

**CALIFORNIA COASTAL COMMISSION**

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# W 15b

## MEMORANDUM

Date: February 3, 2008

To: Commissioners and Interested Parties

From: Peter Douglas, Executive Director  
Robert S. Merrill, District Manager – North Coast District

Subject: **Addendum to Commission Meeting for Wednesday, February 4, 2008  
North Coast District Item W15b, Permit Amendment Request No. A-1-FTB-  
05-053-A6 (Georgia Pacific Corporation)**

The requested permit amendment would authorize on-site consolidation and capping of approximately 13,000 cubic yards of dioxin/furan-impacted soil at the former Georgia-Pacific California Wood Products Manufacturing Facility located in Fort Bragg, Mendocino County. The consolidation cell would be installed pursuant to a Remedial Action Plan (RAP) approved by the Department of Toxic Substances Control. To provide additional information about the DTSC approved Remedial Action Plan (RAP) for the project, the addendum contains attachments including the Executive Summary, a Fact Sheet about the RAP, and a link to a website containing the full RAP. In addition, the addendum includes changes to the staff recommendation. One of these changes is to modify recommended Special Condition 12 to correct an oversight regarding the length of authorization that would be granted by the permit amendment for the contaminated soil consolidation cell. The other change is to add a visual resource protection finding to address the project's consistency with the visual resource protection policies of the certified Fort Bragg LCP. Finally, this addendum includes correspondence received from the public since publication of the revised staff recommendation on January 23, 2009. This addendum supplements the staff report's response to public comments.

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**I. Additional Information About DTSC Approved Remedial Action Plan.**

Exhibit No. 6 of the staff recommendation is a copy of the letter by which DTSC approved the Final Remediation Plan (RAP) for the project. During the hearing at the December 2008 Commission on the permit amendment, it was requested that additional information about the DTSC's analysis of the contaminated soil consolidation cell be provided. The Final RAP was revised before being approved by DTSC to reflect the basis for approval by DTSC. The RAP therefore reflects the analysis provided by DTSC. The RAP itself is over 640 pages long. To save paper and postage costs, staff did not include the RAP as an attachment to the revised staff recommendation. However, the Executive Summary and a Fact Sheet about the RAP are attached to this addendum as Attachments A and B, respectively. The entire RAP can be viewed at the following public web site:

[http://www.envirostor.dtsc.ca.gov/public/community\\_involvement/3789121329/OU-A%20RAP%20Final%20August%202008.pdf](http://www.envirostor.dtsc.ca.gov/public/community_involvement/3789121329/OU-A%20RAP%20Final%20August%202008.pdf)

**II. Modification to Special Condition No. 12 of the Staff Recommendation**

Staff is making a slight revision to Special Condition No. 12 to correct an oversight. The special condition limits the authorization of the amended permit to the time period that passes before the Department of Toxic Substances Control completes its five-year review of the final remediation plan. After DTSC has completed action on its re-evaluation of the remedial action plan, Special Condition No. 12 would require the permittee to submit an application for a new permit to either remove the consolidation cell or retain the consolidation cell in place. The permit application must be accompanied by an alternatives analysis for the remediation of the dioxin/furan impacted soils, including, but not limited to the use of bioremediation techniques or other advanced remediation technologies available at the time. The oversight is that by limiting the period of authorization of retention of the consolidation cell under the current permit amendment to the point when DTSC completes its five-year re-evaluation, the consolidation cell would exist without coastal development permit authorization from that point onward until the time the Commission acts on the subsequent permit application. In effect, the condition as originally written would create a violation for that period of time. To correct this problem, the revised language below would extend the authorization period of the current permit amendment to the point when the Commission has completed its review of the subsequent coastal development permit application.

The revisions to Special Condition No. 12 of the staff report dated January 23, 2009 are shown below. Text to be deleted is shown in ~~bold strikethrough~~; text to be added appears in **bold double-underline**.

**12. Time Period for Which Consolidation Cell for Dioxin Impacted Soil is Authorized**

The authorization granted by this coastal development permit for the use of the consolidation cell for dioxin impacted soil shall be valid until the California Department of Toxic Substances Control (DTSC) has completed its five-year re-evaluation of the Final Operable Unit A Remedial Action Plan approved on August 28, 2008, ~~and the~~ **Commission has completed its review of the subsequent coastal development permit application required below**. No later than 90 days after DTSC has taken final action on the re-evaluation, or within such additional time as the Executive Director may grant for good cause, the permittee shall either:

- A. Submit a coastal development permit application to the Commission for removal of the consolidation cell and the dioxin impacted soil contained within the cell, or
- B. Submit a coastal development permit application to the Commission for the retention and continued use of the consolidation cell for dioxin impacted soil, accompanied by:
  - i.) An analysis of the effectiveness of the consolidation cell in containing the dioxins/furans present in the soil and preventing these contaminants within the consolidation cell from adversely affecting groundwater and other environmental resources, and
  - ii.) A new analysis of alternatives to the authorized consolidation cell authorized by Coastal Development Permit Amendment No. A-1-FTB-05-053-A6 for the remediation of the dioxin/furan-impacted soils including, but not limited to the use of bioremediation techniques and other advanced remediation technologies available at the time, taking into account the relative impact of the various alternatives on coastal resources and the criteria set forth by the Environmental Protection Agency (USEPA) and DTSC for evaluating remediation alternatives.

### **III. Addition to Findings of the Staff Recommendation**

Insert the following finding entitled, “F. Visual Resource Protection,” on Page 46 of the staff report between the Locating New Development Finding and the California Environmental Quality Act (CEQA) finding. The CEQA finding shall be renumbered as Finding G:

#### **F. Visual Resource Protection**

##### LCP Provisions

LUP Policy CD-1.1:

Visual Resources: Permitted development shall be designed and sited to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural landforms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance scenic views in visually degraded areas.

LUP Policy CD-1.4:

New development shall be sited and designed to minimize adverse impacts on scenic areas visible from scenic roads or public viewing areas to the maximum feasible extent.

LUP Policy CD-1.5 and LUDC Section 17.50.070(J):

All new development shall be sited and designed to minimize alteration of natural landforms by:

1. Conforming to the natural topography.
2. Preventing substantial grading or reconfiguration of the project site.
3. Minimizing flat building pads on slopes. Building pads on sloping sites shall utilize split level or stepped-pad designs.
4. Requiring that man-made contours mimic the natural contours.
5. Ensuring that graded slopes blend with the existing terrain of the site and surrounding area.
6. Minimizing grading permitted outside of the building footprint.
7. Clustering structures to minimize site disturbance and to minimize development area.
8. Minimizing height and length of cut and fill slopes.
9. Minimizing the height and length of retaining walls.
10. Cut and fill operations may be balanced on-site, where the grading does not substantially alter the existing topography and blends with the

surrounding area. Export of cut material may be required to preserve the natural topography

LUDC Section 1750.070(D):

General findings for approval. Coastal Development Permit approval for development ...shall require that the review authority first find that the proposed project:

1. Minimize the alteration of natural landforms;
2. Is visually compatible with the character of the surrounding area;
3. Is sited and designed to protect views to and along the ocean and scenic coastal areas; and
4. Restores and enhances visual quality in visually degraded areas, where feasible.

