Chapter 6 – Comments and Coordination

6.1 Introduction

Early and continuing coordination with the general public and appropriate public agencies is an essential part of the environmental process to determine the scope of environmental documentation, the level of analysis, potential impacts and avoidance, minimization, and/or compensation measures and related environmental requirements. Agency consultation and public participation for this project have been accomplished through a variety of formal and informal methods, including: project development team meetings, interagency coordination meetings, public scoping meetings, City Council workshops and more.

This chapter summarizes the results of the City's efforts to fully identify, address, and resolve project-related issues through early and continuing coordination.

6.2 Project Development/Public Participation

Since 2006, the City has engaged the community in a wide variety of planning activities with regard to the proposed project. Outreach for the project included, but was not limited to the following:

- Three walking workshops in January and February 2010, which had 314 participants.
- A 2010 survey of neighbors within 0.5 mile of the project site and participants in the walking workshop. Fifty-four neighbors and 38 walking workshop participants completed the survey.
- A three-day design charrette in September 2006. A second design charrette in February 2010.
- Seven City Council workshops during which design alternatives and refinements were presented to City Council for City Council direction.
- Two years of consultation meetings with Sherwood valley Rancheria Tribal Council to modify the design in order to minimize impacts to cultural resources.
- Additional meetings with City Council to finalize the revised design based on negotiations with SVR.

6.3 CEQA/NEPA Scoping Process

The City recently completed the CEQA process for the proposed project. At one time, a joint NEPA/CEQA environmental document was to be prepared for the project. Due to funding and timing constraints, the CEQA process was completed first. A scoping process was also completed for the NEPA document, although the NEPA process was abandoned after the federal funding was returned to the Federal government.

The City has taken steps to maximize opportunities to participate in the environmental review process for this project. During the environmental determination process, an effort was made to contact various federal, state, regional, and local governmental agencies and

other interested parties to solicit comments and inform the public of the proposed project. This included holding agency scoping meetings and three well-attended public scoping meetings on December 2, 2009, January 14, 2010, and April 5, 2010. Agencies invited to the agency scoping meetings included the Department, USFWS, CDFW, RWQCB, California Coastal Commission, Coastal Conservancy, and the Department of Parks and Recreation.

The Notice of Preparation (NOP) for the EIR was distributed on December 2, 2009 and revised to include the South Parkland component on March 2, 2010. The Notice of Preparation for the Subsequent EIR was distributed on October 4, 2013. The proposed project was described, the scope of the environmental review was identified, and agencies and the public were invited to review and comment on the NOP. The close of the NOP for the subsequent EIR was November 4th 2013.

Agencies, organizations, and interested parties not contacted or who did not respond to the request for comments about the project during the preparation of the Draft EIR had the opportunity to comment during a 45-day public review period on the Draft EIR. At the conclusion of the comment period, the City responded to all comments received and certified the Final EIR at a public hearing in August 2011.

Chapter 7 – List of Preparers

This Subsequent EIR has been prepared by Marie Jones, Community Development Director of the City of Fort Bragg with assistance from SWCA Environmental Consultants (SWCA).The following is a list of individuals responsible for preparation of the EIR.

Responsibilities	EIR Preparer
Proposed Project	Marie Jones, City of Fort Bragg
Traffic and Transportation Visual / Aesthetics Water Quality and Stormwater Runoff Geology / Soils / Seismic / Topography Hazardous Waste / Materials Air Quality	Marie Jones, City of Fort Bragg Keith Miller, SWCA
Cultural Resources	Marie Jones, City of Fort Bragg Thad Van Bueren
Land Use	Marie Jones, City of Fort Bragg Emily Creel, SWCA
Biological Environment	Matt Richmond, WRA Marie Jones, City of Fort Bragg
Document Graphics	Marie Jones, City of Fort Bragg
Technical Editing	Marie Jones, City of Fort Bragg

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Chapter 8 – Distribution List

State of California Departments

☒ Resources
☒ Caltrans District 1
☒ Fish and Wildlife
☒ Parks and Recreation
☒ Office of Historic Preservation
☒ Sherwood Valley Rancheria
☒ Coastal Commission
☒ Air Resources Board
☒ RWQCB: Region # 1

Federal Departments

☒ Bureau of Land Management
☒ U.S Fish and Wildlife

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Appendix A – NOP & CEQA Checklist

DATE: SEPTEMBER 30, 2013

TO: INTERESTED PARTIES

FROM: CITY OF FORT BRAGG COMMUNITY DEVELOPMENT DEPARTMENT

SUBJECT: **COMMENT PERIOD FOR DRAFT SUBSEQUENT EIR**

PROJECT TITLE: FORT BRAGG COASTAL RESTORATION AND TRAIL PROJECT **SUBSEQUENT EIR**

PROJECT APPLICANT: CITY OF FORT BRAGG

RESPONSES DUE BY: NOVEMBER 1, 2013

The City of Fort Bragg (City) is the California Environmental Quality Act (CEQA) lead agency for the development of the North Fort Bragg Coastal Restoration and Trail project. The City of Fort Bragg will prepare a Subsequent Environmental Impact Report (EIR) for the project described in the attached project description.

1. The City of Fort Bragg held three public scoping meetings for this project in 2009.
2. A Certified EIR was adopted for the project in 2011.
3. In 2012 and 2013 the City of Fort Bragg and Sherwood Valley Rancheria engaged in consultation about the project and as a result of these discussions the City proposes to revise the project in order to further minimize impacts to cultural resources and Traditional Cultural Properties. Most of the proposed changes to the project description have resulted from input from the tribe.
4. Additionally the State Parks component of the project will not be analyzed in the subsequent EIR as this project has already been implement under the certified EIR for this project.
5. In September of 2013 The City Council considered the proposed changes and recommended that staff complete a subsequent CEQA document to address the proposed design changes.

The detailed project description, preliminary project design, project location, and the probable environmental effects are contained in the attached materials and are available at the City of Fort Bragg at 416 N Franklin Street, Fort Bragg CA 95437. If you have any questions regarding the NOP or the proposed project, please contact Ms. Jones at (707) 961-1807.

Signature _____

Marie Jones
City of Fort Bragg
Community Development Director

NOTICE OF PREPARATION OF A SUBSEQUENT ENVIRONMENTAL IMPACT REPORT FOR THE FORT BRAGG COASTAL TRAIL

- **PROJECT DESCRIPTION AND LOCATION**

Refer to Attachment A, Project Description.

- **SCOPE OF THE EIR/EA**

The following discussion outlines the issues that will be addressed in the EIR, based on the probable environmental effects associated with the proposed project, as identified by the City. **Please indicate any additions or corrections to the proposed scope of work as part of your response to this Notice of Preparation**. The EIR will include the following project components:

1. *Summary*. The summary section will include a summary of the project alternatives, as well as a summary of impacts and mitigation measures.
2. *Project Description*. The project description will include a description of the project site location and a legal description; a detailed description of the actions comprising the construction of the trail and restoration plans.
3. *Environmental setting*. This section will describe the physical setting and existing uses, surrounding land uses and cumulative development scenario.
4. *Environmental Impact Analysis.* This section will include a discussion of the anticipated significant and potential environmental consequences of the proposed project. Avoidance and minimization measures will be recommended to reduce potential impacts to a level of less than significant. The environmental impact topics to be included will be an inclusive list (refer to Attachment B, CEQA Initial Study Checklist), as follows:
    - Aesthetics/Visual Resources
    - Air Quality
    - Biological Resources
    - Climate Change
    - Cultural Resources
    - Geology and Soils
    - Hazards & Hazardous Materials
    - Land Use & Planning
    - Transportation & Circulation
    - Water Quality & Stormwater Runoff

    Based on the analysis in the 2011 Certified EIR, and the proposed changes to the project, the following resource areas are expected to have less than significant impacts and will not be addressed in individual sections:
    - Agricultural Resources
    - Mineral Resources
    - Noise
    - Population and Housing
    - Public Services
    - Utilities and Service Systems
    - Recreation

5. *Alternatives Analysis.* This chapter will provide an analysis of project alternatives.

