

From: [Dave Brown](#)
To: [cdd](#)
Subject: Comments on IS/MND, public hearing 22-536
Date: Wednesday, October 19, 2022 11:58:54 AM
Attachments: [CS FB 1280 N Main - MND Comments Letter 10-18-2022 compiled.pdf](#)

See attached comments.
Sincerely,

Dave Brown, P.E.

Senior Civil Engineer

Lawrence & Associates

3590 Iron Court

Shasta Lake, CA 96019

Phone: [530.275.4800](tel:530.275.4800)

dbrown@lwrnc.com | www.lwrnc.com

Sent via the Samsung Galaxy S22 5G, an AT&T 5G smartphone



022047.00

October 18, 2022

Planning Department
City of Fort Bragg
416 N. Franklin Street
Fort Bragg, CA 95437

**SUBJECT: PUBLIC COMMENT ON INITIAL STUDY AND MITIGATED
NEGATIVE DECLARATION (IS/MND) FOR 1280 N MAIN STREET
SITE, CITY OF FORT BRAGG, CALIFORNIA, USE PERMIT 4-22**

On behalf of C&S Waste Solutions (project Applicant), Lawrence & Associates (L&A) is submitting the following comments on the Amended Notice of Availability for the Initial Study and Mitigated Negative Declaration (IS/MND) related to the Use Permit and Zoning Concurrence for the site located at 1280 N Main Street, within the City of Fort Bragg, California.

The proposed project was reduced in size and significantly changed since July 2022. Prior to that time, the former project scope included additional site uses, public access, additional frontage improvements, landscaping, and lighting. As of the July revisions, the project was reduced significantly and eliminated several components as mentioned in the IS/MND. However, there are specific items in the IS/MND that appear to be un-changed and related to the former project. This letter is to provide comments to correct the potential approval conditions that would otherwise have imposed an unnecessary or contradicting requirement for development of the project. This letter also includes project specific comments for consideration.

Comments:

1. Additional Paving: Special Condition 1 (page 7, page 14 of agenda packet), indicates a requirement to add additional paving to the project, including the entire driveway for dust control, rather than allowing the facility provide dust control via water-truck or similar, on an as-needed basis. The existing access road is relatively flat and has been in use for several years by an adjacent owner. The proposed project adds a nominal increase in traffic trips and has proposed to pave the driveway and access road pavement to address

potential tracking into Highway 1 (Main Street). We respectfully request that the facility be allowed to comply with Chapter 18.62 (Dust) which is ensured through Special Condition 2, however, request to remove unnecessary paving (and associated cost) for the facility and allow them to pave at their discretion from the driveway to the proposed transfer area. Specifically we request that Special Condition #1 be deleted.

2. Landscaping: Minor edit requested to Special Condition 20. The landscape plan reference in the IS/MND relates to the prior (larger and more complex) project. The current project is reduced, however is still required to have landscaping between parking and side/rear lot lines, and also at the bioretention areas. Special Condition 20 indicates this, however, in the summary of plants, the quantities shown relate to portions of the prior project. We have shown suggested wording to maintain consistency with the overall planting schedule from the prior project, for the areas required. The following changes are requested (shown in a track-changes format).

Special Condition 20: The 5 foot wide planting and bioswale areas located between all parking lots and adjacent property lines shall be planted with native local drought tolerant plants, with trees installed every 25 feet. The Landscaping Plan species and overall plant density shown for the parking areas and bio-retention areas that were submitted for the earlier version of this project will suffice and include the following plant types: 250 of (Within the 5-foot strip:) #1 Amelanchier Alnifolia Spp. Semiintegrifolia (Western Serviceberry), and ~~17~~ #5 Lithocarpus Densiflora (TAN OAK); additionally the bioswale area shall be planted with a Matrix Planting ~~8"~~ On Center With Equal Species Distribution: Carex Obnupta (Torrent Sedge) - Salvaged From Site; Juncus Brewerii (Brewer's Rush) - Salvaged From Site; Carex Barbarae (Valley Sedge); Juncus Effusus (Common Bog Rush). Designer to be present at time of plant layout.

3. Tonnage Limits: The facility has obtained a registration permit, as indicated on page 5 of the IS/MND (page 12 of the agenda packet). The registration permit indicates and allows up to 150 tons per day (not limited to 99 tons of refuse per day as currently shown on the document). We request that the Commission accept the correction that the facility tonnage limits are as prescribed in the registration permit for the facility (150 tons). A copy of the permit is attached for your records and reference. This only affects the informational part of the document and not the conditions of approval.
4. Bioretention Areas. Based on Caltrans review and approval letter for the revised drainage report and site layout, no additional bioretention is proposed at the entrance driveway. Request that Special Conditions 12 and 25 (same wording) be edited as

follows (new wording in bold and underlined): “All runoff from impervious areas at the operational areas, shall be directed to proposed bioretention features”.

