CITY OF FORT BRAGG
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ENVIRONMENTAL CHECKLIST FORM & MITIGATED NEGATIVE DECLARATION

PROJECT TITLE: **Georgia Pacific Mill Site - Demolition of 38 above ground structures**

LOCATION: 90 West Redwood Avenue, Fort Bragg
(APNs 008-010-26, 008-020-09, 008-053-34, 008-151-22, 008-161-08, 018-010-67, 018-020-01, 018-030-42, 018-040-52, 018-120-43/-44, 018-430-01/-02/-07/-08)

OWNER/APPLICANT: Georgia Pacific Corporation

PROJECT DESCRIPTION: Coastal Development Permit to authorize demolition of the following above ground structures on the GP Mill Site: Dry Shed #2, Glue Lam, Resaw #6, Dry Shed #5, Planner #0, Construction Engineering, Generator Shed, Dry Kilns (5), Kiln Awnings (5), Radio Room, Guard Shack #2, Yard Office, Break Room, Valve Houses, Pump Houses and above ground pump fixtures(3), Time Clock Shed, Veneer Building, Shipping Office, Scale Office, Tally Shack, Main Packing Shed, Chemical Storage Sheds, Green Houses, Chalet, Corporation Yard Shed, fire hose storage building, and fire hydrants and covers (multiple).

GENERAL PLAN DESIGNATION: Timber Resources Industrial

ZONING: Heavy Industrial

LEAD AGENCY: City of Fort Bragg
416 North Franklin Street
Fort Bragg, CA 95437

CONTACT: Marie Jones, Community Development Director
(707) 961-1807; mjones@fortbragg.com

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" or "Less than Significant with Mitigation Incorporated" as indicated by the checklist on the following pages:

- ☐ Aesthetics
- ☑ Biological Resources
- ☑ Hazards & Hazardous Materials
- ☐ Mineral Resources
- ☐ Public Services
- ☐ Utilities/Service Systems
- ☐ Agricultural Resources
- ☐ Cultural Resources
- ☑ Hydrology/Water Quality
- ☐ Noise
- ☐ Recreation
- ☐ Mandatory Findings of Significance
- ☑ Air Quality
- ☐ Geology/Soils
- ☐ Land Use/Planning
- ☐ Population/Housing
- ☐ Transportation/Traffic

DETERMINATION (To be completed by the Lead Agency)

On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment and a NEGATIVE DECLARATION will be prepared.

☑ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

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

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

February 14, 2013

Marie Jones *Date*
Community Development Director

PROJECT DESCRIPTION

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

In October 2003 and October 2004, the City approved two coastal development permits (CDP 1-03; CDP 2-04)) authorizing demolition of the following structures on the Mill Site:

Table 1: GP 2004 Demolition CDP

Map Number	Building Description	Construction Material	Approximate Construction Date	Square Footage
1	Sawmill	Wood & Metal	1970s	80,000 sf
2	Chipper Screen	Wood and metal	1985	680 sq. ft.
3	Sorter Building	Metal	1995	42,000 sq. ft.
4	Hog Building	Wood and Metal	1975	1,750 sq. ft.
5	Planer	Wood & Metal	1960s	163,248 sf
11	Compressor Building	Metal	1945	1,460 sq. ft.
12	Mill One Hog Building	Wood	Unknown	2,880 sf
13	Power House	Wood & Metal	1940s	33,600 sf
14	Fuel Barn	Metal	1940s	16,800 sf
15	Truck Dump Building	Wood & Metal	Unknown	192 sf
16	Water Treatment Building	Metal	1970s	3,200 sq. ft.
17	Boiler Fuel Oil Building	Metal	1990s	1,680 sf

The locations of the structures are shown on Attachment 2. 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).

