

**ADDENDUM TO THE FINAL SUBSEQUENT ENVIRONMENTAL IMPACT REPORT FOR THE FORT BRAGG  
COASTAL RESTORATION AND TRAIL PROJECT PHASE II PROJECT  
JULY 20 2016**

**I. INTRODUCTION**

Pursuant to the provisions of the California Environmental Quality Act (CEQA), the City of Fort Bragg, (City), acting in the capacity of Lead Agency, distributed a Draft Subsequent Environmental Impact Report (State Clearinghouse No.: 2014102014) for the Fort Bragg Coastal Restoration and Trail Project Phase II (Coastal Trail) for public review and comment from November 25, 2014 to January 8, 2015. The Final Subsequent Environmental Impact Report (SEIR) was certified by the City on January 12, 2015.

As a Responsible Agency, the Department of Toxic Substances Control (DTSC) have amended the Final SEIR to incorporate activities anticipated as a result of implementation of a draft Interim Removal Action Workplan (RAW) and related activities, for Operating Unit (OU-E) (approximately 12 acres) which was completed after adoption of the Final SEIR. This Addendum has been prepared to supplement the project description and the analysis in the SEIR.

DTSC and the City have determined that an Addendum is the appropriate subsequent CEQA document for the RAW activities pursuant to the CEQA Guidelines [Cal. Code Regs., tit. 14, § 15164(b)] because none of the conditions described in Section 15162 of the CEQA guidelines apply. Pursuant to Section 15164(c) of the CEQA Guidelines, this Addendum is not being circulated for public review and comment, but will be attached to the Final SEIR. A Notice of Determination will be filed with the State of California Office of Planning and Research, State Clearinghouse following approval of the RAW.

**II. BACKGROUND**

The SEIR for the Coastal Trail Project evaluated impacts resulting from restoration, construction of a multi-use trail, installation of pedestrian-only side trails, and installation of related improvements. The restoration would encompass approximately five acres between the bluff edge and the City's property line on the north side of the Waste Water Treatment Plant. Restoration would involve creating locally appropriate native habitats and include the importation of approximately 5,000 cubic yards of a mix of sand, soil and composted grain/woodchips for restoration purposes. The multi-use trail would be approximately 0.8 miles in length and would be 8 feet wide, constructed on top of existing developed areas throughout the length of the project site. The pedestrian-only side trails will be installed in the area known as Johnson point.

While the SEIR provided information regarding the contamination at the former Georgia-Pacific Lumber Mill Site (Mill Site) and the need for remediation to occur in the OU-E area, the document failed to identify DTSC as a CEQA Responsible Agency or provide information regarding the possible impacts that would occur from the remedial activities needed at OU-E. DTSC has determined that project elements have changed: detailed remedial activities described in the Draft Removal Action Work Plan - Operable Unit E (Arcadis, May 2016) must be incorporated as part of the Coastal Trail Project to ensure adequate environmental impact review for all components of the Coastal Trail Project.

### III. PURPOSE OF ADDENDUM AND CEQA REQUIREMENTS

The purpose of this Addendum is to address the environmental effects of the DTSC's RAW for OU-E, as set forth in the Explanation of Significant Differences, in order to determine whether any significant environmental impacts which were not identified in the SEIR would result, or, whether previously identified significant impacts would be substantially more severe. This document has been prepared in accordance with the CEQA Guidelines, [Cal. Code Regs., tit. 14, §15164 and §15162].

The CEQA Guidelines[Cal. Code Regs., tit. 14, §15162(a)] provides that, for a project covered by a certified Environmental Impact Report (EIR) or adopted negative declaration, preparation of a subsequent EIR or negative declaration rather than an Addendum is required only if one or more of the following conditions occur:

1. *Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;*
2. *Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of the previously identified significant effects; or*
3. *New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time of the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:*
  - a) *The project will have one or more significant effects not discussed in the previous EIR or negative declaration;*
  - b) *Significant effects previously examined will be substantially more severe than shown in the previous EIR or negative declaration;*
  - c) *Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or*
  - d) *Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR or negative declaration would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measures or alternative.*

Cal. Code Regs., tit., § 15164(a) and (b) of the CEQA Guidelines state:

- (a) *The lead agency or a responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.*
- (b) *An addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in*

*Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred." (underline added)*

Based on the analysis presented herein, it has been determined that an Addendum to the SEIR is the appropriate CEQA document to address the RAW activities given that none of the conditions described in the CEQA Guidelines [ Cal. Code Regs., tit. 14, § 15162] calling for the preparation of a subsequent EIR or negative declaration have occurred, but that there are changes and additions necessary to attach to the certified SEIR. The environmental analysis relies on the analyses completed in the SEIR and directly references the SEIR where appropriate.

#### **IV. APPLICATION OF PREVIOUSLY CERTIFIED ENVIRONMENTAL DOCUMENTATION TO OU-E RAW**

##### **Description of OU-E RAW within SEIR**

The Project Description in the SEIR for the Coastal Trail project indicated that the project site included an approximately 12 acre area (OU-E), formerly occupied by the Georgia-Pacific Lumber Mill Site. The project's purpose includes 1) restoring native habitats throughout the proposed parkland and 2) establishing public access to the site. The existing conditions at the Coastal Trail project site that require remediation are described, utilizing information from the Final Remedial Investigation Report Operable Unit E (Arcadis, 2013). The Areas of Concern (AOCs) with respective contaminants of concern (COCs) are also described and include metals, PAHs, dioxins/furans, TPH, PCB, and VOCs.

The City reviewed technical reports that had been prepared in support of remediation activities, and specified that Georgia-Pacific would be submitting a Remedial Action Plan (RAP) for addressing the types and areas of contamination. This RAP will provide the final remedial plan for the entire 415 acre site, including OU-E. The SEIR revealed that there would be a potentially significant impact for the Coastal Trail project to expose visitors to hazardous substances that pose a risk to human health if the areas within OU-E were not remediated. This impact was mitigated to a less-than-significant level by prohibiting Coastal Trail project activities within the Mill Complex Area (a portion of OU-E) until after implementation of the RAP for the entire site, including OU-E. Subsequent to the certification of the SEIR, DTSC determined that prior to proceeding with the RAP for the entire site, an interim RAW for OU-E would be required. This RAW would remediate the area that would be affected by the proposed Coastal Trail project and would provide the necessary protection for human health that the RAP, as noted in the Final SEIR, would have done. The implementation of the RAW will serve the same function in OU-E that the RAP would have done and will serve as the mitigation for the impact identified in the SEIR.

