



April 1, 2022

Ms. Donne Brownsey, Chair
California Coastal Commission
455 Market Street, Suite 300
San Francisco, CA 94105

Re: Support for Staff Recommendations, Humboldt Bay Trail South, Th17a-4-2022

Chair Brownsey,

On behalf of Humboldt Baykeeper, I am writing in support of the staff recommendations for the Humboldt Bay Trail South (Th17a-4-2022; CDP 1-20-0560). Humboldt Baykeeper was launched in 2004 with a mission 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. This project addresses one of our top priorities: protecting and expanding public access to the coast. It does so while protecting water quality and habitat from contamination on a former industrial site adjacent to Humboldt Bay.

The Humboldt Bay Trail South is a critical public access project that will complete the “Final Four” miles of a 22-mile section of the California Coastal Trail stretching from the Elk River in Eureka to Little River State Beach in McKinleyville. The completion of this trail will realize a dream that countless residents have worked toward for decades. The project also fulfills Condition 1, Coastal Trail Planning, of the Commission’s 2013 Consistency Certification for the Eureka-Arcata Route 101 Corridor Improvement Project.ⁱ

We greatly appreciate the diligence of Coastal Commission staff as well as the applicant’s efforts to modify the project plans to protect the environment and to keep construction workers safe from dioxins and other contaminants that were detected in environmental assessments of the site. We strongly support adherence to the environmental screening level for dioxins of 4.8 ppt adopted by the San Francisco Bay Regional Water Quality Control Board as described in the staff report.

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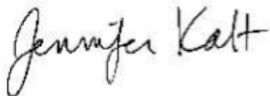
Using the environmental screening levels is critical because Humboldt Bay is designated as “Impaired” by dioxins and furans by the State Water Resources Control Board under authority of Section 303(d) of the Clean Water Act. Projects involving ground disturbance in or near lumber mills that were in operation between the 1940s and 1980s have the potential to mobilize dioxin contamination. Dioxins are extremely toxic, long-lasting compounds that can cause cancer and reproductive harm. In the Humboldt Bay area, the primary source of dioxins is pentachlorophenol, a wood preservative that was used to treat lumber.

We would like to emphasize our support for the following conditions of approval that were developed to protect Humboldt Bay from dioxins, which have the potential to be remobilized without careful handling and disposal of contamination soils:

- **Condition 15. Final Soil and Groundwater Management Plan**, which will ensure that soil disturbance during project activities will not mobilize contaminants into Humboldt Bay.
- **Condition 16. Final Construction Stockpiling and Debris Disposal Plan**, which requires stockpiling of debris and sediment at least 50 feet from coastal waters and drainages; BMPs to prevent any discharge of pollutants to surrounding coastal waters and wetlands; and proper disposal of contaminated soil and materials at an authorized hazardous waste facility.

Thank you for your work to enhance coastal access for all while protecting our precious coastal resources.

Sincerely,



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Cc:

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¹ California Coastal Commission (2013). Revised Findings on Consistency Certification, CC-016-13 (CalTrans). <https://documents.coastal.ca.gov/reports/2013/11/Th14a-11-2013.pdf>