6. *Environmental Analysis*. This chapter will explore growth inducing impacts and any significant irreversible environmental changes.

7. *Mitigation and Monitoring Plan*. This chapter will include a detailed mitigation and monitoring plan for the project.

8. *References and Report Preparation*. The section will list those involved with preparation of the subsequent EIR and those to whom the document was provided for review.

9. *List Appendices*. These chapters will list all technical documents referred to in the EIR, the CEQA checklist, and other documents, as applicable.

ATTACHMENT A

- **Project Description**

FORT BRAGG COASTAL RESTORATION & TRAIL PROJECT
PROJECT DESCRIPTION

1 PROJECT LOCATION AND EXISTING CONDITIONS

The Fort Bragg Restoration and Coastal Trail Project (project) is located on the Mendocino Coast, within the City of Fort Bragg (refer to Figure 1). The project site includes three parcels and some right-of-way, and each site is described in detail below.

Project Location

The project is located on the Mendocino Coast, within the city of Fort Bragg (refer to Figure ES-1). The project site includes three parcels and a portion of a public right-of-way (ROW). Two of the parcels are located on the approximately 400-acre (ac) former Georgia-Pacific lumber mill (Mill Site). Each parcel and the ROW are described in detail below and shown in Figure ES-2.

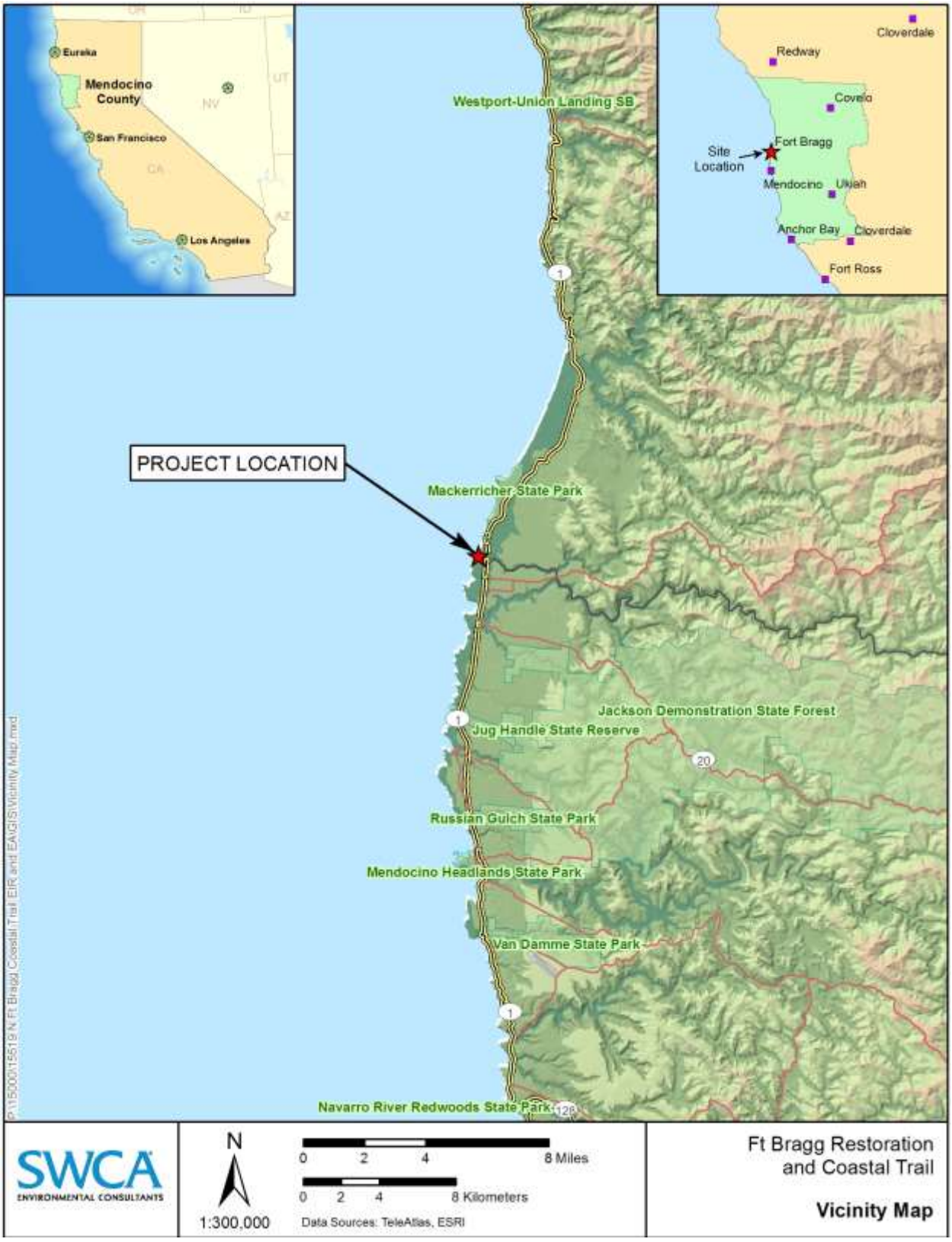
1. **North Parkland.** The North Parkland includes 25 ac and is located on the Mill Site immediately south of the Glass Beach Headlands. It extends east from the Pacific Ocean and is approximately 110 feet (ft.) wide but varies in width due to the variegated bluff edge. The North Parkland also includes a 50-ft wide piece of the northernmost edge of the Mill Site extending from the ocean to Elm Street. The site is currently an unused finished lumber storage area. Approximately 80% of the site is covered by pavement and/or hard packed gravel, and is not open to the public.

2. **Glass Beach Drive Right-of-way.** The Glass Beach Drive ROW, owned by the City, is a 60-ft wide ROW that extends from the end of the Pudding Creek Trestle Bridge to Elm Street (refer to Figure ES-2). The ROW is currently developed with a 5-ft wide sidewalk (eastside), the 34-ft wide Glass Beach Drive, and a drainage swale and associated infrastructure. An informal parking area exists on the southern edge of the ROW, adjacent to Glass Beach Headlands, and an 18-space developed parking area is located at the northern terminus of Glass Beach Drive at the Pudding Creek Trestle Bridge.

3. **South Parkland.** The South Parkland includes 57 ac, approximately 20% which is currently paved with asphalt or compressed gravel. This area is bordered on the north by the City's wastewater treatment plant, the west by the Pacific Ocean, the east by the Mill Site, and the south by Noyo Bay. The area was formerly used, in part, as a lumber operations mill, fill disposal, a cemetery, an airstrip, and for log storage.

4. **Glass Beach Headlands.** The Glass Beach Headlands, owned by the California Department of Parks and Recreation (State Parks), is a 37-ac day use area. It is the southernmost portion of MacKerricher State Park. The site is currently used by pedestrians for beach and ocean access and includes populations of sensitive plants and coastal habitats. Only the southernmost 100 feet of this parcel would be utilized for this proposed project.