##### **Overview of OU-E RAW Activities**

The OU-E RAW is an interim action to address impacted soil, groundwater, and sediment within OU-E on an accelerated basis to support the construction and public use of the Coastal Trail project, which is anticipated to occur in 2017. Once the proposed RAW activities are complete, risks to public health and the environment will be mitigated and the areas identified in the RAW will be acceptable for the planned recreational use.

DTSC's removal and restoration activities primarily consist of excavation of soil or sediment to reduce overall potential risk to human health and ecological receptors, as well as restore areas with native species to improve aquatic ecosystems. In total, proposed OU-E excavation activities amount to

removing approximately 3,500 cubic yards (cy) at depths between 0.5 and 7.5 feet below ground surface (bgs) in an approximate 24,630 square foot (sf) footprint.

As a CEQA Responsible Agency, DTSC's remedial activities as outlined in the OU-E RAW must be included within the SEIR because implementation of the Coastal Trail project cannot occur without approval and completion of the RAW activities.

*\*\*Therefore, the following has been added to the Project Description of the SEIR as Section 2.4.5, beginning on page 2-9 to ensure the document includes all reasonably foreseeable related activities\*\*:*

The Removal Action Workplan calls for removing and transporting approximately 3,500 cubic yards (cy) of chemically-impacted soil to an appropriate, permitted off-Site landfill for disposal. The soil would be removed over an area of less than one acre, within a 12 acre OU-E site.

#### Lowland Terrestrial Soil

The *Baseline Human Health and Ecological Risk Assessment, Operable Unit E* (BHHERA; Arcadis U.S., Inc. 2015) identified 12 sample locations with elevated concentrations of either benzo(a)pyrene (B(a)P) toxic equivalent (TEQ), 2,3,7,8-TCDD (dioxin) TEQ, or lead, which were developed into eight areas for hot spot excavation. Adding one additional hot spot excavation area for total petroleum hydrocarbons as diesel (TPHd), there are nine areas for hot spot excavation located in the terrestrial lowland (Figures 4 through 7 of the OU-E RAW, respectively). The three excavations for B(a)P TEQ amount to approximately 607 cy with a maximum excavation depth of 4 feet below ground surface (bgs). The one excavation for dioxin TEQ amounts to approximately 43 cy with a depth of 3 feet bgs. The seven lead excavations amount to approximately 666 cy with a maximum excavation depth of 6 feet bgs. The TPHd hot Soil Contamination spot excavation area amounts to approximately 194 cy with an excavation depth of 6 feet bgs. Sidewall and bottom confirmation samples will be collected during the excavations. Soil will be excavated using conventional construction equipment and would be either temporarily stockpiled and managed to prevent dust and odors or directly loaded into truck beds.

Approximately 175 truckloads will be required to transport soil for disposal to a nonhazardous waste disposal facility. Clean on-site materials will be utilized for excavation backfill material. If on-site material is not available, additional truckloads will be required to transport clean imported soil for backfill, obtained from a local source and tested for quality control. Assuming a production of 200 cy per day, 1 day for mobilization/demobilization activities, and 0.5 day for delineation activities, excavation is expected to take 14 - 18 days.

#### Ponds 2 and 3 (Southern Ponds) Sediment

Sediment in Ponds 2 and 3 is proposed to be excavated due to elevated dioxin TEQ concentrations. Excavation in Pond 2 amounts to approximately 474 cy with excavation to a depth of 2 feet bgs, and hot spot excavation in Pond 3 amounts to approximately 222 cy with excavation to a depth of 1 foot bgs (Figure 8 of the OU-E RAW). Sidewall and bottom confirmation samples will be collected. Sediment will be excavated using conventional construction equipment and would be either temporarily stockpiled and managed to prevent dust and odors or directly loaded into truck beds. Assuming a load capacity of 20 cy per truck, approximately 35 truckloads will be required to transport sediment for disposal to a nonhazardous waste disposal facility. The pond extent will be reseeded with native plant species to restore ecological conditions. The pond depth may be allowed to increase depending on the resulting geometry and agency permit requirements. Assuming a production of 200 cy per day, 0.5 day for reseeded activities, and 1 day for

mobilization/demobilization activities, implementation is expected to take 5 days.

#### Pond 7 Sediment

Sediment in Pond 7 is proposed to be excavated due to elevated dioxin TEQ concentrations. Resulting excavation amounts to approximately 1,200 cy with excavation to a depth of 7.5 feet bgs (Figure 9 of the OU-E RAW). Sidewall and bottom confirmation samples will be collected. Sediment will be excavated using conventional construction equipment and would be either temporarily stockpiled and managed to prevent dust and odors or directly loaded into truck beds. Assuming a load capacity of 20 cy per truck, approximately 60 truckloads will be required to transport sediment for disposal to a nonhazardous waste disposal facility. The pond depth and size may be allowed to increase depending on the resulting geometry and agency permit requirements. Assuming a production of 200 cy per day and 1 day for mobilization/demobilization activities, implementation is expected to take 7 days.

#### Riparian Area

Sediment in the riparian area is proposed to be excavated due to elevated dioxin TEQ concentrations. Approximately 32 cy with excavation to a depth of 0.5 feet bgs will be excavated using conventional construction equipment and would be either temporarily stockpiled and managed to prevent dust and odors or directly loaded into truck beds. Sidewall and bottom confirmation samples will be collected during the excavations. Assuming a load capacity of 20 cy per truck, approximately 2 truckloads will be required to transport sediment for disposal to a nonhazardous waste disposal facility. The excavation extent will be reseeded with native plant species to restore ecological conditions. Implementation is expected to take 1-2 days.

#### **Wetland Creation**

RAW activities will impact approximately 0.064 acre of waters of the United States (0.055 acre of wetland habitat and 0.009 acre of stream habitat), and approximately 0.476 acre of waters of the State (which includes the 0.064 acre of impacts to waters of the United States), and approximately 0.020 acre of upland riparian habitat. The impacts will be temporary in nature, and restoration activities would occur immediately following completion of OU-E Removal and through a five year monitoring and adaptive management program.

