

MEETING DATE: August 10, 2016

PREPARED BY: Marie Jones

PRESENTED BY: Marie Jones

AGENDA ITEM SUMMARY REPORT

APPLICATION NO.: Coastal Development Permit 3-16 (CDP 3-16)

OWNER: Georgia-Pacific LLC

APPLICANT: Dave Massengill, Georgia-Pacific LLC

PROJECT DESCRIPTION: Coastal Development Permit (CDP 3-16) for remedial activities primarily composed of hot spot excavation in Operable Unit E at the former Georgia-Pacific Lumber Mill located on the western edge of the City of Fort Bragg. The proposed project would consist of soil excavation and disposal of approximately 3,500 cubic yards of contaminated soils in Operable Unit E (OU-E). While OU-E consists of approximately 12 acres of man-made ponds and seasonal wetland areas and 45 terrestrial acres, the proposed removal area is relatively small at 24,630 square feet or about half an acre. The primary removal action areas (RAAs) include the following: OU-E Lowland, Southern Ponds (1-4), Ponds 7, and Riparian area. Confirmation samples will be collected during excavation activities to evaluate remaining site conditions; if testing warrants additional soil removal to achieve clean-up goals additional material will be removed. Excavation activities will require approximately 151 truckloads to move excavated soil and sediment to off-site disposal at a nonhazardous waste facility. The Ponds and the Riparian area will be reseeded and monitored to restore native plants. The project also includes the removal/decommissioning of 57 monitoring and injection wells that are no longer sampled as well as six former water supply wells that are no longer used. The project will also include filling in four pits and re-establishing one monitoring well after construction is complete. Removal and restoration activities are expected to take approximately 20 days to complete. The project includes a wetland mitigation and monitoring plan which will be followed over a five year period to ensure that the wetland established as mitigation for project impacts to Ponds 2, 3 and 7, is successful per Coastal Act and Fish and Wildlife requirements.

LOCATION: 90 West Redwood Avenue

ZONING: Timber Resources Industrial (TI)

ENVIRONMENTAL DETERMINATION: SEIR Addendum

SURROUNDING LAND

NORTH: Georgia-Pacific Mill Site, Noyo Headlands Park
EAST: State Route One, City of Fort Bragg
SOUTH: Georgia-Pacific Mill Site, Noyo Headlands Park, Noyo Harbor
WEST: Wastewater Treatment Plant, Noyo Headlands Park and Pacific Ocean

BACKGROUND

The Georgia Pacific Mill Site occupies an approximately 323 acre site on the coastline of the City of Fort Bragg (See Figure 1-1 of Attachment 1). According to historical records, the timber mill in Fort Bragg began operations in 1885. Georgia-Pacific (GP) acquired the facility and began operations in 1973. In November 2002, lumber production operations ceased at the facility. Since then, GP has been engaged in the process of decommissioning the site. This has involved dismantling buildings, removal of equipment, extensive site investigations and remediation activities.

In October 2003 and October 2004, the City approved two Coastal Development Permits (CDP 1-03; CDP 2-04) authorizing demolition of 17 structures on the Mill Site totaling over 200,000 SF of buildings.

In 2005, the City approved CDP 3-05 authorizing: 1) the removal of all building foundations for the above listed structures; 2) additional investigation of soils and ground water; and, 3) if necessary, interim remedial measures (IRMs).

On March 26, 2009, the City received a request from the applicant for issuance of an emergency permit for the demolition of the badly damaged Truck Loading Shed on the former Georgia-Pacific Wood Products Facility site. The structure had suffered from serious damage due to driving winds, which were causing the roof to sag dangerously and the wall to bulge out. On June 20, 2009, the Planning Commission approved an after-the-fact Coastal Development Permit for the truck shed demolition.

In 2013 Georgia-Pacific requested a CDP to authorize the removal of the above-ground portions of 38 buildings, as the site no longer had a functioning fire suppression systems and many of the structures were in bad condition and in danger of collapse in heavy winds. The Planning Commission approved the Coastal Development Permit and 323,000 SF of structures were demolished during the summer of 2013.

In 2015 Georgia-Pacific requested a CDP to remove approximately 1,108 to 1,858 cubic yards of contaminated soils and materials in OU-C and OU-D. The areas requiring remediation (excavation and disposal of contaminated soils) include the following locations:

- 1) Former AST and MES/Pilot Study (contaminant is TPHd);
- 2) Former Dip Tank (contaminant is Dioxin and PCP);
- 3) Rail Lines East (contaminant is lead);
- 4) Kilns (contaminant is TPHd and B(a)P); and
- 5) Planer #2 (contaminant is TPHd and B(a)P).

Additional activities, covered under the CDP include placing a cover/fill of soil and gypsum at the Former AST and Former MES/Pilot Study to address soil vapor contaminants. In February of 2016 the Planning Commission approved the Coastal Development Permit for this remediation activity. The Applicant is seeking to implement this project at the same time as the proposed project (CDP 3-16).

