantee that there will not be run off from this plan that will do irreparable damage to our community, wildlife and ocean life. The life of the contaminants if left alone is much greater than the life of the liner making this an illogical plan.

2. As of yet there is not a full spectrum analysis of this site and more research

is needed at this time. There has not been adequate research in the area of remediation with mushrooms. Given the scope and viability of using mushroom, I believe that more research in this area is a safer more ecological plan.

3. My third concern is of Global Warming and rising sea levels. With this a real possibility it seems that piling and capping or burying toxic soil with only plastic to cover will lead to ecological disaster.

Please consider these issues when making your decision. Please consider the people in our community, the wildlife and ocean life when making your decision. Please consider requiring GP to "do the right thing" and safely clean this site.

Thank you.

A concerned citizen

Diana Duffey

Signature on File

Jacqueline Davidson
PO Box 1574
Mendocino, CA
95460
Jan. 2, 2009

North Coast District Office
Bob Merrill District Manager
710 E Street, Suite 200
Eureka, CA 95501

Re: Permit A-1-FTB-05-053-A6

RECEIVED

JAN 05 2009

CALIFORNIA
COASTAL COMMISSION

Dear Mr. Merrill,

As a resident of the Mendocino Coast I urge the Coastal Commission not to rush to approve capping the dioxin contaminated soil on the S P mill site.

With the problem of rising sea levels due to global warming, progressive countries are looking to bio-remediation techniques to solve these problems. The Coastal Commission should adopt this progressive stance by upholding the Adequate Exploration of Alternatives and supporting micro remediation instead of capping.

Yours truly,
Jac. Davidson
Signature on File Davidson

TO: North Coast District Office
California Coastal Commission
Bob Merrill, District Manager
710 East Street, suite 200
Eureka, CA 95501

FROM: Dr. Walt McKeown
940 B Ukiah Street
PO 592
Mendocino, CA 95460
707-937-3246

RECEIVED

JAN 05 2009

CALIFORNIA
COASTAL COMMISSION

RE: Pending Permit #A1FTB05053A6

January 2, 2009

Dear Mr. Merrill,

I urge you to deny approval for the above permit to cap dioxin contaminated soils in the California Coastal Zone. A sufficient full site review of the GP acreage has not been done. I urge funding for this review. For a tourist-based economy like we have on the Coast, a reputation for dioxin contaminated soils would be the kiss of death.

Thanks for considering this.

Dr. Walt McKeown


Signature on File


Signature on File 

Spring Senerchia
21410 Locust Street
Willits, CA 95490

January 2, 2009

North Coast District Office
Bob Merrill, District Manager
710 E Street, Suite 200
Eureka, CA 95501

To Bob Merrill and the California Coastal Commission:

This letter is requesting that the California Coastal Commissioners deny permit A-1-FTB-05-053-A6 to the applicants Georgia-Pacific Corporation.

Having grown up in Willits, I am a lifelong visitor to the pristine coastline to our west. This is a beautiful refuge for my family. I am very concerned about the capping of contaminated soil in the heart of Fort Bragg, located within the Coastal Zone. This will affect the health of safety of residents for generations to come, as well as the health of visitors. According the EPA and other agencies, there is no safe level of dioxin, and it's affects on pregnant women and children are not yet fully known. It is unacceptable to bury this sort of chemical beneath our town.

Our area relies heavily on the tourism generated by our coastline, and I believe having a toxic waste dump is not the attraction we'd like to feature. Instead, why not explore the groundbreaking mycoremediation work, for which a preliminary proposal has already been submitted. This would be a win-win solution – remediating the entire area (rather than just moving the toxins) while also attracting interest and visitors from around the globe to see our forward thinking solution.

The area proposed for the dumping is dangerously near the sea level for a town that regularly received Tsunami warnings and, like the rest of our coastlines, is threatened by the rising sea levels predicted to follow our current global warning.

Please consider alternatives to capping! At the very least I ask the California Coastal Commission to mandate that Georgia Pacific look for an alternative to remediate the dioxin-furan soil and under a deemed timeline, after which the capped contaminated soil would need to be remediated on site with an alternative solution or be removed.

Thank you very much for your consideration of this matter so crucial to our lives here,

Signature on File 

RECEIVED

JAN 07 2009

CALIFORNIA
COASTAL COMMISSION

41 of 210

Albion, 2-1-09

From : Annemarie Weibel

P.O. Box 566

Albion, CA 95410

aweibel@mcn.org

937-5575

To: Bob Merrill, District Manager
North Coast District Office, California Coastal Commission
710 East Street
Eureka CA, 95501

RECEIVED

JAN 07 2009

CALIFORNIA
COASTAL COMMISSION

This letter is in regards to permit #A1FTB05053A6.

It came to my attention that only 2 members of our coastal community attended your commission's last meeting. And it is at that meeting that GP's permit application to cap 13,000 cubic yards of contaminated soil on 1.5 acres on Cypress and Hwy 1 was to be decided on.

The function of the coastal commission I believe is to protect the coastal wildlife and ocean life.

This activity of capping contaminated soil on the coast is not a Coastal Dependant Activity.

There is no guarantee of run off as well as the fact that the liner will degrade before the soil is non-toxic.

There has not been adequate research done as to a full site evaluation.

Also, the possibilities of Mycoremediation have not been adequately researched.

More than White Rot Fungus can be used in this process and Paul Stamets has over 300 strains for potential use. Global Warming and rising sea levels make this a dangerous plan.

In the face of this reality I am urging you not to support the City of Fort Bragg by agreeing to a quick fix. For those interested in the long term future – harboring 13,000 cubic yards of "toxic" material is hardly a boost to the city's reputation or an inducement to eat seafood caught off our shores.

Please keep me posted as to future information. Thanks.

Sincerely, Annemarie Weibel

Signature on File

Signature on File

?

42 of 210

landowner, taxpayer, teacher, mother

January 2, 2009

Re: Application No. A-1-FTB-05-053-A6

California Coastal Commission
North Coast District Office
7101 Street, Ste. 200
Eureka, CA 95501

RECEIVED

JAN 07 2009

CALIFORNIA
COASTAL COMMISSION

Re: Application No. A-1-FTB-05-053-A6

Dear Executive Director, and Commissioners,

I live on the Coast and am writing to ask you to reconsider certain parts of the the Staff Report recommendations for Application No. A-1-FTB-05-053-A6.

First, there is an enormous amount of scientific data about the horrendous effects on humans, animals and birds, in short, on the entire ecosystem, from Dioxin exposure. There can be no misunderstanding about this.

In the LCP provisions, the language is vague and allows a great deal of latitude in interpretation. In the policies cited (OS-9.1 -- OS9.4) there are the recurring words, "minimize" and "to the extent feasible." Ex: Policy OS-92: "Minimize Increases in Stormwater Runoff. Development shall be designed and managed to minimize post-project increases in stormwater runoff volume and peak runoff rate, to the extent feasible, to avoid adverse impacts to coastal waters." "Minimize" isn't good enough; "to the extent feasible" isn't good enough. Considering the reality of Dioxin's pernicious effects, the Commission needs to take another look at this issue. I don't see any real protection for the ecosystem in the Staff report.

Second, there will be an enormous amount of work and monitoring required to simply preserve the Dioxin-laden soil. At the end of the life span of the containment structure (I believe it's 30 years), there will still be Dioxin; nothing will have been accomplished except for exposing the water underground and the ecosystem of the Ocean itself through deterioration and leakage. What if there is an earthquake? I don't have a fault map of the area, but I do know that it is in the San Andreas fault zone. Since the coast is riddled with faults, I am certain that there are numerous faults, some like the previously-unknown fault in the Santa Cruz mountains which created the devastating 1989 Loma Prieta earthquake. This is not addressed in the permit application. There is no way that the safety of the containment can be assured.

In 1961, the citizens of Bodega Bay, with the help of others, including Geologists, stopped the Pacific Gas and Electric Company from building an atomic reactor in the coastal community of Bodega Bay. The impetus was that the reactor would have been a time bomb, because of the potential for earthquakes. This place is now the site of the Bodega Marine Laboratory. I believe the current permit No. A-1-FTB-05-053-A6 as recommended by the Staff will create a time bomb.

I hope that our Coastal commission will allow even more time to be spent in serious consideration of other methods. There is promising ongoing research in many countries including ours, on bioremediation for Dioxin. Please have Georgia Pacific live up to it's publicly stated promise to wait until the results of the bench test are in. The containment and capping should be done with the additional requirement that should the bench test prove unsuccessful, the matter will be reopened in 5 years in the light of developing detoxifying technology. This is so important. The time to make the serious decisions is before the disaster. History tells us that.

Sincerely,

Signature on File



Gail Hamilton
PO Box 455
Gualala, CA 95445
707 894-3807

RECEIVED

JAN 07 2009

CALIFORNIA
COASTAL COMMISSION

Jan 2, 2009

TO: Coastal Commission
North Coast Dist office

RE: A1FTB05053 A6

Dear commissioners;

I have lived along the Mendocino Coast for 30 years. I am concerned about Georgia Pacific's Plan to cap it's toxic waste along the Coastal Bluffs of Fort Bragg. Everyone I talk to, is opposed to this.

The following reasons were discussed:

1. Coastal Bluffs are unstable for capping. It's a natural process for erosion to eventually take the bluffs away. Eventually the toxic soil would be in the ocean.

2. Sea levels are rising already due to global warming. Again — nothing should be capped along the coast!

3 - Capping is not really a solution to toxic waste. The preference & only real solution is to neutralize it.

4 - Micro remediation is a true solution & we should use it instead.

5 - California could and should be the world leader in using this new science to neutralize toxins — NO need to move to anywhere. NO need to care take

or monitor them for years on end.

6. Eventually the problem would arise again, capping is just a bandaid. Even if micro remediation is not used, capping is not the answer.

Please deny Georgia Pacific's permit to cap on "ANY" coastline.

We appreciate your time
in reviewing
these reasons
of opposition.

Sincerely,

Ta Signature on File *W*
Cactus Foods Vending
PO Box 1059
Pt. Arena, Calif
95468

January 2, 2009

RE: PERMIT A-1-FTB-05-053-A6

LIBERTY'S
KIDS
EST. 1776

Dear Coastal Commissioners,

PLEASE DENY The permit
A-1-FTB-05-053-A6 to
Georgia Pacific Corporation.

Many many people in our town
and outlying areas are worried
about contaminated soil in the
center of our major coastal town.

Evidently, storing toxic soil is
NOT a Coastal Dependent Activity.

The site is NOT necessarily stable -
earthquakes, tsunami or even
higher sea levels could disturb it.

These chemicals ARE very toxic.
NO CAPPING HERE. Don't allow this.
IF it is temporary, give us a time-line
and figure something out better, such as
myco-remediation. PLEASE please give
this a chance - new ideas for our health

Thank You

Hyla Bolsta
27760 N. Hwy 1
Fort Bragg CA
95437

email: hylajack@mcn.org

RECEIVED

JAN 07 2009

CALIFORNIA
COASTAL COMMISSION

RECEIVED

1-2-09

JAN 08 2009

~~MENDOCINO~~ OF THE CALIF
COASTAL COMMISSION
COASTAL COMM.

I'm writing to express my concern regarding pending permit # A1FTBOSOS3A6. As a long time Mendocino Coast resident, I know how fragile the coastal environment is. I believe further study is needed concerning the issues of longevity of capping materials, funding for testing, and especially investigation of alternatives to capping such as bioremediation and myco-remediation. Even though there is great pressure to push this capping plan forward, I hope you will at least postpone your decision until adequate studies can be done.



Mr. Karl Schoen
P.O. Box 361
Mendocino, CA 95460

THANK YOU!
KARL SCHOEN
1 1

Signature on File

January 2, 2009

CDP A-1-PTB-01-053-A6
DENY

North Coast District Office
Robert Merrill, District Manager
710 E Street, Suite 200
Eureka, CA 95501

RECEIVED

JAN 09 2009

CALIFORNIA
COASTAL COMMISSION

Dear Mr. Merrill,

I am writing to ask the Coastal Commission to DENY the application for a CDP that permits containment and capping of dioxin and furan contaminated soils at the Georgia-Pacific Corporation mill site in Ft. Bragg. My reasons for opposing this application are itemized below.

• **Tsunamis and Rising Sea Levels**

The chosen site for the consolidation cell is located a few hundred yards from coastal bluffs buried 6 feet beneath the soil surface. The proposed containment and capping does not adequately address the hazards of tsunamis or rising sea levels resulting from climate change. Tsunami warnings are issued for the Ft. Bragg area on a regular basis.

• **No Safe Levels of Dioxin**

Dioxins and furans are some of the most toxic chemicals known to science. A draft report released for public comment in September 1994 by the US Environmental Protection Agency clearly describes dioxin as a serious public health threat. The public health impact of dioxin may rival the impact that DDT had on public health in the 1960's. According to the EPA report, not only does there appear to be no "safe" level of exposure to dioxin, but levels of dioxin and dioxin-like chemicals have been found in the general US population that are "at or near levels associated with adverse health effects."

The International Agency for Research on Cancer (IARC) -- part of the World Health Organization -- published their research into dioxins and furans and announced on February 14, 1997, that the most potent dioxin, 2,3,7,8-TCDD, is now considered a Group 1 carcinogen, meaning a "known human carcinogen."

Also, in January 2001, the U.S. National Toxicology Program upgraded 2,3,7,8-TCDD from "Reasonably Anticipated to be a Human Carcinogen" to "Known to be a Human Carcinogen." See

their reports on dioxins and furans from their most recent 11th Report on Carcinogens.

Finally, a 2003 re-analysis of the cancer risk from dioxin reaffirmed that there is no known "safe dose" or "threshold" below which dioxin will not cause cancer.

A July 2002 study shows dioxin to be related to increased incidences of breast cancer.

- **Capping Sets an Undesirable Precedent**

The 13,000 cy of contaminated soil identified in the application is not the only location contaminated at the mill site. Capping will set a precedent for capping other dioxin-contaminated soil at this site and other sites within the Coastal Zone.

From a letter June 2006 from Environmental Consultants Fugro West:

On June 6, 2006, the Georgia-Pacific Investigation Team provided Fugro West, Inc., and SLR International Corp with an update of recent investigation findings. Summary information included results of dioxin analyses conducted on a total of 37 samples. In consideration of an upcoming 4th of July fireworks event, this memorandum focuses on the dioxin findings.

Analyses detected dioxin concentrations in three types of media at the site, including:

- Ash stockpiles - approximately 3,000 cubic yards of ash located in the eastern portion of Area 7,
- Soil - primarily subsurface soil located at depths of 2 to 9.5 feet with visible indications of ash in Areas 8 and 10. and
- Sediment - from various ponds locations at depths ranging from 0 to 14 feet below the pond.

This is just one report. To date, there are even more findings of dioxin contaminated soil. The full site characterization is still underway but results to date can be viewed on the DTSC website: <http://www.dtsc.ca.gov/>

- **Fungicide Burned with Redwood Bark**

The redwood bark burned in the Power House was sprayed with the fungicide Pentachloropnenal. When burned at a low temperature that fungicide creates large molecule dioxin. As a result, the fly ash that has contaminated the mill site soil is not, as Chip Hillardes said at the December 12, 2008 California Coastal Commission hearing, "like fly ash you find in your fire place."

There have also been numerous reports from ex-employees of G-P of toxic waste materials being burned in the Power House, such as contaminated diesel oil sprayed on the bark to help it burn.

- **Feasible Myco-Remediation Alternatives Now Available**

Two proposals to remediate the soils, sediment and ash at the G-P mill site have been submitted by NewFields Laboratory to Georgia-Pacific Corporation. Both proposals utilize the latest in mycoremediation technologies, and updates will be available in early February 2009.

- **Temporary Capping ONLY.**

We ask the California Coastal Commission to allow temporary capping only. This will enable Georgia-Pacific Corporation to further investigate on site remediation methods, including the promision new myco-remediation technologies.

Should on site remediation fail to achieve the Residential Primary Remediation Goal (PRG) of 3.9 pg/g of dioxin equivalents (TEQ), the contaminated materials should be removed from the mill site and transported to an approved disposal facility.

- **Applicant Should Complete the Full Site Characterization**

The Department of Toxic Substances Control reports that a complete investigation for a full mill site is currently underway. A complete CDP application should include the results of that investigation.

- **Bench Test Negotiations Currently Underway**

Myco-remediation Bench Test negotiations are currently underway with NewFields Laboratory and G-P. Dr. Jack Word, who will oversee the bench test, is currently working on the third and final revision of a proposal for Bench Testing the remediation of 10kg of contaminated soil from the G-P millsite. Paul Stamets of FungiPerfecti and Dr. Jack Word are proposing the use of 20 possible samples per fungal species with treatment during a 12-week test period.

A complete application should include the results of those proposed bench tests.

Because the application fails to address adequacy of containment to resist tsunamis and sea level rise, or to consider the latest in situ remediation methods, please DENY application A-1-FTB-05-053-A6.

Thank you for considering my views regarding this project.

Si  Signature on File
 Margaret Herbelin
ORCA Liaison-Humboldt County

North Coast District Office,
California Coastal Commission,
Bob Merrill, District Manager,
710 East St., Eureka, CA. 95501

RE: permit #A1FTB05053A6

Dear Mr. Merrill,

January 2, 2009

Please deny the application from Georgia Pacific to cap 13,000 cubic yards of contaminated soil on 1.5 acres on Cypress and Hwy 1.

This activity of capping contaminated soil on the coast is not a Coastal Dependant Activity. The function of the coastal commission is to protect the coastal wildlife and ocean life. There is no guarantee of proper run off as well as the fact the liner will degrade before the soil is non-toxic.

There has not been adequate research done as to a full site evaluation. Also, the possibilities of Mycro-mediation has not been adequately researched.

Global Warming and rising sea levels make this a dangerous plan in the face of this reality.

I urge you in the strongest possible terms, to prevent this dangerous solution to a difficult problem, one that I am sure can be dealt with properly.

Thank You,

RECEIVED

JAN 14 2009

CALIFORNIA
COASTAL COMMISSION

Thomas E Brown
PO Box 2541
Mendocino, Ca
95460

707-937-3081

January 5.07

RECEIVED

JAN 05 2009

CALIFORNIA
COASTAL COMMISSION

Dear Mr. Merrill,

I'm writing you this letter as a very concerned mother of two small children, a professional in the Mendocino County^{area} and a very concerned Earth conscious human. I've spent over 10 years teaching environmental education to ~~3~~ K-6th graders and putting a lid on our toxins is definitely not the answer to such a terrible problem. Would you like your children or grandchildren playing on a new recreation area that has toxic waste buried all over it?

Please pursue alternative choices in how to deal with such an ominous situation. I'm sure you realize that capping the soil doesn't prevent toxins from leaching into the ocean or the soil. It is irresponsible to allow G.P. the less costly option in this delicate Coastal area where earthquakes, tsunamis, global warming and definite migration such even up to these events would transport the toxins into the ocean & into Fort Bragg environment.

54 of 210

Phyto. and Bioremediation would create a new precedent by dealing with toxins and bring eco tourism to our County.

The future generations are hopeful of your wise decisions. Sincerely,

Amy Arkman
P.O. Box 265

amy@tapestryf.s.org
(707) 671-2292

RECEIVED

JAN 15 2009

CALIFORNIA
COASTAL COMMISSION

January 3, 09

Dear Mr. Merrill,

I am writing as a very concerned citizen of Mendocino County. I often go to Fort Bragg to enjoy its coastal beauty.

Please pursue alternative methods of dealing with the dioxins and topins at the GP site.

Mycro-and bioremediation seems to me to be the sane way to attack this terrible environmental problem.

Our future generations are in your hands.

Thank you

Sincerely

M. Signature on File nan

Re: Permit # A 1 FTB 05053A 6

RECEIVED

JAN 05 2009

January 3, 2009

CALIFORNIA
COASTAL COMMISSION

Dear Coastal Commissioners,

As a longtime resident on the Mendocino Coast, I am writing in opposition to Georgia Pacific's plan to contain and cap the mill site's accumulation of toxic waste. This scheme is a sketchy, hurried, cynical attempt to sweep serious threats to air quality, water purity, & ocean food resources under an already filthy rug. The Fort Bragg City Council's approval merely reflects an irresponsible short-sightedness.

The proposed containment site is too close to residences, businesses, and tourist attractions around Ft Bragg; strong winds and human and animal foot traffic will inevitably spread toxins into surrounding areas.

Numerous small waterways will inevitably wash contaminants into groundwater and ocean. Offshore of Ft Bragg, upwelling Ocean waters are the source of much of the planet's food. Fishing, crabbing, and seaweed harvesting will be questionable into the far future at a time of diminishing food stocks for growing populations.

The coast at Fort Bragg is also in line for major earthquakes, tsunamis, and severe storms. Rising sea levels due to climate change can reasonably be expected.

I question the adequacy and durability of the materials under consideration to leaklessly sequester the ultra-toxic, persistent dioxins and furans throughout the waste.

There has been inadequate exploration of alternatives to capping or trucking. Evidence is building for bioremediation of toxic waste. A group of local citizens are gathering hard evidence and educating themselves and the public re mycoremediation. This, like any "soft path" to a solution, deserves consideration and encouragement.

I urge you, as protectors and defenders of the invaluable Edge of the Western World, to deny the permit. While funding for all oversight dwindles, I urge you to act immediately and decisively.+

Sr

Signature on File



Liz Helenchild
Box 1276
Mendocino CA 95460

RECEIVED

JAN 07 2009

CALIFORNIA
COASTAL COMMISSION

To: Bob Merril
North Coast District Office
California Coastal Commission
710 East St., Suite 200
Eureka, CA 95501

Re: AIFTB05053A6

I am a resident of Mendocino County
and a recreational fisherman

Do not issue a permit to
Georgia Pacific / Coca Cola to
cap the dioxins on the old Georgia
Pacific millsite. Try mycoremed-
iation instead, which can break
down the dioxins and render them
harmless.

This is especially important in
Fort Bragg, because we have
here one of the richest fisheries
in the world. A great upwelling
exists here, one of only four
in the world.

57 of 210

The dioxins, if capped, will

sooner or later show up in the
seafood. It may take several
generations but it will wash into
the ocean and ruin a major food
supply of future generations.

1-03-09 K D PRICE

Signature on File

Signature on File)

RECEIVED

JAN 07 2009

CALIFORNIA
COASTAL COMMISSION

1/03/09

To:

Bob Merrill

North Coast District Office

California Coastal Commission

210 East St., Suite 200

Eureka CA 95501

From:

North Coast Consumers Alliance

PO Box 351

Redwood Valley CA 95470

Re: AIFTB05053AB

I am a resident of Mendocino County
No permit should be issued to
Georgia Pacific/Coca Cola to cap
the toxins on the mill site. Instead,
consider the feasibility of bioremediation
by mycorizal processes. Very
valuable work has been done
cleaning up toxics by Paul Starmets,
using Fungi.

Best to remediate than cap.
Best to break down the toxics than
bury them. Whatever we cap today will
still be there for our grandchildren.
Whatever we do to the earth we do to
ourselves.

Jan. 03, 09

TO: North Coast District office
Coastal Commission of California
Bob Mirrell
710 East St., Suite 200
Eureka, CA 95501

RECEIVED

JAN 07 2009

CALIFORNIA
COASTAL COMMISSION

RE: AIFTB05053A6

FROM: Dave Groezinger

As a resident of Mendocino County, an architect, and active community leader I believe it is wrong to provide a permit to cap the soil from the Georgia Pacific site.

This temporary solution allows the Coke Co. to once again avoid the cost of their polluting behavior. It will be the people of the community who will end up bearing the burden. If this is not enough, then think of the Coast and the up-welling which will end up contaminated destroying any future for the economy of the coast.

60 of 210

There needs to be a scientific solution

not a political solution. There is the potential for Paul Stimits Microremediation to clear up the pollutants making this project a pilot project for the world to watch. We must find solutions which takes us to a new paradigm of co existing with all living things.

Without the essential foods and abundance from the Ocean cared for, we destroy the future for all of us. The Coastal Commission must protect the coast and not ^{choose to} protect the corporate profit instead.

We must be good stewards of the Earth. It's going to take all of us, working together. The only way we are going to get our coast clean is by sending a powerful message to our corporations and government.

Signature

Signature
Signature on File

Signature

Jan. 03, 09

To: No. Coast Dist. off.

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JAN 07 2009

CALIFORNIA
COASTAL COMMISSION

Bob Mirvel
Calif. Coastal Commission

RE: AIFTB05053A6

From: Tyaga Platt

I am a resident of Mendocino County. A permit to cap the dioxin soils from the Georgia Pacific-Coke site in Fort Bragg should not be allowed.

At this point using micro remediation to actual clean-up the waste is more appropriate. If this soil is only capped we leave the same problem just putting the soil elsewhere for our children to deal with. The corporations responsible for the waste needs to be held to cleaning-up not just postponing the issue.

If capped rising coastal waters could release this poison into our pristine coastal upwelling which feeds millions and provides an eco economy. -

From: Jennifer Kreger MD
480 Main Street, Box 627
Mendocino, CA 95460

To: Bob Merrill, District Manager
North Coast District Office, California Coastal Commission
710 E. St., Suite 200
Eureka, CA 95501

January 3, 2009

Dear Mr. Merrill:

I am writing to ask you to deny permit A-1-FTB-05-053-A6 to Georgia-Pacific Corporation.

Rather than settle for permanent capping of toxic materials in the middle of the headlands of Fort Bragg, I suggest a temporary capping. Temporary capping should take place to buy time for technology to catch up to the magnitude of the problem facing this site.

Time and trial and error will show whether, and to what degree, mycoremediation can allow us to undo the harm we have already done to our local coastal area. Once that becomes clear, we can decide whether more-permanent capping or transport would be a more suitable destiny for any toxins that may remain unremediable. From what I have read about humans' ability to train fungi to clean up various chemical mistakes, it sounds like the "after mycoremediation" pile will be a great deal smaller than the "before mycoremediation" pile of toxic waste.

Mycoremediation bench test negotiations are currently underway between NewFields laboratory and Georgia Pacific. As the coalition of those who must live here with the consequences, those who try to heal the medical consequences of our self-poisonings, and those who are empowered to insist on the protection of our shoreline, let's work together to set things up to go as smoothly as possible for the fungi and their human colleagues.

Let's not settle for sweeping our mistakes under a cement carpet, but support the work of permanently turning our injured and poisoned dirt into something harmless and then into real soil that can thrive and sustain life.

Thank you for all your efforts in the preservation of California's coastal beauty.

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JAN 07 2009
CALIFORNIA
COASTAL COMMISSION

Signature on File

Jennifer Kreger MD

Cally Dym
Little River Inn
Little River, CA 95456

California Coastal Commission
North Coast District Office
ATTN: Bob Merrill
RE: GP Permit No. A-1-FTB-05-53-A6
710 East Street, Suite 200
Eureka, CA 95501

January 3, 2009

Dear Mr. Merrill,

As part of the family that owns Little River Inn, a coastal business dependent on Mendocino County's tourist economy, I look forward to the day when the old GP mill site can be developed. Selfishly, I would be thrilled to see some development aimed towards attracting tourists. Any well thought out plan will benefit our community, be it open-space, high and low income housing, a tourist attraction, or a combination thereof.

However, no such benefit can outweigh the safety and well-being of the people that live here. Although digging up the toxic soil and burying it elsewhere is a quick means to a desirable end, any option that sacrifices the health of our community should only be considered as a last resort. It is my understanding that there may be equally effective, although slower, options available. I ask that the California Coastal Commission deny permits to dig up toxic soil on the GP mill site until all other safer options have been proven unfeasible.

Sincerely,

Signature on File

Cally Dym 
5th Generation Owner and General Manager
Little River Inn

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JAN 07 2009
CALIFORNIA
COASTAL COMMISSION

January 3, 2009

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JAN 07 2009

CALIFORNIA
COASTAL COMMISSION

to Whom It May Concern:

Reference: Permit # AIFTR05053A6

The purpose of this letter is to request you to Deny a Permit to Dump Toxic Waste from the old GP Site in South Fort Bragg, CA.

There has not been adequate exploration of alternatives to this toxic waste removal idea. Please do not allow this waste to be dumped in this site, close to the ocean.

I am concerned about Global Warming and rising sea levels. This could very well impact the waste site in question.

Thank you for your attention to this very important matter.

Signature on File

P.O. Box 1176
Willits, CA 95490

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JAN 07 2009

CALIFORNIA
COASTAL COMMISSION

Richard and Jeanne Jackson
Post Office Box 1029
Gualala, Ca 95445
Phone 707 884-1760

January 3, 2009

North Coast District Office
Robert Merrill, District Manager
710 E Street, Suite 200
Eureka, CA 95501

Re: CDP A-1-FTP-05-053-A6

DENY

Dear Mr. Merrill,

We are very concerned about the precedent it will set in the Coastal Zone if Georgia Pacific is allowed to contain and cap thousands of yards of soil containing dioxin. This certainly is not a coastal dependent activity. If toxic wastes are allowed to remain, we wonder what might happen in an earthquake, with rising sea levels and/or bluff erosion. The site picked for the contaminated soil is only a few hundred yards from the coastal bluffs. As there appears to be no safe level of exposure to dioxin, we believe alternatives should be considered. The county of Mendocino has been a leader in the green movement. We ask that a promising new technology be explored. That alternative is mycoremediation. Using mushroom mycelium to detoxify wastes should be thoroughly investigated. The Bench Test with NewFields Laboratory should be allowed to happen. This beautiful 434 acres, which will be enjoyed by generations to come, deserves to be restored to its pristine state.

Sincerely,

Signature on File

=

Signature on File

(Richard Jackson) (Jeanne Jackson)

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JAN 07 2009

CALIFORNIA
COASTAL COMMISSION

January 3, 2009

Dear District Manager Merrill,

Re: permit # A17TB 050 53A6

- I am opposed to this application for a number of reasons -

1. The idea of this poisonous, contaminated soil being buried, without a site evaluation being done, is without merit. It should not be hurried through without adequate research being done.

2. Our coastal area is now quite reliant on tourism for its income, and this can be a big negative reason for people not to come here.

3. It is important to set an example of thorough research for future projects.

4. I am told that this capping contaminated soil, on the coast, is not a Coastal Dependent Activity.

5. The possibilities of Mycoremediation have not been explored enough.

To me this is yet another example of an outside company trying to act in a way that is bad and unhealthy for our community.

Please deny this application.

Thank you for your time.

Sincerely,

 Signature on File

North Coast District Office
California Coastal Commission
Bob Merrill, District Manager
710 East St.
Eureka CA 95501

RE: Permit #A1FTB05053A6

RECEIVED

January 3, 2009

JAN 07 2009

Dear Mr. Merrill:

CALIFORNIA
COASTAL COMMISSION

I have resided in Mendocino County for 35 years. Please do not threaten our coastal environment and economy by granting GP permission to cap 13,000 cubic yards of contaminated soil on 1.5 acres near Cypress St and Hwy 1 in Ft. Bragg.

Has the process of mycoremediation of this material been thoroughly researched? It *should be* before resorting to any other plan. Mycoremediation is a safe non-hazardous, non-toxic process which poses no future adverse effects to the environment. It has a strong record of effectiveness and was used successfully in the recent oil spill in the Bay Area.

If capped, this contaminated material poses numerous environmental hazards. There is no guarantee that the liner containing the material will not degrade before the soil becomes non-toxic. There is no guarantee that there will not be run-off of the toxic material. There is no guarantee that global warming and rising sea levels will not impact the material.

The health of our residents, and the environmental and economic health of our coast will be tremendously impacted by whatever decision is made about how to handle this contaminated material.

Please do not poison the Mendocino Coast.