The applicant proposes to create in-kind, in-place restoration of wetland, stream, and upland riparian habitats at a 1:1 ratio and establish 0.548 acre of new wetlands in the portion of OU-E immediately north of Pond 7 and to the east of Pond 6. The proposed restoration and wetland establishment activities will result in a mitigation ratio of approximately 16:1 for waters of the United States and 2.2:1 for waters of the State. The applicant also proposes to implement a wetland mitigation and adaptive management plan (Attachment 2) to ensure successful establishment of a native plant community within the impacted and established wetlands.

#### **Well Decommissioning**

Fifty-seven of the wells proposed for decommissioning are located in areas recommended for no further action (NFA) for groundwater, or are locations at which sampling has been discontinued per the approved CMP and associated updates. See Attachment 4 to view wells proposed for decommissioning. Thirty-one monitoring wells located in OU-B, OU-C, OU-D, and OU-E are proposed for decommissioning due to historical concentrations of COIs primarily below detection limits or below applicable screening levels. Six monitoring wells are proposed for decommissioning in OU-D and three monitoring wells are proposed for decommissioning in OU-E because existing infrastructure is sufficient to characterize groundwater quality. Three monitoring wells are proposed for decommissioning in OU-A and one well is proposed for decommissioning in OU-D due to

remediation and redevelopment of the applicable parcels to form the City of Fort Bragg Coastal Trail Property, which are also within areas with NFA status. Two monitoring wells and two piezometers are proposed for decommissioning in OU-D due to removal of the consolidation cell. Three injection wells are proposed for decommissioning in OU-D due to association with the former in-situ chemical oxidation (ISCO) treatability test. ISCO was not recommended after further evaluation. Six former water supply wells are proposed for decommissioning in OU-C and OU-D because they are no longer needed for water supply and are not used for monitoring groundwater quality.

One of the wells proposed for decommissioning is actively monitored. Completing the excavation activities will require the abandonment of currently sampled monitoring well MW-3.12. Following implementation of the excavation activities, a replacement monitoring well MW-3.12R is proposed to be installed with similar construction in the same vicinity or slightly down gradient of abandoned MW-3.12 and developed for routine sampling.

#### **Fill Four Pits with Clean Fill**

Four pits, remnants from the industrial operations, are located in the lowland area (see Attachment 5). These pits do not have wetland features, because they are deep non-vegetated pits. The applicant proposes to fill these pits with clean soil as they are an attractive nuisance that could result in injury, should people trespass and fall into one of the pits.

\*\*end of addition to the Final SEIR Project Description\*\*

### **Environmental Impact Analysis**

As noted previously, the remediation activities outlined in the OU-E RAW are not included in the SEIR. However, the activities described within the OU-E RAW will not impact the following issue areas and there will be no change to the analyses and findings presented in the SEIR: aesthetics, agricultural resources, geology and soils, land use and planning, mineral resources, population and housing, public services, recreation, and utilities and service systems. In addition, the OU-E RAW will have no new significant impacts associated with: air quality and greenhouse gases (GHGs), biological resources, cultural resources, hazards and hazardous materials, hydrology and water quality, noise, and transportation and traffic. Therefore, the impacts associated with the OU-E RAW for these issue areas will be within the scope of impacts identified in the SEIR, as described below.

#### **A. Air Quality and Greenhouse Gas Emissions**

SEIR. The SEIR noted that Mendocino County is considered a non-attainment area for particulate matter less than 10 microns in size (PM<sub>10</sub>) under the California Clean Air Act standard. However, the SEIR concluded that the dust generated during construction and grading activities and construction period air pollutant emissions for the development of the proposed project would not exceed criteria pollutant daily emissions thresholds established by the Mendocino County Air Quality Management District (MCAQMD) or the Federal Environmental Protection Agency (EPA). The SEIR concluded that Coastal Trail project activities are in accordance with the existing MCAQMD plans and rules, and also determined that there is no impact with regard to exposure of sensitive receptors to substantial objectionable odors. The SEIR provided Mitigation Measure 9 to reduce any impacts to PM<sub>10</sub> to a less-than-significant level.

The SEIR concluded that the Coastal Trail project activities will contribute a relatively small amount of Green House Gas (GHG) emissions; however the amount is not significant. Operationally there is no parking associated with the multi-use trail project, so it will not result in additional vehicular trips.

Additionally as the trail head to this facility is more than 1.5 miles from either the north or south parking lots on the associated Phase I Fort Bragg Coastal Trail project, the addition of this trail segment is not likely to lead to additional vehicular trips to either parking lot.

OU-E RAW. DTSC's excavation, backfilling, grading, and transportation activities were not analyzed within the Final SEIR.

*\*\*Therefore, the following has been added to the Air Quality analysis of the SEIR in Section 3.2.4.1 (Regulatory Setting), beginning on page 3-57 to ensure the document includes the relevant threshold information for remedial activities\*\*:*

DTSC's excavation, backfilling, grading, and transportation activities may result in temporary increases in airborne dust emissions during remediation. These activities are subject to MCAQMD Rule 1-430, which includes requirements that best management practices (BMPs) be utilized as reasonable precautions to prevent particulate matter from becoming airborne. As part of an effort to attain and maintain ambient air quality standards for PM<sub>10</sub>, MCAQMD has established rules regulating activities that can generate fugitive and permit requirements for construction projects with over 1 acre of disturbance.

*\*\*The following has been added to the Air Quality analysis of the SEIR in Section 3.2.4.3 (Environmental Consequences – Impacts – Short-term Construction Emissions), beginning at the bottom of page 3-59\*\**

In total, proposed OU-E excavation activities amount to removing approximately 3,000 cubic yards (cy). 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 (one acre = 43,560 sq ft) of disturbed area threshold for the MCAQMD. Because the OU-E RAW implementation will occur generally at the same time as Phase I of the OU-C and OU-D RAP, these projects were combined to calculate air emissions using the CalEEMod model, version 2013.2.2 (Enviro, 2013). OU-C and OU-D RAP Phase I includes the excavation and off-site disposal of approximately 360 cubic yards of soil. OU-C and OU-D Phase II will include an additional 750 to 1,500 cy of soil excavated and disposed of off-site.