The California State Department of Toxic Substances Control (DTSC) oversaw the development of the Remedial Action Workplan (RAW) and all the supporting studies for the proposed activities within Operable Unit E (OU-E), which include:

- 1) The Remedial Investigation (RI) Report Operable Unit E– which summarizes the extensive sample collection and analysis process for constituents of concern.
- 2) The Revised Baseline Human Health and Ecological Risk Assessment (BHHERA), completed in 2013. The BHHERA estimates risks within OUE for both potential future human receptors and ecological receptors based on current industrial use and foreseeable land use scenarios. It includes child and adult residents, commercial/ industrial workers, construction workers and maintenance/ utility workers, recreational receptors, plants, soil invertebrates, and representative wildlife receptors (birds and mammals).
- 3) The Removal Action Workplan (RAW), which is described in detail below, defines the remediation steps required to remove hot spots.

In July of 2016 the City and DTSC completed an Addendum to the Fort Bragg Coastal Trail Phase II Subsequent SEIR for the implementation of the RAW for OU-E.

PROJECT DESCRIPTION

The project consists of four inter-related activities:

1. Implementation of the OUE RAW (Attachment 1);
2. Construction of a 0.584 acre (17,000 S)F wetland and implementation of a five year wetland monitoring plan for mitigation to project impacts to Army Corp and Coastal Act wetlands (Attachment 2);
3. Decommissioning of 57 wells that are no longer in service and re-establishing one well upon completion of the remediation; and
4. Filling of four pits (non-wetland) with clean soil.

Each of these project components is described in more detail below.

Implementation of the OU-E Remedial Action Workplan (RAW)

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.

The proposed 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. The 3,500 cubic yards (cy) of chemically-impacted soil will be transported to and disposed of at 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.

For all of the excavation activities below, sidewall and bottom confirmation samples will be collected during the excavations, and if additional problematic contamination is found the excavation area will be expanded. 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. Trucks will transport soil and sediment for disposal to a nonhazardous waste disposal facility.

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 2-7 through 2-11 of the OU-E RAW, respectively). The three excavations of B(a)P TEQ amounts 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 Soil Contamination hot spot excavation area amounts to approximately 194 cy with an excavation depth of 6 feet bgs. Excavation is expected to take 14 - 18 days.

Ponds 2 and 3 (Southern Ponds) Sediment

Sediment in Ponds 2 and 3 are 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 2-8 of the OU-E RAW). 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. 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 2-13 of the OU-E RAW). 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.

Implementation is expected to take 1-2 days.

Upon completion of the remediation activities, DTSC would allow for recreational use (from the perspective of the clean-up level and not zoning) throughout Operable Unit E.

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 continue 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 management plan (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 Contaminants of Interest (COI 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 for 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.

CONSISTENCY WITH GENERAL PLAN & COASTAL LAND USE AND DEVELOPMENT CODE (CLUDC)

Land Use Consistency. The project is consistent with Timber Resources Industrial (IT) zoning as it includes the remediation of a Lumber Mill site which was used for the manufacture and storage of wood products. No new uses are proposed as part of this CDP application.

The proposed remediation is consistent with the draft Specific Plan for the site which identified potential future uses for the site and was developed through a three year process with the participation and input from the community, City Council, City Staff, and Georgia-Pacific. DTSC used the draft Specific Plan to set appropriate clean up levels for the site as it is the only documentation of potentially foreseeable future land uses for the site. Thus implementation of the RAW would result in the remediation of the site in a manner consistent with the potential future land uses envisioned for OUE in the Specific plan, namely open space and recreation. Recreational uses are currently allowed within the Timber Resources Industrial zoning districts. The proposed remediation is consistent with both the draft Mill Site Specific Plan and the CLUDC land use tables.

Furthermore as the remediation clean-up levels are geared towards open space uses, the applicant has proposed to place a deed restriction on the property limiting its use to open space. The Coastal Commission has requested that a Special Condition be placed on the Coastal Development Permit that secures the OU-E lowlands site for open space uses, in order to protect and preserve the wetland establishment area. Staff recommends special condition 1 to achieve this goal.

Special Condition 1: Georgia-Pacific shall record a deed restriction on the OU-E Lowlands (the area illustrated as "A OUE Lowland" in Figure 2-2 of Attachment 1) limiting use of this area to Open Space.

Public Access. The property is currently fenced and there are no prescriptive easements across the property. The site is not a public access location, nor is it specified as a future vertical access location in the LCP. The site is the proposed location for phase II of the Fort Bragg Coastal Trail. The remediation of the site is a pre-requisite to establishing future public access to the ocean in this location.

Visual Resources. The proposed implementation of the Remedial Action Workplan will improve the visual resources of the project area by removing monitoring wells, constructing new wetlands, and decommissioning various pits in the lowland area. The project is consistent with visual resource protection policies of the Coastal General Plan and the regulations of the CLUDC.

Hazards. 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 GP 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. Overall, the proposed project is protective of human health and the environment as it will result in the removal of contaminated soil and sediment from locations where they could come into contact with the public or wildlife. The Removal Action Work Plan:

1. Details the existing nature and extent of contamination;
2. Evaluates an array of remediation alternatives for each area of concern;
3. Selects the preferred remedial alternative for each area of concern;
4. Describes excavation procedures, confirmation sampling, biological and air quality monitoring, waste disposal and restoration activities.

