

## CALIFORNIA ENVIRONMENTAL QUALITY ACT INITIAL STUDY

The Department of Toxic Substances Control (DTSC) has completed the following document for this project in accordance with the California Environmental Quality Act (CEQA) [Pub. Resources Code, div. 13, § 21000 et seq] and accompanying Guidelines [Cal. Code Regs., tit. 14, § 15000 et seq].

<b>PROJECT TITLE:</b> Georgia-Pacific Corp Fort Bragg Mill Site OU-C & OU-D Project – Remedial Action Plan		<b>CALSTARS CODING:</b> 20040200
<b>PROJECT ADDRESS:</b> 90 West Redwood Avenue	<b>CITY:</b> Fort Bragg	<b>COUNTY:</b> Mendocino
<b>PROJECT SPONSOR:</b> Georgia-Pacific, LLC	<b>CONTACT:</b> Dave Massengill	<b>PHONE:</b> (404) 652-5054

**APPROVAL ACTION UNDER CONSIDERATION BY DTSC:**

- |  |  |  |                                       |
|--|--|--|---------------------------------------|
| <input type="checkbox"/> Initial Permit Issuance             | <input type="checkbox"/> Permit Renewal                  | <input type="checkbox"/> Permit Modification | <input type="checkbox"/> Closure Plan |
| <input type="checkbox"/> Removal Action Workplan Regulations | <input checked="" type="checkbox"/> Remedial Action Plan | <input type="checkbox"/> Interim Removal     | <input type="checkbox"/>              |
| <input type="checkbox"/> Other (specify):                    |  |  |                                       |

**STATUTORY AUTHORITY:**

- ☐ California H&SC, Chap. 6.5   ☒ California H&SC, Chap. 6.8   ☐ Other (specify):

<b>DTSC PROGRAM/ ADDRESS:</b> Brownfields and Environmental Restoration Program 700 Heinz Avenue, Suite 200 Berkeley, CA 94710-2721	<b>CONTACT:</b> Thomas Lanphar	<b>PHONE:</b> (510) 540-3776
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**PROJECT DESCRIPTION:**

The California Department of Toxic Substances Control (DTSC) pursuant to regulatory authority granted under Chapter 6.8, Division 20 of the Health and Safety Code (H&SC) is considering approval of a Remedial Action Plan (RAP) to address soil and groundwater contamination existing at the Operable Unit (OU) C and OU-D sites located at the former Georgia-Pacific Corporation, Inc. Mill Site. The remedial activities will involve excavation of approximately 1,108 to 1,858 cubic yards (yds<sup>3</sup>) or approximately 60 - 90 truckloads (approximately 120 – 180 round trips) of contaminated soils from 5 excavation sites. Excavated soil will be transported off-site and taken to an authorized hazardous waste disposal facility. In addition, approximately 1,108 to 1,858 yds<sup>3</sup> of clean backfill materials will be imported from a nearby off-site location.

Remedial action will also include installation of soil covers, implementation of natural attenuation and monitoring to address contaminants present in groundwater beneath the site, site restoration activities, imposition of Land Use Covenants (LUCs), and approval of an Operations and Maintenance Plan.

**Background**

According to historic records, Union Lumber Company (ULC) began sawmilling operations at the 4215

acre site in 1885. Georgia-Pacific Corporation acquired the site in 1973 and ceased lumber operations in August 2002. Industrial operations at the site included lumber production and power generations by burning residual bark and wood. Most of the equipment and structures associated with the lumber production have since been removed. OU-C and OU-D are situated within the Upland Zone of the Mill Site, which is the elevated land beginning from the inland edge of the Coastal Trail and Parkland Zone. (Attachment B, Figure 2) OU-C is approximately 105 acres and OU-D is approximately 159 acres.

OU-C and OU-D have been subdivided into 32 Areas of Interest (AOIs). The RAP currently under consideration addresses 21 AOIs- proposing Remedial Actions for 10 AOIs and No Further Action (NFA) for 11 AOIs. Of the remaining 11 AOIs in OU-C and OU-D, eight received No Further Action determinations in the RI Report and three were transferred to OU-E. These three AOIs (West IRM, IRM, and Riparian) were removed from OU-C and placed into OU-E because of similarities in environmental setting with OU-E and the possible day-lighting of Maple Creek. Soil, soil gas and groundwater are contaminated within OU-C and D. Groundwater plumes are stable, isolated, and generally decreasing in size. Groundwater at the former mill site is currently not being used. Below is a summary of the contaminants at the 10 AOIs with remedial actions proposed in the RAP.

1. Parcel 2 AOI:

- Groundwater: dioxin in shallow groundwater. Depth to groundwater is approximately 4-5 feet below ground surface (bgs).

2. Former Aboveground Storage Tank (AST) AOI:

- Soil: lead within the first two feet of soil and total petroleum hydrocarbons (TPH) at approximately 10 – 12 feet bgs.
- Soil vapor: benzene, ethylbenzene, 1,2,4-trimethylbenzene, and naphthalene is associated with TPH in soil and groundwater.
- Groundwater: benzene, naphthalene, TPH, tetrachloroethene (PCE), and cis-1,2-dichloroethene (cis-1,2-DCE) in shallow groundwater. Depth to groundwater is approximately 10 feet bgs.

3. Former Mobile Equipment Shop/Pilot Study AOI:

- Soil: lead within the first two feet of soil and total petroleum hydrocarbons (TPH) at approximately 10 – 12 feet bgs.
- Soil vapor: benzene, ethylbenzene, 1,2,4-trimethylbenzene, and naphthalene is associated with TPH in soil and groundwater.
- Groundwater: benzene, naphthalene, TPH, tetrachloroethene (PCE), and cis-1,2-dichloroethene (cis-1,2-DCE) in shallow groundwater. Depth to groundwater is approximately 10 feet bgs.

4. Former Dip Tank AOI:

- Soil: dioxins/furans and pentachlorophenol (PCP) in shallow soil from 0 to 2 feet bgs.
- Groundwater: dioxins/furans and PCP in shallow groundwater. Depth to groundwater is approximately 8 feet bgs.

5. Rail Lines East AOI:

- Soil: lead and Benzo(a)Pyrene [B(a)P] in shallow soil from 0 to 2 feet.

## 6. Kilns AOI:

- Soil: TPHd and B(a)P in shallow soil from 0 to 2 feet.

## 7. Former Planer #2 AOI:

- Soil: TPHd and B(a)P at 4 to 5 feet bgs.
- Soil Vapor: 1,1-dichloroethene, 1,2,4-trimethylbenzene, PCE, vinyl chloride associated with similar contaminants in groundwater
- Groundwater: 1,1-dichloroethane (1,1-DCA), 1,1-dichloroethene (1,1-DCE), and naphthalene. Depth to groundwater is approximately 3 to 5 feet bgs.

## 8. Former Shipping Office and Truck Shop AOI:

- Soil: TPHd in deep soil at approximately 9 to 10 feet bgs.

## 9. Sawmill/Sorter AOI:

- Groundwater: arsenic at approximately 4 to 5 feet bgs.

## 10. Greenhouse AOI:

- Groundwater: atrazine at approximately 7 to 9 feet bgs.

*Project Activities:*

The remediation activities are proposed to be implemented in two (2) phases starting in the Summer 2015 and ending in Summer 2016. Phase 1 is expected to take one (1) to two (2) weeks where four (4) areas of approximately 358 yds<sup>3</sup> of chemicals of concern (COCs) impacted soils will be excavated and Phase 2 is expected to take two (2) to four (4) weeks to excavate COC impacted soils at one location with the projected volume of 750 to 1,500 yds<sup>3</sup>. The anticipated soil removed from both phases equal approximately 1,108 to 1,858 yds<sup>3</sup>. All excavated soils will be transported to an off-site permitted facility for disposal. The time frame of project implementation may change based on permitting and coordination with the cleanup at the California Western Railroad.

*Soil Contamination*

- Excavation of 1,108 to 1,858 yds<sup>3</sup> of contaminated soils from five locations and disposal of soil at an off-site permitted facility(ies). Soils will be transported to either Keller Canyon Landfill in Pittsburg or Hay Road Landfill in Vacaville or another facility permitted to accept the contaminated soil. The total combined acreage of area disturbed by the excavations is less than one acre.
- Importation of approximately 1,108 to 1,858 yds<sup>3</sup> of backfill material from the Noyo Harbor Dredge Sand, from a location south and adjacent to the site and at the north side of the entrance to Noyo Harbor, or from another as-yet undetermined source for backfill material if material from Noyo Harbor is not available. Some of the excavations are small and may not require backfill material and will be graded to match existing grade. Backfill material will be tested for contaminants in accordance with DTSCs October 2001 *Imported Advisory on Clean Fill Material*.
- Site restoration involves the backfill or excavation areas to match existing grade and based on the current surface, re-vegetation with California coastal native plant seed mix or finished with stone or gravel.
- Recording Land Use Covenant (LUC) to restrict residential and other sensitive uses of property with residual soil or soil gas contamination exceeding unrestricted remedial goals and



restrictions on the use of groundwater containing contaminants that exceed groundwater remedial goals.

#### Groundwater

Groundwater remediation activities involve the removal of the source of groundwater contamination in the soil, as described above, and the reliance on Natural Attenuation (NA) processes to achieve remedial goals of contaminants in groundwater. NA relies on the processes naturally occurring within the aquifer to gradually reduce the mass, toxicity, mobility, volume, or concentration of contaminants in groundwater. Activities such as groundwater pumping or the injection of chemical or biological additives to the groundwater are not needed for natural attenuation. The NA remedy does include regular groundwater monitoring, as operations and maintenance activities, to document the rate of contaminant reduction and determine if remedial goals are met. Natural Attenuation processes include a variety of physical, chemical, or biological processes, including absorption, reduction and bioremediation. Groundwater will be monitored using existing groundwater monitoring wells and no new wells will be installed. Operations and Maintenance (O&M) will be conducted at locations where residual soil and groundwater contamination remains on-site and a LUC is required.

### ENVIRONMENTAL IMPACT ANALYSIS:

#### 1. Aesthetics

##### Project Activities Likely to Create an Impact:

- Construction activities (e.g. staging, excavating, importing, stockpiling, decontamination, etc) at designated areas.
- Temporary landscape modifications including excavation, regrading, and revegetation.
- Use of heavy equipment and trucks during excavation and transportation of contaminated soils.
- Use of heavy equipment and trucks during importation of clean soils/backfill.
- Site restoration and monitoring activities.

##### Description of Baseline Environmental Conditions:

The former Georgia-Pacific mill is bounded by the Pacific Ocean to the west, open coastline to the north, Noyo Bay to the south, and the City to the east. OU-C is located in the northern half of the former mill site (north of Oak Street) and between the Coastal Trail northern section (OUA- north) and the City of Fort Bragg. OU-D is located in the southern part of the former mill site (south of Oak Street) and between the Coastal Trail southern section (OUA-south) and the City of Fort Bragg. OU-C and OU-D are essentially vacant and only a few building remain from the former mill operations. The vacant property provides some vistas from the City of Fort Bragg to the ocean. The view from the City to the ocean is obstructed in most places by fences, trees and buildings.

The California Department of Transportation (Caltrans) has classified SR 1 (aka Highway 1) between Marin City and Leggett as an eligible scenic highway (Caltrans 2011). The City's certified Local Coastal Program (LCP) identified land west of SR 1 as a scenic corridor. The City's Municipal Code Section 18.61.02 states that new development must minimize the alteration of landforms, be visually compatible with the surrounding area, designed to protect views to and along the ocean and scenic coastal areas, and restore the visual quality of visually degraded areas when feasible (City of Fort Bragg 2008).

##### Analysis as to whether or not project activities would:



- a. Have a substantial adverse effect on a scenic vista.

**Impact Analysis:**

The proposed remedial actions (excavations, groundwater Natural Attenuation and LUCs) of the OU-C & OU-D RAP would not have a substantial adverse effect on a scenic vista because the scenic vistas of the Pacific Ocean and coastline view at Pudding Creek and Noyo River are oriented away from the subject property. Additionally, distance reduces the potential for adverse effects from the proposed project; the closest designated coastal scenic corridors are located approximately one mile north of the Project Site at the public access facility at the mouth of Pudding Creek and one mile south along the base of the Noyo River bluffs at the end of North Harbor Drive. A substantial adverse effect on a scenic vista is not expected because excavation activities will be short-term and limited (3 - 6 weeks) and all excavation areas will be returned to grade level by backfilling and then re-vegetated or covered with rock or gravel to replicate the current grade and type of vegetative cover. Natural Groundwater Attenuation takes place below ground surface and would not be visible. LUCs are legal administrative documents that would not affect the visual environment.

**Conclusion:**

- ☐ Potentially Significant Impact  
☐ Potentially Significant Unless Mitigated  
☐ Less Than Significant Impact  
☒ No Impact

- b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings and historic buildings within a state scenic highway.

**Impact Analysis:**

The Project Site has been previously disturbed and developed for industrial operations. Implementation of the proposed project would not damage any scenic resources, such as trees, rock outcroppings, or historic buildings.

**Conclusion:**

- ☐ Potentially Significant Impact  
☐ Potentially Significant Unless Mitigated  
☐ Less Than Significant Impact  
☒ No Impact

- c. Substantially degrade the existing visual character or quality of the site and its surroundings.

**Impact Analysis:**

The proposed project is temporary and will only last approximately 3 - 6 weeks for both phases. The remedial activities (excavation activities, stockpiling of soils, etc.) are not expected to block views of the coast from public access points around the site (i.e. SR 1, Noyo River, City of Fort Bragg) because existing structures block any view of the work areas from coastal views, the work areas are distant from public access/viewpoints, or the work areas are at topographically lower points. Based on the limited number of coastal views, the limited potential for the activities to block scenic views, and the temporary nature of the proposed project, degradation of the visual quality surrounding the site would not be expected to occur.

**Conclusion:**

- ☐ Potentially Significant Impact  
☐ Potentially Significant Unless Mitigated  
☐ Less Than Significant Impact  
☒ No Impact

- d. Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area.

**Impact Analysis:**

The remedial actions (excavations, groundwater Natural Attenuation and LUCs) of the OU-C & OU-D Remedial Action Plan will take place only during the day and will not require new sources of permanent or temporary lighting.

**Conclusion:**

- ☐ Potentially Significant Impact  
☐ Potentially Significant Unless Mitigated  
☐ Less Than Significant Impact  
☒ No Impact

**References Used:**

1. ARCADIS, *Remedial Action Plan Operable Units C and D, Former Georgia Pacific Wood Products Facility*, 2015
2. CALTRANS, *Named Freeways, Highways, Structures and Other Appurtenances In California*, 2006
3. CALTRANS, *California Scenic Highway System*, (updated 9/07/2011) ([http://www.dot.ca.gov/hq/LandArch/scenic\\_highways/](http://www.dot.ca.gov/hq/LandArch/scenic_highways/)). Website accessed March 21, 2015. City of Fort Bragg, *Coastal General Plan, Conservation, Open Space, Energy, and Parks*, updated 2008.
4. TRC, *Phase II Determination of Significant Standing Structures, Georgia-Pacific Lumber Mill, Fort Bragg, California*, undated)
5. TRC, *Archaeological Survey of the Georgia Pacific Lumber Mill Fort Bragg, California*, 2003

**2. Agricultural Resources**

**Project Activities Likely to Create an Impact:** NONE. The proposed project is not located in or near any agricultural resources. Although the area is designated as "Timber Resources Industrial" in the City's Land Use Plan within a Coastal Zone combined zoning designation of IT-CZ (City of Fort Bragg, 2008), the site is vacant and has not been used for processing timber since 2002. Implementation of the proposed project would not affect the viability of the site to be used again at some point in the future for processing timber. Therefore, no impacts to agricultural resources will occur. For these reasons, no further analysis of impacts to this category is deemed necessary.

**Description of Baseline Environmental Conditions:**

Analysis as to whether or not project activities would:

- a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use.

**Impact Analysis:** The project site does not include any type of farmlands.

**Conclusion:**

- ☐ Potentially Significant Impact  
☐ Potentially Significant Unless Mitigated  
☐ Less Than Significant Impact  
☒ No Impact

- b. Conflict with existing zoning or agriculture use, or Williamson Act contract.

**Impact Analysis:** The project site is not zoned for agricultural use.



## Conclusion:

- ☐ Potentially Significant Impact  
☐ Potentially Significant Unless Mitigated  
☐ Less Than Significant Impact  
☒ No Impact

- c. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural uses.

Impact Analysis: See above. There would be no changes to existing environment which could result in conversion of farmland to non-agricultural uses.

## Conclusion:

- ☐ Potentially Significant Impact  
☐ Potentially Significant Unless Mitigated  
☐ Less Than Significant Impact  
☒ No Impact

## References Used:

1. California Department of Conservation, Farmland Mapping and Monitoring Program, Mapping Important Farmland <http://maps.conservation.ca.gov/ciff/ciff.html>
2. City of Fort Bragg, Land Use Designation Map, July 22, 2008 <http://city.fortbragg.com/pdf/ZoningMapRevisionDate7-22-2008.pdf>.

**3. Air Quality**

## Project Activities Likely to Create an Impact:

- Use of construction equipment (e.g. trucks, bulldozers, excavators, etc), worker vehicles, and other construction activities.
- Transportation of excavated soil by trucks to off-site disposal facility.
- Importation of clean backfill materials.
- Generation of dust during excavation, backfilling, grading, stockpiles, and transportation of contaminated soils and possible clean soils.

## Description of Baseline Environmental Conditions:

The site is located in the North Coast Air Basin, within the jurisdiction of Mendocino County Air Quality Management District (MCAQMD). The MCAQMD establishes air pollution control measures for the North Coast Air Basin. Mendocino County is an "attainment area" for most local, state, and federal air quality standards, including Particulate Matter (PM) 2.5. Mendocino County is a non-attainment area for suspended particulate matter less than 10 microns in size (PM10) under the State PM-10 standard. The primary sources of PM-10 pollution in the area are wood combustion (woodstoves, fireplaces, and outdoor burning), fugitive dust, automobile traffic, and industry. In the City, the salt spray from the Pacific Ocean contributes to the non-attainment status for PM10, but dust from unpaved roads is the largest source of PM10 in the area (MCAQMD, 2005).

Excavation, backfilling, grading, transportation activities may result in temporary increases in airborne dust emissions during construction. These activities are subject to the conditions of Regulation 1, Rule 430 (Fugitive Dust Emissions) of the MCAQMD, which prohibits activities that cause unnecessary



amounts of particulate matter to become airborne. MCAQMD Rule 1-430(b) requires that reasonable precautions shall be taken to prevent particulate matter from becoming airborne.

According to MCAQMD regulation Rule 1 -130(L1) Large Grading Activities definition and Rule 1 – 200(a) Authority to Construct, a grading and dust control permit is required for large grading activities, which is defined as grading activities involving more than one (1) acre of exposed soil or more than one mile of road during any single calendar year. Although OU-C and OU-D are over 260 acres, the area of exposed soil for proposed remedial action excavation activities is less than one acre; therefore, the project does not require a Construction and Grading permit from the MCAQMD.

#### Analysis as to whether or not project activities would:

- a. Conflict with or obstruct implementation of the applicable air quality plan.

##### Impact Analysis:

The MCAQMD published a Particulate Matter Attainment Plan in 2005 (MCAQMD, 2005a). This plan provides policy and direction for the eventual attainment of the PM10 state and federal air quality standards. As part of the plan, MCAQMD has established rules regulating activities that can generate fugitive and permit requirements for construction projects with over 1 acre of disturbance.

MCAQMD Rule 1-430(b) requires that reasonable precautions shall be taken to prevent particulate matter from becoming airborne. Because the project may generate dust, which could contain hazardous materials, dust control best management practices, including those identified in MCAQMD Rule 1-430(a) will be used as mitigation measures to ensure that no significant dust impacts occur.

##### Mitigation Measures:

MM1: Excavation activities will be suspended if winds exceed 15 miles per hour (mph) sustained (for 15 minutes) or 25 mph (instantaneous gusts).

MM2: Vehicles entering or exiting construction areas will travel at a speed that minimizes dust, but not to exceed 15 mph. Construction workers will park in designated parking area(s) to reduce dust. All unpaved areas shall have a posted speed limit of 10 mph.

MM3: Water will be applied by means of trucks, hoses, and/or sprinklers prior to removal and excavation activities to minimize dust.

MM4: Water will be applied to disturbed areas as needed to keep working surfaces moist enough to minimize dust.

MM5: The disturbed work area will be sprayed with water at the end of the work shift to form a thin crust.

MM6: Earth or other material tracked onto neighboring (onsite or offsite) paved roads shall be removed promptly. Onsite paved roads will be washed down as needed. Parking areas, staging areas, and traffic pathways on the site shall be cleaned, as necessary, to control dust. Adjacent public streets shall also be cleaned, promptly, if soil materials from the site are visible.

MM7: Water will be applied to visibly dry unpaved roads to keep road surfaces moist enough to minimize dust emissions.

MM8: Soil stockpiles will be placed atop and covered with heavy-duty plastic sheeting when they are not actively being managed. Stockpile covering will be in good condition, joined at the seams, and securely anchored to minimize headspace where vapors may accumulate.

MM9: When not covered, soil stockpile surfaces will be kept visibly moist by water spray.

MM10: Open bodied trucks shall be covered when used to transport materials with the potential for airborne dust; and

MM11: Trucks and tires will be washed off before leaving the Mill Site to minimize tracking of dioxin/furans-affected dirt onto Cypress Street and/or SR 1. The waste water shall be collected with catch basin(s), managed on-site, and transported off-site for disposal.

Conclusion:

- ☐ Potentially Significant Impact  
☒ Potentially Significant Unless Mitigated  
☐ Less Than Significant Impact  
☐ No Impact

- b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation.

Impact Analysis:

The proposed project would not be expected to result in, or substantially contribute to, an air quality violation for PM<sub>10</sub> due to size of the project, less than one acre of disturbed area, and the control measures listed above in Section 3a. Mendocino County is a non-attainment area for only PM<sub>10</sub>. The size of the project, less than one acre of disturbed area, is below the threshold for needing a MCAQMD permit. Daily emissions are presented and compared to MCAQMD standards on the table below.

Excavation of approximately 1,600 yds<sup>3</sup> of TPHd contaminated soil, as part of the approximately 1,858 yds<sup>3</sup>, is planned as Remedial Actions in the OUs C and D RAP. However, excavation and off-site disposal activities are not likely to generate significant emissions as the volume of soil is moderate and falls below the less than one acre of disturbed area threshold for the MCAQMD.

Emissions from heavy-duty trucks or excavation equipment (gasoline and diesel fueled) are not expected to result in significant short-term air quality impacts or violations as trucks would be limited to a 25 trucks per day maximum. Off-site heavy-duty diesel truck traffic would be limited to 25 truck round trips per day maximum. This includes the trucks used for off-site disposal and for trucks in-hauling Noyo River sand.

Table 1 below list the estimated daily emissions for specific contaminants including Reactive Organic Gases (ROG), Nitrous Oxides (NO<sub>x</sub>), Carbon monoxide (CO), sulfur dioxide (SO<sub>2</sub>), and particulate

matter (PM) 2.5 and 10 and compares the contaminants to the MCAQMD standards (MCAQMD, Rule 1-130(s2) Definitions). This shows that the annual emissions are insignificant when compared to the standards of the SCAQMD.