Marcia Sloane
PO Box 366
Mendocino CA 95460

Signature on File *msl*

Mr. Bob Merrill, District Manager
North Coast District Office
710 E Street, Suite 200
Eureka, CA 95501
January 3, 2009
Dear Mr. Merrill,

I'm writing this letter to urge the California Coastal Commission to deny permit # A-1-FTB-05-053-A6 to the Georgia Pacific Corporation. Putting 13,000 cubic yards of contaminated soil on 1.5 acres of land in the heart of Fort Bragg AND located in the Coastal Zone, is, at the very least, illegal, and morally speaking, absolutely corrupt. For a huge corporation, one of the largest and richest in the US, to not take responsibility for their OWN poisons, and to instead leave them in a coastal town, capped, is reprehensible!!

Some points: 1) The storing of toxic soil under the ground in the Coastal Zone is NOT a Coastal Dependent Activity as defined in the California Coastal Act.

2) Rising sea levels - The site for the consolidation cell that has been chosen, is only a few hundred yards from the coastal bluff, buried ONLY 6 feet beneath the soil surface. In Fort Bragg, the residents receive Tsunami warnings on a regular basis, as well as the great concern over rising sea levels!

3) No safe levels of Dioxin according to EPA and other agencies. A draft report released to the public in September, 1994 by the US Environmental Protection Agency, clearly describes dioxins as a serious public health threat.

4) Capping here in Fort Bragg will set an extremely dangerous precedent for more capping in the future, not only on the mill site, but for other rich - "who gives-a-sh-t" companies to do the same!!!

5) The fungicide Pentachlorophenol, as well as contaminated diesel oil, was sprayed on the redwood bark burned at the mill site. When burned at a low temperature, the fungicide creates large molecule dioxin.

6) We ask that the California Coastal Commission mandate that Georgia Pacific look for an alternative to remediate the dioxin-furan soil, and the capped contaminated soil would need to be remediated on site with the alternative, or removed.

Does Georgia Pacific say they don't have the funds, sources available for searching out alternatives????!! A company with their wealth, and seemingly, power???!! I guess the CEO's, big whigs of GP don't live in the Fort Bragg area, so why the heck should they care what happens with their poisoned land, and what it could do to damage children now, and all future generations?

7) Time Line - There has been no FULL SITE Characterization to date. The Department of Toxic Substances Control reports that a site investigation is underway.

8) ALTERNATIVES - Myco-remediation Bench Test negotiations are underway with New Fields Laboratory and GP Dr. Jack Word. Stamets and Dr. Word are proposing the use of 20 possible samples per fungal species/treatment during a 12 week test period.

PLEASE give it a chance to happen!

Thank you for your attention.

Signature on File

Lorraine Lepaue
PO Box 1785
Mendocino, CA 95460
(707)937-3243

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JAN 12 2009

CALIFORNIA
COASTAL COMMISSION

Karen Rakofsky
PO Box 21
Albion, CA 95410
January 3, 2009

North Coast District Office, California Coastal Commission
Bob Merrill, District Manager
710 East St., Eureka, CA. 95501

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JAN 15 2009

CALIFORNIA
COASTAL COMMISSION

RE: permit #A1FTB05053A6

I am very concerned about Georgia Pacific's permit application to cap 13,000 cubic yards of contaminated soil on 1.5 acres on Cypress and Hwy. 1 in Fort Bragg.

My understanding is that the Coastal Commission is charged with protecting the coastal wildlife and ocean life. Capping contaminated soil on the coast is not a Coastal Dependent Activity. Scientists cannot be sure that the liner will stay intact. It could degrade before the soil is nontoxic. Additionally, there could be run off.

There has not been adequate research done as to a full site evaluation. The idea of Mycoremediation is exciting and could aid in the solution of this problem. Unfortunately, the Coastal Commission has not adequately researched this option. More than White Rot Fungus can be used in this process and Paul Stammets has over 300 strains for potential use.

Global Warming and rising sea levels make capping a dangerous plan in the face of this reality.

Thank you for your consideration.

Sincerely,

Signature on File

Karen Rakofsky

Rhoda Teplow Presents

Bob Merrill
District Manager
California Coastal Commission
710 E. St, Suite 200
Eureka CA 95501

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JAN 07 2009

CALIFORNIA
COASTAL COMMISSION

RE: Permit A-1-FTB-05-053-A6

January 4, 2009

Dear Mr. Merrill,

I think it is a terrible idea for Georgia Pacific to cap the toxic soil that is present in the heart of Fort Bragg. This could leave a dangerous legacy for generations to come and is not an activity which was deemed by the California Coastal Act. Capping toxic soil 6 feet under ground a few hundred yards from the cliffs is a very bad idea since our cliffs are very unstable. With Global Warming the sea will rise and it will be a threat to the capped off site especially since we have had Tsunami warnings before. Having these toxins around is really bad for tourism, bad for the environment and bad for our local public health.

I would much prefer that those involved try myco-remediation and have fungal species treat the dioxins and furans in situ. They are already undergoing bench tests and I think we should wait until those tests are done before we give up and give in to capping off one and a half acres.

Of course another solution would be to remove the toxins and take them out of Fort Bragg, but that would be very evil to dump our toxins on another community. I would not like that to happen. I would like Fort Bragg to be a model city and to have other communities come and visit our dumpsite and see how the myco-remediation is working. That scientific demonstration would attract tourists and help our economy instead of endanger us with capping off a toxic threat.

Signature on File

Rhoda Teplow

72 of 210

email ▶ rteplow@mcn.org
PHONE/FAX ▶ 707 • 964 ▶ ARTS (2787)
POST OFFICE BOX 453 ▶ MENDOCINO, CA 95460

1-4-09

In regards to Georgia-Pacific permit
 no A-1-FTB-05-03-A6 I am writing
 to express my objection to the burial
 of toxic waste in the Coastal zone
 of California. The potential environmental
 impacts dictate that this toxic mess be
 handled in a more responsible manner.
 The potential for devastation due to the
 buried soil being unleashed by tsunamis,
 earthquake or rising ocean waters is a
 real threat. The Coastal Commission is
 charged with protecting our coastline from
 these kinds of dangers ^{and} it is paramount to
 the existence of the agency. Please do not
 grant GP the right to bury this toxic mess
anywhere in your jurisdiction.

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JAN 07 2009

CALIFORNIA
COASTAL COMMISSION

Sincerely,

Signature on File

Mendocino, CA

January 4, 2009

CDP A-1-FTB-05-053-A6

DENY

North Coast District Office

Robert Merrill, District Manager
710 E Street, Suite 200
Eureka, CA 95501

Dear Mr. Merrill,

I urge the Coastal Commission to deny the current request for containment and capping of dioxin-laden soil on a site within the coastal zone. The new development of the Fort Bragg mill site should be based on a complete cleanup of the prior industrial use. To bury the dioxin on-site would only perpetuate the contamination of an extremely important shoreline property, nothing less than the entire waterfront of the largest city on the Marin-Sonoma-Mendocino coast.

Fort Bragg, which now depends on tourism, needs to have this property brought up to contemporary standards of healthy environment, not repurposed as a toxic waste dump. There is no reason to allow this dump in the coastal zone, as there is plenty of company-owned property outside of the zone. If there is good reason to bury and cap the contaminated soil, it should be placed in an unpopulated area outside of the coastal zone and the city of Fort Bragg. If the method is indeed benign, there should be no problem locating it elsewhere in the county.

Please urge the Commissioners to protect the integrity of the coastal zone and deny the current plan to bury and cap the soil on-site.

Sincerely,

Signature on File

Rixanne Wehren
27401 Albion Ridge Rd.
Albion, CA 95410

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JAN 07 2009

CALIFORNIA
COASTAL COMMISSION

Pg. 1

From: Debra Scott <waterbird@mcn.org>
Subject: permit A-1-FTB-05-053-A6
Date: January 4, 2009 10:13:59 PM PST



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JAN 07 2009

CALIFORNIA
COASTAL COMMISSION

to:

All members of concern at the California Coastal Commission

i am writing regarding my concerns re:A-1-FTB-05-053-A6.

i have been a coastal resident since 1984, and have been an active participant in the public process regarding the cleanup of the Georgia Pacific, now Koch industries site, since the first North Coast action public meetings, over 6 years ago.

i welcomed D.T.S.C. as the lead agency for the clean up of this complex 480+ acre site, and have been in dialogue with the revolving staff and especially appreciate the dedication of those who have remained on the project, thru the many transitions.

i have grave concerns regarding the rush to contain this portion of known toxins, in such a manner, at this location.

i see that all of these actions are premature in the rush to secure coastal trail access,[a desirable end, indeed.]

Full site characterization of this extensive coastal industrial land has been the focus of citizen groups from the onset.

this has not been accomplished.

the known toxins that are designated for "capping" are only those known to exist within the blueprint for the coastal trail. This does not address the surrounding untested soils adjacent to this margin of land.

as i understand it, the jurisdiction of the coastal commission is concerned with coastal dependent activity.

the granting or a permit to "cap" known carcinogens in the heart of a coastal town, on a major earth quake fault, in a sunami zone, amidst one of the four greatest upwellings of our oceanic world, deserves fierce inquiry.

having attended D.T.S.C. meetings where toxicologists, expert in C.E.Q.A. law, raised concerns regarding the liner of the proposed capping site,i as a student of toxics, and a public radio host, covering these issues, have serious concerns about the properties of the proposed liner, relative to the unique stressers of our wild and beautiful coast.

we are given great assurances about the lifetime of this capping liner and yet this

is all projection. This material has existed for far less time than its optimistic proponents are projecting it's capacity to safely isolate the toxic contents.

in reality, under these conditions of nature, the capacity of the liner is an unknown.

Particularly given that the liner will be seamed with a simple stitching method, which when the public was shown samples, [from D.T.S.C.] hardly comforted my concerns re: the liner's ability to withstand earthquakes, sunamis, soil microbes, and not to under estimate our gopher population.

given the duration of containment required for the toxins at stake, will such containment protect the public, especially pregnant women and children, with potential daily exposure, as well as the visitors that are so sought after, by the tourism economy?

and for how long?

is this a coastal dependent activity?

the site is a unique ecology of the interface of ground water, aquifers and the intertidal zone.

are our precious coastal waters sufficiently protected?

as regards the site as a whole, i'd like to express concern about the overall level of clean up.

many of us, who have followed this crucial land use issue over the years are advocating for the highest standard of clean up. Long term land use remains unknown. we also strongly advocated to not have the clean up be done piecemeal, as the risk to those accessing the land, during future cleanup could be exposed unnecessary to elevated risks.

regarding the proposed cap liner, such maleable, hydrocarbon based materials, are by nature high in pphalates. we already have land contaminated with substances [dioxins], that are known endocrine disruptors, at P.P.T.

do we need to add insult to injury by importing more potential endocrine disruptors that may or may not successfully contain the existing carcinogens and other toxins?

is it necessary to locate this long term toxic site next to Highway 1, at the center of our coastal hub and port?

i urge you to slow this process down and consider all alternatives.

Mendocino has passed the Precautionary Principle, as a guideline to decision making. Part of this is adequately exploring alternatives.

Adequate review of alternatives has not been completed.

as a person who was quoted in the New York Times, and as a student of Paul Stamets, i have been a representative of the community at meetings investigating

Pg 3

the possibility of a bench test of mycoremediation technologies for remediation of the toxins.

this innovative technology goes beyond the research on White Rot Funghi into a far more complex and specific approach.

This requires adequate funding.

Thank you all, for your time and attention.

i request that you do not approve this "capping" permit, A-1-FTB-05-053-A6, until such time as further scientific analysis has been completed and supports this choice and you are able to vote with assurance that you are protecting the health and D.N.A. of future generations.

THANK YOU

Debra scott

Box 1394 Mendocino, Ca.

95460

January 4, 2009

North Coast District Office
Robert Merrill, District Manager
710 E Street, Suite 200
Eureka, CA 95501

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JAN 07 2008

CALIFORNIA
COASTAL COMMISSION

Re: CDP A-1-FTP-05-053-A6 DENY

Dear Mr. Merrill:

We are writing about this item which we understand will come before the Coastal Commission in the February meeting. In reading over all the background information we understand that this is a very complex situation with no good alternatives and that in addition many of the proposed solutions are very costly.

Capping such toxic soil is a risky solution given the possibilities of earthquakes and tsunamis and will not permanently solve the problem. The staff report indicates that maintenance will be required. Staff shortages in the enforcement division make it unlikely that problems, if they did occur, could be addressed promptly.

The analysis in the staff report that concluded bioremediation would not be a good solution only examined white rot fungus studies. Given that capping will be costly and not without risk, it would seem that postponing a decision until other bioremediation alternatives can be studied would be wise, especially since a bench test for bioremediation has been proposed for the GP site.

We ask that final action be postponed until methods more appropriate for the Fort Bragg area can be considered. Since Coastal Conservancy trail projects are all on hold because of the state budget crisis, it would seem that this would give time to further study what could be the best solution.

Sincerely,

Signature on File



Signature on File



Mary Sue Ittner & Bob Rutemoeller
PO Box 587
Gualala, CA 95445

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JAN 07 2009

CALIFORNIA
COASTAL COMMISSION

January 4, 2009

Bob Merrill, District Manager
North Coast District Office
California Coastal Commission
710 East Street / Eureka, CA 95501

RE: Permit "A1FTB05053A6"

Dear Mr. Merrill:

Please forgive this late letter. It was my understanding that GP website contamination was going to be dealt with through myco-remediation, rather than capping. Don't know how I missed the word, but in any case I am writing to urge you to refuse GP's application to cap 13,000 cubic yards of contaminated soil. The Coastal Commission should be protecting coastal wildlife and ocean life, and there are no guarantees in the present plan regarding run-off. I understand there are also realistic concerns about liner degradation before the soil detoxifies.

I've also been informed that the full site evaluation has been inadequately researched, including the possibilities of myco-remediation.

It seems flat-out crazy to just "cover up" the toxic substances in this careless way and hope they'll go away.

Please, Mr. Merrill, do not allow our town to be subjected to this kind of pollution without fully exploring ecologically sound alternatives. It is not strictly speaking your job to protect tourism (which is bound to be affected), but it is your job to protect the cleanliness and integrity of the coast.

Sincerely yours,

Signature on File

Robert Ross / 30500 Pudding Creek Road / Fort Bragg, CA 95437

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JAN 07 2009

CALIFORNIA
COASTAL COMMISSION

Judith Edwards
PO Box 1187
Mendocino, CA 95460

California Coastal Commission
North Coast District Office
Bob Merrill District Manager
710 E Street
Eureka, CA 95501

Dear Coastal Commissioners,

I am writing concerning the clean up of the former Georgia Pacific mill site in Fort Bragg CA. The File number is A-1-FTB05-053-A6.

I live near Fort Bragg which is the largest town in this coastal area and our business center. GP was one of the largest employers on the coast but now we depend on tourism to a large extent for our livelihoods. I myself work for an Inn.

Visitors mainly come to our area to experience the ocean, forested parks and open spaces. I think that a lined and capped toxic site, in town right on the fragile ocean bluffs, would have a negative impact on tourism as well as the environment.

I think that the alternative of Myco Remediation (using mushrooms to clean up toxics) should be considered and if chosen funded sufficiently. From what I understand, new technical innovations have moved Myco Remediation further along than just 'White Rot Fungus' and is capable of breaking down Dioxins.

Successful Myco Remediation could put Fort Bragg on the map in a totally new and positive way and set a precedent for safe future Dioxin clean up.

Please consider this alternative.

Thank you,

Judith Edwards

Signature on File

v

California Coastal Commission
Bob Merrill, District Manager
710 East St. Eureka CA 95501

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JAN 07 2009

CALIFORNIA
COASTAL COMMISSION

January 4, 2009

RE: Permit #A1FTB05055A6

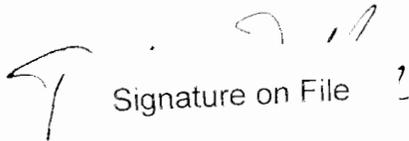
Dear Mr. Merrill:

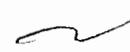
I am a resident of Mendocino and very dismayed that you would even consider granting GP permission to cap 13,000 cubic yards of contaminated soil near Cypress Street and Highway 1 in Ft. Bragg. This would be a grossly shortsighted action.

If you cap this contaminated material, you eliminate the opportunity to properly clean it up, and you exacerbate the potential environmental hazards. What if the liner containing the material degrades before the soil becomes non-toxic? How can you guarantee there will be no run-off of the toxic material?

The environmental and economic health of Fort Bragg and the Mendocino coast will be tremendously impacted by how we handle this contaminated material.

Why not try mycoremediation on this material first? What have you got to lose? Time? Money? Who are you working for? GP or the citizens of the area? Mycoremediation is a safe non-hazardous, non-toxic process that works. Try it first before sweeping the toxic dust under the rug.

 Signature on File


Todd Walton Box 366 Mendocino California 95460

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JAN 08 2009

CALIFORNIA
COASTAL COMMISSION

Samuel E. Senerchia
21410 Locust Street
Willits, CA 95490

January 4, 2009

North Coast District Office
Bob Merrill, District Manager
710 E Street, Suite 200
Eureka, CA 95501

To Bob Merrill and the California Coastal Commission:

This letter is requesting that the California Coastal Commissioners deny permit A-1-FTB-05-053-A6 to the applicants Georgia-Pacific Corporation.

Having grown up in Willits, I am a lifelong visitor to the pristine coastline to our coast. This is a beautiful refuge for my family. I am very concerned about the capping of contaminated soil in the heart of Fort Bragg, located within the Coastal Zone. This will affect the health and safety of residents for generations to come, as well as the health of visitors. According the EPA and other agencies, there is no safe level of dioxin, and it's affects on pregnant women and children are not yet fully known. It is unacceptable to bury this sort of chemical beneath one of our towns.

Our area relies heavily on the tourism generated by our coastline, and I believe having a toxic waste dump is not the attraction we'd like to feature. Instead, why not explore the groundbreaking mycoremediation work, for which a preliminary proposal has already been submitted. This would be a win-win solution – remediating the entire area (rather than just moving the toxins) while also attracting interest and visitors from around the globe to see our forward thinking solution.

The area proposed for the dumping is dangerously near the sea level for a town that regularly received Tsunami warnings and, like the rest of our coastlines, is threatened by the rising sea levels predicted to follow our current global warming, not to mention frequent heavy earthquake activity.

Please consider alternatives to capping! At the very least I ask the California Coastal Commission to mandate that Georgia Pacific look for an alternative to remediate the dioxin-furan soil and under a deemed timeline, after which the capped contaminated soil would need to be remediated on site with an alternative solution or be removed.

Thank you very much for your consideration of this matter so crucial to our lives here,

Samuel Senerchia

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JAN 07 2009

CALIFORNIA
COASTAL COMMISSION

P.O. Box 2465
Mendocino, CA 95460
January 5th, 2009.

California Coastal Commission
North Coast District Office
Attention: Bob Merrill
710 E. St., Suite 200
Eureka, CA 95501

permit # A1FTB05053A1

Dear Mr. Merrill,

We do not want toxics buried by Georgia Pacific Lumber at the Fort Bragg mill site's southern end. This is against coastal best interests and is not an activity we desire to practice here on the coast. Encouragement for more investigation and environmental study is needed. micro-remediation should be given a chance before another path is followed. Thank you for reading this and please help keep everyone's coast as pure and beautiful as possible. Everyone who frequents, living or visiting this area, the coast deserves a healthy environment to enjoy.

Sincerely,

Signature on File

(Kim Webster)



HOWARD ENNES

160 Woodland Drive, Fort Bragg, CA 95437

707-964-7860

Email: nsdusoir@mcn.org



RECEIVED From The Old Man

JAN 07 2009

January 5, 2009

CALIFORNIA
COASTAL COMMISSION

California Coastal Commission,
North Coast District Office
Bob Merrill, District Manager
710 E Street, Suite 200
Eureka, CA 95501

Re: Permit A-1-FTB-05-053

Dear Mr. Merrill:

On December 4 the enclosed letter was mailed to you. I have looked further into the circumstances and documentation and now wish to modify my statement with the following:

In all candor, I still have little confidence in Georgia Pacific-Koch Industries insofar as their actual motives may be. Certainly their goal is to dispose of the Georgia Pacific Millsite in Fort Bragg at a maximum profit as soon as possible. In light of their history, I cannot believe their interests are those of the community.

Nevertheless I am willing to credit them with a willingness, even grudgingly and as a calculated public relations and political move, to underwrite the effort to explore the potentialities of mycoremediation with fungi. The funding they offer is, of course, inadequate in light of the detailed proposals.

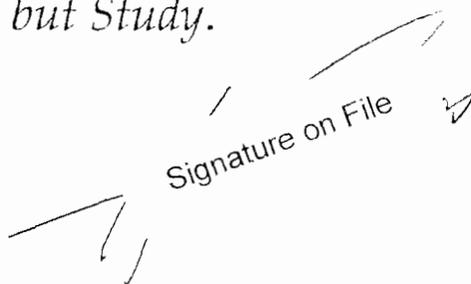
84 of 210

Consequently, I urge that the California Coastal Commission add a special condition to approval of the application to encapsulate the Coast Trail soil for a limited period and, concurrently require that Georgia Pacific adequately finance the study of fungi mycoremediation.

If the bench test and subsequent onsite studies prove that these brown fields can be cleaned up successfully, the potential is a re-vitalized coastal community, considerable enhancement of the value of the property for the economic benefit of GP-Koch and the Fort Bragg coastal community. Additionally, this project might reveal an important scientific methodology for brown field contamination control.

Even if the studies do not pan out, the cost would only be a delay of a short few months.

It really seems like a win-win situation. To put it succinctly: *Cap but Study.*

A handwritten signature in black ink, consisting of several loops and a long horizontal stroke, is written over the text "Signature on File".

Signature on File

Enclosure: December 4 letter to Bob Merrill of the California Coastal Commission.

God is too big to fit into just one religion.

Howard Ennes

• 160 Woodland Drive • Fort Bragg, California • 95437-4521 •
• (707) 964 - 7860 • e-mail: nsdusoir@mcn.org •

December 4, 2008

California Coastal Commission, North Coast District Office
Bob Merrill, District Manager
710 E Street, Suite 200
Eureka, CA 95501

Dear Mr. Merrill:

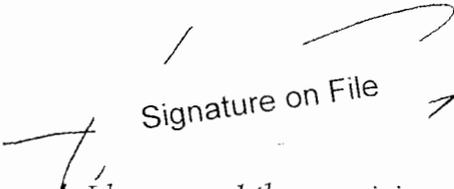
I am a Naval Officer retired after service with the WWII Medical Department; also a Commissioned Officer in the US Public Health Service, a trained public health professional, past president of national and international professional societies, and a retired VP for health affairs of the Equitable Life Assurance Society of the U.S. Consequently, I feel I have some standing, even at age 91, to an opinion about handling of the Dioxin-contaminated soil at the Fort Bragg mill site. FYI I have been active, from my current residence, in discussions about clearing the site, having observed the circumstances firsthand.

I am concerned about the idea of encapsulating the contaminated material on a permanent basis. I am not satisfied that the current encapsulation plan will prevent contamination of ocean and ground water when, inevitably, the 'cell' deteriorates, is invaded by soil, and leaches into ground water and the nearby ocean.

Encapsulation temporarily, yes, for up to perhaps five years or so, in hopes that some effective way of decontaminating can be found — myco-remediation, for example. As a public health professional, that possibility is intriguing, but, of course, requires actual evidence of its effect. If that does not work out, then the contaminated material should be removed entirely from the Site — which is right in the midst of an active community. The public health hazards are simply too much to accept.

I would appreciate your considering my thoughts as you proceed with Commission proceedings.

Sincerely,


Signature on File

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P.S.: Not being an attorney and even though I have read the provisions of the Coastal Act, I have difficulty in seeing how this encapsulation proposal fits into the Act's description of a "Coastal Dependent Activity".

5 January 2008

Bob Merrill
North Coast District Office
California Coastal Commission
710 East St., Suite 200
Eureka, CA 95501

RECEIVED

JAN 08 2009

CALIFORNIA
COASTAL COMMISSION

RE: A1FTB05053A6, Georgia Pacific Mill Site in Fort Bragg, CA

Dear Mr. Merrill -

I am writing today to oppose capping the dioxin and other toxin-laden soils found in Ft. Bragg at the old Georgia-Pacific site. This capping will simply pass the problem to future generations. If capping is pursued, natural events such as earthquakes and tsunamis will then open up these toxins for our community.

Instead I support use of mushrooms and other bioremediation techniques to clean up the site. These techniques have been proven before, and they could be the source of new eco-tourism to the area. Georgia Pacific should pay for this since they are the polluters who caused the problem in the first place.

Sincerely,

Signature on File

Charles Cresson Wood
Alternative Fuels Management Consultant
Post-Petroleum Transportation
PO Box 708
Mendocino, CA 95460
Phone 707-937-5572
Email ccwood@ix.netcom.com

January 5, 2009

Bob Merrill,

I understand that the Georgia Pacific Mill Site in Fort Bragg, CA has been used in many different ways over the years. Please hold Georgia Pacific and the Koch brothers accountable for clean up so that Fort Bragg's coastal area can be used safely and enjoyed by all. I oppose the proposed plan to cap dioxins and other toxin-laden soils.

I do support full testing for myco and bio remediation. Capping is not a safe option. Please seriously consider all other options and fully fund all research and testing needed. Bioremediation not capping is the safer option for the Georgia Pacific Mill Site. Give Fort Bragg a clean, safe coastline. Thank you.

Sincerely,

Signature on File

"San Diego, CA

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JAN 08 2009

CALIFORNIA
COASTAL COMMISSION



SIERRA
CLUB
FOUNDED 1892

January 5, 2009

CDP A-1-FTB-05-053-A6
DENY

North Coast District Office
California Coastal Commission
Robert Merrill, District Manager
710 E Street, Suite 200
Eureka, CA 95501

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JAN 08 2009

CALIFORNIA
COASTAL COMMISSION

Dear Mr. Merrill,

I am writing to ask the Coastal Commission to DENY the application for a CDP that permits containment and capping of dioxin and furan contaminated soils at the Georgia-Pacific Corporation mill site in Ft. Bragg. Georgia Pacific must live up to its publicly stated promise to wait until the results of the bench tests are in. My reasons for opposing this application are itemized below.

• **Tsunamis and Rising Sea Levels**

The chosen site for the consolidation cell is located a few hundred yards from coastal bluffs buried 6 feet beneath the soil surface. The proposed containment and capping does not adequately address the hazards of tsunamis or rising sea levels resulting from climate change. Tsunami warnings are issued for the Ft. Bragg area on a regular basis.

• **No Safe Levels of Dioxin**

Dioxins and furans are some of the most toxic chemicals known to science. A draft report released for public comment in September 1994 by the US Environmental Protection Agency clearly describes dioxin as a serious public health threat. The public health impact of dioxin may rival the impact that DDT had on public health in the 1960's. According to the EPA report, not only does there appear to be no "safe" level of exposure to dioxin, but levels of dioxin and dioxin-like chemicals have been found in the general US population that are "at or near levels associated with adverse health effects."

The International Agency for Research on Cancer (IARC) -- part of the World Health Organization -- published their research into dioxins and furans and announced on February 14, 1997, that the most potent dioxin, 2,3,7,8-TCDD, is now considered a Group 1 carcinogen, meaning a "known human carcinogen."

Also, in January 2001, the U.S. National Toxicology Program upgraded 2,3,7,8-TCDD from "Reasonably Anticipated to be a Human Carcinogen" to "Known to be a Human Carcinogen." See their reports on dioxins and furans from their most recent *11th Report on Carcinogens*.

Finally, a 2003 re-analysis of the cancer risk from dioxin reaffirmed that there is no known "safe dose" or "threshold" below which dioxin will not cause cancer.

A July 2002 study shows dioxin to be related to increased incidences of breast cancer.

• **Capping Sets an Undesirable Precedent**

The 13,000 cy of contaminated soil identified in the application is not the only location contaminated at the mill site. Capping will set a precedent for capping other dioxin-contaminated soil at this site and other sites within the Coastal Zone.

From a letter June 2006 from Environmental Consultants Fugro West:

On June 6, 2006, the Georgia-Pacific Investigation Team provided Fugro West, Inc., and SLR International Corp with an update of recent investigation findings. Summary information included results of dioxin analyses conducted on a total of 37 samples. In consideration of an upcoming 4th of July fireworks event, this memorandum focuses on the dioxin findings.

Analyses detected dioxin concentrations in three types of media at the site, including:

- Ash stockpiles – approximately 3,000 cubic yards of ash located in the eastern portion of Area 7,
- Soil – primarily subsurface soil located at depths of 2 to 9.5 feet with visible indications of ash in Areas 8 and 10, and
- Sediment – from various ponds locations at depths ranging from 0 to 14 feet below the pond.

This is just one report. To date, there are even more findings of dioxin contaminated soil. The full site characterization is still underway but results to date can be viewed on the DTSC website: <http://www.dtsc.ca.gov/>

• **Fungicide Burned with Redwood Bark**

The redwood bark burned in the Power House was sprayed with the fungicide Pentachlorophenol. When burned at a low temperature that fungicide creates large molecule dioxin. As a result, the fly ash that has contaminated the mill site soil **is not**, as Chip Hillardes said at the December 12, 2008 California Coastal Commission hearing, "like fly ash you find in your fire place."

There have also been numerous reports from ex-employees of G-P of toxic waste materials being burned in the Power House, such as contaminated diesel oil sprayed on the bark to help it burn.

• **Feasible Myco-Remediation Alternatives Now Available**

Two proposals to remediate the soils, sediment and ash at the G-P mill site have been submitted by NewFields Laboratory to Georgia-Pacific Corporation. Both proposals utilize the latest in mycoremediation technologies, and updates will be available in early February 2009.

• **Temporary Capping ONLY.**

We ask the California Coastal Commission to allow temporary capping only. This will enable Georgia-Pacific Corporation to further investigate on site remediation methods, including the provision new myco-remediation technologies.

Should on site remediation fail to achieve the Residential Primary Remediation Goal (PRG) of 3.9 rg/g of dioxin equivalents (TEQ), the contaminated materials should be removed from the mill site and transported to an approved disposal facility.

• **Applicant Should Complete the Full Site Characterization**

The Department of Toxic Substances Control reports that a complete investigation for a full mill site is currently underway. A complete CDP application should include the results of that investigation.

• **Bench Test Negotiations Currently Underway**

Myco-remediation Bench Test negotiations are currently underway with NewFields Laboratory and G-P. Dr. Jack Word, who will oversee the bench test, is currently working on the third and final revision of a proposal for Bench Testing the remediation of 10kg of contaminated soil from the G-P millsite. Paul Stamets of FungiPerfecti and Dr. Jack Word are proposing the use of 20 possible samples per fungal species with treatment during a 12-week test period.

A complete application should include the results of those proposed bench tests.

Because the application fails to address adequacy of containment to resist tsunamis and sea level rise, or to consider the latest in situ remediation methods, please DENY application A-1-FTB-05-053-A6.

Thank you for considering my views regarding this project.

Sincerely,

Signature on File



Peni
Sierra Club
30632 Marilyn Drive
Laguna Beach, CA 92651
949-499-4499

Permit A-1-FTB-05-053-A6
Georgia Pacific Corporation

To the California Coastal Commissioners

Mendocino 01-05-09

P.O. Box 806 Mendocino CA 95460

This letter is requesting that the California Coastal Commissioners deny permit A-1-FTB-05-053-A6 to the applicants Georgia-Pacific Corporation.

I am concerned about the 13,000 cubic yards of contaminated soil on the 1.5 acres of land on the Georgia Pacific Corporation property in the heart of Fort Bragg and located in the Coastal Zone.

Permitting a major corporation to bury toxic soil on the coast, contained or not contained, will leave a dangerous legacy for generations to come.