The City's CLUDC does not explicitly regulate remediation activities. The City relies on DTSC for the regulation and remediation standards for contaminated sites. Thus Special Condition 2 is included below to ensure that the OUE RAW approval process is completed prior to City approval of the grading permit.

Special Condition 2: DTSC must approve the OUE RAW, and the OUE RAW must be approved by City Council under its Polanco authority, prior to City approval of the Grading Permit for the implementation of the OUE RAW.

The applicant also proposes the removal/decommissioning of 57 monitoring, injection and/or supply wells that are no longer sampled and/or used. The applicant has not yet received approval from DTSC for the removal/decommissioning of the monitoring wells. The City asked that these components of the project be included in the CDP application so that all proposed activities can be reviewed under one CDP as preferred by the zoning ordinance. Staff recommends Special Condition 3 to ensure that the applicant obtain DTSC approval to decommission the wells prior to commencement of the work.

Special Condition 3: Prior to removal or decommissioning of monitoring and injection wells, the applicant shall obtain approval from DTSC.

The project will also include filling in four pits. This activity will remove a physical safety hazard from the site, and while not required by the CLUDC this activity is in conformance with the CLUDC, as none of the sites are wetlands.

Wetland Impacts and Mitigation Requirements. The proposed implementation of the Remedial Action Workplan (Attachment 1) and the Operable Unit E Wetland Mitigation and Monitoring Plan (Attachment 2) must conform with a number of Coastal General Plan wetland policies and CLUDC regulations as described below and as conditioned through this permit and mitigated through the SEIR Addendum (Attachment 3).

Policy OS-1.3: Development in ESHA Wetlands: Diking, Filling, and Dredging of open coastal waters, wetlands, estuaries, and lakes shall be permitted where there is no feasible less environmentally damaging alternative, and where feasible mitigation measures have been provided to minimize adverse environmental effects, and shall be limited to the following uses:

- 1) New or expanded port, energy, and coastal-dependent industrial facilities, including commercial fishing facilities.
- 2) Maintaining existing or restoring previously dredged depths in existing navigational channels, turning basins, vessel berthing and mooring areas, and boat launching ramps.
- 3) New or expanded boating facilities and the placement of structural pilings for public recreational piers that provide public access and recreational opportunities.
- 4) Incidental public service purposes, including but not limited to burying cables and pipes or inspection of piers and maintenance of existing intake and outfall pipelines.
- 5) Restoration purposes.
- 6) Nature study, aquaculture, or similar resource dependent activities.

Policy OS-1.3 allows for removal of soil (dredging) from a wetland only where “there is no feasible less environmentally damaging alternative.” In order to protect human health and protect ecological health the removal of dioxin contaminated soils is required. As noted in the BHERRA and the RAW, the levels of dioxin contamination within Ponds 2, 3 and 7 and the wetland L (a riparian ditch) are above screening levels and have the potential to result in excess cancer deaths if not removed (see Figures 2-3, 2-4, 2-12, 2-13, and 2-14 of the OUE RAW). The Department of Toxics and Substance Control (DTSC) considered: 1) leaving the contaminated soils in place; 2) capping the contaminated soils; and 3) removing the materials to a landfill. DTSC determined that only removal of the materials would be protective of human health and ecological health. Thus there is no feasible less environmentally suitable alternative to the removal of these contaminated sediments from these wetlands.

Additionally Policy OS-1.3 requires that mitigation measures be provided to minimize adverse environmental impacts. The Coastal Act requires that new wetlands be created and restored in cases in which wetlands are impacted by development, even if that impact is a temporal disruption of the wetland’s function.

- Proposed OU-E Removal Action activities are anticipated to impact approximately 0.064 acre of waters of the United States (0.055 acre of wetland habitat and 0.009 acre of stream habitat), 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. These 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.
- Compensatory mitigation activities proposed include in-kind, in-place restoration of wetland, stream, and upland riparian habitats at a 1:1 ratio and establishment of an additional 0.548 acre of wetlands in the portion of OU-E immediately north of Pond 8 (OU-E Lowlands). The proposed restoration and 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. These proposed mitigation ratios meet the intent of the policy.

Section 17.58.040(B) 1 of the CLUDC requires on-site mitigation ratio of 4 to 1 for functional loss of wetland acreage or functional capacity. The proposed project will not result in a loss of wetland acreage. The loss to functional capacity is a temporal loss, which will be remedied with restoration. In consultation with the Coastal Commission, the project’s wetland creation rate of 2.2 acres created for every 1 acre with temporary impacts is sufficient wetland mitigation. Coastal Commission staff has requested, and special condition 4 is offered to

require, higher performance standards for the percent of native vegetation cover achieved over the five year timeframe for the established wetland (see Table 3 of Attachment 2).

