

CALIFORNIA COASTAL COMMISSION

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W11a

1-23-0136

(Sequoia Forest Products LLC)

August 9, 2023

EXHIBITS

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PROJECT	Repair OWTS Evaluation
CLIENT	Sequoia Forest Products
LOCATION	Brainard Mill Site, Eureka, CA
Location Map	

BY	GLM
DATE	3/24/23
CHECK	
SCALE	1" = 2000'

FIGURE	1
10255.01	

REUSE OF DOCUMENTS: This document and the ideas and designs incorporated herein, as an instrument of professional service is the property of LACO Associates and shall not be reused in whole or part for any other project without LACO Associates' express written authorization



Project Location

Exhibit 1- Vicinity Map
CDP 1-23-0136
Sequoia Forest Products LLC

MEMORANDUM

Administrative Coastal Development Permit Request
5151 State Highway 101, Eureka, California
Sequoia Forest Products LLC

Date: May 8, 2023
Project No.: 10255.01
Prepared For: California Coastal Commission
Prepared By: Megan Marruffo, Senior Planner
Reviewed By: Meghan Ryan, Planning Director
Cc: Peter Stroble, Sequoia Forest Products LLC

Handwritten signatures of Megan Marruffo and Meghan Ryan over horizontal lines.

Attachments: Figures: Figure 1: Demolition Site Plan
Figure 2: Septic Repair Site Plan
Appendix 1: Stormwater Pollution Prevention Plan (SWPPP)
Appendix 2: Soil and Groundwater Management Plan
Appendix 3: Emergency On-Site Wastewater Treatment Evaluation and Mound Design
Appendix 4: CDFW Site Visit Comments

1.0 INTRODUCTION

The purpose of this memorandum is to provide additional information on the proposed project proposed by Sequoia Forest Products LLC (Applicant) at the properties identified as Assessor's Parcel Numbers (APNs): 017-081-001 and 404-141-004, located at 5151 State Highway 101 within the city limits of Eureka, California (Site; Figure 1), in response to questions and comments received from the California Coastal Commission (Coastal Commission). The properties, collectively, are known as the "Brainard site" and are currently under the ownership of the California Redwood Company. The Site is located between Highway 101 to the west and Humboldt Bay to the east, within the City of Eureka. The Site has a land use and zoning designation of General Industrial (IG/MG, respectively) under the City of Eureka 2040 General Plan and City of Eureka Coastal Zoning Regulations (Chapter 156 of

Exhibit 2- Project Description, Demo Plan, and Septic Repair Site Plan
CDP 1-23-0136
Sequoia Forest Products LLC

jurisdiction of the Coastal Commission and was annexed into City jurisdiction from the County of Humboldt in 2018.

LACO, on behalf of the Applicant, submitted an application to the Coastal Commission on February 16, 2023, requesting a De Minimis Waiver. It is understood that, typically, any "development" occurring within the Coastal Zone requires a Coastal Development Permit (CDP) from the California Coastal Commission, unless it is found to be exempt. "Development" as defined in the Coastal Act (Section 30106) includes but is not limited to the following: construction, reconstruction, demolition, or alteration of the size of any structure, including any facility of any private, public, or municipal utility (where "structures" are further defined to include, but is not limited to, any building, road, pipe, flume, conduit, siphon, aqueduct, telephone line, and electrical power transmission and distribution line). Based on information received from the Coastal Commission since the submittal date, the Applicant and LACO understand that an Administrative CDP would be required for the project.

Additional information included in this memorandum includes the following:

- Additional detail regarding the proposed emergency septic system repairs;
- Discussion of potential directional drilling required for electrical system upgrades;
- Details regarding the planned re-routing of fire suppression water lines;
- Information pertaining to foundation work and ground disturbance associated with equipment installation;
- Discussion of potential interior building renovations; and
- Summary of the March 22, 2023, site visit with the California Department of Fish and Wildlife (CDFW).

2.0 PROJECT DESCRIPTION

The Applicant is proposing a state-of-the-art, ultra-high fiber recovery sawmill at the Site that would focus primarily on processing redwood logs into lumber products for the residential fence market, and would primarily utilize small, second growth logs from commercial forestry operations. The mill would utilize non-covered spaces for loading/unloading and staging finished goods and raw material inventory. All manufacturing equipment would be inside existing on-site buildings. Development requirements to accommodate this operation are minimal and will involve the following: structure demolition, electrical utility upgrades, and septic system repairs. The proposed use is principally permitted under the City of Eureka zoning regulations and would not require a Conditional Use Permit (CUP), although building and demolition permits would be required from the City for any interior and exterior modifications, including the proposed building demolition (further discussed below). An Onsite Wastewater Treatment System (OWTS) Repair Permit will also be obtained from the County of Humboldt Department of Environmental Health (DEH) for the proposed septic system repairs.