Figure 1. Project Vicinity Map



2 BACKGROUND AND NEED FOR THE PROJECT

In 2002, the City initiated a community-based planning process that identified the Coastal Trail as the most important community goal for the re-use of the Mill Site. Subsequently, the State Coastal Conservancy awarded a $4.165 million grant to the City to purchase 35 ac of parkland on the Mill Site. As part of the acquisition, Georgia Pacific donated a 110-ft wide "Coastal Trail corridor." The City acquired the property in January of 2010.

In 2006, the Fort Bragg community participated in a three-day design charrette to create a cohesive plan for the joint parkland areas. The results of this community process and three subsequent City Council workshops form the basis for the subsequent Draft Coastal Trail Master Plan (City of Fort Bragg et al. 2008), the preliminary design plans, and the project description for this EIR.

In 2009 and 2010, the Fort Bragg community participated in a variety of planning activities for the South Parkland parcel, including three walking workshops (attended by over 300 people), a three-hour community design charrette workshop, an open-house, and a community survey returned by 94 residents. The community input and priorities expressed through these meetings, workshops, and survey form the basis for the design for the South Parkland parcel and project description.

In 2012 and 2013 the City of Fort Bragg and Sherwood Valley Rancheria engaged in consultation about the project and as a result of these discussions the City proposes to revise the project in order to further minimize impacts to cultural resources and Traditional Cultural Properties. Most of the proposed changes to the project description have resulted from input from the tribe.

Additionally the State Parks component of the project originally analyzed in the 2011 Certified EIR has already been implemented and will not be analyzed in this subsequent EIR.

In September of 2013 The City Council considered the proposed changes and recommended that staff complete a subsequent CEQA document to address the proposed design changes.

3 PROJECT OBJECTIVES

The purpose of the project is to:

- Restore native habitats throughout the proposed parkland;
- Establish a permanent trail system, which was the single most important goal for the reuse of the Mill Site in a 2003 community survey, and has been identified during over 30 community and City Council meeting as a priority project for the City of Fort Bragg;
- Establish public access to the site, a condition of Coastal Conservancy funding for the acquisition of the site in 2010;
- Establish parking, restroom and other amenities to accommodate public access to this portion of the California Coastal Trail; and

- Establish an effective storm water management system for the site to reduce erosion and bluff retreat.

The need arises from:

- Lack of public access (and limited public access) to the entire 3.5 mile Fort Bragg coast along the Mill Site;
- State goals to establish a California Coastal Trail, along the entire coast of Fort Bragg, of which this is a segment of the California Coastal Trail;
- Acquisition of the site with Coastal Conservancy funding for public access and as part of the California Coastal Trail;
- The historical, and now abandoned, use of the site as a lumber mill, which resulted in extensive site disturbance, grading and coverage of the site in asphalt and heavily compacted gravel surfaces which now must be restored in order to provide for public access and reduce stormwater induced erosion of the site; and
- Demand for increased coastal access and passive recreational opportunities in Mendocino County.

Due to damage caused by historic uses of the project site, habitat restoration is an important component of the project. Nearly the entire North Parkland parcel east of the bluff (approximately 23 ac) is paved with asphalt or heavily compacted gravel surfaces, although a few small populations of native plants have been identified along the bluff edge. On the South Parkland parcel, about 10 ac of the site are paved or impacted with compacted gravel surfaces. The majority of these compacted gravel and asphalt surfaces (with the exception of the abandoned runway) will be removed or covered with a sand/soil and the sites will be restored with native vegetation.

1. Purpose of the Subsequent EIR

The purpose of the Subsequent Environmental Impact Report (EIR) is to identify the potential significant impacts of the revised design of the Fort Bragg Coastal Restoration and Trail Project (proposed project or Coastal Trail) on the environment, indicate the manner in which such significant impacts will be mitigated or avoided, and identify alternatives to the proposed project that avoid or reduce these impacts. An EIR was certified for this project in 2011, and the need for a subsequent EIR and revised design arises from the following causes.

1. The project design has been modified through a consultation process between the City of Fort Bragg and Sherwood Valley Rancheria in order to minimize impacts to cultural resources. All of the proposed design revisions minimize impacts to cultural resources but may have other impacts (traffic, visual, biological) that require analysis and possibly new mitigation measures.

2. The project design has been modified to remove State Park's restoration project on Glass Beach headlands from the project as this project has already been completed under the initial EIR and the removal of this component of the project from the design analyzed in the

subsequent EIR will make the implementation of the Mitigation and Monitoring plan straightforward as all mitigation measures will apply only to the Fort Bragg trail project.

This Subsequent EIR analyzes the revised project and is intended to serve as an informational document for use by the City of Fort Bragg (City), the California Environmental Quality Act (CEQA) lead agency; the other responsible agencies; and the general public in their consideration and evaluation of the environmental consequences associated with the implementation of the proposed redesigned project.

The EIR will address potentially significant impacts to Aesthetics, Air Quality, Biological Resources, Climate Change and Energy, Cultural Resources, Geology and Soils, Hazards and Hazardous Materials, Transportation and Circulation, and Water Quality and Stormwater.