Special Condition 4: The applicant shall achieve native vegetation percent cover for the Seasonal/Seed Wetland (Wetland E-6 and Establishment Area) as follows: Year 1, 25% native plant cover; Year 2, 40% native plant cover; Year 3, 60%; Year 4, 70%, and Year 5, 80% native plant cover.

As proposed through the Mitigation and Monitoring Plan the project complies with most of the remaining wetland mitigation requirements of the CLUDC which include:

- 1) Locating compensatory wetland adjacent to impacted wetlands;
- 2) Revegetation with site appropriate species;
- 3) Developing a wetland site that respects topography and hydrology; and
- 4) Timing the project for success. This project will happen just before the rainy season, which will help ensure success.

The only requirement that the project cannot meet is the requirement to reuse existing vegetation and soil in mitigation areas. The existing soil and plants cannot be reused for the restoration activities because they are contaminated with hazardous materials. They will be removed from site and disposed of in a land fill.

The CLUDC section 17.58.050C requires the applicant to submit a detailed implementation and monitoring plan which has been provided (Attachment 2). The plan conforms to the requirements of the code. Special Condition 5 will ensure that the plan is implemented.

Special Condition 4: The applicant shall implement, concurrently with the OUE RAW, the wetland restoration, creation and monitoring work tasks in the Operable Unit E Mitigation and Monitoring Plan and the SEIR Addendum.

The proposed project includes some activities which will take place within an ESHA buffer and policy OS-1.10 applies in a very limited way to the project.

Policy OS-1.10: Permitted Uses within ESHA Buffers. Development within an Environmentally Sensitive Habitat Area buffer shall be limited to the following uses:

- a. Wetland Buffer.
 - i. Uses allowed within the adjacent Wetland ESHA pursuant to Policy OS-1.3.
 - ii. Nature trails and interpretive signage designed to provide information about the value and protection of the resources
 - iii. Invasive plant eradication projects if they are designed to protect and enhance habitat values.
- b. Riparian Buffer.
 - i. Uses allowed within the adjacent River and Stream ESHA pursuant to Policy OS-1.5.
 - ii. Uses allowed within the adjacent ESHA pursuant to Policy OS-1.6.
 - iii. Buried pipelines and utility lines.
 - iv. Bridges.
 - v. Drainage and flood control facilities.

The proposed project will include limited use of equipment associated with the remediation and mitigation activities within the buffer. As these activities are required to achieve the restoration, these activities are permissible within the buffer.

Additionally, the City received a comment letter from the Water Board with regard to this project. Comments from the letter included special conditions related to the Wetland Mitigation and Monitoring Plan and are included here for consistency as a Special Condition of the CDP.

Special Condition 5: Implement the requirements of the water board, which include:

1. If riparian trees are planted to replace removed trees greater than 4" diameter at breast height (dbh), than 85% of individual replacement trees must survive through the end of the 5 year monitoring period.
2. Conduct the final wetland re-delineation at the end of the spring growing season for optimal vegetation identification and to document optimal vegetative cover.

Biological Resources. A rare plant survey was completed for the project in April of 2016 and is attached (Attachment 7). The survey was conducted in all terrestrial areas slated for soil disturbance and found evidence of no rare plants. No additional measures are necessary for the protection of rare plants. Additionally, a number of biological resources studies have been completed for the entire Mill Site over the years which have included:

1. Avian Habitat Utilization And Impact Assessment, WRA 2006
2. Assessment of Environmentally Sensitive Habitat Areas, WRA 2005
3. Delineation of Potential Section 404 Jurisdictional Wetlands and Waters, WRA 2005
4. Biological Assessment, WRA 2005

Staff has reviewed all of these reports and relevant mitigation measures to address potential impacts to avian, mammalian, and amphibian organisms of special concern have been included in the SEIR Addendum.

Archaeological and Cultural Resources. A cultural resources investigation, completed in 2003, by TRC indicated a high potential for cultural resource sites on the Mill site, although all known cultural resource sites are located either on the bluff areas within the City's Coastal Trail property or on the northern portion of OUC in Parcel 1 and Parcel 2. No known cultural resources are located in the proposed excavation areas. However unknown historic or prehistoric resources could be located within the proposed areas of excavation. The City of Fort Bragg and DTSC engaged in consultation with the Sherwood Band of Pomo Indians (SVBP) as required by State law and the City's MOU with SVBP. Staff from the City and DTSC met with the tribal council on two occasions and with tribal staff on-site to identify and address cultural resources concerns of the tribe and to develop specific mitigation measures to address those concerns. The attached SEIR Addendum includes the requested mitigation measures of the tribe. Additionally, Arcadis prepared a Cultural Resources Coordination Plan to memorialize the agreements of the consultation process. The Cultural Resources Coordination Plan will be implemented as part of the OUE RAW project in order to protect and mitigate against impacts to cultural resources both of these activities are required for the effective protection of cultural resources on the site. The Cultural Resources Coordination Plan has not been attached to this staff report because it is a confidential document and

cannot be shared with the general public. It may be reviewed by Planning Commissioners at the Community Development Department.