In February of 2013, G-P requested a coastal development permit to authorize the removal of most of the above ground portion of 38 buildings on the site as enumerated in table 2 below:

Table 2: Georgia-Pacific Buildings Proposed for Demolition

Building Description	Materials	Size (Square Feet)	Location (see Map)
Dry Shed #2	Wood	18,392	F-10
Glue Lam	Wood	17,400	F-10
Resaw #6	Wood	27,200	F-10
Dry Shed #5	Wood	43,200	D-9
Firehose Shed	wood	16	D-9
Planner #50	Wood	28,710	E-9
Construction Engineering	Wood	11,926	E-9
Generator Shed	Wood	64	E-9
Dry Kilns (5)	Wood & cinder block	48,960	D-8
Kiln Awnings (5)	Wood	40,320	D-8
Radio Room	Wood, steel	16	D-9
Guard Shack #2	Wood	16	C-7
Yard Office	Wood	2,640	E-9
Break Room	Wood	960	E-8
Valve Houses	Metal	384	E-8
Pump Houses (3)	Metal	576	F-10
Time Clock Shed	Wood	96	D-6
Veneer Building	Wood	17,484	E-6
Shipping Office	Wood	1,036	D-6
Scale Office	Wood	126	D-5
Tally Shack	Wood	48	E-5
Main Packing Shed	Metal	5,151	D-3
Chemical Storage Sheds	Wood	236	D-3
Green Houses	Steel Pipe & Fibergrass	58,000	C-3
Chalet	Wood	437	C-3
Corporation Yard Shed	Wood	64	C-3

Demolition activities will occur between the hours of 6:00 a.m. and 5:00 p.m. Monday through Friday. Heavy equipment will be necessary for the demolition of site structures.

The majority of the building materials are anticipated to be recycled. Material which is not recycled will be properly disposed of at an off-site disposal facility. Foundations of the structures will remain in place so as to limit the soil disturbance and debris generated at the site. Construction debris generated during demolition activities will be placed on paved areas and covered with plastic sheets to prevent dust emissions and control erosion. The edge of the liner will be elevated to prevent precipitation run-on and runoff. Georgia-Pacific has conducted a lead-based paint (LBP) and asbestos containing material (ACM) survey of all site structures constructed prior to 1980. Prior to demolition, all identified ACM and LBP will be removed by an approved contractor. All work will be performed in accordance with industry standards and the

rules and regulations of the U.S. EPA, federal and California OSHA, and an Air Quality Permit stipulations.

Other Permitting Requirements. Prior to commencement of the proposed project, the following permits are required:

- Coastal Development Permit (City/Coastal Commission);
- Section 404 Nationwide Permit (Army Corps of Engineers);
- Dust Prevention and Control Plan (City Engineer);
- Runoff Mitigation Plan (City Engineer);
- NPDES Permit and Waste Discharge Identification Number (Regional Water Quality Control Board);
- Storm Water Pollution Prevention Plan (Regional Water Quality Control Board);
- Hazardous Materials Handling Plan; and
- Mendocino County Air Quality Management District permits.

Comments Received from Federal, State and Local Agencies. This application was referred to federal, State and local agencies for review and comment on February 6, 2013. No agency responses were received as of February 19, 2013.

ENVIRONMENTAL CHECKLIST

A discussion of each item on the checklist is provided below. Measures that are incorporated into G-P's Work Plan for the foundation removal, removal of geophysical anomalies and IRMs are listed in plain text. Additional measures which are recommended by City staff to ensure that mitigations reduce the potential impacts to a less than significant level are shown in *italicized text.*

I. Aesthetics

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a. Have a substantial adverse effect on a scenic vista?				X
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				X
c. Substantially degrade the existing visual character or quality of the site and its surroundings?				X
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?				X

The City's certified Local Coastal Program identifies all lands on the west side of Highway 1 as a scenic corridor. Fort Bragg Municipal Code Section 18.61.028(B) calls for new development to minimize the alteration of landforms, to be visually compatible with the character of the surrounding area, to be sited and designed to protect views to and along the ocean and scenic coastal areas, and wherever feasible, restore and enhance visual quality in visually degraded areas. The removal of the 38 derelict and

visibly deteriorating buildings on the Mill Site will improve scenic views of the coast through the removal of large and tall buildings that block views to the coast and the ocean from highway 1 and public rights of way within the City of Fort Bragg.