Table 1. Operational Emissions Georgia-Pacific Former Mill Site, Fort Bragg

Annual Operational Emissions						
Facility Operations	Maximum Estimated Emissions (pounds per day)					
	ROG	NO <sub>x</sub>	CO	SO <sub>2</sub>	PM <sub>2.5</sub>	PM <sub>10</sub>
Site Preparation, Excavation, Transport, Disposal, and Restoration <sup>1</sup>	6.39	5.49	5.74	0.00933	0.06466	0.1933
Mendocino County Air Quality Management District Standards <sup>2</sup>	NA	220	550	220	135	80
1. CalEEMod, Version 2013.2.2. Model Run Date: 4/27/2015						
2. MCAQMD, Rule 1-130 (s2): Significant definition.						

Conclusion:

- ☐ Potentially Significant Impact  
☐ Potentially Significant Unless Mitigated  
☒ Less Than Significant Impact  
☐ No Impact

- c. Result in cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors).

Impact Analysis:

Mendocino County is in non-attainment for only PM<sub>10</sub>. The table presented in section 3c shows that the estimated daily PM<sub>10</sub> emissions, based on the CalEEMod model analysis, is far below the daily PM<sub>10</sub> standard of the MCAQMD (Rule 1-130(s2)). Mendocino County is in attainment for all other criteria pollutants.

Conclusion:

- ☐ Potentially Significant Impact  
☐ Potentially Significant Unless Mitigated  
☐ Less Than Significant Impact  
☒ No Impact

- d. Expose sensitive receptors to substantial pollutant concentrations.

Impact Analysis:

The closest sensitive receptors (i.e., schools, daycare facilities, residences, etc.) to the excavation sites are at least 300 ft. to 1,200 ft. (0.25 miles) of the proposed excavations. The closest receptors are residences, located on West Pine Street are approximately 300 feet north of the planned excavation at the Aboveground Storage Tank Area of Interest (Attachment B, Figure 2). Fort Bragg Middle School and Fort Bragg Elementary School, are the nearest schools, and are approximately 0.8 miles from the excavation sites at the former Georgia-Pacific mill site. The nearest hospital, Coast Hospital, is approximately 1.5 miles from the excavation sites at the former Georgia-Pacific mill site.



BMPs identified in above Section 3a will minimize the generation of visible dust and prevent dust from migrating offsite. As discussed in above Section 3b and shown in the table, emission of PM10 and other pollutants are expected to be well below standards set by MCAQMD. Therefore, impacts associated with excavation, earth moving, and grading activities are considered less than significant. Signs will be posted at the fence line of the Mill Site identifying who to contact in case someone in the public has questions or concerns.

**Conclusion:**

- ☐ Potentially Significant Impact  
☐ Potentially Significant Unless Mitigated  
☒ Less Than Significant Impact  
☐ No Impact

**e. Create objectionable odors affecting a substantial number of people.**

**Impact Analysis:**

The project includes the planned excavation and off-site disposal of approximately 1,000 yds<sup>3</sup> of petroleum, primarily diesel, contaminated soil. The MCAQMD does not have specific regulations or rules addressing petroleum contaminated soil. Diesel contaminated soil can have odors, but the excavation areas are small, less than one acre, and mitigation measure MM8 listed in above Section 3a will minimize odors. Therefore, no significant objectionable odors will be affecting a substantial number of people.

**Conclusion:**

- ☐ Potentially Significant Impact  
☐ Potentially Significant Unless Mitigated  
☒ Less Than Significant Impact  
☐ No Impact

**f. Result in human exposure to Naturally Occurring Asbestos (see also Geology and Soils, f.).**

**Impact Analysis:**

The Soil Survey for Mendocino County, Western Part (NRCS, 2002) maps soils onsite as Urban Land. Urban Land is described as being covered by approximately 60 percent paved surface containing landscaped areas and areas that have been graded for urban development. The map prepared by the MCQAMD showing areas that may contain naturally occurring asbestos in Mendocino County does not indicate that naturally occurring asbestos has been found in the Fort Bragg area. Based on the description of Urban Land and the map prepared by the MCQAMD, it is not anticipated that the proposed project would encounter naturally occurring asbestos. Therefore, no human exposure will occur.

**Conclusion:**

- ☐ Potentially Significant Impact  
☐ Potentially Significant Unless Mitigated  
☐ Less Than Significant Impact  
☒ No Impact

**References Used:**

1. AME, *Work Plan for Additional Site Assessment, Georgia-Pacific California Wood Products Manufacturing Facility, 90 West Redwood Avenue, Fort Bragg, California, 2005*
2. ARCADIS BBL, *Remedial Action Plan, Operable Unit A, August 2008*
3. ARCADIS, *Remedial Action Plan, Operable Unit C and D Remedial Action Plan, 2015*
4. *Mendocino County Air Quality Management District Air Pollution Control Rules, 2005*
5. *National Resource Conservation Service, Soil Survey for Mendocino County, Western Part, 2002*
6. *Mendocino County Air Quality Management District, Particulate Attainment Plan, 2005*

#### 4. Biological Resources

##### Project Activities Likely to Create an Impact:

- Excavation and transportation of contaminated soils, storage, backfilling, and other construction activities
- Importing of clean soils/backfill from Noyo Harbor Dredge Sands
- Use of heavy equipment (e.g. trucks, graders, bulldozers, excavators, etc).

##### Description of Baseline Environmental Conditions:

The excavation areas are within industrial areas of the former mill site and away from sensitive areas (Operable Units C and D Remedial Investigation Report, Figure 2-15 Habitat Map, ARCADIS February 2011). The majority of the closed mill site, and the area where the excavations will occur, has been extensively modified since the late 1800s for use as a sawmill, including a shipping and rail terminus, and for related forest products processing. The excavation site locations are within vacant former industrial areas and are covered with concrete, asphalt, dirt or gravel. The other areas of OU-C and OU-D are also former industrial property used for lumber milling or storage.

Environmentally Sensitive Habitat Areas (ESHAs) are defined in the California Coastal Act and LCP for the City and Mendocino County. A habitat assessment performed in 2005 identified five non-sensitive and seven sensitive plant communities onsite (WRA, 2005; updated 2007). The former sawmill site contains a variety of sensitive habitat areas of varying biological integrity including marine terrace bluff top margins populated in some areas with rare plants, coastal bluff face areas containing potential nesting sites and foraging areas for a variety of shoreline avian species, and wetland areas. Other ESHAs located in the Southern District of the Mill Site include the South Ponds, and the Maple Street Riparian Area located approximately 600 ft. to the east and north east. Offshore of the site is an intertidal rocky habitat providing substrate for intermittently exposed tide pools and persistently submerged littoral flora and fauna. The excavation areas and transportation routes are not adjacent to, or within sensitive areas.

Non-sensitive plant habitats found at the site include developed/industrial, non-native grassland, north coast buff scrub, beach, and planted coniferous woodland. Four of the five non-sensitive communities are found within the area designated as OU-A including developed/industrial, non-native grassland, northern coastal bluff scrub, and coastal strand. The non-sensitive community "developed/industrial" dominates the areas designated for remedial activities in the OU-C and D RAP.

Ruderal areas, including non-native grasslands, are potential nesting sites for ground nesting birds protected under the Migratory Bird Treaty Act (MBTA). Excavation areas are outside of ruderal areas that are potential nesting sites for ground nesting birds and are outside of ESHAs.

No temporary staging or stockpile areas in OU-C and OU-D will be located within or near sensitive habitats or ESHAs as described above.

##### Analysis as to whether or not project activities would:

- a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.

##### Impact Analysis:



The proposed project's five excavation areas are within the industrial area of the former mill site, which is currently covered with asphalt or concrete and are all further than 50 feet from an ESHAs. Therefore, no substantial adverse effect, directly or through habitat modifications, on any species identified as candidate, sensitive, or special status species in local or regional plans, policies, or regulation by the California Department of Fish and Game or U.S. Fish and Wildlife Services will occur. Refer to above Section 4 Description of Baseline Environmental Conditions for additional detail.

Conclusion:

- ☐ Potentially Significant Impact
- ☐ Potentially Significant Unless Mitigated
- ☐ Less Than Significant Impact
- ☒ No Impact

- b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.

Impact Analysis:

The proposed project's five excavation areas are beyond 50 feet of any riparian habitat or other environmentally sensitive natural community. The excavation areas are within industrial areas of the former mill site, which are covered with concrete or asphalt. Therefore, no substantial adverse effect on any riparian habitat or other sensitive natural community will occur. Refer to above Section 4 Description of Baseline Environmental Conditions for a discussion on riparian habit and sensitive natural communities, including designated ESHAs.

Conclusion:

- ☐ Potentially Significant Impact
- ☐ Potentially Significant Unless Mitigated
- ☐ Less Than Significant Impact
- ☒ No Impact

- c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.

Impact Analysis:

The proposed project's five excavation areas are not near or within any federally protected wetlands. The excavation areas are within industrial areas of the former mill site, which are covered with concrete or asphalt. Therefore, no substantial adverse effect on federally protected wetlands will occur.

BMPs identified in the Stormwater Pollution Prevention Plan (SWPPP) (ARCADIS 2010) will be implemented to reduce the potential of indirect impacts on waters of the U.S. by reducing or eliminating erosion and sedimentation during earth moving activities.

Conclusion:

- ☐ Potentially Significant Impact
- ☐ Potentially Significant Unless Mitigated
- ☐ Less Than Significant Impact
- ☒ No Impact

- d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.



**Impact Analysis:**

The proposed project is not located within the ocean or in established waterways (i.e. streams, rivers). The excavation areas are within industrial areas of the former mill site. There are also sufficient surrounding open lands outside the OU-C & OU-D for wildlife to avoid the remediation sites. The temporary construction activities at these locations will not affect migratory wildlife corridors. Therefore, no substantial impacts to native resident or migratory fish or wildlife species will occur. Refer to above Section 4 Description of Baseline Environmental Conditions for a discussion regarding the location of the excavation locations with established waterways and ESHAs.

**Conclusion:**

- ☐ Potentially Significant Impact
- ☐ Potentially Significant Unless Mitigated
- ☐ Less Than Significant Impact
- ☒ No Impact

- e. Conflict with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

**Impact Analysis:**

Remediation activities of OU-C & OU-D would not require the removal of trees. Section 18.62.060 of the City's Municipal Code states that "Grading shall be designed and grading operations shall be conducted to minimize the removal or disturbance of native vegetation to the maximum extent feasible." The City's Municipal Code also requires that trees not approved for removal in a grading permit to be protected from damage by proper grading techniques, fencing, and conducting no grading or heavy equipment operations within the protected zone of the trees. Therefore, the proposed project would not conflict with local policies or ordinances protecting biological resources.

**Conclusion:**

- ☐ Potentially Significant Impact
- ☐ Potentially Significant Unless Mitigated
- ☐ Less Than Significant Impact
- ☒ No Impact

- f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

**Impact Analysis:**

No habitat conservation plan or natural community conservation plan has been adopted or prepared that encompasses the site or the vicinity of the project site. Consequently, the proposed project would not conflict with such plans.

**Conclusion:**

- ☐ Potentially Significant Impact
- ☐ Potentially Significant Unless Mitigated
- ☐ Less Than Significant Impact
- ☒ No Impact

**References Used:**

1. Biosearch, *Red-legged frog Identification, Georgia-Pacific Fort Bragg Facility, Mendocino County California, 2010*
2. ARCADIS, *draft Remedial Action Plan, Operable Unit C and D, 2015*
3. ARCADIS, *Remedial Investigation Report, Operable Unit C and D, Figure 2-5 Habitat Map OU C and OU D, February 2011*
4. *City of Fort Bragg, Municipal Code Section 18.62.060*

5. WRA Environmental Consultants, *Delineation of Potential Section 404 Jurisdictional Waters and Waters*, 2005
6. WRA Environmental Consultants, *Biological Assessment*, 2005; updated 2007
7. WRA Environmental Consultants, *Avian Habitat Utilization and Impact Assessment*, 2006
8. Teresa Sholars, *Botanical Survey for the Georgia-Pacific Mill Site Bluffs*, 2005

## 5. Cultural Resources

### Project Activities Likely to Create an Impact:

- Excavation and transportation of contaminated soils, backfilling, and other ground disturbing activities.
- Importing of clean soils/backfill from an adjacent site.
- Use of heavy equipment (e.g. trucks, graders, bulldozers, excavators, etc).

### Description of Baseline Environmental Conditions:

This cultural resources investigation indicated a high potential for cultural resource sites in large portions of the property (TRC undated; TRC, 2003). The known pre-historic sites are located all along the bluff areas within OU-A. The earlier surveys of the mill site did not identify any prehistoric sites located within the OU-C and D excavation areas, but potential historic resources (i.e., older building foundations, etc.) could be present in these areas (considered to have a moderate-to-high potential for historic resources).

The project area is within the boundaries of the Historic Mendocino Indian Reservation and the Fort Bragg Native American Archaeological District Boundary (City of Fort Bragg, Fort Bragg Coastal Restoration and Trail Project Subsequent Environmental Impact Report (EIR), 2013).

### Analysis as to whether or not project activities would:

- a. Cause a substantial adverse change in the significance of a historical resource as defined in 15064.5.

#### Impact Analysis:

A cultural resources site reconnaissance prepared for the mill site (Archaeological Survey of the Georgia-Pacific Lumber Mill Fort Bragg, California, TRC Companies, Inc., March 2003) as well as subsequent work by Garcia and Associates (March 2010) indicates that there is a high potential for cultural resource sites in large portions of the property. The remedial activities of OU-C and OU-D are within the boundaries of the Historic Mendocino Indian Reservation and the Fort Bragg Native American Archaeological District Boundary (City of Fort Bragg, Fort Bragg Coastal Restoration and Trail Project Subsequent Environmental Impact Report (EIR), November 2014). Therefore, the project could potentially impact historical resources as defined in 15064.5.

The following is a brief summary of mitigation measures that will be implemented prior to and during construction activities by a professional archaeologist who meets the minimum requirements in accordance with the Secretary of Interior's Professional Qualifications, 36CFR Part 61 to ensure that the historical resources are protected. Details can be obtained in the Fort Bragg Coastal Restoration and Trail Project Subsequent EIR (November 2014).

#### Mitigation Measures:

MM12: A professional archaeologist and/or architectural historian will review previous archaeological reports prior to ground disturbing activities to identify the location and perimeter of historical resources within the Area of Potential Effect (APE); OU-C, and OU-D. These sensitive areas will be protected by appropriate fencing.

MM13: The professional archaeologist and a Native American Monitor will be on site during all ground disturbing activities.

MM14: Upon discovery of historical resources during construction activities, the professional archaeologist will halt all work within 50 ft. radius of the find until an assessment has been completed, and simultaneously report findings to the DTSC and City.

MM15: The professional archaeologist will submit a draft and final Phase II Investigation Report to the DTSC and City for review and approval.

MM16: The professional archaeologist must record and submit all necessary DPR 523 Forms to the California State Parks, Office of Historic Preservation upon completion of the Phase II Investigation Report.

Conclusion:

- ☐ Potentially Significant Impact  
☒ Potentially Significant Unless Mitigated  
☐ Less Than Significant Impact  
☐ No Impact

- b. Cause a substantial adverse change in the significance of an archeological resource pursuant to 15064.5.

Impact Analysis:

A cultural resources site reconnaissance prepared for the mill site (Archaeological Survey of the Georgia-Pacific Lumber Mill Fort Bragg, California, TRC Companies, Inc., March 2003) as well as subsequent work by Garcia and Associates (March 2010) indicates that there is a high potential for cultural resource sites in large portions of the property. OU-C and OU-D locations are not within any areas where archeological resources were identified during these surveys, but there is a potential for impacts on archeological resources because the remedial activities of OU-C and OU-D are within the boundaries of the Historic Mendocino Indian Reservation and the Fort Bragg Native American Archaeological District Boundary (City of Fort Bragg, Fort Bragg Coastal Restoration and Trail Project Subsequent EIR, November 2014).

On March 28, 2014 DTSC sent Native American consultation letters to 19 Tribes and interested Native American community members that were identified on the Native American Heritage Commission's (NAHC) Contact List for Mendocino County. Three (3) response letters were received from 1) the Sherwood Valley Rancheria Band of Pomo Indians (Sherwood Valley Pomo), 2) the Potter Valley Tribe of Pomo Indians, and 3) the Kashia Band of Pomo Indians. Only the Sherwood Valley Pomo responded with an interest to participate in further consultation and requested the presence of Tribal Monitors at the five excavations planned for OU C and D (Sherwood Valley Rancheria Band of Pomo Indians letters dated April 9, 2014).

On June 2, 2014 the Sherwood Valley Pomo and the City of Fort Bragg entered into a Memorandum of Understanding (MOU) (Attachment C) that defines Communication and Consultation Protocols, Native American Cultural Resource Treatment Protocols, Mitigation, and Monitoring. The MOU between the Sherwood Valley Pomo and the City of Fort Bragg is applicable to any project, at the former mill site, where the City of Fort Bragg performs a discretionary activity, which requires environmental review



under CEQA. Because the City of Fort Bragg is also the issuing agency for the Coastal Development Permit and the Grading Permit, which are necessary for implementation of excavation activities of this project, the mitigation measures included in the MOU are applicable requirements for this project. Further, the Sherwood Valley Pomo identified the measures included in the MOU as appropriate for mitigating potentially significant impacts of the currently proposed project.

**Mitigation Measures:**

MM12 through MM16 will also be implemented for the preservation and protection of archaeological resources during construction activities. Refer to section 5a above.

MM17: Native American or Tribal Monitor(s) will be Hazardous Waste Operations and Emergency Response (HazWOPER) trained and certified. Copies of current HazWOPER certification will be provided to DTSC and the City prior to implementation of construction activities.

MM18: Tribal monitoring services will be required whenever construction activities include ground disturbance of native soils in, or adjacent to, known and suspected archaeological sites. If during construction activities any archaeological artifacts or features are encountered, both the Project Archaeologist and the Tribal Monitor(s) are empowered to stop construction activities within a 50 foot radius of the find. Work within this buffer shall temporarily cease until the Project Archaeologist, in consultation with the Tribal Monitor, make a determination on (1) whether the find is an archaeological artifact; (2) whether the find is located within an intact context (i.e. not within disturbed fill soils), (3) whether the find is part of a site area that has been mitigated through data recovery, (4) whether the find is an isolated item, (5) whether the find is part of a larger previously unknown archaeological site, and (6) the best course of action to avoid or minimize impacts to the resources as applicable.

MM19: If the find is determined to be both in an intact context, and meets the standard for designation as an archaeological site or is a portion of a known archaeological site, then the provisions of the Coastal Land Use and Development Code (CLUDC 17.50.030E), and the Memorandum of Understanding (MOU) and attachments between the City of Fort Bragg and Sherwood Valley Band of Pomo Indians shall be followed.

MM20: If the find is determined to be within an area mitigated through data recovery, it shall be expeditiously documented pursuant to the terms of the Data Collection Plan (DCP) and the ESA Monitoring Plan. Materials that are not collected by the archaeologist will be reburied onsite in the designated cultural resource reburial area or other area as agreed upon in writing by the parties.

MM21: If the find is determined to be either from a clearly disturbed context (i.e. disturbed fill soils, back dirt piles) or the find is determined to be an isolated find that is clearly not associated with an archaeological site, the item shall be recorded as such and then reburied onsite in the designated cultural resource reburial area or other area as agreed upon in writing by the parties.

**Conclusion:**

- ☐ Potentially Significant Impact
- ☒ Potentially Significant Unless Mitigated
- ☐ Less Than Significant Impact
- ☐ No Impact

c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

**Impact Analysis:**

The proposed project is not expected to directly or indirectly destroy a unique paleontological resource or unique geological features in or in close vicinity to the sites. No paleontological resources are known to be present at these locations. Therefore, this project would not result in

impacts on a unique paleontological or geological feature. Refer to Fort Bragg Coastal Restoration and Trail Project Subsequent Environmental Impact Report (EIR), 2014)

Conclusion:

- ☐ Potentially Significant Impact
- ☐ Potentially Significant Unless Mitigated
- ☐ Less Than Significant Impact
- ☒ No Impact

- d. Disturb any human remains, including those interred outside of formal cemeteries.

Impact Analysis:

A cultural resources site reconnaissance prepared for the mill site (Archaeological Survey of the Georgia-Pacific Lumber Mill Fort Bragg, California, TRC Companies, Inc., March 2003) as well as subsequent work by Garcia and Associates (March 2010) indicates that there is a high potential for cultural resource sites in large portions of the property. The remedial activities of OU-C and OU-D are within the boundaries of the Historic Mendocino Indian Reservation and the Fort Bragg Native American Archaeological District Boundary (Fort Bragg Coastal Restoration and Trail Project, Phase II, Subsequent Environmental Impact Report (EIR), November, 2014).

Although there is a historic cemetery at the former mill site, the five OU-C and D excavation locations are outside of areas identified as the historic cemetery. Therefore, no disturbance of human remains or formal cemeteries is anticipated to occur. However, if human remains and associated items are encountered at any time during this undertaking all applicable state and federal laws including but not limited to, Health and Safety Code §7050.5, PRC 5097.94, and/or PRC 5097.98 will be enforced.

Mitigation Measures:

MM12 through MM21 will also be implemented for the preservation and protection of any accidental discoveries of human remains and their associated funerary objects during construction activities. Refer to 5a and 5b.

Additionally, the following mitigation measures must also be implemented with this RAP:

MM22: Human remains will not be disturbed or removed from their original resting place unless removal is unavoidable and necessary.

MM23: Procedures for the discovery of human remains and associated items are as follows.

- a. Georgia-Pacific or designee shall first contact the appropriate law enforcement agency (County Coroner) and immediately notify the Tribal Chairman and Tribal Historic Preservation Officer (THPO) or assigned designee. If the remains constitute a crime scene, all applicable laws and procedures apply.
- b. If the discovery is not a crime scene, all ground disturbing activities shall cease at the discovery location including a buffer as determined by the Project Archaeologist, in consultation with the Tribal monitor and the THPO, but not less than 50 feet. No construction activities will take place within the buffer until an archaeological investigation has been completed.
- c. Out of respect for the remains, all work related to the remains shall be conducted out of the public eye, unless otherwise required by law.
- d. If the Coroner determines that the remains are of, or thought to be of Native American origin, they are required to contact the Native American Heritage Commission pursuant to PRC 5097.98.
- e. The Native American Heritage Commission (NAHC) will then immediately designate a person or persons it believes is the Most Likely Descendent (MLD). The MLD shall within 48 hours of being notified recommend means for treating and disposing with appropriate dignity, the human remains and associated items.

- f. The preferred protocol upon the discovery of Native American human remains is to secure the area, cover any exposed human remains or other cultural items, and to avoid further disturbance. No laboratory studies are permitted. The preferred treatment for exhumed Native American human remains is reburial in an area not subject to further disturbance. Should reburial of the human remains be required, Georgia-Pacific shall rebury them in the designated reburial area on site.