LUDC Section 1750.070(E)(1):

#### Discussion

Development shall be sited and designed to minimize adverse impacts on scenic areas visible from scenic roads or public viewing areas to the maximum feasible extent.

The 435-acre project site is situated between Highway One, the Noyo River, and the Pacific Ocean (see Exhibit No 2). The property is not situated within a scenic view area as designated in the LUP. Thus, many of the LCP's policies and standards regarding visual resource protection are not applicable to the project site and its surroundings. The closest designated scenic view areas are located north of the applicant's lands in the vicinity of the mouth of Pudding Creek approximately ½ mile to the north of the project site and along the lower Noyo River to the south of the site. Both of these view areas have ocean and coastline views oriented away from the subject property. Due to the property's location on private roads, the surrounding private land development pattern, and the elevation of the uplifted marine terrace on which the project is situated, public views to and along the ocean across the property from along the west side of Highway One are limited.

Additionally, given the presence of mature vegetation and intervening structures between the highway and project parcel, views of the site from Highway One vantage points are limited to a relatively brief gap in the roadside industrial, commercial, and residential development along this route as it passes the property's highway frontage. Similarly because of the site's elevated terrace topography relative to the shoreline, views across the project property from along the West Elm Street public accessway to Glass Beach are

limited to distant horizon views of the ocean and/or are oriented westward towards the shoreline and ocean areas directly offshore of Glass Beach.

The proposed grading and installation of the contaminated soil consolidation cell will likely be visible to some extent from some public vantage points surrounding the property. However, the construction activity will be a temporary activity and will not result in significant long-term impacts to the visual resources of the project area. The consolidation cell itself will be constructed below the existing grade (See Exhibit 5) with the cap covered with clean soil that will be vegetated. The material excavated to create the cell will be used to backfill the source areas from which the contaminated soil will be removed to be placed in the cell. No elements of the consolidation cell will rise above the existing grade. Therefore, once the consolidation cell has been completed, the development will not block any coastal views, will not alter the existing topography, and will blend with the surrounding vacant land, consistent with LUP Policies CD 1-1, 1-4, and 1-5 and with Sections 1750.070(D) of the Coastal Zoning Ordinance.

Furthermore, as subsequent development is undertaken at the mill site pursuant to a reuse plan currently in development, the City and the Commission through review of any related LCP amendments and/or in consideration of any associated subsequent coastal development permit actions, will have opportunities to assess the effects such structural redevelopment would have on visual resources of the area. These LCP amendment and permit reviews will also provide an occasion for ensuring that all related grading and utility extensions are similarly performed consistent with the LCP.

Therefore, the Commission finds that the installation of the consolidation cell as proposed and conditioned is consistent with the visual resource protection provisions of the certified LCP.

#### **IV. Additional Correspondence Received**

Since publication of the staff recommendation on January 23, 2009, the Commission has received a number of items of correspondence on the proposed permit amendment from the public. Copies of the correspondence are included in Attachment C to this addendum.

## Executive Summary

This document was prepared by ARCADIS BBL on behalf of Georgia-Pacific LLC (Georgia-Pacific) and presents a Remedial Action Plan (RAP) and feasibility study (FS) to address contaminated soils within Operable Unit A (OU-A) at the former Georgia-Pacific Wood Products Facility (site) located at 90 West Redwood Avenue, Fort Bragg, Mendocino County, California (Figure 1-1). This RAP, which includes a FS component, is required by the Department of Toxic Substances Control (DTSC) under Sections 5.7 and 5.11 of the Site Investigation and Remediation Order for the site (Docket No. HSA-RAO 06-07-150; the Order).

## Background

The approximately 415-acre site is located west of Highway 1 along the Pacific Ocean coastline and is bounded by open coastline to the north, Noyo Bay to the south, the City of Fort Bragg (City) to the east, and the Pacific Ocean to the west. According to historical records, Union Lumber Company (ULC) began sawmill operations at the site in 1885. Georgia-Pacific acquired the site in 1973 and ceased lumber operations on August 8, 2002. OU-A is defined in the Order as an approximately 100- to 110-foot-wide pathway that traverses the top of the coastal bluff. In addition, OU-A includes an approximately 30-acre parkland area (Figure 1-2). The western boundary of OU-A is the mean high tide line. The total acreage of OU-A is approximately 87 acres. OU-A includes two geographically separate units that will be referred to as OU-A North (22 acres) and OU-A South (65 acres). For purposes of discussion, each of the geographic units within OU-A (OU-A North and OU-A South) was further subdivided into smaller areas of interest (AOIs), which are areas where historical activities could have resulted in a release of hazardous substances. The Remedial Investigation (RI) Report (ARCADIS BBL, 2008) identified the following AOIs that to be addressed in this RAP:

- Glass Beach 2, OU-A North
- Scrap Yard/Geophysical Anomaly Area, OU-A North
- Parcel 10 Fill Area, OU-A South

### Conceptual Site Model

On the basis of the history and operations of the site and the results of the RI Report, polychlorinated biphenyls (PCBs) and lead were identified as chemicals of concern (COCs) for OU-A North and dioxins/furans were identified as COCs in both OU-A North and OU-A South.

OU-A is planned to be developed as trails and parkland for recreational use; there are no plans for residential or commercial/industrial development. Limited construction activities are anticipated during park and trail development as well as ongoing maintenance activities. Therefore, the human receptors that were evaluated in OU-A were adult and child recreators, construction workers, and utility/trench workers. The ecological receptors evaluated in OU-A were terrestrial plants, mammals, and birds.

### Investigations and Presumptive Remedy Areas (PRAs)

The OU-A RI Report provided a summary of the previous soil investigations and investigations conducted in 2007 to fill identified data gaps throughout OU-A (ARCADIS BBL, 2008), including additional samples collected from three areas in December 2007. Based on those results, seven PRAs within the three AOIs listed above were identified in OU-A as requiring remedial action. A PRA was initially defined as an area that likely poses an unacceptable risk or exhibits other criteria that would require remedial action regardless of the results of any risk evaluations, as follows:

- Presence of metals above the California Hazardous Waste threshold (California Code of Regulations Title 22 Social Security, Division Health Standards for the Management of Hazardous Waste, Chapter 11)
- Presence of PCBs above the action level for PCBs (under the performance-based approach) from the Toxic Substances Control Act (TSCA) (40 CFR 761.3)
- Presence of "significant" hot spots – areas where two or more adjacent sample locations had concentrations that were 10 times or more the residential California Human Health Screening Level (CHHSL). The CHHSL is the concentration that the California Environmental Protection Agency (CalEPA) considers to be below thresholds of concern for risks to human health. The 10-fold criterion was selected as a means of identifying areas that could constitute hot spots and was used in the risk evaluations in the OU-A RI Report to exclude data from the risk assessment. The results of the risk assessment showed that this criterion successfully identified

areas that, if removed, would reduce risks to acceptable levels (discussed further herein).