II. Agricultural Resources

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				X
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?				X
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?				X
d) Result in the loss of forest land or conversion of forest land to non-forest use?				X
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?				X

The project site is located on a coastal terrace and the overlying soils are very sandy with minimal nutrients available. In addition, the site is subjected to high winds and salt spray, making it unsuitable for agricultural use. The site does not have a history of agricultural use and is presently developed with industrial uses. The proposed demolition activities would not result in the conversion of farmland to non-agricultural uses.

III. Air Quality

Where available, the significance criteria by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a. Conflict with or obstruct implementation of the applicable air quality plan?				X
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?			X	

c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?		X		
d. Expose sensitive receptors to substantial pollutant concentrations?			X	
e. Create objectionable odors affecting a substantial number of people?				X

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).

Demolition activities may result in temporary increases in airborne dust emissions. 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. On February 28, 2003, the AQMD indicated that the current Title V permit for Georgia-Pacific will be cancelled on July 1, 2003 and that a Facility Wide Dust Control Permit is necessary for the demolition project.

Potential adverse impacts to air quality will be reduced to a level of insignificance with the incorporation of the following mitigation measure:

(1) Prior to issuance of demolition permits, the applicant shall secure a Facility Wide Dust Control Permit from the Mendocino County Air Quality Management District. All demolition activities shall be conducted in accordance with the requirements of the permit. Georgia-Pacific will also be required to submit an Asbestos Notification Form to the AQMD for each building to be demolished. Particles generated in the demolition process will be minimized via dust suppression control. A Dust Suppression Officer will be assigned to the facility during the dismantling process.

IV. Biological Resources

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a. Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or US Fish and Wildlife Service?			X	

b.	*Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or US Fish and Wildlife Service?*		X		
c.	*Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?*			X	
d.	*Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?*				X
e.	*Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?*		X		
f.	*Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?*				X

The City's Local Coastal Program (LCP) requires protection of all environmentally sensitive habitat areas, including rare and endangered plant species and wetlands, from any significant disruption of habitat values. The LCP requires establishment of a minimum 50-foot wide buffer area to protect environmentally sensitive habitat unless it can be demonstrated that 50 feet is unnecessary to protect the resources of the habitat area. There are two types of environmentally sensitive habitat within the project area: wetlands and rare plants.

An Army Corp of Engineers certified Jurisdictional Determination was prepared in 2009 by WRA to identify the extent of jurisdictional wetlands on the Mill Site. The studies identify the Mill Pond as a jurisdictional wetland. The study identifies 21 potential jurisdiction wetlands on the site. However, only five of the buildings slated for demolition are located with 50 feet of a wetland and all of the remaining buildings are located more than 100 feet from a jurisdictional wetland.

- Pump House # 2 and pump house #3 are located within 5 feet of US Army Core of Engineers jurisdictional wetlands. In order to remove these structures from the banks of these wetlands Georgia-Pacific will need to apply for a Section 404 nationwide permit. A section 401 permit may also be required.
- Pump House #1, #2 and #3 are located within 5 feet of Coastal Act wetlands (see *Delineation of Potential Section 404 Jurisdictional Wetlands and Waters*). However on one side of each structure there are lands which are very disturbed, paved or graveled and have no habitat value. Demolition of the building must be staged from the disturbed areas and a fenced should be established to protect the adjacent wetland habitat.
- Both Valve houses are located within 100 feet of Wetland C (a freshwater seep) along the northern slop of the depressed area adjacent to the Mill Pond.

The following mitigations would offset potential impacts to these two wetland resources on the site:

(1) Prior to demolition of pump house #2 and pump house #3, Georgia-Pacific must apply for and obtain a section 404 nationwide permit.