- 1) There is no "safe dose" for dioxins and furans and it endangers many people in a whole city of Fort Bragg. It is unacceptable from the perspective of public health.
- 2) The water levels may rise, or tsunamis may leach out these toxins. The site is too close to the oceans, six feet buried.
- 3) Capping will set a Precedent for more capping in the future on the mill site. There is more than just the 13,000 cy of dioxin contaminated soil on the mill site found to date. Capping will set a precedent for capping other dioxin contaminated soil in the future. GP has set aside another 9 acres for the purposes of capping. Don't let this 1.5 acre capping set a precedent for the future of the coast or our town!
- 4) Exploration of Adequate Alternatives Two proposals have been submitted by NewFields Laboratory to bench test Mycoremediation to Georgia Pacific Corporation and the final revision will be submitted in early February 2009. Bench Test negotiations are currently Underway- Myco-remediation Bench Test negotiations are currently underway with NewFields Laboratory and GP. Dr. Jack Word, who will be overseeing the bench test, is currently working on the third and final revision of a proposal for Bench Testing there mediation of 10kg of contaminated soil from the GP millsite. Stamets and Dr. Word are proposing the use of 20 possible samples per fungal species/treatment during a 12 week test period. Give it a chance to happen. The fungal samples will be selected from Paul Stamet's library of over 300 fungal species that have been identified to have bioremediation properties.
- 5) Temporary Capping ONLY. We ask that the California Coastal Commission mandate that Georgia Pacific look for an alternative to remediate the dioxin-furan soil and under a deemed timeline, the capped contaminated soil would need to be remediated on site with an alternative solution or be removed.
- 6) Last not least, this has the potential to ruin the tourism, which this area depends on so clearly.

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JAN 08 2009

CALIFORNIA
COASTAL COMMISSION

Respectfully
Lucy Gerken

Signature on File

91 of 210

January 5, 2009

Dear Mr. Merrill:

I am writing to oppose capping the dioxin and other toxin-laden soils and instead pursue fully funded myco-remediation and bioremediation. Isn't it a bit irresponsible to allow Georgia Pacific, who likely has more money than needed to survive as a healthy corporation, to take a less costly option? The issue is complex. In this coastal zone where earthquakes, tidal waves, and where there is a definite migration of more Americans to this beautiful area of California. Even without these events, eventually toxins would be transported into the ocean and into the Fort Bragg environment. Bench tests of myco-remediation must be fully funded using the most appropriate testing of fungi present can be found. An underfunded test which "fails" could give GP the excuse to revert to capping.

Myco- and bio-remediation is a viable means to return the Georgia Pacific mill site to health, and would illuminate a new precedent for dealing with toxins, bring increased tourism to benefit the local economy, and most importantly solve rather than hide the problem. Capping would pass problems to future generations and is not a truly viable option this close to the coast.

Sincerely,

MacLean Shaks-Hober, B.A., MA. (Forestry and Environmental Educator)
Holistic Approaches in Healing
949-A N. Oak Street
Ukiah, CA 95482

RECEIVED

JAN 12 2009

CALIFORNIA
COASTAL COMMISSION

red # of pages
correction
Jan. 5, 2009
Mill site Mary Wood
Fort Bragg, CA P.O. Box 216
Laytonville
CA 95454

California
Coastal Commission
Fort Bragg Planning Dept
" " " City Council
Ocean Protection Coalition
Natural Resources Defense
Pomo Indian Tribe Council
papers - letters to the
editor

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JAN 12 2009

CALIFORNIA
COASTAL COMMISSION

- 2 -

I heard on K74x The
other day of plans to
have Bioremediation -
using mushrooms - to
remove/detoxify the soils
on the "old CP" mill site
in the heart of the town of
Fort Bragg, Mendocino Co.

I request:
a full EIR
local input
public meetings
full, open disclosure
7th generation
Native/Pomo input.
Waulaki
Cahito People
Native Laytonville

93 of 210

dioxins, lead, ash from
years of burning bark to
operate the steam plant
on site, unknown toxins
are a serious threat to
the biological integrity
of this area. Adjacent
to the Pacific Ocean,
400+ acres of land
is now available for
potential public use
as a trail to access
the beach + ocean.

As a 35 yr. resident
of Caspar, CA, my
mother + I + children
have enjoyed the
beauty of the area as
a tourist attraction,
true benefit - both visual
+ economic can be seen by

NO TO BURYING - CAPPING THE SOILS

BP has applied for a toxic permit to bury the toxic soils - soils (some 1000 + truck-dioxins loads) underground on cancer. Cypress St. This is NOT producing. Repeat, NOT an acceptable solution.

Earth - LAWS of ECOLOGY -
quakenothing is created or destroyed. ALL things up - are interrelated. What well you do to the part, you do to the whole.

Fishing Impact We must take responsibility for the past, present + future. Toxins are toxins and don't just disappear. They must be seen, studied, investigated

ENV
+ Recovery *
and Remediated / ~~Be~~
contaminated. Use of
earthworms + mushrooms
can + have been used
successfully in JAPAN,
WASHINGTON State +
an educational job-
training for Local
residents, and study
of our LANDS (Gods
- in truth -
actually - we are stew-
ards/guardians) are

a positive potential.
Please, deny GP
permit to Bury / hide
(for future generations
to worry about) + mandate
GP - do the benchmark
investigation to clean

- 5 -

- up their mess. They made
millions in profits off
the Raper Village
taking of trees from
Mendocino co + other
areas in Calif / Oregon.

TAKE RESPONSIBILITY
Montesori Schools - (1st Dr.
woman in Italy - founder,
says "You make a mess
you clean it up."

GP cannot be allowed
to cut + run. Turn a
bad thing into a good
thing. Reduce, reuse,
recycle. Integrity, soils
can be cleansed + recover-
ed. A trail + ecological
model is possible.

6 -

Please, use your power, intelligence and authority to Deny OP's request to Hide their poison, and make them take Responsibility for their tailings. Invest in Green Earth Recovery.

Thank-you for your time, attention and consideration

Sincerely,

MA Signature on File AS,
PO Box 216
Laytonville, CA
95454

P.S. Fisheries concerns -
Environmental impact - all, ^{anemones,} seals, whale,
Wind - i.e. virus - mushroom, air move-
ment
Earthquake - seismic movements -
Upwelling - subduction - continental
tectonic plates x shelf-
Do NOT DISTURB!
NO OIL off choro. needed to lubricate plates x

96 of 210

P.S. STOP.

P.O. BOX 446 Fort Bragg, CA 95437

North Coast District Office
Bob Merrill, District Manager
710 E Street, Suite 200
Eureka, CA 95501
January 5, 2009

RECEIVED

JAN 06 2009

CALIFORNIA
COASTAL COMMISSION

Re: Permit A-1-FTB-05-053-A6

Dear Mr. Merrill,

We are asking that the Coastal Commission uphold the Adequate Exploration of Alternatives by supporting the proposal for the Bench Test for Myco-remediation. In May 2008, GP committed to paying for such a test as a possible remediation alternative on the Georgia Pacific mill site in Fort Bragg.

The CCC staff report refers to White Rot Fungus as a non-viable alternative in myco-remediation of dioxin contaminated soil. However, there are over 300 strains already proven to have bio-remediation properties in the FungiPerfecti Fungal Library that may work on dioxin. These vast FungiPerfecti resources are the basis for the Bench Test that is currently being negotiated between GP, DTSC and NewFields Laboratory.

Paul Stamets, founder of FungiPerfecti, has spent over 30 years studying mycelium and its effects on toxins. He currently has contracts with the Department of Defense cleaning up contaminated airfields, National Institute of Science for breast cancer research and Mason County in Washington to clean up contaminated water flowing in to Puget Sound. In addition, Mr. Stamets is the author of five books on mycology, including his latest book, "Mycelium Running: How Mushrooms Can Save the World."

Two conference calls about this myco-remediation Bench Test have occurred with Mr. Stamets, Dr. Jack Word from NewFields Laboratory, staff from Georgia Pacific Corporation, Department of Toxic Substances Control, staff from the City of Fort Bragg, and Community Members.

Dr. Word, who will be overseeing the bench test, is currently working on the Second revised proposal for the Bench Test. Mr. Stamets and Dr. Word are proposing the use of 20 possible samples per fungal species/treatment during a 12 week test period. More details can be found in the attached preliminary proposal.

Similar research is being conducted in progressive countries around the world including Japan, Germany and Australia. In a quickly evolving world, bio-remediation is the ethical solution. Capping is a method of the past.

Background Information – Steps Leading to Bench Test Negotiations

January 2008: Paul Stamets toured the GP mill site with Bridgette DeShields, Linda Ruffing, and community members Antonio Wuttke and Thaïs Mazur.

May 2008: The community recommends that GP speak with Mr. Stamets about the possibility of mycelium being used to clean up the dioxin-furan contaminated soil on the GP mill site. In a Fort Bragg City Council meeting the idea of myco-remediation is well received by the city council members and the public. **GP commits to paying for a myco-remediation bench test.**

June 2008: Three community members, Thaïs Mazur, Antonio Wuttke and Debra Scott, attend a workshop with Paul Stamets on myco-remediation at FungiPerfecti.

June 2008: Conference/call with DTSC, Chip Hillardes GP, City of Fort Bragg City Manager Linda Ruffing, Bridgett Deshields Arcadis-BBL, Glenn Young FugroWest, Paul Stamets FungiPerfecti, Dr. Jack Word NewFields Laboratory, and community members Antonio Wuttke, Debra Scott and Thaïs Mazur.

September 2008: Second conference/call to develop the Bench Test proposal for the presently ongoing revision from NewFields Laboratory.

Attached Documents:

- NewFields Laboratory Brochure
- NewFields preliminary Bench Test Proposal
- Map with proposed consolidation cell

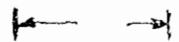
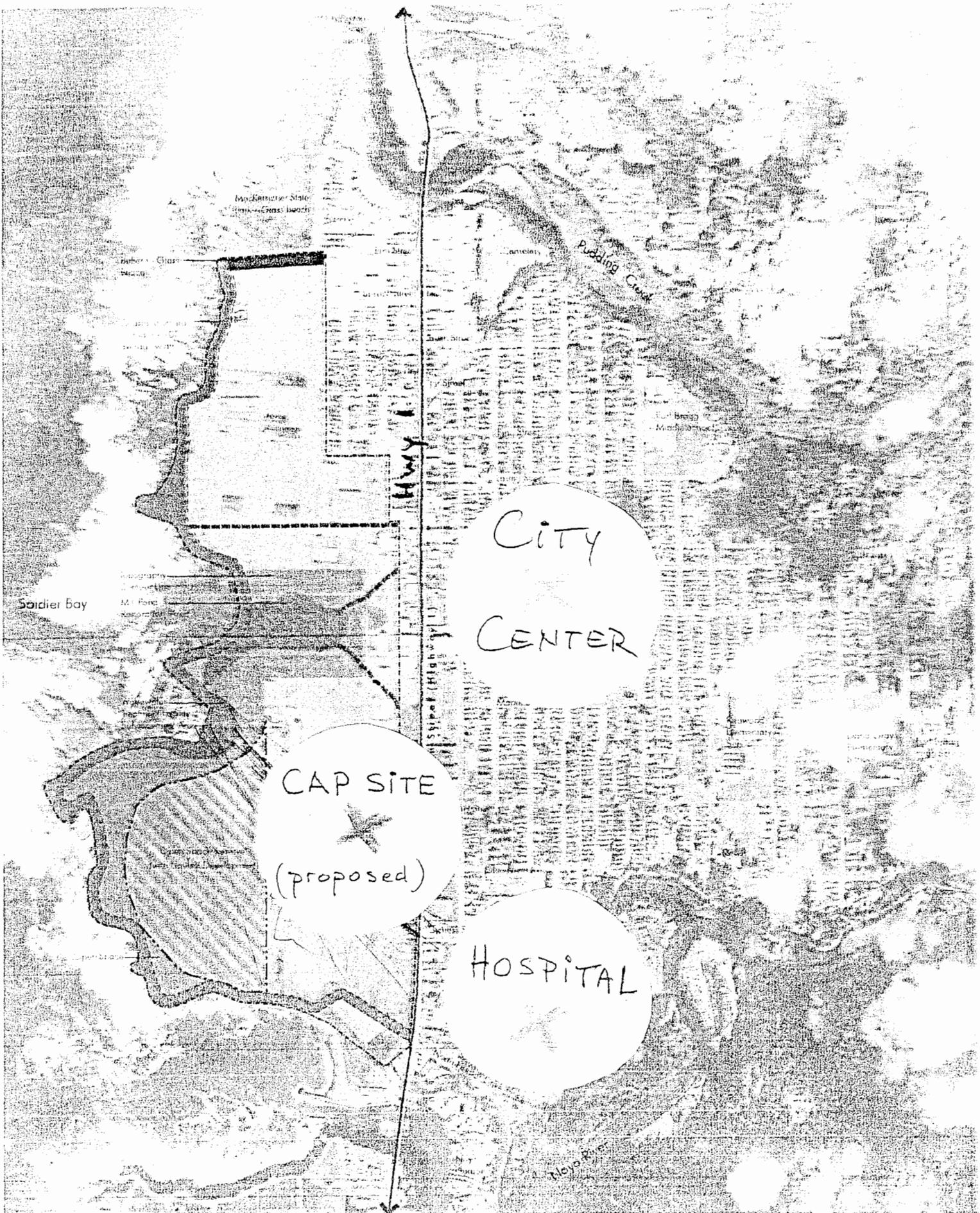
Signed

Signature on File

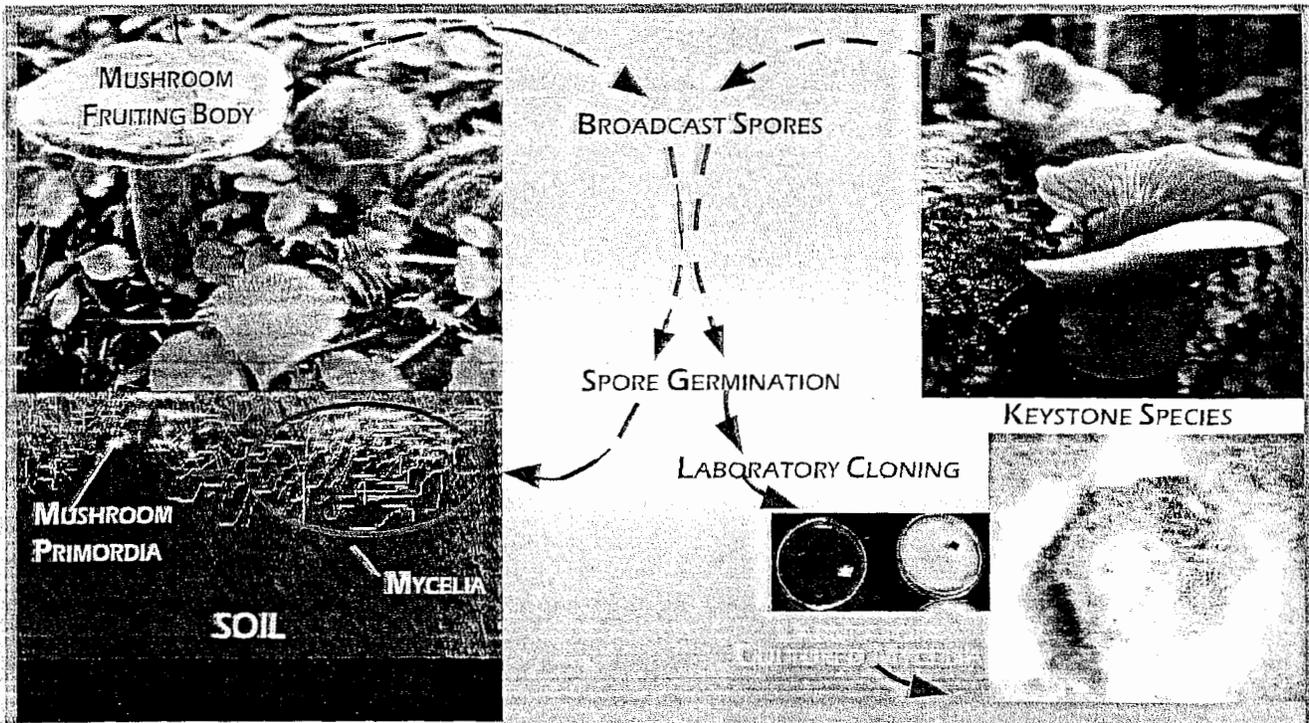
Thaïs Mazur, North Coast Action

Signature on File

Antonio Wuttke, Environmental Designer



MYCOREMEDIATION



... IT'S THE MYCELIA THAT ALLOWS US TO HARNESS NATURE'S POWER

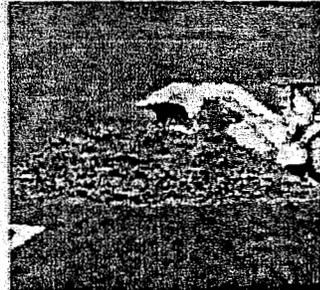
FROM LABORATORY TO FIELD APPLICATIONS



Laboratory Cloning and Training



Mycelia-- Broadcast to Media



Integration with Contaminated Sediments



Successful Field Trial Resulted in Reduced Contaminant Levels

NEW FIELDS

MYCOREMEDIATION

Mycoremediation is a form of bioremediation that takes advantage of the natural ability of fungal enzymes to break down complex structures by altering this process to degrade anthropogenic contaminants. This technology uses fungal mycelia which are the vegetative body of the fungus growing beneath the soil surface (or within another substrate such as wood). As this web of mycelium moves toward organic materials like lignin or cellulose, it secretes extracellular enzymes to digest the large molecular structures into simpler compounds (Figure 1). These materials are then absorbed by the organism where further digestion occurs.



Figure 1.
Extracellular enzymes are shown above

The similarity in structure between anthropogenic and natural compounds allows the fungal mycelia to break down the anthropogenic compounds using them as food sources as well. Natural food resources of fungal species are structurally similar to anthropogenic compounds such as: DMMP organophosphates (~ATP), PAHs (~lignin), benzene, PCB, and DDT ring structures (~cellulose, chlorophyll), caffeine (~adenine). Figure 2 below illustrates the natural degradation process which occurs with both natural and anthropogenic compounds.

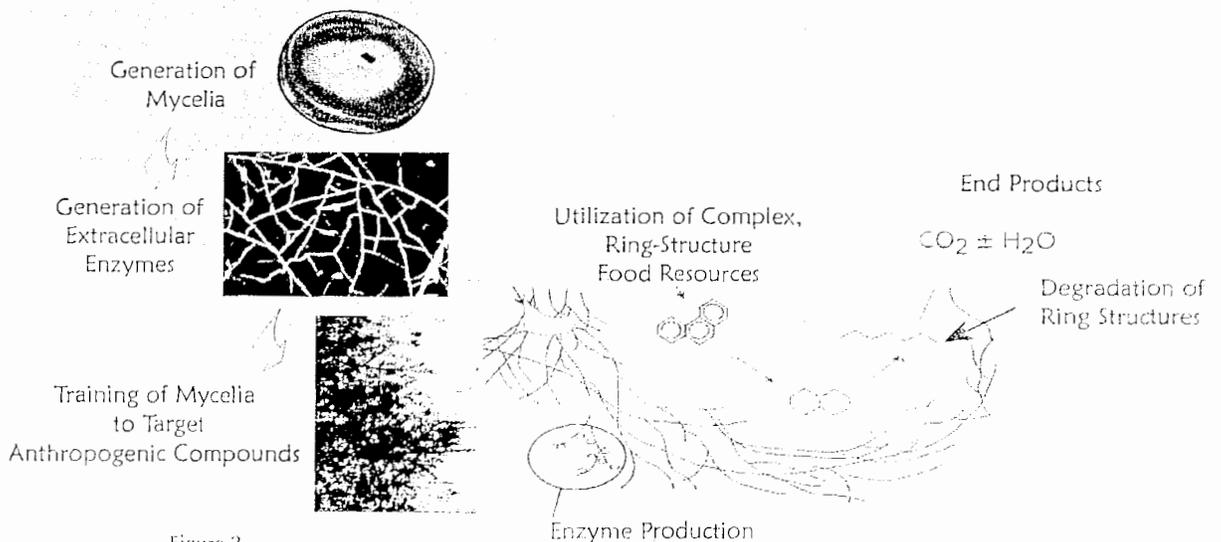


Figure 2.

This process has been successfully adapted to degrade a variety of anthropogenic contaminants by careful selection of fungal mycelia based on site-specific contaminants and conditions. The selected mycelia are cultured and broadcast to the field in a rapid and cost efficient manner. The time scale for Mycoremediation is weeks compared to other treatments that may take months or even years.

Advantages

This natural, 'green' technology offers many competitive advantages over other processes. It is environmentally safe and economical and requires very little maintenance. The system is completely portable with no pretreatment of material required and no secondary waste streams generated as a result of the treatment. The added benefit of this green technology is the control of unwanted odors and the creation of beneficial end use products such as landscaping material, clean capping material or roadside fill.

Fungal characteristics make them suitable for remediation under a wide range of environmental conditions:

- Range of pH extends from 1 to 9
- Chitin cell wall enables fungus to tolerate high concentration of anthropogenic contaminants, salts, and maintain growth in hostile environments
- Some fungi thrive at temperature extremes, from -5 °C to 80 °C
- Aerobic process can be modified to work at sediment/soil depths of 5 ft or more using a passive aeration system

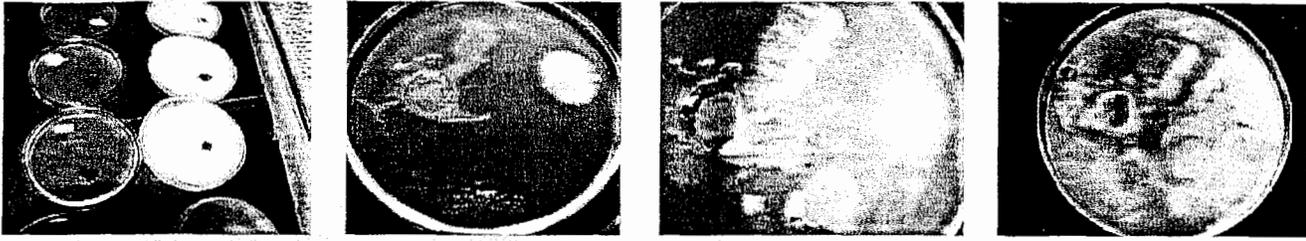


Figure 3. Laboratory Seeding of Mycelia, Showing Growth Toward Contaminant Compounds (red)

Strategic Steps Used in Mycoremediation

1. Contaminant/Site Evaluation: First, the chemical or biological contaminant that is being remediated is examined to determine a key structural characteristic that, if removed, will permit the breakdown of the entire chemical or organism.
2. Mycelial Selection: Fungi are chosen either from the contaminated site and/or from a library of >300 strains of fungi maintained by Fungi Perfecti, LLC. Selection is based on the similarity of natural food materials utilized by fungal species and the contaminant(s) of concern in the samples.
3. Laboratory Phase: Mycelia of the selected fungal species are grown on an appropriate growth media. First, the mycelium is grown on high nutrient agar where all components that are required for vigorous growth are included. Then, a second batch is seeded on low nutrient agar that also contains a portion of the contaminant. This process is shown above in Figure 3. Often this stage is repeated until more vigorous growth is observed and the only food source remaining is the target contaminant.
4. Expansion to Broadcast Substrate: Species that have successfully metabolized the contaminant of concern are then expanded onto a broadcast substrate in order to maximize the volume of trained mycelia. The inoculated broadcast substrate can be a variety of materials such as wood chips, sawdust, burlap, or cardboard.
5. Midscale Trials: The final laboratory or microcosm-based stage evaluates remediation effectiveness at various levels of increasing biological complexity under environmental conditions.
6. Applications: Several diverse strategies are available for mycoremediation of wastewater effluents and contaminated substrates, such as, in-line wastewater treatment, mesocosm treatment strategies, watershed biofiltration strategies, and/or constructed wetland and engineered ecosystems (as illustrated on the following page).

Successful Applications

Numerous laboratory trials have been successfully performed for a variety of contaminants [PAHs, Alkanes, OP pesticides (DMMP and IMPA), PCBs, DDT and alkaloids]. Recent field trials have also successfully remediated petroleum products from industrial sites and reduced bacterial levels related to agricultural runoff. Many of these studies are highlighted in the sections entitled 'Case Studies.'

Commonly Asked Questions

- What is the typical degradation time frame for mycoremediation? Answer: Based on our laboratory studies, degradation occurs over a period of 8 to 10 weeks per cycle for ~90% reduction
- How does this time scale compare with traditional remediation processes? Answer: Natural remediation of recalcitrant compounds may vary. DDT degradation to its dechlorinated congeners such as DDE and DDD may take decades; however, results of our mycoremediation study showed a reduction of DDT half life from ~15 years to 28 days.
- What depth of substrate can be treated? Answer: Mycoremediation requires an aerobic environment to function; current technology using passive aeration has increased treatment depths to ~ 5 ft. This depth range may increase with advances in passive aeration technology
- How is the system turned off? Answer: The mycelia have a natural life cycle, and become senescent at the end of their life cycle. For field applications, every effort is to work with indigenous fungal populations that will exist in a natural balance with the local environment. If non-indigenous species are used, several control steps are available (such as impermeable barriers, or use of other biological and chemical inhibitors).
- Can the enzymes be harvested and used independently of the mycelia? Answer: Yes; this process is currently under study
- What is the cost comparison compared to other treatments? Answer: Generally Mycoremediation is very cost effective; however, cost may depend on infra-structure and engineering requirements

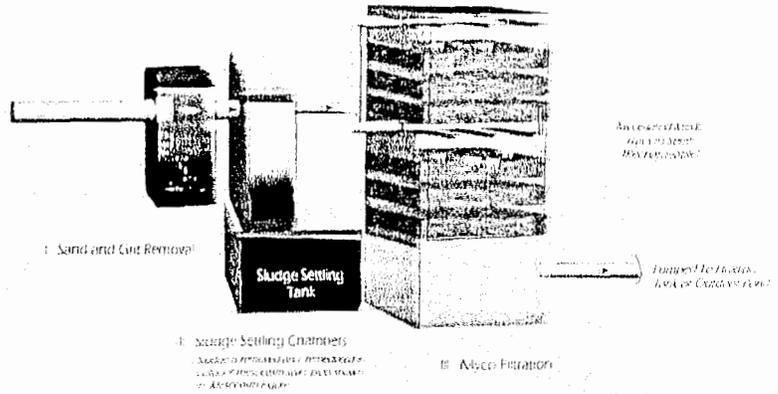
APPLICATIONS

IN-LINE WASTEWATER TREATMENT SYSTEMS

PROJECT:
JULIENNE WASTEWATER

New Experimental Design

- In-line effluent Biofiltration using mycofilters to replace carbon filters
- Sludge diverted and treated as described below in mesocosm section
- May be used in combination with existing carbon filters, mycelia enzymes sprayed onto filter to degrade contaminants

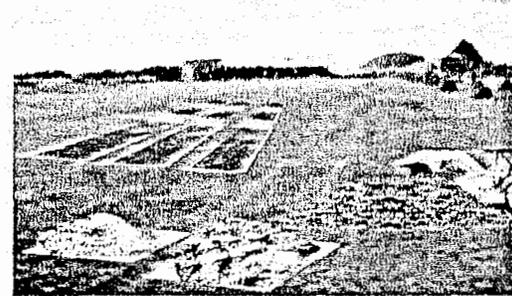


IN-SITU MESOCOSMS

PROJECT:
Washington Department of Transportation, Bellingham WA
Willamette River, Portland OR

- Treatment to remove contaminants or hot spots (proven technology)
- Treatment of contaminated sludge, soils, or sediment
- Above ground, raised beds, or in situ applications
- 'Lasagna' method of applying myceliated media to layers of contaminated soils/sediments/sludge
- May use passive aeration system to extend depth of treatment in sediment/soil to >5 ft

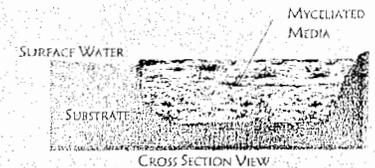
➔ Results in healthy substrate; reusable materials



WATERSHED BIOFILTRATION

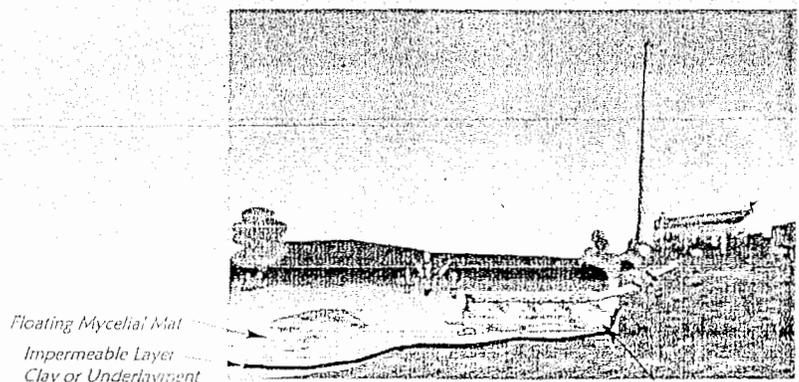
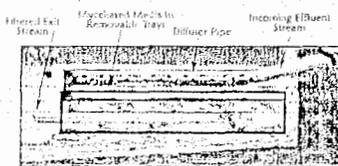
PROJECT:
DUMMINEY WATERSHED,
SEQUIM WA

- In situ applications used to treat surface water or ground water
- French drain configurations or mycelial beds common for retaining and remediating surface or groundwater
- Mycelial filtration cell lined with impervious layer then, catchment pipe is engineered for monitoring followed by a sand layer topped with soil, native plant and myceliated material on top



MYCO-ENHANCED CONSTRUCTED WETLANDS OR BUFFER ZONES

- Effluent biofiltration
- Surface water impoundment and treatment
- Buffer zone augmentation to capture and degrade surface or ground water preventing movement to streams, rivers



End-of-Pipe Biofiltration

Laboratory Study

A laboratory study focused on the photo-documentation of the interaction between mycelia and droplets of petroleum hydrocarbons. These observations have led to verification of behavior of extracellular enzymes released by mycelia; the mycelia pushed out toward the petroleum compound, engulfed it, and changed its viscosity (see accompanying photo). The effect of the fungal enzymes was to transport oil within the mycelium and a gradual breakdown until no visible signs of oil remained.



FIGURE 4
Photo showing
incorporation of oil into
mycelium

A Community Approach for Petroleum Hydrocarbon Degradation (PAHs)

Mycoremediation builds upon the concept of biological teaming and succession; the fungal mycelium breaks down complex organic compounds into smaller and smaller molecules which provide food for other microbes, plants and animals. One laboratory study illustrates the successful community approach to degrade PAHs. The design included a fungus treatment (sterilized materials) and a combination of fungus with naturally occurring communities (non sterilized materials). The study was conducted for an eight week period using a combination of Bunker C oil and number 2 diesel mixed in soil (2% by weight in 1 kg soil). As expected, the community based approach was the most successful with over 97% removal of total PAH, compared to 66% removal with fungal mycelia alone (Table 1).

A mesocosm study was conducted using 5-gal of soil contaminated with petroleum hydrocarbons (2% contamination by weight). Fungal mycelia was added to soil, and remediation was monitored by PAH analysis over time. Analysis at eight weeks confirmed 94% removal of PAHs, including 2 to 6-ringed compounds which include the more recalcitrant components of petroleum hydrocarbons.

Two Pilot-Scale Studies

Approximately 10 cubic yards of oil contaminated soil was treated at a Washington State Department of Transportation Maintenance Yard over a 4-month period. Observations at 9 weeks included: large fruiting bodies (Figure 5), no odor, no visible oil present in the soil, and penetration of mycelia to a depth of 3 feet into the mound. At the conclusion of the study the soil was acceptable for highway landscaping (Thomas et al. 1998). A second field Mycoremediation application remediated 9000 kg of sediment heavily contaminated with benzene, toluene, ethylene, and xylene (BTEX) and other hydrocarbons. The study took place at a site in Portland, Oregon where a residual oil gasification facility had operated for 42 years. Due to the potentially hazardous nature of the sediment, it was contained in a bin for the 8-month study. As a result of Mycoremediation, the original concentration of BTEX was reduced from 2600 ppm to levels below target USEPA values for industrial sediment (500 ppm), and PAH and diesel were reduced by >50%. This project was successful, and the material was removed from the hazardous classification list.



