

4-23-08 Citizen Coordinating Council Meeting

Avista Utilities, 6:30 PM to 9:00 PM, Kellogg, Idaho

Attendees

Brock Baker
Jerry Boyd
Julie Dalsaso
Jeri DeLange
Bonnie Douglas
Terry Harwood

Andy Mork
W.C. Rust
Rusty Sheppard
John Snider
Rebecca Stevens

Meeting Overview

The April 23, 2008 meeting of the Citizen Coordinating Council (CCC) of the Basin Environmental Improvement Project Commission (BEIPC) covered the following topics:

1. BEIPC Updates
2. Lower Basin/Lake Coeur d'Alene Activity Update
3. Repository PFT Update
4. Communications PFT Update and Discussion
5. Lake Coeur d'Alene Piling Removal

CCC Chair John Snider chaired the meeting.

BEIPC Updates

BEIPC Executive Director Terry Harwood provided updates on infrastructure work, Clean Water Act projects, and yard cleanups.

Infrastructure Work

Terry provided a progress update on the work to inventory infrastructure that plays a role in protecting Basin cleanup remedies. He said that all drainage analyses are complete and that copies of drainage reports are available at the BEIPC Executive Director's office. Terry offered that drainage issues have caused problems for remediated right-of-ways, in some cases scouring out all new sod and gravel down to plastic barriers covering contaminated material.

Terry clarified that CERCLA funds can only be spent on infrastructure work if it protects the remedy. The Record of Decision (ROD) specifies \$3.5 million for such work. Terry said that EPA will use the drainage analyses as input into decisions about mine and mill site cleanup priorities. The reports will also be incorporated into the *Drainage Control and Infrastructure Revitalization Plan*.

Terry said that the next step on infrastructure will be to talk to Basin communities about prioritizing infrastructure projects and spending. He has requested \$50,000 from EPA for a project in Mullan to install a paved swale to control runoff and protect remediated areas.

Clean Water Act Report-outs at BEIPC Meeting

Terry provided an update on Clean Water Act (CWA) projects, and handed out a specific accounting of sub-grant projects and spending. He said that all Year 1 CWA projects are complete and Year 2 projects are nearly complete. Approximately \$500,000 worth of work remains for Year 3 CWA projects.

Terry handed out a list of CWA project reports that are available in the BEIPC Executive Director's office. He said that there is an effort to put all CWA project summaries on the Basin Commission website.

Flood Control Study

Terry described an effort he has been working on with Senator Craig's office to obtain funding for flood control infrastructure in the Basin. He handed out a document "Upper Coeur d'Alene River Basin Framework for a Flood Control Program," which outlines a flood management program for the Upper Basin (roughly from Exit 39 to the headwaters). The effort analyzes the condition of levies and identifies where they need to be fixed or replaced.

Terry recalled that FEMA recently developed new flood maps for the Basin that significantly expanded the 100 year flood zone. In putting together the maps, FEMA assumed that all existing levies would fail. He said the maps have implications for residents who would have to buy flood insurance under some federal mortgage programs. Once the levy analysis is done, it may lead FEMA to reassess the flood maps, presumably reducing the 100 year flood area.

Terry said that he had a letter from EPA saying that homeowners would not have to pay to re-remediate yards in the event of a flood. This policy would apply as long as the homeowner had his or her yard tested and cleaned up (if indicated by testing) and complied with the Institutional Controls Program.

Terry noted that any flood work involving the Army Corps of Engineers would have to receive matching funds from counties or communities. Rebecca Stevens, Coeur d'Alene Tribe asked whether some matching funds could be "in kind." Terry said that some could be in kind, but due to the magnitude of funding involved much would have to come from direct matching funds.

Jerry Boyd asked whether FEMA's attention to flooding in the area was related to Hurricane Katrina. Terry replied that, since Katrina, FEMA is reluctant to help communities that haven't maintained their own flood control infrastructure.

Yard Cleanup Update

Terry presented information developed by Mark Stromberg, Idaho DEQ about the yard cleanup program and 2008 plans. Highlights included:

- 4,969 yards have been completed to date
- 543 yards were done in 2007 (55,000 cubic yards were placed in the Big Creek Repository)
- The 2008 season will get a late start due to lingering snow; rising fuel costs also mean that fewer yards will get cleaned up for the available budget

In response to a picture of truck decontamination at the Big Creek Repository, CCC member Julie Dalsaso asked how runoff water was managed. Terry said there were collection and treatment systems for all decontamination facilities. He noted that a similar decontamination facility would be constructed at East Mission Flats.