Table 1 below lists 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 PM<sub>2.5</sub> and PM<sub>10</sub>. These amounts are then added to the Coastal Trail project calculations, and the cumulative amount is compared the contaminants to the MCAQMD standards (MCAQMD, Rule 1-130(s2) Definitions). Even when calculated as concurrent activities, the annual emissions are insignificant when compared to the MCAQMD standards.

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

| Annual Operational Emissions OU C and D RAP and OUE RAW combined                |                                              |                 |       |                 |                   |                  |
|---------------------------------------------------------------------------------|----------------------------------------------|-----------------|-------|-----------------|-------------------|------------------|
| 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> | 8.6                                          | 86.9            | 58.52 | 0.0945          | 5.2608            | 6.4028           |
| Cumulative Emissions                                                            | 9.9                                          | 97.27           | 58.52 | 0.0945          | 17.8108           | 19.0628          |

| Annual Operational Emissions OU C and D RAP and OUE RAW combined        |                                              |                 |     |                 |                   |                  |
|-------------------------------------------------------------------------|----------------------------------------------|-----------------|-----|-----------------|-------------------|------------------|
| 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> |
| 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: 4/7/2016

2. MCAQMD, Rule 1-130 (s2): Significant definition.

**\*\*end of addition to the Final SEIR Air Quality Analysis\*\***

Therefore, the OU-E RAW activities will not alter the impact findings for air quality presented in the SEIR. The inclusion of Mitigation Measure 9.1 will provide more protective measures for several components of Mitigation Measure 9 and will address the hazardous nature of the soil and sediment transported for the OU-E RAW activities:

**\*\*The following has been added to the Air Quality analysis of the SEIR in Section 3.2.4.6 (Avoidance, Minimization, and/or Mitigation Measures), beginning after (j) on page 3-61\*\***

#### Mitigation Measure 9.1

- o Excavation activities for remedial activities will be suspended if winds exceed 15 miles per hour (mph) sustained (for 15 minutes) or 25 mph (instantaneous gusts).
- o Soil stockpiles associated with remedial activities 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.
- o Open bodied trucks utilized for remedial activities shall be covered when used to transport materials with the potential for airborne dust.
- o The equipment (trucks, excavators) used for remedial activities will be primarily cleaned by sweeping or brushing to remove visible soil. Soil that cannot be removed by this procedure will be removed from equipment by washing in a contained area. Wash water will be collected, characterized, and appropriately disposed or recycled in accordance with applicable federal, state, and local requirements.

**\*\*end of addition to the Final SEIR Air Quality Mitigation Measures\*\***

**\*\*The following has been added to the Climate Change discussion of the SEIR on page 3-1\*\***

The MCAQWMD has not adopted a Green House Gas (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. 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. Because the OU-E RAW implementation will take place concurrently or immediately after the OU-C and OU-D RAP implementation, the green gas emissions from the OU-C and OU-D RAP implementation and the OU-E RAW implementation have been calculated and used to identify potential impacts.

DTSC's activities will be occurring prior to the City, and have been analyzed in Table 2, below. The impacts remain less than significant.

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

| Activity                                                     | CO <sub>2e</sub> pounds / day | Number of Days for Activity | Total CO <sub>2</sub> Emissions   |
|--------------------------------------------------------------|-------------------------------|-----------------------------|-----------------------------------|
| Site Preparation                                             | 1,030.8469                    | 5                           | 5,154.24 pounds (lbs.)            |
| Excavation (grading)                                         | 1,205.7861                    | 25                          | 13.67 metric tons                 |
| Hauling (round trip transport to off-site disposal facility) | 32,455.3046                   | 25                          | 368.04 metric tons                |
| Paving (site restoration including local backfill)           | 1,244.2120                    | 5                           | 2.82 metric tons                  |
| <b>Totals</b>                                                | <b>34,742.942</b>             |                             | <b>384.53 metric tons</b>         |
| <b>Applied BAAQMD Threshold</b>                              |                               |                             | <b>1,100 metric tons per year</b> |

Source: CalEEMOD analysis completed by DTSC

\*\*end of addition to the Final SEIR Climate Change\*\*

## B. Biological Resources

SEIR. The SEIR concluded that there were less-than-significant impacts to Environmentally Sensitive Habitat Areas (ESHAs), three special-status plant species with known populations within the Biological Study Area (BSA), 10 special-status animal species and/or types, and nesting birds protected under the federal Migratory Bird Treaty Act. All impacts included associated mitigation to result in a determination of less than significant.

The BSA, which includes the OU-E RAW project site, was identified as containing United States Army Corps of Engineers (USACE) jurisdictional wetlands, potential USACE wetlands, drainages, riparian areas under California Department of Fish & Wildlife (CDFW) jurisdiction, and California Coastal Commission wetlands. In addition, eight acres of ESHA wetlands were found within the Study Area, however the Coastal Trail project was designed to avoid the wetlands and any impacts were not reviewed in the SEIR. Mitigation measures were approved that will provide restoration of land adjacent to wetlands.

OU-E RAW. DTSC's excavation, backfilling, grading, and transportation activities and their impacts on biological resources were not analyzed within the Final SEIR.

\*\*Therefore, the following has been added to the Biological Environment analysis of the SEIR in Section 3.2.5.2 (Natural Communities – Environmental Consequences), beginning on page 3-71 to ensure the document includes the information related to remedial activities\*\*:

Pond and wetland ESHAs within OU-E are shown on Figures 2-3 and 2-4 from the Draft RAW (Arcadis, May 2016). Locations of excavation in relation to the ponds and wetland ESHAs is shown in Figure C-3 and C-4 of the draft OU-E RAW Excavation Implantation Plan. Many of the OU-E excavation areas are within or near these pond and wetland ESHAs. Excavations and sediment removal are

planned within USACE jurisdictional wetlands (Wetland L) and other identified wetlands in OU-E. OU-E RAW, Table 2-1 list estimates of material to be removed from the excavation sites. Excavation of sediment is planned in Ponds 2 (Wetland N), Pond 3 (Wetland O), and Pond 7 (Wetland H). In 2010, the USACE determined that wetlands N, O and H respectively, are isolated and not subject to federal jurisdiction (Section 404). The OU-E RAW involves the removal of dioxin and arsenic contaminated sediment from Pond 2 (222 cubic yards), Pond 3 (474 cubic yards), and Pond 7 (1,200 cubic yards). Ponds 1 through 4 and 7 were created to treat fly-ash containing wastewater from the former powerhouse and as a result are degraded and known to contain sediment contaminated with arsenic, lead, copper and zinc at levels that are above DTSC thresholds for humans, mammals, birds, and fish.