Figure 5.
Field Trial Mycoremediation
Performed on Petroleum
Contaminated Soils using
Pleurotus ostreatus.

104 of 210

PAH (ng/g)	No Treatment			Mycelia Only			Our Complex Community		
	Initial	8 Weeks	% Removed	Initial	8 Weeks	% Removed	Initial	8 Weeks	% Removed
2-Ring	8440	7641	9	8083	2607	68	7952	80	99
3-Ring	3019	2481	18	2705	1084	60	2815	47	98
4-Ring	490	444	9	454	171	62	503	169	66
5-Ring	124	107	14	110	55	50	132	69	48
6-Ring	24	20	15	22	10	56	24	12	51
Total PAHs	12097	10693	12%	11374	3926	65%	11426	376	97%

Table 1

CASE STUDIES

BACTERIA

Laboratory studies have demonstrated that fungal mycelium can detect, attack, inhibit or destroy selected bacteria including pathogenic and nonpathogenic strains. The mycelia sends out extracellular enzymes that reach the bacteria colonies and elicit a predation response (Figure 6). An additional laboratory study demonstrated reduction in bacterial counts with exposure to select mycelia strains (shown in Figure 7).

Field studies in Washington state are demonstrating successful reduction of coliform bacteria from wastewater generated by farming activities. Mycelia from a key species known to have anti-microbial properties is seeded into burlap bags containing media such as bark. In the example shown in Figure 8, the bags are inset into soil to form a barrier to surface water runoff which normally travels toward stream bed. The mycelia laden bark filters out coliform bacteria and other contaminants, ameliorating the downstream impact of livestock and pesticide wastes. These studies led by Fungi Perfecti are conducted in conjunction with Mason County. Mycoremediation is being considered as a best management practice by Mason County Conservation District.



Figure 8. Field Deployment of Myceliated Media. [Photo supplied by Paul Stamets, FungiPerfecti].

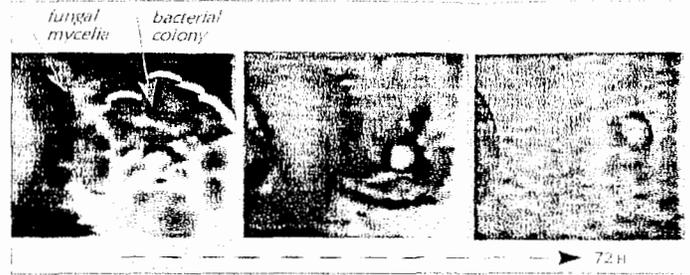


Figure 6. Time Lapse Photo Series Demonstrating Predatory Behavior of Mycelia as it Invades a Bacterial Colony

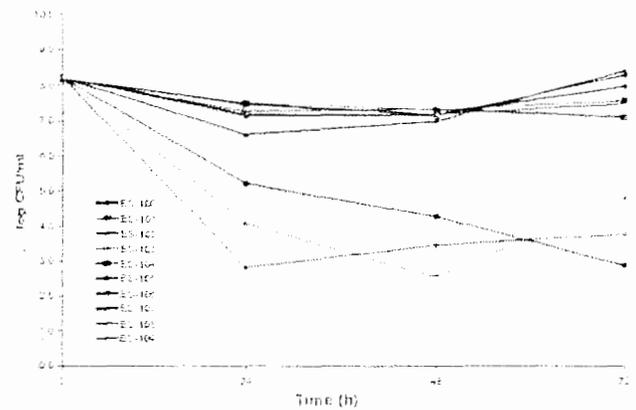


Figure 7. Effect of Antibacterial Compounds in Various Mycelia Strains on the Survival of *E. Coli* O157:H7. [Fungal extracts 100% concentration; data provided by Paul Stamets, FungiPerfecti]

OPs ORGANOPHOSPHATES

Organophosphate compounds are common ingredients in pesticides, detergents and fertilizers; they are also used as surrogates for chemical warfare nerve agents (see compounds illustrated at left). The structure of DMMP is similar to ATP, an important part of natural fungal energy metabolism. We have conducted studies at the laboratory and mesoscale with greater than 60% removal of DMMP and IMPA at concentrations up to 1000µg/g (Figure 9, 10). Further, the degradation of DMMP demonstrated by NMR indicated that the central phosphorus was removed from the chemical structure.



Figure 9. Laboratory Trial

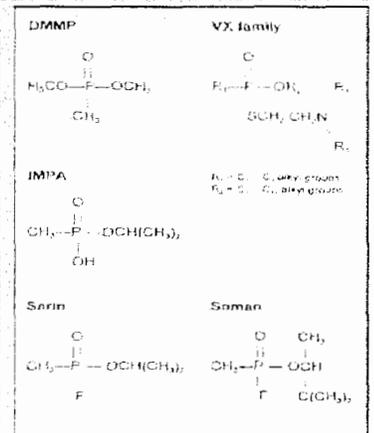


Figure 10. Chemical Structure of DMMP and Related Compounds

PCBs

PCBs are toxic and persistent chemicals primarily used as insulating fluids in heavy-duty electrical equipment in power plants, industries, and large buildings across the country. In 1979, USEPA banned the manufacture of polychlorinated biphenyls (PCBs) and phased out most PCB uses. One laboratory study was conducted using sediment contaminated with PCBs from a San Francisco Bay marsh environment. At the start of the experiment, there were individual congener concentrations >100,000 ppb. At the beginning of the test, there was also observations of black, anaerobic muds present. After an 8 week experimental exposure to Mycoremediation, there was a 30 to 60% reduction in congener concentrations (see graph, Figure 9).

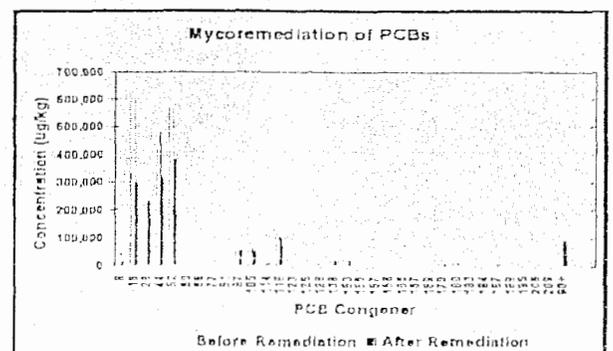


Figure 9. Results from 8 Week Experiment with PCB Contaminated Sediments.



CORE CAPABILITIES

- MYCOLOGY
- ECOTOXICOLOGY
- FORENSIC CHEMISTRY
- ENVIRONMENTAL RISK ASSESSMENT
- ENGINEERING

Newfields is known for excellence in engineering and scientific innovation, the extended Newfield community has recognized specialists in mycology, ecotoxicology, forensic chemistry, environmental risk assessment and engineering to ensure successful design and completion of projects as well as full evaluation of mycoremediation results. Our mycologists, scientists and engineers can work with you to design the most cost-effective manner in which to apply this revolutionary technology.

KEY STAFF

- MEG R. PINZA
- JACK Q. WORD, PHD.
- BILL A. WILLIAMS, PHD.
- ALLEN D. UHLER, PHD.
- GEORGE A. FRIGON
- WILLIAM L. HALL, P.E. - CEO

Ms. Pinza and Dr. Word have worked jointly on mycoremediation development for the past decade. They served as principal investigators on the case studies provided. Special expertise has been focused on identifying keystone fungal species for specifically targeting various classes of recalcitrant compounds under laboratory and mesocosm studies. Results from these studies reiterate the remarkable transformations of contaminant loads to reusable resources, a powerful "green" technology. Dr. Williams is a nationally recognized expert in environmental and human health risk assessment. Dr. Uhler specializes in forensic chemistry, particularly petroleum hydrocarbon metabolite analyses. Mr. Frigon brings

both an engineering perspective as well as vast experience in biofiltration systems to the team; his 35 years experience in industrial treatment systems include design, construction, and operation of systems employing all types of biological and physical/chemical treatment technologies. Mr. Hall has been a strategic planner, program manager and/or analyst on over 1000 remediation projects throughout the US and approximately 50 countries, he has served on approximately 30 expert technical review panels for government agencies mandated to address soil and groundwater contaminant fate and transport, management alternatives, and design/construction constraints.

ASSOCIATES

Paul Stamets and David Sturnerlin

Fungi Perfecti, LLC
www.fungiperfecti.com

Fungi Perfecti, LLC is a recognized leader in mycology research and development. Mr. Stamets has authored numerous books including, *Mycelium Running: How Mushrooms Can Help Save the World*, *Growing Gourmet and Medicinal Mushrooms*, and *MycMedicinals: An Informational Treatise on Mushrooms*. Photos used from *Mycelium Running* with permission: Figures 1, 4, 5 and 6.

Howard Sprouse and Thom O'Dell, Ph.D.

The Remediators, Inc.
www.theremediators.com

The Remediators, Inc. specializes in restoration of contaminated properties for landowners, businesses and communities. They employ a process known as MicroFlora Enhancement™, which use fungi for large scale applications of soil remediation. Mr. Sprouse is an experienced heavy equipment operator; he has managed numerous construction projects and specializes in designing field equipment to meet site specific needs. Dr. O'Dell is an experienced mycologist, and has extensive experience in fungal ecology.

Raleigh Farlow, PhD.

DMD, Inc.

Dr. Farlow is a recognized expert in specialized organic chemistry analyses, and has been instrumental in identification of the degradation products of DDT under mycoremediation trials.

N E W F I E L D S

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PORT GAMBLE, WA 98364
360-297-6040 360-297-7268 FAX

**Proposal to Remediate Dioxin Contamination from Soils,
Sediment and Ash at the G-P Site, Fort Bragg CA**

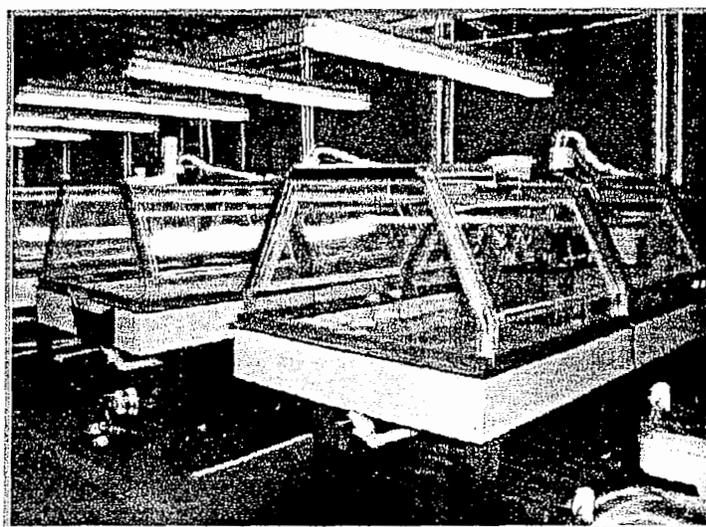
Statement of Project Objectives: The overall remediation goal is to reduce the soil/sediment concentration of dioxin equivalents (TEQ) at the G-P Fort Bragg site to the Residential Primary Remediation Goal (PRG) of 3.9 $\mu\text{g/g}$ TEQ. A dioxin data summary indicates that contaminated substrate materials are soils, sediment, and ash stockpiles exceed this PRG in 16%, 54%, and 100% of samples, respectively. Maximum-recorded concentrations are in the range of 1700 $\mu\text{g/g}$ TEQ (Fugro, 2006). NewFields is proposing a plan to reduce these contaminant levels using mycoremediation technology. We propose a tiered series of laboratory and mesocosm studies with performance criteria set forth for each experiment. The performance criteria will be evaluated by the project team and will serve as a guide for designing and conducting all incremental experiments as well as future field-scale application of this technology. We are optimistic that appropriate fungal species can be identified that are compatible in degraded redwood impacted substrates and that are capable of using dioxin-contaminated materials as a food source, thereby degrading the chemical compounds (Table 1). Past successful mycoremediation experiments conducted with other complex ring-structured contaminants have accomplished well over a 50% reduction in contaminant loads during relatively short time periods of ~12 weeks. Moreover, since the period of fungal activity corresponds to the mycelium life cycle, it would be possible to further reduce contaminant concentrations by recharging the mycelium exposure in mesocosm or field applications and augmenting bioremediation effectiveness through repeated fungal life cycles or use of additional fungal 'keystone' species.

The approach used for selection of fungal species involves the examination of the contaminant of concern, including chemical structural points of biological attack that foster the destruction of the molecule rather than removal of chemical side chains. The next step is to compare this contaminant to natural chemicals with similar structure and to literature references that indicate potential success of fungal remediation with the selected contaminant. The objective is to determine which species of fungi may be native to the site, are capable of growing in soils containing redwood and are capable of degrading naturally occurring compounds similar in chemical properties to dioxins in order to drive the degradation pathway toward destruction of the benzene ring structure rather than removal of side branches of chlorine molecules (reductive dechlorination). Currently, fungal species/strains are selected from our fungal library that is a repository of more 300 fungal species with known growth characteristics and degradation properties. We have also reviewed species that naturally occur in redwood forested areas of northern California coast, and will include species that may enhance site-specific performance characteristics in this environmental substrate.

We have divided this mycoremediation project into a tiered series of experiments that will result in the identification of species/strains that will be effective at remediating dioxin contamination at Fort Bragg. The experiments and corresponding specific objectives are:

- 1) *Site-Specific Growth Experiment* Determine the ability of selected fungi to rapidly colonize natural sediment/soil from Fort Bragg;

- 2) *Contaminant Challenge* Conduct laboratory trials with a subset of these candidate species which have been demonstrated to have dioxin-like compound breakdown. The source of contaminant will be contaminated materials from the Ft Bragg site;
- 3) *Broadcast Media Studies* Evaluate potential substrates for broadcasting the selected mycelia into site soils/sediment for fungal species that met performance criteria from experiments 1 and 2;
- 4) *Mesocosm Experiment* Conduct a demonstration project at a mesocosm scale that documents the success of dioxin remediation. The species/strains that pass through these tiers will then be proposed for field trials on-site at Fort Bragg.



All experiments will be conducted at the Port Gamble Environmental Laboratory, Port Gamble WA. Our environmental testing laboratory is Washington state and federally certified (WA certification number C2021; NELAC certification pending). Experiments using hazardous materials will be conducted by personnel certified in handling hazardous waste materials (HAZWOPER) in a controlled environmental chamber that isolates the contaminated soils and surrounding atmosphere from the technical staff (see photograph to left).

The individual tasks needed to accomplish these objectives are summarized below; a preliminary cost estimate and timeline follow the task summaries. It should be noted that each tiered element of the work plan would be reviewed and accepted by Georgia Pacific and DTSC prior to implementation and continuation to the next tier.

Task 1. Detailed Work Plan

NewFields will review data on the proposed remediation site including previously collected analytical data, site topography, and plans for future uses. NewFields will use this site-specific information to evaluate site conditions that might influence the growth of the potential species and contaminants of concern on-site. In addition, information on fungal species naturally occurring in the redwood forest of the northern California coast will be summarized and added to Table 1. A synopsis of the data review and a plan for conducting laboratory experiments will be included in a detailed work plan. The work plan will contain detailed information regarding the collection of field samples for use in the experiments described below, the reasons for selection of the species and strains for each phase of the experiments, the methods of chemical analyses that will be used and the replicate and compositing concept to be employed.

➤ *Deliverable:* Detailed work plan

Task 2. Selection of Candidate Species and Initial Fungal Grow-Out Trials

NewFields has access to extensive libraries of species and strains of fungi through its own collections and those of its research partners, Fungi Perfecti LLC and The Remediators, Inc. Additional fungal species can be added from the literature review of species known to inhabit redwood forests or isolated from materials collected at the Fort Bragg site. Often on-site collections of fungi are successful because these species are pre-adapted to site conditions. There will be more than 300 candidate species from these combined resources. Elements of this task are:

- *Select Species Relevant to Ft Bragg Site Conditions.* Develop a list of species that occur in redwood forest areas or potentially may be present in the general vicinity of the Fort Bragg site. Compare that list to the species/strains that are included in the libraries that are available to our group. Develop a list of those species that are both present and within our libraries and compare known growth characteristics that match conditions at Fort Bragg.
 - *Select Species Successful at Contaminant Degradation.* Compare this list of species to information that is available on experiments that have been successfully used to remediated chemicals under experimental or field conditions. Include species/strains captured under these two bullets for further assessment and testing.
 - *Identify Contaminant Break-Down Strategies to Optimize Dioxin Degradation Potential.* Compare chemical structure of contaminant to natural chemicals and provide literature and library assessments of species/strains that have the potential for attacking the contaminant or natural chemicals.
 - *Produce Ft Bragg Candidate Species List.* We will examine the information on growth characteristics and known remediation potential for these strains in order to select a subsample of approximately 20 species for initial laboratory trials. These species will be subjected to performance trials in order to identify the optimum performing subset of species to be used in mesocosm trials.
- *Deliverable:* Detailed fungal species annotated list with summaries of growth characteristics, and contaminant performance history.

Task 3. Experimental Performance Trials.

Species identified in Task 2 will be evaluated by conducting a growth experiment using contaminated material from Fort Bragg. The objective will be to reduce the number of potential candidate species/strains to those that grow well in the Fort Bragg area and which are most likely to be efficient at remediation of the recalcitrant dioxin levels in soils from Fort Bragg to levels that are acceptable for residential use. Rapid growth and prolific development of enzyme exudates will be key performance criteria for experiments 1 and 2; analytical chemistry assessments will be employed for experiment 3.

Laboratory Experiment 1: Growth Trials on Site Soils

The first laboratory experiment will be a growth trial comparing different fungal species for their ability to thrive in soils collected from the Fort Bragg area that is known to contain a large amount of redwood bark. The criteria for acceptable growth include rapid expansion into the soil and the production of extracellular enzymes (visual cue that degradation is possible).

- *Growth Trials Using Site Soils.* Up to twenty fungal species will be exposed to soils from the Fort Bragg area that contains a combination of redwood bark and dioxin residues
- *Performance Criteria.* Fungal species that exhibit strong growth characteristics including rapid expansion on test material and production of extracellular enzymes will be selected for further experimentation.
- *Analytical Chemistry Analyses:* None

Laboratory Experiment 2: Petri Dish Trials with Contaminant Exposure

The second laboratory experiment will involve a subset of fungal species identified during the first experiment. This experiment will examine the contaminant/fungal interaction by directional growth studies conducted in petri dishes containing fungus and an aliquot of contaminated soil containing environmentally relevant concentrations of dioxins.

- *Behavior of Fungal Species Exposed to Dioxins.* The goal of this experiment is to observe the interaction of the fungus in the presence of dioxin-laden soil and the production of enzymes is observed (noted by observations of the enzyme ring and the change in pH of the agar). Changes of pH are indicative of enzyme production as the fungus changes its surroundings in order to breakdown and ingest large organic molecules as a source of food.
- *Performance Criteria.* Fungal species exhibiting directional growth and prolific production of enzymes are selected for mesocosm experiments (Experiment 3).
- *Analytical Chemistry Analyses:* None

Laboratory Experiment 3: Mesocosm Trials with Candidate Species and Contaminated Soil Samples from Site

Approximately 10 kg of soil are required for each fungal species/strain or application method; if three different fungal species are chosen for the mesocosm experiments, then 30 kg of soil will be required for testing. The actual number of fungal species chosen for the mesocosm experiments depends on the outcome of the first two studies and available funding for chemical analyses. Upon arrival at the laboratory, the soil samples will be thoroughly mixed to a homogeneous consistency and five subsamples will be collected and submitted for chemical analysis. These samples will serve as the baseline starting point of dioxins levels in the soils prior to testing.

- *Experimental Set Up.* Each fungal treatment (consists of a particular fungal species grown on a particular type of wood chip) will include five replicates, collected at test initiation, and at four, eight, and twelve weeks of testing for a total of 20 possible samples per fungal species/treatment during the 12 week test period. To start the experiment, the soils will be amended with fungal inoculum and all samples will be visually monitored over the duration of the experiment. A control sample without a fungal inoculum will also be initiated at the same time. Every four weeks during the experiment, five replicate samples are collected and archived for potential chemical analysis.
- *Analytical Chemistry.* At the termination of the experiment, all replicate samples will be collected and archived but one composited sample will be submitted for chemical analysis. This sample composite will consist of well-mixed aliquots from each replicate sample. The results of the chemical analysis will determine if contaminant concentrations are significantly reduced. If they are then the archived samples will be analyzed to demonstrate statistical confidence in the mean response. For example, if the samples

collected from week 12 do not show a significant decrease of dioxin levels then no further testing is required. However, if a significant decrease of dioxins levels occurs then all the samples collected from week twelve will be analyzed to confirm the results and provide statistical confidence in the test results.

- *Use of Various Broadcast Media.* Different types of wood may be incorporated in the mesocosm studies to determine the ability of selected fungi to grown on different broadcasting substrate. It is possible that different applications such as layering soil and fungal treatment, adding burlap sacks, and the use of wash down enzymes will be compared during this phase of the experiment. For planning, we propose the following test schematic; the actual schematic will depend on the outcome of Experiments 1 and 2.

Fungal Treatment	Alder	Black Oak	Other	Enzyme Wash
A	√	√	√	√
B	√			√

We will use a variety of different broadcast media (alder, black oak, and possibly pampas grass) and inoculation methods process to address potential field application needs.

- *Sample Compositing for Analytical Chemistry Analyses.* These experiments will use an efficient compositing scheme to analyze initial and final concentrations of dioxins and dioxin congeners in test material. The plan is to document the mean concentration of dioxin contamination in the initial samples compared to mean concentrations after remediation.

Fungal Treatment	#Composite Sample at Test Initiation	#Archival Samples at Initiation	#Archival Samples at 4 weeks	#Archival Samples at 8 weeks	#Archival Samples at 12 weeks	#Composite Sample at Test Termination
A - on alder	1	5	5	5	5	1
A - on black oak	1	5	5	5	5	1
A - other wood	1	5	5	5	5	1
A - enzyme wash	1	5	5	5	5	1
B - on alder	1	5	5	5	5	1
B - enzyme wash	1	5	5	5	5	1
# Samples	6	30	30	30	30	6

- *Number of Replicates for Statistical Rigor.* Initial estimation of the success of remediation will be based on a composite mean sample of aliquots of at least five replicates, with the remaining replicate materials archived for potential future analyses.
- *Performance Criteria.* Criteria for success at this point will be a ~50% or more reduction in the composite sample at the end of the exposure relative to the starting concentration. Candidate fungal species/strains will be screened for the ability to reduce the initial starting concentrations of dioxins. We anticipate that ~50% reduction is a reasonable expectation

based on literature values for some species. Species/strains demonstrating this level of reduction can then be evaluated using the archived replicates to establish statistical confidence in the amount of reduction.

- *Bioassay on Residual Bi-Products.* Additional bioassay testing may be performed to assess toxicity of residual bi-products produced with dioxin degradation.
- *Analytical Chemistry Analyses:* Yes; sampling and analysis strategy employed for cost effective results. (See Task 4). Minimum dioxin analysis of 12 composite samples (6 initial and 6 post remediation). Archived replicate samples will be analyzed only when the performance criteria are met for composited samples. Strategically, this will result in a statistically rigorous dataset in the most cost-effective manner.

➤ *Deliverable:* Data report on all aspects of mycoremediation trials. (See Task 5)

Task 4 Analytical Chemistry

Laboratory samples will be composited and submitted for chemical analysis to a laboratory that specializes in dioxin/furan analysis. The laboratory will use USEPA Method 1613. The number of samples analyzed depends on the results of the baseline analysis and on the outcome of the data from one composite sample of each fungal species at test termination. Therefore, the number of analytical samples could range from 12 to 132 samples depending on how many fungal species (proposal based six fungus/wood treatments) are tested and how many archived samples will be analyzed for each fungal treatment.

Task 5 Reporting and Recommendations for Field Application

After all results are received, statistical analyses completed, and all evaluations made, NewFields will prepare draft and final reports. These will include summaries of all activities associated with collecting, compositing, and chemically analyzing soil samples.

The design for the field application will be developed based on results of the laboratory and mesocosm experiments; it is not included in our statement of work at this time.

Preliminary Cost Summary

Task Name and Number	Cost for Task
1. Detailed Work Plan	5.0 K
2. Fungal Candidate List	1.6K
3. Laboratory Experiments	
Experiment 1	15 K
Experiment 2	20 K
Experiment 3, excluding chemistry	25 K
4. Analytical Chemistry 6 composite, start and end @ \$1,000 per sample 5 replicates at start and end for 2 species	12K / [20K – additional, if needed]
5. Reporting and Preliminary Recommendations for Field Application	7.2 K

Timeline

A timeline of experiments is presented in the following figure.

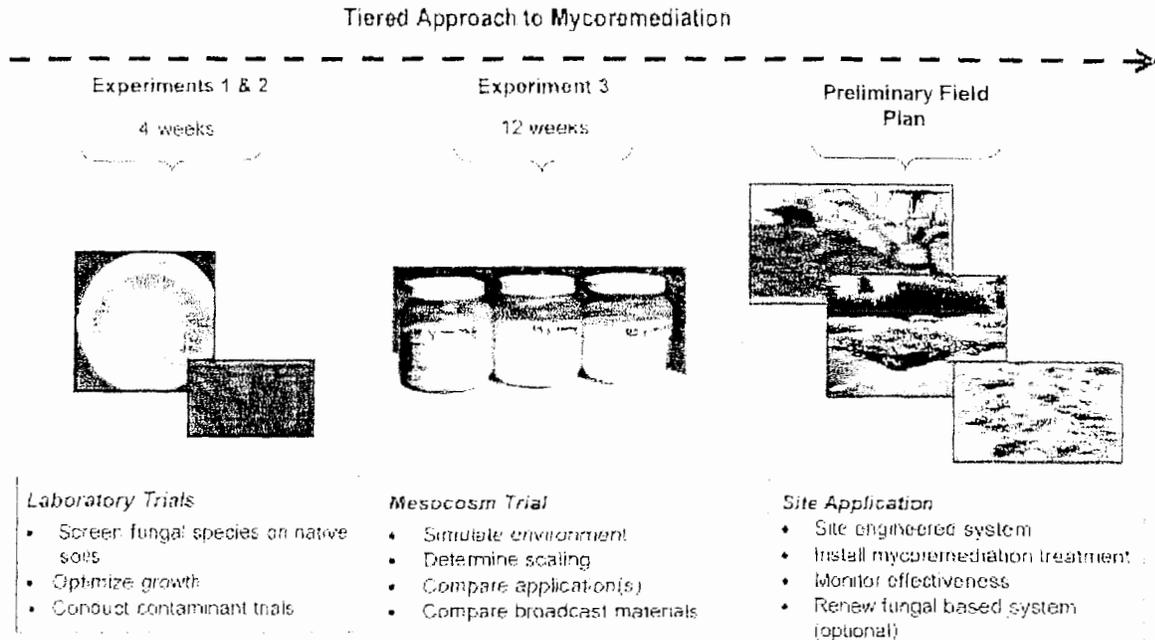


Table 1. List of Fungal Species Known to Occur in Redwood Forested Areas

[*Species known as dioxin degraders noted in bold type, **Other potential candidate species based on degradation of PCBs also noted in bold type]

Redwood Forest Species	
<i>Cryptosporiopsis abietina</i>	<i>H. coccineus</i> var. <i>umbonatus</i>
<i>C. variabilis</i>	<i>H. conicus</i>
<i>Cucurbitaria cononillae</i>	<i>H. flavescens</i>
<i>Cystoderma fallax</i>	<i>H. helobius</i>
<i>Cytispora pinastri</i>	<i>H. laeta</i>
<i>Cytolopiota</i> sp.	<i>H. laetissimus</i>
<i>Dacrymyces palmatus</i>	<i>H. marchii</i>
<i>Didymium squamulosum</i>	<i>H. minutulus</i>
<i>Diplomitoporus lenis</i>	<i>H. mollis</i>
<i>D. Lindbladii</i>	<i>H. moseri</i>
<i>Entoloma bloxami</i>	<i>H. psittacinus</i> var. <i>psittacinus</i>
<i>Fomitopsis meliae</i>	<i>H. puniceus</i>
<i>Galerina allospora</i>	<i>H. singeri</i>
<i>G. filiformis</i>	<i>H. sp.</i>
<i>G. perangusta</i>	<i>H. subvitellinus</i>
<i>Gelatinosporium</i> sp.	<i>H. virescens</i>
<i>Geniculosporium</i>	<i>Hygrophoropsis aurantiacus</i>
<i>Gloeophyllum carbonarium</i>	<i>Hymenochaete tabacina</i>
<i>G. odoratum</i>	<i>Hymenoscyphus sphaerophoroides</i>
<i>G. protactum</i>	<i>Hypholoma capnoides</i>
<i>Glomus caledonium</i>	<i>H. dispersum</i>
<i>G. convolutum</i>	<i>H. fasciculare</i>
<i>G. fasciculatum</i>	<i>H. sp.</i>
<i>G. macrocarpum</i>	<i>Hypocrea rufa</i>
<i>G. radiatum</i>	<i>Hypoxyton bipapillatum</i>
<i>Gymnopilus rufescens</i>	<i>H. thourisiamum</i>
<i>G. sanguinea</i>	<i>Inocephalus concavus</i>
<i>G. sp.</i>	<i>I. Cystomarginatus</i>
<i>G. ventricosum</i>	<i>I. minimus</i>
<i>Gymnopus vellosipes</i>	<i>I. rhombisporus</i>
<i>Hemimycena</i> sp.	<i>Lacrymaria velutina</i>
<i>Heterobasidion annosum</i>	<i>Laetiporus sulphureus</i>
<i>Hohenbuehelia geogenum</i>	<i>Lasiophaeria canescens</i>
<i>Hygrocybe acutoconicus</i> var. <i>microsporus</i>	<i>Lepiota atrodisca</i>
<i>H. aurantiosplendens</i>	<i>L. bruneodisca</i>
<i>H. cantharellus</i>	<i>L. clypeolaria</i>
<i>H. coccineus</i> var. <i>coccineus</i>	<i>L. cristata</i>
	<i>L. flammeatincta</i>