5. Mitigation and Monitoring Reporting Program comments:
 - a. HYD-1: This requires the facility to prepare and implement a construction SWPPP. The current project is below the disturbed areas thresholds that warrant the Construction General Permit (and SWPPP). This condition should only be required if conditions (e.g. disturbed area greater than 1.0 acre) requires it. The facility is subject to the Industrial General Permit program (HYD-2) and will comply with that requirement.

Sincerely,



Senior Civil Engineer

enc.: Registration Permit, dated 3-14-2022

cc: Bruce McCracken, C&S Waste Solutions, Ukiah
Curt Fujii, Waste Connections

Registration Permit Application

Facility Name: REDWOOD WASTE SOLUTIONS TRANSFER STATION

Address/Location: 1280 N. MAIN, FORT BRAGG, CA 95437

Phone Number: 707-234-6400

Facility Operator: REDWOOD WASTE SOLUTIONS, INC.

Mailing Address: PO BOX 630
UKIAH, CA 95482Address Where Process May be Served:
3515 TAYLOR DRIVE
UKIAH, CA 95482

Phone Number: 707-234-6400

Land Owner: ROBERT ROSSI

Mailing Address: PO BOX 1248
FORT BRAGG, CA 95437Address Where Process May be Served:
835 STEWART STREET
FORT BRAGG, CA 95437

Phone Number: 707-964-9270

Facility Information: DIRECT TRANSFER FACILITY

Section Authorizing Eligibility: SECTION 17402 (a)(3), TITLE 14 CCR, DIVISION 7, CHAPTER 3

Volume and Type of Waste/Materials(s) Handled:

Refuse, source-separated co-mingled recyclable material and source-separated organic material typically collected from residential and commercial customers as part of franchise agreement collection services.

Site Capacity: 150 Tons
Peak Loading: 150 Tons /Day
Annual Loading: 42,000 Tons

Days and Hours of Operation: 7 days per week, 5:00am – 8:00pm

Facility Size: 7 acres
Operating Area: 1.5 acres

Traffic:

Incoming Waste Material: 6 Vehicles Per Day
Outgoing Waste Material: 3 Vehicles Per Day

One of the Following Statements Must be Checked:

- The facility is identified and described in or conforms with the County Solid Waste Management Plan, or otherwise complies with Public Resources Code 50000; and the facility is consistent with the city or county General Plan.
- The facility is identified in either the countywide siting element, the nondisposal facility element, or in the source reduction and recycling element for the jurisdictions in which it is located ;or that the facility is not required to be identified in any of these elements pursuant to section 50001 of the Public Resources Code.

I hereby acknowledge that I have read this application, and certify under penalty of perjury that the information provided is true and accurate. In operating the facility, I agree to comply with the conditions of the permit, and with federal, state, and local enactments.

Signature of Land Owner: _____

Date: _____

3-14-22

Signature of Operator: _____

Date: _____

This application must be accompanied by a General Description Site Plan, and Location Map.

Enforcement Agency Name and Address:

FOR ENFORCEMENT AGENCY USE ONLY

Date received:
Date approved:
Date rejected:

	Filing Fee: SWIS #:
--	------------------------

Instructions for Completing Registration Application:

Fill out this application form completely and accurately. After the Enforcement Agency has review[ed] the application, it will determine whether it meets the requirements of section 18104.1. If the Enforcement Agency finds that the application is complete and correct, a copy of this application and a permit will be returned to you. If the application is not found to be complete and correct it will not be accepted for filing. For additional information on the procedure used for processing this application refer to Title 14 of the California Code of Regulations, Section 181094 et. seq.

Facility Name: The legal name of the facility.

Facility Address/Location: The address of the facility and a description of the location if different.

Facility Operator/Land Owner: Provide both the mailing addresses and the location/address where process may be served.

Section Authorizing Eligibility:

You must determine the appropriate Section in Chapters 3 or 3.1 of Division 7 of Title 14 of the California Code of Regulations that authorizes eligibility. After determining the appropriate section list it on the application.

Site Capacity: Total capacity of material that can be stored at the site at any one time.

Peak Loading: Is the largest projected waste/material quantity to be received by an operation on any day of operation.

Annual Loading: Is the maximum amount of waste/material to be handled by an operation annually.

Days and hours of Operation: The days and hours that the facility is in operation.

Facility Size: The total acreage of the site.

Operating area: The total acreage that is used for all operations.

Traffic: State the maximum number of vehicles that will enter and haul incoming material or remove material on a daily basis.

The operator is required to supply conformance-finding information. Whichever one of the two statements above is appropriate to your operation must be checked. To help you in making this determination, you can contact the Enforcement Agency, Local Task Force, or other solid waste-planning agency in your city or county.