Lower Basin/Lake Coeur d'Alene Activity Update

Rebecca Stevens, Coeur d'Alene Tribe provided an update on the Lower Basin Project Focus Team (PFT), an overview of the Coeur d'Alene Lake Model, and a description of the status and schedule for the Lake Management Plan.

Lower Basin PFT Update

Rebecca said that the Lower Basin PFT was formed to combine the work of previous PFTs working on bank stabilization, Lake monitoring, and other Lower Basin issues. She described the first PFT meeting (and handed out meeting notes). The meeting was mainly an update on current projects including,

- The Basin Environmental Monitoring Plan (Anne Dailey, EPA)
- Coeur d'Alene River bank stabilization (Mark Addy, Natural Resources Conservation Service, U.S. Department of Agriculture)
- Coeur d'Alene Lake sampling update (Glen Rothrock, DEQ)
- Fish response to bank stabilization (Brian Spears, U.S. Fish and Wildlife Service)
- Coeur d'Alene River Bank Stabilization (Nick Zilka, DEQ)
- Lane Marsh character sampling (Anne Dailey, EPA)

Rebecca said that the PFT will work on making project reports and summaries more broadly available to encourage coordination among agencies. The group was also thinking about future projects that would be part of the ecological remedy for the Basin. Terry said that having specific project ideas in the pipeline was vital to seeking future funding for ecological remedies.

Julie Dalsaso asked whether the geographic scope of the PFT was the main stem downstream of Cataldo to the outlet at Harrison. Rebecca said that was the scope, but that the PFT was still going to want to coordinate and communicate with lake monitoring and LMP projects.

Andy Mork asked for clarification on the Natural Resources Conservation Service (NRCS) projects. Rebecca said that these were stream bank stabilization efforts focused on using natural stabilization techniques, such as sandy shorelines and graded banks. Andy said that it would be helpful to have more information on these types of ecological projects—both to track what is going on and to share ideas on possible approaches.

CCC members discussed efforts to maintain stabilization projects over time, including keeping cattle away from remedies and whether or not to vegetate stabilization areas or levies.

Jerry Boyd raised the issue of boat wakes and streambank erosion. CCC member Bill Rust said that most erosion is from boats, but the amount of erosion pales in comparison to what is being carried down the river from contaminated areas upriver. Rebecca Stevens noted that Idaho boating laws say that most of the river is a “no wake zone.” A Kootenai County official involved with enforcing the boating rules is invited to come to the next Lower Basin PFT meeting.

Lake Model Overview

Rebecca provided an overview of the Lake Model (ELCOM/CAEDYM model) written by Dale Chess. The model mathematically estimates the physical parameters (temperature, water currents, seasonality) for 250 meter by 250 meter “cells” throughout the lake from lake surface to lake bottom.

Rebecca said that the model is one of the tools being used to formulate the Lake Management Plan. There is currently an effort to validate model results using river and weather data sets from 2004 to 2007 as model inputs and then to compare the results with monitoring data from the lake during that period. Rebecca and Terry noted that there is also an effort to get more relevant weather data by installing weather stations on the lake. Andy said that the model would be useful for identifying crucial thresholds for limiting constituents (e.g., phosphorous) in the lake. Bill Rust said that the simulations run on the model to date looked pretty good. He said that the model’s geochemistry should include pyromorphite, which is a sink for both lead and phosphate. Rebecca said she would ask Dale Chess if pyromorphite was incorporated into the model.

Lake Management Plan Path Forward

Rebecca said the draft Lake Management Plan (LMP) is currently being reviewed by DEQ technical staff in Boise. Following revisions based on this review, a draft will be made available for the Basin Commission Board, the CCC, the Technical Leadership Group (TLG), and other stakeholders. The draft is expected to be released before the May 14 BEIPC board meeting. There will be an in-depth public review.

Julie Dalsaso said that there was a public comment period for the NPDES permits for the City of Coeur d’Alene and Post Falls. Rebecca said she thought these permits had gone

through such a review a few years ago. Julie and Rebecca agreed to follow up after the meeting to discuss what was happening with these permits. Terry said that he and Rusty had worked on information for the hazards section of one of the area's comprehensive plans.