#### Lead PRA, Glass Beach 2, OU-A North

Lead concentrations were elevated in one area along the bluff where debris was identified. Concentrations at four of the seven locations in this area and to a depth of 2 feet below ground surface (bgs) exceeded the Preliminary Remediation Goal and CHHSL (150 milligrams per kilogram [mg/kg]). Lead concentrations ranged up to 790 mg/kg. Waste extraction tests also showed lead above the Soluble Threshold Limit Concentration (STLC), making lead-impacted soil in this area a California Hazardous Waste. Soil in this area is proposed to be removed to a depth of approximately 2 feet.

#### Dioxin PRA, Glass Beach 2, OU-A North

Including the December 2007 data, tetrachlorodibenzo-*p*-dioxin (TCDD) toxic equivalent (TEQ) concentrations ranged from 0.36 to 130 picograms/gram (pg/g) in OU-A North. Concentrations were greater than 10 times the CHHSL in two adjacent samples at Glass Beach 2. Because of these elevated concentrations, this area has been identified as a dioxin PRA. Soil in this area is proposed to be removed to a depth of approximately 1 foot bgs.

#### PCB PRA, Parcel 3 Scrap Yard/Geophysical Anomaly Area, OU-A North

The analytical results from Parcel 3 Scrap Yard/Geophysical Anomaly Area showed elevated PCB concentrations within the northern portion of the Parcel 3 Geophysical Anomaly Area. Screening-level exceedances were limited to the surface soil, concentrations at nine locations were more than 10 times CHHSL of 0.089 mg/kg, and several locations were above the TSCA action level of 1 mg/kg for a self-implementing cleanup. Soil in this area is proposed to be removed to a depth of approximately 6 to 12 inches bgs.

#### Dioxin PRAs, Parcel 10 Fill Area, OU-A South

Including the December 2007 data, the analytical results from Parcel 10 Fill Area showed TCDD TEQs ranging from 0.004 to 316 pg/g. TCDD TEQ concentrations met the criteria for a PRA at four areas within the Parcel 10 Fill Area. Soil in these areas is proposed to be removed to depths ranging from 2 to 5 feet bgs.

### Remedial Action Objectives (RAOs)

RAOs are guidelines used in the development of potential remedial action alternatives and selection of a proposed remedial action. The RAOs presented herein have been developed based on the current environmental conditions and anticipated future use of the site for passive recreational purposes. The following RAOs were identified for the site:

- Provide a remedy that will reduce long-term risks to acceptable levels and protect human and ecological receptors under the anticipated passive recreational land-use scenario
- Provide a technically and economically feasible remedy for soil
- Provide a property suitable for the planned reuse consistent within a time frame suitable for the proposed property transfer.

Using the appropriate guidance and methods (CCR Title 22, 40 CFR 761.3, site-specific risk-based levels), risk-based target levels (RBTLs) were calculated to screen post-confirmation results. These RBTLs will be compared to post-remedy exposure estimates (i.e., 95% Upper Confidence Limits [95%UCLs]) to determine whether post-remedy conditions are protective of human and ecological receptors.

Remedial goals for lead include:

- Removal of lead that meets the definition of a California Hazardous Waste (CCR Title 22 Social Security, Division Health Standards for the Management of Hazardous Waste, Chapter 11).
- Post-remedial exposure point concentrations (EPCs; 95%UCL) not exceeding 80 mg/kg, which represents the lower of the RBTLs that are greater than background for the most sensitive human receptor (523 mg/kg) or ecological receptor (80 mg/kg).
- Based on the EPC estimates in the OU-A RI Report (ARCADIS BBL, 2008), the post-remedial EPC (95%UCL) was predicted as 24 mg/kg, which will meet the goals above.

Remedial goals for PCBs include:

- Removal of PCBs above the action level of 1 mg/kg for PCBs (under the self-implementing approach) from TSCA (40 CFR 761.3).
- Post-remedial EPCs (95%UCL) not exceeding 1 mg/kg, which represents the lower of the RBTLs for the most sensitive human receptor (8.8 mg/kg) or ecological receptor (1 mg/kg).
- Based on the EPC estimates in the OU-A RI Report (ARCADIS BBL, 2008), the post-remedial EPC (95%UCL) was predicted as 0.008 mg/kg, which will meet the goals above

Remedial goals for dioxin/furans include:

- Post-remedial EPCs (95%UCL) expressed as total mammalian TEQs not exceeding 53 pg/g, which represents the lower of the RBTLs for the most sensitive human receptor (53 pg/g) or ecological receptor (59 pg/g).
- Based on the EPC estimates in the OU-A RI Report (ARCADIS BBL, 2008), the post-remedial EPC (95%UCL) was predicted as 15 pg/g, which will meet the goals above.

### Analysis of Removal Action Alternatives

#### Evaluation Criteria

According to USEPA and DTSC guidance, the following nine criteria must be used to evaluate remedial alternatives (USEPA, 1988; DTSC, 1995). For an alternative to be selected, it must meet the first two criteria, threshold criteria, which are 1) overall protection of human health and the environment, and 2) compliance with Applicable or Relevant and Appropriate Requirement (ARARs). Criteria 3 through 7 are the five primary balancing criteria that provide comparisons between the alternatives and identify tradeoffs between them, and criteria 8 and 9 are the two modifying criteria that consider acceptance by the state and local community. The nine criteria are as follows:

1. Overall Protection of Human Health and the Environment: whether or not a remedy provides adequate protection of human health and the environment.
2. Compliance with ARARs: whether or not a remedy will meet all appropriate federal, state, and local environmental laws and regulations.

3. Long-Term Effectiveness and Permanence: ability of a remedy to maintain reliable protection of human health and the environment over time, once cleanup goals have initially been met.
4. Reduction of Toxicity, Mobility, and Volume through Treatment: ability of a remedy to reduce the toxicity, mobility, and volume of the hazardous substances or constituents present at the site.
5. Cost – 30-Year Present Worth: estimated 30-year present worth capital and operation and maintenance costs. Level of accuracy of the costs estimated is “Order of Magnitude,” as defined by the American Association of Cost Engineers (i.e., plus 50 percent and minus 30 percent).
6. Short-Term Effectiveness: period of time needed to complete the remedy and any adverse impact on human health and the environment that may be posed during the construction and implementation period, until the cleanup standards are achieved.
7. Implementability: technical and administrative feasibility of a remedy, including the availability of materials and services needed to carry out a particular option.
8. State Acceptance: whether, based on current knowledge of regulations and agency mandates, the applicable regulatory agencies would agree with the preferred alternative. Actual assessment depends on comments received during the agency review and public comment periods.
9. Community Acceptance: whether community concerns are addressed by the remedy, and whether the community has a preference for a remedy. Considered preliminary because actual assessment depends on comments received during public comment period.

#### Development of Removal Action Alternatives

The following alternatives were evaluated to address each PRA (see Figures 4-1 through 4-4):

- No Action: Used as a basis of comparison when screening alternatives, and does not include any remedial actions.