2.1 Existing Site Features

The Site is developed with approximately 401,000 square feet of building space and is almost entirely paved. A narrow strip of railroad grade owned by Northwestern Pacific Railroad Company (APN: 017-081-002 and a portion of APN: 404-141-003) borders the Brainard site to the south and east. The Site has been utilized for heavy industrial uses over several decades, as evidenced by historical aerial imagery. The Site continues to be used for industrial warehousing and manufacturing.

Although the Site is located within the city limits of Eureka, it is not served by community sewer and water services connections at this time. Domestic water is obtained from two (2) on-site wells located on the eastern parcel (APN: 404-141-004). One of the wells is located directly to the southeast of the administrative offices, which are located on the easternmost portion the Site; the other well is located directly east of the existing 500,000-gallon fire reservoir located on the southwestern portion of the eastern parcel and southeastern portion of the western parcel (APN: 017-081-001).

Wastewater infrastructure on the Site includes four (4) existing septic tanks and existing leaching lines. Two of the four existing septic tanks are located on the western portion of the Site, with the other two located on the eastern parcel of the Site. The City is actively pursuing grant funding in order to extend community sewer service to the Brainard site; however, the exact timing for completion of the extension project is unknown. Based on discussions with Humboldt County Department of Environmental Health (DEH), they approve of the continued use of an existing Onsite Wastewater Treatment System (OWTS) at the Site until community sewer service is available at the Site. However, repairs to one of the existing OWTS near the existing Planer Mill building (Building FF) is currently proposed to maintain its functionality.

Electrical power and natural gas at the Site are provided by Pacific Gas and Electric Company (PG&E). An existing power pole, transformer, and gas meter are located on the southeastern-most portion of the eastern parcel (APN: 404-141-004) near the existing administrative offices (Building JJ). A PG&E easement is located parallel to the existing railroad tracks running along the southern portion of the Site, on the northwest side of the railroad tracks.

The Site has two ingress/egress points that connect directly with U.S. Highway 101. The primary and active point is near the northeastern end of the Site. The secondary and inactive point is located approximately 2,600 feet southwest of the primary point; this access point would remain inactive under the project. Traffic exiting the northern driveway is controlled by a stop sign. The driveways contain an uncontrolled railroad crossing, although the railroad is not currently operational. The driveways cross a manmade inboard ditch that runs along the southeastern edge of the railroad grade. The Site also contains considerable paved areas and an internal road network.

Stormwater and drainage on-site are managed with an existing levee and inboard drainage system. The Site contains an existing Stormwater Pollution Prevention Plan (SWPPP), prepared by SHN Engineers and Geologists in June 2015, and revised in September 2016, September 2017, July 2018, and August 2022 (previously submitted). The 2015 SWPPP includes best management practices (BMPs) in addition to inspection and maintenance procedures. The SWPPP will be evaluated and revised accordingly for the proposed project as necessary, once the property purchase is completed. Electronic copies of the 2015 SWPPP and subsequent amendments are enclosed as Appendix 1.

2.2 Planned Operations

The proposed ultra-high fiber recovery sawmill would be located within Building FF, with administrative operations to occur within Building JJ. In addition, raw materials unloading and staging is proposed to occur within the area to the south of Building FF, where the majority of the buildings are slated for demolition. The finished project would be sold "green" (i.e., not dried). The areas on the north and west sides of Building FF would be utilized for storing packaged/unitized finished goods.

The Applicant plans to have no more than 50 full-time employees on-site during initial operations. Most employees would be located in Building FF, with a small number of administrative employees to be located in Building JJ. A second shift is planned in the future, which is anticipated to add an additional 40 employees. These changes are currently anticipated for 2028. Please note that inclusion of the second shift would not increase the total number of employees on-site at any given time beyond 50 employees, as the second shift would occur at a different time.

2.3 Site Improvements

The following subsections provide a brief overview of the proposed on-site improvements, which include demolition of existing buildings, electrical utility upgrades, OWTS repairs, re-routing of fire suppression water lines, and equipment installation.

The Applicant has indicated that Phase I and Phase II Environmental Site Assessments (ESAs) have been performed on-site, which concluded that environmental impacts due to previous Site uses are unlikely. Additionally, an asbestos assessment has also been completed, in addition to abatement of asbestos that did not require invasive deconstruction of building or parts of buildings. Please note that the Applicant is bound by a confidentiality clause with the Seller and is unable to release the reports at this time. Once the property purchase has been completed, the Applicant can share these reports with the Coastal Commission.