(2) Temporary construction fences shall be constructed between Pump House #1, #2 and #3 and adjacent wetlands to protect them from erosion, siltation and accidental construction impacts. Additionally, tarps shall be hung below each pump house to catch any falling debris that could otherwise fall into these wetland areas during demolition. Upon completion of the demolition projects any impacts to the wetlands will be restored. City of Fort Bragg restoration staff will examine the site upon completion of the demolition project and provide direction if any reseeding or restoration activities would be required.

(3) The Valve houses are located in the middle of wetlands. In order to protect these wetland seep areas from damage the removal and demolition of these structures shall occur by hand. No mechanical equipment may be used in the demolition of these building. City of Fort Bragg restoration staff will examine the site upon completion of the demolition project and provide direction if any reseeding or restoration activities would be required.

(4) No equipment, materials or stockpiles shall be located within 50 feet of any of the wetlands illustrated in Appendix A of the Delineation of Potential Section 404 Jurisdictional Wetlands and Waters.

(5) All stockpiles areas, including hazardous waste storage areas and non-hazardous soil, debris and concrete storage areas shall be clearly delineated on the demolition permit (aka Building Permit) and shall be located a minimum of 50' from delineated wetlands and other Environmentally Sensitive Habitat Areas. Any change in the location of storage areas after issuance of the demolition permit shall require approval by the City Engineer.

The mitigations enumerated above are sufficient to reduce impacts to these wetlands to less than significant.

The City's adjacent property includes rare plant populations, therefore no materials shall be staged or stored nor work with heavy equipment permitted within 100 feet of the City's property line in order to avoid any impacts to rare plants.

(6) No materials shall be staged or stored, nor work with heavy equipment permitted, within 100 feet of the City's property line in order to avoid any impacts to rare plants.

V. Cultural Resources

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a. Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?			X	
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?				X
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?				X
d. Disturb any human remains, including those interred outside of formal cemeteries?				X

The following Archaeological Surveys have been prepared for the Georgia Pacific Lumber Mill:

1. Descantes, Christopher, and Carole Denardo
   2007 Updated Preliminary Excavation Results from Glass Beach 1, 2, and 3 and Geophysical Areas 3 and 10 at the Georgia-Pacific Former Sawmill, Fort Bragg, California.
2. Descantes, Christopher, Carole Denardo, and Bruno Texier
   2007 Final Archaeological Investigations at Eight Sites & Five Removal Areas, Fort Bragg, Mendocino County, California.
3. Texier, Bruno, and Carole Denardo
   2010 Final Archaeological Extended Phase I Studies within the Northern Portion of the Georgia-Pacific Corporation Property, Fort Bragg, Mendocino County, California. Submitted to ARCADIS, Petaluma, CA.
4. Frank, Kruger, and Carole Denardo
   2008 Final Archaeological Monitoring and Limited Testing—Field Year 2007 for the Georgia-Pacific Corporation Wood Products Manufacturing Facility Closure Project, Fort Bragg, Mendocino County, California.
5. Parker, Greig, and Christopher Drover
   2003 Archaeological Survey of the Georgia Pacific Lumber Mill, Fort Bragg, California.
   Parker, Greig, Ruth Nichols, and Christopher Drover
   2007 Phase II Determination of Significance, Standing Structures, Georgia Pacific Lumber Mill, Fort Bragg, California.

   Because these report contains sensitive information that is exempt from public disclosure under both state and federal law (i.e., it contains information identifying location of archaeological remains), it is treated as confidential and is not attached to this Mitigated Negative Declaration.

   These reports identify a number of cultural resource sites distributed over large portions of the property. Specific mitigation measures are identified to protect, test and preserve archaeological resources. The cultural resources investigation included consultation with

Native Americans. The results of the Native American consultation are recorded in confidential Appendix F of the Archaeological Survey.

The results of the initial cultural resources investigation indicated that the entire property has achieved significance as an historic district under the California Register of Historic Places. TRC prepared two follow-on studies: Phase II Determination of Significance-Standing Structures and Site Specific Treatment Plan for Cultural Resources. All buildings on the site have been catalogued using large format photography and this is considered sufficient mitigation to reduce the impact to less than significance for the removal of these above ground structures.