- **Land Use Restriction/Controls:** Administrative actions or institutional controls that would restrict the uses of and access to the site. For this site, the future land use is passive recreational use (coastal trail and parkland) and land use restrictions will be in place as part of the conditions placed on the land by the Coastal Conservancy and in the purchase and sale agreement. DTSC will remain as the lead agency in the determination of what land use restrictions are necessary.
- **Removal/Offsite Disposal:** Excavating, direct loading, and trucking the material that exceeds the remedial goals offsite to an appropriate Class I (for soil shown to be California Hazardous Waste for lead) or Class II disposal facility. The excavations would be backfilled with clean fill and/or regraded to an even, relatively flat surface and revegetated.
- **Consolidation and Capping:** Excavating material that exceeds the remedial goals, consolidating the material into a cell in one onsite location, and placing an engineered cap (including polyvinyl chloride liner [PVC]), geosynthetic clay liner, and clean soil/revegetation and/or road base/asphalt) over the material (Figure 4-5). The material excavated from the cell location would be used to backfill the source areas and/or the areas would be regraded to provide an even, relatively flat surface. The material would be consolidated and capped so that the impacted material would not be in contact with groundwater.
- **Bioremediation:** Recalcitrant compounds such as PCBs and dioxins/furans degrade at an extremely slow rate and microbial degradation has been shown to be limited. Evaluation of bioremediation indicated that the time associated with implementation would not meet the requirements for property transfer, the physical conditions (temperature, soil pH) are not favorable, successful field trials are lacking, concentration reductions are likely insufficient to meet remedial goals, and the cost is likely similar or higher than other alternatives being evaluated. Bioremediation was not evaluated further.

### Alternatives Analysis

The alternatives for each PRA were evaluated using the nine criteria as presented below and in Tables 4-1, 4-2, and 4-3. The five dioxin PRAs (one in OU-A North and four in OU-A South) were evaluated together as the contaminant is the same and thus, the remedy will be the same. Each of the alternatives was given a rank of low, medium, or high for each of the nine criteria.

Lead PRA, Operable Unit A North – Glass Beach 2

The three alternatives that were evaluated for the Lead PRA were No Action, Land Use Restriction/Controls, and Removal/Offsite Disposal. The No Action and Land Use Restriction/Controls alternatives would not meet the threshold criteria of protection of human health and the environment and compliance with ARARs, nor would they be acceptable to the state or community. The Removal/Offsite Disposal alternative would involve excavation of about 140 cubic yards of impacted soil to a depth of approximately 2 feet. The excavated soil would be transported to and disposed of as California Hazardous Waste at the Class I Waste Management, Inc. Kettleman Hills Landfill in Kettleman City, California. This alternative ranks medium to high in all nine criteria. The estimated present value is approximately \$43,000.

PCB PRA, Operable Unit A North – Scrap Yard

The three alternatives that were evaluated for the PCB PRA were No Action, Land Use Restriction/Controls, and Removal/Offsite Disposal. The No Action and Land Use Restriction/Controls alternatives would not meet the threshold criteria of protection of human health and the environment and compliance with ARARs, nor would they be acceptable to the state or community. The Removal/Offsite Disposal alternative would involve excavation of about 990 cubic yards of impacted soil to a depth of approximately 1 foot. The excavated soil would be transported to and disposed of as non-hazardous at the Allied Waste Services Keller Canyon Landfill in Pittsburg, California (Keller Canyon: a Class II, Subtitle D permitted landfill). This alternative ranks medium to high in all nine criteria. The estimated present value is approximately \$220,000.

Dioxin PRAs, Operable Unit A North – Glass Beach and Operable Unit A South – Parcel 10

The five dioxin PRAs, although not contiguous, were evaluated together. The four alternatives that were evaluated were No Action, Land Use Restriction/Controls, Removal/Offsite Disposal, and Consolidation and Capping. The No Action and Land Use Restriction/Controls alternatives would not meet the threshold criteria of protection of human health and the environment and compliance with ARARs, nor would they be acceptable to the state or community. The Removal/Offsite Disposal alternative would involve excavation of about 13,000 cubic yards of impacted soil and transport to and disposal of the material as non-hazardous at the Allied Waste Services Keller Canyon Landfill in Pittsburg, California (Keller Canyon; a Class II, Subtitle D permitted landfill). The Consolidate and Cap alternative would include placing the 13,000 cubic yards of

excavated material in a cell approximately 6 feet in depth and 1.3 acres in size with a PVC liner on the bottom and a geosynthetic clay liner on top. The surface layer could include a vegetated soil cap or asphalt.

The ranking is medium to high for all criteria, although community acceptance of the consolidation and capping is ranked as low to medium. However, actual community acceptance will not be known until the public has an opportunity to comment on the RAP. The present worth value of the Removal/Offsite Disposal alternative is \$2.5 million, whereas that for the Consolidation and Capping alternative is \$1.5 million.

#### **Recommended Alternatives**

Based on the nine evaluation criteria, the recommended alternative for each of the PRAs is presented below. Each of the alternatives would include land use restrictions that would prevent sensitive uses (such as residences, hospitals, day care facilities, schools, etc.), which is consistent with the planned future use of the area as a coastal trail and park. DTSC will remain as the lead agency in the determination of what land use restrictions are necessary.

- Lead PRA, Operable Unit A North – Glass Beach 2: Removal and offsite disposal is the recommended alternative for the Lead PRA in OU-A North – Glass Beach 2.
- PCB PRA, Operable Unit A North – Scrap Yard: Removal and offsite disposal is the recommended alternative for the PCB PRA in OU-A North – Scrap Yard.
- Dioxin PRAs, Operable Unit A North – Glass Beach 2 and Operable Unit A South – Parcel 10: Consolidation and capping is the recommended alternative for the dioxin PRAs in Glass Beach 2 and the Parcel 10 Fill Area.

#### **Areas Unlikely to Require Deed Restriction Following Remediation**

Following remediation, there likely will be three areas where soil will be below CHHSLs (Figure 5-1). These areas are unlikely to require land use restrictions. The remaining areas are those where land use restrictions are likely.



Department of  
Toxic Substances  
Control

*The Mission of  
the Department of  
Toxic Substances  
Control is to  
provide the highest  
level of safety, and  
to protect public  
health and the  
environment from  
toxic harm.*



State of California



California  
Environmental  
Protection Agency

Fact Sheet, March 2008

## Draft Remedial Action Plan for The Georgia-Pacific Mill Site Operable Unit A is Available for Review

The draft Remedial Action Plan (RAP) for the Coastal Trail and Parkland Zone (also known as Operable Unit A (OU-A)) of the former Georgia-Pacific Mill Site located at 90 West Redwood Avenue, Fort Bragg, Mendocino County, California is now available for public review and comment. The draft RAP describes the proposed remedial alternatives to address soil contaminated with lead, polychlorinated biphenyls (PCBs), and dioxins/furans within the OU-A.

