

**A DIVERSION STRATEGIES  
PRODUCT**



**CENTRAL COAST  
TRANSFER STATION  
PROJECT REVIEW AND  
RECOMMENDATIONS**

MAY 2020

**PREPARED BY**  
Diversion Strategies



**FOR**  
City of Fort Bragg



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# Introduction

For over 15 years, Mendocino County and the City of Fort Bragg have been seeking a waste transfer solution for waste generated in the Mendocino coastal region. In an attempt to consolidate a bifurcated transfer operation for collected material and self haul material, the City and County developed a Central Coast Transfer Station that would be optimally located for transport of coastal waste to destination facilities in other areas of Northern California. A location was determined, and environmental review of a project was completed. Over the last several years, the project slowed down due to several factors. In 2019, the City of Fort Bragg released a Request for Proposal to evaluate the viability of the Central Coast Transfer Station in light of the current market and climate in California. Diversion Strategies was hired to perform this evaluation.

Diversion Strategies is a small, women-owned consulting business based in Sacramento, California. Focusing on the development of solid waste, recycling and organics infrastructure starting from the regulatory level, to market assessment, facility planning and permitting, project management, to operations, the Diversion Strategies team brings unique experience, insight and perspective to their clients.

Erin Merrill and Rachel Oster are the two principals that make up Diversion Strategies. Between the two, they have over 25 combined years of experience in the solid waste and recycling industry. The Diversion Strategies team has extensive regulatory, planning, permitting and development experience for solid waste facilities throughout the west coast. Diversion Strategies' two principals have designed, permitted, developed and operated all types of waste and recycling facilities including: MRF's, transfer stations, landfills, compost facilities, anaerobic digestion, chip and grinds and hauling facilities. Additionally, the team brings experience in the operations and oversight of solid waste facilities including the oversight of two large commercial compost facilities, a landfill, and three hauling companies.

## Methodology

Diversion Strategies initiated this project by working with City staff to compile a list of key stakeholders with past and present knowledge of the project to interview. Each interview was documented and summarized upon completion, and can be found in Appendix A.

Concurrently, Diversion Strategies undertook a review of the historical documents and the written record for the conception and development of the Central Coast Transfer Station Project to get a better understanding of the understandings and history of the project.

Following the interviews and written record review, Diversion Strategies summarized the history of the project, and identified gaps and challenges to the project in its current state, which can be

found in the report under “Gaps and Challenges to Developing the Central Coast Transfer Station Today”.

After a thorough review of the record and interviews with stakeholders, Diversion Strategies assessed the project feasibility in light of the interviews, written records, project gap and challenges assessment, and regulatory climate.

To ensure a thorough review of all options for the City of Fort Bragg and Mendocino County, Diversion Strategies reviewed other alternatives including using the Caspar Transfer Station, developing a transfer station at the Highway 20 site, and exploring other creative options.

In addition, to evaluate the economics of developing a present day, compliant transfer station, Diversion Strategies developed a “Present Day Transfer Station Pro Forma” that makes educated assumptions about capital costs, operating expenses, and potential commodity revenue. The intent of the pro forma was also to determine what the appropriate tip fee would be in order to recover the costs of development over a long term, 20 year timeframe. This pro forma is designed in such a way that costs can be easily plugged in by the City and County as costs that are assumed become known.

Based on the above interviews with stakeholders, pro forma development, a thorough review of the public record as well as assessing the project needs for each option, Diversion Strategies developed an analysis of several options, ultimately providing a recommendation for the City and County on a transfer station solution for the Mendocino coastal region.

# Project Background



*Photo 1: Regional Map*

The Central Coast Transfer Station (“CCTS”) project originated in the 2000’s to provide for an efficient, optimally located, cost effective consolidation of transfer activities for the Fort Bragg and Mendocino coast communities (“Coastal Region”). At that time, and continuing today, solid waste activities in the Coastal Region are bifurcated between two facilities and transported “over the hill” to Willits. In Willits, material is re-loaded at the Willits Transfer Station (owned by Solid Waste of Willits) and transported to additional solid waste facilities for processing, composting or disposal. One of these facilities in the Coastal Region is an outdoor transfer operation at the closed Caspar landfill (the Caspar Transfer Station), and the other is the operation at Fort Bragg Disposal/Waste Management’s facility north of downtown Fort Bragg on Pudding Creek Road.

Initiated following the last waste hauler bid process, City and County government officials recognized the need for a new transfer station for the next bid cycle. The current system was determined to be inefficient, resulting in unnecessary truck trips, double handling of wastes and excessive release of greenhouse gasses. A consolidated transfer station would receive both self haul and commercially collected materials at one location, optimally located, for direct transport to a destination landfill. As a response, in 2006 the City and the County commissioned a consultant to prepare a siting study for a Central Coast Transfer Station.

The siting study was initiated with the evaluation of 25 potential sites. From 2007 to 2011, the evaluation was reduced to 5 sites located along Highway 20 including the proposed location on the north side of Highway 20 (“Highway 20”). Other locations evaluated in this phase included another site on the south side of Highway 20, the MCRPD park site, Leisure Time RV Park, the

Georgia Pacific Wood Waste site and the Caspar transfer operation. These sites would later be evaluated either as alternatives in the Environmental Impact Report (“EIR”), or considered but disregarded.

In 2013, the Highway 20 site was chosen as the preferred site for the Central Coast Transfer Station. Negotiations commenced to coordinate a land swap, and an EIR was prepared for the project.

## Highway 20

The Highway 20 location for the CCTS is located just east of the City of Fort Bragg, on the north side of the highway. The Highway 20 site was chosen due to its location along the highway, the low cost of land acquisition for public ownership, and its separation from other land uses. 13 residents are located within 1000 feet of the project area.

The location involves land owned by the California Department of Forestry (“Forestry”) as part of the Jackson Demonstration State Forest. Development of the CCTS at the Highway 20 site involved a three way land swap involving the City/County and two state agencies, Forestry and the California Department of Parks and Recreation (“State Parks”). The City/County would take ownership of a 17 acre portion of the Jackson Demonstration State Forest (“JDSF”). State Parks would then transfer 12.6 acres from the Russian Gulch State Park (“RGSP”) to Forestry to compensate for the 17 acre portion JDSF transferred to the City/County. State Parks would then receive a 60 acre conservation easement from the City/County over the Caspar disposal site and adjacent area from the City/County. Legislation was required to authorize the land exchange. In 2011, Wes Chesbro sponsored legislation for AB 384.



*Photo 2: Parcel map for CCTS property. The CCTS is located on the portion north of Highway 20.*



*Photo 3: Project boundary for CCTS*

The proposed concept for the CCTS was a state of the art transfer station. It would provide a central and convenient location for both commercially collected and self-haul wastes. The facility would be located on an approximately 5-acre footprint, with the potential to expand to 10 acres in the future. The 30,000 square foot CCTS was sized to accept up to 100 tons per day, a peak tonnage of up to 200 tons per day due to surges or emergencies, and have 3 days of storage capacity in the event the roads were closed. The transfer station would be fully enclosed with a negative air pressure ventilation system to a biofilter, and use of roll-up doors and/or driveway curtains. This would help to mitigate potential impacts due to noise, odor, and dust.

The location along Highway 20, just east of the City, provided convenient access for customers accessing the site as well as transfer trailers leaving the site to head east to landfill, compost, or facilities for further processing. The proposed conceptual design included construction on Highway 20 to provide acceleration and deceleration lanes and a turn pocket at the entrance of the facility.

Initial estimates for the construction of the conceptual transfer station design were between \$4M and \$5M in 2016, including costs for permitting, environmental review, design and engineering, construction and equipment. This estimate did not include costs for land acquisition.



The intention for the CCTS was that a private company would contract to design, build, and operate (“DBO”) the transfer station. The operator would then recover the cost of the build through the long term contract.

In 2014, work on the Environmental Impact Report commenced on the Highway 20 location. The EIR evaluated the environmental impacts of the proposed project, evaluating potential impacts to air, traffic, biology, land use and other topics as prescribed in California code. The EIR found that any environmental impacts resulting from the project could be mitigated to a less than significant level with specific mitigation measures laid out in the EIR. The EIR was finalized and certified by the City and County in 2016.

Shortly after the EIR was certified, State Parks backed out of the land swap deal. Around the same time, the contact for the county retired and the position went through some turnover. Since then, the CCTS project has been unofficially on hold.

Since State Parks backed out of the land swap deal, some supervisors and stakeholders have investigated the possibility of an alternate swap. This has involved reaching out to various timber companies in the region periodically. To date, the contacted timber companies have indicated they are not interested.

## Caspar Transfer Station

The Caspar Transfer Station (“Caspar”) is an outdoor transfer operation located adjacent to the closed Caspar landfill. After the landfill closed in 1992, the 3 acre transfer operation started operations to consolidate and transfer self haul wastes, including municipal solid waste, white goods, and organics. The transfer station is owned by Mendocino County. It has been operated under contract with Solid Waste of Willits (“SWW”) since 2012.



*Photo 4: Caspar Transfer Station*

The Caspar facility currently manages self hauled waste for transfer, accommodating. Waste Management provides 2 trucks per day to consolidate the waste and haul it to the Willits Transfer Station. Organics are hauled to Cold Creek Compost, a food and green waste composting facility located in Potter Valley.

Jerry Ward of SWW has evaluated the ongoing use of Caspar as a transfer station. To upgrade and make the transfer station more efficient, Mr. Ward has suggested the following:

1. Increase the ramp area to be able to dump directly into a possum belly trailer
2. Relocate recycling bins to the roofed area, then load out into walking floor trailers for better payload to the Willits Transfer Station

### 3. Construct a structure over the organics area

Caspar is located approximately 9 miles south of Fort Bragg. It's location has raised concerns for the double backing of vehicle miles, where the consolidated waste is "backtracked" to head back into Fort Bragg then onto eastbound Highway 20. Additionally, access to the Caspar site from Highway 1 onto County Road 409 has been a concern. Specifically, the proximity of a bridge on Highway 1 just north of the turnoff to County Road 409 has raised concerns for traffic making a left turn onto County Road 409. The proximity of the bridge on Highway 1 makes it challenging and expensive, if even feasible, to expand the highway in that area to accommodate additional road infrastructure such as a turn lane and an acceleration/deceleration lane.

Three residences are within 1000 feet of the transfer station. The residents have formed an organized neighborhood group and have been active during the CCTS development process. Following the closure of the landfill, the residents had been told by the county that the transfer station operation was temporary. This group has expressed concern about traffic, access to the transfer station and nuisance conditions such as odor and litter.

The EIR for the Highway 20 location evaluated Caspar as an alternative, and deemed it inferior due to concerns on aesthetics ,energy use, greenhouse gas and transportation safety.