The OU-E RAW will result in approximately 1,500 cubic yards of contaminated soil being removed from 12 locations in the OU-E terrestrial lowland area. However, only approximately 0.05 acre of approximately 3 acres of wetlands in the terrestrial lowland is directly impacted (i.e. excavation within the wetland area) by the excavations. The OU-E RAW includes activities that protect and restore any affected wetlands.

Temporary staging or stockpile areas will not be located within or near sensitive habitats or ESHAs as described in mitigation measure 10.1, below. Because some of the soil excavation and sediment removals are within protected wetlands, permits for the project are needed from the USACE (Nationals Permit Number 38), SWRCB 401 Certification, and a Coastal Development Permit from the City of Fort Bragg or the California Coastal Commission. In addition, a Section 1602 Streambed Alteration Agreement with the CDFW is required for the OU-E RAW as it affects riparian areas and riparian wetlands. BMPs identified in the Stormwater Pollution Prevention Plan (SWPPP) 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.

On April 20, 2016, ARCADIS performed a site survey which involved visual observation of areas that could be safely accessed within the plant survey area. All excavation sites including in the OU-E RAW are located within this survey area. During the April 2016 rare plant survey activities, no special status species or areas that would likely qualify as ESHAs under the California Coastal Act were observed in the survey area. The undeveloped portions of the survey area are estimated to be covered by 70-90% non-native invasive species. Native cattail (*Typha* sp.) is one of the most abundant natives and is found in the ponded habitats within the survey area. Vegetative communities that would likely qualify as ESHAs under the California Coastal Act were not identified in the survey area.

**\*\*end of addition to the Final SEIR Biological Environment – Natural Communities\*\***

**\*\*The following has been added to the Biological Environment analysis of the SEIR in Section 3.2.5.3 (Jurisdictional Wetlands, Other Waters, and Riparian Areas – Environmental Consequences), on page 3-76, to ensure the document includes the information related to remedial activities\*\*:**

In a letter dated March 15, 2010, the US Army Corp of Engineers (USACE) informed Georgia-Pacific of their Section 404 determination for the former Georgia-Pacific Mill Site. Of the wetlands and ponds included in the OU-E RAW project, only Wetland L (0.11 acre) – the seasonal wetland ditch – was designated as a Section 404 wetland (USACE, 2010). As indicated above, the OU-E site contains manmade ponds and seasonal poor-quality wetland areas. The OUE RAW project includes the removal of approximately 24 cy of dioxin-contaminated sediment in Wetland L. The OUE RAW

will not have a substantial adverse effect on the Wetland L because of the short duration of the project (1 – 2 days), the small amount of contaminated material to be removed, and the restoration activities included in the project (ARCADIS, Draft OUE RAW Remedial Design and Implementation Plan, May 2016). There will be no direct removal of wetlands, filling, hydrological disruptions, or other impacts that would substantially adversely affect Section 404 wetlands. Indeed, the project provides beneficial effects due to the removal of approximately 24 yards of dioxin contaminated-material and subsequent full restoration and/or enhancement of any disturbed area in the riparian wetlands.

In 2010, the USACE determined that Ponds 2, 3 and 7 (wetlands N, O and H respectively) are isolated and not subject to federal jurisdiction (Section 404). In an email from the USACE to ARCADIS, dated April 7, 2016, the USACE stated that an Authorized Jurisdictional Determination is valid for 5 years and the site wetlands would require re-authorization. The April 7, 2016 email also stated that, "If the site conditions are the same it is reasonable to assume for project planning purposes that the wetlands are the same." Site conditions for wetlands N, O and H have not changed and currently isolated; therefore, not subject to Section 404 federal jurisdiction.

Additional wetlands have been identified in the OU-E lowland terrestrial area (ARCADIS, Environmentally Sensitive Habitat Area Delineation Report, April 2011). These wetlands were not included in the USACE 2010 jurisdictional determination. The USACE will make a determination for these wetlands during the 404 permit review process. While these lowland terrestrial wetlands might qualify for 404 jurisdiction, the OU-E RAW excavation areas are, with a small exception, outside of the identified wetlands (ARCADIS, draft OU-E RAW Remedial Design and Implementation Plan, figure C-3, May 2016). Three of the excavation sites within the lowland terrestrial area extend into Wetlands E1 East, E2, and E5. Less than 0.03 acres of these wetlands will be affected by the excavations. The project activities include restoration and enhancement of the wetlands; therefore, the project will not have a substantial adverse effect on the potential 404 jurisdictional wetlands in the OU-E lowland terrestrial area.

**\*\*end of addition to Final SEIR Biological Environment - Jurisdictional Wetlands, Other Waters, and Riparian Areas\*\***

Therefore, the OU-E RAW activities will not alter the impact findings for biological resources presented in the SEIR. The inclusion of the following mitigation measures will provide clarifying information for remedial activities related to the timing of OU-E RAW implementation during Summer/Fall 2016:

**\*\*The following has been added to the Biological Environment analysis of the SEIR on pages 3-72 and 3-83\*\***

**Mitigation Measure 10.1**

- o Temporary staging or stockpile areas will not be located within 100 feet of any sensitive habitats or ESHAs.

**Mitigation Measure 12.1**

- o During construction, to control erosion during and after project implementation, the applicant and contractors for the remediation activities will implement standard California Department of Transportation (Caltrans) Best Management Practices (BMPs).