Repository PFT Update

Andy Mork provided a number of updates on repository activity in the Basin as part of an update on the Repository Project Focus Team (PFT). He began with a description of the Basin waste management strategy, which describes the general areas, timing, and volume of repository needs in the Basin.¹ Andy noted that the Record of Decision (ROD) for the Basin requires disposal of contaminated soil in a repository.

Andy said that soil waste is currently being generated by the yard cleanup program (50,000 to 70,000 cubic yards per year) and the Institutional Controls (ICP) program. He said that ecological cleanup will generate a large additional waste stream in 5 or more years. In the near term (0-5 years), there is a need for around 800,000 cubic yards of repository capacity. In the longer term (5-25), the need rises to 5.6 million cubic yards. Much of the increase is due to anticipated ecological remedy work.

John Snider asked where the ecological remedy waste would come from, and Andy responded that it would come from dredged sediments, direct removal (e.g., in wetland areas), and the like. Terry Harwood added that the ROD described at least 2,400 acres of contaminated wetlands to be dredged. Jerry Boyd asked if any of this ecological remedy work would happen around the Cataldo Mission. Andy said that there is nothing currently planned for the area; the focus is still on the yard cleanup work in the Upper Basin.

Andy also provided a summary of current repository capacity, including the Page repository (Box), Big Creek (Upper Basin), East Mission Flats (Lower Basin), and Mullan (Eastern Upper Basin). Remaining capacity, without footprint expansion at these four sites is 867,500 cubic yards. Andy said that the lead time for finding a new repository is five years—just about the amount of time that existing capacity is expected to be filled up. Big Creek, he said is getting full. (Later, Andy described a potential expansion on the north side of the Big Creek site.) East Mission Flats has enough capacity for yard cleanup and ICP waste, but not waste from the ecological remedy. He emphasized that now is the time to start looking for an additional repository location because there can't be a cleanup without having a place to put the waste.

John Snider asked what the outlook was for finding new repository space. Andy said there are two possibilities currently being considered: Osburn Ponds, and the Burns-Yaak site in Osburn (already owned by EPA). Bonnie Douglas said that there is an Osburn City resolution about not having a repository within the city limits. Andy said that such a resolution would have to be considered, but that it is not the only consideration. He said

¹ For a summary of the strategy and other repository information, see the repository section of the BEIPC website: www.basincommission.com/TLG_PFT_Repository.asp.

that CERCLA doesn't recognize any other primacy. Bill Rust noted that the resolution would have been considered one of the Applicable or Relevant and Appropriate Requirements (ARAR) for a repository in Osburn, but that it could be over-ruled. Beyond the legal requirements, Andy said it is important to get local buy-in for a repository. The last thing anyone wants to do, he said, is deliver a mandate.

Julie Dalsaso asked where waste from cleanup in Washington goes (e.g., Star Road). Terry Harwood says that it gets hauled to a facility in Washington State. Julie also asked whether it was preferable to have a facility at "river level" rather than at a higher elevation where waste could wash down. Andy said that it was not necessarily bad to have a repository at a higher level, and said that some of the Upper Basin mine and mill sites could be considered. Elsewhere, he said eligible sites are in the floodplain (although not in a "flood way"). This flood plain is roughly equivalent to the boundaries of the ICP program.

Andy gave a brief update on the East Mission Flats site. He noted that the State had recently bought property along the access to the repository so that the State owns "everything our wheels will touch." He said that the facility should be open for ICP waste in late April or early May. EPA will review the 60% design report in mid-May and then a 90% design report will be developed. The 90% design report is due in December 2008.

Bonnie Douglas noted that the Page Repository is managed by the Panhandle Health District, and asked whether it is still under the jurisdiction of the Basin Commission. (Note: the Page site is in the Box and never was under the jurisdiction of the BEIPC) Terry Harwood said that Panhandle Health took over management from the mining group cleanup program. Referring to the issue of repository management, Andy said that, for a repository to take ICP waste, it needs to be available to those who would bring waste there (e.g., private construction contractors). At the same time, the site needs to be controlled to avoid improper use (e.g., dumping of construction debris, municipal solid waste, etc.). He said that there is going to be a key card control gate for ICP permit holders that allows them to use the site while also recording their identity and time of use. Key cards will be issued when users get an ICP permit from the Panhandle Health District. There will also be a video camera to see who is using the site and what is in the load.