*Photo 5: Entrance to Caspar and the Existing Roofed Structure*



*Photo 6: Current Z-wall for Load-out into Debris Boxes*



*Photo 7: Organics Area at Caspar*

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## Fort Bragg Disposal/Waste Management Pudding Creek Facility

Just north of downtown Fort Bragg, Fort Bragg Disposal/Waste Management (“Fort Bragg Disposal”) owns and operates a transfer station, truck maintenance facility, hauling yard and recycling buy back facility (“Pudding Creek”). This facility has been in operation since 1992. The 9 acre facility is located on Pudding Creek Road, adjacent to the cemetery.



*Photo 8: Pudding Creek Facility*

In 2015, Fort Bragg Disposal changed its transfer infrastructure from using “pods” to a more efficient transfer trailer operation. Concurrent with this change, Fort Bragg Disposal revised its use permit and solid waste facility permit to update their on-site activities, including waste transfer.

At the Pudding Creek facility, Fort Bragg Disposal operates a recycling buy back, where the public drops off recyclables in dedicated recycling stream areas. Fort Bragg Disposal then consolidates the recyclables and transports them to the Willits Transfer Station.

In addition to the buy-back, Fort Bragg Disposal also operates a municipal solid waste transfer operation. Material collected by Fort Bragg Disposal on its routes in Fort Bragg and the unincorporated Mendocino county area are collected in smaller collection trucks, brought to the Pudding Creek site where it is consolidated and loaded into larger top-load walking floor transfer trailers. The transfer trailers haul the material to Willits. Fort Bragg Disposal operates a fleet of transfer trucks, which transports 1-2 loads per day. The Pudding Creek facility also receives and transfers organic wastes at the facility. The organics are hauled to Cold Creek Compost.

The Pudding Creek facility also includes areas for bin storage, truck parking and a truck maintenance facility.

The facility is adjacent to over 60 residences. A mobile home park is located just north of the site, residences are located to the east and a hotel is located down Pudding Creek Road to the west at the intersection of Highway 1 and Pudding Creek Road. This intersection is controlled by a stop sign for Pudding Creek Road, with through traffic on Highway 1. Access to the facility from Fort Bragg and the south would require traffic to travel along Main Street in Fort Bragg.

Pudding Creek was evaluated in the EIR as an alternative. Issues identified in the EIR for Pudding Creek was traffic congestion on Main Street through Fort Bragg, the site's proximity to residences and that it was not available for public ownership.



*Photo 9: Entrance into the Pudding Creek Facility*



*Photo 10: Bin and Truck Storage, looking to Northwest Corner of Facility*



*Photo 11: Part of the Loadout and Organics Area, Looking to Northeast Corner*





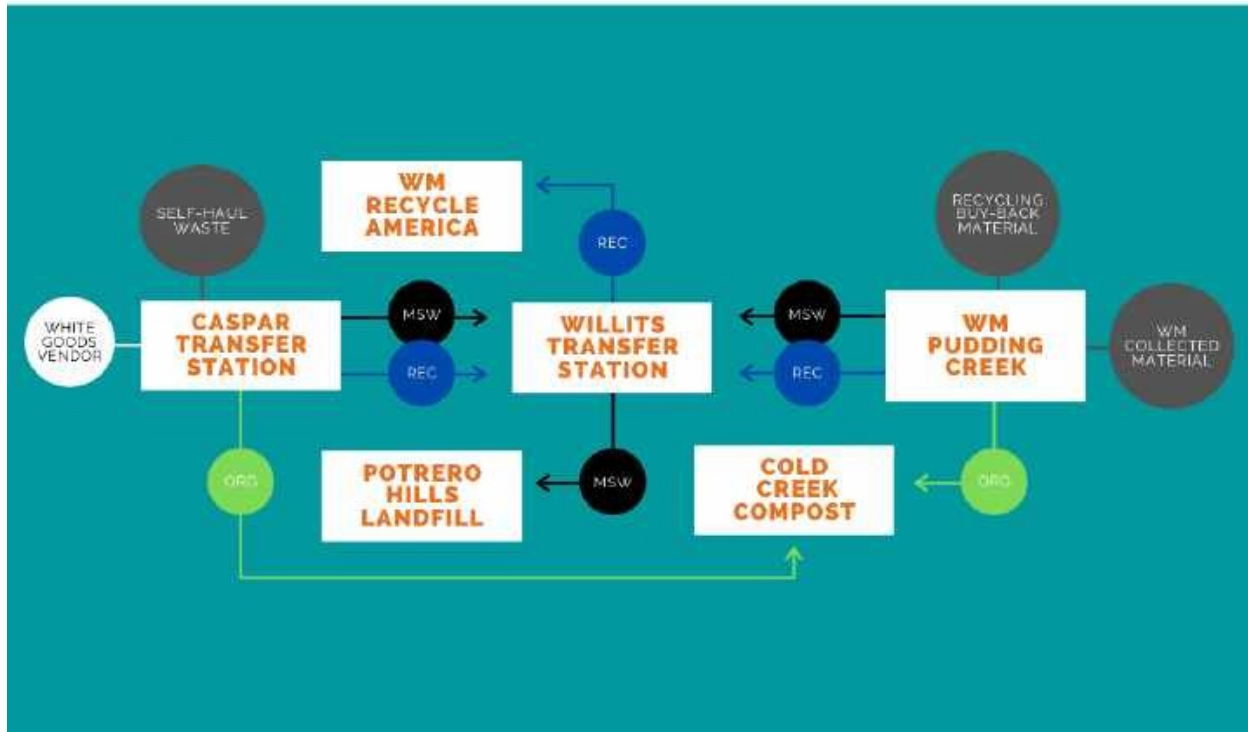
*Photo 12: Truck and Maintenance Shop, East Side of Facility*



*Photo 13: Office and Queueing Area for Buy Back*

# Waste Flow in the Coastal Region

## MENDOCINO COASTAL REGION WASTE FLOW



Collection service in the Mendocino Coastal Region, consisting of both the City of Fort Bragg and unincorporated Mendocino County is not a mandatory service. Collection of waste and recyclables is achieved by a combination of both franchise haulers and self haul.

Two hauling companies operate in the Mendocino Coastal Region, Fort Bragg Disposal/Waste Management and SWW. A third company, C&S, is based in Ukiah. C&S does not operate in the Coastal Region at this time, but operates hauling operations and a transfer station in Mendocino County.

Fort Bragg Disposal operates as a collection company as well as owns and operates the Pudding Creek facility. They have operated out of the Pudding Creek facility since 1992. As described previously, Fort Bragg Disposal collects material from both the City of Fort Bragg and unincorporated Mendocino County. Collected material is taken to Pudding Creek, where it is consolidated and loaded into transfer trailers for transport to Willits. Recyclables that are received at the buy back at Pudding Creek are also transported to Willits. Organics collected by Fort Bragg Disposal are transferred to Cold Creek Compost in Potter Valley. Fort Bragg Disposal also loads and transports recyclable materials out of Caspar to go to Willits.

SWW has been operating as a hauling operation in Fort Bragg since 2000. Materials collected by SWW are taken to Willits. SWW has also operated the Caspar Transfer Station since 2011. Municipal solid waste is unloaded by self haul customers into debris boxes that are located under a roofed structure, which are transported by SWW to Willits. As organics accumulate at Caspar, SWW transfers them to Cold Creek Compost.

From Willits, municipal solid waste is transported by SWW to Potrero Hills Landfill in Solano County. "Blue bin" recyclables are transferred from the Willits Transfer Station to Waste Management's Recycle America facilities in Sacramento and San Jose.

Daily tonnage of waste in the Coastal Region is approximately 35-50 tons per day.

In a 2015 memorandum from Mike Sweeney, traffic volumes were estimated as follows:

- Self haul cars and trucks: 82 vehicles/day
- Franchise hauler collection trucks: 63 trips/week
- Transfer trailer outhaul (top load transfer trailers): 40 trips/month
- Recyclables/organics outhaul: 5 trips/week

## Current Status

Since the EIR was certified in 2016, several changes have occurred which affected the development of the CCTS project.

Most notable was the collapse of the land swap between the City/County, Forestry and State Parks. As discussed in this report, some stakeholders have investigated agencies interest in revisiting the land swap, or alternates to the land swap by contacting various timber companies in the region as to their interest in participating in a land swap. Despite this intermittent outreach by stakeholders, the land status has ultimately remained the same.

Other changes since the EIR has included:

- The change in use of the “pod” system for collection and transfer for waste materials collected by Fort Bragg Disposal. The change from the pods has resulted in more efficiency in collection payload, resulting in a reduction in truck traffic. The switch from the pod system also resulted in some changes to Fort Bragg Disposal’s Pudding Creek facility.
- Staff changes and turnover at the City/County level. The main project manager for Mendocino County retired. Since his retirement, additional staff turnover has occurred with several periods of vacancy. With the turnover, and other priorities by the City and the County, the CCTS project has slowed, if not stalled.
- The City and the County are both looking towards the preparation for another Request for Proposal in their jurisdictions for waste collection services in the near future.
- During the development of the CCTS, one of the project objectives was public ownership of the transfer station. Stakeholder feedback has indicated that public ownership may not be as much of an objective for a transfer station project that would serve the Coastal Region.

## Key Regulations and their Impact on the Project

From the time the original Highway 20 Transfer Station Project was considered to the present day, many regulations that influence the design and management of solid waste facilities across California have been adopted and are now enforceable under law. In addition, the waste and recycling industry’s tradeable commodity markets have become volatile due to international trade policies like China National Sword, and seemingly unending variation in the commodities supply chain thanks to social phenomena such as “the Amazon effect.”

## 1. AB 32

California's Global Warming Solutions Act of 2006, better known as AB32, outlines the state's initiative to reduce climate change or GHG emissions. AB32, which was signed into law in 2006, aims to cut GHG emissions to 1990 levels by 2020 and below 1990 levels by 2050. This law set the groundwork for every piece of recycling policy that came after it.

*Impact on the project:* No direct impact, except for the promulgation of subsequent laws focused on increased recycling efforts to reduce GHG emissions.

## 2. AB 341

Assembly Bill 341 (AB-341) is designed to help meet California's recycling goal of 75% by the year 2020. AB-341 requires all commercial businesses and public entities that generate 4 cubic yards or more of waste per week to have a recycling program in place. In addition, multi-family apartments with five or more units are also required to form a recycling program.

*Impact on the project:* AB 341 mainly impacts collection programs, but it does impact the amount of volume of recyclables managed by the transfer station.

## 3. AB 1826

As part of California's recycling and greenhouse gas (GHG) emission goals, businesses are now required to collect yard trimmings, food scraps and food-soiled paper for composting, effective April 1, 2016. Multifamily buildings with five or more units are now required to collect yard trimmings, effective April 1, 2016.