Conclusion:

- ☐ Potentially Significant Impact  
☒ Potentially Significant Unless Mitigated  
☐ Less Than Significant Impact  
☐ No Impact

References Used:

1. ARCADIS, draft Remedial Action Plan for Operable Units C and D, 2015
2. City of Fort Bragg, Fort Bragg Coastal Restoration and Trail Project, Phase II, Subsequent EIR, November 2014
3. The City of Fort Bragg City Government; ci.fort-bragg.ca.us
4. Van Bueren, Historic Property Survey Report and Findings of Effect for the Fort Bragg Coastal Trail Project in the City of Fort Bragg, California, July 30, 2010
5. TRC, Phase II Determination of Significant Standing Structures Georgia Pacific Lumber Mill Fort Bragg, California, undated
6. TRC, Archaeological Survey of the Georgia Pacific Lumber Mill Fort Bragg, California, 2003
7. TRC, Site Specific Treatment Plan for Cultural Resources, Georgia Pacific Lumber Mill, Fort Bragg, California – Draft, 2006
8. Sherwood Valley Band of Pomo Indians, letters to Thomas Lanphar, dated April 9, 2014.
9. City of Fort Bragg and Sherwood Valley Band of Pomo Indians, Monitor Agreement for the Fort Bragg Coastal Trail Project, April 9, 2014
10. Garcia and Associates, Archeological Extended Phase I Studies Within the Northern Portion of the Georgia-Pacific Corporation Property, Fort Bragg, Mendocino, March 2010

## 6. Geology and Soils

Project Activities Likely to Create an Impact:

- Transportation of contaminated soils, storage, backfilling, and other construction activities
- Importation of clean soils/backfill from Noyo Harbor Dredge Sands
- Use of heavy equipment (e.g. trucks, graders, bulldozers, excavators, etc).

Description of Baseline Environmental Conditions:

Fort Bragg is located along the northern California coastline within the Coast Range geomorphic province. The regional geology consists of complexly folded, faulted, sheared, and altered bedrock. The bedrock of the region is the Franciscan Complex (Complex) and consists of a variety of rock types. In the north coast region the Complex is divided into two units, the Coastal Belt and the Melange. In Mendocino County, the Melange lies inland and is an older portion of the Complex, ranging in age from the Upper Jurassic to the late Cretaceous. The Coastal Belt consists predominantly of greywacke sandstone and shale.

Relative to the project site, the San Andreas Fault is offshore about nine miles. The Coastal Belt has undergone weak to intensive deformation, which has included folding, uplifting, tilting, and overturning. Also, of importance to the seismicity of the region is the Mendocino Triple Junction, the terminus of the



San Andreas Fault, which is located in the Cape Mendocino area approximately 80 miles to the north-northwest of Fort Bragg. This boundary represents the point at which the San Andreas Fault, the Mendocino Fracture Zone, and the Cascadia Subduction Zone meet. It is an extremely active tectonic and seismic zone and earthquakes have occurred frequently in the area.

Other geologic units present in the City and the vicinity include surface geologic units, including deposits of beach and dune sands, alluvium, and marine terrace deposits. The most important of these at the site are the marine terrace deposits of Pleistocene age, which cut bedrock surfaces along the coast and form much of the coastal bluff material overlying bedrock. The marine terrace deposits are massive, semi consolidated clay, silt, sand and gravel, ranging from 1 to 140 feet in thickness.

The site is underlain by Quaternary (less than 1.5 million years old) terrace sediments (BCI, 2006). The terrace deposits consist of poorly to moderately consolidated marine silts, sands, and gravels and are overlain by a 3- to 4-foot-thick mantle of topsoil. The terrace soils are underlain by Tertiary-Cretaceous marine sediments (approximately 65 million years old) of the Coastal Belt Franciscan Formation, composed of well consolidated sandstone, shale, and conglomerate. Currently, the bluffs at the site range from 0 to 80 feet in height (BACE Geotechnical, 2004).

The topsoil, terrace deposits, and Franciscan Formation are each exposed within the bluff face throughout the site. The topsoil is dark brown to black silty and clayey sand. The terrace soils consist of partly cemented, tan and orange-brown, sandy silt, with occasional lenses of cemented pebbly sand. The total thickness of the topsoil and terrace units typically varies from about 5 to 30 feet; in places, up to 20 feet of this can consist of emplaced fill (BACE Geotechnical, 2004).

The marine terraces contain strong, northwesterly trending structural features, including an unnamed, concealed fault south of the site. These features are parallel to the more regional fault traces, such as the San Andreas Fault west of the site (BACE Geotechnical, 2004; BCI, 2006). Several inactive faults and one potentially active fault have been observed in the bluffs at the site. The potentially active fault crosses a small, narrow peninsula within the northern bluffs; however, there is no evidence of movement along the fault within the last 11,000 years.

The regional hydrogeologic setting of the Mendocino County coast has been described in the *Mendocino County Coastal Ground Water Study* (California Department of Water Resources, 1982). The site is in the western coastal area of the county, which was divided into five subunits in the study: Westport, Fort Bragg, Albion, Elk, and Point Arena; these areas are separated by the major rivers that discharge to the Pacific Ocean. The site is located within the City's subunit, which extends from Big River on the south to Ten Mile River on the north.

Due to the undulating surface of relatively shallow Franciscan bedrock in the area of OU-C and D, the presence of groundwater in the overlying marine sediments is not continuous. Groundwater flow in this area is controlled by the seasonal fluctuation in the water table and its relationship to the contact between the fairly conductive marine sediments and relatively impermeable Franciscan bedrock. Recent monitoring of the shallow and deep piezometers installed in the vicinity of the Cell has confirmed that where flow occurs in the marine sediments, it is toward the northwest under an average horizontal hydraulic gradient of approximately 0.02 ft./ft. Typically, the average groundwater elevation beneath OU-C and D has been on the order of 74 ft. above mean sea level, and the drop in hydraulic head across the feature has commonly been about seven feet (ARCADIS 2011). Average depth to groundwater relative to ground surface is nine to ten feet.

Generally, monitoring data and topographic gradients demonstrate that onsite groundwater flow is primarily to the west-southwest toward the Pacific Ocean. The principal natural hydrological sources for the site are precipitation, surface runoff from adjacent lands, and stormwater discharge from the City. Most of the hydrological features at the site are manmade; over a century of sawmill operations have modified the natural hydrology significantly.

Analysis as to whether or not project activities would:

- a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:
- Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault. (Refer to Division of Mines and Geology Special Publication 42).
  - Strong seismic ground shaking.
  - Seismic-related ground failure, including liquefaction.
  - Landslides.

Impact Analysis:

There are no active earthquake faults in the City and all excavation areas would be graded to achieve stable slopes, positive drainage and match surrounding grade. The San Andreas Fault is located approximately nine miles to the west and the Maacama fault is approximately 22 miles to the east. Remedial activities of OU-C and OU-D would not have any adverse effect on the existing faults and would not create any hazard that could result in the exposure of any persons to increased risk due to fault activity, liquefaction, are ground-borne vibration because no known faults occur within the project area. Therefore, no impacts are expected.

Conclusion:

- ☐ Potentially Significant Impact  
☐ Potentially Significant Unless Mitigated  
☐ Less Than Significant Impact  
☒ No Impact

- b. Result in substantial soil erosion or the loss of topsoil.

Impact Analysis:

Removal of soil from the proposed project's five excavation areas will not result in loss of topsoil. The excavation areas are currently covered in concrete, asphalt, dirt or rock. Backfilled soils would be graded and compacted to ensure erosion associated with surface/ground water flow does not occur and all areas will be revegetated or covered with gravel following backfilling activities. Erosion control measures outlined in the construction SWPPP (ARCADIS 2010) would also be employed. All soil erosion control BMPs would remain in place until vegetation is established.

Conclusion:

- ☐ Potentially Significant Impact  
☐ Potentially Significant Unless Mitigated  
☒ Less Than Significant Impact  
☐ No Impact



- c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or off-site landslide, lateral spreading, subsidence, liquefaction or collapse.

**Impact Analysis:**

The proposed project activities are located in relatively flat areas more than 1,000 feet from the coastal bluffs.

The OU-C and OU-D are not located on unstable soil, coastal bluffs, or areas that would be subject to landslide, lateral spreading, subsidence, liquefaction or collapse. The proposed project will not generate unstable geologic or soil conditions. Therefore, no impacts will occur.

**Conclusion:**

- ☐ Potentially Significant Impact  
☐ Potentially Significant Unless Mitigated  
☐ Less Than Significant Impact  
☒ No Impact

- d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property.

**Impact Analysis:**

The proposed project involves removing contaminated soil from five excavation areas. Based on the analysis contained in the Engineering Geologic Reconnaissance report (Brunsing Associates, Inc., 2004), the excavation areas are not located on expansive soils as defined in Table 18-1-B of the Uniform Building Code (1994).

**Conclusion:**

- ☐ Potentially Significant Impact  
☐ Potentially Significant Unless Mitigated  
☐ Less Than Significant Impact  
☒ No Impact

- e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of water.

**Impact Analysis:**

The proposed project does not entail the construction or installation of septic tanks or alternative wastewater disposal systems. Therefore, it would not result in impacts due to alternative wastewater disposal systems.

**Conclusion:**

- ☐ Potentially Significant Impact  
☐ Potentially Significant Unless Mitigated  
☐ Less Than Significant Impact  
☒ No Impact

- f. Be located in an area containing naturally occurring asbestos (see also Air Quality, f.).

**Impact Analysis:**

The Soil Survey for Mendocino County, Western Part (NRCS, 2002) maps soils at the former mill site as Urban Land. Urban Land is described as being covered by approximately 60 percent paved surface containing landscaped areas and areas that have been graded for urban development. The map prepared by the MCQAMD showing areas that may contain naturally occurring asbestos in

Mendocino County does not indicate that naturally occurring asbestos has been found in the Fort Bragg area. Based as the description of Urban Land and the map prepared by the MCQAMD, the proposed project does not anticipate encountering naturally occurring asbestos. Therefore, no impacts associated with disturbance of asbestos materials would occur.

Conclusion:

- ☐ Potentially Significant Impact
- ☐ Potentially Significant Unless Mitigated
- ☐ Less Than Significant Impact
- ☒ No Impact

References Used:

1. ARCADIS. 2014. *Second 2014 Semi-Annual Groundwater Monitoring Report, Former Georgia-Pacific Wood Products Facility, Fort Bragg, California. Prepared for Georgia-Pacific LLC. ARCADIS U.S., Inc. December.*
2. *National Resource Conservation Service, Soil Survey for Mendocino County, Western Part, 2002*
3. Brunsing Associates, Inc., Engineering Geologic Reconnaissance report, 2004

## 7. Greenhouse Gas Emissions

Project Activities Likely to Create an Impact:

- Emissions created by construction equipment (e.g. trucks, graders, bulldozers, excavators, etc) and use of construction personnel vehicles
- Transportation of contaminated soils and waste materials, storage, backfilling, and other construction activities.
- Importation of clean soils/backfill.

Description of Baseline Environmental Conditions:

Unlike emissions of criteria and toxic air pollutants, which have local or regional impacts, emissions of greenhouse gases (GHGs) that contribute to global warming or global climate change have a broader, global impact. Global warming is a process whereby GHGs accumulating in the atmosphere contribute to an increase in the temperature of the earth's atmosphere. The principal GHGs contributing to global warming are carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), and fluorinated compounds. These gases allow visible and ultraviolet light from the sun to pass through the atmosphere, but they prevent heat from escaping back out into space. Global climate change has the potential to impact sea level, water supply, agricultural resources, and natural wildlife habitats.

Anthropogenic (human generated) greenhouse gases are primarily produced through the use of stationary and mobile engines running on fossil fuels (for example: coal, gasoline, diesel, natural gas, etc.). GHG emissions can be reduced through the use of alternative fuels and reduced reliance on fossil fuel energy and transportation.

In California, the transportation sector is the largest emitter of GHGs, followed by electricity generation. California produced 474 million gross metric tons (MMT) of CO<sub>2</sub> equivalent (CO<sub>2</sub>e)<sup>1</sup> averaged over the

<sup>1</sup> CO<sub>2</sub>e is a measurement used to account for the fact that different GHGs have different potential to retain infrared radiation in the atmosphere and contribute to the greenhouse effect. This potential, known as the global warming potential (GWP) of a GHG, is dependent on the lifetime, or persistence, of the gas molecule in the atmosphere. Expressing emissions in CO<sub>2</sub>e takes the contributions of all GHG emissions to the greenhouse effect and converts them to a single unit equivalent to the effect that would occur if only CO<sub>2</sub> were being emitted.



period from 2002 to 2004. Combustion of fossil fuel in the transportation sector was the single largest source of California's GHG emissions in 2002 to 2004, accounting for 38 percent of total GHG emissions in the state. This sector was followed by the electric power sector (including both in-state and out-of-state sources; 18 percent) and the industrial sector (21 percent; BAAQMD, 2011).

The Mendocino County Air Quality Management District (MCAQWMD) has not adopted a GHG plan using CEQA; therefore local GHG thresholds are not available for comparison. The MCAQMD has requested that Bay Area Air Quality Management District (BAAQMD) CEQA Air Quality Guidelines (BAAQMD Guidelines) adopted on June 6, 2010, be used for projects in Mendocino County (June 2010). The Bay Area Air Management District (BAAQMD) recommends using their 2009 CEQA Proposed Thresholds of Significance guidance for comparison. The BAAQMD guidance does not include a threshold for construction projects; therefore, a comparison to the BAAQMD Significance Threshold for non-stationary projects is used as a surrogate and this threshold is 1,100 metric tons per year. Projects that exceed the thresholds are considered to result in a cumulatively considerable contribution of GHG emissions and a cumulatively significant impact to global climate change. The BAAQMD Guidelines recommend that the Lead Agency quantify and disclose GHG emissions that would occur during construction, and make a determination on the significance of these construction-related GHG emission impacts. Therefore, for this project, the construction emissions would be compared to the operational threshold for projects other than stationary sources.

Analysis as to whether or not project activities would:

- a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.

**Impact Analysis:**

The remedial activities of OU-C and OU-D will use construction equipment and include approximately 60 to 90 roundtrips, to and from the disposal facility(ies), during the four to six weeks of construction activities. Excavators will excavate and load soil onto haul trucks. Backfill soil will be marine sediment from a Noyo Harbor, located adjacent to the Mill Site. To determine the potential impacts from GHG emissions from the construction of the proposed project, the CalEEMOD Model (version 2013.2) was used to estimate construction emissions. Table 2 presents construction GHG emissions.

As shown in Table 2, estimated CO<sub>2</sub> equivalents (CO<sub>2</sub>e) emission from the construction of the proposed project is 384,532 metric tons. While the construction of the proposed project would constitute an increase in GHG emissions, the quantity of emissions would be expected to be below the operational GHG emission thresholds (used as a surrogate for construction activity threshold) of 1,100 metric tons per year. The project would not include maintenance operations that would include any stationary or mobile sources of greenhouse gases. Therefore, removal of soil from the five excavation areas in OU C and D would not result in any direct or indirect greenhouse gas generation that would result in a significant impact on the environment.

Table 2. GHG Emissions for Construction Activities - CO<sub>2</sub>e

Activity	CO <sub>2</sub> e pounds per day	Number of Days for Activity	Total CO <sub>2</sub> Emissions
Site Preparation	1,030.8469	5	5,154.2345 pounds (lbs.)
Excavation (grading)	1,205.7861	25	30,144.6530 lbs. or 13.6734 metric tons
Hauling (round trip transport to off-site)	32,455.3046	25	811,382.60 lbs. or 368.0369 metric tons

disposal facility)			
Paving (site restoration including local backfill)	1,244.2120	5	6,221.06 lbs. or 2.8218 metric tons
<b>Totals</b>	<b>34,742.942</b>		<b>847,748.31 lbs. or 384.5321 metric tons</b>

Source: CalEEMOD analysis completed by DTSC

**Conclusion:**

- ☐ Potentially Significant Impact  
☐ Potentially Significant Unless Mitigated  
☒ Less Than Significant Impact  
☐ No Impact

- b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

**Impact Analysis:**

The City of Fort Bragg has an adopted Climate Action Plan (City of Fort Bragg, 2012). The Climate Action Plan addresses goals and strategies to reduce ongoing emissions of GHG from government and private sector commercial operations. As the proposed activity, is a one-time activity that will not result in on-going operational GHG emissions, the proposed project does not conflict with the City's Climate Action Plan. Additionally, two types of analyses were used to determine whether the proposed action would conflict with the state goals for reducing GHG emissions. The analyses are as follows:

- A. Any potential conflicts with CARB's 39 recommended actions in California's AB 32 Climate Change Scoping Plan were identified; and
- B. Whether the proposed project would result in GHG emissions exceeding significance thresholds established in the 2011 BAAQMD CEQA Guidelines.

With regard to Item A, the proposed project, which entails the removal of an existing feature would not fall into any sub-categories of the CARB recommended actions nor would the project pose any apparent conflict by inhibiting any of the CARB recommended actions.

For Item B, as discussed in the previous section, construction and operational emissions would result in less than significant impacts. Refer to Section 7 Description of Baseline Environmental Conditions for additional information.

**Conclusion:**

- ☐ Potentially Significant Impact  
☐ Potentially Significant Unless Mitigated  
☐ Less Than Significant Impact  
☒ No Impact

**References Used:**

1. Bay Area Air Quality Management District (BAAQMD), CEQA Air Quality Guidelines, May 2011.
2. BAAQMD, Proposed Air Quality CEQA Thresholds of Significance, December 7, 2009
3. Mendocino County Air Quality Management District, Memorandum CEQA Criteria and GHG Pollutant Thresholds. June 3, 2010.



#### 4. City of Fort Bragg, Climate Action Plan, 2012.

### 8. Hazards and Hazardous Materials

#### Project Activities Likely to Create an Impact:

- Excavation and transportation of contaminated soils to permitted off-site disposal facility (ies).
- Leakage of hazardous substances (e.g. petroleum products, etc.) from construction equipment (bulldozers, graders, excavators, etc) and heavy-duty trucks.

#### Description of Baseline Environmental Conditions:

OU-C and OU-D have been subdivided into 32 AOIs based on historical use and data derived from previous investigations (Attachment B, Figure 2). In the OU C and D Remedial Investigation (RI) Report (ARCADIS, 2011), an analysis of the nature and extent of COCs in AOIs identified approximately 190 acres within 14 AOIs required no further remedial action (NFA). The following 8 AOIs received NFA determinations for the entire area within the AOI.

In the OU-C and OU-D RI Report, DTSC determined that No Further Action (NFA) is needed for the following AOIs:

1. Parcel 1
2. Truck Loading Shed
3. Former Green Chain
4. Construction Engineering
5. Scales
6. Clinker/Fill
7. Former Airstrip
8. Cypress Gate

All or portions of ten additional AOIs are recommended for NFA in the OU-C and OU-D RAP. These 10 AOIs were not included in the RI Report NFA determination because of the need to establish buffers from AOIs with known contamination. However, the RI Report concluded that these AOIs were otherwise suitable for NFA. The Parcel 6 AOI is also proposed for NFA in the OU-C and OU-D RAP. The Parcel 6 AOI was not investigated in the Remedial Investigation, because there is no history of the use or release of hazardous substances in the AOI. The following 10 AOIs are proposed for NFA in the OU-C and OU-D RAP.

1. Rail Lines West
2. Dry Sheds #4, #5
3. Former Planer #1, #50
4. Former Log Storage and Sediment Stockpile
5. Log Dec
6. Former Sheep Barn
7. Former Oil House
8. Miscellaneous
9. TransformerPad
10. Parcel 6

The OU-C and OU-D RAP will address soil and groundwater contamination at 11 Areas of Interest (AOIs) within OU-C and D through the use of a combination of remedial activities including soil excavation and off-site disposal, soil vapor mitigation, Natural Attenuation of contaminants in groundwater, restrictions on

land use and groundwater through a Covenant to Restrict the Use of Property (Land Use Covenant), and Operation and Maintenance. The area of the 11 AOIs is approximately 70 acres. The seven AOIs within in OU-C are located on the eastern side of the former mill site and west of the City of Fort Bragg between Alder Street and Pine Street. Three of the four OU-D AOIs are located south of the mill pond and east of the City of Fort Bragg Sewage Treatment Plant. The fourth OU-D AOI is located on the eastern side of the former mill site and north of the Cedar Street entrance to the mill site (Attachment B, Figure 2).

The proposed project includes excavation and off-site disposal of contaminated soil from 5 AOIs where soil is contaminated with lead, dioxins/furans (dioxins), benzo(a)pyrene [B(a)P], petroleum hydrocarbons and pentachlorophenol (PCP) from ULC and Georgia-Pacific lumber and milling operations that occurred between 1885 and 1973. Approximately 1,108 to 1,858 yds<sup>3</sup> or approximately 60 - 90 truckloads of COCs impacted soils from five excavation sites have been identified for removal from these AOIs. Additionally, the groundwater is contaminated with petroleum hydrocarbons, PCP, dioxins, atrazine, arsenic, and volatile organic compounds (VOCs) from the same sources.

Soil Vapor Mitigation is the proposed remedial action for AOIs, including the Former AST, the Former MES/Pilot Study AOIs, and the Planer #2 AOI, where previous investigations have identified the presence of COCs (including benzene, ethyl benzene, 1,2,4-trimethylbenzene, naphthalene, vinyl chloride, 1,1-dichloroethane, 1,1-dichloroethene) in soil vapor that presents an unacceptable risk to public health. The existing conditions (open space) at the former Mill Site do not present an immediate need for the implementation of Soil Vapor Mitigation; however future construction and use in these areas may require Soil Vapor Mitigation. At the Former AST and Former MES/Pilot Study AOIs, removal of contaminants in soil that are the source of soil vapor contamination is also included in the proposed remedial action for soil vapor. The actual Soil Vapor Mitigation measures shall be submitted to and approved by DTSC prior to any future use of the AOIs. The Operations and Maintenance Plan will specify procedures that will ensure the long-term effectiveness of the covers and/or barriers.

Remedial action for AOIs with residual contaminants, above levels considered safe for residential use, will also have use restriction placed upon them through a Land Use Covenant (LUC). The LUC will restrict residential and other sensitive land uses unless special conditions, identified in the LUC, are met. Commercial and Industrial uses are acceptable at AOIs with LUCs. Land use covenants entered into or required by DTSC "run with the land" i.e., are binding on current and subsequent property owners, and remain in effect until they are formally removed or modified.

Groundwater Natural Attenuation, with monitoring, will be used to remediate the groundwater contaminants of petroleum hydrocarbons, PCP, dioxins, atrazine, arsenic, and volatile organic compounds (VOCs). Monitoring of groundwater will verify whether contaminants in groundwater are declining and if groundwater Remedial Goals are achieved. At the Former AST and Former MES/Pilot Study AOIs, gypsum will be added to the clean backfill material to aid in the attenuation petroleum contaminates in groundwater. A LUC will prohibit groundwater usage.

Operation and Management is included in the remedial action for all AOIs with residual soil contamination, contaminants in soil vapor or contaminants in groundwater above unrestricted Remedial Goals set forth in the OUs C and D RAP. Operation and Management Plans (OMP) will ensure the long-term effectiveness of the proposed remedial action and address soil management, inspections and maintenance of covers and soil vapor mitigation systems. Groundwater monitoring and Natural Attenuation verification are included in the OMP for the groundwater remedial action.