As described in the Soil and Groundwater Management Plan (SGMP) prepared by LACO on May 5, 2023 (Appendix 2), the prior uses at the Site utilized above-ground storage tanks for storage of various fields, and underground storage tanks (USTs) for storage of gasoline. An unauthorized release from the USTs resulted in an investigation and remediation overseen by DEH, which was closed in 1993. Soil and groundwater sampling since that time have been below Environmental Screening Levels. As noted in the SGMP, soil and groundwater encountered while conducting the work associated with the proposed project is not expected to be impacted with contaminants caused by previous Site uses. However, soil, groundwater, and debris related to the demolition of the existing septic system and water supply lines (discussed further below) should and would be stored on-site until disposed of in an appropriately licensed facility according to the recommendations contained in the SGMP.

In addition, the Applicant is eager to integrate the Humboldt Bay Trail with the Site so that employees can commute on foot or on bicycle. The Applicant started discussions with the Humboldt County Public Works Department about how to design this access, but do not yet have an actionable design. Once a plan is in place, the Applicant would submit a subsequent CDP application for that work. The Applicant also plans to provide the space to accommodate restroom facilities near the proposed trail when that project becomes reality.

The Applicant further understands that the Site is exposed to the threat of being impacted adversely by Sea Level Rise (SLR) and have reviewed recent SLR assessments commissioned by both the City of Eureka and the County of Humboldt. Based on information found in these reports, it is understood that it would likely be 30 or more years before SLR has a level of impact on the Site that would render it infeasible to conduct operations there, which is well beyond the timeframe required for this project to satisfy investors' return expectations. Nevertheless, the Applicant would be prepared to retreat from the property at such time that operating on it in full compliance with local, state, and federal environmental regulations becomes economically infeasible.

2.3.1 Building Demolition

As illustrated in the Site Plan (see Figure 1), the proposed improvements entail removal of sixteen (16) buildings totaling approximately more than half of the Site's current square footage (approximately 218,695 SF, or 55% of buildings). The buildings proposed for removal and to remain include the following, as listed on the Site Plan:

BUILDINGS TO BE DEMOLISHED		BUILDINGS TO REMAIN	
NAME	SQUARE FOOT	NAME	SQUARE FOOT
B	32,581	E AND F	5,990
G AND H	260	FF	171,181
I	260	JJ	260
K	25,150	A	208
CC	3,683	AA	38
W	374	BB	92
V	17,229	C	60
HH	18,705	D	868
U	64,814	EE	1,740
L	50,467	GG	297
O	783	II	123
P	1,255	M	495
N	962	S	146
Q	684	T	278
R	1,488	X	68
		Y	208
		Z	127
Total: 218,695 sf		Total: 182,179 sf	

Required on-site demolition would fall into two phases: hazardous waste removal and general demolition debris removal. Each phase is estimated at approximately six (6) months, for a total of twelve (12) months. Ideally, the Applicant plans to start demolition within three (3) months after appropriate permits are obtained.

The buildings proposed for demolition are currently in a declining state of maintenance and have been deemed an economic liability, are an aesthetic "eyesore", are not required for operations of the facility, and many pose logistical obstruction to efficient and safe flow of vehicles and materials. All building foundations are proposed to be left in place to minimize disturbance. In addition, BMPs would be employed during demolition to ensure all potential impacts are minimized (see Section 2.3.7, below).

Initial demolition debris is planned to be stored inside Buildings HH and U (also slated for demolition). Any stockpiling of demolition debris from these final buildings would be stored in the northwest annex section of Building FF.

2.3.2 Electrical Utility Upgrades

The Site is currently served with electrical power from PG&E. To support planned operations, electrical utility upgrades would be required. Currently, there is one (1) 2,500 KVA transformer on-site located just north of building GG; however, operations would require a total of 7,500 KVA, requiring installation of two (2) additional 2,500 KVA transformers. The proposed transformers would utilize directional boring to make the connection, the boring would occur near the southeastern corner of the planer building (Building FF), just north of Building GG. The boring length would be approximately 40 feet in length at a depth of 42 inches. The boring diameter would be less than 6 inches. Historical diagrams and photos of the Site provide evidence to support the Site contained considerably more electrical service than what is currently located on-site. The existing transformer is fed by an existing outside overhead line.

Exhibit 2- Project Description, Demo Plan, and Septic Repair Site Plan
CDP 1-23-0136
Sequoia Forest Products LLC



2.3.3 On-Site Wastewater Treatment System Repairs

Onsite Wastewater Treatment System (OWTS) repairs are proposed for the project. Representatives from LACO and DEH met on-site on February 14, 2023, to discuss options for repairing the Site's existing OWTS. The required repairs would be processed under an emergency repair permit with the County.