*Impact on the project:* AB 1826 requires commercial businesses to sign up for organic waste collection, and requires the collection company to provide that service. This regulation has a more significant impact on the project because introducing food waste to green waste adds an additional regulatory burden on any operator managing a commingled waste stream.

Diversion Strategies observed that at the Pudding Creek facility, green waste was being stockpiled for what appeared to be several months awaiting capacity at Cold Creek Compost after Cold Creek had temporarily shut down. Once food waste is introduced into this stream, this material will have to be managed in an entirely different way. Commingled food and green waste can not be stockpiled for more than 48 hours, and it must be stored under a covered building.

This regulation will impact both the capital and operational costs of a present day and compliant transfer station. The additional capital and operational costs have been reflected in the pro forma developed by Diversion Strategies (Appendix B).

## 4. AB 901

Governor Brown signed AB 901 (Gordon, Chapter 746, Statutes of 2015) into law to change how organics, recyclable material, and solid waste are reported to CalRecycle. The Recycling and Disposal Facility Reporting System (RDRS) law requires businesses to report directly to CalRecycle on a quarterly basis on types, quantities, and destinations of materials that are disposed of, sold, or transferred inside or outside of the state.

*Impact on the project:* AB 901 impacts today's transfer stations as an operating expense. Many present day transfer stations are already collecting this data with their systems in place, but the additional requirements of reporting often require at least 50 percent of an employee's time. The financial impact of this regulation is reflected in the Pro Forma (Appendix B).

## 5. SB 1383

SB 1383 establishes targets to achieve a 50 percent reduction in the level of the statewide disposal of organic waste from the 2014 level by 2020 and a 75 percent reduction by 2025. The law provides CalRecycle the regulatory authority required to achieve the organic waste disposal reduction targets and establishes an additional target that not less than 20 percent of edible food that is currently disposed of is recovered for human consumption by 2025.

*Impact on the project:* The economic impact of SB 1383 on transfer stations is very similar to what is described above for AB 1826.

SB 1383 does allow for a "rural exemption," however Mendocino County does not fall within this exemption. Counties that qualify as a rural county may apply for an exemption. This type of exemption is common in California solid waste regulations due to the unusually high cost of providing service to generators in these areas. For a county to be considered a rural jurisdiction, it must have a population of less than 70,000 people. Based on 2010 U.S. Census data, 19 counties qualify for this exemption.

An additional impact of SB 1383 will be the need to update and amend collection contracts across the state. Since there are so many new requirements as a part of SB 1383 on a region's waste collection programs and infrastructure, jurisdictions must make sweeping changes to the way waste is collected in their region of authority. This can be an opportunity for jurisdictions to require compliant programs and facilities from their local waste collection provider.

## 6. National Sword

In its simplest form, the Chinese National Sword is the country's latest and strictest regulation on imports of solid wastes as raw materials. The policy bans various plastic, paper and solid waste, including plastics such as PET, PE, PVC and PS. This means that China will not accept shipments that are mixed with trash, the wrong type of recyclable, or low-quality recyclables like greasy paper goods. The policy was announced in July 2017, and the ban officially began

January 1, 2018. In addition to the bans, China is reducing the number of import licenses, meaning that fewer businesses will be able to import waste.

*Impact on the project:* China's import policies have had a tremendous impact on the industry since the Central Coast Transfer Station was originally imagined. National Sword has contributed substantially to a 50 percent reduction in the revenues received from the sale of recyclables recovered through curbside recycling. In addition, it has resulted in increased processing costs and residue rates at material recovery facilities. Diversion Strategies has reflected this economic reality in the attached Pro Forma (Appendix B).

## 7. Stormwater

As of July 1, 2015, California has implemented a new Industrial Storm Water permit (2014 Permit) with more stringent requirements that cover a much broader range of manufacturing and industry. As of July 1, 2015, a Discharger shall comply with the new requirements to meet provisions of Division 7 of the California Water Code (commencing with section 13000) and provisions of the federal Clean Water Act. The U.S. EPA established application requirements for stormwater permits for specified categories of industry, including requirements for Dischargers to comply with technology-based effluent limitations, and any more stringent water quality-based limitations necessary to meet water quality standards. To ensure compliance with water quality standards, NPDES permits may also require a Discharger to implement best management practices (BMPs) to control or abate the discharge of pollutants when numeric effluent limitations (NELs) are infeasible.

*Impact on the project:* This rule drastically changed the stormwater management approach at all solid waste facilities, material recovery facilities (MRFs), recycling centers, and hauling stations. There is strict liability for exceedances, as well as discharges. Compliance with this permit is tied to a three-tiered Risk Level system. As the risk level increases, due to recurring exceedances, there will be additional elements required in SWPPPs, enhanced observations and inspections, formal Monitoring Implementation Plans, additional wet weather sampling, obtaining daily average or qualified combined samples, exceedances and corrective actions, and implementing treatment control BMPs.

This zero discharge requirement may have the single biggest impact on capital cost at a present day Transfer Station. A compliant facility will also have increased operations cost in the form of labor for the increased testing and reporting required. These costs are reflected in the Pro Forma (Appendix B).

## Gaps & Challenges to Developing Central Coast Transfer Station Today

The CCTS as proposed and evaluated in the EIR features a publicly owned, comprehensive transfer station design, operated by a private operator who will develop and fund the transfer

construction and operation with reimbursement generated from tip rates. Since the certification of the EIR in 2016 and State Parks decision to pull out of the land swap, momentum on the development of the CCTS has slowed.

Several challenges and gaps exist should the development of the CCTS as proposed move forward.

## 1. Location

The Mendocino coast and Fort Bragg are located in an isolated area. Given this isolation, it could be difficult to attract solid waste companies to provide competitive bids for just a transfer station DBO contract. Additionally, the low tonnage coming through the transfer station may not be enough to offset the investment for a private company towards the DBO for the CCTS. With population growth remaining steady in the area, waste generation is unlikely to substantially increase over a contract term. Although the need for transload in Willits would be removed with the construction of the CCTS, transportation is still an issue given the distance and haul required to send material to its post-collection facilities such as composting, recyclables processing and landfill.

It could be expected that the costs in a bid for a DBO would require a high rate, likely higher than the current rate, to offset some of these challenges. Combining the DBO with a collection contract may be more attractive to bidders, since the construction costs could be amortized over the length of the collection contract. However, it should be noted that the cost and rate is still a concern based on the location of the region.

## 2. Land Availability

The proposed location of the CCTS is on land currently owned by the California Department of Forestry. One of the attractants for the Highway 20 site was that it could be obtained by the City/County for low or no cost for use as a solid waste transfer station. The availability of the land for the transfer station was reliant on a three-way land swap between the City/County, Department of Forestry, and State Parks. Shortly after the certification of the project EIR, State Parks pulled out of the arrangements for the land swap.

Since then, not much has been done on behalf of the City/County with Forestry and State Parks to resurrect or find an alternative to the land swap with those agencies. According to stakeholders during our interviews, personnel changes have occurred at those agencies, and at this point in time, neither agency has shown much interest in revisiting a land swap.

The possibility of coordinating a land swap with various timber companies in the region has also been brought up as a way to acquire property for public ownership of a transfer station but with low or no acquisition costs. According to stakeholders interviewed, several timber companies have been approached by various people to gauge interest in a land swap. To date, these



timber companies have expressed a reluctance or lack of interest in investigating a land swap with the City/County for a transfer station location.

Coordinating a swap with a public agency or private entity would be a challenge. It is not considered impossible, as confirmed by several stakeholders who were interviewed. However, pursuing the possibility of a land swap would require persistence and a dedicated effort to “run it to ground”.

### 3. Ownership

One of the objectives of the CCTS project has been public ownership of the transfer station, with a private contractor designing, building, and operating the transfer station under a long term contract. The contractor would recoup their expenses through the rate during the life of the long term contract. The desire for public ownership of the transfer station was that at the end of the contract, the City/County would be the owner and not be at the mercy of one company owning the transfer station assets.

While that is one model for the development of a transfer station in a jurisdiction, it does come with some challenges. First, as discussed above, the location of the Coastal Region, distance to solid waste infrastructure such as landfill, and the low tonnage being generated in the region could make attracting companies to bid on the DBO contract difficult. Second, if the City/County were the owner of the transfer station, then at the end of the long term contract, the City/County would-be owner of aged infrastructure at the end of the contract. This may require replacing aged equipment, repairs to the onsite structures and controls, upgrades to the facility to come up to speed on regulation and technology, and any modifications or expansions needed for efficient transfer station operation. Repairs, upgrades, modifications and/or expansions require financial investment, design, and permitting to accomplish. This may make the transfer station asset more of a liability for the City/County as well as impact the potential for bids for the next bid cycle for transfer station operation. This may also impact rates due to expenses from the aging infrastructure.

It is not an unusual model for the company with the collection contract to also develop their own solution for transfer operations, including constructing transfer assets such as a transfer station. Examples of jurisdictions in the state where the collection company also has transfer station operations include Oakland, San Francisco, Placer County, Marysville, and Sacramento.

Including a transfer operation with the hauling collection contract allows the bidding company to offset some of the cost of the transfer station development and operation with revenues from the hauling operation. This could be of benefit to the rates and ratepayers. The City/County could still define parameters for the transfer operation so that certain objectives are still met (for example, waste receiving hours to limit traffic impact on specified roadways at certain times, litter pick up programs, etc.), and have that reflected in the bid for a combined collection and transfer operation.

Based on discussions with stakeholders, it appears that the objective for public ownership of the transfer station may not be as much of a priority for the City/County.

## 4. Permitting

At the time that State Parks decided not to continue with the land swap, the CCTS had a certified final EIR. To date, the project has not obtained any permits for construction or operation of the transfer station project. It can still be considered that the project is still in the early stages of permitting and development.

Permits for the construction and operation of the transfer station would need to be obtained from multiple agencies. These include:

- Major Use Permit from Mendocino County
- Solid Waste Facilities Permit from Mendocino County Environmental Health, with concurrence from CalRecycle
- Encroachment Permit from California Department of Transportation
- Stormwater discharge permit or coverage under the General Industrial permit for stormwater activities
- Coastal Zone Development Permit from the California Coastal Commission
- Timberland Conversion Permit from California Department of Forestry
- Variance for setback from California Department of Forestry
- Authority to Construct/Permit to Operate from Mendocino County Air Quality Management District
- Well construction permit from Mendocino County Health Department
- Septic system permit from Mendocino County Health Department
- Construction, grading and electrical permits from Mendocino County Building Department
- In the event that threatened or endangered plant and animal species, permits and approvals may be required from California Department of Fish & Wildlife and/or U.S. Fish & Wildlife Service

Timeframes to obtain these permits range from several months (for example, the Solid Waste Facility Permit) up to several years (for example, the Encroachment Permit or biological permitting).

