

REC'D NOV 22 2017

October 22, 2017

Fort Bragg City Council
416 North Franklin St.
Fort Bragg, CA 95437

Re: G-P Mill site cleanup

To the Honorable members of the Fort Bragg City Council:

I'm writing to share with you the email I sent to DTSC (8-11-17) regarding the cleanup requirements for Pond 8. I hope you can take a few minutes to read my email as you consider your upcoming decision.

Most importantly I hope you agree with me, along with many others in our community, that a full and thorough cleanup of Pond 8 is the responsible, timely and right mitigation to require.

Thank you and have a Happy Thanksgiving,



Mike Thomas

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(707) 961-6261

From: **Mike Thomas** mikethomas@mcn.org
Subject: Georgia-Pacific Mill site cleanup
Date: August 11, 2017 at 4:39 PM
To: TLanphar@dfsc.ca.gov
Cc: Noyo Headlands Unified Design Group nhudg@mcn.org

Dear Mr. Lanphar,

I appreciated the handouts and presentation you and your colleagues gave on August 1st regarding the cleanup effort at the G-P property. I'm writing because I had to leave the meeting early and did not have an opportunity to express my concerns. I'm confident your findings are accurate and that the recommended level of treatment for Pond 8 is consistent with the policies of your department. However, I do not feel the proposed level of remediation for Pond 8 adequately addresses some of the less quantifiable needs of Fort Bragg. I'm hopeful the points I raise below will help you justify amending your final recommendation to be that of requiring the expeditious and total removal of all toxins. Partial cleanup of Pond 8 is not acceptable.

•**BACKGROUND** Since the earliest community meetings many years ago regarding a Specific Plan for the mill site, a thorough site cleanup to repair decades of industrial contamination throughout the property was, and still is, considered by many to be a "given," a logical step in repairing the land to protect our health and to enhance the image of our town and our local economy. Regardless of the wide variety of possible uses that may come to fruition on the property, as a retired land use planner and resident, I believe, as do many others who participated in this planning effort, that a full and thorough cleanup and restoration of this former industrial property, particularly Pond 8, is an opportunity to permanently eliminate a serious health treat and simultaneously provide a boost to our community image that shouldn't be squandered.

•**HEALTH AND SAFETY** I share the same concerns voiced by others with regard to the pond's proximity to known faults and relatively low height above sea level. A tsunami, an earthquake, or flooding and erosion caused by an extreme weather ("atmospheric river") event are current threats known to be capable of causing the partial or complete failure of retention structures, resulting in a rapid release of toxins that will require immediate cleanup. Ongoing and projected sea level rise and associated tidal action, in the long term, will not reduce that threat. The full and thorough toxin-free cleanup of Pond 8 needs to happen now while work on the mill property is ongoing.

Also to consider: a slow and undetected breach of a containment structure caused by soil conditions, poor design and construction, or inadequate monitoring and maintenance, would threaten the health and safety of locals and visitors, as well as the proximate land and marine ecosystems. Once access to the previously inaccessible pond becomes possible with the completion of the coast trail, local kids and their dogs will probably be the first "explorers" to venture off the trail and get a little wet and dirty. Reducing the risk of exposure by restricting pond access with fences and health warnings probably won't stop the kids but will give visitors and locals a lasting reminder of the toxic health threat lingering below the surface. This will be one of the few negative talking points people will undoubtedly have to share about the coast trail...and it could be easily remedied.

•**COMMUNITY IMAGE** As a hard-to-reach rural community faced with challenging economic realities, our ability to protect and enhance people's perception of Fort Bragg as a desirable place to visit, live, or start a business remains heavily dependent on our ability to develop, maintain, and market our local amenities. The perception of our community should not be that of a coastal town trying to rejuvenate itself with a nice trail, marine science center, and—oh by the way—a toxic dump buried in the middle.

Instead, and with much community input, the perception we could be nurturing now is as a healthy coastal town in the process of being economically and visually rejuvenated by transforming a polluted industrial site into a thoughtfully planned, toxin-free, state-of-the-art example of habitat restoration....well worth boasting about. Failure to fully remediate all toxins would eliminate what could otherwise be a valuable health-related talking point for marketing purposes. Furthermore, the remediation process to remove deadly hazardous materials and the restoration of the area to its near-natural native condition would be of interest to visitors as well as students and restoration professionals.

Our coastal trail and the Noyo Marine Science Center, now and in the future, are two more examples of marketable recreational and educational amenities on the mill property that will continue to attract visitors and locals alike. The vision and goal to develop the Marine Science Center as a world class research and learning facility also says much about our community values for increased local educational opportunities and to provide a venue for the public to gain a better understanding of the ocean.

The final level of cleanup that the state and community leaders require will reflect on them and have a lasting effect on Fort Bragg. The short-sighted approach of leaving Pond 8 as is, toxins capped in place, will fall short of alleviating the health risk. Further, expenses associated with taking on the long-term maintenance, monitoring, and repairs of a containment structure would also become a permanent expense for the City, not to mention the cost that would be incurred in the event of a natural disaster. Allowing a known deadly toxin to remain buried in a pond in the midst of what can and should be a world-class restoration project makes no sense. As a community, we just cannot accept being left with a toxic health and safety hazard anywhere on the mill site property.

Thank you,

Mike Thomas