As provided in LACO's *Emergency On-Site Wastewater Treatment Evaluation and Mound Design* letter (OWTS Evaluation Letter), dated May 5, 2023 (see Appendix 3), two existing septic systems were evaluated, including: (1) an existing system for the office building and (2) an existing system for the planer mill building. Per the OWTS Evaluation Letter, the existing office OWTS is installed in the dike, northwest of the office septic tank (approximately 1,000 gallons). The Humboldt Bay trail is currently designed to cover the leach field and is likely to require that the leach field be abandoned. The planer mill OWTS includes an 800-gallon septic tank and leach field (although the number of leach lines could not be determined and their assumed location is currently paved).

Proposed OWTS improvements involve installation of a Wisconsin mound (185' L x 30' W x 3.5' H; 7,000 square feet of disturbance) within the area of the old planer mill leach field. The system has been sized to accommodate 110 people per day (two shifts of approximately 55 people) at 15 gallons per person per day, for a total daily maximum effluent flow of 1,650 gallons per day. The new system would require a new 5,000-gallon, dual-chambered concrete septic tank to be installed. As further described in the OWTS Evaluation Letter, DEH has requested the system be pretreated to minimize potential groundwater impact due to the high groundwater on-site. LACO recommends installation of two AdvanTex AX-RTUV Treatment Systems in parallel to treat the effluent from the septic tank, which would also reduce the nitrogen load to the mound.

Additionally, per the OWTS Evaluation Letter, the Wisconsin mound disposal field would require a pump system to distribute effluent to the mound. The pump system would convey effluent flow from the new 5,000-gallon septic tank through the AdvanTex treatment system into a proposed 1,000-gallon pump tank. The pump tank would house an effluent pump that would pump the effluent approximately 70 linear feet along a 2-inch supply line into the center manifold of the Wisconsin mound field. The office waste would be collected in the existing septic tank and transferred to a pump chamber, where it would be pumped to the new septic tank for the planer mill via a proposed 1,300-linear-foot septic line. The proposed improvements are shown in Figure 2. As per Figure 2, the proposed OWTS repair is anticipated to result in approximately 7,000 square feet of disturbed area for construction, with the new pump tank near the office building to result in approximately 100 square feet of disturbance and the proposed septic line to result in a disturbed area of approximately 1,300 square feet.

The OWTS Evaluation Letter further notes that "the roof drains must be tightlined around the back side of the mound to a drainage drop inlet structure to the west of the mound to minimize addition of noneffluent liquid into the system." In other words, the roof drains in the area of the proposed mound need to be collected and piped away from between the building and the mound to eliminate the additional water loading to the back of the mound and ensure water cannot pond behind the mound. Proposed improvements include filling the upper 12 inches creating a level area for placement of mound sand to accommodate the system. The area behind the mound (mostly comprised of weeds and grass) and an area approximately 10 feet beyond the mound footprint would be sloped to direct water away from the mound and the exposed soil would be covered by grass. No cut would occur and fill would be less than 50 cubic yards.

The proposed OWTS would accommodate the total number of employees anticipated on-site. The proposed Wisconsin Mound system is being approved as an emergency repair and would be in use until such time City services are connected to the Site. The City has provided a "Will-Serve" Letter.

2.3.4 Re-Routing of Fire Suppression Water Lines

There are two 8-inch fire suppression lines that serve the planer mill (Building FF) in the vicinity of the proposed mound system. These lines will be relocated by connecting two new lines to the existing main and routing them around the mound system, they will connect to the existing risers and check valves at the building. The existing line between the main and the risers will be cut and capped on either end and abandoned in place.

2.3.5 Equipment Installation and Foundations

As previously described, the proposed ultra-high fiber recovery sawmill would be located within Building FF, with administrative operations to occur within Building JJ. In addition, raw materials unloading and staging is proposed to occur within the area to the south of Building FF, where the majority of the buildings are slated for demolition.

Due to the ample amount of space available, the project would not "high deck" raw materials (as often seen at or near Schmidbauer Lumber in Eureka and at the Mad River Lumber log yard on West End Road in Arcata), and raw material "decks" planned under the project would be 20 feet in height or less. Raw material would be unloaded and transported onsite with standard raw material handling rolling stock equipment. Additionally, current plans entail using only the northern half of the property for the proposed operation, which comprises approximately 40 acres. The Applicant does not have any immediate or future planned use for the southern balance of the Site.

In addition, the operation would include some stationary raw material in-feed equipment used for conveying raw material into the sawmill installed on the pavement surface adjacent to the south end of Building FF. This equipment and foundation would occupy a footprint of roughly 2,496 square feet (52' L x 48' W x 18" D) and would be no more than 12 feet high.

There would be three standard residuals bins to collect sawdust, bark, and chips, and load into open-top trucks, proposed to be installed along the western exterior edge of Building FF. The bins would occupy a footprint of approximately 1,800 square feet (60'x30') and would stand approximately 50 feet high, below the height of immediately adjacent Building FF. Please note there is currently a large residual bin on-site, located adjacent to the southern edge of Building FF.