#### *Mitigation Measure 26.1*

- o Prior to construction, vegetation removal shall be scheduled to avoid the typical nesting bird season (defined as occurring from March 15 to July 31 for most bird species), if feasible.
- o Prior to construction, nest surveys for Bryant's savannah sparrow shall be conducted by a qualified biologist if construction is proposed to occur within 100 ft. of potential grassland and freshwater marsh nesting habitat during the breeding season for the species (April to July).
- o Prior to and during construction, if active Bryant's savannah sparrow nests are observed, a minimum 100-ft buffer/exclusion zone delineated by highly visible flagging/stakes shall be established by a qualified biologist around each active nest until all young have fledged. During construction within 100 ft. of grassland and freshwater marsh habitats during the Bryant's savannah sparrow breeding season, a qualified biologist shall conduct weekly monitoring visits to assess the present status of breeding activity and establish exclusion zones as needed.

**\*\*end of addition to Final SEIR Biological Environment Mitigation Measures\*\***

### **C. Cultural Resources**

SEIR. The concluded the project's impact on Cultural Resources was less than significant with mitigation incorporated. The site is located in an archaeologically sensitive area, as the Fort Bragg Native American Archaeological District reflects persistent and intensive Native American use of two sites found within the Coastal Trail project area. The archaeological district is also a Traditional Cultural Property for members of the Sherwood Valley Rancheria. Given the sensitivity of the area, there is a strong potential for archaeological resources to be discovered during construction activities. The Georgia-Pacific Lumber Mill property is not eligible for listing in the CRHR or NRHP as a historic district, as 21 of the 22 historic district contributors have been demolished since 2003. There are also no remaining historic buildings within the project site.

Due to the strong presence of tribal cultural resources, the City engaged in consultation with the Sherwood Valley Band of Pomo Indians (SVBP) in 2012, 2013, and 2014 regarding Phase I of the Coastal Trail project. The City has entered into a Memorandum Of Understanding (MOU) regarding the consultation process with the SVBP, as well as entered into a Native American monitoring agreement with regard to the Coastal Trail project site. Investigations revealed, and the State Historic Preservation Officer concurred, that there are cultural resources on the project site that are eligible for inclusion in the National Register of Historic Places. In addition, since the site is a Traditional Cultural Property, there may be impacts to Culturally Significant Places which may have been used in the past and are currently used by members of the Native American community for spiritual purposes and/or resources gathering, and which are areas that may be important due to their intimate relationship with native oral tradition/oral history. Mitigation measures 2 and 3 were identified in the SEIR that will reduce the potential impacts to a less-than-significant level.

OU-E RAW. While the OU-E RAW activity locations are not within any areas where archaeological resources were identified in the City's surveys, there is still a potential for impacts because the remedial activities are within the boundaries of the Historic Mendocino Indian Reservation and the Fort Bragg Native American Archaeological District.

*\*\*The following has been added to the Cultural Resources analysis of the SEIR in Section 3.1.4.3 (Environmental Consequences – Methodology - Consultation), on page 3-39, to ensure the document includes the information related to DTSC's Native American outreach and consultation\*\*:*

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 response letters were received, and only the SVBP responded with an interest to participate in further consultation. They also requested tribal monitors at any excavation site. While engaged in ongoing consultation with DTSC, the SVBP identified the mitigation measures found within the SEIR as appropriate for mitigating potentially significant impacts for OU-E RAW activities and requested the additional mitigation measures below.

*\*\*end of addition to Final SEIR Cultural Resources analysis\*\**

Therefore, the OU-E RAW activities will not alter the impact findings for cultural resources presented in the SEIR. DTSC will be required to implement mitigation measures 2 and 3 from the SEIR, and the following mitigation measures address the hazardous nature of the soil and sediment found where tribal monitoring would occur:

*\*\*The following has been added to the Cultural Resources analysis of the SEIR in Section 3.1.4.6 (Avoidance, Minimization, and/or Mitigation Measures), on page 3-42\*\*:*

#### *Mitigation Measure 2.1*

A professional archaeologist, meeting the minimum requirements in accordance with the Secretary of Interior's Professional Qualifications, 36CFR Part 61, and a Native American tribal monitor, both Hazardous Waste Operations and Emergency Response (HazWOPER) trained and certified, will be on site during all ground disturbing activities implemented pursuant to the OU-E RAW. Copies of current HazWOPER certification will be provided to DTSC and the City prior to implementation of ground disturbing OU-E RAW activities.

#### *Mitigation Measure 2.2*

Tribal monitoring services will be required whenever construction activities include ground disturbance of native or disturbed soils, as the site includes extensive areas of fill that may have been moved in the past from archaeological sites on the property. The tribal monitoring crew size shall be determined by the Project Archaeologist. At minimum, however, there shall be one tribal monitor for every separate area of native ground disturbing activity that is simultaneously occurring at least thirty (30) meters apart. A general rule of thumb when determining if a monitor is required is that one monitor is required for every piece of operational ground disturbing equipment in an area that requires monitoring.

#### *Mitigation Measure 2.3*

During construction activities, if any archaeological artifacts or features are encountered, both the Project Archaeologist and the tribal monitors 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 an isolated item, (4) whether the find is part of a larger previously unknown archaeological site; and (5) the best course of action to avoid or minimize impacts to the resources as applicable. If the Project Archaeologist and the tribal monitor disagree about the nature of the find

and/or any of items 1 through 5 above, the professional Archaeologist will e-mail a photo to the Tribal Chairman for additional input before construction in the buffer area may resume.

- a. 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 work shall cease and the DTSC, in consultation with the tribe, shall determine the best course of action given the level and type of contamination and the type of archaeological resource. Appropriate courses of action include:
  - i. DTSC could halt excavation activities at the location, fill the excavation, and re-evaluate the remedial action of the location in the Operable Unit E Feasibility Study and Remedial Action Plan.
  - ii. Leave the contaminated soils in place and cap the site as a mitigation for the protection of the cultural resource site;
  - iii. Remove the contaminated soils. Extract and clean artifacts from the contaminated soils for the tribe to rebury in the designated cultural resource reburial area on the City's Coastal Trail property.
- b. If the find is determined to be in a disturbed context or an isolated find that is clearly not associated with an archaeological site, all cultural items shall be recorded as such and then collected, cleaned and returned to the tribe for reburial in the designated cultural resource reburial area on the City's Coastal Trail property or other area as agreed upon in writing by the parties.