Special Condition 6: The applicant shall implement the Cultural Resources Coordination Plan and the Cultural Resources Mitigation Measures of the SEIR Addendum concurrently with the RAW.

These measures insure that the project complies with Policy OS-4.1 below and the archaeological protection regulations of the CLUDC.

Policy OS - 4.1. Preserve Archaeological Resources. New development shall be located and/or designed to avoid archaeological and paleontological resources where feasible, and where new development would adversely affect archaeological or paleontological resources, reasonable mitigation measures shall be required.

Erosion and Water Quality. The project involves the removal of soils and sediments which are contaminated with hazardous materials. In order to improve post-construction storm water quality and infiltration on the mill site, the applicant has proposed to: 1) back fill and revegetate the upland sites that have been excavated and 2) backfill the removed sediments and restore the wetland sites. The proposed plans and the SEIR Addendum both include well defined strategies and mitigations to ensure that the project does not result in erosion or impacts to water quality and will result in compliance with Policy OS -3.1 and water quality regulations from the CLUDC.

The proposed project includes storage of materials for dewatering, drying and characterization prior to removal. The project Workplan includes a detailed description of storage pile cover techniques and dewatering techniques to be used to ensure that water from the dewater process flows back into wetlands and to ensure that dust is not produced from the pile during drying activities. However, due to the timing of the proposed excavations, there is some chance that excavation or some portion of the project may occur during the wet season. The CLUDC prohibits grading between November 1st and March 30th unless the City Engineer determines that the soil conditions at the site are suitable and sedimentation control measures are adequate. Staff recommends Special Condition 8 in the event that project activities extend into the rainy season.

Special Condition 7: The applicant shall obtain permission from the City Engineer to continue work into the rainy season and the applicant shall comply with the stormwater management mitigation measure from the SEIR Addendum.

Air Quality. The City of Fort Bragg is located in the North Coast Air Basin and is within the jurisdiction of the Mendocino County Air Quality Management District (AQMD). Mendocino County is an “attainment area” for local, state and federal air quality standards except for suspended particulate matter (PM10). Excavation activities may result in temporary increases in airborne dust emissions. The applicant’s contractors may be required to obtain local air quality permits or state mobile equipment permits. The contractors for the project are encouraged to Call AQMD at (707)463-4354 with any questions. The AQMD will require that a fugitive dust permit be issued for this project prior to the issuance of a demolition permit. This

will establish measures to prevent dust from traveling off-site. Potential adverse impacts to air quality will be addressed through the following Special Condition:

Special Condition 8: Particles generated in the remediation process will be minimized via dust suppression control. The applicant shall comply with the air quality mitigation measures required in the SEIR Addendum.

Environmental Review

The City of Fort Bragg served as the Lead Agency under CEQA and prepared an SEIR for Phase II of the Coastal Trail. In order to avoid segmentation, as Resource Agency for the remediation, DTSC and the City prepared an SEIR Addendum for the implementation of the OUE RAW (see Attachment 3). The SEIR Addendum tiers off of the Coastal Trail SEIR for Phase II of the Coastal Trail.

The DTSC is in the final review and approval phase of the OUE Removal Action Workplan (RAW). However, in order for DTSC to approve the OUE RAW, the SEIR Addendum (CEQA document) must be adopted. Since the City is the Lead Agency for the Coastal Trail Subsequent SEIR and the SEIR Addendum, the City must complete its action before DTSC approves the RAW. Thus the SEIR Addendum must be adopted by the City concurrently with the CDP for the project, in advance of DTSC's approval of the OUE RAW. The applicant can begin implementation of the project only after the RAW is adopted by DTSC and City Council. Special Condition 10 has been added to ensure that this occurs.

Special Condition 10 requires that all of the mitigation measures of the SEIR Addendum are implemented.

Special Condition 9: All mitigation measures of the SEIR Addendum and the Mitigation and Monitoring Plan shall be implemented with the OUE RAW, as detailed below:

1. The project contractor, on behalf of the project applicant, shall prepare a dust control plan for construction activities at the project site pursuant to the requirements of the MCAQMD. The project contractor shall be responsible for ensuring that all adequate dust control measures are implemented in a timely manner during all phases of construction and maintenance activities at the project site. The dust control plan shall include the following measures:
 - a. Water shall be applied by means of truck(s), hoses, and/or sprinklers as needed prior to any land clearing or earth movement to minimize dust emissions.
 - b. All material excavated, stockpiled, or graded shall be sufficiently watered to prevent fugitive dust from leaving the property boundaries or causing a public nuisance of an ambient air standard. Watering should occur at least twice daily, however frequency of watering shall be based on the type of operation, soil, and wind exposure.
 - c. All on-site vehicle traffic shall be limited to a speed of 15 miles per hour on unpaved roads.
 - d. All trucks hauling soil, sand, or other loose materials on public roads will be covered or required to maintain at least two feet of freeboard.
 - e. All land clearing, grading, earth moving, and/or excavation activities shall be suspended as necessary, based on site conditions, to prevent excessive windblown dust when winds are expected to exceed 20 miles per hour.
 - f. Excavation and grading activities shall be suspended when sustained winds exceed 25 mph, instantaneous gusts exceed 35 mph, or dust from construction might obscure driver visibility on public roads.
 - g. All inactive portions of the construction site, including soil stockpiles, shall be covered, seeded, or watered until a suitable cover is established. Alternatively, apply City approved nontoxic soil

stabilizers (according to manufacturers' specifications) to all inactive construction areas (previously graded areas that remain inactive for four consecutive days). Acceptable materials that may be used for chemical soil stabilization include petroleum resins, asphaltic emulsions, acrylics, and adhesives that do not violate Regional Water Quality Control Board (RWQCB) or California Air Resources Board (CARB) standards.