In response to a previous question from a CCC member, Andy outlined the repository scoping and development process, from 1) initial fact finding to 2) initial evaluation to 3) advanced evaluation to 4) detailed design and environmental evaluation. He noted the points of public comment in these steps. Andy said that one of the difficulties of the East Mission Flats process was confusion about what meetings were public and what meetings were not.

Andy distributed results from recent groundwater monitoring at East Mission Flats and a map showing sampling locations (CCC member Bonnie Douglas had previously asked for a map of the site). Four monitoring wells were sampled twice—once in December

2007 and once in February 2008—and analyzed for antimony, arsenic, cadmium, lead, and zinc. All concentrations were below regulatory thresholds for drinking water. Andy said that the results indicated that the underlying soil layer was stripping out contaminants before they got into deeper groundwater.

Andy said that upcoming analytical work will involve a leach test, in which water will be poured through a column of contaminated material and underlying native silts to see if contaminants make it through the column or are stripped out. Bill Rust noted that contamination could move laterally, citing existing seeps at the Cataldo boat ramp. Andy said the boat ramp was probably a different hydrological regime. Julie Dalsaso referred Andy to seep studies done by Idaho DEQ for the Spokane River (DEQ contact: Gary Stevens).

John Snider suggested that the CCC have Andy's contact information for further questions. It is:

Andy Mork, Mine Waste Program Scientist
State of Idaho Department of Environmental Quality
1410 North Hilton
Boise, Idaho 83706
Phone (208) 373-0141
Fax: (208) 373-0154
Email: Andy.Mork@deq.idaho.gov

Communications PFT Update and Discussion

Jeri DeLange gave an overview of the recent Communications PFT meeting, for which she is the Chair. She noted the following highlights:

- The PFT was established by the BEIPC board in February 2008 and had its first meeting on April 9
- One of the key issues for the PFT is strengthening public involvement, which was strong in the early years of the BEIPC but has tapered off.
- The work of the communications subgroup of the Recreation PFT will be folded into the Communications PFT. This sub-group, chaired by Rebecca Stevens, Coeur d'Alene Tribe, was focusing on making sure community members felt welcomed, using tools such as radio and TV as communication tools, and working with other existing local organizations.
- The PFT established a mission statement: "The Communications PFT is a diverse group formed to strengthen public involvement and address communication-related opportunities within the Coeur d'Alene Watershed." It also established a more specific set of goals:
 - "Create an over-arching communications strategy that can be individualized and tailored for particular groups, projects, etc.
 - Work with the Basin Commission staff on updating and improving the content and interface of the existing web site.

- Expand the existing network and work with entities that have existing communications avenues.
- Generate new communication and information dispersal techniques.
- Organize, identify, and establish sub-teams for specific implementation of goals.”

Terry Harwood noted that any recommendations from the PFT need to go to the TLG before being recommended to the BEIPC board. Terry also said that while the BEIPC board falls under Idaho open meeting laws, the TLG, CCC, or PFTs do not because they are not decision-making bodies.

Jeri asked for feedback on some of the ideas brought up by the PFT. First was the need to improve public involvement and communication. Jerry Boyd noted that he thought the that Communications PFT was created in part because of a realization that people weren't informed as much as they wanted to be about Basin activities. Bill Rust said that he thought people were informed, but that they were frustrated because the effort they put in as citizens doesn't seem to influence anything. No one said “you are wrong,” Bill said, but there was just silence. He said that citizens felt there was no reason to put in the effort to try to influence decisions, but that didn't mean they weren't still paying attention. Later in the meeting, Rusty Sheppard said that the development of the Lake Management Plan was another example of a situation where agencies didn't take citizens' comments seriously.

John Snider said that people just need to know that their idea was considered. People are reasonable, and are responsive to a reasoned response to their suggestions. Jerry Boyd said that he felt that East Mission Flats was an example where agencies responded well to public input by following up with specific answers to questions raised. Rusty Sheppard asked for an example of agency responsiveness, and Bonnie Douglas noted that DEQ and EPA lowered the maximum height of the repository. Rusty said that the height of the repository could still be raised if more repository capacity was needed. Andy Mork noted that DEQ and EPA also changed their approach to transportation at the site based on input from the Eastside Highway District.