Figure 2. Project Site Map North Parkland

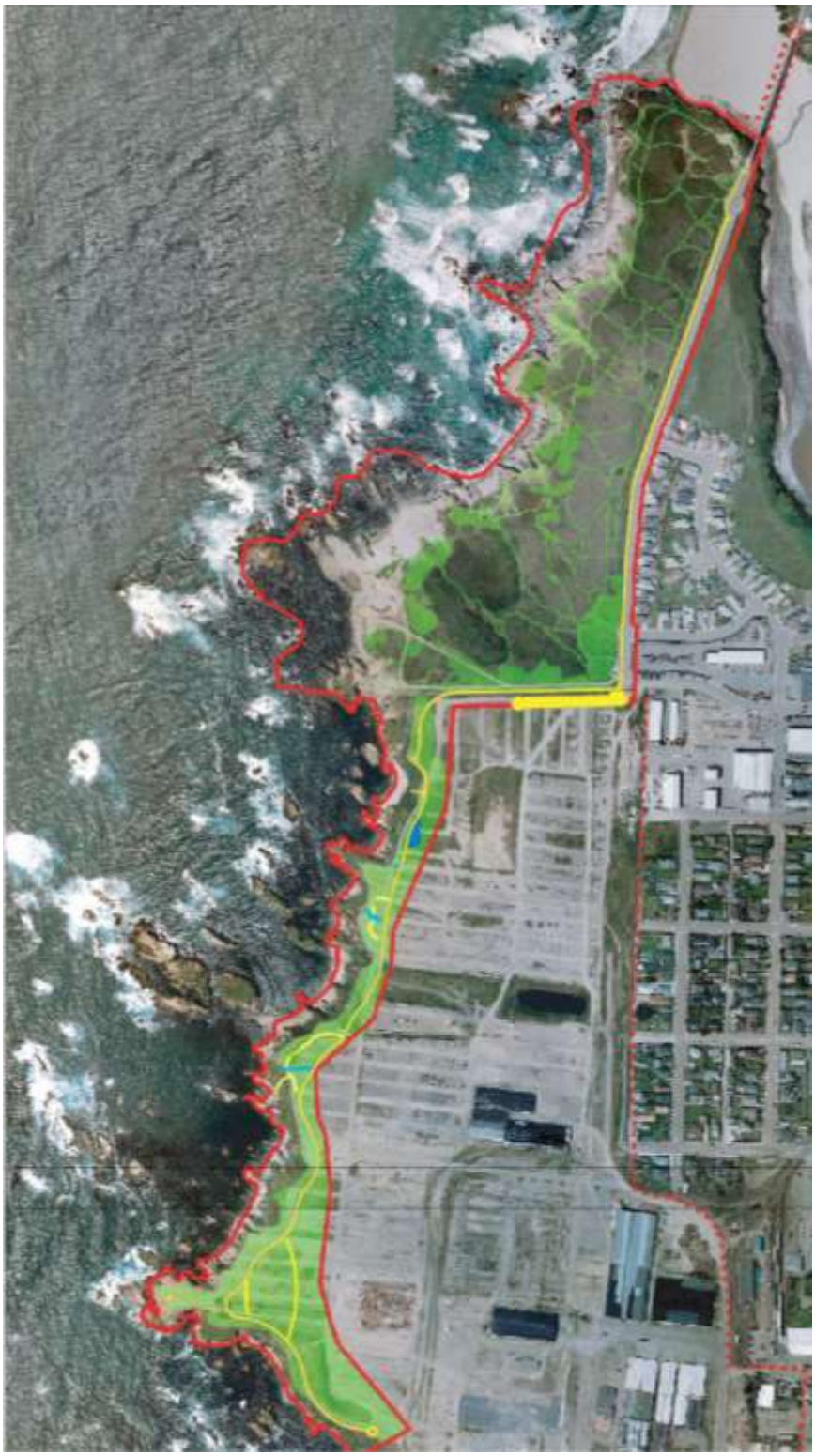


Figure 3- South Parkland Project Site Map

Proposed Project

The project has four components, each with individual characteristics. They include: 1) Glass Beach Drive, 2) Elm Street access road, multi-use trail and parking area, 3) the North Mill Site Parkland, and 4) the South Mill Site Parkland parcel. The proposed project is summarized by component below and shown in Figure ES-2. Proposed changes to the project are in italics for ease of review.

Glass Beach Drive Right-of-Way

This component would extend from the Pudding Creek Trestle Bridge south to the Elm Street Extension (refer to Figure ES-2). To allow for trail development, the Glass Beach Drive component would be constructed on both City's ROW along Glass Beach Drive and an area of 10 to 15 ft. east of the City's ROW on the Glass Beach Headlands would be utilized temporarily during construction. Stormwater improvements (a culvert with tree boxes) would also be necessary to provide sufficient space for the construction of a trail in an area currently occupied by a drainage ditch.

Elm Street Extension and Welcome Area

This component of the project would extend from the corner of Glass Beach Drive and Elm Street west on the multi-use trail located on State Parks property and to the proposed new multi-use trail on the Mill Site. Elm Street would be extended by approximately 50 ft. to the west onto the City's North Parkland parcel. The road would be 24 ft. wide and would terminate at a new 36-space linear parking area, which would also include a welcome plaza, bicycle parking, a restroom/maintenance building, and welcome kiosk. This component of the project also includes the extension of the multiuse trail along the southern edge of State Park's Glass Beach Parcel from east to west.

North Parkland

Restoration of the North Parkland would encompass approximately 20 ac between the bluff edge and the City's property line. Restoration efforts would focus on creating locally appropriate native habitats and include the installation of a restoration and cultural resources cap of approximately *12,000 cubic yards* of a mix of sand, soil and composted materials.

The North Parkland multi-use trail would consist of a primary trail of approximately 3,455 linear ft., and secondary trails including two short viewing loops, a "short cut" on the southern portion of the trail, and a short boardwalk. These secondary trails comprise approximately 1,750 linear ft. The primary trail extends from the parking area south to a turnaround bulb overlooking Soldier Bay and Soldier Beach. The primary trail on the North Parkland would be 8 ft. wide and include a 4-ft wide gravel shoulder on its western edge. The secondary trails would be 5 ft. wide and for pedestrian use only. This component would also include the installation of eight benches and ten interpretive signs along the trail and in the parking area.

The North Parkland is currently almost entirely surfaced with pavement or packed gravel. There are three existing small existing culverts that drain portions of the Mill Site in the project area, but much of the stormwater sheet flows over the impervious surfaces and to the bluff edge, where it is intercepted by a set of existing small berms (6 in to 1 ft. in height), which direct and concentrate stormwater runoff to various locations along the bluff edge. The proposed stormwater management improvements to the North Parkland would include:

1. Removal of the existing berms.

2. Construction of new three-foot high earthen berms with geotextile fabrics and planted vegetation to the east of the Coastal Trail in order to capture and direct the significant stormwater flows from the mill site into the proposed project detention basins and culverts (see L-9 through L-11)

3. Development of two bioswells and a detention basin near Otsuchi Point have been proposed to collect and temporarily detain stormwater which would outfall through a new culvert to the Pacific Ocean. These detention basins would accommodate a significant volume of stormwater from the paved portions of the Mill Site area (see L-9).

4. Stormwater would be collected at two small existing detention basins and outfall through two existing culverts which will be up-sized as part of the project into the Pacific Ocean.

5. Additionally two above ground stormwater conveyance bioswells will be constructed on the project site to transport stormwater from the mill site to the bottom of the bluff. They would be constructed with a clay lining within two 2-feet high berms, and through an above grade culvert over the bluff edge to the base-rock below.

South Parkland

Restoration of the South Parkland would encompass approximately 5 ac on either end of the runway and the area of City property between Highway 1 and the sailors' cemetery. Restoration efforts would focus on creating locally appropriate native habitats.

The trail network would consist of a multi-use primary trail of approximately 6,100 linear ft. It would be 8 ft. wide with a 4-ft wide gravel shoulder on the westside. The primary trail extends the length of the property from Noyo Point Road with a turnaround bulb at the terminus near the City's wastewater treatment facility. A series of 5-ft wide pedestrian only trail connections of 5,900 ft. would also be constructed. *The existing dirt road through the Soldier Point area is proposed to provide pedestrian access. This existing dirt road will be bound on both sides by symbolic fencing to keep people from treading on special status plants in this area. No new surfacing is proposed for this area.* The trail system also includes the installation of eight benches and seven interpretive signs.

Vehicular access to the South Parkland area would extend west from the Cypress Street gate along an existing unnamed dirt road that would terminate in a 63-space double-loaded asphalt surface parking area at the southern end of the abandoned runway.

The boundary between the parkland parcel and Noyo Point Road would include construction of a six foot high concrete wall to minimize impacts to residents of Noyo Point Road.

Access to the Noyo headland Preserve would be extended to Native Americans for cultural purposes and to scientists for scientific study only.

ATTACHMENT B

- **NOP & Initial Study Checklist**

CEQA Environmental Checklist

This checklist identifies physical, biological, social and economic factors that might be affected by the proposed project. In some cases, background studies performed in connection with the projects indicate no impacts. A NO IMPACT answer in the last column reflects this determination or that the condition described is not applicable. Where there is a need for clarifying discussion, the discussion is included following the issue area checklist.

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

The project site is composed of a portion of a former lumber mill (Mill Site), a portion of the Glass Beach Headlands and a portion of Glass Beach Drive ROW. The Northern portion of Mill Site has been graded nearly flat and is almost entirely paved. The southern portion is filled with 2 to 30 feet of imported fill materials and is vegetated with non-native plants. Some pavement or concrete has historically either eroded onto the bluff faces, or has been used to armor the bluffs. Significant vegetation on the Mill Site is limited to the bluff face, the bluff top and areas where seeps or drainage exist over the bluff edges. The Glass Beach Headlands includes significant vegetation and both native and non-native habitats. It appears to be in a "natural" state.