One AOI, the Former Machine Shop/Interim Remedial Measure AOI is proposed for No Further Action because previous excavations at the AOI have reduced soil contaminants to below unrestricted remedial goals and groundwater contaminants are also now below groundwater remedial goals included in the RAP.

The information below summarizes the recommended remedial alternatives for each AOI.



## Proposed Remedial Actions

### Parcel 2 AOI – Groundwater

#### Proposed Alternative:

- Natural Attenuation to address dioxins/furans and pentachlorophenol
- LUC restricting domestic use of groundwater above Remedial Goals
- Operations and Maintenance Plan specifying groundwater monitoring requirements

### Former AST AOI and MES/Pilot Study AOI - Surface Soil, Soil Vapor, and Groundwater

#### Soil Proposed Alternative: Former AST AOI and MES/Pilot Study AOI

- LUC restricting residential or other sensitive land uses
- Operations and Maintenance Plan, including soil management requirements

#### Soil Vapor Proposed Alternative: Former AST and MES/Pilot Study AOIs

- Source Removal: Excavation and disposal of TPHd contaminated soil
- LUC restricting residential or other sensitive land uses
- Soil Vapor Mitigation
- Operations and Maintenance Plan

#### Groundwater Proposed Alternative: Former AST and MES/Pilot Study AOIs

- Source Removal: Excavation and disposal of TPHd contaminated soil
- Natural Attenuation of Groundwater
- Operations and Maintenance Plan specifying groundwater monitoring requirements
- LUC restricting the use of groundwater above Remedial Goals

### Former Dip Tank AOI – Soil and Groundwater

#### Soil and groundwater Proposed Alternative:

- Source Removal: Excavation and Disposal of dioxin and PCP contaminated soil
- Natural Attenuation of Groundwater
- Operations and Maintenance Plan specifying groundwater monitoring requirements
- LUC restricting the use of groundwater above Remedial Goals

### Rail Lines East AOI - Surface and Shallow Subsurface Soils

#### Proposed Alternative:

- Excavation and disposal of lead contaminated soil

### Kilns AOI – Soil

#### Proposed Alternative:

- Excavation and Disposal of TPHd and B(a)P contaminated soil

### Former MS/IRM AOI – Soil and Groundwater

- No Further Action as TPHd, lead and B(a)P concentrations are below soil unrestricted remedial goals and TPHd and VOCs are below groundwater remedial goals

<b>Proposed Remedial Actions</b>
<p><b>Planer #2 AOI – Soil, Soil Vapor and Groundwater</b></p> <p><i>Soil Proposed Remedial Action:</i></p> <ul style="list-style-type: none"> <li>• <i>Excavation and disposal of TPHd and B(a)P contaminated soil</i></li> </ul> <p><i>Soil Vapor Proposed Remedial Action:</i></p> <ul style="list-style-type: none"> <li>• <i>Soil Vapor Mitigation</i></li> <li>• <i>LUC restricting residential or other sensitive land uses</i></li> <li>• <i>Operations and Maintenance</i></li> </ul> <p><i>Groundwater Proposed Remedial Action:</i></p> <ul style="list-style-type: none"> <li>• <i>Natural Attenuation of Groundwater</i></li> <li>• <i>Operations and Maintenance Plan specifying groundwater monitoring requirements</i></li> <li>• <i>LUC restricting the use of groundwater</i></li> </ul>
<p><b>Former Shipping Office and Truck Shop AOI – Soil</b></p> <p><i>Soil Proposed Alternative:</i></p> <ul style="list-style-type: none"> <li>• <i>LUC restricting residential or other sensitive land uses</i></li> <li>• <i>Operations and Maintenance, including soil management</i></li> <li>• <i>Cover</i></li> </ul>
<p><b>Sawmill and Sorter AOI – Groundwater</b></p> <p><i>Proposed Alternative:</i></p> <ul style="list-style-type: none"> <li>• <i>Natural Attenuation of Groundwater</i></li> <li>• <i>Operations and Maintenance Plan specifying groundwater monitoring requirements</i></li> <li>• <i>LUC restricting the use of groundwater</i></li> </ul>
<p><b>Greenhouse AOI – Groundwater</b></p> <p><i>Proposed Alternative:</i></p> <ul style="list-style-type: none"> <li>• <i>Natural Attenuation of Groundwater</i></li> <li>• <i>Operations and Maintenance Plan specifying groundwater monitoring requirements</i></li> <li>• <i>LUC restricting the use of groundwater</i></li> </ul>

Analysis as to whether or not project activities would:

- Create a significant hazard to the public or the environment throughout the routine transport, use or disposal of hazardous materials.

**Impact Analysis:**

The proposed RAP activities will include excavation of COCs impacted soil and off-site disposal and land use restrictions recorded in a LUC. Approximately 1,108 to 1,858 yds<sup>3</sup> of soil is planned for removal from six (6) AOIs.

Prior to the commencement of excavations, the contractor would submit waste profiling information to the landfills. Waste profiling will be based on a rate of sampling of 1 sample per 1,000 cubic yards. Non-hazardous waste soils will be transported to either Keller Canyon Landfill in Pittsburg or Hay Road Landfill in Vacaville. If any soils are determined to be a hazardous waste, these soils will be transported to a permitted hazardous waste disposal facility. Both Keller Canyon and Hay Road have sufficient capacity to accept all or part of this amount. If one facility were to accept all 1,108 to 1,858 yds<sup>3</sup> it would not significantly reduce overall capacity of the facility and therefore impacts related to capacity of landfill facilities would be less than significant.



Soils classified as California Hazardous Waste would be properly containerized and transported under hazardous waste manifests by registered hazardous waste haulers holding a currently valid registration issued by DTSC and meeting federal requirements imposed by the Department of Transportation (DOT) and the U.S. Environmental Protection Agency (USEPA) under Resource Conservation and Recovery Act (RCRA). Haulers are also subject to California hazardous waste law requirements pertaining to hauling of hazardous wastes (Health and Safety Code §25100 et seq. and §25163 et seq.; 22 OCR §66263.10 et seq.; 13 OCR §1160 et seq.; California Vehicle Code §12804 et seq. and §31300 et seq.), which are implemented and enforced by DTSC as well as the California Highway Patrol, Department of Motor Vehicles, local sheriff, and police agencies who have general responsibilities for the transportation of hazardous waste on state and local roadways. An Excavation Plan, submitted to DTSC for review and approval will detail methods and procedures for the excavation, storage, and loading of soil and include the following mitigation measures.

#### Mitigation Measures:

MM24: All stockpiles of excavated soils will be within fenced areas and covered with heavy duty polyethylene liners to prevent migration of contaminants, shield the material from elements, and mitigate fugitive dust and storm water run-on and runoff.

MM25: Temporary staging areas will be set up adjacent to excavations for soil stockpiling. Excavated material will be placed on plastic sheeting and covered by plastic sheeting to mitigate migration of affected soil, shield the material from elements, and mitigate fugitive dust and stormwater run-on and runoff.

MM26: Open bodied trucks shall be covered when used to transport soil. Trucks shall be brushed or washed down with water to removed soil on the truck and tires, after loading and prior to leaving the Site.

MM27: Visible soils carried onto Cypress Street and/or SR 1 via trucks, earth moving equipment, water, or other means shall be promptly removed.

#### Conclusion:

- ☐ Potentially Significant Impact
- ☒ Potentially Significant Unless Mitigated
- ☐ Less Than Significant Impact
- ☐ No Impact

- b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

#### Impact Analysis:

The proposed RAP includes BMPs designed to ensure that the potential for accidents and releases of pollutants are minimized to the greatest extent possible. All contractors will be responsible for operating in accordance with the most current Federal and California OSHA regulations, including Hazardous Waste Operations and Emergency Response, General Industry and Construction Safety Orders, and the Federal and Construction Industry Standards as described in California Code Regulations, Title 8, Sections 1539, 1541, and 5192 and 29 Code of Federal Regulations 1910.120, and 1926.

The Health and Safety Plan (HASP) will be prepared in accordance with current health and safety standards as specified by the Federal Occupational and Safety Health Administration (OSHA) and California OSHA and submitted to DTSC for approval prior to initiation of fieldwork. The provisions of the HASP are mandatory and must be reviewed by all personnel before working at the site. In the unlikely event of an accidental release of hazardous materials (dust) to the environment, various dust control measures will be implemented to control these potential releases. Access to the former Georgia-Pacific mill site is controlled through fencing and security. Public access to the site is

restricted and controlled through the Cypress Gate and on-site security personnel. Signs will be posted identifying the persons to contact in case of an emergency, questions or concerns.

#### Mitigation Measures:

MM28: Temporary staging areas will be set up adjacent to excavation areas for soil stockpiling. Excavated material be placed on plastic sheeting to stop migration of soil, shield the soil from the elements, and eliminate fugitive dust and storm water run-on and runoff.

MM29: Truck routes will be established in the Transportation plan to be submitted and approved by DTSC. Trucks will enter and exit the site at the Cypress Gate, travel on SR1 to SR20, then travel on SR20 to US101. Trucks will then travel south on US1010 and then continue to the disposal facility.

MM30: Coordinate with the local and state enforcement agencies, first responders, and Caltrans if emergency response is needed.

#### Conclusion:

- ☐ Potentially Significant Impact
- ☐ Potentially Significant Unless Mitigated
- ☒ Less Than Significant Impact
- ☐ No Impact

- c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste within one-quarter mile of an existing or proposed school.

#### Impact Analysis:

There is no school site located within one-quarter mile of the proposed project. The closest school to the excavation sites is Fort Bragg Middle school, located at 500 North Harold Street and approximately 0.8 mile from the project location. Activities and materials that may emit hazardous emissions or involve handling of hazardous substances include the proposed excavation activities and associated loading and transportation of excavated waste materials to an off-site permitted facility(ies) for disposal. Therefore, no hazardous substances or emissions associated with the proposed project are expected to result in exposure at a school site.

#### Conclusion:

- ☐ Potentially Significant Impact
- ☐ Potentially Significant Unless Mitigated
- ☐ Less Than Significant Impact
- ☒ No Impact

- d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to public or the environment.

#### Impact Analysis:

The proposed project is the remediation of the site listed as a hazardous materials site (Cortese List) pursuant to Government Code Section 65962.5. DTSC oversees the remediation of the former mill site, pursuant to regulatory authority granted under Chapter 6.8, Division 20 of the Health and Safety Code (H&SC). DTSC issued a Site Investigation and Remediation Order (Docket Number HAS-RAO 06-07-150) to Georgia-Pacific in 2007. The remediation of the Operable Unit C and D is a requirement of the Order.

There will be ongoing coordination and collaboration with the local and state enforcement agencies and Caltrans plus implementation of all BMPs contained within the proposed RAP, HASP, and the



Excavation Plan and Transportation Plans, which are to be submitted to DTSC for review and approval prior to the start of project implementation. Therefore, no impacts are expected to occur.

Conclusion:

- ☐ Potentially Significant Impact
- ☐ Potentially Significant Unless Mitigated
- ☐ Less Than Significant Impact
- ☒ No Impact

- e. Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan.

Impact Analysis:

The proposed RAP will not impair or interfere with the City's adopted Emergency Operation Plan (March 2010). There will also be ongoing coordination and collaboration with the local and state enforcement agencies and Caltrans. The proposed OU-C and OU-D RAP includes a HASP that will be implemented throughout the proposed remediation project. Both these plans identify measures to be followed during construction activities to ensure the health and safety of workers, public, and environment.

The proposed project site is localized and construction would occur over a short period of time, so cleanup of OU-C and OU-D will not impede or physically interfere with an adopted emergency plan or emergency evacuation plan. Therefore, no impacts are expected.

Conclusion:

- ☐ Potentially Significant Impact
- ☐ Potentially Significant Unless Mitigated
- ☐ Less Than Significant Impact
- ☒ No Impact

References Used:

1. DTSC, *Site Investigation and Remediation Order (Docket Number HAS-RAO 06-07-150)*, DTSC, February 16, 2007
2. ARCADIS, *Remedial Investigation, Operable Units C and D, Former Georgia-Pacific Wood Products Facility, Fort Bragg, California*, February 2011
3. ARCADIS, *Feasibility Study, Operable Units C and D, Former Georgia-Pacific Wood Products Facility, Fort Bragg, California*, January 2012
4. ARCADIS, *Second 2014 Semi-Annual Groundwater Monitoring Report, Former Georgia-Pacific Wood Products Facility, Fort Bragg, California. Prepared for Georgia-Pacific LLC. ARCADIS U.S., Inc.* December 2014
5. ARCADIS, *Draft Remedial Action Plan Operable Units C and D, Former Georgia-Pacific Wood Products Facility, Fort Bragg, California*, April 2015

## 9. Hydrology and Water Quality

Project Activities Likely to Create an Impact:

- Excavation of contaminated soils, stockpiles, backfilling, grading, and other construction activities.
- Stormwater runoff from excavated areas and stockpiles
- Remediation of contaminated groundwater through natural attenuation
- Restrictions on the domestic use of groundwater

### Description of Baseline Environmental Conditions:

The City of Fort Bragg is located in the North Coastal Basin of the North Coast Water Quality Control Board (NCRWQCB) region. The NCRWQCB covers all of Del Norte, Humboldt, Trinity, and Mendocino Counties, major portions of Siskiyou and Sonoma Counties, and small portions of Glenn, Lake, and Marin Counties.

The site is situated on a near-level, elevated, marine terrace, bordered to the west by steep ocean bluffs. The principal natural hydrological sources for the site are precipitation, surface runoff from adjacent lands, and stormwater discharge from the City. Most of the hydrological features at the site are manmade; the natural hydrology has been significantly changed by over a century of mill operation. Generally, monitoring data and topographic gradients demonstrate that onsite groundwater flow is primarily to the west-southwest toward the Pacific Ocean.

The Mill Site is located on a gently sloping terrace between 30 and 100 feet above mean sea level. The Fort Bragg area receives on average 40 inches of rainfall annually. The majority of the rainfall occurs during the wet season from the end of October to the end of April. The OU-C and OU-D areas are largely unpaved and drains to the northwest where surface runoff enters the former industrial Ponds 1 through 4, and into the former log pond (pond 8)..

No active water supply wells are located onsite. Georgia-Pacific obtains water for the Mill Site from a reservoir at Pudding Creek through an underground pipe system. Georgia-Pacific signed an agreement with the California Department of Fish and Game (DF&G), now known as the California Department of Fish and Wildlife, to protect migrating fish when using state waterways.

Groundwater contaminants including petroleum hydrocarbons, PCP, dioxins, atrazine, arsenic, and volatile organic compounds (VOCs) shall be remediated through Natural Attenuation with groundwater monitoring and Institutional Controls that restrict groundwater use. Removal of the source of groundwater contaminants, within the soil, is an element of groundwater remediation at three AOIs. The following AOIs require a groundwater remedial action.

- Parcel 2 AOI – Natural attenuation (NA) with monitoring and restrictions on the use of groundwater through a land use covenant (LUCs).
- Former AST AOI – Natural attenuation (NA) with monitoring and restrictions on the use of groundwater through a land use covenant (LUCs). Groundwater remediation also involves the removal of the source of groundwater contamination from the soil.
- Former MES/Pilot Study AOI – Natural attenuation (NA) with monitoring and restrictions on the use of groundwater through a land use covenant (LUCs). Groundwater remediation also involves the removal of the source of groundwater contamination from the soil.
- Former Dip Tank AOI – Natural attenuation (NA) with monitoring and restrictions on the use of groundwater through a land use covenant (LUCs). Groundwater remediation also involves the removal of the source of groundwater contamination from the soil.
- Former Planer #2 AOI (soil and groundwater) – Natural attenuation (NA) with monitoring and restrictions on the use of groundwater through a land use covenant (LUCs). Groundwater remediation also involves the removal of the source of groundwater contamination from the soil.
- Sawmill and Sorter AOI (groundwater) – Natural attenuation (NA) with monitoring and restrictions on the use of groundwater through a land use covenant (LUCs).
- Greenhouse AOI (groundwater) – Natural attenuation (NA) with monitoring and restrictions on the use of groundwater through a land use covenant (LUCs).

### Analysis as to whether or not project activities would:

- a. Violate any water quality standards or waste discharge requirements.



**Impact Analysis:**

Wastewater generated by the remedial activities at OU-C and OU-D are expected to be limited in scope and volume. Wastewater generated by the decontamination of field equipment would be placed in drums and tested. An off-site contractor would pick up the drums for treatment and disposal. Water for dust suppression and decontamination may be obtained from onsite sources such as Pond 5 or Pond 9 and Georgia-Pacific's water rights with DWR at Pudding Creek during flow times at the rate of 2.3 cubic feet per second (cfs). City water, taken from a hydrant is another possible source of water for dust suppression. Pudding Creek reservoir has an existing pump system that can fill the onsite Pond 5 if water is needed during low-flow times. Pudding Creek reservoir is filled by water pulled from the Noyo River at 1.3 cfs through an agreement with DF&G.

Although water would be used for dust control, the proposed construction work being conducted is during the dry season (Summer through October 31) so erosion control measures will be in place in accordance with the SWPPP for the closed GP Mill Site. The proposed project is not expected to generate any wastewater discharge. Therefore, the proposed project would not violate any water quality standards; no waste discharge requirements (WDRs) are required for the application of clean water for dust control.

The site is located in the jurisdiction of the North Coast Regional Water Quality Control Board, which implements and enforces applicable water quality standards and discharge requirements. The proposed project would not result in the discharge of wastewater that would require issuance of a National Pollutant Discharge Elimination System (NPDES) permit.

**Conclusion:**

- ☐ Potentially Significant Impact
- ☐ Potentially Significant Unless Mitigated
- ☐ Less Than Significant Impact
- ☒ No Impact

- b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted).

**Impact Analysis:**

The remedial activities at OU-C and OU-D would not extract or use groundwater or require excavation to the ground water table such that groundwater recharge or aquifer volume would be reduced. Therefore, this project would not be expected to result in a net deficit in aquifer volume or a lowering of the local groundwater table.

**Conclusion:**

- ☐ Potentially Significant Impact
- ☐ Potentially Significant Unless Mitigated
- ☐ Less Than Significant Impact
- ☒ No Impact

- c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on or off-site.

**Impact Analysis:**

Excavation of soil would not alter existing drainage patterns and all areas of excavation would be restored to preconstruction and surrounding grade and drainage patterns of the site or affect any streams. In addition, because stockpiled soils are temporary and would be removed prior to the start of the rainy season, they would not alter existing drainage patterns at the Georgia-Pacific Facility. If the proposed project stockpiles (clean and contaminated soils and waste) are still in place at the Project Site after the start of the rainy season Georgia-Pacific will follow the requirements established for stockpile management and stormwater control measures specified in the Storm Water Management Plan.

**Conclusion:**

- ☐ Potentially Significant Impact  
☐ Potentially Significant Unless Mitigated  
☐ Less Than Significant Impact  
☒ No Impact

- d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off-site.

**Impact Analysis:**

Remedial activities at OU-C and OU-D would not result in impacts on existing drainage patterns. No rivers or streams would be affected by this project and would not generate surface runoff or result in conditions where runoff rates would be accelerated. After remedial activities at these sites they will be restored to match the surrounding environment.

**Conclusion:**

- ☐ Potentially Significant Impact  
☐ Potentially Significant Unless Mitigated  
☐ Less Than Significant Impact  
☒ No Impact

- e. Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff.

**Impact Analysis:**

The Mill Site SWPPP would be amended to address the remediation project at OU-C and OU-D. The SWPPP would ensure appropriate management of stormwater runoff during excavation and removal of COCs at the sites. The SWPPP would include BMPs and monitoring provisions to ensure that stormwater does not result in the discharge of any hazardous substances remaining at the site, and the SWPPP would be implemented as part of the proposed project.

The State Water Resources Control Board (SWRCB) Construction General Permit for Storm Water Discharges Associated with Construction Activity (Order No. 2010-0014-DWQ) authorizes discharge of stormwater associated with construction activities, including clearing, grading, ground disturbances such as stockpiling, or excavation that results in soil disturbances of at least one acre of total land area. The area of soil disturbance for this project is less than one acre; however, stormwater BMPs shall be followed during the implementation of the project.

The SWPPP includes the following BMPs to control sediment in runoff:

- Occurrence of excavation activities shall be restricted to the non-rainy season.
- Use berms to divert runoff around exposed areas;



- Use other sediment control measures including filtration devices, barriers (e.g. fiber rolls, silt fences, straw bale barriers, gravel inlet filters, storm drain inlet protection, and gravel bag dikes) and settling devices (i.e., sediment traps) or other controls, as appropriate;
- Implement sediment control BMPs, including storm drain inlet protection, and be prepared with on-hand materials to implement sediment control measures in the event of predicted rain during the remainder of the year; and
- Inspect any stormwater drain in close proximity to any ongoing excavation activities on a daily basis for evidence of erosion causing settlement, blockage, or damage resulting in standing water.

Because the project would be implemented in accordance with the above requirements and authorizations, no aspect of the proposed activities would be expected to result in runoff that would exceed the capacity of storm water drainage systems or that would result in substantial addition of pollution to storm water.

Conclusion:

- ☐ Potentially Significant Impact  
☐ Potentially Significant Unless Mitigated  
☒ Less Than Significant Impact  
☐ No Impact

f. Otherwise substantially degrade water quality.

Impact Analysis:

The remediation project of OU-C and OU-D will not result in impacts on water quality. BMPs as described under 9e would be implemented for areas with excavated soil. The objective of the groundwater remedy is to improve groundwater quality (ARCADIS 2015). Therefore, this project will not be expected to have any adverse impacts on water quality. The proposed project would remove potential soil source(s) of groundwater contamination. There will be no impacts on surface waters of the State. Therefore, it would not result in degradation in water quality.

Conclusion:

- ☐ Potentially Significant Impact  
☐ Potentially Significant Unless Mitigated  
☐ Less Than Significant Impact  
☒ No Impact

g. Place within a 100-flood hazard area structures which would impede or redirect flood flows.

Impact Analysis:

According to the City of Fort Bragg, Flood Hazard Map (City of Fort Bragg, 1992), the OU-C and OU-D sites are not located within a 100-year flood plain and the cleanup does not include construction of any new structures.

Conclusion:

- ☐ Potentially Significant Impact  
☐ Potentially Significant Unless Mitigated  
☐ Less Than Significant Impact  
☒ No Impact

h. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam.

Impact Analysis:

The remediation project at OU-C and OU-D does not involve a dam, levee or other water impoundment that would potentially expose people or structures to a flooding risk. The proposed

action would not expose any people or structures to injury, death, or destruction due to flooding, including flooding as result of failure of a levee or dam.

Conclusion:

- ☐ Potentially Significant Impact
- ☐ Potentially Significant Unless Mitigated
- ☐ Less Than Significant Impact
- ☒ No Impact

i. Inundation by seiche, tsunami or mudflow.

Impact Analysis:

The remediation project at OU-C and OU-D are located on an uplifted marine layer and is not subject to inundation by seiche, tsunami, or mudflow.