The CCTS does have a complete and final EIR for the project, which is still valid for the specific location and conceptual design. Any updates to the design or any information that is known now but may not have been at the time of the original EIR that may have an environmental impact may necessitate having to do a Supplemental, Subsequent, or an addendum to the existing EIR. Updated information may include new or updated biological information at the project site or updated traffic conditions/traffic impact analysis in and around the project area. Given that the data reviewed in the existing EIR was compiled in 2013-2014, it would be likely

that a re-review of the project in light of any potential changes to biology, air, and traffic, as well as an updated regulatory climate, would necessitate some sort of update to the EIR.

No fatal flaws are identified in obtaining these permits at this time, however, it would involve time to obtain the permits and resources such as staff, technical experts/consultants and possibly legal counsel. Costs would be associated with updating the EIR, technical reports for air, traffic and biology, and filing fees for the permit applications.

## CCTS Project Feasibility Today

The biggest factor for the feasibility of the CCTS as proposed is land acquisition. Until the land can be secured, either through land swap, purchase or lease, the project will not be feasible. Assuming land can be secured, the project becomes more feasible.

Assuming that the Highway 20 location can be secured, the project feasibility is reliant on several factors: permitting, design and cost, political climate, and a successful DBO bid.

### 1. Permitting

Based on the information presented, and the conceptual design, no fatal flaws have been identified that determine that the CCTS project at the Highway 20 location would not receive the operational and construction permits to be built and operated. One of the longest lead items for a project is the EIR process, which has been completed for the Highway 20 location. An update to the EIR would take some time, but can be anticipated to be a quicker process since it would be focused on any subjects where changes have occurred since the original EIR.

As discussed previously in this report, the CCTS project will require several additional permits for operations and construction, which would take between several months up to years to complete. Again, based on the information presented, no fatal flaws have been identified that would make permitting infeasible.

It is important to note that the EIR used a comprehensive transfer station design, but the DBO contract would include finalizing the design as part of that bid. It would be advisable to obtain permits after that final design has been determined, which would add time to the development of the CCTS project.

If the CCTS were to move to a different location from the Highway 20 site, the permitting feasibility would need to be determined specific to that location. Factors such as traffic impacts, biological impacts, design and layout, utilities and aesthetics could impact the permitting feasibility and development timeline. A new California Environmental Quality Act (“CEQA”) evaluation would be required, whether that is an Exemption, Negative Declaration or EIR, based on that specific project description and location. While some of the existing EIR might be usable in the drafting of a new CEQA document, a new location would require its own evaluation.

## 2. Design and Cost

The conceptual design for the CCTS is a comprehensive design involving a fully enclosed transfer station, negative air ventilation to a biofilter, stormwater detention infrastructure and an onsite circulation pattern to facilitate traffic flow through the facility. Roadway improvements are also proposed for Highway 20 that consists of an acceleration and deceleration lane, and left turn pocket into the facility. The facility footprint is approximately 4 acres, with an additional 1 acre buffer. The project would manage 35-50 tons per day with added capacity for emergencies.

The conceptual design is feasible and typical for a transfer station. However, it does come with expense for the construction of the facility. In 2016, the estimated cost of developing the CCTS was \$4-5 million. Please note that the present day transfer station pro forma (Appendix B) includes hard and soft development costs, but does not take into consideration road improvements. The road improvement costs would be in addition to the other capital costs reflected in the attached pro forma.

It may be worthwhile to re-evaluate the design to evaluate effective design and cost savings. Factors such as the low daily tonnage and the daily transfer out of waste, combined with operational and housekeeping practices and alternative mitigations such as berms, walls and landscaping could be used to mitigate offsite impacts of odors, noise and dust for a partially enclosed transfer operation. It is possible that the footprint of the facility may shrink, reducing the amount of paving, stormwater and stormwater infrastructure that the design would have to consider.

Some features, such as the Highway 20 roadway improvements are a costly part of the design and construction costs, and will be an expense for the development of the site at this location regardless.

The present day transfer station pro forma (Appendix B) estimates that the facility would have to be at an average tip rate/ton of \$107.60 with an average projected cash flow of \$171,029.00.

## 3. Political Climate

A solid waste facility resulting in an efficient management of solid waste material, efficient operation and a reduction in impacts such as traffic and air impacts are consistent with State goals. See the section in this report on key regulations.

Locally, the Highway 20 location has been supported by the local City/County governments. This was confirmed by the approval and certification of the EIR in 2016. With the exception of some opponents who commented on the EIR, it appears the Highway 20 location has been generally supported.

Since the certification of the EIR, the makeup of the Board of Supervisors and the City Council has mostly changed. The CCTS project had some momentum with the previous leadership. With the new leadership, priorities have shifted.

## 4. DBO Contract

The feasibility of the CCTS is dependent on a successful bid for the DBO contract by a private company. The successful contractor would fund the design, build and operation of the transfer station as part of a long-term agreement of 15-25 years. The private company would then recoup their expenses through the rate over the term of the contract.

As discussed previously in this report, the location of the Coastal Region, the low tonnage and the transfer station DBO as a standalone contract does provide an obstacle to attracting companies to bid. The capital investment in developing this comprehensive, sophisticated transfer station design may also be an obstacle for a company to bid or result in a high bid that significantly increases rates.

This could be offset by combining a transfer station element into the upcoming collection and hauling bids. By combining the collection and hauling with the transfer operation, companies could consolidate cost as well as use existing infrastructure to reduce cost. Transfer operations in a combined bid could include the CCTS, a modified design to the CCTS or consider other locations.

# Transfer Station Options & Alternatives

## 1. Continued Use of Caspar

One of the options the City can consider for the transfer of municipal solid waste and recyclables is the continued operation and expansion of Caspar Transfer Station, which is owned by Mendocino County and is currently being operated under contract by SWW.

According to Jerry Ward of SWW, the current operating contract between Mendocino County and Solid Waste of Willits (SWW) was supposed to end in 2017 with the understanding that all material would be going to the newly built Central Coast Transfer Station. However, due to the delay in building the CCTS, this contract was extended to 2022. Over the life of the contract, SWW has collected a County designated fee of \$3.00/yd<sup>3</sup>, resulting in over \$600,000.00 collected to date, according to SWW. As Diversion Strategies understands it, the intention was that this money would go into the development and operation of the CCTS.

Diversion Strategies has reviewed the option of expanding the current operation at the Caspar Transfer Station to collect, process and transfer the MSW and recyclables for the City of Fort Bragg. Our findings are listed below, followed by a recommendation based on project feasibility, which can be found in the recommendations section of this report.

## Location and Traffic

The Caspar Transfer Station is located at 14000 Prairie Way off of County Road 409, about 1.25 miles off of Highway 1 and just south of Fort Bragg in Caspar, California. As noted above, the land is owned by the Mendocino County Department of Transportation. The facility is located at a closed landfill. The area is a rural residential area with no known complaint history with neighbors, but an organized opposition group to the operation of a transfer station at this location.

It was brought to Diversion Strategies' attention throughout the course of the research phase of the project that the Caspar facility is not in an ideal location for an industrial facility that would be serviced by tractor-trailers. This is mainly due to the inability to construct a turn pocket appropriate and necessary for tractor-trailers to turn onto County Road 409 from Highway 1 and vice versa.



*Photo 14: Caspar Creek Bridge as part of Highway 1, looking at the intersection with County Road 409*

In addition to the traffic concerns, the concern was also raised that Caspar is located outside of the City of Fort Bragg in a remote location which is not ideal for a centrally located facility. Locating a transfer station facility here would result in “double backing of waste” as it heads

back up to Fort Bragg to Highway 20 on its way to its destination facility. However, this has not seemed to be as much of an issue for public self-haul.

A common concern related to remote transfer station locations in general is that difficult to access drop-off locations may result in increased illegal dumping. This can be mitigated however with appropriate signage and education of residents and tourists.

## Compliance History

The Caspar Transfer Station has an average compliance history with no major compliance issues of note. The facility is inspected monthly by Mendocino County Environmental Health as the Local Enforcement Agency for CalRecycle. If an Area of Concern is noted, the operator appears to remedy the issue swiftly. There have been no history of enforcement actions taken at the Caspar Transfer Station at the time of this report. A full CalRecycle compliance history can be found online on the CalRecycle website. See Appendix C.

## Land Use

Caspar is an existing transfer facility located in a remote area adjacent to a closed landfill. Generally, agencies prefer utilizing existing facilities for expansion as compared to greenfield construction.

As an existing facility, Caspar has active permits to operate. Based on a conceptual modification to allow for an expanded use of Caspar as a transfer station for the Coastal Region, it can be expected that Caspar's existing permits for land use, solid waste, coastal development would have to be modified to allow both commercial and self-haul wastes to the site, as well as any increase in tonnage or vehicles. It can be expected that these modifications would result in the need for the preparation of a CEQA document. The appropriate CEQA document would depend on if the proposed modifications would cause a significant environmental impact and if that impact could be mitigated. This would be determined by the permitting agency acting as the lead agency for CEQA purposes.

It is unlikely that a modification to Caspar would result in development in the forested areas, it is not anticipated that any biological impacts would occur. Caspar appears to have sufficient room for expanded operations in and around its current footprint.

As discussed previously, modified operations at this site would likely trigger improvements at the intersection of Highway 1 and County Road 409. If improvements were feasible, it would require an encroachment permit from CalTrans. However, the feasibility of improvements due to the location of the bridge is in question.

## Capital Improvements

The Caspar Transfer Station will need capital improvements to manage the waste stream of the region. The pro forma developed by Diversion Strategies (Appendix B) estimates the cost of

capital improvements for every scenario described in this report. Since all transfer station options will require an enclosed building with appropriate stormwater management systems in place, Diversion Strategies is estimating each project to have a design-build cost of \$1.9M. Of the \$1.9M, Diversion Strategies estimated \$250,000 of land acquisition cost, which could be deducted from the total in this scenario. Not included in this would be roadway improvement costs.

However, it is very likely that, if feasible, roadway improvements will be required at Highway 1 and County Road 409. The feasibility of this is questionable. If feasible, it can be expected that improvements would require an expansion of the roadway to put in a left turn lane, and possibly an acceleration lane. The proximity of the bridge makes this more complex. This cost of these improvements could be estimated to be in the millions of dollars if even feasible.

## Proforma

Both the operating and capital costs of developing the Caspar site to fit the present day needs of the region should be consistent with the other options and reflected in Appendix B.

The nature of the pro forma built for this project is that it can be adjusted based on the different variables at each site. For example, Diversion Strategies uses an assumed landfill disposal rate of \$45.00/ton. However, based on our conversations with Jerry Ward, he has secured a tip fee in the \$26.00-\$29.00/ton range. This will impact the assumed tip rate necessary for the facility.