h. Paved areas adjacent to construction sites (the abandoned runway) shall be swept or washed as required to remove excess accumulations of silt and/or mud, which may have resulted from grading and construction activities at the project site.

i. The project proponent shall re-establish ground cover on all disturbed portions of the project site through seeding and watering in accordance with the City of Fort Bragg Grading Ordinance and Local Coastal Program, which requires the application of native seed or terminal seed.

j. A publicly visible sign shall be posted with the telephone number and person to contact regarding dust complaints. This person shall respond and take corrective action within 24-hours. The telephone number of the MCAQMD shall also be visible to ensure compliance with the Fugitive Dust Emissions requirements.

k. Construction workers shall park in designated parking area(s) to help reduce dust emissions.

2. 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).

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.

Open bodied trucks utilized for remedial activities shall be covered when used to transport materials with the potential for airborne dust.

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.

3. 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.

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.

4. If cultural materials are discovered during construction, all earth-moving activity within 100 feet of the immediate discovery area will halt until a qualified archaeologist can assess the nature and significance of the find.

If human remains are discovered, State Health and Safety Code Section 7050.5 states that further disturbances and activities shall cease in any area or nearby area suspected to overlie remains, and the County Coroner contacted. Pursuant to Public Resources Code Section 5097.98, if the remains are thought to be Native American, the coroner will notify the THPO who will then notify the Most Likely Descendent (MLD). At this time, the person who discovered the remains will contact the project archaeologist so that they may work with the MLD on the respectful treatment and disposition of the remains. Further provisions of PRC 5097.98 are to be followed as applicable.

The City shall require Native American monitoring of all construction activities that will result in grading or movement of native soils in cultural resource areas as identified in the Data Collection Plan.

5. 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.

6. 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.

7. 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.

i. 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 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:

1. 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.
2. Leave the contaminated soils in place and cap the site as mitigation for the protection of the cultural resource site;
3. 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.

ii. 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."

8. During construction, permanent and temporary impacts to ESHA natural communities shall be avoided/minimized to the extent feasible. The ESHA natural communities which have the potential to be disturbed by the project shall be shown on site plans. Areas in which grading or other disturbance is to occur shall be defined on-site by readily identifiable barriers that will protect the surrounding native habitat areas. Construction equipment and other vehicles shall be prevented from entering ESHA natural communities to be avoided through the use of exclusion zones or other barriers.

9. Prior to construction, the applicant will prepare a Hazardous Materials Response Plan or equivalent to allow for a prompt and effective response to any accidental spills. All workers will be informed of the importance of preventing spills and of the appropriate measures to take should a spill occur. All project-related hazardous materials spills within the project site will be cleaned up immediately by the contractor. Spill prevention and cleanup materials will be on-site at all times during construction.

10. During construction, to control erosion during and after project implementation, the applicant and contractors will implement standard Best Management Practices (BMPs).

11. During construction, the cleaning and refueling of equipment will occur only within a designated staging area and at least 65 ft from wetlands, other waters, or other aquatic areas. This staging area will conform to BMPs applicable to attaining zero discharge of stormwater runoff. At a minimum, all

equipment and vehicles will be checked and maintained on a daily basis to ensure proper operation and avoid potential leaks or spills.

12. During construction, trash will be contained, removed from the work site, and disposed of regularly by the contractor. Following construction, all trash and construction debris will be removed from work areas.

13. During construction, any disturbance within jurisdictional wetlands or other waters will take place between June 15 and October 31 in any given year, when the surface water is likely to be dry or at seasonal minimum. Deviations from this work window are not permitted by the City's Certified LCP.

14. If any native shoulderband snails are observed during ground disturbance activities in suitable habitat, such snails shall be relocated to suitable habitat outside of the area of disturbance to avoid/minimize injury or mortality.

15. Prior to construction, the City shall obtain a letter of permission or equivalent authorization from CDFG to relocate NRLF and other SSC species from work areas encountered during construction within the ADI as necessary. Qualified biologists shall capture and relocate any NRLF (if present) or other SSC species to suitable habitat outside of the area of impact. Observations of SSC species or other special-status species shall be documented on CNDDDB forms and submitted to CDFG upon project completion.