Conclusion:

- ☐ Potentially Significant Impact
- ☐ Potentially Significant Unless Mitigated
- ☐ Less Than Significant Impact
- ☒ No Impact

References Used:

1. *ARCADIS, Remedial Investigation, Operable Units C and D, Former Georgia-Pacific Wood Products Facility, Fort Bragg, California, February 2011*
2. *California Emergency Management Agency, Tsunami Inundation Map for Emergency Planning, Fort Bragg Quadrangle*
3. *BBL Sciences, Stormwater Pollution Prevention Plan Georgia-Pacific Wood Products Manufacturing Facility, Fort Bragg, California, 2006*
4. *ARCADIS, draft Remedial Action Plan, Operable Unit C and D, 2015.*
5. *City of Fort Bragg, Flood Insurance Rate Map, Flood Hazard Map SF-2, Revised June 16, 1992*
6. *State Water Resources Control Board (SWRCB) Construction General Permit for Storm Water Discharges Associated with Construction Activity (Order No. 2010-0014-DWQ)*

## 10. Land Use and Planning

**Project Activities Likely to Create an Impact:** The proposed project is a cleanup project and does not propose a change in land use. Georgia-Pacific is proposing to implement the activities covered by the proposed RAP pursuant to the 2006 DTSC Order requiring remediation of the site (DTSC, 2006). A Land Use Covenant (LUC), restricting future sensitive land uses at approximately 24 acres within OU-C and OU-D is included as a remedy in the RAP. The LUC will restrict sensitive uses, such as residences, schools, and hospitals, unless special conditions identified in the LUC are met (ARCADIS, 2015). Additional detail regarding the soil and groundwater remedial actions, including the use of LUC is provided in Section 8, Hazardous Materials of this Initial Study.

**Description of Baseline Environmental Conditions:**

Analysis as to whether or not project activities would:

- a. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.

Impact Analysis:



The former Georgia-Pacific Mill Site is currently zoned Timber Resource/Industrial in the City of Fort Bragg's Coast General Plan. Timber Resource/Industrial would be acceptable at locations of the former Mill Site that are subject to the LUCs in the RAP. Although the proposed project includes implementation of an LUC to prohibit residential development, the proposed project would not change the zoning or conflict with any applicable land use plan or regulation.

Conclusion:

- ☐ Potentially Significant Impact
- ☐ Potentially Significant Unless Mitigated
- ☐ Less Than Significant Impact
- ☒ No Impact

- b. Conflict with any applicable habitat conservation plan or natural community conservation plan.

Impact Analysis:

The project site is not within a habitat conservation plan or a natural community conservation plan. Implementation of the proposed project would have no effect on an applicable habitat conservation plan or natural community conservation plan.

Conclusion:

- ☐ Potentially Significant Impact
- ☐ Potentially Significant Unless Mitigated
- ☐ Less Than Significant Impact
- ☒ No Impact

References Used:

1. ARCADIS, *Draft Remedial Action Plan Operable Units C and D, Former Georgia-Pacific Wood Products Facility, Fort Bragg, California, April 2015*
2. Department of Toxic Substances Control, *Site Investigation and Remediation Order (Docket Number HAS-RAO 06-07-150), February 16, 2007*
3. City of Fort Bragg, *Coastal General Plan, Map LU-1 Land Use Designations, Updated 2014*

## 11. Mineral Resources

**Project Activities Likely to Create an Impact:** NONE. The proposed project is not located in or near any known mineral resources. Therefore, no impacts to mineral resources would occur. For these reasons, no further analysis of impacts to this resource category is deemed necessary.

**Description of Baseline Environmental Conditions:**

Analysis as to whether or not project activities would:

- a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.

Impact Analysis:

Conclusion:

- ☐ Potentially Significant Impact
- ☐ Potentially Significant Unless Mitigated
- ☐ Less Than Significant Impact
- ☒ No Impact

- b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.

Impact Analysis:

Conclusion:

- ☐ Potentially Significant Impact  
☐ Potentially Significant Unless Mitigated  
☐ Less Than Significant Impact  
☒ No Impact

References Used:

1. *Mendocino County, General Plan, Mineral Resource Management Element, 2009*

## 12. Noise

Project Activities Likely to Create an Impact:

- Operation of heavy construction equipment (e.g. trucks, bulldozers, graders, excavators, etc) would increase noise levels during the 3 – 6 week construction period.
- Truck traffic during remedial activities at OU-C and OU-D and off-site hauling of excavated contaminated materials.
- Truck traffic during importation of clean soils.

Description of Baseline Environmental Conditions:

The site is designated as "Forest Products/Industrial". The heavy traffic conduit, SR 1, borders the eastern boundary of the site. An operational railroad locomotive line is located northeast of the site and can produce noise up to 80 decibels (dB) at 35 feet. The Pacific Ocean borders the site to the west and the Noyo River and Harbor areas border the south side of the site.

A commercial district borders SR 1 east of the site. During the excavation activities, additional traffic-related noise is anticipated, particularly in association with heavy-duty trucks transporting wastes for offsite disposal and excavating equipment. Noise-generating equipment would be used at the site that would affect noise levels in areas immediately near the work site. The equipment may include various pieces of earth moving equipment (front loaders, backhoes, tractors, compactors, and rollers), generators, and compressors. The noise levels for such equipment can often reach or exceed 85 dBA at a distance of 50 feet. The proposed excavations are located between 300 and 1,200 feet away from the nearest residential area.

The Fort Bragg General Plan identifies construction noise to reach unacceptable levels above 75dB. In addition, the General Plan also identifies ambient noise conditions in the vicinity of the project site at approximately 70dB at 50 feet indicating that ambient noise within the vicinity of the project area is already high.

Analysis as to whether or not project activities would result in:

- a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

Impact Analysis:

A commercial district borders SR 1 east of the site. Noise-generating equipment that would be used at the site, which would affect noise levels in areas near the work site, include various pieces of earth moving equipment (i.e., front loaders, backhoes, tractors, compactors, and rollers), generators, and compressors. The noise levels for such equipment can often reach or exceed 85 dBA at a distance of 50 feet. Noise from construction activities will be comply with the Noise Element of the City's General



Plan, Table N-5, (City of Fort Bragg, California, Noise Element, November 2012); therefore, the increase in ambient noise levels associated with construction of the proposed project is expected to be minimal and is considered less than significant.

Mitigation Measures:

MM31: Hours of operation shall be limited from 7:30 am to 5:00pm.

Conclusion:

- ☐ Potentially Significant Impact
- ☐ Potentially Significant Unless Mitigated
- ☒ Less Than Significant Impact
- ☐ No Impact

- b. Exposure of persons to or generation of excessive groundbourne vibration or groundbourne noise levels.

Impact Analysis:

Earth moving equipment (i.e. front loaders, backhoes, tractors, compactors, and rollers) would be used for the proposed remediation activities at OU-C and OU-D. Because vibrations associated with earth moving equipment would be localized the proposed project would not generate excessive ground borne vibrations or ground borne noise that would be noticeable to the nearest sensitive receptor located approximately 300 feet offsite. All construction activities will be in compliance with the City Noise Element Policy N-1.5, Table N-5.

Conclusion:

- ☐ Potentially Significant Impact
- ☐ Potentially Significant Unless Mitigated
- ☒ Less Than Significant Impact
- ☐ No Impact

- c. A substantial permanent increase in ambient noise levels in the vicinity above levels existing without the project.

Impact Analysis:

The proposed project is a short-term construction activity that will not last more than ten weeks; therefore, there will not be any permanent increase in ambient noise levels. As stated above, construction noise will comply with the Noise Element of the City's General Plan, Table N-5, (City of Fort Bragg, California, Noise Element, November 2012), including noise levels at the site property boundary. Additional noise attenuation will occur over the 300 feet between the edge of the property and the nearest sensitive receptor. Permanent impacts to ambient noise levels are not expected to result from implementation of the project.

Conclusion:

- ☐ Potentially Significant Impact
- ☐ Potentially Significant Unless Mitigated
- ☒ Less Than Significant Impact
- ☐ No Impact

- d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.

Impact Analysis:

Remedial activities at OU-C and OU-D will generate noise occur over an estimated four to six weeks. As stated above, construction noise will comply with the Noise Element of the City's General Plan,

Table N-5, (City of Fort Bragg, California, Noise Element, November 2012), including noise levels at the site property boundary. Additional noise attenuation will occur over the 300 feet between the edge of the property and the nearest sensitive receptor. While there will be temporary impacts to ambient noise levels, these impacts are not expected to be significant. There will no periodic increase in noise levels associated with the proposed project.

Conclusion:

- ☐ Potentially Significant Impact  
☐ Potentially Significant Unless Mitigated  
☒ Less Than Significant Impact  
☐ No Impact

References Used:

1. City of Fort Bragg, Coastal General Plan, Noise Element, 2012
2. ARCADIS, draft Remedial Action Plan, Operable Unit C and D, 2015

### 13. Population and Housing

**Project Activities Likely to Create an Impact:** NONE. The proposed project activities (e.g. staging, excavating, importing, stockpiling, decontamination, etc.) are all short term and would not induce workers to move into the area; therefore, there be need for additional housing. For this reason, no further analysis of impacts to this category is deemed necessary (City of Fort Bragg, 2014). Refer to Project Description section above for additional information.

Description of Baseline Environmental Conditions:

Analysis as to whether or not project activities would:

- a. Induce substantial population growth in area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).

**Impact Analysis:** The project will not result in any population growth.

Conclusion:

- ☐ Potentially Significant Impact  
☐ Potentially Significant Unless Mitigated  
☐ Less Than Significant Impact  
☒ No Impact

- b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere.

**Impact Analysis:** The project will not displace any housing.

Conclusion:

- ☐ Potentially Significant Impact  
☐ Potentially Significant Unless Mitigated  
☐ Less Than Significant Impact  
☒ No Impact

- c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.

**Impact Analysis:** The project will not displace any people residing in the area.



**Conclusion:**

- ☐ Potentially Significant Impact
- ☐ Potentially Significant Unless Mitigated
- ☐ Less Than Significant Impact
- ☒ No Impact

**References Used:**

1. *City of Fort Bragg, Coastal General Plan Housing Element, 2014*
2. *ARCADIS, draft Remedial Action Plan, Operable Unit C and D Remedial Action Plan, 2015*

**14. Public Services****Project Activities Likely to Create an Impact:**

- Transportation of contaminated soils and waste materials, storage, backfilling, and other construction activities.
- Importation of clean soils/backfill.

**Description of Baseline Environmental Conditions:**

The City, including the Georgia-Pacific Facility is served by the City Police Department (City of Fort Bragg 2008), the Fort Bragg Volunteer Fire Department (FBFD 2008), and the Mendocino County Sheriff (2008). The Mendocino Coastal District Hospital serves local residents, and there are five public schools in the City, covering kindergarten through 12<sup>th</sup> grade (City-Data.com 2008).

**Analysis as to whether or not project activities would:**

- a. Result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services:
  - Fire protection
  - Police protection
  - Schools
  - Parks
  - Other public facilities

**Impact Analysis:**

No demands for public services (i.e. police stations, fire stations, schools or parks) are anticipated to be required in order to implement the proposed project at the sites because the proposed project will consist of a continuation of the remediation of the site pursuant to the DTSC Order. Should activities result in an emergency at the site, there may be a need to dispatch emergency services (fire department, emergency medical services, and sheriff's department) to the site; however, given the small number of site workers expected to be present during the proposed project (estimated to be approximately eight workers) and the inclusion of an emergency response plan in the site-specific HASP. Excavation and removal of soil would not be expected to have an impact to the public services and other facilities serving the City and the surrounding communities.

The proposed remediation project will not require the need for additional governmental facilities (i.e., police stations, fire stations, schools, parks) to be built as a result of this project.

Conclusion:

- ☐ Potentially Significant Impact
- ☐ Potentially Significant Unless Mitigated
- ☐ Less Than Significant Impact
- ☒ No Impact

References Used:

1. ARCADIS, draft Remedial Action Plan, Operable Unit C and D Remedial Action Plan, 2015
2. City of Fort Bragg, Coastal General Plan, Housing Element, 2014.

## 15. Recreation

Project Activities Likely to Create an Impact: NONE.

**Description of Baseline Environmental Conditions:** The closest recreational sites are the Fort Bragg Coastal Trail located west of the former mill, MacKerricher State Park (Glass Beach) located north of the former mill, and Ocean Front Park located south of the former mill and at the mouth of Noyo Harbor. The northern portion of the Fort Bragg Coastal Trail opened in January 2015.

Analysis as to whether or not project activities would:

- a. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.

Impact Analysis:

Project activity sites OU-C and OU-D are not located on or in the vicinity of recreational facilities in the Fort Bragg area and proposed excavation activities are not expected to have any direct or indirect impact on recreational facilities.

Conclusion:

- ☐ Potentially Significant Impact
- ☐ Potentially Significant Unless Mitigated
- ☐ Less Than Significant Impact
- ☒ No Impact

- b. Include recreational facilities or require construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

Impact Analysis:

Project sites OU-C and OU-D are not located on or in the vicinity of recreational facilities in the Fort Bragg area and the proposed excavation activities are not expected to have any direct or indirect impact on recreational facilities.

Conclusion:

- ☐ Potentially Significant Impact
- ☐ Potentially Significant Unless Mitigated
- ☐ Less Than Significant Impact
- ☒ No Impact

References Used:

1. ARCADIS, draft Remedial Action Plan, Operable Unit C and D, 2015
2. City of Fort Bragg, Coastal General Plan, Conservation, Open Space, Energy, & Parks, 2008



## 16. Transportation and Traffic

### Project Activities Likely to Create an Impact:

- Transportation of contaminated soils, storage, backfilling, and other construction activities
- Importation of clean soils/backfill
- Construction worker vehicles

### Description of Baseline Environmental Conditions:

The City of Fort Bragg (City) is situated along State Route (SR) 1, which is called Main Street within the City. SR 1 is the only continuous north-south road serving the north coast of Mendocino County, California. It provides a local transportation corridor for many communities and is the primary access route for visitors. Traffic volumes on SR 1 have increased steadily over time.

Traffic into and out of the City is constrained by the capacity of two (2) bridges; Hare Creek and Pudding Creek, and by the two-lane roadway section along SR 1. Both Hare and Pudding Creek bridges are limited to one lane of traffic in each direction.

The most congested street in the City is Main Street (SR1) between the northbound merge area located just south of Laurel Street through Elm Street. The northbound section of this road currently operates at a level of service (LOS) D to LOS E during peak hours. The transportation routes for the proposed project will not travel on SR1 or in the most congested section of the City of Fort Bragg.

In 2010, the Average Daily Trip (ADT) for SR 1 between Maple Street and Oak Street was 10,720 and 25,600 south of South Street (Hexagon Transportation Planners, 2010). The proposed project would add approximately 25 daily trips round trips per day during construction.

Caltrans replaced the Noyo River Bridge in 2008 with a four (4) lane bridge, a center lane for emergency vehicles, and a sidewalk on both sides. The new bridge provides improved access at the south end of the City and to SR 20. Traffic is currently free flowing (LOS A) on SR 20.

Even though traffic volumes on Main Street has increased over the past few years, intersections with traffic signals at SR 20, Ocean View Drive, Cypress Street, Chestnut Street, Oak Street, Elm Street, and Redwood Avenue currently operate at LOS B or better. The side street stop sign controlled intersections with Main Street also operate at LOS B or better for traffic on Main Street; however, traffic turning onto Main Street from some side streets can experience LOS D, E, or F during peak hours.

The Fort Bragg General Plan indicates that the level of service (LOS) for SR 1 within the proposed project area generally operates at a level C (acceptable delays) at most intersections, with peak morning and afternoon traffic operating at a Level D (tolerable delays); although SR 1 at Elm Street currently operates at a LOS Level D. Currently, total traffic volume within the City operates a volume-to-capacity (V/C) ratio under 50 percent (Hexagon Transportation Consultants, 2010) indicating sufficient capacity on the streets within the project area.

State Route 20 (SR 20), beginning at State Highway 1 in Fort Bragg and continuing to Willets, is the main truck route from Fort Bragg to US Highway 101. SR 20 is classified as a Minor Arterial and US Highway 101 is the only Major Arterial in Mendocino County. Trucks leaving the Mill Site would travel on SR 20 to Willets and US Highway 101 (Mendocino County, Circulation Element, 2009).

### Analysis as to whether or not project activities would:

- a. Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections).

**Impact Analysis:**

The proposed project would require between 60 and 90 trucks to haul excavated soil from the site for transport to an approved off-site disposal area. An additional 60 to 90 trucks would be required to bring in clean, fill material. This would increase traffic on local streets by approximately 25 trucks per day over the two to six week phased construction period. This is based on excavation of between 1,108 and 1,858 yds<sup>3</sup> of contaminated soil from five excavation sites and use of heavy-duty diesel trucks with a capacity to hold approximately 18 yds<sup>3</sup> of soil each.

Trucks would leave the site via Main Street (SR 1) to access State Route (SR) 20 and then U.S. Highway 101. This haul route would avoid residential areas, schools, and playgrounds. Truck drivers would be provided a map of the site and haul routes to ensure that the designated route is followed.

Trucks would start arriving on site at 7 a.m. and would typically depart no later than 1 p.m. in order to arrive at the permitted landfill facilities before closing. The 7 a.m. arrival time and early departure time would avoid both the morning and afternoon traffic peaks. Operations would occur from Monday through Saturday. Soil and waste would be transported to either Keller Canyon Landfill in Pittsburg, CA or Hay Road Landfill in Vacaville, CA, or another facility permitted to accept the soil.

Construction will be conducted by approximately eight workers; all of whom are expected to drive themselves to and from the site independently every day.

Project related traffic would be short-term in nature and limited in scope. Current Level of Service for the transportation route is LOS B and the V/C ratio for this area is identified at approximately 0.61 – 0.70 indicating that it is at an acceptable volume-to-ratio capacity. Additionally, truck traffic is expected to avoid both morning and afternoon traffic peaks. Project related traffic is expected to have a less than significant impact on existing traffic and circulation patterns in the City and surrounding areas, and the increase in traffic is not expected to be substantial in relation to the existing traffic load and/or capacity of the street system.

**Conclusion:**

- ☐ Potentially Significant Impact  
☐ Potentially Significant Unless Mitigated  
☒ Less Than Significant Impact  
☐ No Impact

- b. Exceed, either individually or cumulatively, a level of service standard established by the country congestion management agency for designated roads or highway.

**Impact Analysis:**

According to the 2014 Inland General Plan, Circulation Element, Table C-4, the Cypress/State Route 1 (Main Street) intersection operates at a LOS B. The average delay is 13.1 seconds at PM Peak Hour. The Main Street and SR 20 intersection has an LOS of B and a delay of 22.5 seconds. The project would involve approximately 25 round trips per day using SR 1 to off-haul excavated contaminated materials from the Site. Truck trips would occur between 7am and 1pm. The haul routes for the project are signal controlled and would not result in a reduction of the level of service within the project area. Refer to section 16a for details on LOS and ADT for SR1.

**Conclusion:**

- ☐ Potentially Significant Impact  
☐ Potentially Significant Unless Mitigated  
☒ Less Than Significant Impact  
☐ No Impact



- c. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

Impact Analysis:

Currently, no hazardous design features exist on SR 1 between the Site and SR 20. Major intersections along this section of the transportation route are controlled by traffic signals. While an approximately 30 mile section of SR 20 is curvy and may require some slowing, heavy trucks can negotiate these curves at the posted traffic speed. This route is frequently traveled by trucks and no increase in hazards is expected.

Conclusion:

- ☐ Potentially Significant Impact  
☐ Potentially Significant Unless Mitigated  
☐ Less Than Significant Impact  
☒ No Impact

- d. Result in inadequate emergency access.

Impact Analysis:

The Site has three entrances (Cypress Street as the main entrance and West Redwood Ave and Elm Street as alternate entrances) and has more than one existing road onsite; therefore, the project site has more than adequate access in the event of an emergency. The existing road network at the site allows multiple emergency vehicle access to the entire site in the event of an emergency.

Conclusion:

- ☐ Potentially Significant Impact  
☐ Potentially Significant Unless Mitigated  
☐ Less Than Significant Impact  
☒ No Impact

- e. Result in inadequate parking capacity.

Impact Analysis:

Sufficient parking for heavy-duty trucks and construction equipment would be made available onsite. Construction worker vehicles would likely be parked in the former employee lot(s) or in vacant areas of the Site in the vicinity of the work areas and is, therefore, not expected to impact parking at or near the site.

Conclusion:

- ☐ Potentially Significant Impact  
☐ Potentially Significant Unless Mitigated  
☐ Less Than Significant Impact  
☒ No Impact

- f. Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks).

Impact Analysis:

The majority of traffic would be heavy-duty trucks and personal vehicles. Other forms of transportation (rail or air traffic) and facilities such as bus turnouts would not be affected by the proposed project. There will be ongoing coordination and collaboration with the City.

Conclusion:

- ☐ Potentially Significant Impact

- ☐ Potentially Significant Unless Mitigated  
☐ Less Than Significant Impact  
☒ No Impact

*References Used:*

1. *ARCADIS, draft Remedial Action Plan, Operable Unit C and D, 2015*
2. *City of Fort Bragg, Coastal General Plan, Circulation Element, updated 2014*
3. *City of Fort Bragg, Inland General Plan, Circulation Element, updated 2014*
4. *Hexagon Traffic Consultants, Fort Bragg Specific Plan, Revised Transportation Analysis, 2010*
5. *Mendocino County, General Plan, Circulation Element, 2009*
6. *Whitlock & Weinberger Transportation, Inc., Boatyard Center Phase II Development Traffic Impact Study, 2002*

## 17. Utilities and Service Systems

**Project Activities Likely to Create an Impact:**

- Possible rerouting or in-place protection of utility lines will be conducted during excavation activities at OU-C and OU-D.

**Description of Baseline Environmental Conditions:**

The locations and distribution of major underground utilities including stormwater, electrical lines, drainage, sanitary sewer, potable water, and fire protection lines in the vicinity of OU-C and OU-D were documented in 2010. However, an updated utility clearance would be conducted in advance of excavation activities.

**Analysis as to whether or not project activities would:**

- a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board.

**Impact Analysis:**

Little or no wastewater is expected to be generated by the project. Therefore, no wastewater treatment requirements would be exceeded.

**Conclusion:**

- ☐ Potentially Significant Impact  
☐ Potentially Significant Unless Mitigated  
☐ Less Than Significant Impact  
☒ No Impact

- b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

**Impact Analysis:**

The proposed project includes excavation and removal of contaminated fill material and/or soil followed by backfill, compaction, and grading of the excavations. Only a limited amount of water would be used for dust suppression and equipment decontamination during construction activities with a sufficient amount coming from Pond 5 (some of which are connected to the Pudding Creek Reservoir which is controlled by Georgia-Pacific). Therefore, no new construction or expansion of the City's existing wastewater treatment facility will be required.

**Conclusion:**

- ☐ Potentially Significant Impact  
☐ Potentially Significant Unless Mitigated



- ☐ Less Than Significant Impact  
☒ No Impact

- c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

Impact Analysis:

The proposed project is the excavation and off-site disposal of contaminated soil for a short period of time. Therefore, no new stormwater drainage facilities or expansion of existing facilities is required. Refer to response 17b above for additional information.