## 2. Design, Build, Operate Contract: Highway 20 Transfer Station

The green-field development of a publicly owned transfer station at the Highway 20 location is still a viable project option if land can be acquired. As stated in the above section regarding the feasibility of the Central Coast Transfer Station in today's environment, many variables have changed, impacting both the capital and operating costs of managing a present day facility from then until present day.

As part of the due diligence in reviewing this model as an option moving forward for the County and City, Diversion Strategies undertook the following due diligence which is also summarized in the section earlier in this report. Please see sections on Gaps and Challenges and CCTS Project Feasibility Today.

The present day transfer station pro forma (Appendix B) estimates that the facility would have to be at an average tip rate/ton of \$107.60 with an average projected cash flow of \$171,029.00. The estimated capital outlay for the project including engineering design and permitting is \$1.9M. This estimate does not include the cost for roadway improvements to Highway 20.



### 3. Fort Bragg Disposal/Waste Management Pudding Creek Facility

When Diversion Strategies began the process of evaluating transfer station options for this project, we quickly learned that the Pudding Creek Transfer Station site could be a consideration for developing a present day transfer station to meet the needs of the City and County. Although one of the objectives for the CCTS was public ownership, our stakeholder interviews confirmed that this may not be as much of an objective anymore.

Pudding Creek is an existing site located on the northside of Fort Bragg at 219 Pudding Creek Road. It is owned by Fort Bragg Disposal/Waste Management. It is currently being used to consolidate and transfer all of the material Fort Bragg Disposal collects as a part of their collection contract with the City of Fort Bragg and unincorporated coastal Mendocino County. In addition, Fort Bragg Disposal operates a recycle buy-back center at the Pudding Creek facility as a requirement of their collection contract. All of the material is loaded in packer trucks and then transferred to Willits (see above: Coastal Region Waste Flow).

The Pudding Creek site is in need of substantial improvements to suit all the needs of the City and County for a Coastal Region transfer station managing both collected and self haul wastes. One of the major factors influencing this would be the need to incorporate the self-haul waste into the current facility footprint and flow. In addition, the other capital improvements noted for the other transfer station will still be a requirement for Pudding Creek (for example, covered receiving on commingled food and green waste, stormwater controls). In addition, Pudding Creek is required to construct a masonry wall around the outdoor transfer operations as a condition of its Use Permit in the event that the CCTS is not constructed.

#### Location and Traffic

Pudding Creek does have some proximity to over 60 homes just on the northside of Fort Bragg. There has been some concern about using this facility as the main transfer station because of the proximity to the City, increasing truck traffic through downtown Fort Bragg along Main Street. However, this concern can be easily mitigated by shifting hours for public drop off, buy-back and collection truck traffic to optimize traffic flow and limit congestion. Additionally, there is another gate that can be utilized on site to segregate public drop off from collection vehicles and help manage queueing off of Pudding Creek Road.. If Pudding Creek were to be the preferred transfer station option, a second gate could be operational to assist with traffic flow concerns.

Also, if Pudding Creek were to be the project of choice, the intersection of Pudding Creek Road with Highway 1 would require a traffic light to be installed. Currently, the intersection is controlled by a stop sign on Pudding Creek Road and through lanes on Highway 1. Stakeholder interviews confirmed that likely a light would have to be installed. However, it was indicated that the light may be able to be funded as part of a cost share including funds from the regional transportation authority for safety and operations funds.

## Compliance History

The Pudding Creek facility has an average compliance history with no major compliance issues of note. The facility is inspected monthly by Mendocino County Environmental Health as the Local Enforcement Agency for CalRecycle. If an Area of Concern is noted, the operator appears to remedy the issue swiftly. There have been no history of enforcement actions taken at the Pudding Creek facility at the time of this report. A full CalRecycle compliance history can be found online on the CalRecycle website. See Appendix C.

## Land Use

Pudding Creek is an existing transfer facility located north in the City of Fort Bragg. Generally, agencies prefer utilizing existing facilities for expansion as compared to greenfield construction.

As an existing facility, Pudding Creek has active permits to operate. Based on a conceptual modification to allow for an expanded use of Pudding Creek as a transfer station for the Coastal Region, it can be expected that the site's existing permits for land use and solid waste would have to be modified to allow both commercial and self haul wastes to the site, as well as any increase in tonnage or vehicles. The facility is located out of the Coastal Commission Coastal Zone. It can be expected that these modifications would result in the need for the preparation of a CEQA document. The appropriate CEQA document would depend on if the proposed modifications would cause a significant environmental impact and if that impact could be mitigated. This would be determined by the permitting agency acting as the lead agency for CEQA purposes.

As an existing site, modification at this site is not expected to have any biological impacts.

As discussed previously, modified operations at this site would likely trigger improvements at the intersection of Highway 1 and Pudding Creek Road. Although it's probable that the cost would be shared, it may still require an encroachment permit from CalTrans for any work done in the CalTrans right of way for the installation of a light. This would be confirmed as part of any design, engineering and CEQA evaluation.

## Capital Improvements

The Pudding Creek Transfer Station will need capital improvements to manage the waste stream of the region. The pro forma developed by Diversion Strategies (Appendix B) estimates the cost of capital improvements for every scenario described in this report. Since all transfer station options may require an enclosed building with appropriate stormwater management systems in place, Diversion Strategies is estimating each project to have a design-build cost of \$1.9M.

It should be noted that a condition of the Pudding Creek permit is that if the CCTS is not constructed, Pudding Creek will have to build a masonry wall around the outdoor transfer operations. We are assuming that if an enclosed and compliant facility is constructed on the

pudding Creek site, that would fulfill the requirements of the masonry wall condition or the condition would be removed in a Use Permit modification. Therefore, no additional cost to reflect this should be considered in the pro forma.

## Pro Forma

Both the operating and capital costs of developing the Caspar site to fit the present day needs of the region should be consistent with the other options and reflected in Appendix B.

## 4. Inclusion of Transfer Operations in the Upcoming Collections Request for Proposals

When Diversion Strategies began working on this project, we quickly learned that the City and the County were both in the process of putting the current collection contract out to bid for prospective service providers very shortly, as the current contract with Fort Bragg Disposal is set to expire in 2021.

The timing of the collection RFP, in addition to stakeholder feedback during the interviews that public ownership of the transfer station was not as much of an objective, confirmed our opinion that the transfer station operations could be a requirement of the upcoming collection contract RFP. With two of the likely proposers having facilities that could be improved to provide the City and County with a compliant transfer station option, this could be the best way for the City and County to get competitive bids for the collection, management, and transfer of their waste stream. It also provides an opportunity for bidders to consolidate both the collections with the transfer operations to offset costs to provide a competitive bid, including any cost for land and facility infrastructure.

### Length of Contract

If this option were to be chosen, the City and County could line up the length of the collection contract to the necessary amortization timeline of the new transfer station. In other words, the proposers would have the life of their collection contract to recover the capital outlay for the transfer station. Many jurisdictions operate this way to improve and incentivize efficiency and compliance.

Also, with a guaranteed length of contract, the selected service providers will have greater ability to secure both disposal capacity as well as organics capacity. With the addition of food waste to the organics stream, and the requirement to move stockpiled material quickly, guaranteed capacity at an organics facility will be essential for a compliant transfer station operation.

### Ownership

One of the drawbacks of this scenario is that, in most cases the County would not be the owner of the land, as originally conceived with the Central Coast Transfer Station. It is our assumption

that any of the proposers on the project would use their existing infrastructure. However, this may not be as much of an issue since stakeholder feedback has indicated that public ownership of the transfer station is not as much of an interest for the CCTS project.

As discussed earlier in this report, if the City/County still wants to pursue public ownership, they should strongly consider the pros and cons of owning a transfer station in the current regulatory and economic environment of the waste and recycling industry. The trend has been for jurisdictions to move away from facility ownership and toward ensuring excellent and compliant service through contractual obligations.

### Creativity and Competitive Pricing

Combining the collection contract with the construction of a compliant present-day transfer station has the advantage of soliciting more creative solutions and ensuring competitive pricing. Vertically integrated solutions where the collection through to transfer is managed and owned by the same entity, there is more of an opportunity for cost savings to be realized. This may be the County's best option to keep rates agreeable and still maintain compliance with regulatory requirements.

## 5. Other Locations for Considerations but Disregarded

During the preparation of this report, use of the Skunk Train for the transport of waste by rail was brought up. We reviewed this option but disregarded pursuing it as an option for the CCTS.

First, the Skunk Train's location is in the center of downtown Fort Bragg and is close to residents to the west. Access to the Skunk Trail property would require trucks to access the site from Main Street and then making a turn onto a narrow city street to get to the property.

Second, transportation of waste by rail would still require a transfer station operation for the receipt and consolidation of waste at the Fort Bragg end of the rail line, plus the cost and construction of infrastructure for the loading of rail cars as well as any track infrastructure (such as rail ties, rail, switches) along the rail line between Fort Bragg and Willits. Rail Infrastructure and transfer operations would also be required in Willits, necessitating a transfer operation at that end of the rail line, for transfer into a truck which would truck the waste to a destination facility.

In addition to trucks, rail cars would be needed for the transportation for waste by rail. Combined with the low tonnage of 35-50 tons per day, the added infrastructure needed at both Fort Bragg and Willits, plus the central location off of Main Street, use of the Skunk Train was not pursued as an option in this report.

# Evaluation of Coastal Region Sites

	<b>CCTS at Highway 20</b>	<b>Caspar Transfer Station</b>	<b>Fort Bragg Disposal/Fort Bragg Disposal Pudding Creek</b>
<b>Current Use</b>	Vacant property owned by the Department of Forestry as part of the Jackson Demonstration State Forest.	Existing outdoor transfer station for self haul wastes, adjacent to closed Caspar Landfill.	Existing hauling operation, maintenance facility, storage, public recycling buy back, and transfer operation for company collected wastes.
<b>Size</b>	The proposed transfer station footprint is approximately 4 acres with a 1 acre buffer	The transfer operation utilizes approximately 3 acres.	9 Acres
<b>Location</b>	Just east of the City of Fort Bragg, on the north side of Highway 20	South of the City of Fort Bragg, near Highway 1 and County Road 409.	On the north side of the City of Fort Bragg, near Highway 1 and Pudding Creek Road.
<b>Land Availability</b>	Not currently available. Proposed 3-way land swap involving the City/County, State Parks and Department of Forestry fell through after the certification of the project EIR.	Available, existing facility. Owned by Mendocino County	Existing facility, owned by Fort Bragg Disposal/Waste Management
<b>Access</b>	Access to the site would be directly off of Highway 20. Roadway improvements are proposed as part of the design that includes acceleration and deceleration lanes, and a left turn pocket.	Access to the facility is from Highway 1 to County Road 409 to Prairie Way. It has been determined that the intersection of Highway 1 and County Road 409 is a concern, especially for large truck traffic and the potential for expansion is limited due to a bridge just north of the intersection on Highway 1.	Access to the site is off of Pudding Creek Road via Highway 1. The majority of traffic will access the site from the south, routing traffic to and from the site along Main Street in downtown Fort Bragg.