The Department of Toxic Substances Control (DTSC) encourages you to review and comment on the draft RAP. Comments may be provided at the upcoming Public Meeting, via the telephone, e-mail, or US Postal Service. Contact information is listed in the box below and located on page 4 of the fact sheet.

There is no immediate health risk because the public is not exposed to contaminated soil or other environmental media. However, because investigations indicate the presence of contaminants in soil at concentrations that could pose a potential risk to human health and the environment, DTSC has recommended that a cleanup plan be prepared. DTSC will oversee the proposed remedial action and ensure that it is performed in a manner that does not harm people or the environment.

### PUBLIC MEETING

The Department of Toxic Substances Control will hold a Public Meeting to discuss and receive your comments on the draft Remedial Action Plan. The meeting is scheduled for March 26, 2008 from 7:00 p.m to 9:00 p.m. at the following location:

Redwood Elementary School  
324 South Lincoln Street  
Fort Bragg, California 95437

### PUBLIC COMMENT PERIOD - March 13 to April 14, 2008

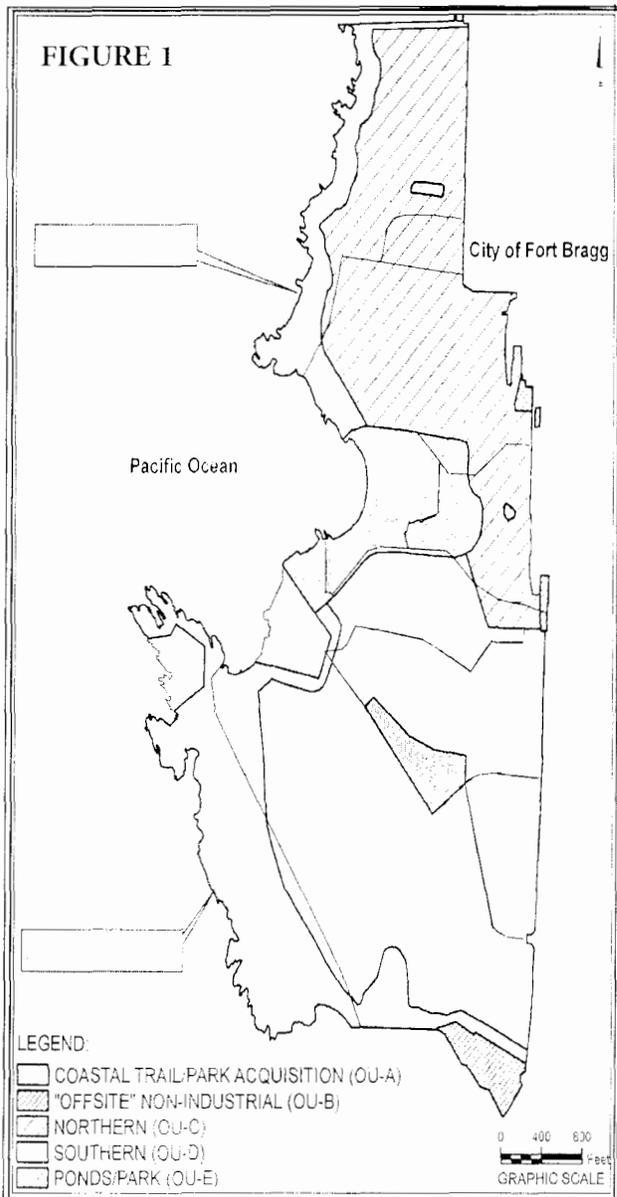
Submit comments to:

Edgardo Gillera, Project Manager  
Department of Toxic Substances Control  
700 Heinz Avenue  
Berkeley, CA 94710-2721  
[EGillera@dtsc.ca.gov](mailto:EGillera@dtsc.ca.gov)

Comments mailed must be postmarked by the deadline date of April 14, 2008 and comments e-mail, faxed, or telephoned must be received no later than 5:00 p.m. that same day. For additional information, please contact Edgardo Gillera at (510) 540-3826 or fax at (510) 540-3819.

## Site History

Sawmill operations began at the site in 1885. Georgia-Pacific acquired the site in 1973 and stopped lumber production in 2002. The cleanup plan addresses the Coastal Trail and Parkland Zone, designated as OU-A, which encompasses parcels planned for future development as a coastal trail and park. OU-A is made up of two separate areas, referred to as OU-A North and OU-A South (See Figure 1).



During active operations at the site, OU-A was primarily used for storing logs and untreated lumber. In addition to the mill operations, other site activities in these areas included material disposal and open burning.

## Environmental Investigations

Site investigations at OU-A have been ongoing since 2002 with a recent effort to fill data gaps under the oversight of DTSC. Data from all site investigations are summarized in the OU-A Remedial Investigation (RI) Report for the Coastal Trail and Parkland Zone, which was approved by DTSC on February 14, 2008.

The RI identified seven Presumptive Remedy Areas (PRAs), or areas to be remediated, where chemicals in soil were found above acceptable levels. The PRAs are in areas designated as Glass Beach 2 and the Parcel 3 Former Scrap Yard in OU-A North, and the Parcel 10 Fill Area in OU-A South. The contaminants of concern in these PRAs include lead, PCBs, and dioxins/furans.

## Proposed Cleanup Options

The cleanup options (also known as remedial alternatives) evaluated in the draft RAP for OU-A are:

- No action
- Land use restrictions/controls
- Soil removal with offsite disposal
- Consolidation and capping
- Bioremediation

Based on careful analysis of the options (see Sections 4 and 5 of the RAP) the following alternatives are recommended because they protect human health and the environment, are permanent and economically feasible. Land use restrictions/controls will be a component of all proposed alternatives that will prevent sensitive uses of the site in any areas that do not meet acceptable standards for residential use.

If soil removal and offsite disposal is the selected alternative for the lead-contaminated area in Glass Beach 2 and the PCB-impacted in the Parcel 3 Former Scrap Yard in OU-A North, contaminated soil would be excavated, directly loaded into trucks and transported to the appropriate offsite disposal facility. Approximately 140-cubic yards of lead-contaminated soil and 990-cubic yards of PCB-contaminated soil will be excavated. After the contaminated soil is excavated,

samples will be taken to confirm that the soils with contaminant concentrations above site remediation goals have been removed. The excavated areas will be backfilled with clean soil, regraded and revegetated.

If consolidation and capping is the selected alternative for the soils impacted with dioxins/furans in portions of Glass Beach 2 and Parcel 10 Fill Area in OU-A South, contaminated soil would be excavated and then consolidated in another area of the Site (see Figure 2). Approximately 13,000-cubic yards of dioxin/furan-contaminated soil will be excavated. The excavated material would be placed in consolidation cell of approximately 1.3-acres. The consolidation cell will be lined (with a synthetic liner) and covered with an engineered cap. The cap will prevent contact with the contaminated soil. The capped area will be revegetated or covered with asphalt. This alternative will require operation and maintenance of the engineered cap and long-term monitoring to ensure that the engineered cap is working properly. Land use restrictions will also be placed on the consolidation area to prevent sensitive uses of that area.

The locations of the areas to be remediated and the consolidation area is depicted in Figure 2.