Conclusion:

- ☐ Potentially Significant Impact  
☐ Potentially Significant Unless Mitigated  
☐ Less Than Significant Impact  
☒ No Impact

- d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed.

Impact Analysis:

The proposed project would require minor water supply for dust control during construction activities. A sufficient quantity of water is available from on-site Pond 5 for dust suppression. Therefore, the project would not require new or expanded water entitlements.

Conclusion:

- ☐ Potentially Significant Impact  
☐ Potentially Significant Unless Mitigated  
☐ Less Than Significant Impact  
☒ No Impact

- e. Result in determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the projects projected demand in addition to the providers existing commitments.

Impact Analysis:

The proposed project includes excavation and removal of contaminated fill material and/or soil followed by backfill, compaction, and grading of the excavations. Waste wastewater might be generated through dewatering of excavated soil. However, the wastewater will not be sent to the treatment facility; therefore, the project will have no effect on existing systems (ARCADIS, 2015).

Conclusion:

- ☐ Potentially Significant Impact  
☐ Potentially Significant Unless Mitigated  
☐ Less Than Significant Impact  
☒ No Impact

- f. Be served by a landfill with sufficient permitted capacity to accommodate the projects solid waste disposal needs.

Impact Analysis:

☒ The proposed project COULD HAVE a significant effect on the environment. However, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A **Mitigated Negative Declaration** will be prepared.

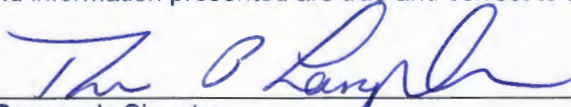
☐ The proposed project MAY HAVE a significant effect on the environment. An **Environmental Impact Report** is required.

☐ The proposed project MAY HAVE a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An **Environmental Impact Report** is required, but it must analyze only the effects that remain to be addressed.

☐ The proposed project COULD HAVE a significant effect on the environment. However, all potentially significant effects (a) have been analyzed adequately in an earlier Environmental Impact Report or Negative Declaration pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier Environmental Impact Report or Negative Declaration, including revisions or mitigation measures that are imposed upon the proposed project. Therefore, nothing further is required.

### Certification:

I hereby certify that the statements furnished above and in the attached exhibits, present the data and information required for this initial study evaluation to the best of my ability and that the facts, statements and information presented are true and correct to the best of my knowledge and belief.

  
Preparer's Signature

June 2, 2015  
Date

Thomas P. Lanphar  
Preparer's Name

Sr. Environmental Scientist  
Preparer's Title

(510) 540-3776  
Phone #

  
Unit Chief Signature

June 2, 2015  
Date

Denise Tsuji  
Unit Chief Name

Supervising Environmental Scientist  
Unit Chief Title

(510) 540-3824  
Phone #



## ATTACHMENT A

## REFERENCES

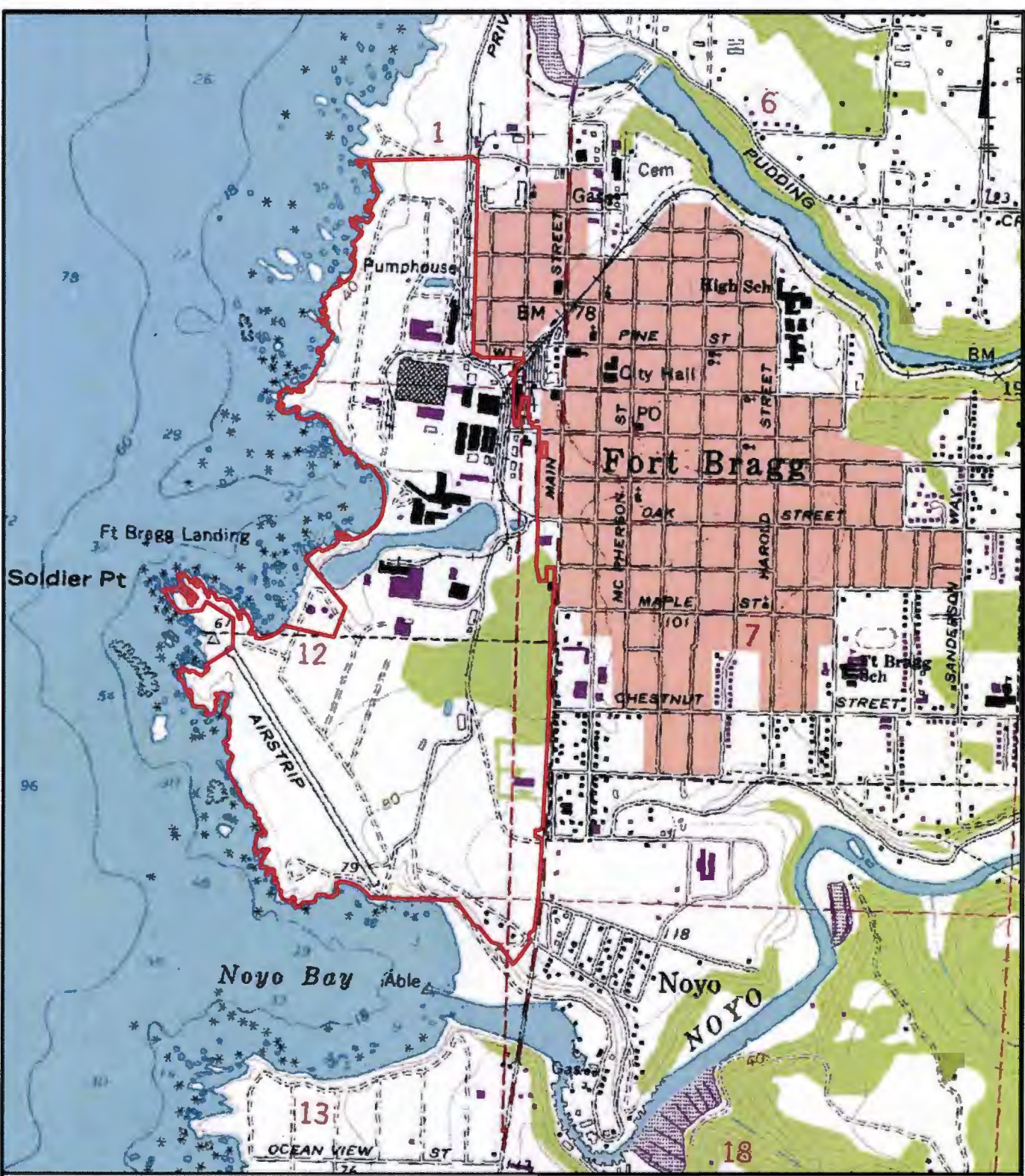
1. AME, *Work Plan for Additional Site Assessment*, Georgia-Pacific California Wood Products Manufacturing Facility, 90 West Redwood Avenue, Fort Bragg, California, 2005
2. ARCADIS, *Remedial Investigation, Operable Units C and D*, Former Georgia-Pacific Wood Products Facility, Fort Bragg, California, February 2011
3. ARCADIS, *Feasibility Study, Operable Units C and D*, Former Georgia-Pacific Wood Products Facility, Fort Bragg, California, January 2012
4. ARCADIS, *Second 2014 Semi-Annual Groundwater Monitoring Report*, Former Georgia-Pacific Wood Products Facility, Fort Bragg, California. Prepared for Georgia-Pacific LLC. ARCADIS U.S., Inc. December 2014
5. ARCADIS, *Draft Remedial Action Plan Operable Units C and D*, Former Georgia-Pacific Wood Products Facility, Fort Bragg, California, April 2015
6. ARCADIS BBL, *Remedial Action Plan Operable Unit A*, Former Georgia-Pacific Wood Products Facility, Fort Bragg, California, August 2008
7. Bay Area Air Quality Management District (BAAQMD), *CEQA Air Quality Guidelines*, May 2011
8. BAAQMD, *Proposed Air Quality CEQA Thresholds of Significance*, December 7, 2009
9. BBL Sciences, *Stormwater Pollution Prevention Plan Georgia-Pacific Wood Products Manufacturing Facility*, Fort Bragg, California, 2006
10. Biosearch, *Red-legged frog Identification*, Georgia-Pacific Fort Bragg Facility, Mendocino County California, 2010
11. Brunsing Associates, Inc., *Engineering Geologic Reconnaissance Report*, 2004
12. California Emergency Management Agency, *Tsunami Inundation Map for Emergency Planning*, Fort Bragg Quadrangle, no date
13. City of Fort Bragg, *Flood Insurance Rate Map*, Revised June 16, 1992
14. City of Fort Bragg, *Coastal General Plan, Conservation, Open Space, Energy, & Parks Element*, 2008
15. City of Fort Bragg, *Coastal General Plan, Public Facilities Element*, 2008
16. City of Fort Bragg, *Emergency Operation Plan*, March 2010
17. City of Fort Bragg *Coastal General Plan, Circulation Element*, 2014
18. City of Fort Bragg, *Coastal General Plan, Housing Element*, 2014.
19. City of Fort Bragg *Coastal General Plan, Noise Element*, 2012
20. City of Fort Bragg *Coastal General Plan, Circulation Element*, 2014
21. City of Fort Bragg, *Coastal General Plan, Map LU-1 Land Use Designations*, 2014
22. City of Fort Bragg *Inland General Plan, Circulation Element*, 2014
23. City of Fort Bragg, *Municipal Code Section 18.62.060*
24. City of Fort Bragg and Sherwood Valley Band of Pomo Indians, *Monitor Agreement for the Fort Bragg Coastal Trail Project*, April 9, 2014
25. Department of Toxic Substances Control, *Site Investigation and Remediation Order* (Docket Number HAS-RAO 06-07-150), February 16, 2007
26. Garcia and Associates, *Archeological Extended Phase I Studies Within the Northern Portion of the Georgia-Pacific Corporation Property*, Fort Bragg, Mendocino, March 2010
27. Mendocino County, *General Plan, Circulation Element*, 2009
28. Mendocino County, *General Plan, Mineral Resource Management Element*, 2009
29. Mendocino County Air Quality Control District (MCAQMD), *Air Pollution Control Rules*, 2005
30. MCAQMD, *Particulate Attainment Plan*, 2005
31. MCAQMD, *Memorandum CEQA Criteria and GHG Pollutant Thresholds*. June 3, 2010.

32. *National Resource Conservation Service, Soil Survey for Mendocino County, Western Part, 2002.*
33. *Sherwood Valley Band of Pomo Indians, letters to Thomas Lanphar, dated April 9, 2014.*
34. *State Water Resources Control Board (SWRCB) Construction General Permit for Storm Water Discharges Associated with Construction Activity (Order No. 2010-0014-DWQ)*
35. *Teresa Sholars, Botanical Survey for the Georgia-Pacific Mill Site Bluffs, 2005*
36. *TRC, Phase II Determination of Significant Standing Structures Georgia Pacific Lumber Mill Fort Bragg, California, undated*
37. *TRC, Archaeological Survey of the Georgia Pacific Lumber Mill Fort Bragg, California, 2003*
38. *TRC, Site Specific Treatment Plan for Cultural Resources, Georgia Pacific Lumber Mill, Fort Bragg, California – Draft, 2006*
39. *Van Bueren, Historic Property Survey Report and Findings of Effect for the Fort Bragg Coastal Trail Project in the City of Fort Bragg, California, July 30, 2010*
40. *Whitlock & Weinberger Transportation, Inc., Boatyard Center Phase II Development Traffic Impact Study, 2002*
41. *WRA Environmental Consultants, Delineation of Potential Section 404 Jurisdictional Waters and Waters, 2005*
42. *WRA Environmental Consultants, Avian Habitat Utilization and Impact Assessment, 2006*
43. *WRA Environmental Consultants, Biological Assessment, 2005; updated 2007*



ATTACHMENT B  
FIGURES

CITY: Highlands Ranch DIV/GROUP: AIT GIS DB: Brianna Griffith  
 Project # B0066142.0003.00002  
 Path: I:\FortBragg\MXD\GWMR\30TR12\Fig 1-1 SiteLocation.mxd Date: 11/20/2012 Time: 8:47:18 AM



**LEGEND:**

SITE BOUNDARY

0                      1,400                      2,800

Feet

GRAPHIC SCALE

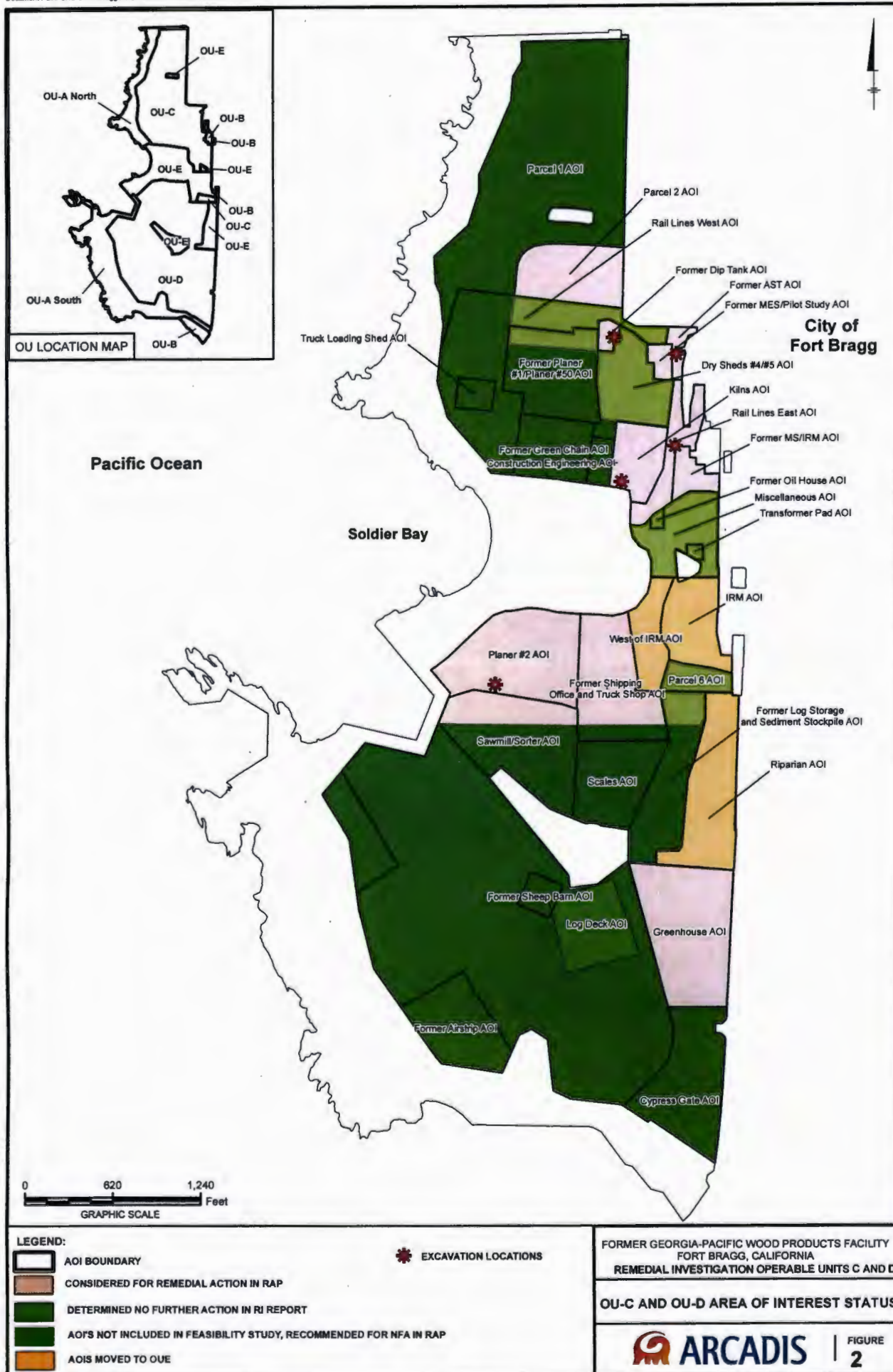
FORMER GEORGIA-PACIFIC WOOD PRODUCTS FACILITY  
 FORT BRAGG, CALIFORNIA

**SITE LOCATION MAP**

**FIGURE**

**1**





ATTACHMENT C  
MEMORANDUM OF UNDERSTANDING



**MEMORANDUM OF UNDERSTANDING  
BETWEEN THE CITY OF FORT BRAGG, CALIFORNIA  
AND THE SHERWOOD VALLEY BAND OF POMO INDIANS**

This Memorandum of Understanding ("Agreement") is entered into this 28<sup>th</sup> day of May 2014, between the City of Fort Bragg, a municipal corporation located in the County of Mendocino, California ("City"); and the Sherwood Valley Band of Pomo Indians, a federally recognized Indian tribe ("Tribe") (each, a "Party", and collectively referred to as the "Parties").

**WHEREAS**, the Sherwood Valley Band of Pomo Indians has knowledge of village sites, burials, ancestral and ceremonial grounds throughout its aboriginal territory;

**WHEREAS**, the City of Fort Bragg has regulatory authority over discretionary development within its jurisdiction;

**WHEREAS**, Senate Bill 18 (SB 18) adopted in 2004 requires local governments to contact and consult with Native American tribes regarding General Plan, Specific Plans and the designation of open space;

**WHEREAS**, the City recognizes the importance of protecting cultural resources and will incorporate feasible mitigation, including avoidance, as required under CEQA, while conducting City construction projects and other ground disturbing activities that have the potential to impact Native American cultural resources;

**WHEREAS**, the City recognizes the importance of protecting cultural resources and will incorporate feasible mitigation, including avoidance, as required under CEQA, while considering permit applications that allow individuals to undertake private or public construction projects and other ground disturbing activities that have the potential to impact Native American cultural resources;

**WHEREAS**, the Tribe wants to receive and review project information, engage in consultation on projects, and ensure that construction projects and other ground disturbing activities that have the potential to impact Native American cultural resources are monitored by Native American monitors;

**WHEREAS**, the City and the Tribe recognize that each is a governmental entity with responsibility for the health and general welfare of its people;

**WHEREAS**, the City and the Tribe seek to work with each other to develop a cooperative, streamlined process for consultation;

**WHEREAS**, the City supports the Tribe's desire to consult and work cooperatively to protect, mitigate, and manage archaeological sites, traditional cultural properties, and cultural resources, identified on City property and located within the jurisdiction of the City;

**WHEREAS**, Tribal members engage in ongoing collection and use of cultural biological resources (both flora and fauna and their habitats) and have with certain cultural landscapes within the City limits; and

**WHEREAS**, the City is supportive of the Tribe's desire to access and steward their cultural resources and places;

**NOW, THEREFORE, BE IT AGREED BY THE CITY AND THE TRIBE AS FOLLOWS:**

1. **Purpose and Objectives.** The purpose of this Agreement is to establish protocols to: guide consultation between the City and the Tribe; guide the cultural resource review process between the City and the Tribe including but not limited to the California Environmental Quality Act (CEQA) planning and project implementation phases, especially with regard to mitigation measures and monitoring requirements under CEQA; and identify procedures for the treatment of Native American cultural resources.

2. **Definitions.** The following terms have the respective meanings set forth below. Terms listed in singular form may be considered to include the plural form of each word and vice versa except where the context clearly indicates otherwise.

- a. "Consultation" means the meaningful and timely process of seeking, discussing, and considering carefully the views of other participants, and, where feasible, reaching agreements as early in the process as possible. Consultation is undertaken to 1) understand and consider the effects of certain planning or discretionary projects, on cultural resources; 2) revise plans or discretionary projects as feasible to avoid or minimize impacts; and 3) mitigate impacts where avoidance is infeasible. Consultation is a process of communication that may include written correspondence, meetings, telephone conferences, site visits, and e-mails.
- b. "Cultural Resource" means any artifacts, features, human remains (including articulated or unarticulated bones and/or bone fragments, and the surrounding soil matrix at any stage of decomposition of any deceased human) or traditional cultural properties with archaeological ceremonial, cultural, sacred or traditional value to the Tribe.
- c. "Project" means a discretionary activity which requires environmental review under CEQA or NEPA; and/or the adoption of any amendment to the general plan, adoption of any specific plan or designation of land as open space pursuant to SB 18.
- d. "Formal Communication" means authorized written communication intended to represent the official position of one Party to the other. Only written communications from the Tribal Chairman, Vice-Chairman or Tribal Administrator of the Sherwood Valley Band of Pomo Indians and the Mayor, City Manager or Community Development Director of the City of Fort Bragg shall be deemed authorized communication of each respectively.

3. **Cultural Affiliation.** The Parties agree that the Tribe has traditionally occupied, and is historically traced to, the City of Fort Bragg, in Mendocino County, California, its sphere of influence, and beyond. Furthermore, the City of Fort Bragg lies within the historic boundaries of SVBP's ancestral lands, and the historic boundaries of the Mendocino Indian Reservation which included tribal members from many different tribes. Thus, cultural resources from pre-contact and post-contact, found within the City of Fort Bragg, from historic times may be related to SVBP or other tribal communities currently located within Mendocino County.

4. **Most Likely Descendant.** In the event that Native American human remains, associated funerary objects, sacred objects, and/or objects of cultural patrimony are found during a project, the Parties understand that a determination of the Most Likely Descendant (MLD), as described in California Public Resources Code section 5097.98, will be made by the NAHC upon notification to the NAHC of discovery of any such remains at a project site.

5. **Points of Contact.** The points of contact (POC) of the Parties with respect to this Agreement shall be as follows:



Sherwood Valley Band of Pomo Indians  
190 Sherwood Hill Drive  
Willits, California 95490

Official Governmental POC:

Tribal Chairman  
Michael Fitzgerald  
Phone: (707) 459-9690  
Email: svrchairman@yahoo.com

Technical POC:

Tribal Historic Preservation Officer (THPO)  
Hillary Renick  
Phone: (707) 459-9690  
Email: chishkinmen@gmail.com

Alternate POC:

Tribal Administrator  
Scarlett Carmona  
Phone: (707) 459-9690  
Email: svradministrator@sbcglobal.net

City of Fort Bragg  
416 N Franklin Street  
Fort Bragg, CA 95437

Official Governmental POC:

Mayor  
Dave Turner  
Phone: (707) 964-3356  
Email: dturner@fortbragg.com

Technical POC:

City Manager  
Linda Ruffing  
Phone: 707-961-2823  
Email: lruffing@fortbragg.com

Alternate POC:

Community Development Director  
Marie Jones  
Phone: 707-961-1807  
Email: mjones@fortbragg.com

- a. All formal communications from the City to the Tribe should be directed to the Chairman by U.S. mail, with an electronic copy of the communication provided to the Chairman, Technical POC, and Alternate POC by email. Only the Chairman shall have authority to enter into, administer, and/or terminate any binding agreements and make related determinations and findings, unless otherwise delegated by a duly executed resolution of the Sherwood Valley Band of Pomo Indians Tribal Council.
- b. All formal communications from the Tribe to the City should be directed to the City Manager by US mail, with an electronic copy of the communication provided to the Technical POC by

email. Only the City Manager shall have authority to enter into, administer, and/or terminate any binding agreements and make related determinations and findings as authorized by City Council through resolution.