Installation of equipment would require foundation work and, therefore, some ground disturbance:

Raw Materials Infeed:

The internal support foundations would be 36 feet long, with one at 5-feet-wide wide and two at 4-feet-wide; both would be at a depth of 24 inches, with a total area of 468 square feet and 26 yards of excavated material. Between these footings a thin 6-inch slab that is 6 inches above grade would be added, resulting in no excavation. The area where the equipment extends into the sawmill (Building FF, 16' W x 48' L x 24" D) would require a new concrete slab. The approximate excavation would be 18 inches below existing grade, and the slab would be elevated 6 inches, requiring approximately 36 yards of removed material.

Chip and Sawdust Bins:

Beneath each bin would be a 200-square-foot concrete slab to support a truck drive path. The elevation would be 6 inches above existing grade and 12 inches deep, resulting in 6 inches of excavation. On each side of the truck drive path, there would be a thicker concrete foundation to support the bins. It would be approximately 2.5 feet deep, 6 inches above grade, resulting in an excavation that is 2 feet deep. The area per bin is approximately 170 square feet.

2.3.6 Building Renovations

Interior rooms are planned inside Building FF. The rooms may include a lunch/break room, a programmable logic control (PLC) room for housing computer infrastructure, and small office spaces for supervisors. A restroom remodel is also planned. These improvements would all be completely interior rooms that would require no additional foundation work or expansion of the building envelope.

No planning or design work for these interior improvements is prepared. Our understanding is that interior work of this nature does not require a CDP, but should that not be the case, the Applicant would apply for a separate CDP when plans are developed.

2.3.7 Proposed Best Management Practices (BMPs)

All demolition, OWTS improvements, and limited foundation work would be completed with appropriate BMPs implemented, including but not limited to the following:

- Given the age of the buildings proposed for demolition, presence of lead-based paint is assumed, and would be disposed of in accordance with all applicable regulations].
- The Seller had an asbestos assessment performed in 2022 on all buildings in question, and subsequently carried out an extensive project to abate all asbestos that did not require invasive deconstruction of building or parts of buildings. Consequently, the Applicant has been made aware of which buildings contain asbestos as well as precisely where asbestos is present in each building. The Applicant plans to utilize this information to remove asbestos surgically and dispose of it in accordance with prevailing law [including but not limited to U.S. Environmental Protection Agency (EPA; 40 CFR), U.S. Department of Transportation (DOT; 49 CFR), and Occupational Safety and Health Administration (OSHA; 29 CFR)].

Please note these assessments are the property of the Seller, and the Applicant's Purchase & Sale Agreement with the Seller prohibits the Applicant from including the report in the application at this time. Once the property purchase is completed (but prior to demolition), the Applicant would be able to share these reports.

- All work would occur on paved surfaces.
- Any stockpiling would occur within the empty buildings or should stockpiling be required outside, the materials would be properly contained and covered ahead of any precipitation.
- All debris would be promptly removed and properly disposed of at an off-site facility.
- Appropriate erosion control (e.g., silt fencing, silk sock(s), straw wattle(s), etc.) would be installed around the septic repair location to prevent any run-off into Humboldt Bay.
- The use of firehoses is proposed to wet down areas in order to reduce dust associated with demolition from leaving the Site.

Additionally, no ground soil would be disturbed during the building demolition. All building foundations are proposed to be left in place. However, should concrete piers or footings be encountered that are above the existing grade, they would be removed by way of cutting or jack hammering down to the surface of the existing grade without penetrating the surface. Should portions of the concrete foundations be degraded to a point that require removal entirely, concrete would only be removed to the bottom of the foundation's slabs or footings. Following demolition, any areas requiring repair to establish suitable drive paths for mobile equipment and motor vehicles would be repaired with ¾-minus rock (fill) and asphalt (surface).

With implementation of the respective BMPs and with ground disturbance limited only to the location of the septic system repairs, significant environmental impacts are not anticipated, including impacts to the immediately adjacent Humboldt Bay. All proposed measures described above would ensure there would be no runoff or contamination from hazardous materials, and all work would occur within previously disturbed areas. No on-site processing of the demolition debris would occur, further minimizing potential impacts. Concrete and steel would be transported to a recycling yard and other debris would be hauled to a landfill near Redding. Timber or large beams of wood that are cost-effective to recycle would be recycled in order to minimize waste to be transported to the landfill. Demolition debris would be loaded into haul trucks with an excavation, in as large of pieces that would fit in the gondola study trucks. It is estimated that between 160 and 200 truckloads of material would be removed from the Site.

Views would also not be impacted, but would actually be improved by removing dilapidated, obsolete structures and creating additional openings for views of Humboldt Bay to those passing by the Site on Highway 101. Additionally, as the property is privately-owned, there would be no impact to public access.