Views to the west from the Mill Site are scenic and include the Pacific Ocean, beaches, monuments and coastal bluffs. Views to the east from the Mill Site are dominated by improvements associated with the Mill Site including warehouses, and infrastructure improvements. Beyond the Mill Site, the views are dominated by the urbanized City of Fort Bragg and the scenic coast ranges beyond. The Glass Beach Headlands are visible from the open space to the north, from the Mill Site, the Pudding Creek Trestle Bridge, and Glass Beach Drive. Views from the Glass Beach Headlands are particularly scenic in nearly all directions and reflective of the "rugged California coast", however views to the south are dominated by the improvements associated with the Mill Site, including pavement and warehouses. Both sites are visible from the ocean, although they are relatively flat, so views to the east from the ocean would be dominated by the bluff edges and monuments, the urbanized City of Fort Bragg, and the coast ranges.

The proposed improvements are relatively limited, and given the industrial nature of the Mill Site, it is possible that the proposed project would have beneficial impacts to visual resources. However, the EIR will include an aesthetic resources section, which is expected to focus mostly on the Mill Site as that is where the majority of the physical improvements are proposed.

II. AGRICULTURE RESOURCES: In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	X
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	X
c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?	☐	☐	☐	X

The site is not in agricultural use, zoned for agricultural use. No important farmland is located onsite. No impacts to agricultural resources would result from the proposed project.

	☐	☐	☐	☐
III. AIR QUALITY: Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	X	☐
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐		X	☐
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non- attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	☐	X		☐
d) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	X	☐
e) Create objectionable odors affecting a substantial number of people?	☐	☐	☐	X

All of Mendocino County is non-attainment for the State PM-10 standard (particulate matter less than 10 microns in size). The primary manmade sources of PM-10 pollution in the area are wood combustion (woodstoves, fireplaces and outdoor burning), fugitive dust, automobile traffic and industry. The Mendocino County Air Quality Management District maintains full time monitoring equipment in Fort Bragg.

Project construction may contribute to this condition if fugitive dust is generated during construction. Construction activities include construction of the trail, parking areas, asphalt removal on 24 acres of the Mill Site and importation and placement of a soil cap onsite to protect cultural resources and provide a substrate for restoration. The soil/sand would come from the Noyo Harbor Dredge spoils site and the asphalt would be recycled and re-used onsite to the extent feasible. Hauling the soil cap to the site may result in unlikely to exceed local air quality standards if the material is covered while hauled and the roads are watered. No odors are anticipated, and the City would be responsible for complying with the naturally-occurring asbestos guidelines. The EIR will include an air quality section identifying potential impacts and recommending mitigation measures, as necessary.

IV. BIOLOGICAL RESOURCES: Would the project:

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

The project site supports native-dominated and disturbed coastal bluff habitats typical of the first coastal terrace, as well as adjacent bluff slopes and intertidal beaches. The flat terrace portions of the Mill Site have been paved or surfaced with gravel to the edge of the bluffs, but many native and non-native species have colonized these disturbed areas. Additionally there are areas on the south parcel that are composed of native plant populations (ESHAs). Due to this disturbance, the vegetation on the Mill Site portion of the project site is significantly different from the Glass Beach Headlands, with only remnant patches of coastal bluff communities located on small peninsulas.

Numerous biological resource studies have been prepared previously for the entire project site. These studies have been performed by Georgia-Pacific, the City of Fort Bragg, and State Parks. Numerous sensitive botanical and wildlife species, and habitats have been identified onsite. Because many of these reports have been prepared previously, the proposed project has been designed to avoid or minimize disturbance in these areas. However significant impacts may still result and mitigation will likely be required. The EIR will have an extensive biological resources section which synthesizes existing data and provides survey results from Spring 2013 as well.

V. CULTURAL RESOURCES: Would the project:

a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	☐	X	☐	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	X	☐	☐
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	X	☐
d) Disturb any human remains, including those interred outside of formal cemeteries?	☐	X	☐	☐

The entire project site has been previously inspected by professional archaeologists to the degree feasible given the paved and filled nature of a majority of the site. Previous investigations have identified significant cultural resources, including both prehistoric (Native American) and historic resources (lumber mill). The proposed project has been designed to avoid these resources to the extent feasible through alteration of the trail alignments, installation of a soil cap over known resources, and minimizing excavation; however it appears that resources may still be disturbed and that mitigation, including monitoring and recovery will be necessary.

The EIR will include a substantial cultural resources section. In addition, a treatment plan, which describes how cultural resources will be handled during construction activities, will be prepared prior to finalizing the EIR.

VI. GEOLOGY AND SOILS: Would the project:

a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:	☐	X	☐	☐
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42?	☐	☐	☐	X
ii) Strong seismic ground shaking?	☐	☐	X	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	X	☐
iv) Landslides?	☐	☐	X	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	X	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	X	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	☐	☐	X	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	X	☐

The project site is located on a coastal bluff. In most cases it appears that bedrock is relatively close to the surface. According to the City's Safety Element no active faults or known slides are located on the project site. The site could be subject to significant seismic shaking as the San Andreas fault is located approximately nine miles to the west.

Project improvements would include construction of an access road, new multi-use trails, and vertical access to the beach in at least one point. Excavations for these improvements are expected to be minimal. Typical engineering and construction techniques, consistent with the Uniform Building Code (UBC) would most likely be sufficient to avoid or minimize most geologic impacts.

The most significant impacts associated with the project are the potential for the project improvements and trail users to be affected by bluff retreat. A bluff retreat study has been prepared by the City. The EIR/EA will include a geology and soils section which will assess the potential of the proposed project to be affected by bluff retreat.

VII. HAZARDS AND HAZARDOUS MATERIALS: Would the project:

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	X	☐

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

The project site is not in close proximity to an airport. The proposed project would not include emitting or transporting hazardous materials.

No potentially hazardous materials exist on the site. The site was remediated under a clean-up order from DTSC and the receiving a letter certifying that the site has achieved clean up levels appropriate for reuse for passive recreation and habitat in 2010. No hazards impacts would result from the proposed project. The project will have to comply with a Soil Management Plan as mandated by DTSC.

VIII. HYDROLOGY AND WATER QUALITY: Would the project:

a) Violate any water quality standards or waste discharge requirements?	☐	X	☐	☐
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	☐	☐	☐	X
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	☐	X	☐	☐
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	☐		X	☐

e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐		X	☐
f) Otherwise substantially degrade water quality?	☐	☐	X	☐
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☐	X
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	☐	☐	☐	X
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☐	X
j) Be subject to inundation by seiche, tsunami, or mudflow?	☐	☐		X

The North Parkland parcel has been scraped flat in the past, and the majority of the site is impervious, although there are some patches of soil existing. Stormwater flows in sheets across the Mill Site. However the sheet flow is interrupted at the bluff edge by a series of one and two foot berms which channel the stormwater to breaks in the berms, where stormwater flow has resulted in significant erosion and undercutting of the coastal bluffs. The proposed project would alter stormwater and drainage patterns through construction of the improvements, and as a result of the proposed approximately 24-acre restoration area on the North Parkland parcel. The proposed project includes construction of vegetated detention basins and new outfalls. The proposed project does utilize existing culverts and outfalls to the extent feasible, although new "soft" above ground "culverts and outfalls which use revetments and vegetated swales have been proposed as well.

Drainage patterns on the South Parkland parcel differ significantly between the headlands west of the runway and the remainder of the site. Drainage to the west of the runway appears typical for coastal bluffs. Water accumulates in a series of drainages and flows to the ocean. It appears that in some cases, small perched "basins" exist on the headlands that capture stormwater and allow it to infiltrate and in some cases create upland seasonal wetland areas. The remainder of the site was scraped flat and is a mix of impervious compacted soil, gravel and asphalt surfaces. The proposed project would alter stormwater and drainage patterns through construction of the improvements and as a result of the restoration of approximately 20 acres of compacted gravel and paved areas. The proposed project includes construction of vegetated detention basins.