Redwood Forest Species - <i>Continued</i>	
<i>L. sp.</i>	<i>Lycophyllum decastes</i>
<i>L. nuda</i>	<i>L. sp.</i>
<i>Leptonia acuto-umbonata</i>	<i>Macrophoma sp.</i>
<i>L. anatina</i>	<i>Marasmiellus candidus</i>
<i>L. asprella</i>	<i>Marasmius androsaceus</i>
<i>L. atosquamosa</i>	<i>M. calhouniae</i>
<i>L. caesiocincta</i>	<i>M. fuscopurpurea</i>
<i>L. carnea</i>	<i>M. plicatulus</i>
<i>L. carneogrisea</i>	<i>Melanotus phillipsii</i>
<i>L. chalybaea</i>	<i>Meruliporia incrassate</i>
<i>L. Chalybaea var. chalybaea</i>	<i>Micromphale sequoiae</i>
<i>L. chalybaea var. squamulosipes</i>	<i>Morchella conica</i>
<i>L. decolorans forma cystidiosa</i>	<i>Mycena albissima</i>
<i>L. decolorans forma decolorans</i>	<i>M. clavata</i>
<i>L. diversa</i>	<i>M. epiterygia</i>
<i>L. exalbida</i>	<i>M. filopes</i>
<i>L. exilis</i>	<i>M. fusco-ocula</i>
<i>L. foliocontusa var. caeruleotincta</i>	<i>M. glaucopus</i>
<i>L. scabrosa</i>	<i>M. haematopus</i>
<i>S. separate</i>	<i>M. iodiolens</i>
<i>L. serrulata</i>	<i>M. maculate</i>
<i>L. sodalist</i>	<i>M. oregonensis</i>
<i>L. sp.</i>	<i>M. paucilamellata</i>
<i>L. strictipes</i>	<i>M. pura</i>
<i>L. subnigra</i>	<i>M. rugulosiceps</i>
<i>L. subrubinea</i>	<i>M. sanguinolenta</i>
<i>L. subviduense var. marginata</i>	<i>M. scabripes</i>
<i>L. subviduense var. subviduense</i>	<i>M. sp.</i>
<i>L. trichomata</i>	<i>Mycosphaerella sequoiae</i>
<i>L. turci</i>	<i>Myxomphalia maura</i>
<i>L. viridiflavipes</i>	<i>Myxotrichum ochraceum</i>
<i>L. wanthochroa</i>	<i>Naucoria sp.</i>
<i>L. yatesii</i>	<i>Nodulisporium sp.</i>
<i>Leptostroma sequoiae</i>	<i>Nolanea ameides</i>
<i>Leucoagaricus rubrotinctus</i>	<i>N. bicoloripes</i>
<i>L. sp.</i>	<i>N. clandestine var. oculobrunnea</i>
<i>Leucogyrophana mollusca</i>	<i>N. hebes</i>
<i>Lycoperdon perlatum</i>	<i>N. hirtipes</i>

Redwood Forest Species - *Continued*

<i>N. lucida</i>	<i>P. terrestris</i>
<i>N. minuto-striata</i>	<i>Phomopsis occulta</i>
<i>N. odonata</i>	<i>P. occulta</i>
<i>N. proxima forma inodorata</i>	<i>P. sp. I</i>
<i>N. proxima forma inodorata</i>	<i>P. sp. II</i>
<i>N. pseudostricta</i>	<i>Phyllosticta sp.</i>
<i>N. pusillipapillata</i>	<i>Phyllosticta-like sp</i>
<i>N. sericea</i>	<i>Phymatotrichopsis omnivora</i>
<i>N. sp.</i>	<i>Physalospora</i>
<i>N. staurospora</i>	<i>Phytoconis ericetorum</i>
<i>N. staurospora va. Incrustata</i>	<i>Pithya cupressina</i>
<i>N. stricta</i>	<i>Pleurocybella porrigens</i>
<i>N. undulate</i>	<i>Pleuroplaconema sp.</i>
<i>Oligoporus sequoiae</i>	<i>Pleurotellus sp.</i>
<i>Omphalina epichysium</i>	*Pleurotus ostreatus
<i>O. ericetorum</i>	<i>Pluteus cervinus</i>
<i>Oncospora abietina</i>	<i>P. salicinus</i>
<i>Panus conchatus</i>	<i>P. sp.</i>
<i>Paraleptonia scabrulosa</i>	<i>Podostroma alutacea</i>
<i>Paxillus atrotomentosus</i>	<i>Psathyrella hydrophila</i>
<i>P. panuoides</i>	<i>P. longistriata</i>
<i>Pestalotiopsis funereal</i>	<i>P. sp.</i>
<i>Pezicula livida</i>	<i>Pseudohydnum gelatinosum</i>
<i>Peziza fusca</i>	<i>Pulcherrinum caeruleum</i>
<i>P. gemmea</i>	<i>Pyrenochaeta sp.</i>
<i>P. molesta</i>	<i>Pyronema omphalodes</i>
<i>P. pithya</i>	<i>Pythium sp.</i>
<i>P. ustorum</i>	<i>Ramularia lactea</i>
<i>Phanerochaete burtii</i>	<i>Rarmariopsis kunzeii</i>
<i>P. sanguinea</i>	<i>R. sp.</i>
<i>Phellinus ferruginosus</i>	<i>Recipilus fasciculata</i>
<i>P. ivicola</i>	<i>Rhodocyge hondensis</i>
<i>Phellodon atrata</i>	<i>R. microlens</i>
<i>Phyletaena sp.</i>	<i>R. Travyospora</i>
<i>Pholiota astragalina</i>	<i>Rosellinia mutans</i>
<i>P. malicola</i>	<i>Schizophyllum commune</i>
<i>P. sequoiae</i>	<i>Schizoporia flaviporia</i>
<i>P. sublateralium</i>	<i>S. paradoxa</i>

Redwood Forest Species - <i>Continued</i>	Dioxin Degrading Species
<i>Seiridium juniperi</i>	* <i>Pseudallescheria boydii</i>
<i>S. sp.</i>	* <i>Phlebia lindtneri</i>
<i>Serpula hexagonoides</i>	* <i>Cordyceps senensis</i>
<i>Skeletocutis amorphia</i>	* <i>Coriolus hirsutus</i>
<i>Spathularia flavida</i>	* <i>Paecilomyces lilacinus</i>
<i>Sphaeria confertissima</i>	* <i>Trametes multicolor</i>
<i>Stereum hirsutum</i>	* <i>Dichomitus squalens</i>
<i>S. ostrea</i>	* <i>Trichosporon mucoides</i>
<i>Stictis radiata</i>	
<i>S. versicolor</i>	Other Candidate Species
<i>Stropharia ambigua</i>	** <i>Bjerkandera adusta</i>
<i>Torula herbarium</i>	** <i>Coriolus versicolor</i>
** <i>Trametes versicolor</i>	** <i>Coriolopsis polyzona</i>
<i>Tremella mesenterisca</i>	** <i>Funalia gallica</i>
<i>Trichaptum abietinum</i>	** <i>Hirneola nigricans</i>
<i>Tricholomopsis decorata</i>	** <i>Lentinus edodes</i>
<i>T. rutilans</i>	** <i>Phlebia brevispora</i>
<i>Trichopilus jubatus</i>	** <i>Poria cinerescens</i>
<i>Verpa digitalisformis</i>	
<i>Xeromphalina campanella</i>	
<i>X. caudicinalis</i>	
<i>S. fulvipes</i>	
<i>X. orickiana</i>	

January 6, 2009

North Coast District Office
California Coastal Commission, attn: Bob Merrill
710 East St., Suite 200
Eureka, CA 95501

RE: A1FTB05053A6, Georgia Pacific Mill Site in Fort Bragg, California

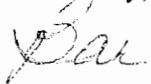
Dear Mr. Merrill:

I am writing to oppose capping the dioxin and other toxin-laden soils and instead pursue fully funded mycoremediation and bioremediation. It is both unethical and irresponsible to allow Georgia Pacific the less costly option in the coastal zone where earthquakes, tsunamis, global warming, and definite migration which even without these events would transport the toxins into the ocean and into the Fort Bragg environment. Bench tests of mycoremediation must be fully funded so the appropriate fungi can be found. An under-funded test which "fails" could give GP the excuse to revert to capping.

It only makes sense when there is a viable alternative to fully remove the toxins by natural means to do so rather than leave the toxic legacy there like a sleeping dragon. Myco- and bio-remediation would create a new precedent for dealing with toxins, bring increased tourism to benefit the local economy and solve rather than hide the problem.

Again, capping would pass problems to future generations and is not a viable option this close to the coast.

Sincerely,



Signature on File



Barbara Goodell
P.O. Box 74
Boonville, CA 95415
707 895-3897
bgoodell@mcn.org

RECEIVED

JAN 08 2009

CALIFORNIA
COASTAL COMMISSION

RECEIVED

JAN 09 2009

CALIFORNIA
COASTAL COMMISSION

California Coastal Commission

No. Coast District Office, Suite 200

710 E Street, Eureka Ca 95501-

Ref # A1 FTB05053 AG

1-6-09

MR. Bob Merrill,

Whereas the 1st priority of the Coastal Commission criteria for issuance of a permit at the GP mill site - the overall protection of human health, has not been satisfactorily met by the responsible parties -

Whereas no data is available to determine the current level of toxins present in the residents, soil of the surrounding area due to the unregulated disposal of hazardous waste in the past -

Whereas an ongoing long term study of the contaminant level of the community is not a part of the proposal before the Commission.

Whereas only 1 strain of fungus (the white rot fungus) in a field of 20 possible candidates has been tested for application of the bioremediation process -

Whereas the preliminary findings of ^{myco-}remediation bench tests currently in process have not ~~have not~~ been given sufficient time for consideration -

Whereas there exists a substantial concern for the continuity of oversight and accountability from a disruption in the services of project managers within the lead agency - Dept of Toxic Substances -

We, the undersigned urge you to deny a permit to GP to cap hazardous wastes on site and also deny the right to create a recreational trail under the current conditions.

S!

Signature on File

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SIGNATURES ON FILE

ADDRESSES

Tracy PO Box 277 Comptche Ca 95427
 [Signature] BOX 1718 MENDOCINO Ca 95460
 [Signature] 31860 O'Bayley dr. ^{Saint Barbara} 95437
 [Signature] PO Box 359 FT KAGB CA 95437
 [Signature] PO Box 926 SAN JOSE CA.
 [Signature] PO Box 643 ^{Alto} CA 95460
 [Signature] 298 VALLEY ST
 [Signature] WILKINS ST
 [Signature] Young (Cancer survivor) 45230 Fern Street
 [Signature] Mendocino, CA 95460
 [Signature] 533 Little Lake Rd Mendocino
 [Signature] 500 WISIAH ST. Mendocino
 [Signature] GREENBLATT P.O. Box 591 MENDO 95460
 [Signature] unblatt
 [Signature] PO Box 591 MENDO 95460
 [Signature] Alves
 [Signature] 32485 Pearl Dr., Fort Bragg CA
 [Signature] lea stedman 40201 Comptche rd, 95460
 [Signature] 40201 Comptche Rd CA 95460
 [Signature] PO Box 1355 Mendocino CA 95460

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P.O. Box 331 Mendo 95460

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PO Box 1789 mendo 95460

PO Box 1527 Mendo 95460

PO Box 2539, Mendo, 95460

Box 1161 Fort Bragg CA 95437

Box 383 Mendocino CA 95460

PO BOX 1413 FORT BRAGG, CA 95437

CANCER SURVIVOR

1 A. CTT

29016 Hwy 20 ^{CA} 95437

Gen. Delivery Mendo

Box 56 Caspar, CA. 95420

P O Box 813 Mendocino CA 95460

P O Box 813 Mendocino CA 95460

POB 452 Albany, CA 95410

P.O. Box 331 Mendo 95460

PO Box 1789 mendo 95460

PO Box 1527 Mendo 95460

PO Box 2539, Mendo, 95460

Box 1161 Fort Bragg CA 95437

Box 383 Mendocino CA 95460

PO BOX 1413 FORT BRAGG, CA 95437

CANCER SURVIVOR

1 A. CTT

WHAT'S THE RUSH?

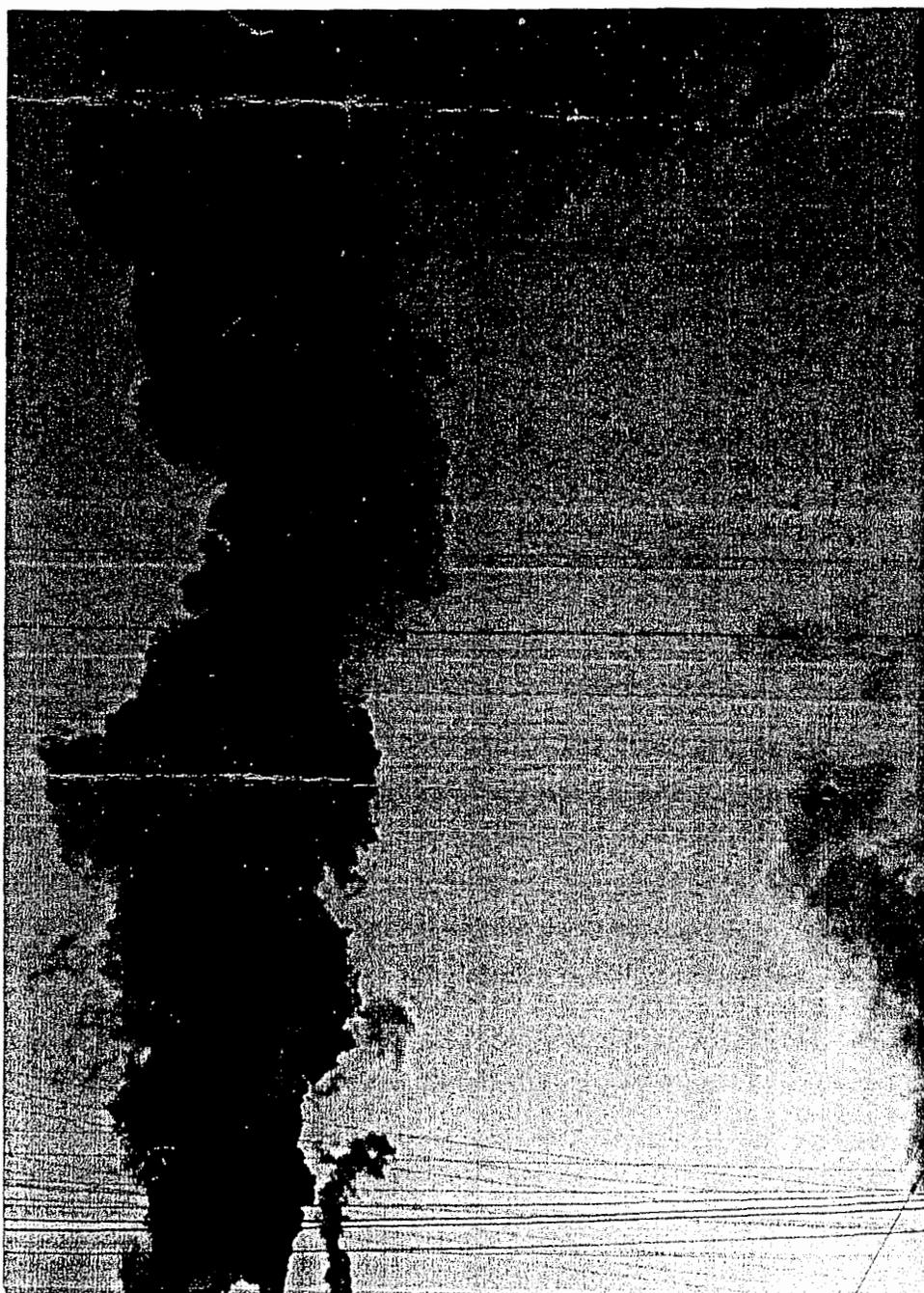
A PETITION TO DELAY ACQUISITION OF THE COASTAL TRAIL

We the undersigned ask the Department of Toxic Substances Control and the City of Fort Bragg to delay the planned remediation of and then acquisition of the Coastal Trail and Parkland from Georgia Pacific. It has become clear that we do not yet have all of the information needed to ensure a safe and full remediation of this property, and we favor care over haste.

NAME	PRINT NAME	ADDRESS	E-MAIL/PH#
1. <i>Jessica</i>	UMS	PO BOX 470 MENDO	Jessica.lade@hotmail.com
2. <i>Elias</i>	back	PO Box 967 MENDO	eliassteinback@comcast.net
3. <i>Lu</i>	Alec	14975 410 Blvd, Coypu	
4. <i>Anni</i>	Annelle Bow	43151 Little Lake, Mendo 95460	@isela@me.com
5. <i>[Signature]</i>	Wendy	POB 1295 Mendocino 95460	
6. <i>[Signature]</i>	Volk	Box 78 Coypu, CA	Yinyang@me.com
7. <i>[Signature]</i>	LARK-MELESEA	POB 1341 Mendo	
8. <i>[Signature]</i>	"	PO Box 31000 N Hwy 1 F.B.	
9. <i>[Signature]</i>	"	31100 No Highway 1 Fort Bragg	
10. <i>Charisse</i>	PO Box 1303	Mendo	sikimaria@hotmail.com
11. <i>Swan</i>	PO BOX 2103	Albion	tofusup@men.org
12. <i>Jack</i>	373 Cypress street,	FB,	
13. <i>Maria</i>	30150	Simpson Ln FB	
14. <i>Anna</i>	Rudiger	POB 335 Albion	95410 415-389-5979
15. <i>Pete</i>	7a	543 N. Franklin St. F. Bragg CA	95437
16. <i>[Signature]</i>	[Signature]	PO Box 547 Albion CA	
17. <i>[Signature]</i>	SHEEP	PO Box 512, LITTLE RIVER, CA	95456 michael@short.com
18. _____			

SIGNATURES ON FILE

SIGNATURES ON FILE



G.P. smoke stack Taken in
1990 from Cypress St.

Ju Signature on File *lu*
AKA *OR*

Jan. 6, 2009

To whom it may concern:

I am writing to oppose the plan to move and cap contaminated soil from the Georgia Pacific Mill site, permit # A1FTB05053A6. The dump site is wrong - too close to the ocean and to Fort Bragg - leading to potential problems long after the "responsible parties" are gone from the scene. Anyway, the process is happening too soon. I am in favor of thoroughly investigating the bio-remediation potential for cleaning up the site. If the soil is dumped and "capped" this can never happen, and the problem will just be pushed on to another generation. There is no reason why the soil has to be dumped in the coastal zone at all. This is a bad plan, which removes the possibility of a good plan from the table.

Sincerely,



Signature on File

Lisa

PO Box 1176

Willits, Ca 95490

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JAN 09 2009

CALIFORNIA
COASTAL COMMISSION

127 of 210

January 6, 2009
Meadow, CA

North Coast District Office
Bob Merrill, District Manager
710 E Street, Suite 200
Eureka CA 95501

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JAN 09 2009

CALIFORNIA
COASTAL COMMISSION

Dear Folks,

I ask that the CALIFORNIA COASTAL COMMISSIONERS DENY PERMIT A-1-FTB-05-053-A6 TO THE APPLICANT GEORGIA PACIFIC.

Many of us in the Ft. Bragg area are concerned about the proposed capping of 13,000 cubic yards of contaminated soil on 1.5 acres on the Georgia Pacific Corporation property in the town of Ft. Bragg, and located in the coastal zone. The storing of toxic contaminated soil underground in the coastal zone is not a Coastal Dependent Activity as defined in the CA Coastal Act.

Permitting a major corporation to bury toxic soil on the coast could leave a dangerous legacy for future generations.

Since the proposed site for the consolidation cell is a few hundred yards from the ocean, 6' below the surface, we are concerned that RISING SEA LEVELS, or possible LARGE WAVES COULD BE A PROBLEM,

According to the EPA, there are no safe exposure levels of the dioxins and furans found in the soil. Dioxins can cause BIRTH DEFECTS, MISCARRIAGES, and BRAIN TUMORS AMONG OTHER SERIOUS HEALTH EFFECTS. Redwood bark burned in the "Power House" on the millsite was sprayed with PENTACHLORO PHENOL which creates dioxins when burned, resulting in contaminated fly ash in the soil.

Capping the 13,000 cubic yards could set a precedent for more capping in the future of the rest of the contaminated soil on the site.

We ask that IF CAPPING IS DONE, IT IS TEMPORARY ONLY and THAT THE SOIL BE REMEDIATED ON SITE USING MYCO-REMEDIATION - USING FUNGUS.

This is a proven bio-remediation method used VERY SUCCESSFULLY BY PAUL STAMETS in various parts of the world including for oil spills. He and Dr. Jack Ward (who is currently overseeing a MYCO-REMEDIATION BENCH TEST for the site) are proposing a 12-week test period. PLEASE GIVE THIS SAFE, EXCITING PROVEN METHOD A CHANCE TO HAPPEN HERE.

THANK YOU.

Sincerely,

Re

Signature on File

[Handwritten signature]

Mendocino, CA

[Handwritten signature], CA

ELIC CA Box 4
Jan 6, 2009

Dear NC office
Coastal Commission,

I'm writing to request that you deny approval for the permit to cap diorite contaminated soils in the CA Coastal Zone. We need more information about whether the materials will have a life span beyond 30 years.

I urge you to not approve permit A1 FT B05053A6.

This is a good opportunity to protect our tourist business & possibly work towards solutions using bio-remediation & myco-remediation.

Thank you

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JAN 09 2009

CALIFORNIA
COASTAL COMMISSION

Signature on File

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JAN. 6th, 09

California Coastal Commission
North Coast District Office
Bob Merrill, District Manager
710 E Street, Suite 200
Eureka, CA 95501

Re: Permit A-1-FTB-05-053-A6

Please vote against the GP and city of Fort Bragg amendment to overthrow their previous agreement with the public.

The use of mushrooms- bio remediation on the dioxin contaminated soil at the GP site is such a potentially effective and break thru technology which needs time for testing by Dr. Jack Ward and company.

Please don't let GP and city rush this extremely sensitive and far reaching process.

David Gidley
Fort Bragg, CA


Signature on File

16100 SHANE DR.
FORT BRAGG, CA
95437
707-962-0669

THE FOLLOWING CITIZENS ALSO ENCOURAGE THE COASTAL COMMISSION TO STAND FIRM ON THE USE OF BIO-REMEDIATION AT THE CONTAMINATED GP SITE.

Signature on File

15815 Shane DR. I Also Agree with
Fort Bragg Co. 95437 The Above Statement.

RECEIVED

JAN 12 2009

CALIFORNIA
COASTAL COMMISSION

Bob Merrill

From: Paul Clark [pclark@mcn.org]
Sent: Tuesday, January 06, 2009 3:14 PM
To: Bob Merrill
Subject: PERMIT A-1 FTB-05-053-A6

- Georgia Pacific Application
- DTSC and the City have already approved the OU-A RAP, and implementing it is a very important step toward opening our coastline to the community and the entire 415-acre mill site to businesses and visitors that can in turn bring much-needed redevelopment and revenue to our area.
- I have lived and worked in Fort Bragg for 32 years and trust the DTSC and others to do their job and oversee the safe and effective cleanup of the mill site.
- I support approval of the Coastal Development Permit so the cleanup of OU-A can begin immediately

Please discount the nay Sayers that will go to no length to keep ANY development on the GP Mill site.

Thank You

Paul Clark
Century 21 Fort Bragg Realty
809 North Main Street
Fort Bragg, Ca. 95437

707-964-0811 Voice
707-964-5022 Fax
pclark@mcn.org

7 January 2009

P. O. Box 286
Mendocino, CA 95460

California Coastal Commission
North Coast District Office
Bob Merrill, District Manager
710 E Street, Suite 200
Eureka, CA 95501

RECEIVED

JAN 08 2009

CALIFORNIA
COASTAL COMMISSION

Re: Permit A-1-FTB-05-053-A6, Georgia-Pacific Corporation

Dear Mr. Merrill, North Coast District Staff, and California Coastal Commissioners:

I request and strongly urge you to reject, in its current form, the proposed Coastal Development Permit amendment application from the Georgia-Pacific Corporation. The proposed amendment to cap toxic wastes on-site (the Georgia-Pacific mill site in Fort Bragg) fails to provide protection from irreparable harm to the coastal terrestrial and marine environments, and fails to provide for the health and safety of coastal Mendocino residents and visitors to the area. The amendment also represents yet another attempt by the Georgia-Pacific Corporation to renege on its promises and put its financial interests ahead of those of health and security for the Fort Bragg community.

Specifically, the proposed amendment must include a stipulation that allows adequate time for the completion of mycoremediation trials, or "bench-tests," of the fungi and the techniques that could provide an environmentally sound and sustainable solution to toxic waste contamination. The satisfactory completion of such testing would delay further activities at the mill site by a scant few months, inconsequential in consideration of the environmental and human health concerns at issue. Whether successful in demonstrating functional remedial capability by fungi or not, these tests are an example of scientific process that provide a foundation for human achievement and provide solutions to just these very types of environmental and health concerns. Denying the time required for the completion of these tests would represent a grave insult to reason, rationality, and science. I recommend a minimum of 6 months to allow the completion of adequate bench-testing.

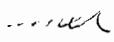
Furthermore, Georgia-Pacific Corporation has already established an indelible record, in this community and elsewhere, of betrayal, misinformation, and deceit in its ignominious history of plundering the Mendocino Coast for its profit. Its corporate management spokespersons deny the toxicity of the incinerated wastes from its mill, even as physical evidence and personal testimony demonstrate otherwise. The burning of such wastes has left the community with a legacy of environmental contamination and human cancer and other illnesses – any sense of justice would deny Georgia-Pacific the opportunity to perpetuate this legacy through on-site burial of wastes. Not insignificantly, the corporation promised this community to fund, adequately so, the mycoremediation trials for contaminated soils. The corporate representatives must not be allowed to erode further the public trust, and must be kept to their word to finance the bench-testing. I suggest that the Georgia-Pacific Corporation or its parent company, Koch Industries, provide a minimum of \$200,000 to the NewFields laboratory or other qualified scientists for the completion of the remediation trials.

The current permit amendment application process represents an opportunity for the California Coastal Commission to require the Georgia-Pacific Corporation to take responsibility for its actions – late is better than never. The denial of this permit amendment, or otherwise the attachment of specific language requiring the completion of adequately funded mycoremediation trials prior to temporary storage in a secure enclosure on-site (not near the ocean or known aquifers), would provide some evidence to the Mendocino coastal community that environmental protection, human health and safety, and scientific process will be respected and honored. The safety of the community and adherence to all due environmental safeguards must be prioritized over arguments that only serve the financial interests of the Georgia-Pacific Company. Please consider the ramifications – legal, medical, and otherwise – of setting precedent by allowing the on-site burial of toxic wastes. This land was taken by Georgia-Pacific for its financial gain, but it is the community that has borne the toxic results of the corporation's negligence. The time has long since passed when the tide must turn against the poisoning of the land upon which we live.

Thank you and the California Coastal Commissioners for your consideration.

S:

Signature on File


Peter J. Warner
Botanist and Ecological Consultant

California Coastal Commission
North Coast District Office Suite 200
710 E Street Eureka Ca 95501
REF # A1 FBC05053 A6

1-7-9

Dear Mr Merrill

To expediate public input into the permit process given the short amount of time allowed, I authored the enclosed petition and discussed in length all of the points mentioned with each of the signers

To reiterate the most important point of community safety - without a health study now - before a permit is issued we can have no way of assessing the future impact of disturbed contaminated soil on the health of the community. We also have no way to ensure that monitoring activities are achieving their goal of protection. This is especially important in regard to the children and yet unborn of the community.

In addition, a tourist economy and a toxic site are like oil and water. They don't mix ^{nor} ~~and~~ make for good Partnership

P.S. Also included are
signatures collected
by Ms Mary Walsh.
and a picture of the
GP mill site smokestack
in the 90's.

Signature on File



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JAN 09 2009

CALIFORNIA
COASTAL COMMISSION

Parents for Healthy Communities
Box 69, Caspar, CA 95420
lnslmccn.org

January 7th, 2009

North Coast District Office
Bob Merrill, District Manager
710 E Street, Suite 200
Eureka, CA 95501

RECEIVED

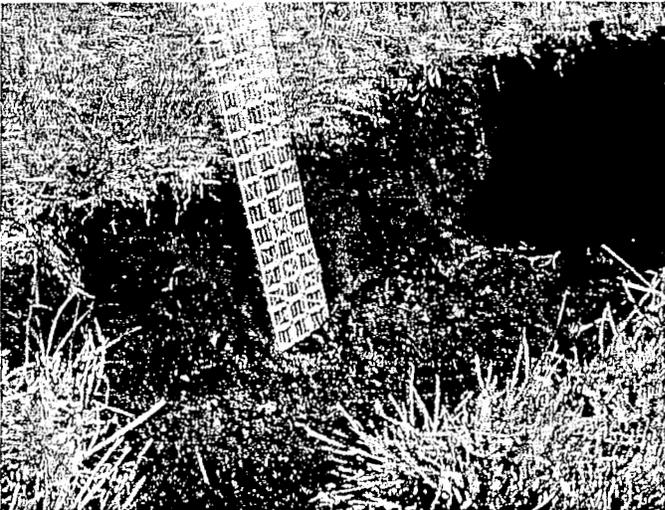
JAN 09 2009

CALIFORNIA
COASTAL COMMISSION

Dear Mr. Merrill,

This letter is requesting that the California Coastal Commissioners deny permit A-1-FTB-05-053-A6 to the applicants Georgia-Pacific Corporation.

I'm working mother who I coaches soccer and teaches fiber arts to kids. I've lived on the Mendocino coast for 25 years and became involved in this issue several years ago when I learned that the soccer field at our local school contains dioxins from fly ash from the Georgia Pacific Mill site.



Black layer of flyash clearly visible in 4" band at surface – Mendocino High School soccer field, Mendocino, CA.

The Human Health toxicologist at the Department of Toxic Substances Control (DTSC) informed me that the levels of dioxin on the field are below the 4.6 legally allowable level for residential use, so Georgia Pacific is not legally required to clean up the field even though, according to the EPA, there is no safe level for dioxins.

The Human Health toxicologist also told me to make sure the kids washed off "within hours" after playing soccer, and make sure they wash their hands before eating.

How does this relate to capping on the Mill site?

Capping leaves a toxic legacy for future generations, and does nothing to begin to alleviate problems with off-site contamination from flyash.

As a community, we are opposed to capping on the Mill site because:

- Welded seams in liner only have a 30 year lifespan.
- Bottom of proposed cell liner is only 6ft above current water table.
- Bluffs are vulnerable to erosion, tsunamis, and earthquakes.
- Headlands are a sensitive habitat.
- Even during drought conditions water seepage was clearly flowing from direction of proposed cell site, out of caves below the bluffs.
- Georgia Pacific has set aside **9 acres** for capping.
- Proposed capped site is slated for redevelopment and destined to become the new "downtown" area.
- Future redevelopment around, and even possibly on top, of the capped site will make attending to any future clean up attempts infinitely more challenging.
- Site will require constant monitoring for 50-100 years. Who will cover the cost?
- It will negatively impact our local tourist economy.

At the last DTSC public meeting in Fort Bragg only one person spoke in favor of capping, while over 200 community members came and spoke in favor of bioremediation or soil removal.

According to historical records and reports from past employees, G-P burned materials in the powerhouse both legally and illegally, and, reportedly, none of the fly ash leaving the site was ever tested for dangerous contaminants.

Touted as a "soil amendment" by Georgia Pacific, and considered cheap fill, this material was given away to members of this community over a span of decades. Given to our schools to build ball-fields, used in Albert's Best compost, for many years *the* local compost, as well as stockpiled in open, football field (or bigger) sized piles at off-site locations on Little Valley Road, Pudding Creek and Simpson Lane.

Bioremediation is very much favored in our community because:

- Would provide a long-term, sustainable solution to a huge toxic problem.
- It would give us a chance to develop the technology to deal with offsite contamination in local gardens, farms and playing fields.
- We would prefer not to contaminate other communities.
- Hauling thousands of truckloads of contaminated soil would present a risk to others en route, and have a high carbon footprint.
- We like the possibility of a future local economy stimulated by bioremediation technologies and skills that can help others.
- It would enhance rather than detract from our tourist economy. (We want our visitors, and our kids, to feel - and be - safe drinking our water and splashing in our tide pools.)

Georgia Pacific profited by using up our community's natural resources, and now they would like to walk away with the cheapest possible clean up: burying their toxic waste on site.

Please protect our town, our kids and our coastal habitat by supporting our request for bioremediation, or soil removal, instead of capping.

Thank you for your attention,

Lenora Shepard

Owen Edwards

907 N Oak Street
Ukiah, CA 95482
January 7, 2008

Mr. Bob Merrill, Director
North Coast District Office
California Coastal Commission
710 East St., Suite 200
Eureka, CA 95501

Re: A1FTB05053A6
Remediation of Toxic Wastes at GP Mill Site, Ft. Bragg

Dear Commissioners and Staff:

I have heard about the proposal to store and cap toxic wastes at the Georgia-Pacific Mill site in Ft. Bragg. I oppose this proposal and I urge you oppose it also. To simply bury and cap the toxic wastes at this former industrial site would not guarantee the safety of the local public from them indefinitely. I support whatever action that you think best to actually detoxifying the waste and contaminated soil before it is placed anywhere for all foreseeable time, the only truly permanent solution to the problem.