2.4 Coordination with California Department of Fish and Wildlife (CDFW)

Two (2) representatives of LACO met with CDFW on-site on March 22, 2023, in response to the Coastal Commission's March 9, 2023, inquiry as to whether the CDFW was consulted to confirm the presence or absence of sensitive species, including bats, which may utilize abandoned buildings for roost sites. During the site visit, existing buildings slated for demolition were inspected for the presence of bats. In written comments received from CDFW on March 22, 2023 (see Appendix 4), it was noted that strong evidence of bat use was not observed in any of the buildings visited during the site visit, and that the buildings do not "provide the kind of thermal insulation and protection from the elements that bats generally prefer, particularly for maternity colonies and overwintering sites." However, the remains of multiple swallow nests, in addition to several owl pellets and whitewash, were observed.

In order to avoid potential take of nesting birds, CDFW recommends that building demolition occur from September through February, outside of the bird nesting season (typically, mid-March through mid-August for most species). Should building demolition be requested during the bird nesting season, CDFW notes that the Applicant may have a qualified biologist conduct nest surveys and identify buildings without active nests. CDFW requests these surveys be conducted no more than seven (7) days prior to demolition and be re-done if there is a lapse in project activities of seven days or more.

The Applicant is agreeable to having nesting surveys completed for any demolition scheduled during the standard nesting period. Should any active nests be identified within any of the buildings slated for removal during the nesting season, the Applicant agrees to allow the nesting to be completed prior to building removal or until a qualified biologist determines the nest(s) are no longer active.

3.0 CONCLUSION

Thank you for your consideration and hope this memorandum provides sufficient information and justification to support an Administrative Coastal Development Permit from the Coastal Commission for the proposed project. Please do not hesitate to call us at (707) 443-5054 should you have any questions or require any additional information.