The proposed project would include the removal of 24 acres of paved surface on the Mill Site and restoration of that area with placement of new topsoil and vegetation. These construction activities have the potential to introduce sediment to the drainage system. The EIR will include a hydrology and water quality section which includes a peer review of the proposed drainage system and will identify potential erosion and sedimentation issues associated with construction and long-term operation of the new drainage system. It is anticipated that the proposed project may result in some beneficial impacts as the proposed project represents a more "natural" drainage system when compared to the existing conditions on the Mill Site.

IX. LAND USE AND PLANNING: Would the project:

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

c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☐	X

The proposed project would be located on the western edge of the City and improve non-motorized circulation in this area. It appears consistent with the City's Coastal General Plan and approved Local Coastal Program.

Potential project impacts on Environmentally Sensitive Habitat Areas (ESHAs), stormwater management, cultural resources, and conformance with the City's Coastal General Plan policies will be analyzed in the EIR as required by CEQA the Local Coastal Program and the Coastal Act.

No land use impacts would result from the proposed project. Relevant land use policies will be identified in the Environmental Setting of the EIR, and a preliminary determination regarding project consistency with those policies will be provided.

X. MINERAL RESOURCES: Would the project:

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	X
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	X

The proposed project would not result in the loss of known mineral resources nor conflict with existing or potential future mineral resource recovery or processing facilities. No impacts would result and no mitigation measures are required.

XI. NOISE: Would the project result in:

a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	X	☐
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	X	☐
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	X	☐
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	X	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	X	☐
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	X	☐

Ambient noise levels at the project site are relatively low and associated with limited automobile traffic or existing trail users. Land uses are generally recreational, although some residences exist on Glass Beach Drive. Noise generated by the proposed project would be related to paving or the removal of pavement, short-term and construction-related. Pavement removal activities would occur 1,000 feet or more from existing residences. Construction is not expected to include pile driving or use of explosives for demolition, activities which are most likely to exceed noise thresholds and result in intensive vibration. No long term noise impacts would result from the proposed project, and no mitigation measures are required.

XII. POPULATION AND HOUSING: Would the project:

a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	X
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	X
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	X

The proposed project would not induce growth, displace housing or require construction of new housing. No impacts would result and no mitigation measures are required.

XIII. PUBLIC SERVICES:

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:	☐	☐	☐	X
Fire protection?	☐	☐	☐	X
Police protection?	☐	☐	X	☐
Schools?	☐	☐	☐	X
Parks?	☐	☐	X	☐
Other public facilities?	☐	☐	☐	X

The proposed project would not require significant utility infrastructure, although wastewater and other utilities would be required at the proposed welcome center. These utilities would tie into existing utilities on Elm Street. Emergency access to the project site would be via existing paved and gravel roads and the paved areas of the Mill Site such as the runway and log decks.

The Draft Coastal Trail Master Plan identifies a number of safety measures that should be incorporated into the design to ensure the safety of trail users and minimize trespassing onto the remainder of the Mill Site which may not be open to the public at the time the proposed project is constructed. Because the trail may attract more visitors to the project site, emergency response requirements may be increased, although not significantly. No impacts to public services or facilities would result from the proposed project and no mitigation measures are required.

XIV. RECREATION:

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	X	☐
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	X	☐	☐

The proposed project is a recreational facility which would potentially have a physical impact on the environment. These potential impacts would be evaluated in the relevant section of the EIR/EA (i.e. biological resources, cultural resources).

XV. TRANSPORTATION/TRAFFIC: Would the project:

a) Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?	☐	☐	X	☐
b) Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?	☐	☐	X	☐
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☐	X
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	X
e) Result in inadequate emergency access?	☐	☐	☐	X
f) Result in inadequate parking capacity?	☐	☐	X	☐
g) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?	☐	☐	☐	X

The project would connect to existing bicycle facilities to the north (the Haul Road), additional trail facilities conceptually envisioned for the central portion of the Mill Site and to the south (Pomo Bluffs Park). Access to the North trail could be made by foot or bicycle via public roads or the Trestle Bridge, which connects hotels directly to the Glass Beach Headlands. Access to the South trail would be by foot or bicycle via Highway 1, Noyo Point Road and Cypress Street.

Automobiles could access the north facilities from existing public roads, including Glass Beach Drive and Elm Street, which connects to Highway 1 via a signalized intersection. Elm Street would also eventually connect to the proposed circulation system for the remainder of the Mill Site. Automobiles could access the south facilities from Highway 1 and Cypress Street (a signalized intersection).

On the northern edge of the proposed project the existing dirt parking lot at the corner of Elm and Glass Beach Drive would be removed and a new 41-spot parking lot would be constructed on the east and north edge of the North Parkland parcel. The proposed project also includes construction of a new parking lot on the south end of the runway. Overall, the number of available parking spaces would increase by approximately 60 spaces. Some impacts to transportation or circulation could result from the proposed project and mitigation measures may be required.

XVI. UTILITIES AND SERVICE SYSTEMS: Would the project:

a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☐	X
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☐	X
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	X	☐	☐
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	X	☐

e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	X	☐
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	X	☐
g) Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	X	☐

The proposed project would include three permanent restrooms. Two of these facilities are proposed to utilize ultra-low flow toilets and water-conserving sinks. The third would be a pit type toilet. Water consumption and wastewater production would be insignificant when compared to the existing demands within the City. No impacts would result from the proposed project and no mitigation measures are required. Water quality issues related to storm water facilities would be considered in the hydrology and water quality section of the EIR.

XVII. MANDATORY FINDINGS OF SIGNIFICANCE

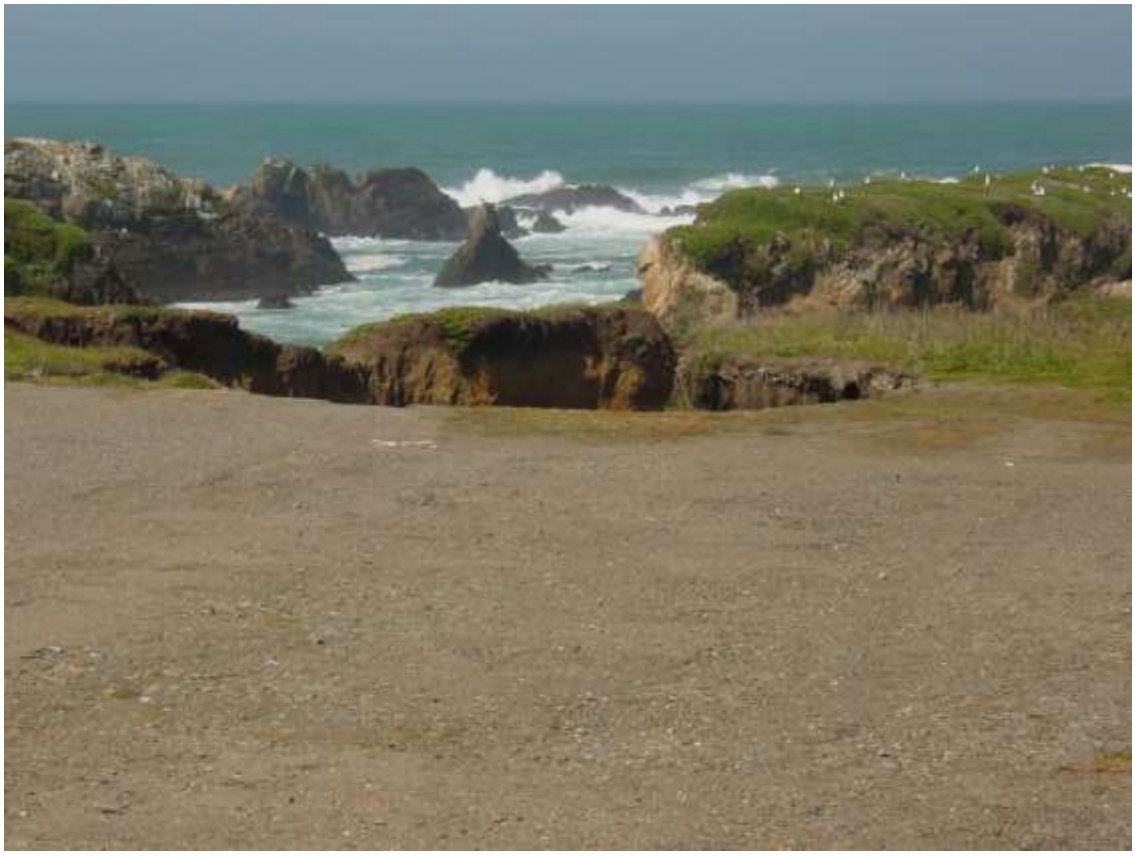
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	X	☐	☐
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	X	☐	☐
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	X	☐	☐