**\*\*end of addition to Final SEIR Cultural Resources Mitigation Measures\*\***

#### **D. Hazards and Hazardous Materials**

SEIR. The SEIR concluded that the Coastal Trail project's potential to expose visitors to hazardous substances within the soil and sediment would be a less-than-significant impact. Mitigation was adopted that requires the Coastal Trail project components within the area known as the Mill Pond Complex to delay construction until after OU-E RAP implementation. In addition, any potential impacts to construction workers for the Coastal Trail project would be mitigated through compliance with a DTSC-approved Soil Management Plan for the site, if one is deemed necessary. Other hazardous materials may be handled during fueling and servicing of construction equipment, but the SEIR concluded that no adverse impacts would result.

OU-E RAW. DTSC's removal and restoration activities were not analyzed within the Final SEIR's Hazardous Waste/Materials section.

**\*\*Therefore, the following has been added to the Hazardous Waste/Materials analysis of the SEIR in Section 3.2.3.3 (Environmental Consequences - Impacts), on page 3-55 to ensure the document includes the information related to remedial activities\*\*:**

DTSC's removal and restoration activities primarily consist of excavation of soil or sediment to reduce overall potential risk to human health and ecological receptors, as well as restore areas with native species to improve aquatic ecosystems. OU-E areas included in the RAW include areas within the Lowland Terrestrial area, Pond 7, sediment within Ponds 2 and 3, and sediment in the Riparian area. In total, proposed OU-E excavation activities amount to removing approximately 3,500 cubic yards (cy) at depths between 0.5 and 7.5 feet below ground surface (bgs) in an approximate 24,630 square foot (sf) footprint.

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 cy. Non-

hazardous waste soils will be transported to either Keller Canyon Landfill in Pittsburg or Hay Road Landfill in Vacaville. Both Keller Canyon and Hay Road have sufficient capacity to accept all or part of this amount. If one facility were to accept all 3,500 cy it would not significantly reduce overall capacity of the facility and therefore impacts related to capacity of landfill facilities would be less than significant. If any soils are determined to be a hazardous waste, these soils will be transported to a permitted hazardous waste disposal facility. An Implementation Plan, submitted to DTSC for review and approval will detail methods and procedures for the excavation, storage, and loading of soil.

The OU-E RAW includes BMPs designed to ensure that the potential for accidents and releases of pollutants are minimized to the greatest extent possible. 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.

The OU-E RAW 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 Georgia-Pacific lumber mill site, pursuant to regulatory authority granted under Chapter 6.8, Division 20 of the Health and Safety Code. DTSC issued a Site Investigation and Remediation Order (Docket Number HAS-RAO 06-07-150) to Georgia-Pacific in 2007. However, the proposed project is not expected to result in significant impacts related to risks of exposure of contaminants to the environment or the public. Overall, the proposed project is protective of human health and the environment by removing contaminated soil and sediment from locations where it could come into contact with the public or wildlife. Therefore, the proposed project would not expose people or the environment to a significant hazard related to hazardous materials sites subject to Cortese List requirements.

*\*\*end of addition to Final SEIR Hazardous Waste/Materials analysis\*\**

Therefore, the OU-E RAW project activities will not alter the impact findings for hazards/hazardous materials presented in the SEIR. The following mitigation measures will provide clarifying information to address the hazardous nature of the soil and sediment excavated as part of the OU-E RAW project:

*\*\*The following has been added to the Air Quality analysis of the SEIR in Section 3.2.4.6 (Avoidance, Minimization, and/or Mitigation Measures), beginning after Mitigation Measure 9.1 on page 3-61\*\**

#### *Mitigation Measure 9.2*

- o Temporary staging areas will be set up adjacent to OU-E RAW 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.
- o Visible soils carried onto Cypress Street and/or SR 1 via trucks, earth moving equipment, water, or other means that occurs from remediation activities shall be promptly removed.

*\*\*end of addition to Final SEIR Air Quality Mitigation Measures\*\**

## E. Hydrology and Water Quality

SEIR. The SEIR concluded that there would be no impact to water quality standards, waste discharge requirements, and the project would not otherwise substantially degrade water quality. In addition, there would be no alteration of the existing drainage pattern of the Site, contribution of runoff which would result in exceeding the capacity of existing or planned stormwater drainage systems, or contribution of substantial additional sources of polluted runoff. The project site is located within a 500 year floodplain, except for the beach berm and the beach which are subject to Flood Zone V, consisting of coastal flood with velocity hazard (wave action). To mitigate for potential impacts that would expose people to potential coastal flooding, the SEIR includes measures to install signage to warn people of high surf conditions during storm events along all improvements on the Beach Berm, and to temporarily close the berm section of the project trail and access to the beach in high surf conditions.

OU-E RAW. DTSC's removal and restoration activities were not analyzed within the Final SEIR's Water Quality and Stormwater Runoff section.

*\*\*Therefore, the following has been added to the Water Quality and Stormwater Runoff analysis of the SEIR in Section 3.2.1.3 (Environmental Consequences), on page 3-44, to ensure the document includes the information related to remedial activities\*\*:*

Wastewater generated by the remedial activities at OU-E is 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 or taken from a hydrant. Pudding Creek reservoir has an existing pump system that can fill the onsite Pond 5 if water is needed during low-flow times. 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 Stormwater Pollution Prevention Permit (SWPPP) for the closed Georgia-Pacific Mill Site. The proposed project is not expected to generate any wastewater discharge.

The removal of sediment from Ponds 2, 3, and 7, and from the drainage ditch located in the Riparian Area will require a Section 404 permit from the USACE, a 1602 Agreement Certification from CDFW, and a Section 401 Certification from NCRWQCB. These permit requirements will ensure that the project does not substantially alter the existing drainage pattern or create substantial erosion or siltation. Excavation of the soil in the terrestrial area also will not substantially alter the existing drainage pattern or create substantial erosion or siltation – all areas would be restored to preconstruction. In addition, because the stockpiled soils are temporary and would be occurring during the dry season, they would not alter existing drainage patterns. If any stockpiles remain after the start of the rainy season, Georgia-Pacific will follow the requirements established for stockpile management and stormwater control measures specified in the closed Georgia-Pacific mill site SWPPP.