FIGURES

Figure 1

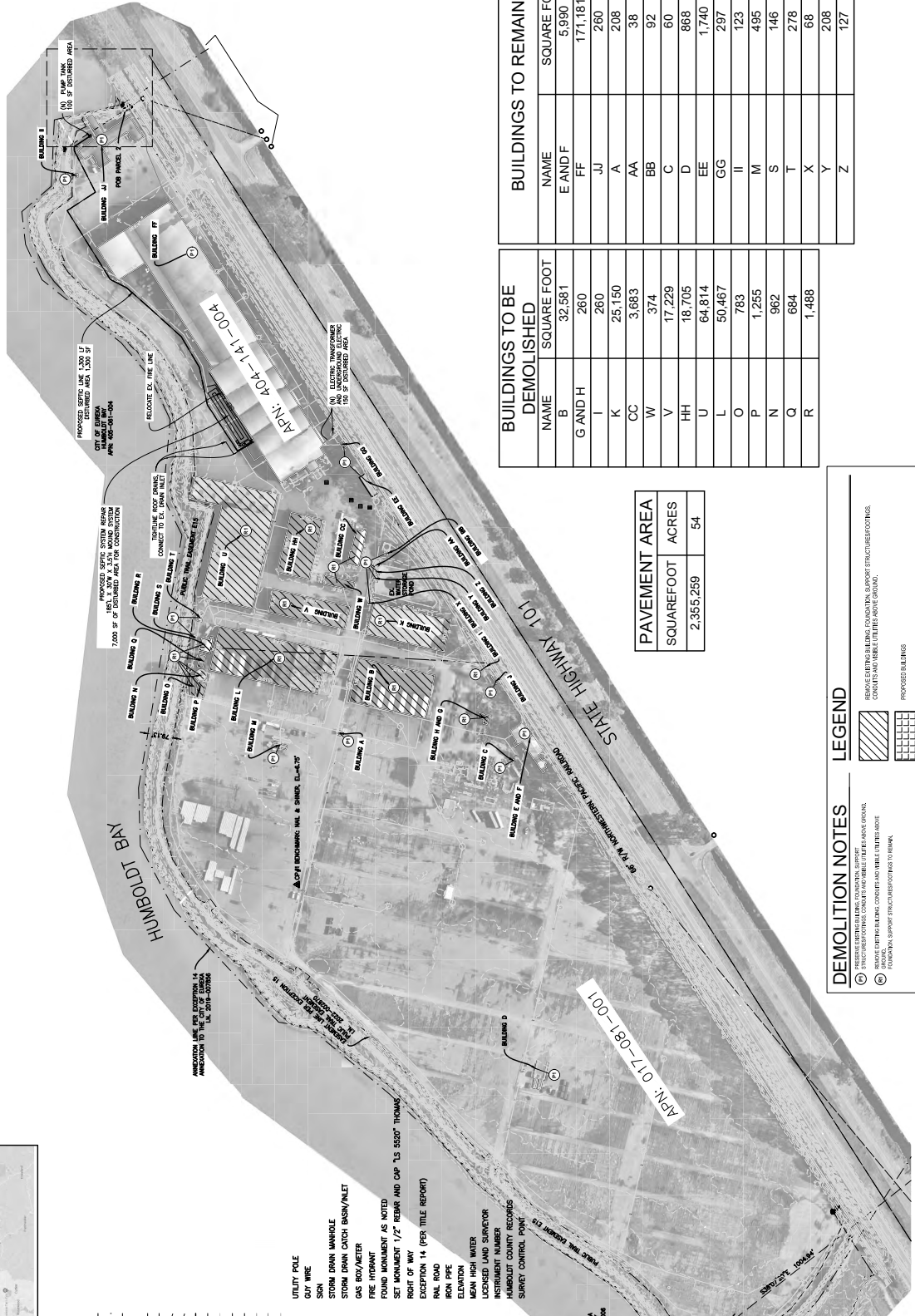
Demolition Site Plan

Figure 2

Septic Repair Site Plan

SEQUOIA FOREST PRODUCTS LLC DEMOLITION PROJECT

COASTAL COMMISSION DE MINIMIS WAIVER REQUEST
 5151 STATE HIGHWAY 101, EUREKA, CA 95501
 APNs: 017-081-001 and 404-141-004



- UTILITY POLE
- WIRE
- SOIL
- STORM DRAIN MANHOLE
- STORM DRAIN CATCH BASIN/INLET
- GAS BOX/METER
- FIRE HYDRANT
- FOUND MONUMENT AS NOTED
- SET MONUMENT 1/2" REBAR AND CAP 1.5' 500" THICK
- EXCEPTION 14 (PER TITLE REPORT)
- RIGHT OF WAY
- RAIL ROAD
- IRON PIPE
- ELEVATION
- MEAN HIGH WATER
- LICENCED LAND SURVEYOR
- INSTRUMENT NUMBER
- HUMBOLDT COUNTY RECORDS
- SURVEY CONTROL POINT

Exhibit 2- Project Description, Demo Plan, and Septic Repair Site Plan
 CDP 1-23-0136
 Sequoia Forest Products LLC

BUILDINGS TO BE DEMOLISHED		BUILDINGS TO REMAIN	
NAME	SQUARE FOOT	NAME	SQUARE FOOT
B	32,581	E AND F	5,990
G AND H	260	FF	171,181
I	260	JJ	260
K	25,150	A	208
CC	3,683	AA	38
W	374	BB	92
V	17,229	C	60
HH	18,705	D	868
U	64,814	EE	1,740
L	50,467	GG	297
O	763	II	123
P	1,265	M	495
N	962	S	146
Q	664	T	278
R	1,488	X	68
		Y	208
		Z	127

PAVEMENT AREA	
SQUARE FOOT	ACRES
2,355,259	54

DEMOLITION NOTES

- 1. REMOVE EXISTING BUILDING STRUCTURES AND REMOVE FOUNDATIONS.
- 2. REMOVE EXISTING BUILDING CONCRETE AND REBAR (SEE ABOVE).
- 3. DEMOLITION SUPPORT STRUCTURES MUST BE TO REMAIN.

LEGEND

- EXISTING BUILDING STRUCTURES AND FOUNDATIONS.
- EXISTING BUILDING CONCRETE AND REBAR (SEE ABOVE).
- DEMOLITION SUPPORT STRUCTURES TO REMAIN.



May 5, 2023

10255.01

Sequoia Forest Products
506 Second Avenue, Suite 2300
Seattle, Washington 98104

Attention: Peter Stroble

Subject: Soil and Groundwater Management Plan - Revised
Brainard Mill Site, 5151 Highway 101, Eureka, California

Dear Mr. Stroble:

Development plans for the above-referenced property (Site) primarily include renovation and demolition of existing structure where minimal ground disturbance is anticipated, and management of construction debris is described in other documents. This Soil and Groundwater Management Plan covers the planned re-routing of potable and fire suppression water supply lines, installing a new septic system, and adding lines to connect buildings currently served by two separate septic systems.

The Site has historically been the location of a sawmill and remanufacturing facility since first developed in at least the early 1950s. A teepee burner was in use through the early 1970s, and the facility used above-ground storage tanks for storage of various fuels, and underground storage tanks (USTs) for storage of gasoline. An unauthorized release from the USTs resulted in an investigation and remediation overseen by Humboldt County Division of Environmental Health, which was closed in 1993. Soil and groundwater sampling since then related to Phase I and II Environmental Site Assessments in 2014 and 2015 and planning work as part of a new trail system that incorporates the berm separating the Site from Humboldt Bay, have been below Environmental Screening Levels (SFRWQB 2019)

Phase I Environmental Site Assessments (ESA) were completed for the property in 2014 (SLR) and 2022 (LACO). The Site was also the subject of investigation and cleanup from a leaking underground fuel tank (LUST) in the late 1980s. The work was overseen by Humboldt County Division of Environmental Health, which closed the case in the early 1990s. The LUST was not in the vicinity of the proposed construction covered by this SGMP and is not anticipated to lead to impacted soil or groundwater in this area.