One possible way to detoxify the waste and the contaminated soil is via the use of bioremediation techniques. I urge you to support the use of such techniques to clean up the old mill site. To do so could become a model for future cleaning of other contaminated industrial sites, and a giant step toward a less toxic future for the general public.

Sincere regards,

RECEIVED

JAN 12 2009

CALIFORNIA
COASTAL COMMISSION

Signature on File

Antonina Esposito

907 N Oak Street
Ukiah, CA 95482
January 7, 2008

Mr. Bob Merrill, Director
North Coast District Office
California Coastal Commission
710 East St., Suite 200
Eureka, CA 95501

RECEIVED

JAN 12 2009

CALIFORNIA
COASTAL COMMISSION

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One possible way to detoxify the waste and the contaminated soil is via the use of bioremediation techniques. I urge you to support the use of such techniques to clean up the old mill site. To do so could become a model for future cleaning of other contaminated industrial sites, and a giant step toward a less toxic future for the general public.

Sincere regards,

Signature on File *ms*

Stephen Scalmanini

Bob Merrill

From: Chuck Tell [rctell@yahoo.com]
Sent: Wednesday, January 07, 2009 5:37 PM
To: Bob Merrill
Subject: GP Mill Site, Fort Bragg, California

INFORMATION IN SUPPORT OF COASTAL
COMMISSION
PERMIT A-1 FTB-05-053-A6

Bob
Merrill, District Manager
California
Coastal Commission
North
Coast District Office
710
E Street, Suite 200
Eureka,
CA 95501

Mr. Merrill

Since the mill closed in 2002, Georgia-Pacific has been working with the appropriate agencies on full investigation and cleanup of the mill site. DTSC has reviewed every action taken on the site and will continue to do so. They are experts in these matters and only approve those actions that will protect and improve the environment. After public review and public meetings, DTSC and the City approved the RAP for cleanup of the Coastal Trail and Parkland (OU-A), including onsite management of soils containing low levels of dioxins in a containment cell system.

The containment system includes a durable 40-mil PVC liner that will form an impermeable barrier to isolate the soil from the environment and all contact with people or wildlife (compare this to a grocery sack, generally 1-mil thick, that is being banned in many places because it is said to "never break down in a landfill"). Additional liners and layers of topsoil and vegetation will be placed on top of the cell to prevent rainwater from entering and to guard against burrowing animals.

Groundwater around the containment cell will be monitored to make sure contamination doesn't leave the cell. Indeed, dioxins bind so tightly to soil that they would not likely impact groundwater even without the added protection of the liners and other precautions built into the cell's design. Also, the cell is situated more than 1,000 feet from the coastline in an area with at least five feet between the bottom of the cell and the water table.

The use of the containment cell makes sense. The presence of the cell will not prevent future land use around or even on top of the 1.5-acre footprint. Alternatives to onsite management include bioremediation, but such treatment for dioxins is still theoretical and not a proven technology, particularly on a large scale or in the coastal weather conditions of Fort Bragg. Georgia-Pacific has shown its willingness to use bioremediation where feasible, and is currently using bioremediation to clean tons of petroleum-contaminated soil at the mill site. In addition, the company is working with DTSC and the City to look into research on other forms of bioremediation that may be useful if proven effective and compliant with regulations. However, until such time as bioremediation or some other form of treatment is developed, putting the soil in the cell on site is much more efficient and safe than sending truckloads of soil with low levels of dioxin over hundreds of miles of local roads.

Some concerns regarding mill site beaches and the ocean were raised in the course of developing the OU-A RAP. Sampling was conducted in the near and off shore areas and the results indicated that our beaches and the ocean are safe for public recreation and the sea creatures that live there. The OU-A RAP, once implemented, will further assure the protection of these areas and preserve these important resources.

DTSC and the City have already approved the OU-A RAP, and implementing it is a very important step toward opening our coastline to the community and the entire 415-acre mill site to businesses and visitors that can in turn bring much-needed redevelopment and revenue to our area.

I have lived and worked in Fort Bragg for 39 years and trust the DTSC and others to do their job and oversee the safe and effective cleanup of the mill site. In fact, I currently work at the mill site, and I feel perfectly safe with all that has been done to mitigate any environmental concerns.

I support approval of the Coastal Development Permit so the cleanup of OU-A can begin immediately.

Sincerely,
Rodney C. Tell

Bob Merrill

From: Dan Van Pelt [d_e_vanpelt@hotmail.com]

Sent: Wednesday, January 07, 2009 4:07 PM

To: Bob Merrill

We support approval of the Coastal Development Permit so the cleanup of OUA-A can being immediatley.

Dan and Esther Van Pelt (residents for 55 years)

Windows LiveTM: Keep your life in sync. [Check it out.](#)

SUPPORT OF COASTAL COMMISSION
PERMIT A-1 FTB-05-053-A6

Bob Merrill, District Manager
California Coastal Commission
North Coast District Office
710 E Street, Suite 200
Eureka, CA 95501

Dear Bob:

As residents and business owners in Fort Bragg, we support granting permit A-1 FTB-05-053-A6 on the former Georgia Pacific Mill Site.

Key reasons to support the Coastal Commission permit:

- Since the mill closed in 2002, Georgia-Pacific has been working with the appropriate agencies on full investigation and cleanup of the mill site. DTSC has reviewed every action taken on the site and will continue to do so. They are experts in these matters and only approve those actions that will protect and improve the environment. After public review and public meetings, DTSC and the City approved the RAP for cleanup of the Coastal Trail and Parkland (OU-A), including onsite management of soils containing low levels of dioxins in a containment cell system.
- The containment system includes a durable 40-mil PVC liner that will form an impermeable barrier to isolate the soil from the environment and all contact with people or wildlife (compare this to a grocery sack, generally 1-mil thick, that is being banned in many places because it is said to "never break down in a landfill"). Additional liners and layers of topsoil and vegetation will be placed on top of the cell to prevent rainwater from entering and to guard against burrowing animals.
- Groundwater around the containment cell will be monitored to make sure contamination doesn't leave the cell. Indeed, dioxins bind so tightly to soil that they would not likely impact groundwater even without the added protection of the liners and other precautions built into the cell's design. Also, the cell is situated more than 1,000 feet from the coastline in an area with at least five feet between the bottom of the cell and the water table.
- The use of the containment cell makes sense. The presence of the cell will not prevent future land use around or even on top of the 1.5-acre footprint. Alternatives to onsite management include bioremediation, but such treatment for dioxins is still theoretical and not a proven technology, particularly on a large scale or in the coastal weather conditions of Fort Bragg. Georgia-Pacific has shown its willingness to use bioremediation where feasible, and is currently using bioremediation to clean tons of petroleum-contaminated soil at the mill site. In addition, the company is working with DTSC and the City to look into research on other forms of bioremediation that may be useful if proven effective and compliant with regulations. However, until such time as bioremediation or some other form of treatment is developed, putting the soil in the cell on site is much more efficient and safe than sending truckloads of soil with low levels of dioxin over hundreds of miles of local roads.
- Some concerns regarding mill site beaches and the ocean were raised in the course of developing the OU-A RAP. Sampling was conducted in the near and off shore areas and the results indicated that our beaches and the ocean are safe for public recreation and the sea creatures that live there. The OU-A RAP, once implemented, will further assure the protection of these areas and preserve these important resources.
- DTSC and the City have already approved the OU-A RAP, and implementing it is a very important step toward opening our coastline to the community and the entire 415-acre mill site to businesses and visitors that can in turn bring much-needed redevelopment and revenue to our area.
- I have lived and worked in Fort Bragg for 19 years and trust the DTSC and others to do their job and oversee the safe and effective cleanup of the mill site.
- I support approval of the Coastal Development Permit so the cleanup of OU-A can begin immediately.



From:
Ben Booth, LTC, USA (Ret.)

To: Bob Memmill,
District Manager,
CCC, N. Coast District
email: bmemmill@coastal.
ca.gov, 710 E St. Eureka, CA 95501

7 JANUARY 2009

16821 Ocean Drive,
Fort Bragg, CA 95437-8303

Tel: 707-964-9188

Fax: 707-964-3402

email: booth@mcn.org

Key reasons I support the Coastal Commission permit:

- Since the mill closed in 2002, Georgia-Pacific has been working with the appropriate agencies on full investigation and cleanup of the mill site. DTSC has reviewed every action taken on the site and will continue to do so. They are experts in these matters and only approve those actions that will protect and improve the environment. After public review and public meetings, DTSC and the City approved the RAP for cleanup of the Coastal Trail and Parkland (OU-A), including onsite management of soils containing low levels of dioxins in a containment cell system.
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- I have lived and worked in Fort Bragg for 33 years and trust the DTSC and others to do their job and oversee the safe and effective cleanup of the mill site.
- I support approval of the Coastal Development Permit so the cleanup of OU-A can begin immediately.

Most Emphatically,

Signature on File

Bob Merrill

From: Stephanie Berry [sberryc21@yahoo.com]
Sent: Wednesday, January 07, 2009 10:42 AM
To: Bob Merrill
Subject: [Possible Spam] Support of COASTAL COMMISSION PERMIT A-1 FTB-05-053-A6
Importance: Low

Dear Mr. Merrill,

I am writing in support of the Coastal Commission Permit A-1 FTB-05-053-A6.

- DTSC and the City have already approved the OU-A RAP, and implementing it is a very important step toward opening our coastline to the community and the entire 415-acre mill site to businesses and visitors that can in turn bring much-needed redevelopment and revenue to our area.
- I have lived and worked in Fort Bragg for 13 years and trust the DTSC and others to do their job and oversee the safe and effective cleanup of the mill site.
- I support approval of the Coastal Development Permit so the cleanup of OU-A can begin immediately.

Respectfully submitted,

Stephanie Berry
CENTURY 21 Fort Bragg Realty
809 N. Main Street
Fort Bragg, CA 95437
Direct Line: (707)964-2171
Cell: (707)367-2877
Fax: (707)964-3402
website: www.forthraggsrealestate.com

Bob Merrill

From: Susie Francis [suzy@mcn.org]
Sent: Wednesday, January 07, 2009 10:37 AM
To: Bob Merrill
Subject: Georgia-Pacific Site Clean up

I have lived and worked in Fort Bragg/Mendocino for 28 years and trust the DTSC and others to do their job and oversee the safe and effective cleanup of the mill site.

I support approval of the Coastal Development Permit so the cleanup of OU-A can begin immediately.

Susie Francis, Realtor
CENTURY 21, Fort Bragg Realty
707-964-2194

January 8, 2000

Dear Mr. Merrill,

I request that the Coastal Commissioners deny permit A-1-FTB-05-053-A6 to the applicants Georgia-Pacific Corporation.

I am very concerned about the capping of 13,000 cubic yards of contaminated soil on $1\frac{1}{2}$ acres of land on the G-P property in the heart of Fort Bragg & located in the sensitive Coastal Zone.

The storing of toxic contaminated soil under the ground in the Coastal Zone is not a Coastal dependent activity as defined in the Calif. Coastal Act.

I'm concerned about rising sea levels - The site is close to coastal bluffs. Per the EPA, there is no safe level of dioxin. Fly ash contaminated with fungicide is present in the mill site soil.

Please ask the Coastal Commission to mandate that G-P look for an alternative to remediate the dioxin-furan soil, & the capped contaminated soil would need to be remediated on site or removed.

Thank you. RECEIVED

JAN 12 2009

CALIFORNIA
COASTAL COMMISSION

Fra Signature on File
44847 Meadow Cude
Wendocino CA 95460

Edwin Nieves
Julie Drucker
621 Holden St.
Ukiah, CA 95482

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JAN 14 2009

CALIFORNIA
COASTAL COMMISSION

Permit A-1-FTB-05-053-A6

California Coastal Commission
North Coast District Office
Bob Merrill, District Manager
710 E Street, Suite 200
Eureka, CA 95501

January 8, 2009

Dear Mr. Merrill,

We are writing this letter in opposition to the current plan for the clean-up and capping of the Georgia Pacific Mill Site in Fort Bragg. It is our concern that the proposed method is inadequate and will result in additional health hazards.

As seaweed harvesters on the Mendocino Coast it is our experience that the cliffs along the coastline are porous. Springs, seeps and even rain run-off not only travel along the surface but also seep out of the ground at different heights above the median tide mark.

Any method of cleanup that calls for the accumulation of contaminated soil in one location increases the risk that higher concentrations of contaminants will seep into the water and into the ocean. The rupturing of the liner on the bottom of the pit would lead to those higher concentrations leaching into the ocean. Should the capping material along the surface break up (as with concrete or asphalt over time) rain water could enter the pit and eventually percolate back up to the surface running off to the ocean or back to the streets and into Fort Bragg's sewer systems.

We think that creating a toxic waste site along the Mendocino Coast is a poor precedent to set and ask that the Coastal Commission act to prevent it. We also ask that more consideration be given to the use of myco-remediation as a solution for the breakdown of the current toxic contamination into more benign compounds.

Sincerely, Julie Drucker and Edwin Nieves.



Signature on File



Signature on File



Bob Merrill

From: Claraekstrom@aol.com
Sent: Thursday, January 08, 2009 11:42 AM
To: Bob Merrill
Cc: carguy@pacific.net; pclark@mcn.org
Subject: RE: SUPPORT OF COASTAL COMMISSION PERMIT A-1 FTB-05-053-A6

Dear California Coastal Commission,

I am writing this letter to show my support for the containment cell that is being proposed for the GP property. I would admonish you all to listen to the people that support this project. I, personally, think that the delay that has occurred has been a tragedy for our town. Our town and its businesses are quickly deteriorating and developing the GP property is a sure way to bring growth and business back to our town. I have worked in this town for the last 20 years and was born here in Mendocino County and look forward to walking with my children on this beautiful part of the coastline that has been unavailable to me and my family. I feel confident in the DTSC and others to oversee the clean-up of the GP property so that this community can enjoy this renewable resource here in our town. I support the approval of the Coastal Development Permit so the cleanup of OU-A can begin immediately. Thank you for your consideration.

Sincerely,

Clara Ekstrom
1411 Taubold Court
Fort Bragg, CA 95437
(707)964-5336

A Good Credit Score is 700 or Above. See yours in just 2 easy steps!

Bob Merrill

From: Kirk O'Day [kirko@mcn.org]
Sent: Thursday, January 08, 2009 10:13 AM
To: Bob Merrill
Subject: Georgia Pacific Mill Site in Fort Bragg

Mr. Merrill,

I have lived on the Mendocino Coast for 8 years and worked in Fort Bragg for 6. During that time I have witnessed the economic degradation of the area due to the loss of reasonable paying jobs at the mill as well as those involved in fishing. It appears that for the foreseeable future Fort Bragg must rely on tourism as it's only viable product and the addition of a coastal trail on the towns western boundary will not only be an important feature for tourists, but it will also provide a ray of hope for the citizens of Fort Bragg who have all but given up on seeing any development on the mill site in the coming decade.

I strongly encourage you to support the current remedial action plan.

Yours truly,

Kirk O'Day
Mendocino, Ca

Bob Merrill

From: too:snak@mch.org
Sent: Thursday, January 08, 2009 7:43 AM
To: Bob Merrill
Subject: PERMIT A-1 FTB-05-053-A6

PLEASE SUPPORT OF COASTAL COMMISSION
PERMIT A-1 FTB-05-053-A6

I have lived and worked in Fort Bragg for 19 years and trust the DTSC and others to do their job and oversee the safe and effective cleanup of the mill site.

I support approval of the Coastal Development Permit so the cleanup of OU-A can begin immediat

Howard O. Brown
155 Dana St.
Fort Bragg, Ca. 95437

Bob Merrill

From: toolshak@mcn.org
Sent: Thursday, January 08, 2009 7:42 AM
To: Bob Merrill
Subject: PERMIT A-1 FTB-05-053-A6

PLEASE SUPPORT OF COASTAL COMMISSION
PERMIT A-1 FTB-05-053-A6

I have lived and worked in Fort Bragg for 15 years and trust the DTSC and others to do their job and oversee the safe and effective cleanup of the mill site.

I support approval of the Coastal Development Permit so the cleanup of OU-A can begin immediat

Mary Kathleen Brown
155 Dana St.
Fort Bragg, Ca. 95437

1/9/09

Loie Rosentkrantz co-founder
North Coast Action
17201 Franklin Road
Fort Bragg Ca 95437

California Coastal Commission
North Coast District Office
Bob Merrill, District Manager
710 E Street, Suite 200
Eureka Ca 95501

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JAN 1 2009

CALIFORNIA
COASTAL COMMISSION

Temporary
Permit, Capping
with
conditions

Re: Permit A-1-FTB-
05-053-A6

Dear Mr Merrill and Coastal Commission members,

Regarding the above referenced Permit both Georgia Pacific Corporation (Koch Industries) and the City of Fort Bragg have expressed their interest and support for testing microremediation techniques and G-P has offered to fund laboratory tests, for which a research proposal from NewFields Laboratory, DTSC + Paul Stamets is close to final form. (Please note enclosed material from + about the City of Fort Bragg and part of a letter from G-P indicating it is willing to fund \$60,800.00 for the testing.

As you are aware many citizens support and are anxious for there to be the exploration of microremediation - especially since the capping of the 13,000 cu yds would be very close to the ocean, although not at the edge. Please vote to support capping with these special conditions!

With Many Thanks for your public service,
155 of 210

New year, new meetings, familiar topics

Advocate Staff

Next month, the California Coastal Commission will hear and consider Georgia Pacific's permit application to consolidate and cap 13,000 cubic yards of dioxin-contaminated soil on the southern end of the former sawmill site.

Coastal Commission North Coast District Manager Bob Merrill said the February meeting is a continuation of the Dec. 10 meeting when commissioners chose to extend the meeting to allow staff to answer questions about the application.

"We hope they'll act and we'll be surprised if they don't," he said.

Merrill said the commission has already voiced its concerns about the application, and new staff reports should be sufficient to address them.

Public comments may be submitted to the commission to be included in the staff report. According to Merrill, comments received by Wednesday, Jan. 14 can be printed in the commission packet. Comments received by Feb. 2 can be forwarded to commissioners

for consideration.

The exact date and location of the meeting will not be known until about Jan. 14. Typically, Coastal Commission meetings take several days and North Coast District items are heard last.

The controversial issue of burying the soil in a sealed synthetic shell has been the subject of several City Council, Redevelopment Agency, Planning Commission and state Department of Toxic Substances Control meetings in Fort Bragg. Opinions vary about how to handle the dioxin-laden soil.

The city Redevelopment Agency (also serving as the City Council), under the authority of the Polanco Redevelopment Act, opted to approve a workplan to bury the soil onsite, rather than haul it to a landfill in King's County. Members of the public were somewhat divided on the issue, but many supported the exploration of using mushrooms, called mycoremediation, to treat dioxin-contaminated soil. Redevelopment Agency members expressed willingness to unearth and treat the buried soils in the future, if testing

proves mycoremediation to be effective.

Last summer, G-P used two bioremediation techniques to treat petroleum-contaminated soils and groundwater which should not be confused with mushroom bioremediation.

Mill Site Specific Plan Workshop

City and G-P officials will host the second mill site specific plan workshop Wednesday, Jan. 14 presented by RRM Design Group. A Nov. 12 workshop introduced RRM team members and gave attendees a chance to meet and question them about the specific plan process.

Workshops are designed to allow opportunities for public input about the future redevelopment of the 415-acre oceanside property.

Attendees will discuss the opportunities and constraints of specific study areas, brainstorm about redevelopment ideas, help develop conceptual land use plans and ask questions about the process.

The three-hour meeting starts at 6 p.m. and will take place at the Eagles Hall Theater, 210 N. Cory Street in Fort Bragg.

F O R T B R A G G
R E D E V E L O P M E N T A G E N C Y



416 N. FRANKLIN STREET ■ FORT BRAGG, CA 95437
PHONE 707-961-2828 ■ FAX 707-961-2802

*please
note
item #5
next page →*

April 29, 2008

Department of Toxic Substances Control
Site Mitigation Program- Cleanup Operations
700 Heinz Avenue, Suite 200
Berkeley, CA 94710
ATTN: Ed Gillera

Subject: Georgia Pacific Wood Products Facility, Fort Bragg, CA
Draft Final Operable Unit A Remedial Action Plan & Feasibility Study
Draft Final Interim Action Remedial Action Plan & Feasibility Study

Dear Mr. Gillera,

The Fort Bragg Redevelopment Agency is actively involved in overseeing the site characterization and cleanup process for Georgia Pacific's Fort Bragg Mill Site (i.e., "the Mill Site"). The Mill Site is located entirely within the Fort Bragg Redevelopment Project Area and represents the single largest development opportunity site in Fort Bragg and on the northern California coast. The Agency is very interested in ensuring that the site characterization and remediation processes for the Mill Site are thorough and result in the timely cleanup of the site to a condition that is safe for future redevelopment. To this end, the Agency has entered into an Environmental Oversight Agreement with the Department of Toxic Substances Control (DTSC) that defines a cooperative working relationship to address the Mill Site in compliance with DTSC's Site Investigation and Remediation Order to Georgia-Pacific Corporation and with the Polanco Redevelopment Act (Cal. Health & Safety Code sections 33459-33459.8).

The Agency has retained the services of an environmental consultant (Glenn Young of Fugro-West) and a toxicologist (Mark Stelljes of SLR International Corp.) to provide technical review of the site characterization and remediation process. Mr. Young and Mr. Stelljes, along with the Agency's Executive Director and the City's Community Development Director have actively participated in DTSC's on-going monthly agency meetings to review the work plans, risk assessment, and Remedial Action Plan(s) for the site.

For the past year, much of the focus has been on Operable Unit A (the "Coastal Trail & Parkland" parcels) and the resource and regulatory agencies have worked with the City and Georgia-Pacific to facilitate the timely clean-up of the Coastal Trail & Parkland parcels to allow for their acquisition by the City of Fort Bragg with a \$4,165,000 grant from the State Coastal Conservancy and the future development of coastal access facilities with a \$750,000 federal appropriation obtained through Congressman Mike Thompson's office. The Redevelopment Agency greatly appreciates the considerable efforts that have been made by DTSC's staff to work within the timeframes of the grant and we remain very committed to completion of the Coastal Trail & Parkland acquisition.

The Agency has discussed the site investigation and characterization and remedial options under consideration for the Coastal Trail & Parkland parcels as well as the proposed Interim Actions at six public meetings (October 22, 2007; November 7, 2007; February 25, 2008; March 27, 2008; April 14, 2008; and April 28, 2008). On April 28, 2008, the Agency reached the following general conclusions regarding the two RAPs:

- (1) The Agency supports the proposed land treatment of soil and in situ treatment of groundwater, along with limited removal and offsite disposal of contaminants, as proposed in the Draft Final Interim Action RAP.
- (2) The Agency supports the use of a "recreational use" scenario for establishment of clean-up goals for Operable Unit A, as the City intends to acquire and maintain the property for coastal access and passive recreational uses.
- (3) The Agency supports the consolidation and capping of soils with dioxin from Operable Unit A in the location described in the RAP.
- (4) The Agency does not view its support for consolidation and capping of contaminants from Operable Unit A as precedent-setting for consolidation and capping of contaminants elsewhere on the Mill Site and expects that any future proposals will be evaluated on a case-by-case basis.
- (5) The Agency is supportive of the use of bioremediation technologies in future RAPs to address contamination on the Mill Site. Georgia-Pacific has offered its support for bioremediation and restoration studies by funding a "bench test" study by Paul Stamets (if approved by DTSC) to test possible degradation of dioxin and other contaminants with mycoremediation techniques. GP has also offered "in kind" contributions to assist the community with future bioremediation studies and restoration activities (i.e., access to and use of the greenhouses for plant propagation and use of an adjacent shed for bioremediation investigations for five years; limited technical consultation with Arcadis staff and coordination with DTSC and OPPTD staff, as needed). Further bioremediation studies may be funded by brownfield grants offered by the Environmental Protection Agency, the CalReUSE program (Prop 1B), the Center for Creative Land Recycling's Project Learning Program, and other funding sources.

The Agency looks forward to receiving and reviewing the Response to Comments document for the Operable Unit A and Interim Action RAPs that is being prepared by DTSC. Following receipt of the Response to Comments document and the final RAPs, the Agency will take formal action on the RAPs under the Polanco Redevelopment Act. If you have any questions, please feel free to call Fort Bragg Redevelopment Agency Executive Director, Linda Ruffing, at (707) 961-2923.

Signature on File

Doug Hammerstrom
Chair

Signature on File

Core Melo
Boardmember

Signature on File

Meg Courtney
Boardmember

Signature on File

Dave Turner
Boardmember

Signature on File

Dan Gjerde
Boardmember

Fort Bragg Dioxin Proposal

analyzed only when the performance criteria are met for composited samples. Strategically, this will result in a statistically rigorous dataset in the most cost-effective manner.

Deliverable: Data report on all aspects of mycoremediation trials. (See Task 5)

Task 4 Analytical Chemistry

Laboratory samples will be composited and submitted for chemical analysis to a laboratory that specializes in dioxin/furan analysis. The laboratory will use USEPA Method 1613. The number of samples analyzed depends on the results of the baseline analysis and on the outcome of the data from one composite sample of each fungal species at test termination. For this scope of work the number of analytical samples will be 12. Future work can be done separately to look at the replicates, with up to 132 samples depending on how many fungal species (proposal based six fungus/wood treatments) are tested and how many archived samples will analyzed for each fungal treatment.

Task 5 Reporting and Recommendations for Field Application

After all results are received, statistical analyses completed, and all evaluations made, NewFields will prepare draft and final reports. These will include summaries of all activities associated with collecting, compositing, and chemically analyzing soil samples.

The design for the field application will be developed based on results of the laboratory and mesocosm experiments; it is not included in our statement of work at this time.

Preliminary Cost Summary

Task Name and Number	Cost for Task
1. Detailed Work Plan	5.0 K
2. Fungal Candidate List	1.6K
3. Laboratory Experiments	
Experiment 1	15 K
Experiment 2	20 K
Experiment 3, excluding chemistry	?? (remove bioassays)
4. Analytical Chemistry	
6 composite, start and end @ \$1,000 per sample	12K /
5 replicates at start and end for 2 species	[20K - additional, if needed]
5. Reporting and Preliminary Recommendations for Field Application	7.2 K

Comment (rjh:19):

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Comment (rjh:20): GP will only fund the initial 12 samples

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60.8 K

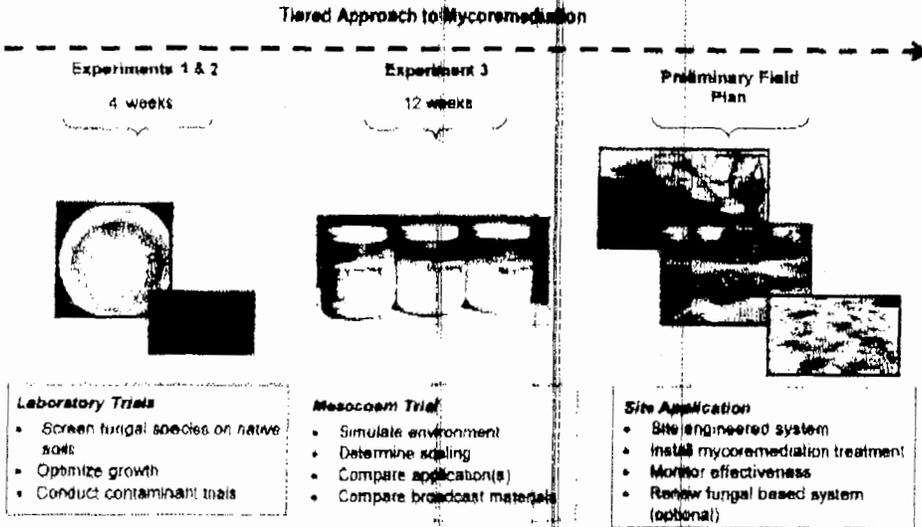
vs. 85.8 K orig

GP commitment to spend \$60,800.- vs. \$85,800.- originally for mycoremediation

Fort Bragg Dioxin Proposal

Timeline

A timeline of experiments is presented in the following figure.



Fort Bragg Cleanup Proposal

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Proposal to Remediate Dioxin Contamination from Soils, Sediment and Ash at the G-P Site, Fort Bragg CA

Statement of Project Objectives: The overall remediation goal is to reduce the soil/sediment concentration of dioxin equivalents (TEQ) at the G-P Fort Bragg site to the Residential Primary Remediation Goal (PRG) of 3.9 $\mu\text{g/g}$ TEQ. A dioxin data summary indicates that contaminated substrate materials are soils, sediment, and ash stockpiles exceed this PRG in 16%, 54%, and 100% of samples, respectively. Maximum-recorded concentrations are in the range of 1700 $\mu\text{g/g}$ TEQ (Fugro, 2006). NewFields is proposing a plan to reduce these contaminant levels using mycoremediation technology. We propose a tiered series of laboratory and mesocosm studies with performance criteria set forth for each experiment. The performance criteria will be evaluated by the project team and will serve as a guide for designing and conducting all incremental experiments as well as future field-scale application of this technology. We are optimistic that appropriate fungal species can be identified that are compatible in degraded redwood impacted substrates and that are capable of using dioxin-contaminated materials as a food source, thereby degrading the chemical compounds (Table 1). Past successful mycoremediation experiments conducted with other complex ring-structured contaminants have accomplished well over a 50% reduction in contaminant loads during relatively short time periods of ~12 weeks. Moreover, since the period of fungal activity corresponds to the mycelium life cycle, it would be possible to further reduce contaminant concentrations by recharging the mycelium exposure in mesocosm or field applications and augmenting bioremediation effectiveness through repeated fungal life cycles or use of additional fungal 'keystone' species.

g-p comments
in this
column
↓
Comment [rjh1]: Cite CA screening
level (CHHSL), not EPA PRG.

The approach used for selection of fungal species involves the examination of the contaminant of concern, including chemical structural points of biological attack that foster the destruction of the molecule rather than removal of chemical side chains. The next step is to compare this contaminant to natural chemicals with similar structure and to literature references that indicate potential success of fungal remediation with the selected contaminant. The objective is to determine which species of fungi may be native to the site, are capable of growing in soils containing redwood and are capable of degrading naturally occurring compounds similar in chemical properties to dioxins in order to drive the degradation pathway toward destruction of the benzene ring structure rather than removal of side branches of chlorine molecules (reductive dechlorination). Currently, fungal species/strains are selected from our fungal library that is a repository of more than 300 fungal species with known growth characteristics and degradation properties. We have also reviewed species that naturally occur in redwood forested areas of northern California coast, and will include species that may enhance site-specific performance characteristics in this environmental substrate.

We have divided this mycoremediation project into a tiered series of experiments that will result in the identification of species/strains that will be effective at remediating dioxin contamination at Fort Bragg. The experiments and corresponding specific objectives are:

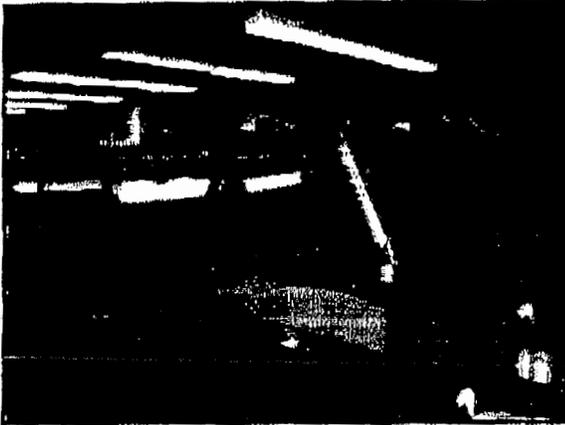
- 1) *Site-Specific Growth Experiment* Determine the ability of selected fungi to rapidly colonize natural sediment/soil from Fort Bragg;
- 2) *Contaminant Challenge* Conduct laboratory trials with a subset of these candidate species which have been demonstrated to have dioxin-like compound breakdown. The source of contaminant will be contaminated materials from the Ft Bragg site;

Comment [rjh2]: Test of up to 10kg
of soil.