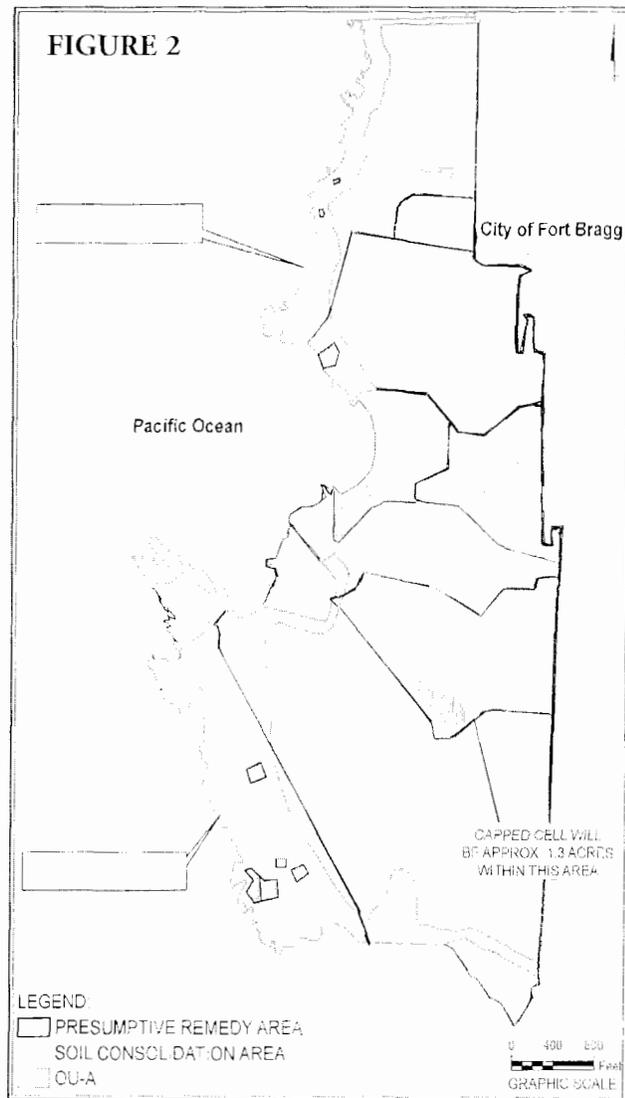
### Safety and Dust Control During Cleanup

The following actions will be implemented during this process to ensure public safety and minimize dust:

- Driving all vehicles at slow speeds while on the property
- Spraying of work areas, stockpiles and roadways with clean water to control dust
- Securing trucks with covers before they leave the site
- Truck tires entering and exiting the site will be brushed to remove soils and debris
- Monitoring the air at the site to ensure the amount of dust stays at safe levels

### Proposed Transportation Route for Trucks

Approximately 1,100-cubic yards of lead- and PCB-contaminated soil will be removed and taken offsite for disposal. It will take about 65 truckloads to remove the contaminated soil from the Site.



Trucks will leave the site down Hwy 20. Disposal facilities are state licensed and approved. This work will be limited to the hours between 6:00 am and 1:00 pm daily. The cleanup process is expected to take about 4 months.

### California Environmental Quality Act (CEQA)

In compliance with CEQA, DTSC has prepared an Initial Study to evaluate the potential impacts of the proposed project on the environment. The findings of the Initial Study indicate that the project should not have a significant effect on public health or the environment. Therefore, DTSC has prepared a proposed Negative Declaration for the OU-A cleanup. Both the Initial Study and proposed Negative Declaration are also available for review and comment during the public comment period.

## Next Steps

At the end of the public comment period, DTSC will review and respond to public comments and make any necessary revisions to the draft RAP for OU-A prior to final approval. Also, a response to comments document will be mailed to everyone who makes a comment and provides their name and address. The soil removal is expected to take place from spring to fall of 2008. After the cleanup is done, Georgia-Pacific will conduct soil testing to confirm cleanup goals have been reached and submit a Completion Report to DTSC for review and approval.

## Where to Find the Documents

The draft RAP and other site-related documents are available for review at the following locations:

### *Information Repository*

Fort Bragg Library  
499 East Laurel Street  
Fort Bragg, CA 95437  
(707) 964-2020  
Sunday & Monday: Closed  
Tuesday & Thursday: 10:00 am to 6:00 pm  
Friday & Saturday: 10:00 am to 5:00 pm  
Wednesday: Noon to 8:00 pm

Fort Bragg City Hall  
Planning Counter  
416 N. Franklin Street  
Fort Bragg, CA 95437  
(707) 961-2823  
Monday through Friday: 9:00 am to 5:00 pm

### *Administrative Record*

Department of Toxic Substances Control  
700 Heinz Avenue  
Berkeley, CA 94710-2721  
(510) 540-3800 (please call for an appointment)  
Monday through Friday: 8:00 am to 5:00 pm

Site documents are also available at DTSC Envirostor Database [www.envirostor.dtsc.ca.gov](http://www.envirostor.dtsc.ca.gov). A computer is available in the DTSC file room for your use.

## Who to Contact for Information

We appreciate hearing from the community and welcome your questions and concerns. If more information or questions regarding this fact sheet, the draft RAP for OU-A, or the Georgia-Pacific Mill Site overall, please contact:

Edgardo Gillera  
DTSC Project Manager  
(510) 540-3826  
(510) 540-3819 fax  
[EGillera@dtsc.ca.gov](mailto:EGillera@dtsc.ca.gov)

### *Public Participation Inquires:*

Ms. Joyce Whiten  
Public Participation Supervisor  
Public Participation Branch  
(916) 255-6684  
1-866-495-5651 toll free  
[JWhiten@dtsc.ca.gov](mailto:JWhiten@dtsc.ca.gov)

### *Media Inquiries:*

Ms. Jeanne Garcia  
DTSC Public Information Officer  
(818) 771-6573  
[JGarcia1@dtsc.ca.gov](mailto:JGarcia1@dtsc.ca.gov)

## NOTICE TO HEARING-IMPAIRED INDIVIDUALS

You can obtain additional information about the site by using the California State Relay Service at 1 (888) 877 5378 (TDD). Ask them to contact Joyce Whiten at (916) 255-6684 regarding the Georgia-Pacific, Fort Bragg Mill Site project.

## ANNUNCIO

Si prefiere hablar con alguien en español acerca de esta información, favor de llamar a Jacinto Soto, Departamento de Control de Sustancias Tóxicas. El número de teléfono es 510-540-3842.