As the project includes no grading or removal of foundations there will be no impacts to below-ground cultural resources. However, in the event that above ground structure removal results in unanticipated below ground disturbance, the following mitigation measure is required to reduce impacts to less than significant.

(1) In the event prehistoric archaeological resources (marked by shellfish remains, flaked and ground stone tools, fire affected rock, human bone, or other related materials) are unearthed accidentally during demolition, all work in the vicinity of the site shall cease immediately, the Community Development Department shall be notified, and the proper disposition of resources shall be accomplished as required by LUDC Section 18.50.030(D).

VI. Geology and Soils

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.				X
ii. Strong seismic ground shaking?				X
iii. Seismic-related ground failure, including liquefaction?				X
iv. Landslides?				X
b. Result in substantial soil erosion or the loss of topsoil?				X

c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?				X
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?				X
e. Have soils incapable of adequately supporting the use of septic tanks or alternative water disposal systems where sewers are not available for the disposal of waste water?				X

As the proposed project will result in the removal of above ground structures that may well currently be a seismic risk, the risk to people from exposure to effects related to seismic shaking will be reduced by the project. The project site is relatively flat and no landslides are possible from the site. As the removal of structures will occur from largely paved and compacted gravel surfaces no soil erosion is anticipated to occur as a result of this project.

VII. Green House Gas Emissions

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			X	
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?				X

The proposed project will result in truck traffic and the utilization of heavy equipment for the demolition and transportation of demolition debris; however the amount of truck traffic (350 loads) and the extent of the demolition project do not qualify the project as a significant project under ABAG standards.

The City recently adopted a Climate Action Plan which did not address climate change impacts of demolition projects and thus the proposed project does not conflict with the City's Climate Action Plan.

VIII. Hazards and Hazardous Materials

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact

a.	*Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?*		X		
b.	*Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?*			X	
c.	*Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?*				X
d.	*Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?*				X
e.	*For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport, would the project result in a safety hazard for people residing or working in the project area.*				X
f.	*For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?*				X
g.	*Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?*				X
h.	*Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?*				X

The proposed project involves the removal of potentially hazardous materials (lead based painted surfaces and asbestos covered surface) from the site. While the removal of materials could result in potential short-term exposure of people to hazardous materials, the demolition project will be undertaken by a licensed operator and conducted in accordance with established standards and requirements which are intended to ensure the proper handling and disposal of hazardous materials.

The following measures will reduce the potential hazards associated with the project to a level of insignificance:

(1) All work involving structures with asbestos and lead containing paint will be performed in general accordance with local, state, and federal rules and regulations. A certified and trained contractor will be utilized to secure the necessary permits and conduct the required abatement activities. All of the work involving asbestos is associated with aboveground structure removal and shall conform with the requirements outlined in APPENDIX A: ASBESTOS ABATEMENT TECHNICAL SPECIFICATIONS, AMEC, February, 2013, submitted by the applicant as part of the Coastal Development permit application. All of the

work involving lead-based paint is associated with aboveground structure removal and shall conform with the requirements outlined in APPENDIX B: HAZARDOUS AND REGULATED MATERIALS TECHNICAL SPECIFICATIONS AMEC, February, 2013

(2) Stockpiles of concrete without stains or evidence of hazardous waste will be transported offsite to a recycling waste disposal facility.

(3) Wherever possible, broken concrete and other demolition debris will be stockpiled on areas with improved asphalt or concrete surface. Potentially hazardous waste will be stored in a Potentially Hazardous Waste Storage Area that will be specifically selected for each investigation area.

(4) The applicant will follow the submitted Transportation Plan that describes the protocol and procedures to protect human health and the environment during transportation activities to remove debris with hazardous materials.

