

**CALIFORNIA COASTAL COMMISSION**

NORTH COAST DISTRICT OFFICE  
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**W12a**

**1-23-0353**

**(MCSD)**

**December 7, 2023**

**CORRESPONDENCE**



Dec. 6, 2023

Ms. Amber Leavitt  
California Coastal Commission  
North Coast District Office  
1385 8th Street #130  
Arcata, CA 95521  
[amber.leavitt@coastal.ca.gov](mailto:amber.leavitt@coastal.ca.gov)  
*Sent via email*

Re: Comments on Staff Report, Manila Drainage Maintenance (Humboldt Co.);  
Application No. 1-23-0353; Agenda item w12a-12-2023

Ms. Leavitt,

I am writing on behalf of Humboldt Waterkeeper, which works to safeguard coastal resources for the health, enjoyment, and economic strength of the Humboldt Bay community through education, scientific research, and enforcement of laws to fight pollution.

These comments are in response to the Staff Report for the Manila Drainage Maintenance CDP dated Nov. 6, 2023. We generally support the project, which proposes maintenance and enhancement of existing drainage features, including clearing out and creating new bioswales, replacing and adding new culverts, and installing valley gutters and rain gardens to reduce chronic stormwater flooding. In addition, new bioswales also would be graded in some areas to connect with and enhance the capacity of the existing drainage system.

We have concerns regarding the potential for legacy contamination from the former lumber mill that operated on the site of the Manila Community Park (APN 400-051-001) from 1946 to 1956. The mill operated during the era in which the fungicide pentachlorophenol (PCP) was used to treat lumber. This chemical contained dioxins and furans, some of the most persistent and most toxic compounds ever manufactured.



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Humboldt Bay is designated the 303(d) list as Impaired by dioxins and furans, as well as PCBs, another suite of persistent toxic chemicals that were used in lumber mills. At the time this mill was in operation, these chemicals were used freely and carelessly due to the lack of understanding of their toxicity to aquatic life. When they accumulate in aquatic habitats, they magnify in higher trophic levels, impacting human health and wildlife. Marine mammals, raptors, and other piscivorous wildlife are particularly at risk from exposure to dioxins and furans left behind by industrial facilities built on top of former tidal wetlands and other low-lying sites around Humboldt Bay.

To the best of our knowledge, the site of this lumber mill has never been assessed for contamination in soil or groundwater. The grading, culvert replacement, and other ground disturbance that is proposed in Bioswale IV-7 between Mill Street and Humboldt Bay (Figure 3-2, page 2 of Exhibit 2) has the potential to remobilize contamination, especially given that the bioswale is designed to discharge into Humboldt Bay. To avoid these potential unintended impacts to the Environmentally Sensitive Habitat, we recommend the following additional Special Conditions:

1. Sediment sampling for dioxins and furans, PCBs, metals, and petroleum hydrocarbons prior to any ground disturbance in the area between Mill Street and Humboldt Bay. We understand that analyzing samples for dioxins and furans is expensive, and therefore recommend that at the very least, composite sampling be conducted as an initial screening method. Concentrations of contaminants should be evaluated using environmental screening levels (ESLs) of significance that could be harmful to Humboldt Bay aquatic life using the San Francisco Regional Water Quality Control Board (SFRWQCB) ESLs for aquatic life (SFRWQCB 2019).
2. If test results reveal that dioxins and furans (measured in TEQs) or other constituents of concern are encountered at ESLs of significance that could be harmful to Humboldt Bay aquatic life, the permittee shall submit an updated Soil and Groundwater Management Plan that provides additional recommendations to mitigate the potential for mobilization of constituents of concern, including removal and disposal of contaminated material.

Again, we generally support the project overall, which aims to reduce flooding and improve water quality. Please feel free to contact me if I can help clarify our concerns or provide additional information.

Thank you for your consideration.

Sincerely,



Jennifer Kalt, Executive Director  
[jkalt@humboldtwaterkeeper.org](mailto:jkalt@humboldtwaterkeeper.org)

**From:** [NorthCoast@Coastal](mailto:NorthCoast@Coastal)  
**To:** [Leavitt, Amber@Coastal](mailto:Leavitt.Amber@Coastal)  
**Cc:** [Krygsman, Vail@Coastal](mailto:Krygsman,Vail@Coastal)  
**Subject:** FW: app# 1-23-0353  
**Date:** Tuesday, December 5, 2023 10:49:25 AM

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**From:** kris wymer <kristinarna@yahoo.com>  
**Sent:** Tuesday, December 5, 2023 10:37 AM  
**To:** NorthCoast@Coastal <NorthCoast@coastal.ca.gov>  
**Subject:** app# 1-23-0353

re: Manila drainage agenda Dec.12,2023 item W12a

from: Kris Wymer  
2294 Peninsula Dr.  
Arcata, CA 95521  
707-443-0289  
[kristinarna@yahoo.com](mailto:kristinarna@yahoo.com)

As a long time Manila resident and homeowner (since 1985) I have seen the ravages of our failed culvert infrastructure and the need for this plan. When I bought my home, there was adequate drainage for all of my property, no water lingering under the house even during very rainy seasons. Now, tradespeople will not work on my home due to constant water around and under the house, they simply refuse to deal with it. This is dangerous and destructive.

Water ponding on roads causes traffic to swerve into the oncoming lane, creates enormous potholes, and hazardous conditions. The county does not fill the potholes or work to maintain ditches and culverts, the county just turns their collective back.

Significant preparation has already been done and there is a grant in place. Please let's move forward on this.

Thank-you, Kris Wymer

**From:** [Jacques Beaupre](#)  
**To:** [NorthCoast@Coastal](mailto:NorthCoast@Coastal)  
**Subject:** W12a Application No.: 1-23-0353  
**Date:** Thursday, December 7, 2023 9:04:44 AM

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Dear California Coastal Commission,

This is a well thought out plan for a much needed and overdue drainage infrastructure rebuild of Manila, CA.. The work when completed should give relief from year round flooding in the neighborhoods of this coastal community. I hope you follow your North Coast Staff's hard work and recommendation for approval.

The many hours of work to get this Manila Drainage Maintenance plan to this day of approval will be so beneficial to the Community of Manila it can not be overstated. Please approve this plan.

Thank you,

Jacques Beaupre  
P O Box 1177  
Trinidad, CA 95570