The second Communications PFT issue discussed was whether Commissioners should provide a summary of BEIPC work at all BEIPC board meetings. Reading an email from Jim Hollingsworth, Jerry Boyd said that Jim was concerned that, although agencies agreed to cooperate as members of the Basin Commission, they are not required to say what, specifically, they are cooperating on. Activity updates at BEIPC board meetings would serve that purpose. John Snider offered that he didn't think Commissioners would be willing to report related activities, and he said he wasn't in favor of the idea.

The third Communications PFT issue discussed was whether the BEIPC should keep a list of “action items” based on public comments at the BEIPC meetings. Bonnie Douglas noted that sometimes when citizens raise issues at BEIPC meetings, none of the Commissioners respond and no one seems to be tracking issues for follow-up. Julie Dalsaso said a good example of follow through was Andy bringing a map of the EMF

repository to the CCC meeting, as follow up to a request by a CCC member. Terry Harwood says he tries to answer questions if he knows the answer, but he doesn't have answers to all questions that come up. John Snider noted that Commissioners sometimes ask Terry to follow up with citizens on particular questions for issues. Julie Dalsaso noted that she had the experience of BEIPC Commissioners not answering questions she had about the Kootenai County comprehensive plan and Idaho funding for the Lake Management Plan. Bonnie suggested that Jeri DeLange could capture citizens' questions in the meeting notes. Terry said that comments or questions could also be captured in the CCC meeting notes.

The fourth Communications PFT issue discussed was whether and how the CCC or Communications PFT could help correct public misinformation about the cleanup. Terry posed the question of whether he, or someone else, should respond when a newspaper article, press release, or some other form of communication comes out that is incorrect. Jerry Boyd said that some people are misinformed and are open to the correct information; other people don't particularly care about what is correct or not. Jerry said that Jim Hollingsworth suggested putting together a package of materials about the Basin that could be used to respond to misinformation. Bill Rust said that the cleanup is so complex that it is sometimes hard to explain it easily (he illustrated the complexity by saying he had five bankers boxes of cleanup-related notes and documents at home.) John Snider said it is not worth it to follow up on everything, but said that it probably is worth correcting a published newspaper article.

Lake Coeur d'Alene Piling Removal

During the open discussion/CCC issues part of the agenda, Julie Dalsaso brought to the CCC's attention recent discussions on the appropriate way to remove old pilings from Lake Coeur d'Alene. She presented an April 5 *Spokesman Review* article "Mills gone, concerns are piling up." The article described how the interest in removing pilings, which can be a hazard to boats, is raising questions of how to do so without disturbing contaminated sediment. Julie attended a public meeting April 8th on the topic sponsored by Kootenai County Parks and Waterways. The issue, she said, is connected to the work of the Contaminant Management PFT, which examined what regulatory programs govern removal of contaminated sediment in Lake Coeur d'Alene. Julie felt that the piling issue was an opportunity to bring up the issue of shoreline stabilization. Terry Harwood remarked that the BEIPC board didn't make any decisions or give any direction on how to proceed with contaminant management. John Snider said he thought it was fine to have rules about things like piling removal, but only if there was data to back up the rules and to show that they were really needed.

Upcoming BEIPC Meeting

The Basin Commission Board will hold its next meeting on May 14, 2008 from 9:30 a.m. to 4:00 p.m. at the Wallace Inn (Gold Room), 100 Front St., Wallace, ID. This meeting is open to the public.

Presentation of Citizen Comments to the Basin Commission Board

April 23, 2008

Written Comments

Written comments were submitted by CCC member Jim Hollingsworth for discussion by the CCC. He previously presented them as proposals to be considered by the Communications Project Focus Team as well. They were introduced at the CCC meeting by CCC Vice-chair Jerry Boyd

Verbal Comments

Verbal comments provided at the April 23, 2008 CCC meeting are reflected in the CCC meeting summary and are paraphrased below.