The application must include a site map and a location map. The site map should include, but not be limited to, operations areas and their relationships to property boundaries, adjacent land uses, proposed drainage systems, any excavation areas, and any other portions of the site dedicated to a specific use. The location map should show the general location of the operation at a scale size minimally equivalent to 1:24,000 USGS topographical quadrangle.

This application must be signed, under penalty of perjury, by both the land owner and the operator.

Facility Plan
Redwood Waste Solutions Transfer Station
- Direct Transfer Operation -
Fort Bragg, California
March 2022

Introduction

Redwood Waste Solutions, Inc. (“RWS”) is proposing to develop a Direct Transfer Operation (“Direct Transfer Operation”) at 1280 North Main Street in Fort Bragg, CA (“Property”). The facility will be located on a portion of a 7± acre parcel (APN-069-231-121) in an area that is zoned Inland Light Industrial (IL) under the City of Fort Bragg Inland Land Use and Development Code and has a land use designation of Light Industrial (I) under the City of Fort Bragg Inland General Plan. A description of the activities proposed to be performed on the site by RWS is provided below.

Facility Owner & Operator

Property Owner: Robert Rossi
 PO Box 1248
 Fort Bragg, CA 95437
 (707) 964-9270

Operator: Redwood Waste Solutions, Inc.
 PO Box 60
 Ukiah, CA 95482
 (707) 234-6400

Schematic Drawing

See attached schematic drawing of the Site Plan & Location Map.

Facility Activities

The Direct Transfer Operation is designed to receive curbside refuse, source-separated recyclables and source-separated organics for direct reloading into specially designed transfer trailers (Direct Load Trailers) for transport to off-site processing facilities. All material will be delivered primarily by municipal collection vehicles. The facility will not be open to the public. As indicated on the Site Plan, the Direct Transfer Operation will take place on an existing concrete pad located on the east side of the Property. The Direct Transfer Operation includes the use of an above ground ramp/loading dock (Loading Dock) which is suitable for a single collection vehicle to back on to. The Direct Load Trailer, positioned at the loading dock, has the ability to expand the side walls near the rear of the trailer so as to allow a collection vehicle to back into the trailer. While the collection vehicle’s rear wheels remain on the loading dock, the rear of the collection vehicle will be far enough inside the trailer to discharge its load fully contained within the trailer. The Direct Load Trailer is equipped with a walking floor so as the collection vehicle discharges its load, the material will be simultaneously moved towards the front of the trailer by the walking floor mechanism. Once the collection vehicle discharges its load, it will pull out of the trailer making way for the next collection vehicle to unload. While it will vary depending on the volume and types of material contained in each collection vehicle, the Direct Load Trailer should be able to accommodate approximately three collection vehicle loads on average prior to off-site transfer.

The refuse stream shall consist of material typically collected from residential and commercial customers that cannot be recycled or reused.

The recyclables stream shall consist of source-separated co-mingled recyclable materials including glass, plastics, paper, cardboard, steel and aluminum cans and other materials typically collected from residential and commercial customers as part of municipal recycling programs.

The organics stream shall consist of green waste, food waste, landscape and pruning waste, nonhazardous wood waste, and food-soiled paper waste.

While the permit shall allow for up to 150 tons of total material received daily, RWS anticipates approximately 107 tons per day received at the Direct Transfer Operation.

Collection vehicles will enter the property from North Main Street and proceed to the Loading Dock. As described above, the collection vehicles will back into the Direct Load Trailer and discharge their load. Once empty, the trucks will exit the facility to return to collection routes or be parked for the night.

Transfer vehicles will enter the property from North Main Street and will proceed to the Loading Dock to receive materials from the collection vehicles. Once fully loaded, the transfer trucks will exit the facility and transport material to end processing facilities.

Days and Hours of Operations

The hours of operation for the Direct Transfer Operation will be 5:00am to 8:00pm, seven days per week.



March 1, 2022

Gary Leonard
Environmental Health, County of Mendocino
860 N. Bush Street
Ukiah, CA 95482

Subject: Update Request – NDFE – Direct Transfer Facility

Dear Mr. Leonard,

I am writing to request that Redwood Waste Solutions' (RWS) proposed direct transfer facility in Fort Bragg be identified in the Non-Disposal Facility Element of the Mendocino County Integrated Waste Management Plan.

The following information is provided as specified in the CalRecycle General Guidelines for Updating a Non-Disposal Facility Element (NDFE):

Name of Facility	Redwood Waste Solutions Transfer Station
Type of Facility	Direct Transfer
Location	1280 N. Main, Fort Bragg, CA. 95437
Anticipated Diversion Rate	50%
Facility Capacity	150 tons per day
Participating Jurisdictions	Mendocino County

Thank you for your consideration and please feel free to contact me should you have any questions, or need further information in order to process our request.

Sincerely,

A handwritten signature in black ink that reads "KCB".

Kristyn Byrne
Director, Community & Government Affairs