Fort Bragg Dioxin Proposal

- 3) *Broadcast Media Studies* Evaluate potential substrates for broadcasting the selected mycelia into site soils/sediment for fungal species that met performance criteria from experiments 1 and 2;
- 4) *Mesocosm Experiment* Conduct a demonstration project at a mesocosm scale that documents the success of dioxin remediation. The species/strains that pass through these tiers will then be proposed for field trials on-site at Fort Bragg.

Comment [rjh3]: This is out of scope for the GP funded portion of this work.



All experiments will be conducted at the Port Gamble Environmental Laboratory, Port Gamble WA. Our environmental testing laboratory is Washington state and federally certified (WA certification number C2021; NELAC certification pending). Experiments using hazardous materials will be conducted by personnel certified in handling hazardous waste materials (HAZWOPER) in a controlled environmental chamber that isolates the contaminated soils and surrounding atmosphere from the technical staff (see photograph to left).

The individual tasks needed to accomplish these objectives are summarized below; a preliminary cost estimate and timeline follow the task summaries. It should be noted that each tiered element of the work plan would be reviewed and accepted by Georgia Pacific and DTSC prior to implementation and continuation to the next tier.

Task 1. Detailed Work Plan

NewFields will review data on the proposed remediation site including previously collected analytical data, site topography, and plans for future uses. NewFields will use this site-specific information to evaluate site conditions that might influence the growth of the potential species and contaminants of concern on-site. In addition, information on fungal species naturally occurring in the redwood forest of the northern California coast will be summarized and added to Table 1. A synopsis of the data review and a plan for conducting laboratory experiments will be included in a detailed work plan. The work plan will contain detailed information regarding the collection of field samples for use in the experiments described below, the reasons for selection of the species and strains for each phase of the experiments, the methods of chemical analyses that will be used and the replicate and compositing concept to be employed.

➤ *Deliverable:* Detailed work plan

Comment [BARK 1]: The work plan also needs to specifically and clearly state the goals and objectives for each phase of the work as well as success criteria for each phase.

Comment [BARK 2]: GP will collect samples and provide them to NewFields.

Comment [BARK 3]: The same method and lab identified in the site-specific Quality Assurance Project Plan (QAPP) as well as other QA/QC procedures in the QAPP need to be utilized. The QAPP is available on DTSC's Envirocenter website or through ARCADUR.

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Task 2. Selection of Candidate Species and Initial Fungal Grow-Out Trials

NewFields has access to extensive libraries of species and strains of fungi through its own collections and those of its research partners, Fungi Perfecti LLC and The Remediators, Inc. Additional fungal species can be added from the literature review of species known to inhabit redwood forests or isolated from materials collected at the Fort Bragg site. Often on-site collections of fungi are successful because these species are pre-adapted to site conditions. There will be more than 300 candidate species from these combined resources. Elements of this task are:

Fort Bragg Dioxin Proposal

- *Select Species Relevant to Ft Bragg Site Conditions.* Develop a list of species that occur in redwood forest areas or potentially may be present in the general vicinity of the Fort Bragg site. Compare that list to the species/strains that are included in the libraries that are available to our group. Develop a list of those species that are both present and within our libraries and compare known growth characteristics that match conditions at Fort Bragg.
 - *Select Species Successful at Contaminant Degradation.* Compare this list of species to information that is available on experiments that have been successfully used to remediated chemicals under experimental or field conditions. Include species/strains captured under these two bullets for further assessment and testing.
 - *Identify Contaminant Break-Down Strategies to Optimize Dioxin Degradation Potential.* Compare chemical structure of contaminant to natural chemicals and provide literature and library assessments of species/strains that have the potential for attacking the contaminant or natural chemicals.
 - *Produce Ft Bragg Candidate Species List.* We will examine the information on growth characteristics and known remediation potential for these strains in order to select a subsample of approximately 20 species for initial laboratory trials. These species will be subjected to performance trials in order to identify the optimum performing subset of species to be used in mesocosm trials.
- *Deliverable:* Detailed fungal species annotated list with summaries of growth characteristics, and contaminant performance history.

Task 3. Experimental Performance Trials.

Species identified in Task 2 will be evaluated by conducting a growth experiment using contaminated material from Fort Bragg. The objective will be to reduce the number of potential candidate species/strains to those that grow well in the Fort Bragg area and which are most likely to be efficient at remediation of the recalcitrant dioxin levels in soils from Fort Bragg to levels that are acceptable for residential use. Rapid growth and prolific development of enzyme exudates will be key performance criteria for experiments 1 and 2; analytical chemistry assessments will be employed for experiment 3.

Laboratory Experiment 1: Growth Trials on Site Soils

The first laboratory experiment will be a growth trial comparing different fungal species for their ability to thrive in soils collected from the Fort Bragg area that is known to contain a large amount of redwood bark. The criteria for acceptable growth include rapid expansion into the soil and the production of extracellular enzymes (visual cue that degradation is possible).

- *Growth Trials Using Site Soils.* Up to twenty fungal species will be exposed to soils from the Fort Bragg area that contains a combination of redwood bark and dioxin residues
- *Performance Criteria.* Fungal species that exhibit strong growth characteristics including rapid expansion on test material and production of extracellular enzymes will be selected for further experimentation.
- *Analytical Chemistry Analyses:* None

Comment [BRD7]: Assume this means the mill site and not just the Fort Bragg area. How much soil is needed? Is bark needed?

Comment [BRD8]: Samples will contain soil

Comment [BRD9]: How is this measured? More specific success criteria should be outlined in the work plan.

Laboratory Experiment 2: Petri Dish Trials with Contaminant Exposure

Fort Bragg Dioxin Proposal

The second laboratory experiment will involve a subset of fungal species identified during the first experiment. This experiment will examine the contaminant/fungal interaction by directional growth studies conducted in petri dishes containing fungus and an aliquot of contaminated soil containing environmentally relevant concentrations of dioxins.

- *Behavior of Fungal Species Exposed to Dioxins.* The goal of this experiment is to observe the interaction of the fungus in the presence of dioxins and the production of enzymes is observed (noted by observations of the enzyme ring and the change in pH of the agar). Changes of pH are indicative of enzyme production as the fungus changes its surroundings in order to breakdown and ingest large organic molecules as a source of food.
- *Performance Criteria.* Fungal species exhibiting directional growth and prolific production of enzymes are selected for mesocosm experiments (Experiment 3).
- *Analytical Chemistry Analyses:* None

Comment [BRD10]: How does this differ from experiment 1, which also uses contaminated soils? If just repeating with a smaller set of fungal species, seems duplicative

Comment [BRD11]: How much soil is needed? Would barb be added also?

Laboratory Experiment 3: Mesocosm Trials with Candidate Species and Contaminated Soil Samples from Site

Approximately 10 kg of soil are required for each fungal species/strain or application method; if three different fungal species are chosen for the mesocosm experiments, then 30 kg of soil will be required for testing. The actual number of fungal species chosen for the mesocosm experiments depends on the outcome of the first two studies and available funding for chemical analyses. Upon arrival at the laboratory, the soil samples will be thoroughly mixed to a homogeneous consistency and five subsamples will be collected and submitted for chemical analysis. These samples will serve as the baseline starting point of dioxins levels in the soils prior to testing.

Comment [rh12]: This is 3 times the scope of the originally contemplated "bench scale test"

Comment [BRD13]: This stage should not begin until DTSC, the City, and GP review the results of Experiments 1 and 2.

Comment [BRD14]: What conditions of light and temperature will be used? Will it mimic Fort Bragg conditions?

Comment [BRD15]: Is this the longest the test can be run?

- *Experimental Set Up.* Each fungal treatment (consists of a particular fungal species grown on a particular type of wood chip) will include five replicates, collected at test initiation, and at four, eight, and twelve weeks of testing for a total of 20 possible samples per fungal species/treatment during the 12 week test period. To start the experiment, the soils will be amended with fungal inoculum and all samples will be visually monitored over the duration of the experiment. A control sample without a fungal inoculum will also be initiated at the same time. Every four weeks during the experiment, five replicate samples are collected and archived for potential chemical analysis.
- *Analytical Chemistry.* At the termination of the experiment, all replicate samples will be collected and archived but one composited sample will be submitted for chemical analysis. This sample composite will consist of well-mixed aliquots from each replicate sample. The results of the chemical analysis will determine if contaminant concentrations are significantly reduced. If they are then the archived samples will be analyzed to demonstrate statistical confidence in the mean response. For example, if the samples collected from week 12 do not show a significant decrease of dioxin levels then no further testing is required. However, if a significant decrease of dioxins levels occurs then all the samples collected from week twelve will be analyzed to confirm the results and provide statistical confidence in the test results.
- *Use of Various Broadcast Media.* Different types of wood may be incorporated in the mesocosm studies to determine the ability of selected fungi to grown on different broadcasting substrate. It is possible that different applications such as layering soil and fungal treatment, adding burlap sacks, and the use of wash down enzymes will be compared during this phase of the experiment. For planning, we propose the following test schematic; the actual schematic will depend on the outcome of Experiments 1 and 2.

Fort Bragg Dioxin Proposal

Fungal Treatment	Alder	Black Oak	Other	Enzyme Wash
A	√	√	√	√
B	√			√

We will use a variety of different broadcast media (alder, black oak, and possibly pampas grass) and inoculation methods process to address potential field application needs.

- **Sample Compositing for Analytical Chemistry Analyses.** These experiments will use an efficient compositing scheme to analyze initial and final concentrations of dioxins and dioxin congeners in test material. The plan is to document the mean concentration of dioxin contamination in the initial samples compared to mean concentrations after remediation.

Fungal Treatment	#Composite Sample at Test Initiation	#Archival Samples at Initiation	#Archival Samples at 4 weeks	#Archival Samples at 8 weeks	#Archival Samples at 12 weeks	#Composite Sample at Test Termination
A - on alder	1	5	5	5	5	1
A - on black oak	1	5	5	5	5	1
A - other wood	1	5	5	5	5	1
A - enzyme wash	1	5	5	5	5	1
B - on alder	1	5	5	5	5	1
B - enzyme wash	1	5	5	5	5	1
# Samples	6	30	30	30	30	6

- **Number of Replicates for Statistical Rigor.** Initial estimation of the success of remediation will be based on a composite mean sample of aliquots of at least five replicates, with the remaining replicate materials archived for potential future analyses.
- **Performance Criteria.** Criteria for success at this point will be a ~50% or more reduction in the composite sample at the end of the exposure relative to the starting concentration. Candidate fungal species/strains will be screened for the ability to reduce the initial starting concentrations of dioxins. We anticipate that ~50% reduction is a reasonable expectation based on literature values for some species. Species/strains demonstrating this level of reduction can then be evaluated using the archived replicates to establish statistical confidence in the amount of reduction.
- **Bioassay on Residual Bi-Products.** Additional bioassay testing may be performed to assess toxicity of residual bi-products produced with dioxin degradation, as part of future possible work; however these bioassays are not part of this scope of work.
- **Analytical Chemistry Analyses.** Yes; sampling and analysis strategy employed for cost effective results. (See Task 4). Minimum dioxin analysis of 12 composite samples (6 initial and 6 post remediation). Archived replicate samples will be

Comment [17h16]: corrected for the amendment addition to the soil.

Comment [17h17]: Delete this for this scope of work - out of scope.

Comment [17h18]: See previous comment on use of analytical lab and QA/QC methods and QA/QC.

From: Liz Haapanen
P.O. Box 77, Mendocino, CA 95460

To: Bob Merrill, District Manager
California Coastal Commission
710 E Street, Eureka, CA 95501
(Fax) 707-445-7877

January 9, 2009
Re: Permit A-1-FTB-05053-A6

Dear Mr. Merrill,

I understand that, as North Coast District Manager of the California Coastal Commission, you are involved in the decision as to what will become of the Fort Bragg Mill Site toxic tailings. As I understand, these poisons in the soils are considered for burial in Fort Bragg, at Cypress and Main Streets.

I lived in Fort Bragg for well over a decade when the mill was in operation. I would hear the screams of the big logs after 1 p.m., and I would smell the awful odors that came from the mill at all hours of the night. While there, I grew edible gardens in the backyard. During this time, my son, then fifteen, developed schizophrenia. I never made any connections to the tailings that were sent home with the workers (my home had former mill site workers) and toxicity, or worried much about the mill, except that my clotheslines would regularly become covered with nasty soot.

After my son was institutionalized, I continued to live and work in Fort Bragg, later managing a senior housing facility, where I personally cleaned several patios that had years of soot build-up, from the mill site plumes that were emitted with frequency. I got very sick after each episode, even after using a mask.

My point is that we here on this coastline have already been so damaged by one business, that burying their poisonous toxins here is heaping insult to the injuries we have already sustained. I hope you will accept alternatives to the current plan. IF, you can find no alternative, could you at least consider a timeline that would allow the chance of mushroom bio-remediation to take effect? I have an experimental pile here at my place, and I have more hope for that as a sound alternative to cleaning, rather than just capping the waste. I would expect the California Coastal Commission to agree that this fragile coastline deserves all our best efforts in preserving its natural state.

I hope you will take my request to heart. Thank you for your time and efforts.

Signature on File

Liz Haapanen
Mendocino Coast

RECEIVED

JAN 12 2009

CALIFORNIA
COASTAL COMMISSION

From: Liz Haapanen
P.O. Box 77, Mendocino, CA 95460

To: Bob Merrill, District Manager
California Coastal Commission
710 E Street, Eureka, CA 95501
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Signature on File

Liz Haapanen
Mendocino Coast

California Coastal Commission
North Coast District Office
Bob Merrill District Manager
710 E Street
Suite 200
Eureka, CA 95501

Friday January 9th, 2009

Bob Merrill,

Regarding permit number A-1-FTB-05-053-A6, Georgia Pacific's request to cap soil contaminated with dioxins, on the headlands in Fort Bragg. I as a citizen of the Mendocino coast and a business owner in Fort Bragg, urge you to deny the permit.

I am very concerned about the safety and logic of capping toxins on the headlands, within close range of the surf, inclement weather, and in the vicinity of a proposed coastal trail. The proposal to cap contaminated soil in this location seems absurd when considering, as the CCC's own website claims the dangers of global warming will, undoubtedly impact all coastal life and will greatly erode any lands within range of the ocean. As stated on the California Coastal Commission website "Beaches and bluffs also will be exposed to greater and more frequent wave attack, due to the elevated seas as well as to a possible increase in the frequency and severity of storm waves." This statement underlines the concern that burying toxins near the coast is an irresponsible and dangerous venture.

Please consider the safety of coastal residents and visitors in your decision regarding the Georgia Pacific application, which to residents of the Mendocino Coast appears to be a "quick fix" for a large corporation, but has serious consequences for those of us that live and operate businesses in Fort Bragg.

RECEIVED

JAN 12 2009

CALIFORNIA
COASTAL COMMISSION

Thank you,
Erin Severi
P.O.Box 455
Little River, Ca 95456

Bob Merrill

From: Gale [gbrealty@mcn.org]
 Sent: Friday, January 09, 2009 10:50 AM
 To: Bob Merrill
 Cc: 'Gale Beauchamp'
 Subject: INFORMATION IN SUPPORT OF COASTAL COMMISSION21.doc

This is our message in favor of Coastal Commission Permit A-1 FTB-05-053-A6 as input for your February meeting.
 Thank you.

**INFORMATION IN SUPPORT OF COASTAL COMMISSION
 PERMIT A-1 FTB-05-053-A6**

Bob Merrill, District Manager
bmerrill@coastal.ca.gov

California Coastal Commission
 North Coast District Office
 710 E Street, Suite 200
 Eureka, CA 95501

Key reasons we support the Coastal Commission permit:

- Since the mill closed in 2002, Georgia-Pacific has been working with the appropriate agencies on full investigation and cleanup of the mill site. DTSC has reviewed every action taken on the site and will continue to do so. They are experts in these matters and only approve those actions that will protect and improve the environment. After public review and public meetings, DTSC and the City approved the RAP for cleanup of the Coastal Trail and Parkland (OU-A), including onsite management of soils containing low levels of dioxins in a containment cell system.
- The containment system includes a durable 40-mil PVC liner that will form an impermeable barrier to isolate the soil from the environment and all contact with people or wildlife (compare this to a grocery sack, generally 1-mil thick, that is being banned in many places because it is said to "never break down in a landfill"). Additional liners and layers of topsoil and vegetation will be placed on top of the cell to prevent rainwater from entering and to guard against burrowing animals.
- Groundwater around the containment cell will be monitored to make sure contamination doesn't leave the cell. Indeed, dioxins bind so tightly to soil that they would not likely impact groundwater even without the added protection of the liners and other precautions built into the cell's design. Also, the cell is situated more than 1,000 feet from the coastline in an area with at least five feet between the bottom of the cell and the water table.
- The use of the containment cell makes sense. The presence of the cell will not prevent future land use around or even on top of the 1.5-acre footprint. Alternatives to onsite management include bioremediation, but such treatment for dioxins is still theoretical and not a proven technology, particularly on a large scale or in the coastal weather conditions of Fort Bragg. Georgia-Pacific has shown its willingness to use bioremediation where feasible, and is currently using bioremediation to clean tons of petroleum-contaminated soil at the mill site. In addition, the company is working with DTSC and the City to look into research on other forms of bioremediation that may be useful if proven effective and compliant with regulations. However, until such time as bioremediation or some other form of treatment is developed, putting the soil in the cell on site is much more efficient and safe than sending truckloads of soil with low levels of dioxin over hundreds of miles of local roads.
- Some concerns regarding mill site beaches and the ocean were raised in the course of developing the OU-A RAP. Sampling was conducted in the near and off shore areas and the results indicated that our beaches and

the ocean are safe for public recreation and the sea creatures that live there. The OU-A RAP, once implemented, will further assure the protection of these areas and preserve these important resources.

- DTSC and the City have already approved the OU-A RAP, and implementing it is a very important step toward opening our coastline to the community and the entire 415-acre mill site to businesses and visitors that can in turn bring much-needed redevelopment and revenue to our area.

- We have lived and worked in Fort Bragg for 39 years and trust the DTSC and others to do their job and oversee the safe and effective cleanup of the mill site.
- We support approval of the Coastal Development Permit so the cleanup of OU-A can begin immediately.

Sincerely,

Daryl and Gale Beauchamp
Owners of Cypress Self Storage and
Gale Beauchamp Realty
345 Cypress Street
Fort Bragg, CA 95437

Bob Merrill

From: Sue Zahniser [SueZahniser@SeaCottage.com]
Sent: Friday, January 09, 2009 10:42 AM
To: Bob Merrill
Subject: [Possible Spam] FW: [Reinfo] GP letter of support needed.
Importance: Low

Dear Bob;

I support the cleanup of the coastal trail and the extended areas as outlined in the above attachment.

Thanks,
Sue Zahniser

Sue Zahniser

Office: (707) 937-0423

or, (800) 707-6423

Home office: (707) 937-1809

Fax: (707) 937-2308

suezahniser@seacottage.com

10481 Lansing Street, PO Box 762

Mendocino CA 95460

www.seacottage.com

SUPPORT OF COASTAL COMMISSION
PERMIT A-1 FTB-05-053-A6

Send e-mails to:
Bob Merrill, District Manager
bmerrill@coastal.ca.gov

Address letters to:
Bob Merrill, District Manager
California Coastal Commission
North Coast District Office
710 E Street, Suite 200
Eureka, CA 95501

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via email if possible. If sent via
first-class mail, they should be
postmarked no later than Monday,
January 12, 2009, to be included in
the Commission Review Package.
Letters not included in the
Commission Review Package can
be received until January 31. ¶

The Coastal Commission will meet the first week in February to approve or deny a permit request to allow cleanup of the Fort Bragg Mill Site's Operable Unit A (OU-A, coastal trail and parkland). Cleanup would take place in 2009 so that the City can begin development of an extension of the Coastal Trail and other recreational resources along the three miles of coastline. The City will own the Coastal Trail (OU-A) land after cleanup is complete.

The cleanup would be conducted under the OU-A Remedial Action Plan (RAP), which has already been approved by the DTSC and the City of Fort Bragg, including review and input by the Regional Water Quality Control Board and the public. During the cleanup, soils containing low levels of dioxins will be dug up and placed in a sealed and monitored containment cell (about 6 feet deep and 1.5 acre in size) in another location on the mill site.

Key reasons to support the Coastal Commission permit:

- Since the mill closed in 2002, Georgia-Pacific has been working with the appropriate agencies on full investigation and cleanup of the mill site. DTSC has reviewed every action taken on the site and will continue to do so. They are experts in these matters and only approve those actions that will protect and improve the environment. After public review and public meetings, DTSC and the City approved the RAP for cleanup of the Coastal Trail and Parkland (OU-A), including onsite management of soils containing low levels of dioxins in a containment cell system.
- The containment system includes a durable 40-mil PVC liner that will form an impermeable barrier to isolate the soil from the environment and all contact with people or wildlife (compare this to a grocery sack, generally 1-mil thick, that is being banned in many places because it is said to "never break down in a landfill"). Additional liners and layers of topsoil and vegetation will be placed on top of the cell to prevent rainwater from entering and to guard against burrowing animals.
- Groundwater around the containment cell will be monitored to make sure contamination doesn't leave the cell. Indeed, dioxins bind so tightly to soil that they would not likely impact groundwater even without the added protection of the liners and other precautions built into the cell's design. Also, the cell is situated more than 1,000 feet from the coastline in an area with at least five feet between the bottom of the cell and the water table.
- The use of the containment cell makes sense. The presence of the cell will not prevent future land use around or even on top of the 1.5-acre footprint. Alternatives to onsite management include bioremediation, but such treatment for dioxins is still theoretical and not a proven technology, particularly on a large scale or in the coastal weather conditions of Fort Bragg. Georgia-Pacific has shown its willingness to use bioremediation where feasible, and is currently using bioremediation to clean tons of petroleum-contaminated soil at the mill site. In addition, the company is working with DTSC and the City to look into research on other forms of bioremediation that may be useful if proven effective and compliant with regulations. However, until such time as bioremediation or some other form of treatment is developed, putting the soil in the cell on site is much more efficient and safe than sending truckloads of soil with low levels of dioxin over hundreds of miles of local roads.
- Some concerns regarding mill site beaches and the ocean were raised in the course of developing the OU-A RAP. Sampling was conducted in the near and off shore areas and the results indicated that our beaches and the ocean are safe for public recreation and the sea creatures that live there. The OU-A RAP, once implemented, will further assure the protection of these areas and preserve these important resources.

- DTSC and the City have already approved the OU-A RAP, and implementing it is a very important step toward opening our coastline to the community and the entire 415-acre mill site to businesses and visitors that can in turn bring much-needed redevelopment and revenue to our area.
- I have lived and worked in Fort Bragg for almost 7 years and trust the DTSC and others to do their job and oversee the safe and effective cleanup of the mill site.
- I support approval of the Coastal Development Permit so the cleanup of OU-A can begin immediately.

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California Coastal Commission
North Coast District Office
Bob Merrill, District Manager
710 E Street , Suite 200
Eureka, CA 95501

P.O. Box 395
Navarro, CA 95463
January 10, 2009

RE: Permit A-1-FTB-05-053-A6

Dear Mr. Merrill and Esteemed Coastal Commissioners:

Georgia - Pacific's proposal to cap the dioxins contaminated soil from the proposed coastal trail area of the former Fort Bragg Mill Site is unacceptable to many of us in the local community.

The encroachment of the sea along the shoreline makes it only a matter of time before the proposed site is eroded into the ocean - and who can say how soon, given the unpredictable effects of global climate change? Just in the last couple of decades areas we used to drive safely along the headlands of what is now Pomo Bluff City Park have disappeared. At this rate, it is conceivable that the proposed site could be gone within the lifetime of those living today - never mind accelerating rates.

As explained in some of the public hearings, after completing the project, this site would legally be able to be built upon, including housing above the ground floor businesses. In theory, gardens would be legal. It is impossible to assure that the liner will outlast the potential toxicity of the dioxins. The potential harm from these eventualities seems obvious to many of us.

We ask that the California Coastal Commission insist upon the Adequate Exploration of Alternatives by supporting the Bench Test for Myco-remediation of the dioxins. To cut off this encouraging research just as it's on the brink of achieving positive results is to waste a precious opportunity. Please allow Science working with Nature a chance to prove itself.

RECEIVED

JAN 12 2009

CALIFORNIA
COASTAL COMMISSION

Respectfully, 



Signature on File



Patricia Lipmanson

Attached Documents:

Background Information

NewFields Laboratory Brochure

NewFields preliminary Bench Test Proposal

Maps with proposed consolidation call

New York Times and San Francisco Chronicle Articles

Background Information

January 2008: Paul Stamets toured the GP mill site with Bridgette DeShields, Linda Ruffing, and community members Antonio Wutke and Thais Mazur.

May 2008: The community recommends that GP speak with Mr. Stamets about the possibility of mycellium being used to clean up the dioxin-furan contaminated soil on the GP mill site.

In a Fort Bragg City Council meeting the idea of mycoremediation is well received by the city council members and the public. GP commits to paying for a myco-remediation bench test.

June 2008: Three community members attend a workshop with Paul Stamets on mycoremediation at FungiPerfecti.

June 2008: Conference/call with DTSC, Chip Hillardes, GP, City of Fort Bragg City Manager Linda Ruffing, Bridgett Deshields (title?), Glenn Young (environmental consultant for the city of Fort Bragg), Community members Antonio Wutke, Environmental Designer, Debra Scott, educator and Thais Mazur, North Coast Action.

September 2008: Second conference/call to develop the Bench Test proposal for the presently ongoing revision from NewFields Laboratory.

January 10, 2009

California Coastal Commission
North Coast Division
John Merrill, District Manager
710 E Street, Suite 200
EUREKA, CA 95501

REF: A1-FTB-05-053-A6

As a lifelong resident of and property owner in Mendocino County I am adamantly opposed to the proposed "clean-up" plans for the Georgia-Pacific mill site in Ft. Bragg.

There has been no focus on the amount of contamination that will be released into the air if the toxic soil is scraped to be dumped and capped on site or elsewhere. There is no information as to the security of capped storage sites beyond 30 years. No consideration is being given to the geological instability of the region. Nor is the potential for rising sea levels or a tsunami type scenario being addressed. There should be no dumping and no capping of toxic soil on this site until every alternative is fully explored.

The potential for bio/myco remediation should be funded fully to allow studies to explore these alternatives as a first priority.

Sincerely,

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JAN 14 2009

CALIFORNIA
COASTAL COMMISSION

Signature on File

Signature on File

Linda Marie Abranya
711-A LAKE MENDOCINO DR
UKiah, CA 95482

176 of 210

Bob Merrill

From: Susie Gibson [suzieg@mcn.org]
Sent: Saturday, January 10, 2009 4:38 PM
To: Bob Merrill
Subject: INFORMATION IN SUPPORT OF COASTAL COMMISSION

**INFORMATION IN SUPPORT OF COASTAL COMMISSION
PERMIT A-1 FTB-05-053-A6**

North Coast District Office
710 E Street, Suite 200
Eureka, CA 95501

Bob Merrill

DTSC and the City have already approved the OU-A RAP, and implementing it is a very important step toward opening our coastline to the community and the entire 415-acre mill site to businesses and visitors that can in turn bring much-needed redevelopment and revenue to our area. I have lived and worked in Fort Bragg for 46 years and trust the DTSC and others to do their job and oversee the safe and effective cleanup of the mill site. I support approval of the Coastal Development Permit so the cleanup of OU-A can begin immediately.

Thank you!

Suzie Gibson
326 Park Street
Fort Bragg Ca 95437
Phone (707) 964-6818

Bob Merrill

From: Barbara Clark [bclark@mcn.org]
Sent: Saturday, January 10, 2009 2:57 PM
To: Bob Merrill
Subject: Fort Bragg Mill Site's Operable Unit A (OU-A. coastal trail and parkland).

Bob Merrill
District Manager
California Coastal Commission
North Coast District Office
710 E Street, Suite 200
Eureka, Ca. 95501

Re: Fort Bragg Mill Site Cleanup

Dear Mr. Merrill:

Please allow the cleanup to be conducted under the OU-A Remedial Action Plan (RAP), which has already been approved by the DTSC and the City of Fort Bragg, including review and input by the Regional Water Quality Control Board and the public.

It is time to move forward with this project and believe that the best solution for all has been brought forth.

I have lived and worked in Fort Bragg for 34 years and I trust the DTSC, City of Fort Bragg and the Regional Waste Quality Control Board to do their job. They will oversee the safe and effective cleanup of the mill site.

I support Approval of the Coastal Development Permit so the cleanup of OU-A can begin immediately.

Thank you for your attention to this matter.

Respectfully

Barbara Clark

Barbara Clark
Century 21 Fort Bragg Realty
809 N. Main St.
Fort Bragg, CA 95437

(707) 961-1111 (Voice)
(707) 964-3402 (Fax)
bclark@mcn.org

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JAN 14 2009

CALIFORNIA
COASTAL COMMISSION

INFORMATION IN SUPPORT OF COASTAL COMMISSION
PERMIT A-1 FTB-05-053-A6

Send e-mails to:

Bob Merrill, District Manager
bmerrill@coastal.ca.gov

Address letters to:

Bob Merrill, District Manager
California Coastal Commission
North Coast District Office
710 E Street, Suite 200
Eureka, CA 95501

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The Coastal Commission will meet the first week in February to approve or deny a permit request to allow cleanup of the Fort Bragg Mill Site's Operable Unit A (OU-A, coastal trail and parkland). Cleanup would take place in 2009 so that the City can begin development of an extension of the Coastal Trail and other recreational resources along the three miles of coastline. The City will own the Coastal Trail (OU-A) land after cleanup is complete.

The cleanup would be conducted under the OU-A Remedial Action Plan (RAP), which has already been approved by the DTSC and the City of Fort Bragg, including review and input by the Regional Water Quality Control Board and the public. During the cleanup, soils containing low levels of dioxins will be dug up and placed in a sealed and monitored containment cell (about 6 feet deep and 1.5 acre in size) in another location on the mill site.

Key reasons to support the Coastal Commission permit:

- Since the mill closed in 2002, Georgia-Pacific has been working with the appropriate agencies on full investigation and cleanup of the mill site. DTSC has reviewed every action taken on the site and will continue to do so. They are experts in these matters and only approve those actions that will protect and improve the environment. After public review and public meetings, DTSC and the City approved the RAP for cleanup of the Coastal Trail and Parkland (OU-A), including onsite management of soils containing low levels of dioxins in a containment cell system.
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The OU-A RAP, once implemented, will further assure the protection of these areas and preserve these important resources.

- DTSC and the City have already approved the OU-A RAP, and implementing it is a very important step toward opening our coastline to the community and the entire 415-acre mill site to businesses and visitors that can in turn bring much-needed redevelopment and revenue to our area.
- I have lived and worked in Fort Bragg for **45** years and trust the DTSC and others to do their job and oversee the safe and effective cleanup of the mill site.
- I support approval of the Coastal Development Permit so the cleanup of OU-A can begin immediately.

1/12/09

Ⓒ SIGNATURES ON FILE

527 West St
Fort Bragg CA 95437
(707) 964-5208

Norman de Vall & Associates
Land Use Planning Consultants
P.O. Box 3
5975 South Highway One
Elk, California 95432
(707) 877-3551 877-1861 357-5555
ndevall@mcn.org

January 12, 2009

California Coastal Commission
North Coast District Office
Attn.: Bob Merrill
710 E Street, Suite 200
Eureka, California 95501
(707) 445-7833 445-7877

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JAN 14 2009

CALIFORNIA
COASTAL COMMISSION

re: A-1-FTB-05-053-A6
Georgia Pacific

Dear Mr. Merrill,

I am writing in opposition to the proposed excavation and covering in a consolidation cell of approximately 13,000 yards of dioxin impacted soil.