VIII. Hydrology and Water Quality

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a. Violate any water quality standards or waste discharge requirements?			X	
b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?				X
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?				X
d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?		X		
e. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?				X
f. Otherwise substantially degrade water quality?				X
g. Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?				X

h.	*Place within a 100-year flood hazard area structures which would impede or redirect flood flows?*				X
i.	*Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?*				X
j.	*Inundation by seiche, tsunami, or mudflow?*				X

The project involves the removal of above ground structures some of which are contaminated with hazardous materials. Removal of some of the very large above ground structures has the potential to change stormwater flows on the site as the stormwater that currently flows from roof tops into below surface drains will likely sheet flow across the property to the coast, where it may contribute to erosion. The following measures will ensure that erosion, sedimentation and water quality impacts associated with the project are reduced to a level of insignificance.

(1) Heavy equipment will be utilized to remove and stockpile concrete building materials and wooden building materials. Material suspected to be impacted with COPCs (Constituents of Potential Concern) will be stockpiled separate from non-impacted material.

(2) The following Best Management Practices to control, reduce or prevent discharge of pollutants from demolition and material handling activities:
   (a) Material or products will be stored in manufacturer's original containers.
   (b) Storage areas will be neat and orderly to facilitate inspection.
   (c) Check all equipment for leaks and repair leaking equipment promptly.
   (d) Perform major maintenance, repairs, and washing of equipment away from the excavation site.
   (e) Designate a completely contained area away from storm drains for refueling and/or maintenance work that must be performed at the site.
   (f) Clean up all spills and leaks using dry methods (absorbent materials/rags).
   (g) Dry sweep dirt from paved surfaces for general clean-up.
   (h) Train employees in using these BMPs.
   (i) Avoid creating excess dust when breaking concrete. Prevent dust from entering waterways.
   (j) Protect storm drains using earth dikes, straw bales, sand bags, absorbent socks, or other controls to divert or trap and filter runoff.
   (k) Shovel or vacuum saw-cut slurry and remove from the site.
   (l) Remove contaminated broken pavement from the site promptly. Do not allow rainfall or runoff to contact contaminated broken concrete.
   (m) Schedule demolition work for dry weather periods when possible.
   (n) Avoid over-application by water trucks for dust control.
   (o) Cover stockpiles and other construction materials with heavy duty plastic. Protect from rainfall and prevent runoff with temporary roofs or heavy duty plastic and berms.

IX. Land Use and Planning

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a. Physically divide an established community?				X
b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?				X
c. Conflict with any applicable habitat conservation plan or natural community conservation plan?				X

The Georgia-Pacific Mill Site is designated as Timber Resources Industrial (TRI) in the Coastal General Plan. The proposed project would not change the existing use of the property and is consistent with the land use policies of the LCP and General Plan.

X. Mineral Resources

Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				X
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?				X

The site does not contain any known mineral resources, nor will the proposed project result in the removal of any minerals from the site.

XI. Noise

Would the project result in:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?				X

b.	*Exposure of persons to or generation of excessive groundbourne vibration or groundbourne noise levels?*				X
c.	*A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?*				X
d.	*A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?*			X	
e.	*For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?*				X
f.	*For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?*				X

The project site is zoned for industrial uses and the structures which are proposed for demolition are located a considerable distance from any other uses. There are no "sensitive noise receptors" in the vicinity and noise generated by the demolition activities is not anticipated to create any problems. However demolition will result in a temporary increase in ambient noise levels and therefore construction activities will be limited in time from 8:00am to 5:00pm, Monday through Friday.

XII. Population and Housing

Would the project:		Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
a.	*Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?*				X
b.	*Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?*				X
c.	*Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?*				X

The proposed project would not induce population growth either directly or indirectly. It does not involve the development of new housing units or the displacement of existing units. The site is presently zoned for Heavy Industrial uses

XIII. Public Services

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
Fire protection?			X	
Police protection?				X
Schools?				X
Parks?				X
Other public facilities?				X

The project would have no effect on public services except for fire protection. The project includes the removal of all fire suppression infra-structure from the Mill Site. However, this equipment is not currently operational because the primary water pump for firefighting does not meet new air quality standards and so has been decommissioned as part of this project. The removal of all standing structures on the site, save for the training building and Dry Shed #4, will eliminate much of the fire danger. The fire marshal has determined that the training building and Dry Shed #4 could be served with the water on a fire truck and since these are the only remaining standing structures on the site, truck water should be sufficient to extinguish a blaze in these buildings.