*\*\*end of addition to Final SEIR Water Quality and Stormwater Runoff analysis\*\**

Therefore, the OU-E RAW activities will not alter the impact findings for hydrology and water quality

presented in the SEIR.

## **F. Noise**

SEIR. The SEIR concluded that noise generated by the proposed Coastal Trail project would be short term and construction-related (paving, haul trucks for restoration materials, etc.). Construction will not include pile driving or use of explosives for demolition, activities which are most likely to exceed noise thresholds and result in intensive vibration. No long term noise impacts would result from the proposed project, and no mitigation measures are required. Therefore, there is no impact with regard to noise.

OU-E RAW. Noise-generating equipment that would be used at the site, which would affect noise levels in areas near the work site, includes 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.

*\*\*Therefore, the following has been added to the Noise analysis of the SEIR in Section 3 on page 3-2 to ensure the document includes information related to remedial activities\*\*:*

Hours of operation for remedial activity equipment shall be limited to between 7:30am and 5:00pm and noise from the associated activities will comply with the Noise Element of the City's General Plan, Table N-5; 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.

In addition, earth-moving equipment (i.e. front loaders, backhoes, tractors, compactors, and rollers) would be used for the proposed remediation activities at OU-E. Because vibrations associated with earth moving equipment would be localized, the implementation of the OU-E RAW would not generate excessive ground borne vibrations or ground borne noise that would be noticeable to the nearest sensitive receptor, located approximately 1000 feet offsite.

*\*\*end of addition to Final SEIR Noise analysis\*\**

Therefore, the OU-E RAW activities will not alter the impact findings for noise presented in the SEIR.

## **G. Transportation and Traffic**

SEIR. The SEIR concluded that the Coastal Trail project activities would result in no impact with regard to transportation and traffic. The project will not provide any direct automobile access or additional parking for the site, and would not create a substantial increase in traffic in relation to existing traffic load and capacity or exceed a level of service standard for congestion of roadways. It was concluded that activities would not interfere with emergency access, result in inadequate parking capacity, or conflict with alternative transportation.

OU-E RAW. The Final SEIR did not include an analysis of the truck trips required to implement the O-E RAW.

*\*\*Therefore, the following has been added to the Traffic and Transportation analysis of the SEIR in Section 3.1.2 (Impacts – Short-term (construction) Impacts), on page 3-20, to ensure the document includes information related to remedial activities\*\*.*

The OU-E RAW would require approximately 175 trucks trips to haul excavated soil and sediment from the site for transport to an approved off-site disposal area. These 175 truck trips are in addition to the 60 to 90 truck trips that are included in the OU-C and OU-D Remedial Action Plan implantation. This would increase traffic on local streets by approximately 25 trucks per day over a six week phased construction period (OU-C and OU-D RAP and OU- E RAW combined). This is based on excavation of 3,500 cy of contaminated soil and sediments and use of heavy-duty diesel trucks with a capacity to hold approximately 20 cy 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. 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, which would also avoid both morning and afternoon traffic peaks. 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.

Traffic related to OU-E RAW implementation would be short-term in nature and limited in scope. Current Level of Service for the transportation route is level-of-service (LOS) B and the volume-to-capacity ratio for this area is identified at approximately 0.61 – 0.70 indicating that it is at an acceptable level. Traffic related to OU-E RAW implementation 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

*\*\*end of addition to Final SEIR Traffic and Transportation analysis\*\**

Therefore, the OU-E RAW activities will not alter the impact findings for transportation and traffic presented in the SEIR.

#### **IV. CONCLUSION**

The OU-E RAW will not alter the impact findings and mitigation measures for air quality and GHGs, biological resources, cultural resources, hazards and hazardous materials, hydrology and water quality, noise, and transportation and traffic presented in the SEIR. With implementation of the OU-E RAW activities, adoption of the clarifying mitigation measures outlined above, and DTSC's incorporation of the relevant mitigation measures from the SEIR, there will be no new significant impacts and no substantial increase in the severity of any impacts identified in the SEIR. The mitigation measures which are included in Section III are measures which address an impact already reviewed and mitigated within the SEIR, and merely provide clarifying information or slight modifications to address the hazardous soil and sediment that is the focus of the OU-E RAW. Therefore, the impacts for the OU-E RAW are within the scope of impacts identified in the SEIR, and the SEIR adequately addressed all potentially significant environmental impacts of the project.

Based on the above, an Addendum is the appropriate CEQA document for the OU-E RAW pursuant to the CEQA Guidelines [Cal. Code Regs., tit. 14, § 15164(b)] because none of the conditions described in Section 15162 of the CEQA Guidelines calling for the preparation of a subsequent EIR or negative declaration have occurred. This addendum has appropriately disclosed the

potential impacts from the OU-E RAW and will be included as part of the CEQA record for the Coastal Restoration and Trail Project. A Notice of Determination for this Addendum to the SEIR will be filed with the California State Clearinghouse within the State of California Office of Planning and Research.

**CERTIFICATION**

I hereby certify that the statements furnished above and in the exhibits, attached or incorporated by reference, present the data and information required for this 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.

|                                                  |               |
|--------------------------------------------------|---------------|
| _____<br>Signature                               | _____<br>Date |
| _____<br>Julie Pettijohn/Unit Chief/510-540-3843 |               |

- Attachments:
- Appendix A – CalEEMod model for the OUE RAW Implementation
  - Appendix B – Rare Plant Survey in OUE-E Soil and Sediment Removal Work Areas
  - Appendix C – Section 404 Jurisdictional Delineation Map

# Appendix A

CalEEMod model, Version 2013.2.2 (Environs, 2013)  
for the OUE RAW Implementation, April 7, 2016

# Appendix B

Rare Plant Survey in OUE-E Soil and Sediment  
Removal Work Areas, (Arcadis, April 19, 2016)

# Appendix C

Section 404 Jurisdictional Delineation Map,  
Appendix A of letter to Mr. Justin Semion, WRA  
Environmental Consultants from Ms. Jane M. Hicks,  
Chief, Regulatory Division, United States Army Corps  
of Engineers, March 15, 2010.