- c. The Parties may change their respective POC at any time by providing the other Party with the name of the new POC in writing and email. The Parties shall notify the other of any change in contact information within seventy-two (72) hours of the change in writing and email.
- d. Nothing in this Agreement precludes the Parties from designating other authorized POC to work on varying projects provided the Party notifies the other of such election in a formal written communication, with a courtesy email sent to all above POC for the other Party.

6. **Communication and Consultation Protocols.** In order to successfully avoid, minimize or mitigate against impacts to Native American cultural resources, the Parties agree that consultation shall occur as early in the planning process as possible within reasonable timeframes and in good faith. Consultation shall proceed as follow:

- a. Consultation must proceed in a timely manner so that the City can meet its legal obligations with regard to permit and CEQA review timelines.
- b. Issues that require consultation should be identified as soon as possible in order to involve both Parties early on in the process.
- c. The City shall provide a "Request for Comments" and/or notification to the Tribe's technical POC and the Tribal Chairman, for all projects subject to environmental review under CEQA or NEPA as early as possible to: 1) provide information about the project ; 2) provide an opportunity for the Tribe to identify cultural resources and specific locations of concern; and 3) identify the potential for impacts to cultural resources.
- d. For projects requiring consultation under SB 18 or CEQA, in addition to the information provided pursuant to Paragraph 7(c) above, the City shall provide the Tribe with a Notice of Preparation indicating the type of project and the type of environmental document to be prepared and soliciting initial comments from the Tribe regarding but not limited to the following:
  - i. The choice and content of the environmental documents to be prepared (scoping phase);
  - ii. The proposed area of potential effects within which the project may directly or indirectly cause alteration in the character or use of cultural resources;
  - iii. The data and/or research needs; and
  - iv. Identification of known cultural resources.
- e. Consultation can be initiated by either Party. As a general rule for this Agreement, any City decision or action which would cause significant impacts to an archaeological site, burials, human remains or traditional cultural property should include consultation with the Tribe, as required by CEQA. Early involvement of all Parties will ensure sufficient time for input as decisions are made.



- f. The Tribe should generally be provided a minimum of thirty (30) days within which to respond to a request for comments and complete consultation, unless a longer timeframe is required by law or has been requested by the Tribe and agreed to by the Parties.
- g. The Tribe shall respond to notifications in a timely manner. If the Tribe fails to respond to a Request for Comments within the required timeframe (see 6.f.), the City may proceed with the project without consultation unless otherwise required by law. The Tribe may provide input into the planning process up to the time of the public hearing and that information will be transmitted to the hearing body.
- h. Both Parties shall adhere to the timelines for the dissemination and review of the various notices and reports provided for by law and delineated within CEQA, CEQA Guidelines, and SB 18.
- i. The Parties agree that oral agreements do not produce a contract and is not legally binding on the Parties unless and until such representation is ratified in writing by an authorized government official of each Party pursuant to Paragraph 5.a and 5.b above.

7. **Native American Cultural Resources Treatment Protocols.** In order to successfully avoid, minimize or mitigate against impacts to Native American cultural resources, the Parties agree as follow with regard to private and public sector projects that are seeking Planning Commission or City Council approvals:

- a. The City and the Tribe shall promote avoidance and non-disturbance measures as the preferred treatment of cultural resources where feasible. If avoidance is not feasible, the City shall consult with the Tribe to minimize and mitigate impacts of a potential undertaking to cultural resources. In cases where agreement cannot be reached within the statutorily required timeframe for the preparation of the CEQA document, as Lead Agency, the City shall define the avoidance/mitigation strategy.
- b. Where cultural resources may be reasonably expected to be located within or adjacent to a project area, the City shall require an archaeological assessment, by a qualified archeologist to determine the presence, extent, and significance of cultural resources within the project area. Archaeologists hired to conduct archaeological investigations must meet the Secretary of the Interior's Professional Qualifications Standards.
  - i. The assessment shall include a NAIIC, California Historical Resources Information System (CHRIS) and local historical records search, a Phase I archaeological survey, and preparation of an archeological report containing the results of this assessment. A copy of the archaeological report shall be mailed to the Tribal Chairman. The Tribe shall have thirty (30) days to comment on the all resultant Phase I archaeological reports and request further consultation. During Phase I archaeological assessments, the Parties agree that features shall not be excavated and artifacts shall not be collected. If resources are identified in the assessment, a copy of the archaeological report shall also be mailed to the State Historical Preservation Officer (SHPO) and CHRIS at Sonoma State University.
  - ii. Phase II archeological evaluations will be required by the City if recommended in the Phase I assessment. If a Phase II or further archaeological evaluation is recommended, a qualified professional archeologist will prepare a field collection

strategy, artifact processing and analysis guidelines, and a detailed treatment/disposition plan, in consultation with the THPO, prior to the commencement of any fieldwork that will result in the collection of artifacts. The archaeologist shall provide the Tribal Chairman with a proposed testing plan and the Tribal Chairman shall provide comments on the plan within fifteen (15) days of receipt of the proposed testing plan. The THPO and Tribal Chairman shall have thirty (30) days to comment on all resultant Phase II archaeological report and request further consultation. During Phase II archaeological assessments, native soils may be excavated, but artifacts shall not be collected. If excavations are to occur, the City shall uphold the Tribe's right to require the presence of a Tribal monitor during such activity pursuant to a tribal monitor agreement agreed upon by the parties.

- iii. Should at any time, archaeological material be collected with the prior written consent of the Tribe, the City acknowledges the Tribe's preference that all collected archaeological material be studied for the shortest feasible amount of time, with a maximum of one year.
- iv. The City acknowledges and agrees to uphold to the extent permitted by law, that it is the Tribe's preference to have temporarily collected materials, subsequently reburied in proximity to the materials' original interment location, as feasible, in an area where the materials shall not be subject to future ground disturbance.
- c. Project applicants that conduct ground disturbing activities within a project area prior to obtaining the proper permits and clearances will be ordered to stop work and appropriate action, including but not limited to criminal prosecution, will be taken in accordance with applicable law.

**8. Native American Cultural Resources Treatment Protocols.** In order to successfully avoid, minimize or mitigate against impacts to Native American cultural resources, the Parties agree as follow with regard to City projects, where a CEQA document requires Tribal Monitoring:

- a. The City will allow the Tribe to monitor native ground disturbing activities on projects where cultural resources may be reasonably expected to be located. If a tribal monitor agreement has been agreed upon by the parties, it shall be followed.
- b. The City agrees to transfer ownership of Native American cultural resources that are found on City property through implementation of a Data Collection Plan or through monitoring of a construction project to the appropriate Native American Tribe for proper treatment and disposition, if requested by the Tribe, unless otherwise required by law.

**9.** The City shall send to the Tribal Chairman all public draft, amended, supplemental and final environmental documents prepared for a project that will have impacts to cultural resources, including but not limited to Initial Studies, Negative Declarations, Mitigated Negative Declarations, and Environmental Impact Reports. These should at minimum include the following:

- i. Cultural resource data collection/analysis methodologies and significance;
- ii. Potential effects/impacts upon identified cultural/natural resources; and

- iii. Potential mitigation measures including avoidance.

All environmental documents shall be transmitted directly to the Tribe by Certified U.S. mail. The City shall not rely upon the California State Clearinghouse to provide distribution, but shall provide the information directly to the Tribe in compliance with the statutory review period.

10. Projects that may be considered to have potential impact to archaeological sites and resources related to the Tribe include the following:

- i. Construction or ground disturbing activities in areas where ground disturbance has the potential to adversely affect cultural resources sites related to the Tribe that are eligible for listing in the National Register of Historic Places (NRIIP).
- ii. Construction or ground disturbing activities determined by a qualified professional archaeologist to potentially disturb cultural resources related to the Tribe.
- iii. Construction or ground disturbing activities in areas where Tribal villages, gravesites or activity sites are documented and known to have existed or occurred, or where the Tribe can reasonably demonstrate that villages, gravesites or activity sites are likely to occur.

11. **Mitigation.** The Parties agree to consult with one another to identify feasible and appropriate mitigation measures for impacts to cultural resources. For the Tribe avoidance is the preferred mitigation measure to potential impacts to cultural resources. The Parties acknowledge that there are several ways in which impacts to cultural resources can be mitigated and data recovery is but one mitigation measure that may be used. If data recovery is the only prudent and feasible mitigation measure, the City in consultation with the Tribe shall develop and implement a Data Recovery Plan prior to the commencement of ground disturbing activities in areas with cultural resources.

12. **Monitoring.** In the event that monitoring is required, as a mitigation measure, through a CEQA document the following applies to the monitoring requirement:

- i. The Project Contractor shall provide notification of the date/time and location of intended construction activities to the Tribal Historic Preservation Officer (THPO) and Tribal Chairman 14 days (or a shorter period as agreed to by both parties) prior to the start of any construction activities in areas that may impact archaeological sites/resources through disturbance of native soils in known or suspected archaeological areas.
- ii. In the event that the Tribe cannot supply an adequate number of tribal monitors in a timely manner for the project, the Project Contractor may hire other qualified Native American tribal monitors from other Mendocino, Lake or Sonoma County tribes to undertake monitoring activities for the project until such time as the Tribe provides its preferred tribal monitor.
- iii. If a scheduled tribal monitor is not on site when the work day starts, the Project Contractor will promptly contact the THPO and Tribal Chairman. The work shall then proceed without monitoring unless there is a Project Archaeologist present.
- iv. Where monitoring is required as a mitigation measure under CEQA, Native American monitoring shall be paid for by the property owner. When monitoring is requested by the



tribe, but it is not required as a mitigation measure in a CEQA document, the Tribe shall pay for the Native American monitoring.

- v. **Compensation.** The project applicant shall compensate the Sherwood Valley Band of Pomo Indians for tribal monitoring services provided by its tribal monitors. Invoices will be submitted by the Tribe on a bi-weekly basis and shall be paid to the Tribe within fourteen (14) days of submittal. Tribal Monitoring Services- \$ 50.00/hour (per monitor). Overtime (9 or more hours in a day excluding drive time to and from the site), Weekend, and Holiday - \$ 75.00/hour (per monitor). The Sherwood Valley Band of Pomo Indians shall be reimbursed for mileage costs of tribal monitors to and from the project site pursuant to the federal GSA rates. If the tribal monitor arrives after being notified there will be work, and if there is less than 3 hours of work the tribal monitor will receive 3 hours of pay, otherwise the tribal monitor will be paid for the actual number of hours worked. Tribal monitors will not be reimbursed for drive time to and from the site.

13. **Ethnographic Study.** Ethnographic studies may be warranted for some projects, as determined through the CEQA process. Where warranted as mitigation for project impacts to cultural resources, the study should at minimum:

- a. Be developed in consultation with the Tribe with regard to the study's scope of work and contractor selection;
- b. Determine if other cultural attributes associated with known sites, resources, or landscapes within the project area could contribute to the significance of previously identified cultural resources;
- c. Be viewed as complementing, rather than replacing, the larger Native American consultation effort for a project;
- d. Consist of ethnographic and historic research and interviews with Native American informants; and
- e. Be conducted concurrently with any archaeological investigations and integrated or attached to the body of any resulting reports, as they enhance understanding of the significance of the sites and the interpretation of the archaeological data.

14. **Discovery.** If cultural resources are encountered, ground disturbing activities shall cease immediately in the discovery location and a buffer zone of fifty (50) feet radius. If the find is known or suspected human remains and/or associated cultural resources, ground disturbing activities shall cease in the discovery location and a one hundred (100) feet radius buffer area. The size of the buffer may be adjusted once the project archaeologist, in consultation with the tribal monitor, has had the opportunity to examine the site. No construction activities will take place within the buffer until an archaeological investigation has been completed in accordance with the applicable provisions of this Agreement and any tribal monitor agreement agreed upon by the parties.

15. **Post-Review Inadvertent Discoveries.** Post-review discoveries most commonly occur when previously unidentified archaeological sites are uncovered during construction. However, other previously unknown cultural resources could also be discovered, or a project could be found to have unexpected effects on cultural resources.

- a. If during the identification phase, no significant resources are identified through an archaeological assessment, and the area has a moderate-to-high potential for previously unknown archaeological resources (as shown in Attachment I), the City will require a project-specific, Post Review Discovery Plan (PRDP) to efficiently and effectively address such potential discoveries. A PRDP template is provided in Addendum.
- b. If a PRDP is required on a project in which the Tribe has identified concerns, the draft PRDP shall be provided to the Tribe for comments and input prior to finalization.
- c. When there is no PRDP in place and a project affects a previously unidentified resource, the City shall notify the Tribe within forty-eight (48) hours of the discovery and consult with the Tribe in accordance with the provisions of 17.50.030E of the Land Use and Development Code.

**16. Treatment and Disposition of Native American Human Remains and Associated Cultural Resources.** Whenever Native American human remains and associated cultural resources are discovered during implementation of a project and the Tribe has been designated the MLD, the following provisions shall be implemented:

- a. The City will comply with 17.050.030E of the Fort Bragg Municipal Code if human remains are discovered. In addition to immediately stopping work on the project and notifying an archaeologist and the County coroner (as required by 17.050.030E) the City shall also immediately notify NAHC and SVBP.
- b. The Tribe shall be allowed, under California Public Resources Code sections 5097.98 (a) and 21083.2 and CEQA Guidelines section 15064.5 (e), to: (1) inspect the site of the discovery; and (2) make recommendations as to how the human remains and associated cultural resources shall be treated and disposed of with appropriate dignity. The City will ensure that the recommendations are followed, unless otherwise required by law.
- c. The Tribe shall complete its inspection within forty-eight (48) hours of receiving notification from either the City or the NAHC, as required by California Public Resources Code section 5097.98 (a). The Parties agree to discuss, in good faith, what constitutes "appropriate dignity" as that term is used in the applicable statutes.
- d. Reburial of human remains and associated cultural resources shall be accomplished in compliance with the California Public Resources Code sections 5097.98 (a) and (b) and 21083.2 and CEQA Guidelines section 15064.5 (e).
- e. For projects that occur on City owned land, the City will make good faith efforts to accommodate the Tribe's wish to rebury human remains and associated cultural resources on or near the site of their discovery, in an area that shall not be subject to future subsurface disturbances.
- f. It is understood by the Parties that, unless otherwise required by law, the site of any location of or reburial of Native American human remains or other cultural resources, on City property, shall remain confidential and shall not be disclosed and shall not be governed by public disclosure requirements of the California Public Records Act. Upon discovery of such remains or artifacts, the City shall withhold public disclosure information related to such reburial, pursuant to the specific exemption set forth in California Government Code section 6254 (r).

- g. The term "human remains" encompasses more than human bones because the Tribe's traditions periodically necessitated the ceremonial burning of human remains, tribal monitors shall make recommendations for removal of cremations, if such removal is necessary. Associated cultural resources include those artifacts associated with any human remains. These resources and the soil, in an area encompassing up to two (2) feet in diameter around the burial, and other funerary remnants and their ashes, are to be treated in the same manner as human bone fragments or bones that remain intact.
- h. Any human remains and associated cultural resources found during a project and not reburied shall be returned to the Tribe and not curated in any facility without prior written consent of the Tribe. This treatment shall also be extended to any cultural resources identified by the Tribe as sacred objects, unassociated funerary objects, and objects of cultural patrimony.
- i. After the recommendations are followed, the City may allow the project work to resume.
- j. The City shall record all burials, reburials, and sacred, religious, or ceremonial sites on the Sacred Lands Inventory Form, which shall be submitted to the NAHC.
- k. The City shall not display Native American skeletal remains and associated cultural resources that the Tribe regards as traditionally sacred that have been disinterred from within City boundaries without the prior written consent of the Tribe. This treatment shall also be extended to any cultural resources identified by the Tribe as sacred objects, unassociated funerary objects, and objects of cultural patrimony.
- l. The City shall receive prior written consent of the Tribe before permitting any photography or drawings of human remains and associated objects of cultural resources that are disinterred from City property.

17. **Treatment of Traditional Cultural Properties on City Land.** Where feasible, City projects should avoid impacts to burial areas, and other sacred, religious or ceremonial sites, including traditional cultural properties known or identified by the Tribe. Where avoidance of impacts due to development of City projects is infeasible, as determined by the City, the City shall consult with the Tribe to minimize and mitigate impacts and seek agreement on the appropriate treatment.

18. **Access to Sacred Sites.** Pursuant to California Public Resources Code sections 5097.9, where feasible and appropriate, the City shall consult with the Tribe to include mitigation measures that provide for Tribal access to places of traditional, spiritual or social importance (such as prayer sites, ceremonial sites and shrines), areas important in folklore and legend, and areas attributed with special or unique powers of sacredness identified and located on City-owned lands.

19. **Access to Biological Collecting Sites.** Within one (1) year of the execution of this Agreement, the City shall establish a program, in consultation with the Tribe, to:

- a. Identify locations within City-owned lands, that are currently utilized by the tribe to gather or collect botanical or other natural cultural resources and develop and implement a policy to manage herbicide use in these areas; and
- b. Allow for the gathering of biological resources for cultural purposes including but not limited to religious or ceremonial practice, traditional arts and crafts, and/or the preservation and maintenance of traditional life and food ways on City-owned or City-maintained lands, as permitted by local, State and Federal law, including City rights-of-way.



20. **Confidentiality.** The City recognizes and agrees to accommodate the Tribe's need to maintain confidentiality to protect archaeological sites, traditional cultural properties, and cultural resources, to the extent allowed for by law, including, but not limited to, exemption from public disclosure as set forth California Government Code section 6254(r). The Non-Disclosure and Confidentiality Agreement is incorporated herein by reference in Addendum 2 to this Agreement.

21. **Compliance.** Each Party to this Agreement shall comply with any and all tribal, federal, state and local laws. Nothing in this Agreement shall excuse the Parties from its obligation under any applicable state or federal environmental statute, including, but not limited to: CEQA and applicable regulations of the CEQA Guidelines; California Public Resources Code, sections 5097.98, 5097.99, and 5097.991; California Health and Safety Code, section 7050.5 (c); California Government Code, section 6254; and the First Amendment to the United States Constitution. Nothing in this Agreement is intended to make any of the above-referenced laws applicable where such laws would otherwise be inapplicable. Nothing in this MOU can alter the Parties' independent governing or regulatory obligations.

22. **Counterparts.** This Agreement may be signed in two or more counterparts and shall be effective when all the Parties and signatories have affixed their signatures to two or more of the counterparts and the counterparts have been delivered to the Parties, at which time the counterparts together will be deemed one original document.

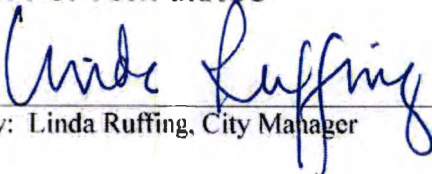
23. **Dispute Resolution.** If either party determines that a section or clause of this MOU is no longer suitable for its operations, then the party can request a 90-day consultation period to discuss and identify an alternative approach to the section or clause. If an alternative approach is agreed to by both parties the MOU may be amended as described below. If the parties cannot come to agreed upon alternative language to the section or clause, that is under dispute, that section or clause shall be struck from the MOU.

24. **Amendments.** This Agreement may be amended if both Parties agree to the amendment in writing.

23. **Term.** The duration of this Agreement is three (3) years from the date of last signature below. This Agreement may be renewed at the discretion of each party by the adoption of a resolution by City Council and the Tribal Council at the conclusion of the three (3) year term..


THEREFORE BE IT RESOLVED, by the signatures of the representatives on the date indicated below that the City and the Tribe formally endorses and accepts this Memorandum of Understanding.

CITY OF FORT BRAGG

  
By: Linda Ruffing, City Manager

5.28.2014  
Date

SHERWOOD VALLEY BAND OF POMO  
INDIANS

  
By: Michael Fitzgerrall, Tribal Chairman

6-2-14  
Date

APPROVED AS TO FORM:

CITY OF FORT BRAGG

See attached

David Warner, City Attorney

✓  
Date

SHERWOOD VALLEY BAND OF POMO INDIANS

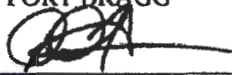
Kazhe Law Group PC

By: Christina V. Kazhe

\_\_\_\_\_  
Date

APPROVED AS TO FORM:

CITY OF FORT BRAGG



David Warner, City Attorney

May 30, 2014

Date

SHERWOOD VALLEY BAND OF POMO INDIANS

Kazhe Law Group PC

By: Christina V. Kazhe

Date



## CALIFORNIA ENVIRONMENTAL QUALITY ACT NEGATIVE DECLARATION

Department of Toxic Substances Control  
Brownfield and Environmental Restoration  
Program, Berkeley  
700 Heinz Ave, Suite 200  
Berkeley, CA 94710

Subject: ☒ DRAFT ☐ FINAL ☒ MITIGATED

Project Title: Remedial Action Plan, Operable Units C and D, Former Georgia-Pacific Mill Site

State Clearinghouse No.:

Project Location: Fort Bragg

County: Mendocino

Project Description: The California Department of Toxic Substances Control (DTSC) pursuant to regulatory authority granted under Chapter 6.8, Division 20 of the Health and Safety Code (H&SC) is considering approval of a Remedial Action Plan (RAP) to address soil and groundwater contamination existing at the Operable Unit (OU) C and OU-D sites located at the former Georgia-Pacific Corporation, Inc. Mill Site. The remedial activities will involve excavation of approximately 1,108 to 1,858 cubic yards (yds<sup>3</sup>) or approximately 60 - 90 truckloads (approximately 120 – 180 round trips) of contaminated soils from 5 excavation sites. Excavated soil will be transported off-site and taken to an authorized hazardous waste disposal facility. In addition, approximately 1,108 to 1,858 yds<sup>3</sup> of clean backfill materials will be imported from a nearby off-site location.

Remedial action will also include installation of soil covers, implementation of natural attenuation and monitoring to address contaminants present in groundwater beneath the site, site restoration activities, imposition of Land Use Covenants (LUCs), and approval of an Operations and Maintenance Plan.

Operable Unit C and Operable Unit D are within the following Assessor's Parcel Numbers (APN): 008-020-13, 008-053-34, 008-151-22, 008-161-08, 018-010-67, 018-020-01, 018-030-42, 018-040-52, 018-120-43, 018-430-13, 018-430-15, and 018-430-16.

Finding Of Significant Effect On Environment: *(An Initial Study supporting this finding is attached.)*

Mitigation Measures:

MM1: Excavation activities will be suspended if winds exceed 15 miles per hour (mph) sustained (for 15 minutes) or 25 mph (instantaneous gusts).

MM2: Vehicles entering or exiting construction areas will travel at a speed that minimizes dust, but not to exceed 15 mph. Construction workers will park in designated parking area(s) to reduce dust. All unpaved areas shall have a posted speed limit of 10 mph.

MM3: Water will be applied by means of trucks, hoses, and/or sprinklers prior to removal and excavation activities to minimize dust.

MM4: Water will be applied to disturbed areas as needed to keep working surfaces moist enough to minimize dust.

MM5: The disturbed work area will be sprayed with water at the end of the work shift to form a thin crust.

MM6: Earth or other material tracked onto neighboring (onsite or offsite) paved roads shall be removed promptly. Onsite paved roads will be washed down as needed. Parking areas, staging areas, and traffic pathways on the site shall be cleaned, as necessary, to control dust. Adjacent public streets shall also be cleaned, promptly, if soil materials from the site are visible.