	<b>CCTS at Highway 20</b>	<b>Caspar Transfer Station</b>	<b>Fort Bragg Disposal/Fort Bragg Disposal Pudding Creek</b>
<b>Distance to Receptors</b>	13 residents are located within 1000 feet of the facility, to the west and southeast of the project area.	Three residents are located within 1000 feet of the facility.	The facility is directly adjacent to 63 residences on the north and east sides of the facility.
<b>Permitting Status</b>	Other than a certified EIR, no permits have been obtained. An EIR may need to be updated.	Site is permitted for transfer operations.	Site is permitted for transfer operations.
<b>Expansion</b>	Not applicable. Site is not developed.	Facility would to be reviewed and redesigned for consolidated commercial and self haul transfer operations. Design may require features to minimize potential nuisance conditions such as odor, noise and dust. May require modification to existing permits.	Facility would to be reviewed and redesigned for consolidated commercial and self haul transfer operations. Design may require features to minimize potential nuisance conditions such as odor, noise and dust. May require modification to existing permits.
<b>Other</b>	Development would require land acquisition, permitting, a costly construction and operation via a Design, Build, Operation (DBO) bid process and contract.	Development at Caspar would still result in access issues at the intersection of Highway 1 and County Road 409 which would have to be addressed in a redesign. The facility is located in a neighborhood with an organized stakeholders group. Locating a transfer station at this location would utilize an existing site, however its location to the south of Fort Bragg would not resolve one of the concerns about "double backing" of traffic to and from the site, especially to Highway 20.	Facility is owned by a private company. Development at this site would likely require the installation of a traffic light at the intersection of Highway 1 and Pudding Creek Road. However, this may be able to be done as part of a cost share agreement. Although the facility is close to residences, the owner has reported a good relationship with the community and a history of few to no complaints. The facility would have to be redesigned and constructed to accommodate a transfer operation. However, with 9 acres, the site has plenty of space to accommodate the use.

# Recommendations

After careful review, consideration and analysis, Diversion Strategies offers the following recommendation for how to proceed.

## Inclusion of Transfer Operations in the Upcoming Collections Request for Proposals

Out of all the options presented in this report, Diversion Strategies recommends that the City of Fort Bragg and Mendocino County pursue the option of adding transfer operations to the upcoming collection RFP. As discussed in this report, this option allows qualified operators the ability to compete for the most economic and compliant option for the management of waste in today's regulatory environment. Especially in light of the challenges of developing the Highway 20 location, and the openness to private ownership of transfer operations, including transfer operations in the collections RFP creative, more cost effective solutions for the transfer of wastes from the Coastal Region. The City and the County can specify parameters in the Request for Proposal which align the transfer operations with the goals for the transfer operation such as traffic reduction, potential nuisance mitigations, pricing for transport of the waste to a destination facility such as composting and landfill, and greenhouse gas emissions/carbon footprint.

Based on best estimates for capital outlay (Development and Financing Sheet: Appendix B), and the volume of material generated by this region, Diversion Strategies believes that the estimates of \$1.9M can be recovered over a 15-20 year timeframe. If the collection contract is granted over this amortization term, we believe it will be enticing enough for at least the current operators to propose.

# **ATTACHMENTS**

## **APPENDIX A**



Interviews:

1. Rick Childs
2. Dan Djerde
3. Linda Ruffing
4. Steve Shamblin
5. Dave Turner
6. Jerry Ward
7. Ted Williams

Email:

1. Howard Daschiell

DRAFT

Interview Notes: Rick Childs

Interview Date: December 26, 2019

- Inefficiency was the main driver for the transfer station project. Would receive both self haul and curbside.
- Cost and efficiency led Mike Sweeney to create the CCTS, which would act as a one stop shop for everything. A state of the art facility that would send material directly to landfill.
- Siting study in 2007 to look at where the transfer station should go.
  - Looked at every available parcel 5 acres or larger. Top three were Casper, Pudding Creek and Highway 20.
  - There were 2 or 3 Highway 20 sites - the one selected was easiest to acquire.
  - Traffic, cost and politics. Led to numeric weightings
- Caltrans did not want the Highway 1/Road 409 turning access. Intersection is substandard. Bridge is too close to the intersection to provide space for trucks. This is a big factor.
- 409 opposition: politically organized.
- Highway 1 had fewest neighbor impacts, "least worst option"
- Problem with Highway 20 is that it is owned by Jackson State Forest. State law does not enable the giving or selling. Had to be comparable. As a result, it was set up as a three way switch.
  - JSF gave 17 acres to the county on Highway 20 . State Parks get control of landfill but the county would still own it.
  - Took 2 years to go through the legislature.
- EIR took several years. Only opponents were Sierra Club and a small number of Highway 20 residents. EIR was approved 4-0 by the Board of Supervisors and 3-2 by City Council.
- Sierra Club: issue with pygmy forest.
- Proposed mitigation. 25 acres put into permanent reserve.
- After EIR, there was a change at State Parks and withdrew from swap within a month of the EIR.
- Mike Sweeney retired in 2016. Essentially nothing has happened since then.
  - People who took over were ineffective on the project. No political pressure for the transfer station. Other priorities came up.
- Suggest contacting Timber companies.
  - Companies have been identified.
  - Letters were sent to timber companies, but it died out.
  - Did have a meeting with CalFire, and identified timber that could be adequate compensation.
  - Rick contacted two companies as a private citizen:
    - Mendocino Redwood. Wanted easement on Caltrans fire road. Jackson Forest wasn't willing to give permanent easement.
    - Redwood Sawmill. At first was interested for the right price.

- Ted Williams also made contact 3 months ago, but couldn't get the companies to be interested.
- Ted has also suggested use of eminent domain, such as what happened at Albion with Mendocino Redwood.
- Rick has brought up eminent domain to supervisors. 2 supervisors indicated only doing it as a last resort.
- Cost benefit of the project. Calculated a savings of \$30K per month. Calculations provided in comments for EIR.
  - Less miles driven, savings for haulers going to Pudding Creek and 409.
- Issue for Pudding Creek is truck traffic through town.
- CO2 reduction is also a big factor in EIR. reduced fuel with Highway 20 location.
- If Highway 20 happens, it is not resolved who would build and own it. County cannot because of the cost. Looked at bonds and taxes. Solution was to give a waste company a 25 year lease in exchange. Construction cost of \$4M.
- Jerry ward operates at Caspar. Goal is to make 409 permanent and use tip fees to improve.
- Pudding Creek has been an alternative for a long time. Owned by Waste Management.
- Fort Bragg merchants do not want trucks going through town.
- State Parks person was reassigned. The deal is not a plus for State Parks. Thinks if the transfer station is considered necessary and is a political benefit, perhaps management may change their mind.

Interview Notes: Supervisor Dan Djerde

Interview Date: February 21, 2020

- 20 years on City Council and Supervisor. On the Caspar coordinating committee. Joined MSWA last year
- Voted for EIR. Mike Sweeney indicated this would be cost-effective because of reduction of truck traffic
- Does the impact to the recycling market have any change in the economics of the project?
- Since Sweeney put together the EIR, Fort Bragg Disposal got rid of their pods. Analysis was based on 3 pod trucks instead of possum belly. Is there an improvement with the trucks?
- Fort Bragg Disposal says they are not interested in the highway 20 project
- CNS has expanded a bit in the Ukiah area - they are interested in putting in a bid. They regularly go to MSWA meetings these days.
- Regarding the economics, ultimately we won't know until we put something out to bid - if we do put it out to bid we will know if it is going to increase rates.
- It may be okay if rates go up a little if what we are getting is a guaranteed rate for the long term.
- Assumed Pudding Creek is too small. However, has heard that it's not that uncommon that the garbage company owns the transfer station site
- Doesn't want a bunch of truck traffic going through downtown, but there is less truck traffic going through town because there are no longer logging trucks.
- The information we had when it was voted on it looked good but has any information changed and is it viable.
- After State Parks pulled it, it was hard to justify time spent on it.
- The concept was to have the City/County own it so at the end of the contract that we would own the facility and we wouldn't be at the mercy of one garbage company owning the TS
- Caspar is out of the way. Access is across the bridge with no turn pocket or space for turn pocket on the bridge. Adding additional truck traffic seems like it would be complicating it
- The site itself is a little remote. Doesn't seem where you logically put a transfer station.
- Regarding Pudding Creek. There should be a traffic light there.
  - A lot of money is flowing into regional transportation agencies - not just for capacity but also safety and operation funds.
  - Caltrans would be on the hook for  $\frac{2}{3}$  of the cost.
  - Traffic light would be a benefit to those living in the area.
- Pudding Creek is not in the coastal zone.
- Pudding Creek would need improvements, including traffic. Queueing is an issue. Also, could a buffer or wall be created to separate the facility from the residents.

Interview Notes: Linda Ruffing

Interview Date: January 17, 2020

- Fort Braff is a remote rural community and the city has had difficulty getting people and solid waste entities to provide competitive bids for its solid waste franchise, and rates are high relatively.
- Issue has been in part driven by its cost to haul waste out of there and there isn't a commercial transfer to pack more waste in trucks going over the hill. It's less efficient.
- Three haulers have a presence in Mendocino county - SWW, Fort Bragg Disposal, C&S Waste Solutions. C&S
  - has submitted bids over the years, interest in getting into the coast but is located on 101.
- MSWA took the lead, and city was a very involved partner in trying to site a transfer station on the coast.
- Initially did a siting analysis. Looked at probably at least two dozen potential sites on the coast. Narrowed down the feasible sites and then sought direction from the county/city. Siting study ended up narrowing focus along Highway 20 corridor and Caspar site.
- Caspar should stay in the mix as an existing facility.
  - Although neighbors are opposed to expansion there, and the county may have promised to close it down, it's a viable facility despite challenges.
  - Biggest challenge is it is not optimally located. Caspar Creek bridge is an impediment to creating a sufficient left turn lane going up 409.
  - From a traffic standpoint, CalTrans has said the intersection is too close to the bridge.
- After looking at the siting study, the Board of Supervisors and City Council wanted to focus on the sites along the Highway 20 corridor.
  - Centrally located and efficient in terms of travel for collection vehicles and located on the way over the hill and out to a destination landfill.
- 6 sites along the corridor, along with Caspar, were evaluated at a much more detailed level.
- After that eval, the direction was to focus on the site on Jackson Forest land.
- Mike Sweeney was able to negotiate a deal with CalFire, which manages the forest, and State Parks. CalFire would transfer site to county, then county would put conservation easement over the Caspar site and shut it down, which would benefit Russian gulch state park that adjoins.
- State Assemblyman Chesboro passed legislation allowing this. It was a great concept. In many ways an ideal site with few neighbors.
- EIR was completed on Highway 20 site.
- In the time, CDFW defined the north coast bishop pine forest as a special community.
- When doing the EIR, the only issues ended up being biological. Some Pygmy Forest that is a protected plant community, and Bishop Pine forest. Mitigation plan included in the EIR.