16. Prior to and during construction, if project activities cannot feasibly avoid the typical nesting bird season (defined as occurring from March 15 to July 31 for most bird species), weekly bird surveys of the project areas that will be under construction shall be conducted by a qualified biologist with experience in conducting breeding bird surveys, beginning 30 days prior to the disturbance of suitable nesting habitat. If a protected native bird nest is found, clearance/construction will not occur within an appropriate buffer/exclusion zone (determined by a qualified biologist) delineated by highly visible flagging/stakes until August 1, or until any active nests are vacated and there is no evidence of a second attempt at nesting.

17. Prior to and during construction, if active northern harrier nests are observed, a minimum 300-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 300 ft of grassland and freshwater marsh habitats during the northern harrier breeding season, a qualified biologist shall conduct weekly monitoring visits to assess the present status of breeding activity and establish exclusion zones as needed.

18. Prior to and during construction, if active white-tailed kite nests are observed, a minimum 300-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.

19. 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).

20. 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.

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

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. 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). 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.

22. 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).

PLANNING COMMISSION ACTION

1. Hold a hearing on the CDP 3-16, close the hearing, deliberate, and consider: 1) approving the Fort Bragg Coastal Trail SEIR Addendum; and 2) approving the Coastal Development Permit (CDP3-16) based on the findings and subject to the conditions cited.

ALTERNATIVE ACTION

2. Hold a hearing, close the hearing, deliberate without a decision, provide direction to staff and revisit the application at the next scheduled meeting for a decision and the addition of any new findings.
3. Hold the hearing, and continue the hearing to a date certain if there is insufficient time to obtain all input from all interested parties. At the date certain the Commission may then deliberate and make a decision.

RECOMMENDATION

1. **Staff recommends certification of the SEIR Addendum and approval of CDP 3-16 for the implementation of: 1) the Removal Action Workplan for Operable Unit E; 2) the Cultural Resources Coordination Plan; 3) the Wetland Mitigation and Monitoring Plan; and 4) the decommissioning of various monitoring wells and pits of the Georgia-Pacific Mill Site, based on the findings and subject to the conditions cited below:**

FINDINGS

1. The remediation of OUE is necessary to eliminate safety concerns stemming from past contamination on the Mill Site. The remediation will remove a condition of blight on the property;
2. The proposed project is consistent with the purpose and intent of the Timber Resources Industrial (IT), as well as all other applicable provisions of Title 17 of the Fort Bragg Municipal Code, and applicable provisions of the Fort Bragg Municipal Code in general;
3. The proposed project is in conformity with the certified Local Coastal Program (LCP);

4. The site is physically suitable in terms of design, location, shape, size, operating characteristics, and the provision of public and emergency vehicle (e.g., fire and medical) access and public services and utilities (e.g., fire protection, police protection, potable water, schools, solid waste collection and disposal, storm drainage, wastewater collection, treatment, and disposal, etc.), to ensure that the type, density, and intensity of use being proposed would not endanger, jeopardize, or otherwise constitute a hazard to the public interest, health, safety, convenience, or welfare, or be materially injurious to the improvements, persons, property, or uses in the vicinity and zoning district in which the property is located;
5. As proposed, the development will not have any unmitigated adverse impacts to any known historical, archaeological or paleontological resource;
6. The proposed development will not have any significant adverse impacts on the environment within the meaning of the California Environmental Quality Act as provided by an SEIR Addendum (to the Fort Bragg Coastal Trail Phase II SEIR) that has been prepared for the project; and
7. The proposed development is in conformity with the public access and public recreation policies of the LCP and Chapter 3 of the California Coastal Act.

COASTAL DEVELOPMENT PERMIT FINDINGS

1. The proposed development as described in the application and accompanying materials, as modified by any conditions of approval, is in conformity with the City of Fort Bragg's certified Local Coastal Program and will not adversely affect coastal resources;
2. The project is located between the first public road and the sea, that the project is in conformity with the public access and recreation policies of Chapter 3 of the Coastal Act of 1976 (commencing with Sections 30200 of the Public Resources Code);
3. Feasible mitigation measures and/or alternatives have been incorporated to substantially lessen any significant adverse effects of the development on the environment;
4. The proposed use is consistent with the purposes of the zone in which the site is located;
5. The proposed development is in conformance with the City of Fort Bragg's Coastal General Plan;
6. The proposed location of the use and conditions under which it may be operated or maintained will not be detrimental to the public health, safety, or welfare, or materially injurious to properties or improvements in the vicinity; and
7. Services, including but not limited to, water supply, sewage disposal, solid waste, and public roadway capacity have been considered and are adequate to serve the proposed development; and
10. Supplemental findings for projects located between the first public road and the sea required by Section 17.56.070 of this Development Code.

SPECIAL CONDITIONS

1. Special Condition 1: Georgia-Pacific shall record a deed restriction on the OU-E Lowlands (the area illustrated as "A OUE Lowland" in Figure 2-2 of Attachment 1) limiting use of this area to Open Space.
2. Special Condition 2: DTSC must approve the OUE RAW, and the OUE RAW must be approved by City Council under its Polanco authority, prior to City approval of the Grading Permit for the implementation of the OUE RAW.