**W15b**

A-1-FTB-05-053-A6  
Fort Bragg City Council  
& Redevelopment Agency  
IN FAVOR

## CITY OF FORT BRAGG

*Incorporated August 5, 1889*  
416 N. Franklin St.  
Fort Bragg, CA 95437  
Phone: (707) 961-2823  
Fax: (707) 961-2802  
<http://city.fortbragg.com>

February 2, 2009

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

**SUBJECT: Coastal Permit Amendment for Remediation of Fort Bragg Coastal Trail & Parkland Area (Georgia Pacific Corporation; A-1-FTB-05-053-A6)**

Honorable Chair Neeley and Members of the Coastal Commission:

We urge you to approve coastal permit amendment A-1-FTB-05-053-A6, as recommended by your staff. The permit will allow Georgia-Pacific Corporation to remove dioxin-contaminated soils from the "coastal trail & parkland area" that the City is acquiring and to safely contain the soil in an engineered "consolidation cell" that has been approved by the State Department of Toxic Substances Control (DTSC), the North Coast Regional Water Quality Control Board (WQCB), and the Fort Bragg Redevelopment Agency Board.

For the past five years, the City and the State Coastal Conservancy have been working to acquire approximately 75 acres of coastal property from Georgia-Pacific that will provide public access to 3.5 miles of spectacular coastline that has been off-limits for over a century. By concluding this purchase in advance and independent of the future development plans for the remainder of the 425+ acre former mill site, we can ensure that this very significant piece of the California coast will be accessible to residents, visitors and future generations regardless of market factors and future planning processes and entitlement negotiations. We are thrilled to be able to create a magnificent scenic and recreational amenity that will help encourage redevelopment of the remainder of the mill site and serve as an economic engine for Fort Bragg and surrounding communities on the Mendocino coast.

The purchase transaction cannot occur until the clean-up is completed and, in fact, the grant funding for the acquisition will be jeopardized if clean-up is delayed. We appreciate the work of Coastal Commission staff, as well as staff at DTSC, WQCB, State Department of Fish and Game, National Marine Fisheries Service, and U.S. Fish and Wildlife Service in performing detailed technical review of Georgia-Pacific's site investigation, characterization, and remedial action plan and feasibility study for the proposed parkland property. These technical experts, along with the City's environmental consultant and toxicologist, have met on a monthly basis for more than two years to review data, reports and technical recommendations for the Mill Site clean-up. The technical review by these experts has concluded that the proposed Operable Unit A Remedial Action Plan is protective of both environmental and human health.

The City Council, acting in its capacity as the Fort Bragg Redevelopment Agency (the "Agency") held eight public meetings between October 2007 and August 2008 to review and discuss the site investigation and clean-up plans for the coastal trail and parkland property. DTSC staff attended several of these meetings and held several other meetings in our community. In August 2008, the Agency, acting within its authority under the Polanco Redevelopment Act, unanimously approved the Operable Unit A Remedial Action Plan.

**W15b**

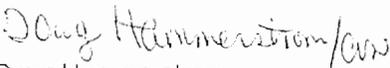
A-1-FTB-05-053-A6  
Fort Bragg City Council  
& Redevelopment Agency  
IN FAVOR

The Agency supports on-site consolidation and capping of soils which are minimally impacted with dioxins/furans. Given the low concentration of dioxins in the soil of the coastal trail, we believe that this alternative is more environmentally sound and socially responsible than digging and hauling the material to be disposed of in a landfill in another community. Not only does the capping eliminate hundreds of lengthy truck trips over very windy, narrow roadways, thereby reducing greenhouse gas emissions and the risks inherent to the transport of toxic materials, but it also retains the material in our community instead of placing it in someone else's "back yard." We are confident that the consolidation cell will be appropriately monitored and managed over time. We are also supportive of the opportunity that this provides for the possible future bioremediation of these dioxin-impacted soils, should myco-remediation or an alternative technology become available.

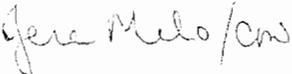
It is important to note that Fort Bragg Redevelopment Agency members have also made it clear that, while we support a capped area for contaminated soils from the coastal trail and parkland area, (which have relatively low concentrations of dioxins), we do not view this as precedent-setting for consolidation and capping of contaminants from elsewhere on the mill site. If consolidation and capping is proposed in future Remedial Action Plans, such actions would be evaluated on a case-by-case basis.

Fort Bragg Vice Mayor Dave Turner, City Manager Linda Ruffing, and environmental consultant Glenn Young will be present at the February 4<sup>th</sup> hearing and available to respond to any questions you may have. Again, we encourage the Commission to approve the coastal permit amendment as recommended by staff. Thank you very much for your consideration of this matter.

Sincerely,

  
Doug Hammerstrom  
Mayor

  
Dave Turner  
Vice-Mayor

  
Jere Melo  
Councilmember

  
Dan Gjerde  
Councilmember

  
Meg Courtney  
Councilmember

Cc: City Manager  
City Attorney  
City Clerk  
Glenn Young, Fugro West  
Bob Merrill, California Coastal Commission  
Barbara Cook and Denise Tsuji, DTSC  
Karyn Gear and Matt Gerhart, State Coastal Conservancy  
Chip Hilarides, Georgia-Pacific



FUGRO WEST, INC.

1000 Broadway, Suite 440  
Oakland, California 94607  
Tel: (510) 268-0461  
Fax: (510) 268-0545

February 2, 2009  
Project No. 1740.001

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

Subject: Georgia Pacific Mill Site Permit No. A-1-FTB-05-053-A6  
**(Wednesday, February 4<sup>th</sup> Agenda Item: W15b)**

Dear Commissioners:

I am writing this letter in support of amending Georgia Pacific's Coastal Permit to allow implementation of remedial action for operable unit A (OU-A) on the Georgia Pacific Mill Site in Fort Bragg. Fugro West Inc. has been providing peer review and environmental consultation services to the City of Fort Bragg throughout the very extensive site characterization, feasibility study, and evaluation of remedial options for OU-A and other portions of the former Mill Site. Based on my personal experience on this project and many others within the State of California, it is my professional judgment that excavation and consolidation of contaminated soil described in the Remedial Action Plan (RAP) for OU-A is an appropriate solution for managing the contaminated soil that is both protective of human health and the environment as well as technically and fiscally responsible.

CalEPA's Department of Toxic Substances Control (DTSC) is providing regulatory oversight throughout the site investigation, monitoring, and remediation at the Mill Site. The DTSC is coordinating its oversight efforts with a number of other regulatory agencies, including but not limited to the North Coast Regional Water Quality Control Board, the Mendocino Air Quality Management District, and natural resources trustees that include California Department of Fish and Game (CDFG), the US Fish and Wildlife Service, National Atmospheric and Oceanic Administration (NOAA), and the Coastal Commission. Investigation and regulatory oversight to date have been extensive and thorough. In fact, DTSC and Georgia Pacific hold monthly meetings with the various regulatory and resource agencies to ensure timely sharing of findings, and to receive input and feedback regarding the ongoing remedial investigation.

Investigation of OU-A was conducted in 2007. Results of the investigation identified roughly 14,000 cubic yards of soil within OU-A that contain elevated concentrations of lead, polychlorinated biphenyls (PCBs), and dioxin that require remediation. Georgia Pacific's Remedial Action Plan, approved by DTSC in August 2008, recommends excavation and disposal of the soils containing lead and PCBs at an offsite landfill, and excavation, consolidation, and capping of dioxin-impacted soil into a buried, lined cell in the central area of the Mill Site. The consolidation cell will be located over 1,000 feet from the coastal bluffs in a relatively flat portion of the Site, will be engineered to meet Water Board requirements, and will remain the responsibility of Georgia Pacific.