In my opinion the site should be considered relatively high risk due to earth quake fault lines, the short life span of the cell liner and the prospect of leachate being able to enter the Pacific Ocean undetected.

The Mendocino Coast has a number of "legal" sites which over time have significantly impacted the coastal environment.

The United States Air Force Station at Point Arena was so polluted that the site today is considered unusable. The "disposal" of fly ash from the George Pacific power plant on Bald Hill northeast of Fort Bragg has residents concerned of its leaching into Pudding Creek and Virgin Creek. The Mendocino County Land Fill at Caspar so polluted the aquifer that the County had to purchase private property when the water was no longer potable. The LP, now MRC, mill site on Gibney Lane has so polluted the aquifer that down stream residents are provided with bottled drinking water.

Each of these sites were given government approval for their operation.

Supporters of the GP application argue that transport from the Coast to an approved disposal site is an unreasonable risk and that we should "not dispose of our polluted soils in someone else's community". Nor should we place these soils where there is any possibility that can might pollute the ocean environment.

I, and many others, urge denial of the application.

Sincerely,

Signature on File

 Norman L. de Vall



Bob Merrill

From: Claraekstrom@aol.com
Sent: Monday, January 12, 2009 5:11 PM
To: Bob Merrill
Subject: Re:Support of Coastal Permit

January 9, 2009

To: Bob Merrill, District Manager
California Coast
Pacific North Coast District Office
710 E Street, Suite 200
Eureka, CA 95501

Dear Sir,

The purpose of this letter is to urge the Coastal Commission to immediately approve containment cleanup of the Georgia Pacific Property in Fort Bragg, California. It is essential to the economic viability of this community to restore this ground to production. The closure of the Georgia Pacific Mill had a profound impact on the economic health of this community, and any further delay serves only to worsen this impact. The containment process appears reasonable and viable, and seems to be a good alternative to much more expensive and complicated types of treatment. There are no significant concerns regarding the use of this property that make common sense. Please approve this cleanup and make it a priority on your schedule. Thanking you in advance for your cooperation.

Sincerely,

Paul M. Lagomarsino, MD

(I have just received this dictation and am forwarding this letter to you from work. I would have mailed it but missed the deadline. You may contact my office to confirm. 707-961-4550)

A Good Credit Score is 700 or Above. [See yours in just 2 easy steps!](#)

**INFORMATION IN SUPPORT OF COASTAL COMMISSION
PERMIT A-1 FTB-05-053-A6**

Send e-mails to:

Bob Merrill, District Manager
bmerrill@coastal.ca.gov

Address letters to:

Bob Merrill, District Manager
California Coastal Commission
North Coast District Office
710 E Street, Suite 200
Eureka, CA 95501

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The Coastal Commission will meet the first week in February to approve or deny a permit request to allow cleanup of the Fort Bragg Mill Site's Operable Unit A (OU-A, coastal trail and parkland). Cleanup would take place in 2009 so that the City can begin development of an extension of the Coastal Trail and other recreational resources along the three miles of coastline. The City will own the Coastal Trail (OU-A) land after cleanup is complete.

The cleanup would be conducted under the OU-A Remedial Action Plan (RAP), which has already been approved by the DTSC and the City of Fort Bragg, including review and input by the Regional Water Quality Control Board and the public. During the cleanup, soils containing low levels of dioxins will be dug up and placed in a sealed and monitored containment cell (about 6 feet deep and 1.5 acre in size) in another location on the mill site.

Key reasons to support the Coastal Commission permit:

- Since the mill closed in 2002, Georgia-Pacific has been working with the appropriate agencies on full investigation and cleanup of the mill site. DTSC has reviewed every action taken on the site and will continue to do so. They are experts in these matters and only approve those actions that will protect and improve the environment. After public review and public meetings, DTSC and the City approved the RAP for cleanup of the Coastal Trail and Parkland (OU-A), including onsite management of soils containing low levels of dioxins in a containment cell system.
- The containment system includes a durable 40-mil PVC liner that will form an impermeable barrier to isolate the soil from the environment and all contact with people or wildlife (compare this to a grocery sack, generally 1-mil thick, that is being banned in many places because it is said to "never break down in a landfill"). Additional liners and layers of topsoil and vegetation will be placed on top of the cell to prevent rainwater from entering and to guard against burrowing animals.
- Groundwater around the containment cell will be monitored to make sure contamination doesn't leave the cell. Indeed, dioxins bind so tightly to soil that they would not likely impact groundwater even without the added protection of the liners and other precautions built into the cell's design. Also, the cell is situated more than 1,000 feet from the coastline in an area with at least five feet between the bottom of the cell and the water table.
- The use of the containment cell makes sense. The presence of the cell will not prevent future land use around or even on top of the 1.5-acre footprint. Alternatives to onsite management include bioremediation, but such treatment for dioxins is still theoretical and not a proven technology, particularly on a large scale or in the coastal weather conditions of Fort Bragg. Georgia-Pacific has shown its willingness to use bioremediation where feasible, and is currently using bioremediation to clean tons of petroleum-contaminated soil at the mill site. In addition, the company is working with DTSC and the City to look into research on other forms of bioremediation that may be useful if proven effective and compliant with regulations. However, until such time as bioremediation or some other form of treatment is developed, putting the soil in the cell on site is much more efficient and safe than sending truckloads of soil with low levels of dioxin over hundreds of miles of local roads.
- Some concerns regarding mill site beaches and the ocean were raised in the course of developing the OU-A RAP. Sampling was conducted in the near and off shore areas and the results indicated that our beaches and the ocean are safe for public recreation and the sea creatures that live there.

The OU-A RAP, once implemented, will further assure the protection of these areas and preserve these important resources.

- DTSC and the City have already approved the OU-A RAP, and implementing it is a very important step toward opening our coastline to the community and the entire 415-acre mill site to businesses and visitors that can in turn bring much-needed redevelopment and revenue to our area.
- I have lived and worked in Fort Bragg for **45** years and trust the DTSC and others to do their job and oversee the safe and effective cleanup of the mill site.
- I support approval of the Coastal Development Permit so the cleanup of OU-A can begin immediately.

✓ SIGNATURES ON FILE)

1/12/09

527 W 1st St

Fort Bragg CA 95437

(707) 964-5208

INFORMATION IN SUPPORT OF COASTAL COMMISSION
PERMIT A-1 FTB-05-053-A6

Send e-mails to:
Bob Merrill, District Manager
bmerrill@coastal.ca.gov

Address letters to:
Bob Merrill, District Manager
California Coastal Commission
North Coast District Office
710 E Street, Suite 200
Eureka, CA 95501

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- I have lived and worked in Fort Bragg for 57 years and trust the DTSC and others to do their job and oversee the safe and effective cleanup of the mill site.
- I support approval of the Coastal Development Permit so the cleanup of OU-A can begin immediately.

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Sincerely,
Bob Borcich
401 N. Main St.
Fort Bragg, Ca. 95402



SIERRA CLUB

FOUNDED 1892

Sierra Club Mendocino Group
PO Box 522
Mendocino, CA 95460

California Coastal Commission

North Coast District Office

Bob Merrill, District Manager

710 E Street, Suite 200

Eureka, CA 95501

January 14, 2009

RECEIVED

JAN 14 2009

CALIFORNIA
COASTAL COMMISSION

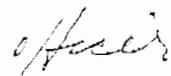
Commissioners,

- Sierra Club. Mendocino Group has reservations about the proposed capping of 13,000 cubic yards of dioxin contaminated soil on an acre and a half of land on the former GP Mill Site in Fort Bragg (Permit No. A1-FTB-05-53-A6). The contaminated material is to be managed subsurface in a consolidated cell, and there is additional acreage reserved for possible other future capping. We fear it sets a dangerous precedent. The proposed amendment essentially asks that a toxic dump be sanctioned in the coastal zone, in an area west of Highway 1, adjacent to the city of Fort Bragg. It is hardly a Coastal Dependent Activity.
- The local people don't want this. They want a full site evaluation to occur before these kinds of actions take place. They want an investigation of the intertidal and offshore areas. They want some reassurance concerning the safety of these areas for fishing and recreating. They want to be able to talk to visitors with some confidence. They don't want a hurry up, piecemeal investigation and or remediation. This is not the stuff of an amendment. This is properly the subject of a whole new CDP. This is a big deal. Please don't be too quick about this decision.
- We think there has been insufficient evaluation of the hydrology of the area in which this cell site and others are to be situated. The information is incomplete, research is lacking. The impact of the liner, or liners, on the water dynamics could be huge.

- And certainly, there must be provisions that require this proposed consolidated cell treatment be reevaluated regularly in the light of new remediation technologies and treatments. Georgia Pacific has publicly stated it would provide funds and time for a bench test of mycological remediation techniques proposed by Paul Stamets. Please insist they live up to this promise to the community.

Thank you for your consideration,

Signature on File



Mary Walsh, Sierra Club, Mendocino Group

Bob Merrill
California Coastal Commission
North Coast District
710 E Street, Suite 200
Eureka, Ca. 95501

Sent Via Email bmerrill@coastal.ca.gov

January 19, 2009

Re: Support of Permit A-1 FTB-05-053-A6

The Coastal Commission will be meeting shortly to consider approval of the permit to allow clean-up of Fort Bragg's Mill Site Operable Unit A. The clean up would be done under the OU-A Remedial Action Plan (RAP) which has already been approved by DTSC and the City of Fort Bragg including review and input from the Regional Water Quality Control Board and the public.

Since the mill closed in 2002, Georgia-Pacific has been working with the appropriate agencies on full investigation and cleanup of the mill site. DTSC has reviewed every action taken on the site and will continue to do so. They are experts in these matters and only approve those actions that will protect and improve the environment. After public review and public meetings, DTSC and the City approved the RAP for cleanup of the Coastal Trail and Parkland (OU-A), including onsite management of soils containing low levels of dioxins in a containment cell system.

Groundwater around the containment cell will be monitored to make sure contamination doesn't leave the cell. Indeed, dioxins bind so tightly to soil that they would not likely impact groundwater even without the added protection of the liners and other precautions built into the cell's design. Also, the cell is situated more than 1,000 feet from the coastline in an area with at least five feet between the bottom of the cell and the water table.

The use of the containment cell makes sense. The presence of the cell will not prevent future land use around or even on top of the 1.5-acre footprint. Alternatives to onsite management include bioremediation, but such treatment for dioxins is still theoretical and not a proven technology, particularly on a large scale or in the coastal weather conditions of Fort Bragg. Georgia-Pacific has shown its willingness to use bioremediation where feasible, and is currently using bioremediation to clean tons of petroleum-contaminated soil at the mill site. In addition, the company is working with DTSC and the City to look into research on other forms of bioremediation that may be useful if proven effective and compliant with regulations. However, until such time as bioremediation or some other form of treatment is developed, putting the soil in the cell on site is much more efficient and safe than sending truckloads of soil with low levels of dioxin over hundreds of miles of local roads.

DTSC and the City have already approved the OU-A RAP, and implementing it is a very important step toward opening our coastline to the community and the entire 415-acre mill site to businesses and visitors that can in turn bring much-needed redevelopment and revenue to our area.

I have spent countless hours dealing with this issue and fully support the Remedial Action Plan. I am a life long resident of Fort Bragg, having dealt with contamination issues in the past, I know the cost of time delays and the issues that stand in the way of progress. I support approval of the Coastal Development Permit so the cleanup of OU-A can begin immediately.

Sincerely,

Michael Anderson

Ireland
PHOTOGRAPHS BY TOM KELLY
Classie Bawn, County Sligo

NORTH BAY CA 95501



RE: PERMIT A-1-FTB-05-053-12
GEORGIA PACIFIC CORPORATION

RECEIVED

JAN 12 2009

Dear Mr. Merrill / Coastal Commission,
Please Consider issuing G.Pacific
Corp. a ~~TEMPORARY~~ permit to
encapsulate contaminated soil
at their Fort Bragg site while
mandating a set time for GP to come
up with a better remediation plan.

Permanent capping so close to
eroding cliffs and over sea causes
simply does not make sense.

I thank you for considering this.
Sincerely,
T

POSTAGE WILL BE PAID BY ADDRESSEE
BON 0009 ROBERT CA 94927

CALIFORNIA
COASTAL COMMISSION

California Coastal Commission
North Coast District Office

Bob Merrill, District
Manager

710 E Street, Suite 200

Eureka, California 95501

Signature on File

FT BRAGG, CA

© Tom Kelly
888-888-8888

Laura Pope Designs

Mr. Bob Merrill
North Coast District Office
California Coastal Commission
710 E. Street Suite 200
Ukiah, CA 95501

RECEIVED

REF# AIFTB05053A6

JAN 12 2009

CALIFORNIA
COASTAL COMMISSION

Good morning Bob,

I am writing about the toxic situation at the Mill site. I am a home owner and live in Fort Bragg. I look forward to the day my family will be able to walk along the headlands that are being discussed re: toxic waste in the ground.

I urge you to vote to move this approximately 13,000 yards of dioxin laden material off site. I am definitely not in favor of burying it in a bladder on the mill site. And, I also urge you to support any possibilities of bioremediation, which if successful, would be an excellent example to other cities worldwide that have similar problems.

Let's be leaders in new possibilities for what appears to be a very challenging future.

Thanks for your consideration of this very important matter.

Best regards,

 Signature on File 

16600 Franklin Road, Fort Bragg, CA 707.964.457 laura-pope.com

Village Solar and Electric

Eric Stromberger, Contracting and Consulting
License #797923
P O Box 966, Mendocino, CA 95460
707-964-3035 voice, 964-5394 fax

Mr. Bob Merrill
North Coast District Office
California Coastal Commission
710 E. Street Suite 200
Ukiah, CA 95501

RECEIVED

JAN 12 2009

CALIFORNIA
COASTAL COMMISSION

REF# AIFTB05053A6

Good morning Bob,

I am writing about the toxic situation at the Mill site. I am a home owner and neighbor to the Mill site. I live on the headlands about less than a mile to the south.

I urge you to vote to move this approximately 13,000 yards of dioxin laden material off site. I am definitely not in favor of burying it in a bladder on the mill site. And, I also urge you to support any possibilities of bioremediation, which if successful, would be an excellent example to other cities worldwide that have similar problems.

Let's be leaders in new possibilities for what appears to be a very challenging future.

Thanks for your consideration of this very important matter.

Best regards,




Signature on File

Eric Stromberger
33400 Pacific Way
Fort Bragg, CA 95437

North Coast District Office
Bob Merrill, District Manager
710 E Street, Suite 200
Eureka, CA 95501

RECEIVED

JAN 09 2009

CALIFORNIA
COASTAL COMMISSION

This letter is requesting that the California Coastal Commissioners deny permit A-1-FTB-05-053-A6 to the applicants Georgia-Pacific Corporation.

The community is very concerned about the capping of 13,000 cubic yards of contaminated soil on 1.5 acres of land on the Georgia Pacific Corporation property in the heart of Fort Bragg and located in the Coastal Zone. The storing of toxic contaminated soil under the ground in the Coastal Zone is not a Coastal Dependent Activity as defined in the California Coastal Act.

Permitting a major corporation to bury toxic soil on the coast, contained or not contained, will leave a dangerous legacy for generations to come.

CONCERNS:

- Global Warming - Rising Sea Levels

The site for the consolidation cell has been chosen for a few hundred yards from the coastal bluffs buried 6 feet beneath the soil surface. There is great concern about rising sea levels. In Fort Bragg, we receive Tsunami warnings on a regular basis. Hence, capping toxic soil a few hundred yards from the coastal bluffs is NOT a good idea.

- No Capping in the Heart of Fort Bragg

Capping toxic soil in the heart of a city center is a bad idea. It is bad for tourism, it is bad for public health and it is bad for the environment. It will create a stigma in our town that is very dependent on tourist dollars. We don't want a toxic waste dump in our town!

- No Safe Levels of Dioxin According to EPA and Other Agencies

Dioxins and furans are some of the most toxic chemicals known to science. A draft report released for public comment in September 1994 by the US Environmental Protection Agency clearly describes dioxin as a serious public health threat. The public health impact of dioxin may rival the impact that DDT had on public health in the 1960's. According to the EPA report, not only does there appear to be no "safe" level of exposure to dioxin, but levels of dioxin and dioxin-like chemicals have been found in the general US population that are "at or near levels associated with adverse health effects."

The International Agency for Research on Cancer (IARC) - part of the World Health Organization -- published their research into dioxins and furans and announced on February 14, 1997, that the most potent dioxin, 2,3,7,8-TCDD, is now considered a Group 1 carcinogen, meaning a "known human carcinogen." Also, in January 2001, the U.S. National Toxicology Program upgraded 2,3,7,8-TCDD from "Reasonably Anticipated to be a Human Carcinogen" to "Known to be a Human Carcinogen." See their reports on dioxins and furans from their most recent *11th Report on Carcinogens*. Finally, a 2003 re-analysis of the cancer risk from dioxin reaffirmed that there is no known "safe dose" or "threshold" below which dioxin will not cause cancer.

A July 2002 study shows dioxin to be related to increased incidence of breast cancer.

- Capping will set a Precedent for more capping in the future on the mill site

There is more than just the 13,000 cy of dioxin contaminated soil on the mill site found to date. Capping will set a precedent for capping other dioxin contaminated soil in the future. GP has set aside another 9 acres for the purposes of capping. Don't let this 1.5 acre capping set a precedent for the future of the coast or our town!

- What was burned in the Power House on the millsite was NOT just redwood bark but redwood bark sprayed with the fungicide Pentachlorophenol that when burned at a low temperature creates large molecule dioxin. Hence, the fly ash that has contaminated the mill site soil is not, as Chip Hillardes said at the December 12, 2008 California Coastal

Commission hearing, "like fly ash you find in your fire place." In addition, there have been numerous reports by ex-employees of GP of toxic waste materials being burned in the Power House, including the use of contaminated diesel oil sprayed on the bark to help it burn.

- Exploration of Adequate Alternatives Two proposals have been submitted by NewFields Laboratory to bench test Mycoremediation to Georgia Pacific Corporation and the final revision will be submitted in early February 2009.

Bench Test negotiations are currently Underway- Myco-remediation Bench Test negotiations are currently underway with NewFields Laboratory and GP. Dr. Jack Word, who will be overseeing the bench test, is currently working on the third and final revision of a proposal for Bench Testing the remediation of 10kg of contaminated soil from the GP millsite. Stamets and Dr. Word are proposing the use of 20 possible samples per fungal species/treatment during a 12 week test period. Give it a chance to happen. The fungal samples will be selected from Paul Stamet's library of over 300 fungal species that have been identified to have bioremediation properties.

- Temporary Capping ONLY. We ask that the California Coastal Commission mandate that Georgia Pacific look for an alternative to remediate the dioxin-furan soil and under a deemed timeline, the capped contaminated soil would need to be remediated on site with an alternative solution or be removed.

Respectfully,

 Signature on File 1

HORICON SCHOOL DISTRICT



35555 Annapolis Road
Annapolis, CA 95412-9713
(707) 886-5322 Office
(707) 886-5422 Fax

RECEIVED

JAN 08 2009

CALIFORNIA
COASTAL COMMISSION

Dear Mr. Meryl,

We are the 7th and 8th grade students at Horicon School, and this morning our teacher informed us about the chemicals at the Mill Site in Fort Bragg. We are concerned about the safety of the community in Ft. Bragg due to the quality of the water and the earth. We know that pollution can kill living organisms including fish, amphibians and mammals. What's more people in Ft. Bragg have to live there and drink the water! Some of us think that burying the soil in the non-permeable liner is a good idea, others think that trucking the soil far away to an existing waste site is a better idea. Some of us think that bioremediation is the best solution. We hope that you will consider all of the options and make the right decision for the community of Ft. Bragg.

Sincerely,
7th and 8th Graders at Horicon

Shou

Manee

Patricia A.

Anna Nat

SIGNATURES ON FILE

SIGNATURES ON FILE

SIGNATURES ON FILE

V.

Y...

Ma...

Grace Wamock

To: The California Coastal Commission
Re: A1 FTBO5053AG

As a frequent visitor to Fort Bragg and coastal areas of Mendocino, I urge the Commission not to permit a cap on toxic soils in this fragile, unstable coastal zone, particularly in light of rising sea levels and the improbability of containing the toxins for future generations.

There has not been adequate testing of the hundreds of species of fungi that might detoxify the sites safely and Georgia Pacific is not honoring their responsibility to fully fund the needed research. Make a decision based on the best scientific practices. The citizens of California and the rest of the world are watching!

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Rea

Signature on File

part
70

Dear Coastal Commission

I request that the Coastal Commission deny permit A-1-FTB-05-053-A6 to the applicants George-Pacific Corp.

Permitting a major corp to bury toxic soil on the coast will leave a toxic problem for ~~pe~~ generations to come. The site is inappropriate also being close to coastal bluffs & threats of Tsunami events.

Please require the soil contaminants be remediated on-site.

Thank you,

RECEIVED

JAN 07 2009

CALIFORNIA
COASTAL COMMISSION

J Signature on File

27760 W. Hwy 1

Fort Bragg, CA 95437

CA Coastal Commission

Dear Sirs and Madames,

I am writing concerning the Georgia Pacific Mill site in Ft. Bragg, CA. I am concerned that capping the dioxins and other toxins will simply be postponing this needed clean up and our children or their children will eventually be faced with the challenge of dealing with these toxins. Capping a coastal zone which is prone to earthquakes and sea level changes will increase the already great likelihood that these toxins, if capped, will leach into the ocean or water table. The option of mycoremediation can break down many toxins but such an option needs to be fully funded and explored. Our land is a precious resource, it's our foundation. It's all us humans.

really have when you get down to it. I know that bio and mycoremediation is more expensive but our community is willing to do whatever it takes to get this mess cleaned up in an environmentally friendly way. We can host fund raisers and a bio and mycore-mediation site would be a great eco tourism opportunity which can cover the costs.

Please help save our community for our healthy happy children.

Warmly,

Signature on File



RECEIVED

JAN 07 2009

CALIFORNIA
COASTAL COMMISSION

188 S. Harold Street
Fort Bragg, CA 95437

North Coast District Office
California Coastal Commission
Bob Merrell, District Manager
710 East Street, Ste. 200
Eureka, CA 95501

RECEIVED

JAN 05 2009

CALIFORNIA
COASTAL COMMISSION

RE: permit # A-1-FTB-05-053-A6

This letter is requesting that the California Coastal Commissioners deny the above permit to the applicants, Georgia-Pacific Corporation.

I remember how concerned the community was when we discovered the burning of toxic forest product and waste materials at the GP Mill cogeneration plant. Now GP wants to cap the resultant toxic, dioxin laden fly ash on site. How long will this fly ash be toxic? What happens as sea levels rise?

The US EPA has stated that no safe levels of dioxins have been determined. Capping this toxic material now will set a precedent for more capping at the Mill Site in the future.

Myco-remediation bench test negotiations are now underway. Dr. Jack Word of New Fields Laboratory, and Paul Stamets plan to try soil samples using a variety of fungi, not just white rot fungus. Please allow ample time for these fungal remediation tests to occur.

Allowing a large corporation to bury toxic soil on the coast sets a dangerous precedent, is not a Coastal Dependent Activity, and will leave a dangerous toxic hazard for many generations.

Please allow temporary capping and insist Georgia Pacific look for an alternative to clean up this soil.

Sincerely,

Signature on File 

Brent Rusert

Post Box 69
Caspar, Calif. 95420

Bob Merrill, District Manager
North Coast District Office
California Coastal Commission
710 E. Street, Suite 200
Eureka, Calif. 95501

RECEIVED

JAN 05 2009

CALIFORNIA
COASTAL COMMISSION

Dear Mr. Merrill & Members of the Commission:

Re: Fort Bragg Mill Site.

My involvement in the mill site debate began in late June, four years ago when I joined twenty other citizens to question the idea, floated by the public relations firm Fugoe West, and supported by three votes on the Fort Bragg city council to open the mill site to families wishing to park and view the Forth of July fireworks.

The mill site had not then been thoroughly characterized yet (it still hasn't been) and yet the City Council seemed determined to demonstrate that the mill site was safe for families and children.

It was, and is, not.

This decision suggested a favoring of public relations over responsibility, because it was already established that numerous toxics, including deadly Dioxin, had been found in many places on the mill site, and, we felt, inviting families to spread blankets on top of contaminated soil gave an erroneous impression.

The twenty who spoke against this proposal were pointed, well prepared, knowledgeable and eloquent. No citizen spoke in favor. No one in the room supported the idea except the representative of Fugoe West, the City Manager, and three favorable votes on the City Council.

In spite of the testimony of the twenty who spoke against this plan it was passed by a vote of three to two on the City Council.

But the testimony of the twenty citizens who spoke against this ill-considered idea spoke so clearly, if not impassionedly, that their recorded testimony was deemed worthy of being recorded and re-broadcast on three separate occasions on the county-wide public radio station KZYX.

This generated significant opposition to the Forth of July Plan and raised other serious questions about the handling of the mill site clean-up.

The campaign to give the impression that the mill site was safe was quietly dropped, and three subsequent Forth of July's have come and gone with no further attempt to invite families on to the site.

Six months later, the issue of control of the mill site clean-up emerged.

The issue revolved around which organization was going to be the "lead agency" in the clean-up effort.

Was it to be the California Department of Toxics and Substance Control, the acknowledge experts in the State of California when it comes to toxic clean-up, or the City of Fort Bragg, which had no knowledge, expertise, history or experience of cleaning up anything?

Who wanted the DTSC to be the "lead agency" to supervise and control the mill site clean-up? Forty citizens who spoke that night, including myself, who sharply questioned the purpose of selecting the City of Fort Bragg over the DTSC.

This turned on the question of how to interpret the recent passage of the Polanco Act, legislation allowing cities to be designated as the "lead agency" to effectuate small clean-up problems, but never a clean-up challenge of the magnitude of the mill site.

One City Council member's vote against DTSC was also questioned because of his long-standing employment as senior management of the Georgia Pacific Co. and his continued role as a consultant to that firm.

But the Fort Bragg City Attorney, who was called upon to rule on the situation, stated that in spite of decades of employment by the firm,

one year past severance from the firm was all that was required to comply with City conflict-of-interest regulations, even if an individual still consulted with the company on a regular basis as was admitted.

The City Attorney's ruling did not sit well with those in the audience because turning on that decision was control of the clean-up. The three votes favoring the city's bid to control the clean-up were the same three votes that earlier brought us the Forth of July public relations campaign.

No citizen spoke in favor of the City being the lead agency for the clean-up, which raises the question, besides the three City Councilmen, who favored this?

The answer to that question became clear. The Georgia Pacific Corporation, former owner of the mill-site, and acting as the agent of the Koch Industries Corporation was part and parcel in favor of what some claimed was a major stretching of the Polanco Act, which heretofore had never been applied to a World Challenge Class industrial-grade clean-up of the magnitude of the G.P. mill site.

And what would motivate the corporation to take such action on the issue?

Perhaps, in looking at DTSC, the clean-up experts, and looking at the Fort Bragg City Council, corporate decision-makers saw their three vote majority on the Council as the "softer option," a way to get through the clean-up process with an eye to the bottom line and looking after the shareholders.

And their profit margins.

We know corporations often look at their financial dealings and obligations in this manner.

But is that approach right or fair to the citizens of Fort Bragg and environs, who would have to live with the toxic threat for the indefinite future?

Most of the people in the audience of forty that evening didn't think so.

Nevertheless, the Fort Bragg City Council took on the responsibilities of the lead agency in the mill site clean-up that night, as per the Polanco Act, the scope and definition of which had now been extended in the way mentioned above.

The Georgia Pacific Corporation, one can only presume, got the "soft option" they preferred.

In spite of assurances that DTSC would be "part of the team," it was clear that three votes on the City Council had injected themselves into the power of decision-making re: mill site clean-up, against the wishes of many who showed up that cold January evening.

Citizens felt we were in for the cheapest, quickest, most minimal clean-up the corporation would propose, and subsequent events did nothing to prove us wrong, witness the issue in front of the Coastal Commission today.

Before I get on to the mushrooms and the proposed pit of toxins, let me make a few further observations impacting this situation:

One: Thais Masur of Fort Bragg, a long-time leading proponent of a credible and thorough cleanup of the mill site, showed me a large, wall-size aerial photograph of the city, the mill site and the McGuire Ranch just north of the city.

Before Commissioners vote on anything having to do with the City of Fort Bragg, I suggest a member arrange somehow to see this photograph, then they will see the full magnitude and size of the clean-up problem.

One can see from the photo the City and environs as three big chunks. The mill site (appox. 400 acres), the City, the build-out roughly the same size as the mill site, and an equally large chunk of land, the McGuire ranch, sitting directly north of the City, covered with huge windrows of fly ash from the mill.

From the air, each windrow is considerably larger than any building in the City, even Timberwolf Football Stadium, and there are, perhaps, a dozen of these uncovered windrows of fly ash, the prevailing wind carrying the dust directly over the town.

That's a very bad situation, and what we have before the Coastal Commission is a decision on how to go about dealing with a very small solution to a much vaster problem.

Two: Now we move to May tenth of this year. I was summoned to a meeting at the Fort Bragg Library that morning, along with some twenty other citizens concerned about these issues of the mill site and toxic problems.

Jody Sparks, an expert in the field of detoxification, brought with her to the meeting a large map from the Bancroft library of the Univ. of California Berkeley.

The date of the map was 1960, and it was of the entire mill site, when the mill site was owned by the Union Lumber Company.

The twenty of us spent several hours pouring over this huge map, all of us coming to the decision that there were many other contaminated sites on the mill site than previously accounted for in the years any of us had been involved in this issue.

The summary of opinion in the room could be generalized in the statement, the mill site clean-up had just gone from huge to staggering in our estimation of the situation, based on new information before us. Does the City Council even have this information at this time?

Three: Then came Paul Stamitz to Crown Hall, Mendocino to a SRO crowd of 250, and the hope that mushrooms would allow us to address these issues of toxins in a whole new way, and with some hope that an effective clean-up could be achieved.

But standing in the way of that eventual happy day is the proposal before you, a toxic pit, containing (inevitably) Dioxin, the most deadly substance known to man, several hundred yards from the busiest intersection in the City, lined with a plastic diaper-like arrangement guaranteed to last thirty years.

What happens after that?

I hope you will agree with me that a toxic waste pit, built under the circumstances and in the location of this one, is no more than a half-measure at best, the shifting of a toxic problem three decades into the future in hopes it will go away and be forgotten.

The Georgia Pacific Company made vast sums of money for decades, extracting the resources of Mendocino County and milling timber in Fort Bragg. Band-aid clean-ups are not the answer and do not sit well with many citizens who will have to live with the continuing toxic threat posed by the mill.

For the safety of the citizens the community needs for a thorough clean-up must be addressed. This proposal doesn't do that.

Thank you for your kind attention to my views. I hope these comments and observations will help guide you to vote intelligently on the critical issue before you.

Regards,
Jonathan Shepard

SIGNATURES ON FILE

Dear Bob Mario (sp)
North Coast California Coastal Commission
710 East Street Suit 200
Eureka, Ca 95501

RECEIVED

JAN 05 2009

CALIFORNIA
COASTAL COMMISSION

Dear Sirs:

Would you please give Paul Stamat's (sp) Mushroom Micro Remediation
an honest look and consideration. For the Fort Bragg, Ca. Mill site clean up of Dioxin
and more. He may be on to something. And this could be an amazing solution!

Thank you

Michael Matthey



Signature on File



Caspar, Ca 95420