Appendix C –Soil Management Plan

Fort Bragg Coastal Trail
Soil Management Plan

January 2012

Prepared for DTSC

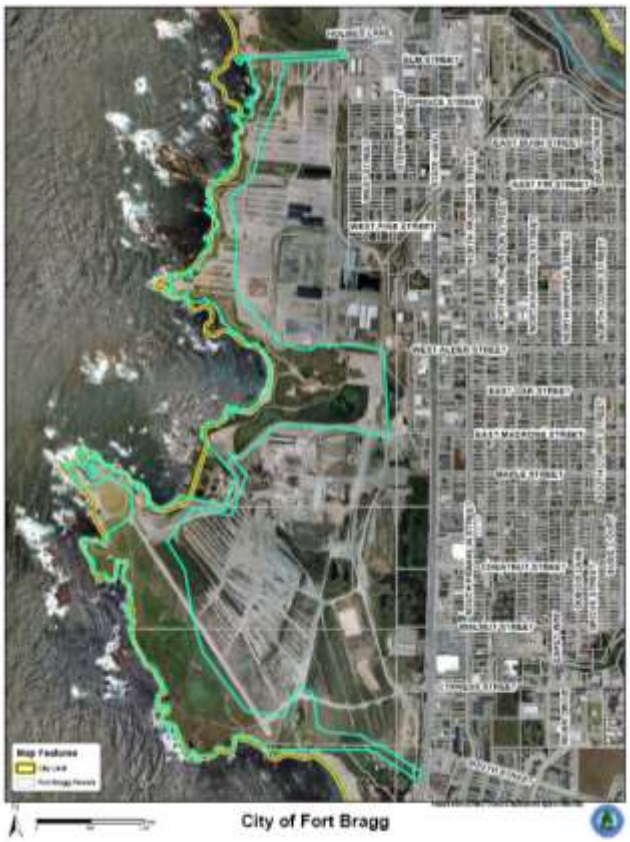


Prepared by:
Marie Jones
Community Development Director
City of Fort Bragg

Introduction

Purpose

The City of Fort Bragg (City) prepared this Soil Management Plan which describes the procedures to be followed during implementation of the Fort Bragg Coastal Trail and Restoration project at the City's 82 acre Coastal Trail property located between the Pacific Ocean and Noyo Point Road and Elm Street (see Figure).



Site Description

The Coastal Trail project site (aka Operable Unit A or OUA) includes 82 acres of bluff top on the former Georgia Pacific Mill Site. The site stretches along 3.5 miles of rocky bluff and is split into two different sites, (North and South). The north trail site was previously used for finished lumber storage and is generally flat with an average elevation of 40 feet and covered with compacted gravel and pavement. The south trail site was used previously for storage of soil and wood bark fill and is higher in elevation (70 feet), and is covered in native and non native vegetation with gently rolling topography.

Remediation Background

Georgia-Pacific Corporation ceased operations at the site in August 2002. A Remedial Investigation (RI) was completed for the site in 2008. A Remedial Action Plan (RAP) was prepared in 2008 and implemented for this site in 2009 under a cleanup order from the Department of Toxics and Substances Control (DTSC). The site was remediated to a level that ensures no adverse health impacts to passive recreational users, site wildlife, construction workers and utility/trench workers can occur. All of these potential receptors were analyzed for contaminants of concern.

The Remedial Investigation (RI) analyzed the following potential exposure pathways for construction and utility trench workers:

- Incidental soil ingestion,
- Dermal contact with soil,
- Inhalation of airborne soil particulates, and
- Inhalation of airborne VOC vapors.

Soils encountered by construction workers and utility/trench workers include surface soil within 2 feet bgs (below ground surface), as well as subsurface soil to a depth of 10 feet bgs.

A Risk Assessment was prepared for the project as part of the RI and determined that construction workers would have less than the DTSC agency threshold of one noncancer health effect for each of the receptors (recreation, construction worker and utility trench worker) under all scenarios.

Additionally the Risk Assessment determined that arsenic accounts for over 90% of the total cancer risk estimates on the Coastal Trail property. However, the arsenic levels on site are all well within ambient/background conditions. The cancer risk estimates on the coastal trail property for construction workers are all below CalEPA's threshold of 1 × 10-6 for carcinogenic effects, even with arsenic included. All risks for all receptors were below 1 × 10-6 once arsenic was excluded. Based on the assessment, upon remediation of the site under the RAP, the remaining site-related chemicals pose an acceptable risk to future receptors in OU-A, including construction and utility trench workers.

Coastal Trail Scope of Work

The scope of work in the Coastal Trail Restoration Project includes: 1) excavation of asphalt and compacted gravel throughout the site in support of site restoration activities; and 2) grading and trenching associated with installation of parking areas, restrooms, drainage facilities, and trail improvements.

Soil Management

This Soil Management Plan describes the protocol and procedures to be followed to protect human health and the environment during excavation, trenching and construction activities, and fulfills specific applicable requirements of the Department of Toxics and Substances Control (DTSC). Based on the site characterization data collected during the Remedial Investigation, and the soil cleanups that have been completed under the RAP, it is not anticipated that soil containing contaminants at hazardous levels will be encountered during future construction activities. However, soil containing contaminants that exceed regulatory levels for special handling, transportation, and disposal requirements may be encountered.

This Soil Management Plan provides the requirements for both hazardous and for non-hazardous and clean waste soil.

The site is covered in both clean and non-hazard soils, though some potential for hazardous soils does exist. Generally each of the soil types are defined as follows:

- **Clean Soil.** Clean soil is defined as soil which contains metals at concentrations within background levels and which is also not contaminated with hazardous organic compounds.
- **Non-Hazardous Soil.** Excavated soil with detectable levels of hazardous substances that are below applicable Federal and California hazardous waste standards are classified as non-hazardous materials.
- **Hazardous Soil.** Excavated soil with detectable levels of hazardous substances that are above applicable Federal and California hazardous waste standards are classified as hazardous materials.

Excavation and Construction Activities

Notice

All contractors will provide written notice to the DTSC of the intention to excavate a minimum of five days prior to initiation of field activities.
The written notice of excavation will include:

- Names and addresses of persons performing and responsible for the excavation work.
- Location of the site where excavation will occur.
- Scheduled starting date of the excavation. The starting date may be delayed up to five working days provided the DTSC is notified by telephone as early as possible prior to the new starting date.
- Quantity of soil to be excavated.
- Estimated average organic content of the excavated soil.
- Procedures to be employed to meet the requirements of this SMP.