3. Special Condition 3: Prior to removal or decommissioning of monitoring and injection wells, the applicant shall obtain approval from DTSC.
4. **Error! Reference source not found.** The applicant shall achieve native vegetation percent cover for the Seasonal/Seed Wetland (Wetland E-6 and Establishment Area) as follows: Year 1, 15% native plant cover; Year 2, 30% native plant cover; Year 3, 40%; Year 4 50%, and Year 5, 60% native plant cover. Additionally the applicant shall target the following invasive plants for targeted control from Wetland E-6 and the Establishment Area and insure that the total cover of these very invasive plants is less than 5% of these areas for each year of the five year monitoring period: *Carpobrotus chilensis* (sea fig), *Carpobrotus edulis* (iceplant), *Foeniculum vulgare* (fennel), *Carduus pycnocephalus* (Italian thistle), *Cirsium vulgare* (bull thistle), *Pseudognaphalium luteoalbum* (Jersey cudweed), *Sonchus asper* ssp. *Asper* (prickly sow thistle), *Sonchus oleraceus* (common sow thistle), *Brassica nigra* (black mustard), *Raphanus sativus* (wild radish), *Myriophyllum aquaticum* (parrot's feather), *Cortaderia jubata* (Pampas grass), *Cotoneaster pannosus* (silver-leaf cotoneaster) and *Rubus armeniacus* (Himalayan blackberry)
5. Special Condition 4: The applicant shall implement, concurrently with the OUE RAW, the wetland restoration, creation and monitoring work tasks in the Operable Unit E Mitigation and Monitoring Plan and the SEIR Addendum.
6. Special Condition 5: Implement the requirements of the water board, which include:
 1. If riparian trees are planted to replace removed trees greater than 4" diameter at breast height (dbh), then 85% of individual replacement trees must survive through the end of the 5 year monitoring period.
 2. Conduct the final wetland re-delineation at the end of the spring growing season for optimal vegetation identification and to document optimal vegetative cover.
7. Special Condition 6: The applicant shall implement the Cultural Resources Coordination Plan and the Cultural Resources Mitigation Measures of the SEIR Addendum concurrently with the RAW.
8. Special Condition 7: The applicant shall obtain permission from the City Engineer to continue work into the rainy season and the applicant shall comply with the stormwater management mitigation measure from the SEIR Addendum.
9. Special Condition 8: Particles generated in the remediation process will be minimized via dust suppression control. The applicant shall comply with the air quality mitigation measures required in the SEIR Addendum
10. Special Condition 9: All mitigation measures of the SEIR Addendum and the Mitigation and Monitoring Plan shall be implemented with the OUE RAW

STANDARD CONDITIONS

1. This action shall become final on the 11th working day following the Coastal Commission's receipt of the Notice of Final Action unless an appeal to the Coastal Commission is filed pursuant to Chapter 17.61.063 and 17.92.040. This action is appealable to the California Coastal Commission pursuant to Chapter 17.92.040.
2. The application, along with supplemental exhibits and related material, shall be considered elements of this permit, and compliance therewith is mandatory, unless an amendment has been approved by the City.
3. This permit shall be subject to the securing of all necessary permits for the proposed development from City, County, State and Federal agencies having jurisdiction. All plans submitted with required permit applications shall be consistent with this approval.

4. This permit shall be subject to revocation or modification upon a finding of any one or more of the following:
 - (a) That such permit was obtained or extended by fraud.
 - (b) That one or more of the conditions upon which such permit was granted have been violated.
 - (c) That the use for which the permit was granted is so conducted as to be detrimental to the public health, welfare or safety or as to be a nuisance.
 - (d) A final judgment of a court of competent jurisdiction has declared one or more conditions to be void or ineffective, or has enjoined or otherwise prohibited the enforcement or operation of one or more conditions.
5. This permit is issued without a legal determination having been made upon the number, size or shape of parcels encompassed within the permit described boundaries. Should, at any time, a legal determination be made that the number, size or shape of parcels within the permit described boundaries are different than that which is legally required by this permit, this permit shall become null and void.
6. This Coastal Development Permit approval shall lapse and become null and void 24 months from the date of approval unless before the passing of 24 months, construction has commenced and is diligently pursued towards completion or an extension is requested and obtained.

DISTRIBUTION

- Tom Lanphar, DTSC
- Cristin Kenyon, Coastal Commission

ATTACHMENTS

Attachment 1: Removal Action Work Plan Operable Unit E, Arcadis, May 2016
Attachment 2: Operable Unit E Mitigation and Monitoring Plan (Wetland), Arcadis, July 2016
Attachment 3: Addendum to the Final Subsequent EIR for the Fort Bragg Coastal Restoration and Trail Phase II Project, City of Fort Bragg & DTSC, July 2016
Attachment 3A: SEIR Addendum Mitigation and Monitoring Plan, City of Fort Bragg, July 2016
Attachment 4: Proposed Well Decommissioning Map
Attachment 5: Figure of Pits to be filled
Attachment 6: Site Photos
Attachment 7: Rare Plant Survey OUE