- The other thing that came up during the EIR was that the State Parks superintendent who had been supportive left the agency. State Parks was lobbied successfully to back out of the deal and not transfer the property at top of 409.
- Mitigation of north coast bishop pine and pygmy can all happen on the Caspar site because it has similar plant communities.
- The challenge is that from a state perspective, they can't just sell the Jackson Forest to a public agency. Need to keep the forest whole. State Parks pulled out, and left the County with finding a suitable chunk of forest land with roughly the same acreage and habitat types to do a two way swap. By this point of time Mike Sweeney may have left.
- Sweeney's successor pushed forward, engaging with timber companies and identifying potential pieces of land they'd be willing to sell that we could swap.
- Hawthorne Timber was contacted. They have most of the holdings adjacent to Jackson Forest in the Coastal Region. They were difficult to tie down and remiss to do this.
- Also looking at Mendocino Timber Company, which is a little further inland.
- Between those two companies, if someone was focused on making swap happen, feels it could happen.
- One of the benefits to the corporate timber interests in having a commercial transfer station, to the extent it keeps disposal rates down, they will have less trash dumping in the forest. That is one of the reasons CalFire was and is still supportive.
- Feeling is that it is probably still viable, but not sure there is a staff person who is willing or capable of taking it on and really following it through.
- It is a good site. Location is everything and habitat issues can be mitigated,
- The EIR wasn't challenged. EIR is rock solid with a lot of attorney time put into it.
- The rates are really high in the city. Rates are much higher than even Fort Bragg Disposal's rate in the franchise area outside of the city. Part of that is that Fort Bragg Disposal has done some blending of their costs with more efficiently operated areas.
- Fort Bragg Disposal has a good reputation on the coast.
- Pudding Creek is owned by Fort Bragg Disposal. In terms of location, a problem is all garbage needs to go through town then back through town again. Site doesn't seem as advantageous as Highway 20.
- Highway 20 site plan was to create both a commercial and self haul transfer station and close Caspar. Caspar could remain open as a self haul facility. It is not as efficient operationally though as a transfer station managing both commercial and self haul.
- Alternate sites included the Mendocino Coast Recreation and Park District property a little further west. North of Highway 20 and west of Jackson site. It was taken off site list because the MCRPD has been in bankruptcy for years in part over this site and has a complicated land tenure on that site. That site also has pygmy and bishop pine issues greater than the transfer station site. Would have to do a new EIR. Has a lot more neighbors than the Jackson site.
- Another site, Leisure Time RV park was also vetted in the review process. Expensive, and would probably trigger some need for relocation assistance.

Interview Notes: Steve Shamblin  
Interview Date: January 15, 2020

- Got more involved with the transfer station until 4-5 years ago when he became district manager. Not directly involved, but for general inquiries when folks would ask.
- Didn't have any direct involvement as a service provider.
- Operation on the coast is for the city and unincorporated Mendocino County on the coast. These are two separate contracts.
- All waste through Fort Bragg disposal goes to Willits to SWW.
- Consideration informally has been made about Pudding Creek. Nothing has officially been done re capital analysis.
- Fort Bragg Disposal does own the facility, has usable acreage and infrastructure. Open to studying options.
- Logical to tie site utilization with collection contract.
- Fort Bragg Disposal is very interested in staying in that area. Overall interested in maintaining contracts and being a presence in the community.
- Fort Bragg Disposal has their own site there, and has a good portion of the infrastructure in place already.
- In general practical terms, it makes more sense to utilize an existing facility.
- Has good relationships with neighbors. Has had some changes over the years, notably going from the pod to a direct transfer system. The neighbors to the north - ocean lake mobile home park had issues with noise in the past but no complaints have been received in years. To the west is the cemetery. To the east is a large ranch property, and has a good relationship. Complaints are few and far between and generally very easily resolved.
- Site has 7 usable acres. Permitted as a transfer station, but not a public transfer station. Also a recycling center as well with a buy back center there.
- Runs about 7-9 routes on average per day, and runs 3-5 transfer trips to Willits per day. Has two separate classes of vehicles - Walking floor with 16-18 ton payload, and roll off transfer trailers at 18-20 tons.
- Also hauls all material (except for green) out of the Caspar station. 2 trucks per day there.
- May be concerned that even if traffic increase isn't high for trucks, the traffic increase for customers may be quite a lot. Would be concerned about traffic control at the intersection and facility.
- Expansion of the site may include constructing an additional driveway portion at the second gate.

Interview Notes: Dave Turner

Interview Date: December 23, 2019

- State parks didn't want to take part in the 3-way swap of land.
- Transfer Station first arose when he was on city council and negotiating renewal of waste haulers.
- Mike Sweeney was manager of MSWA - now Mendo Recycles - at the time. He said we really have to have a better deal. Fort Bragg Disposal was using Pods and they would send 3 pods on a truck over the hill to SWW who had a favorable deal with the landfill. SWW would then transfer to landfill from Willits. Fort Bragg Disposal is no longer using pods, and is doing that out of pudding creek now. All the self-haul goes to the transfer station at Casper on 409
- Realized the next time it went out to bid it would be good to have a transfer station that was built right. An efficient way to load out and sort.
- Looked at Pudding Creek, looked at the mill site, 409 location and a couple locations on Highway 20. Highway 20 was best because we have to pass it anyway. It shortens distance.
- Pudding Creek was bad because all loads would have to go through town. v
- This site the state was willing to swap for at that time, they still are if there is a landowner that could sell some land to do it. It would take some perseverance to find someone willing to sell something.
- No one appealed the EIR and its past the appeal point. If we go to a new location we would have to start all over. To go through CEQA and get it qualified is a big deal.
- Fort Bragg Disposal would like it on their property and would give them leg up on negotiations in future. It's really not the right location. Haven't even started looking at EIR there and neighbors would be a problem
- Environmentally the transfer station is a good thing: fewer truckloads, better payload, going straight to the landfill instead of dumping it.
- it really comes down to if the timber owners in the area that has anything adjacent to JSF that would be willing to sell equivalent parcels of land. It's not a high timber value.
- Have piece of land to swap add that to the cost of development and go forward
- The community surrounding Casper landfill has been told in the past that the project was going to go away. 409 is not the right place but there is not an obligation to move it.
- Highway 20, land swap aside - issues were all brought up but mitigations were made in the plan. Things were done in a way to answer any concerns that were brought up.



Interview Notes: Jerry Ward

Interview Date: January 3, 2020

- Been accepting Fort Bragg garbage since 2000. Processing garbage and recyclables.
- Good relationship with Fort Bragg Disposal. Although competitors, they have a good working relationship.
- Currently has a joint powers agreement with City, Willits and County that includes Willits and the area around Fort Bragg to transport waste. Began in 2000 and due to expire in 2015.
- Originally the CCTS would be operational by 2015. That was the expiration of the contract. When it was realized it wouldn't be built, he entered an option agreement with Fort Bragg, Willits and county to continue to accept, process and transport their waste.
- County and City went out to bid on operation of Caspar transfer station. Fort Bragg Disposal, and SWW were the only bidders. Contract was supposed to expire in 2017, due to the development of the CCTS. Mike Sweeney at the time, went to the Board and extended the contract to 2022.
- Contract made sense at the time. Would collect \$3 cubic yard in rent at Caspar, which would go towards developing CCTS.
- CCTS EIR is done, but can't come up w location and it doesn't make sense because of the capital cost. Put money towards something that makes better sense.
- The Willits transfer station is a large volume facility in Willits where he accepts all waste from franchise agreements. Waste is load checked, and hauled to potrero hills landfill in Solano County.
  - Landfill agreement with Waste Connections goes to 2045 with a cost of living increase and disposal rate at \$29/ton.
- In concept, the CCTS was a good idea. Just too expensive compared to the status quo.
- Back of napkin math is it would cost around \$130-150/ton to do it, with a 25 year amortization. You won't get a landfill agreement to convert that 25 years. After 5-10 years, landfill rates will be renegotiated to a lot more than CPI. The ratepayer ends up eating it.
- Ratepayer exposed to much higher rates down the road when already too high.
- Currently - \$79/ton not including transport from Fort Bragg to Willits.
- The \$5-6mil estimate for CCTS does not include the property.
- In the next bid, consider an option where the bidder is able to put in building, top load trailers and direct it to landfill.
- Caspar could continue operation for \$450K. Caspar is a great spot with plenty of room.
  - Instead of the 50 cubic yard boxes - increase the ramp area, put in a brooks structure and dump directly into a possum belly trailer. You won't get full weight, but better than 2-50cy loads to Willits.
  - Would move those bins out of the roofed area and put recycling bins there. When those are full, dump those trailers, push to walking floor trailers and direct that to Willits for processing.
  - Reduce truck traffic by consolidating, minimize and be more efficient with tonnage going out.

- For 30 months, collect \$3/cy, pay for those improvements, then after 30 months, the \$3 would go away.
- SWW took over in 2011 and really cleaned it up.
- Has told the community, explaining if we could develop into trailer operation, it can minimize operation. In the long run, because of operations and reputation, that facility can be maintained without any issues. Keep the road clean, well operated.
- Scrap metal has one truck going out for every two weeks.
- Green Waste No food at this time. Hauled to Cold Creek Compost using a 45 foot walking floor trailer. Contract in place until 2022.
  - Self hauled yard waste
  - For a little money, you can put in a three sided building and put green waste under that. Could even accept food.
  - Currently takes food in Willits, knows how to operate, just want to minimize investment in Caspar.
  - Self haul green waste tonnage is approximately 700 tons per year.
- Jerry put together a proforma on the coastal transfer station back in 2018.
- Mike Sweeney had a Taj Mahal for what he wanted to do. Doesn't have to be that sophisticated.
- Just need a long term plan for what is best for the ratepayer.
- The 409 group would still like to see everything go somewhere else.
- If presented right, and overall decision is to save ratepayer money by not building the CCTS, you are looking at significant increases in rate. \$130/ton compared to \$79/ton.