It is important to note that the selection of the remedial action was consistent with State and Federal guidance that includes evaluation of several alternatives against nine decision criteria established by the USEPA, including protection of human health and the environment; compliance with applicable or relevant and appropriate requirements; reduction of toxicity, mobility, and volume; cost; short and long-term effectiveness; implementability; and State and community acceptance. DTSC conducted community outreach and managed the technical review of the remedial alternatives to ensure that the nine decision criteria were adequately addressed.

During the December 2008, California Coastal Commission meeting in San Francisco, several Commissioners expressed concern regarding dioxin and the effectiveness of the proposed remedy. Please note that the proposed remedy is for relatively low concentrations of dioxin in soil, and no liquids will be placed into the cell. Furthermore, the dioxin in that soil is highly immobile and will generate no liquids. The cell will be completed above the groundwater table. The liner and cap system proposed for the cell provide a physical barrier to prevent contact with rainfall and will prevent accessibility by rodents and the general public. Lastly, the proposed remedy will also require placing a deed restriction on the property that will include provisions for annual inspection and reporting to the DTSC to ensure that the cell is intact and functioning as designed.

Georgia Pacific's investigation and Remedial Action Plan for OU-A have been complete and thorough. DTSC has been diligent in addressing community concerns as well as those of other regulatory agencies. In my opinion, the selected remedy for the onsite consolidation, capping, and operation and maintenance of the impacted soil is protective of human health and the environment, and is consistent with my professional experience. Therefore, I recommend that the California Coastal Commission approve the permit amendment. I look forward to seeing the Coastal Trail along the bluffs at Fort Bragg.

Sincerely,

FUGRO WEST, INC.



Glenn S. Young, P.G.  
Manager, Environmental Services

GSY:rh

Copies Submitted: (1) Addressees  
(1) Linda Ruffing, City of Fort Bragg

# Rhoda Teplow Presents

RECEIVED

JAN 30 2009

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

CALIFORNIA  
COASTAL COMMISSION

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

Item No: W15b OPPOSED

Jan. 27, 2009

Dear Staff,

I am strongly opposed to capping the toxic waste at the old Georgia Pacific site in Fort Bragg for two clear reasons.

The first reason is that we don't know exactly what all the chemicals are that were left from the mill site, and we don't know how long they will last under the cement cap, nor do we know the affects if they were to escape over many years.

The second reason is that I would much rather have the toxins eaten up by mushrooms which in the long run will not hurt us. The mushroom testing needs more time. The mill took years to accumulate so many waste toxins; therefore, we too must spend more time on scientific research to find out a more natural and inventive solution to our community's problem.

We have suffered 8 years under a federal administration that opposed science of all kinds. Let's stop and slow down and together search for a more scientific answer to our waste problem.

I am writing to you today because I don't want to leave a toxic mess under a bit of cement for my kids on the Mendocino Coast.

Signature on File

Rhoda Teplow

email ▶ [rteplow@mcn.org](mailto:rteplow@mcn.org)  
PHONE/FAX ▶ 707 ♦ 964 ▼ ARTS (2787)  
POST OFFICE BOX 453 ▼ MENDOCINO, CA 95460

**FORM FOR DISCLOSURE  
OF EX PARTE  
COMMUNICATION**

Date and time of communication:  
(For messages sent to a Commissioner by mail or facsimile or received as a telephone or other message, date time of receipt should be indicated.)

January 28, 2009, 10:30 a.m.

Location of communication:  
(For communications sent by mail or facsimile, or received as a telephone or other message, indicate the means of transmission.)

Phone Call

Person(s) initiating communication:

Maggy Herbelin, ORCA Representative

Person(s) receiving communication:

Bonnie Neely

Name or description of project:

Agenda Item W15b. – Georgia-Pacific Corp  
Permit, Fort Bragg, Mendocino County

Detailed substantive description of content of communication:

(If communication included written material, attach a copy of the complete text of the written material.)

Ms Herbelin states that as this permit allows contaminated soil to be placed in a mound, ORCA suggests that the mound be shaped attractively rather than an unattractive eyesore like some brown-fields are.

Date: January 28, 2009

  
Signature of Commissioner

If the communication was provided at the same time to staff as it was provided to a Commissioner, the communication is not ex parte and this form does not need to be filled out.

If communication occurred seven or more days in advance of the Commission hearing on the item that was the subject of the communication, complete this form and transmit it to the Executive Director within seven days of the communication. If it is reasonable to believe that the completed form will not arrive by U.S. mail at the Commission's main office prior to the commencement of the meeting, other means of delivery should be used, such as facsimile, overnight mail, or personal delivery by the Commissioner to the Executive Director at the meeting prior to the time that the hearing on the matter commences.

If communication occurred within seven days of the hearing, complete this form, provide the information orally on the record of the proceedings and provide the Executive Director with a copy of any written material that was part of the communication.

Coastal Commission Fax: 415 904-5400

RECEIVED

**FORM FOR DISCLOSURE  
OF EX PARTE  
COMMUNICATION**

Date and time of communication: January 16, 2009, 10:00 am.  
(For messages sent to a Commissioner by mail or facsimile or received as a telephone or other message, date and time of receipt should be indicated.)

Location of communication: Conference Call  
(For communications sent by mail or facsimile, or received as a telephone or other message, indicate the means of transmission.)

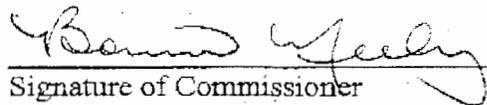
Person(s) initiating communication: Chip Hilarides, Project Manager for Georgia Pacific

Person(s) receiving communication: Bonnie Neely

Name or description of project: W15b. Georgia Pacific, Fort Bragg Permit A-1-FTB-05-53-AG

Detailed substantive description of content of communication: (If communication included written material, attach a copy of the complete text of the written material.)

Mr. Hilarides indicated that he agrees with the additional conditions proposed by staff and that he will have a power point presentation for the Commission at the February Hearing. He also advised me that representatives from the State will be in attendance to answer Commissioner questions regarding the toxic clean-up plan.



Date: February 2, 2009

Signature of Commissioner

If the communication was provided at the same time to staff as it was provided to a Commissioner, the communication is not ex parte and this form does not need to be filled out.

If communication occurred seven or more days in advance of the Commission hearing on the item that was the subject of the communication, complete this form and transmit it to the Executive Director within seven days of the communication. If it is reasonable to believe that the completed form will not arrive by U.S. mail at the Commission's main office prior to the commencement of the meeting, other means of delivery should be used, such as facsimile, overnight mail, or personal delivery by the Commissioner to the Executive Director at the meeting prior to the time that the hearing on the matter commences.

If communication occurred within seven days of the hearing, complete this form, provide the information orally on the record of the proceedings and provide the Executive Director with a copy of any written material that was part of the communication.

Coastal Commission Fax: 415 904-5400