MM7: Water will be applied to visibly dry unpaved roads to keep road surfaces moist enough to minimize dust emissions.

MM8: Soil stockpiles will be placed atop and covered with heavy-duty plastic sheeting when they are not actively being managed. Stockpile covering will be in good condition, joined at the seams, and securely anchored to minimize headspace where vapors may accumulate.

MM9: When not covered, soil stockpile surfaces will be kept visibly moist by water spray.

MM10: Open bodied trucks shall be covered when used to transport materials with the potential for airborne dust; and

MM11: Trucks and tires will be washed off before leaving the Mill Site to minimize tracking of dioxin/furans-affected dirt onto Cypress Street and/or SR 1. The waste water shall be collected with catch basin(s), managed on-site, and transported off-site for disposal,

MM12: A professional archaeologist and/or architectural historian will review previous archaeological reports prior to ground disturbing activities to identify the location and perimeter of historical resources within the Area of Potential Effect (APE); OU-C, and OU-D. These sensitive areas will be protected by appropriate fencing.

MM13: The professional archaeologist and a Native American Monitor will be on site during all ground disturbing activities.

MM14: Upon discovery of historical resources during construction activities, the professional archaeologist will halt all work within 50 ft. radius of the find until an assessment has been completed, and simultaneously report findings to the DTSC and City.

MM15: The professional archaeologist will submit a draft and final Phase II Investigation Report to the DTSC and City for review and approval.

MM16: The professional archaeologist must record and submit all necessary DPR 523 Forms to the California State Parks, Office of Historic Preservation upon completion of the Phase II Investigation Report.

MM17: Native American or Tribal Monitor(s) will be Hazardous Waste Operations and Emergency Response (HazWOPER) trained and certified. Copies of current HazWOPER certification will be provided to DTSC and the City prior to implementation of construction activities.

MM18: Tribal monitoring services will be required whenever construction activities include ground disturbance of native soils in, or adjacent to, known and suspected archaeological sites. If during construction activities any archaeological artifacts or features are encountered, both the Project Archaeologist and the Tribal Monitor(s) are empowered to stop construction activities within a 50 foot radius of the find. Work within this buffer shall temporarily cease until the Project Archaeologist, in consultation with the Tribal Monitor, make a determination on (1) whether the find is an archaeological artifact; (2) whether the find is located within an intact context (i.e. not within disturbed fill soils), (3) whether the find is part of a site area that has been mitigated through data recovery, (4) whether the find is an isolated item, (5) whether the find is part of a larger previously unknown archaeological site. and (6) the best course of action to avoid or minimize impacts to the resources as applicable.

MM19: If the find is determined to be both in an intact context, and meets the standard for designation as an archaeological site or is a portion of a known archaeological site, then the provisions of the Coastal Land Use and Development Code (CLUDC 17.50.030E), and the Memorandum of Understanding (MOU) and attachments between the City of Fort Bragg and Sherwood Valley Band of Pomo Indians shall be followed.

MM20: If the find is determined to be within an area mitigated through data recovery, it shall be expeditiously documented pursuant to the terms of the Data Collection Plan (DCP) and the ESA Monitoring Plan. Materials that are not collected by the archaeologist will be reburied onsite in the designated cultural resource reburial area or other area as agreed upon in writing by the parties.

MM21: If the find is determined to be either from a clearly disturbed context (i.e. disturbed fill soils, back dirt piles) or the find is determined to be an isolated find that is clearly not associated with an archaeological site, the item shall be

recorded as such and then reburied onsite in the designated cultural resource reburial area or other area as agreed upon in writing by the parties.

MM22: Human remains will not be disturbed or removed from their original resting place unless removal is unavoidable and necessary.

MM23: Procedures for the discovery of human remains and associated items are as follows.

- a. Georgia-Pacific or designee shall first contact the appropriate law enforcement agency (County Coroner) and immediately notify the Tribal Chairman and Tribal Historic Preservation Officer (THPO) or assigned designee. If the remains constitute a crime scene, all applicable laws and procedures apply.
- b. If the discovery is not a crime scene, all ground disturbing activities shall cease at the discovery location including a buffer as determined by the Project Archaeologist, in consultation with the Tribal monitor and the THPO, but not less than 50 feet. No construction activities will take place within the buffer until an archaeological investigation has been completed.
- c. Out of respect for the remains, all work related to the remains shall be conducted out of the public eye, unless otherwise required by law.
- d. If the Coroner determines that the remains are of, or thought to be of Native American origin, they are required to contact the Native American Heritage Commission pursuant to PRC 5097.98.
- e. The Native American Heritage Commission (NAHC) will then immediately designate a person or persons it believes is the Most Likely Descendent (MLD). The MLD shall within 48 hours of being notified recommend means for treating and disposing with appropriate dignity, the human remains and associated items.
- f. The preferred protocol upon the discovery of Native American human remains is to secure the area, cover any exposed human remains or other cultural items, and to avoid further disturbance. No laboratory studies are permitted. The preferred treatment for exhumed Native American human remains is reburial in an area not subject to further disturbance. Should reburial of the human remains be required, Georgia-Pacific shall rebury them in the designated reburial area on site.

MM24: All stockpiles of excavated soils will be within fenced areas and covered with heavy duty polyethylene liners to prevent migration of contaminants, shield the material from elements, and mitigate fugitive dust and storm water run-on and runoff.

MM25: Temporary staging areas will be set up adjacent to excavations for soil stockpiling. Excavated material will be placed on plastic sheeting and covered by plastic sheeting to mitigate migration of affected soil, shield the material from elements, and mitigate fugitive dust and stormwater run-on and runoff.

MM26: Open bodied trucks shall be covered when used to transport soil. Trucks shall be brushed or washed down with water to removed soil on the truck and tires, after loading and prior to leaving the Site.


MM27: Visible soils carried onto Cypress Street and/or SR 1 via trucks, earth moving equipment, water, or other means shall be promptly removed.

MM28: Temporary staging areas will be set up adjacent to excavation areas for soil stockpiling. Excavated material be placed on plastic sheeting to stop migration of soil, shield the soil from the elements, and eliminate fugitive dust and storm water run-on and runoff.

MM29: Truck routes will be established in the Transportation plan to be submitted and approved by DTSC. Trucks will enter and exit the site at the Cypress Gate, travel on SR1 to SR20, then travel on SR20 to US101. Trucks will then travel south on US1010 and then continue to the disposal facility.

MM30: Coordinate with the local and state enforcement agencies, first responders, and Caltrans if emergency response is needed.



 _____ Unit Chief Signature	<sup>2015</sup> <del>June 3, 2014</del> _____ Date	
Denise Tsuji _____ Unit Chief Name	Unit Chief _____ Title	510-540-3824 _____ Phone #



## **Appendix E**

Responses Summary

## **Appendix F**

Statement of Reasons and  
Nonbinding Allocation of  
Responsibility



# **STATEMENT OF REASONS**

## **Former Georgia-Pacific Wood Product Facility**

## **Operable Units C and D Remedial Action Plan**

## **Fort Bragg, California**

Pursuant to California Health and Safety Code (HSC) Section 25356.1(d), the California Environmental Protection Agency (Cal/EPA), Department of Toxic Substances Control (DTSC) has prepared this Statement of Reasons and Nonbinding Preliminary Allocation of Responsibility as part of the Remedial Action Plan (RAP) for the Former Georgia-Pacific Wood Products Facility, Operable Unit (OU) C and OU-D, Fort Bragg, California (Site). OU-C and OU-D have been divided into 32 Areas of Interest (AOIs).

The RAP presents a summary of the Remedial Investigation (RI) and Feasibility Study (FS) that address the constituents of concern (COCs) identified at the Site. The primary COCs are lead, dioxin, Benzo(a)Pyrene (B(a)P), pentachlorophenol, and total petroleum hydrocarbon (TPH)-diesel in soil; volatile organic compounds (VOCs), like benzene and naphthalene in soil gas; and VOCs, pentachlorophenol, dioxin, arsenic, atrazine and TPH-diesel in groundwater.

The RAP summarizes the results of risk assessment performed to determine the potential risks to public health and the environment associated with the contaminants and provides an evaluation of remedial alternatives. The RAP recommends remedial alternatives that will meet the objectives of protecting public health and the environment. The RAP proposes remediation of soil by excavation and off-site disposal of soil at five AOIs. Remediation of soil and soil gas at three AOIs include restriction on use, through a Land Use Covenant (LUC), and long term protections through Operations and Maintenance. Contaminants in soil vapor at two AOIs are further addressed through Vapor Mitigation Systems. Groundwater is remediated through a combination of source removal, natural attenuation and Operation and Maintenance at three AOIs and natural attenuation and Operation and Maintenance at four AOIs. A Land Use Covenant will restrict the domestic use of groundwater and Operation and Maintenance will provide monitoring of groundwater at all six AOIs with groundwater remedies.

DTSC believes that the RAP complies with the law as specified in HSC Section 25356.1. Section 25356.1(e) requires that RAPs “shall include the basis for the remedial actions selected and an evaluation of each alternative considered and rejected.” The RAP “shall also include an evaluation of the consistency of the selected remedial actions with requirements of the Federal regulations and factors specified in subdivision (d)...” Subdivision (d) specifies six factors against which the remedial alternatives in the RAP must be evaluated. The proposed remedial action is consistent with the National Oil and Hazardous Substances Pollution Contingency Plan (the National Contingency Plan, “NCP”), the Federal Superfund regulations. The RAP for the Site has addressed these factors in detail. A brief summary of each factor follows. This Statement of Reasons also includes the preliminary Nonbinding Allocation of Responsibility (NBAR) as required by HSC Section 25356.1(e).

### **1. HEALTH AND SAFETY RISKS – SECTION 25356.1 (D) (1)**

A Human Health Risk Assessment (HHRA) is summarized in the RAP. The HHRA evaluated the potential human health risks associated with the presence of chemicals in soil, soil gas, and groundwater at the Site based on current and projected future site use. The HHRA findings are:

The key findings of the human health and ecological risk assessments are summarized below. The human health risks are associated with potential soil and soil vapor/indoor air exposures. Twenty-two Exposure Units (EUs) were evaluated in the risk assessment: fifteen in OU-C and seven in OU-D. The following bullets discuss the EUs identified in the health risk assessment as posing increased risks and/or hazards because of elevated concentrations of COPCs in soil and/or soil vapor. An Exposure Unit may contain one or more AOIs. Issues with respect to specific COPCs are also discussed.

## Human Health Risk Assessment

### **Soil**

- At Dry Sheds #4/#5 in OU-C, the risk from potential exposure to PAHs in soil is slightly elevated in a residential land use scenario.
- At the Exposure Unit identified as North of IRM in OU-C, the risk from potential exposure to dioxin TEQs in soil is slightly elevated in a residential land use scenario. However the maximum concentration of dioxin TEQs is 22 parts per trillion (ppt) and is below the unrestricted remedial goal of 50 ppt.
- At Former Parcel 3 MES/Pilot Study in OU-C, the presence of cobalt and arsenic pose a slight increase in the Hazard Index or cancer risk for the construction worker or utility/trench worker.
- At the Exposure Unit identified as OU-D South, dioxins pose slightly elevated risks to potential residents and commercial/industrial workers. However the Exposure Point Concentration (EPC) for dioxin TEQ is 34 ppt and is below the unrestricted remedial goal of 50 ppt.
- Arsenic. The majority of arsenic concentrations in soil detected in OU-C and OU-D soil were within the site-specific background concentration; therefore, the human health risk assessments do not include risk from exposure to arsenic in soil, with the exception of arsenic at the Former MES/Pilot Study and Former Dip Tank. The human health risk evaluation for the Former MES/Pilot Study and Former Dip Tank Exposure Units includes arsenic in the shallow depth interval, and the arsenic EPC was adjusted to exclude the background concentration (10 mg/kg).
- Lead. Using the upper confidence limit (UCL) on the mean the soil lead EPC at the former AST EU exceeded Site Screening Levels (SSLs) for the residential child, the construction worker, and the utility worker receptors.
- Total Petroleum Hydrocarbon diesel (TPH-diesel). TPHs were not identified as contaminants contributing to human health risks or hazards at any EU. Therefore, soil TPH concentrations were evaluated elsewhere based on the protection of groundwater from leaching of TPHs from soil to groundwater.

### **Soil Vapor**

- At Former AST in OU-C, the risks and hazards from potential exposure to VOCs (benzene, ethyl benzene, 1,2,4-trimethylbenzene (TMB), and naphthalene) intruding indoors from subsurface soil are significantly elevated for both the residential and commercial land use scenarios.
- At Former Parcel 3 MES/Pilot Study in OU-C, the risks and hazards from potential exposure to VOCs (benzene, ethylbenzene, 1,2,4-TMB, and naphthalene) intruding indoors from subsurface soil are significantly elevated for the residential and commercial land use scenarios.
- At Planer #2 in OU-D, the risks and hazards from potential exposure to VOCs (vinyl chloride, tetrachloroethylene (PCE), 1,2,4-TMB, and 1,1-dichloroethylene (DCE))

intruding indoors from subsurface soil are significantly elevated for the residential and commercial land use scenarios.

#### **Groundwater**

- Because the groundwater is not used at the former mill site, groundwater was not included in the risk assessment. COCs in groundwater were compared to the North Coast Water Quality Objectives to determine if a remedial action was necessary.

#### **Ecological Health Risk Assessment**

An ecological health risk assessment was carried out for all AOIs or EUs. The only AOI showing an unacceptable ecological risk is the Riparian AOI sediments within the drainage because of potential exposure by ecological receptors to metals, PAHs and dioxins/furans. This AOI was moved to OU-E for further evaluation, since it is related to the predominant features of OU-E, including the man-made ponds, and will likely be designated as open space.

#### **2. BENEFICIAL USES OF THE SITE RESOURCES – SECTION 25356.1 (D) (2)**

The Site is a former lumber mill and is not in use, with the exception of some remaining buildings being used as storage. The closed mill provide open space for wildlife, including coyote, deer, rabbits, and geese. There is no approved plan for redevelopment of the mill site; however, a draft site specific plan envisioned residential, commercial, industrial and recreational uses of the former mill site.

#### **3. EFFECT OF REMEDIAL ACTIONS ON GROUNDWATER RESOURCES – SECTION 25356.1(D) (3)**

Although the Regional Water Quality Control Board (RWQCB) has designated groundwater in the area as having beneficial use for domestic and municipal supply, agricultural supply, and industrial supply, groundwater beneath the Site is not a drinking water source. The proposed groundwater remedial actions at seven sites include natural attenuation and restrictions on the domestic use of groundwater. The area affected by the groundwater use restriction is less than five percent of OU-C and OU-D. The restriction on groundwater use would not significantly limit the possibility future use of groundwater resources at the Site.

#### **4. SITE-SPECIFIC CHARACTERISTICS – SECTION 25356.1 (D) (4)**

The approximately 415-acre site is located west of Highway 1 along the Pacific Ocean coastline and is bounded by open coastline to the north, the City of Fort Bragg (City) to the east, Noyo Bay to the south, and the Pacific Ocean to the west. According to historical records, Union Lumber Company (ULC) began sawmill operations at the site in 1885. Georgia-Pacific acquired the site in 1973 and ceased lumber operations on August 8, 2002. Much of the equipment and structures associated with the lumber production have since been removed.

The northern area of the site is defined as Operable Unit C (OU-C) and is approximately 114 acres. OU-D is located in the southern part of the site and includes approximately 110 acres. OU-C and OU-D were subdivided into 32 Areas of Interests (AOIs) based on formal use. The OU-C and OU-D Remedial Action Plan (RAP) considered remedial alternatives for eleven AOIs. The Remedial Investigation for OU-C and OU-D was approved by DTSC on April 12, 2011. DTSC approved the Feasibility Study for these OUs on February 17, 2012. The RAP considered Remedial Action for the following AOIs:

1. Parcel 2 AOI:
  - Groundwater: dioxin/furans and pentachlorophenol (PCP)
2. Former Aboveground Storage Tank (AST) AOI:
  - Soil: lead, total petroleum hydrocarbons (TPH)



- Soil vapor: benzene, ethylbenzene, 1,2,4-trimethylbenzene, and naphthalene
  - Groundwater: benzene, naphthalene, total petroleum hydrocarbons in the gasoline range (TPHg), total petroleum hydrocarbons in the diesel range (TPHd), tetrachloroethene (PCE), and cis-1,2-dichloroethene (cis-1,2-DCE)
3. Former Mobile Equipment Shop (MES)/Pilot Study AOI:
    - Soil vapor: benzene, ethylbenzene, 1,2,4-trimethylbenzene, and naphthalene
    - Groundwater: benzene, naphthalene, TPHg, TPHd, PCE, and cis-1,2-DCE
  4. Former Dip Tank AOI:
    - Soil: dioxins/furans and pentachlorophenol (PCP)
    - Groundwater: dioxins/furans and PCP
  5. Rail Lines East AOI:
    - Soil: lead and Benzo(a)Pyrene [B(a)P]
  6. Kilns AOI:
    - Soil: TPHd and B(a)P
  7. Former Machine Shop (MS)/IRM AOI:
    - Soil: TPHd and lead
    - Groundwater: TPHd, benzene, and vinyl chloride
  8. Former Planer #2 AOI:
    - Soil: TPHd and B(a)P
    - Soil Vapor: 1,1-dichloroethene, 1,2,4-trimethylbenzene, PCE, vinyl chloride
    - Groundwater: 1,1-dichloroethane (1,1-DCA), 1,1-dichloroethene (1,1-DCE), and naphthalene
  9. Former Shipping Office and Truck Shop AOI:
    - Soil: TPHd
  10. Sawmill/Sorter AOI:
    - Groundwater: arsenic
  11. Greenhouse AOI:
    - Groundwater: atrazine

## **5. COST-EFFECTIVENESS OF ALTERNATIVE REMEDIAL ACTION MEASURES – SECTION 25356.1(D) (5)**

The RAP evaluated remedial alternatives to protect human health and groundwater resources. Focused excavation and removal of residual impacted soil at five AOIs is expected to allow for unrestricted use of the property. Groundwater remediation involves source removal, limited in-situ treatment and natural attenuation. The Feasibility Study included an evaluation of the costs of each remedial alternative. The proposed remedial actions are cost-effective while meeting remedial action objectives.

#### **6. POTENTIAL ENVIRONMENTAL IMPACTS OF REMEDIAL ACTIONS – SECTION 25356.1 (D) (6)**

Potential environmental impacts during the remedial action will be controlled by implementation of an Air Emissions Monitoring and Control Plan to address air quality monitoring and dust and odor control, a Storm Water Pollution Prevention Plan to provide monitoring procedures and best management practices for storm water management, a Transportation Plan to describe waste handling and off-site transport procedures, and a Health and Safety Plan that would specify engineering and administrative controls. Cultural Resources shall be protected at excavation sites through implementation of a monitoring program. Based on an evaluation of potential impacts in an Initial Study, DTSC has determined the project might have a significant effect on the environment and a proposed Mitigated Negative Declaration has been prepared pursuant to the California Environmental Quality Act (CEQA) for the recommended remedial alternative. The CEQA Negative Declaration will undergo a 45-day public comment period, concurrent with the Draft RAP. The proposed Mitigated Negative Declaration and the Final Initial Study are presented in Appendix E of the RAP.

#### **7. NONBINDING PRELIMINARY ALLOCATION OF FINANCIAL RESPONSIBILITY – SECTION 25356.1 (E)**

Consistent with the purpose of the NBAR, as described above, DTSC sets forth the following preliminary Nonbinding Allocation of Responsibility: Georgia-Pacific Corporation, for purposes of complying with its obligations under the Site Investigation and Remediation Order, Docket No. HAS\_RAO 06-07-150, has agreed to be responsible for 100% of the remediation costs for Operable Units C and D of the Site. DTSC understands that this is a nonbinding undivided 100% share of responsibility, subject to the identification of other PRPs at a later date.



## Department of Toxic Substances Control



**Matthew Rodriguez**  
Secretary for  
Environmental Protection

Deborah O. Raphael, Director  
700 Heinz Avenue  
Berkeley, California 94710-2721

**Edmund G. Brown Jr.**  
Governor

December 17, 2015

Mr. David G. Massengill  
Senior Director  
Georgia-Pacific LLC  
133 Peachtree Street NE  
Atlanta, Georgia 30303  
[DGMassen@gapac.com](mailto:DGMassen@gapac.com)

REMEDIAL ACTION PLAN, OPERABLE UNIT C AND OPERABLE UNIT D, DATED  
DECEMBER 2015, FORMER GEORGIA-PACIFIC WOOD PRODUCTS FACILITY,  
FORT BRAGG, CALIFORNIA

Dear Mr. Massengill:

The Department of Toxic Substances Control (DTSC) has received and reviewed the *Remedial Action Plan Operable Unit C and Operable Unit D* dated December 2015. Georgia-Pacific LLC, submitted the OU-C and OU-D RAP pursuant to Section 5.11 of the Site Investigation and Remediation Order (Order) (Docket No. HSA-RAO 0607- 150) for the former Georgia-Pacific Wood Products Facility located at 90 West Redwood Avenue, Fort Bragg, Mendocino County, California (Site).

In accordance with Chapter 6.8 of the California Health and Safety Code (H&SC), the DTSC approves the OU-C and OU-D RAP. DTSC released the OU-C and OU-D RAP for a 45-day public comment period from June 11, 2015 to July 27, 2015. On July 9, 2015, DTSC held a Public Meeting on the OU-C and OU-D RAP. The comments received are addressed in the Responsiveness Summary, which is included in Appendix E of the Final OU-C and OU-D RAP. DTSC approved the Final Mitigated Negative Declaration for the OU-C and OU-D RAP on December 16, 2015.

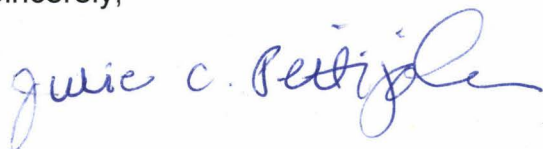
Pursuant to Health and Safety Code (HSC) Section 33459.3 (b), DTSC acknowledges that upon proper completion of the work defined within the approved OU-C and OU-D RAP, the immunity provided by HSC section 33459.3 shall apply to the City of Fort Bragg, and any other entities as specified and limited in that section. However, in the event of the failure of the courts to uphold this determination, this determination shall not create any additional rights against DTSC by the City of Fort Bragg or by any third party.



Mr. David G. Massengill  
December 17, 2015  
Page 2

We look forward to the implementation of the OU-C and OU-D RAP and appreciate your cooperation in achieving our mutual cleanup objectives. If you have any questions, you may contact Mr. Thomas Lanphar of my staff at (510) 540-3776 or via e-mail at [Tom.Lanphar@dtsc.ca.gov](mailto:Tom.Lanphar@dtsc.ca.gov).

Sincerely,

A handwritten signature in blue ink, reading "Julie C. Pettijohn".

Julie C. Pettijohn, MPH, CIH  
Senior Environmental Scientist Supervisor  
Brownfields & Environmental Restoration Program  
Department of Toxic Substances Control

cc (via email):

Ms. Linda Ruffing, City Manager  
Fort Bragg Community Redevelopment Department  
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Mr. David G. Massengill  
December 17, 2015  
Page 3

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