Interview Notes: Supervisor Ted Williams

Interview Date: February 21, 2020

- None of the potential land swap partners seem to be interested. Conversations have been had pretty recently
- Skunk Trial, when they get tunnel open, would they be willing to rail to willits. Inexpensive way to haul the trash.
  - They have property bordering the mill site
  - They have space loading and unloading at their rail yard.
- The Coast wants to build the highway 20 site. Only 2 supervisors want that and the other ones don't want to give the funds.
- Working with potential facility operators to find out how much of a subsidy they need
- Think it's a great idea to include the transfer in the RFP for collection and see what bidders come back with.
- The public will not be happy about going through the motions having a plan and not have funding. If we're short a million dollars better to know that now.
- The only concern about pudding creek is trucks going through town.
- VMT is better going to pudding creek or highway 20 as compared to Caspar.
- Need to consider carbon footprint of additional truck trips
- Caspar - the public hates it and the intersection is not adequate. Has seen a lot of wrecks there.
- Use of eminent domain could be done only if timber companies are willing to participate - but they need to be willing. Otherwise costly and takes too much time.

Email Communication:  
Howard Daschiell

From: **Howard Dashiell** dashielh@mendocinocounty.org  
Subject: Re: City of Fort Bragg- Central Coast Transfer Station project  
Date: December 8, 2019 at 2:47 PM  
To: davet@fiobeds.com, tvarga@fortbragg.com, lindaruffing@gmail.com, rick@mcn.org, Steve Dunicliff  
dunnics@mendocinocounty.org, swow@pacific.net, sshambli@wm.com  
Cc: erin@diversionstrategies.com, rachel@diversionstrategies.com, Tabatha Miller TMiller@fortbragg.com

HD

Hi Tom:

Well I suppose Howard can give my opinions... my position through the years is to see this as a Board & Council decision... I have stayed out of it... but, here goes - I will try and state my reasons:

- 1) I don't want to see curb side collection go back to Caspar for transfer. Lets face it most of the waste flow comes from Fort Bragg area and haul to Caspar then back up to HWY 20 is not the best. The people on County Road 409 will mount a vigorous opposition and even though it's not in writing a past County District 4 Supervisor said the garbage trucks would not come back after the dump closed in the 90s.
- 2) If the triple flip is off then is there is any other "Industrial Land" adjacent to HWY 20 going towards Willits? Maybe around Farm Feed Store? Somewhere out HWY 20 is best.
- 3) I know this is "taboo" but why not near the south main gate of the old Georgia Pacific property. The argument against Pudding Creek (which is the default if we don't do anything) is having all the solid waste come through downtown. The southerly main gate has good access onto HWY 1... short distance to HWY 20... then off to Willits. I am not saying to use the best land right on the shore line... tuck the transfer station back up along the highway... plant a bunch of trees and screen it.

Anyway... this is probably the last any of you will here from me on this but thats where I an at.

Cordially,  
Howard N. Dashiell, Director  
Mendocino County Department of Transportation  
340 Lake Mendocino Drive  
Ukiah, CA 95482  
[\(707\)463-4363](tel:(707)463-4363)  
[\(707\)463-5474](tel:(707)463-5474) FAX  
County Engineer – County Surveyor – Road Commissioner

DR

# **ATTACHMENTS**

## **APPENDIX B**

<Insert .pdf Proforma Sheets in final draft>

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# **ATTACHMENTS**

## **APPENDIX C**

Name	Date	Author
Agenda Item Summary: Receive Report And Consider Adoption Of City Council Resolution Certifying The Environmental Impact Report For The Central Coast Transfer Station Project, Adopting Findings Of Fact, Adopting A Mitigation Monitoring Program, And Approving The Implementation Of The Project	September 19, 2016	M. Sweeney
Agenda Memo to Board of Supervisors & Fort Bragg City Council - Request for consent to amend County/City offer for land exchange concerning a potential solid waste transfer station site on 17 acres of Jackson State Demonstration Forest	December 18, 2010	M. Sweeney
Aerial map: Highway 20 North Transfer Station Site 30075 Highway 20, Fort Bragg	October 18, 2013	
Cal Pub Resources Code § 4659		
Caspar JPA First Amendment re: Resolution	2016	Dave Turner, Mayor
Caspar Transfer Station Inspections <a href="https://www2.calrecycle.ca.gov/swfacilities/Directory/23-AA-0028/Inspection">https://www2.calrecycle.ca.gov/swfacilities/Directory/23-AA-0028/Inspection</a>		CalRecycle
Caspar Transfer Station SWIS Page <a href="https://www2.calrecycle.ca.gov/swfacilities/Directory/23-AA-0028/">https://www2.calrecycle.ca.gov/swfacilities/Directory/23-AA-0028/</a>		CalRecycle
City of Fort Bragg Request For Proposals For Appraisal For Newman Watershed Property	November 27, 2013	
Conditional Use Permit: Fort Bragg Disposal	2015	City of Fort Bragg
Excel sheet: Project Improvements		
First Amendment To The Joint Powers Agreement Between The County Of Mendocino And City Of Fort Bragg For Caspar Landfill And Solid Waste Transfer Station	July 21, 2015	
Fort Bragg Disposal Inspections <a href="https://www2.calrecycle.ca.gov/swfacilities/Directory/23-AA-0036/Inspection">https://www2.calrecycle.ca.gov/swfacilities/Directory/23-AA-0036/Inspection</a>		CalRecycle
Fort Bragg Disposal SWIS page <a href="https://www2.calrecycle.ca.gov/swfacilities/Directory/23-AA-0036/">https://www2.calrecycle.ca.gov/swfacilities/Directory/23-AA-0036/</a>		CalRecycle



<a href="https://calrecycle.ca.gov/SWFacilities/Permitting/CEQA/Documents/EIR/Types">https://calrecycle.ca.gov/SWFacilities/Permitting/CEQA/Documents/EIR/Types</a>		
<a href="https://ceqanet.opr.ca.gov/2014012058/3">https://ceqanet.opr.ca.gov/2014012058/3</a>		
<a href="https://city.fortbragg.com/169/Community-Development">https://city.fortbragg.com/169/Community-Development</a>		
<a href="https://mendorecycle.org">https://mendorecycle.org</a>		
<a href="https://www.advocate-news.com/2016/09/21/central-coast-transfer-station-eir-approved/">https://www.advocate-news.com/2016/09/21/central-coast-transfer-station-eir-approved/</a>		
<a href="https://www.califaep.org/ceqa_flowchart.php">https://www.califaep.org/ceqa_flowchart.php</a>		
<a href="https://www.calrecycle.ca.gov">https://www.calrecycle.ca.gov</a>		
<a href="https://www.mendocinocounty.org/government/assessor-county-clerk-recorder-elections">https://www.mendocinocounty.org/government/assessor-county-clerk-recorder-elections</a>		
<a href="https://www.mendocinocounty.org/government/planning-building-services">https://www.mendocinocounty.org/government/planning-building-services</a>		
<a href="https://www.swowservices.com">https://www.swowservices.com</a>		
<a href="https://www.ukiahdailyjournal.com/2015/07/14/central-coast-transfer-station-eir-to-be-considered-in-fort-bragg/">https://www.ukiahdailyjournal.com/2015/07/14/central-coast-transfer-station-eir-to-be-considered-in-fort-bragg/</a>		
<a href="https://www.ukiahdailyjournal.com/2015/08/12/fort-bragg-central-coast-transfer-station-discussion-delayed-again/">https://www.ukiahdailyjournal.com/2015/08/12/fort-bragg-central-coast-transfer-station-discussion-delayed-again/</a>		
<a href="https://www.wm.com/location/california/cabay/fort-bragg/index.jsp">https://www.wm.com/location/california/cabay/fort-bragg/index.jsp</a>		
Letter to Beth Pine- Subject: Newman Watershed Property Acquisition	March 28, 2014	Linda Ruffing, City Manager
Letter to Highway 20 Resident	October 18, 2013	Dan Hamburg, Chairman, County of Mendocino Board of Supervisors Dave Turner, Mayor, City of Fort Bragg
Letter to Mendocino Coast Recreation & Park District Subject: Purchase Offer to MCRPD Regional Park & Golf Course Property	September 19, 2013	Linda Ruffing, City Manager
Letter to Mendocino Coast Recreation & Park District Subject: Purchase Offer to MCRPD Regional Park & Golf Course Property	October 15, 2013	Linda Ruffing, City Manager
Letter to Robert Carlson, Director Re Central Coast Transfer Station	March 201, 2018	Gerald W. Ward, Solid Waste Services

Letter to Tabatha Miller, City Manager Re Central Coast Transfer Station Council Meeting	May 9, 2019	Gerald W. Ward, Solid Waste Services
MCRPD Highway 20 property purchase agreement -partially signed		
Memo to Board of Supervisors & Fort Bragg City Council re: Central Coast Transfer Station approvals, joint meeting September 19, 2016	September 9, 2016	Mike Sweeney
Memo to Board of Supervisors & Fort Bragg City Council re: Central Coast Transfer Station approvals, joint meeting September 19, 2016	September 9, 2016	Mike Sweeney
MSWMA Central Coast Transfer Station Draft Environmental Impact Report	February 2015	GHD, Inc.
MSWMA Central Coast Transfer Station Memo re: Provide Alternative Solutions		Jerry Ward
MSWMA EIR Comments, Final Environmental Impact Report	June 2015	GHD, Inc.
MSWMA Memo re Mileage Saving	August 14, 2015, revised January 8, 2015	Mike Sweeney
MSWMA Response to Comments - Revised Final Environmental Impact Report	September 2016	
MSWMA Response to Comments, Final Environmental Impact Report	June 2015	GHD, Inc.
MSWMA Revised Draft Environmental Impact Report	April 2016	
MSWMA Revised Transfer Station Work Plan	November 10, 2011	Mike Sweeney
MSWMA Transfer Station Work Plan	October 24, 2011	Mike Sweeney
Newman Watershed Appraisal	January 18, 2014	Dana W. Burrell
Notes on Rec District Highway 20 Property – Potential Acquisition by City of Fort Bragg	February 14, 2011	
Preliminary Project Description Transfer Station, redlined		
Purchase And Sale Agreement And Joint Escrow Instructions	November 13, 2013	
RESO - Exhibit A Findings of Fact		
RESO - Exhibit B MMRP	September 2016	
RESO 3669 Authorizing Execution of Purchase Agreement for MCRPD Hwy 20 Property		
RESO Central Coast TS Project Approvals (1)		

RFP for Consulting Services: Central Coast Transfer Station	2019	City of Fort Bragg
Solid Waste Facility Permit: Solid Waste of Willits		CalRecycle
Solid Waste Registration Permit: Caspar Transfer Station		CalRecycle
Solid Waste Registration Permit: Fort Bragg Disposal		CalRecycle

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