The DTSC notice will be addressed to:

Tom Lanphar
DTSC
700 Heinz Ave., Ste 200
Berkeley, CA

Grading Permit

Prior to beginning any penetration action of ground or existing surfaces at the Fort Bragg Coastal Trail site (OUA), a Grading Permit must be obtained from the City of Fort Bragg.

Construction Activities

As the site has been remediation under the OUA RAP, levels of known soil contamination will be at concentrations that do not pose a risk to site workers, including construction or landscape maintenance workers. Therefore, Occupational Safety and Health Administration (OSHA) Hazardous Waste Operations and Emergency Response (HAZWOPER) training will not be required of construction workers whose activities disturb the soil. However, HAZWOPER training may be required if there is also potential for contact with contaminated groundwater.

Discovery of Potentially Contaminated Soils

Although project sites should be adequately characterized prior to construction, contaminated soil could be unexpectedly encountered during excavation. The Project Manager is required to notify the City of Fort Bragg and DTSC immediately when suspected contamination is discovered. Construction or other work in the affected area shall be stopped, and the area shall be cordoned off until an evaluation can be made.

Suspected contaminated soils may be identified on the site due to any or all of the following characteristics:

- Black or oily colors, and/or
- Soils which smell of hydrocarbors; and/or
- Soils with ash concentration; and/or
- Soils which are grey and dusty in character like ash.

If potentially contaminated soils are discovered, the City will implement a soil sampling plan per DTSC requirements to determine if there is contamination present and the extent of any contamination. DTSC will set forth requirements for movement or remediation of potentially hazardous soils based on the analytic results from the soil sampling.

Management of Broken Concrete and Excavated Soil

Excavated soil shall be managed in a way that will not cause sediment in storm water runoff. Soil stockpiles from the site will be covered with heavy duty plastic sheeting. Wherever possible, broken concrete and excavated soil will be stockpiled on areas with improved asphalt or concrete surface.

If potentially hazardous soils must be moved during the construction process, they will be stored in a specific area for Potentially Hazardous Soil. The location of the Potentially Hazardous Soil Storage Area will be designated by the City and will be contingent upon the nature and location of field activities. Stockpile covering will be in good condition, joined at the seams, and securely anchored to minimize headspace where vapors may accumulate. When not covered, soil stockpile surfaces will be kept visibly moist by water spray, as necessary.

Soil Disposal

Clean Soil

City of Fort Bragg has a strong commitment to waste minimization and pollution prevention to substantially reduce waste generation and increase recycling. This policy applies to all site operations, associated support operations, and site contractors who generate any type of waste, including solid (office trash, construction and maintenance debris), hazardous, and mixed waste. To support this policy, clean excavated soil will be reused onsite (such as for fill or other construction purposes), to the extent practicable.

If on-site reuse is not practical or cost effective, clean waste soil will be disposed of in a Class III or other acceptable landfill. The landfill may require specific analytical testing to document that chemical concentrations do not exceed their waste acceptance criteria.

Concrete and Asphalt Debris

Non-hazardous concrete and asphalt debris will be reused on site where possible or transported to Baxman Gravel in Fort Bragg or Norcal Rock in Willits, California for disposal or recycling.

Non-Hazardous Soil

Non-hazardous contaminated soil will be disposed of in a Class II or other acceptable landfill, depending on the acceptance criteria of the landfill. The anticipated landfill facilities for disposal of non-hazardous excavated soil are the Potrero Hills Landfill in Suisun City, California and Waste Management, Inc., Redwood Landfill in Novato, California. The landfill may require analytical testing of the soil to document that chemical concentrations do not exceed their waste acceptance criteria.

Potentially Hazardous Soil

Potentially Hazardous Soil, loaded into transport vehicles for offsite disposal, will be covered with continuous heavy duty plastic or other covering to minimize emissions to the atmosphere. The covering will be in good condition, joined at the seams, and securely anchored to minimize headspace where vapors may accumulate. The anticipated landfill facility for hazardous excavated soil is the Waste Management, Inc. Kettleman Landfill in Kettleman Hills, California.

General Site Safety Practices

- The site speed limit is 20 miles per hour (mph), 10 mph near excavation areas.
- Be aware of deer while driving across the site, especially at dawn and dusk.
- At least one copy of this SMP must be in a location at the site that is readily available to personnel, and all project personnel shall review the plan prior to starting work.
- Public access to proposed excavation areas shall be restricted by the installation of fencing, signage, and monitoring by field personnel. Shoreline areas below excavation areas atop coastal bluffs will be fenced and posted with signs restricting public access. Field personnel will be stationed at the shoreline to prevent public access. A 24-hour security detail will patrol the areas during non-work hours to further restrict public access.
- Obey all warning signs, tags, and barriers. Do not remove any warnings unless authorized to do so.
- Practice contamination avoidance. Avoid contact with surfaces suspected to be impacted by contaminants of interest, such as standing water, mud, or discolored soil.

Best Management Practices

Construction Best Management Practices (BMPs) are management practices, operating procedures, or schedules of activities to control, reduce, or prevent discharge of pollutants from construction activities. Excavation and soil and concrete debris handling activities will include the following BMPs:

General

- Material or products will be stored in manufacturer's original containers.
- Storage areas will be neat and orderly to facilitate inspection.
- Check all equipment for leaks and repair leaking equipment promptly.
- Perform major maintenance, repairs, and washing of equipment away from the excavation site.
- Designate a completely contained area away from storm drains for refueling and/or maintenance work that must be performed at the site.
- Clean up all spills and leaks using dry methods (absorbent materials/rags).
- Dry sweep dirt from paved surfaces for general cleanup.
- Train employees in using these BMPs.

Concrete Breakout

- Avoid creating excess dust when breaking concrete. Prevent dust from entering waterways.
- Protect storm drains using earth dikes, straw bales, sand bags, absorbent socks, or other controls to divert or trap and filter runoff.

- Shovel or vacuum saw-cut slurry and remove from the site.

Excavation

- Schedule excavation work for dry weather periods when possible.
- Protect storm drains using earth dikes, straw bales, sand bags, absorbent socks, or other controls to divert or trap and filter runoff.
- Avoid over-application by water trucks for dust control.
- Protect stockpiles and other construction materials from rainfall with temporary roofs or heavy duty plastic and berms.
- Parking areas, staging areas, and traffic pathways on the site shall be cleaned as necessary to control dust emissions. Adjacent public streets shall also be cleaned if necessary when soil material from the site is visible.
- Excavation activities will be suspended when winds (instantaneous gusts) exceed 25 miles per hour.

Backfill Soil

Backfill materials will be obtained from a local borrow source, such as the Noyo Dredge Spoils Site of Baxman Gravel Company, Inc. in Fort Bragg, for use at the site. Coarse grained soils with a minor amount of fines to bind the soil are preferred for use as backfill as they are easier to compact and will allow water to more readily drain into surrounding soils. Specifically the City is likely to use Dredge Sands from The Noyo Harbor for the restoration and cultural resources cap for the site. The City will require approval from the Regional Water Quality Control Board in order to use these materials on the Coastal Trail. An extensive battery of tests will be completed by an analytic company and the results of the test will be considered by the RWQCB in their decision. In the past, dredge materials have had lower contamination levels, for all constituents, than the current clean-up levels for the Coastal Trail property and the RWQCB has approved theme for beneficial re-use on the site.