Comments	Commenter
Most streambank erosion is from boats, but the amount that this erosion contributes to metals in the river pales in comparison to what is being carried down the river from contaminated areas upriver.	<i>Bill Rust, CCC member</i>
The simulations run on the lake model to date looked pretty good. However, the model's geochemistry should include pyromorphite, which is a sink for both lead and phosphate.	<i>Bill Rust, CCC member</i>
There is an Osburn City resolution against having a repository within the city limits (in reference to consideration of the Burns Yaak site as a possible repository).	<i>Bonnie Douglas, CCC member</i>
The Osburn resolution on repositories would have to be considered one of the Applicable or Relevant and Appropriate Requirements (ARAR) for a repository in Osburn, but it could be over-ruled.	<i>Bill Rust, CCC member</i>
Contamination can move laterally, as it does at the Cataldo boat ramp seeps (referencing East Mission Flats hydrology) .	<i>Bill Rust, CCC member</i>
Seep studies done by Idaho DEQ for the Spokane River might be relevant to the analysis of East Mission Flats. The DEQ contact is Gary Stevens.	<i>Julie Dalsaso, CCC member</i>
When citizens offer suggestions to the Basin Commission, they just need to know that their idea was considered. People are reasonable, and are responsive to a reasoned response to their suggestions.	<i>John Snider, CCC Chair</i>
East Mission Flats was an example of where agencies responded well to public input by following up with specific answers to questions raised.	<i>Jerry Boyd, CCC Vice-chair</i>
The Communications PFT was created in part out of concern that people weren't informed as much as they wanted to be about Basin activities.	<i>Jerry Boyd, CCC Vice-chair</i>

DEQ and EPA said they will lower the maximum height of the repository, but they can raise it again if more repository capacity is needed.	<i>Rusty Sheppard, CCC member representing the Lakeshore Owners/Spokane River SIG</i>
Many people are informed about cleanup activities, but they are frustrated because the effort they put in as citizens doesn't seem to influence anything. When I contributed information, no one said "you are wrong." They just didn't say anything. If people aren't participating, it is because they feel there is no reason to put in the effort to try to influence decisions. Many people are, however, paying attention.	<i>Bill Rust, CCC member</i>
The development of the Lake Management Plan is an example where agencies didn't take citizen comments seriously.	<i>Rusty Sheppard, CCC member representing the Lakeshore Owners/Spokane River SIG</i>
Sometimes when citizens raise issues at BEIPC meetings, none of the Commissioners respond, and no one seems to be tracking issues for follow-up.	<i>Bonnie Douglas, CCC member</i>
A good example of follow through was Andy Mork, Idaho DEQ bringing a map of the EMF repository to the CCC meeting, as follow-up to a request by a CCC member...I have had the experience of BEIPC Commissioners not answering questions I've had about the Kootenai County comprehensive plan and Idaho funding for the Lake Management Plan.	<i>Julie Dalsaso, CCC member</i>
Jeri deLange could capture citizens' questions at BEIPC meetings in the meeting notes.	<i>Bonnie Douglas, CCC member</i>
The office of the Executive Director should take pro-active steps to identify and respond to individuals or groups who have expressed confused or inaccurate information regarding the ROD or LMP. A packet should be prepared and updated quarterly that entails a brief history of the Silver Valley mining, the formation of the BEIPC including copies of the MOA's and legislation, contact info for board members and the various agencies involved, web site sources and important links. The Basin Bulletin already contains a lot of this information. The ED will give a short report of packets sent at each BEIPC board meeting.	<i>Jim Hollingsworth, CCC member (written comments, paraphrased by Jerry Boyd at CCC meeting)</i>
The cleanup is so complex it is sometimes hard to explain it easily to people to correct misinformation. I have five bankers boxes of cleanup-related notes and documents at home.	<i>Bill Rust, CCC member</i>
It is not worth trying to correct every piece of misinformation, but it is probably worth correcting an incorrect published newspaper article.	<i>John Snider, CCC Chair</i>
The agenda at each and every board meeting should reserve time for the commissioners to update the public on what they have done since the last meeting within their legal purviews to advance the ROD and LMP. This should be followed immediately by a public comment period. This will provide an example of open two way communication available to all.	<i>Jim Hollingsworth, CCC member (written comments, paraphrased by Jerry Boyd at CCC meeting)</i>
BEIPC Commissioners won't be willing to report BEIPC-related activities at every meeting. I'm not in favor of the idea.	<i>John Snider, CCC Chair</i>

Kootenai County is trying to figure out how to remove pilings from Lake Coeur d'Alene without disturbing contaminated sediment. This is an opportunity to bring up the issue of shoreline stabilization.	<i>Julie Dalsaso, CCC member</i>
It is fine to have rules about things like piling removal, but only if there is data to back up the rules and to show that they are really needed.	<i>John Snider, CCC Chair</i>