Additionally the Fire Marshal indicated that the risk of harm would be reduced to less than significant if the following mitigations were incorporated into the project.

(1) Georgia-Pacific shall designate a person to be the fire prevention program superintendent, who shall be responsible for the fire prevention program and ensure that it is carried out through completion of the project. The fire prevention program superintendent shall have the authority to enforce the provisions of CH 14 C.F.C and other provisions as necessary to secure the intent of CH 14 C.F.C. Where guard service is provided the fire prevention program superintendent shall be responsible for the guard service.

(2) Approved vehicle access for firefighting shall be provided to all demolition sites. Vehicle access shall be provided by either temporary or permanent roads capable of supporting vehicle loading under all weather conditions. Vehicle access shall be provided from Cypress Gate, Redwood Gate and Elm Street Gate during demolition activities. Such access may be secured by providing the Fire Department with keys to these gates. Access roads shall be kept clear of obstructions to provide for rapid fire response during demolition activities. Upon completion of demolition activities, fire access shall be maintained on the site until permanent fire apparatus access roads are available.

(3) Structures under demolition shall be provided with not less than one approved portable fire extinguisher in accordance with section 906 and sized for not less than ordinary hazards as follows:
1. At each floor level where combustible materials have accumulated.
2. In every demolition materials storage area
3. Additional portable fire extinguishers shall be provided where special hazards exist including but not limited to the storage and use of flammable and combustible liquids.

XIV. Recreation

	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?				X
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				X

The project will have no effect on parks or recreational facilities. Under current conditions, there is no public access to the coast at the Mill Site. Public access to the coast is available at MacKerricher State Park (Glass Beach) immediately north of the Mill Site and at Ocean Front Park immediately south of the site.

XV. Transportation/Traffic

Would the project result in:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
a. Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?			X	
b. Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?				X
c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?				X

d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				X
e. Result in inadequate emergency access?				X
f. Result in inadequate parking capacity?				X
g. Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?				X

The proposed project would result in a temporary increase in truck traffic to and from the Mill Site as demolition materials are removed from the site. Trucks would enter and exit the site via the Cypress Street Gate. Trucks would enter onto Main Street (State Route 1) at the signalized intersection of Main Street and Cypress Street. The impacts would be temporary and short-term and are not considered significant. An anticipated 350 truckloads of material will be removed from the site over the course of a three month period. This would result in roughly eight to 15 truck trips per day into and out of the site.

XVI. Utilities and Service Systems

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?				X
b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?				X
c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?				X
d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?				X
e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?				X
f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?				X
g. Comply with federal, state, and local statutes and regulations related to solid waste?				X

The project does not involve any modifications to utilities or public service systems. The City's demolition and recycling ordinance requires that 15% of the non-concrete and 75% of the concrete debris be recycled. The applicant will comply with the ordinance.

XVII. Mandatory Findings of Significance

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?		X		
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?				X
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?				X

Mitigation measures have been incorporated into the project to prevent any significant impacts to environmental resources and cultural resources. There are no cumulative impacts associated with the demolition of seven structures on the property. Mitigation measures have been incorporated into the project to ensure that there will be no adverse effects on human beings.

ATTACHMENTS

1. Site Location
2. Site Map

OTHER DOCUMENTS AVAILABLE FOR REVIEW AT FORT BRAGG COMMUNITY DEVELOPMENT DEPARTMENT:

(1) Appendix A: Asbestos Abatement Technical Specifications, Amec, February, 2013
(2) Appendix B Hazardous and Regulated Materials Technical Specifications, Amec, February, 2013
(3) Delineation of Potential Section 404 Jurisdictional Wetlands and Waters, WRA, September 2009

Attachment 1: Site Location