The two Phase I ESAs recommended limited Phase II ESA work based on the potential for previous site uses to lead to dioxin impacts to soil or groundwater. Soil sampling during SLR's Phase II (2015) included three soil shallow soil samples in the general area covered by this SGMP that were analyzed for chlorinated phenols, a precursor to dioxins generated by the conical burners that were used onsite. LACO's Phase II ESA looked only at soil near the location of the conical burners. Neither of these Phase II ESAs reported results that would indicate the presence of dioxins.

Because of these previous studies, in our opinion, the likelihood of encountering impacts to soil or groundwater in anything other than *de minimus* concentrations in the area covered under this SGMP is low. Therefore, this SGMP treats soil that will be encountered during construction activities as non-hazardous, with provisions included for the unlikely possibility of encountering soil or groundwater with visual or olfactory signs of impact.

1.0 SOIL AND GROUNDWATER MANAGEMENT

Soil and groundwater encountered while conducting the work outlined above are not expected to be impacted with contaminants caused by previous Site uses. However, soil, groundwater, and debris related to the demolition of the existing septic system and water supply lines should be stored onsite until disposed of in an appropriately licensed facility according to the recommendations below.

1.1 Pre-construction Requirements

The following actions should be taken prior to the start of construction activities, or any soil-disturbing activities:

- A ticket shall be submitted to Underground Service Alert North (Phone: 811, Web: usanorth811.org) at least 48 hours before commencing construction.
- Refer to LACO utility maps for utility conflicts in addition to those noted by USA (Figure 1).

1.2 Soil Management

If construction activities produce visible dust or sediment, dust control measures established by the North Coast Unified Air Quality Management District and the City of Eureka shall be applied. This includes water mist or spray and shall be at all times applied during activities that generate dust. Water should not be applied at a rate that saturates the soil and generates sediment runoff. Water mist shall also be applied to the road surface in areas where vehicle or equipment traffic is expected.

If soil or groundwater with detectable petroleum hydrocarbon odor or visible sheen are encountered, they shall be excavated and/or extracted to the extent practicable and segregated into stockpiles or DOT 55-gallon drums, labeled appropriately with the owner's name, contents, and date of first accumulation, and stored on Site until characterized according to Section 2.0. Stockpiles of soil with visible contamination should be placed on top of 10 mil plastic, with sheets lapped where necessary to prevent seepage of contaminants into underlying soil. Stockpiles should not exceed 1,000 cubic yards or a height of 20 feet. If these conditions are encountered, construction personnel should implement Level D personal protective equipment (PPE) as described below.

Soil without visible contamination should also be stockpiled until sampled for characterization if it will be disposed of offsite; however, it is not required that the stockpile to placed on top of plastic sheeting.

Stockpiles shall be protected with an appropriate perimeter control (i.e., fiber rolls). If a stockpile will not be used or disposed for 14 days or more, it should be covered with 10 mil plastic to prevent dust migration or discharge of sediment-laden stormwater. If drums are used to store soil, they shall be labeled appropriately and stored at the Site pending characterization before transport to a certified treatment or disposal facility.

1.3 Groundwater Management

Groundwater that accumulates during construction activities shall be pumped to the onsite water storage pond, which is used only for fire suppression. Groundwater is typically shallow at the Site and encountering groundwater should be expected during the planned construction.

2.0 PERSONAL PROTECTIVE EQUIPMENT

Level D protection, as defined by the Occupational Safety and Health Administration (OSHA) Hazardous Waste Operations and Emergency Response Standard (HAZWOPER) are set forth in Title 29, Code of Federal Regulations, Part 1910.120, will be observed on site should obviously impacted soil and/or groundwater as described in Sections 1.2 and 1.3 be encountered. All workers and visitors to the work area will be required to wear, at a minimum, a hard hat, eye protection, safety vest for visibility, and steel-toed rubber boots. At the discretion of the Site Safety Officer, additional PPE may be required.

PPE will be maintained by trained employees and will be inspected by the Site Safety Officer or other employees as directed by the Site Safety Officer.

Table 1: Level D PPE

Protection Level:	Modified Level D
Head:	Hard hat
Eye:	Safety glasses or goggles
Ear:	Earplugs or earmuffs as warranted
Hand:	Latex, cotton, or leather gloves as appropriate
Body:	Normal work clothes: long-sleeve shirts and long pants, plus high-visibility "traffic vests" when work is performed in (or near) streets, alleys, driveways, parking lots, or any other areas where vehicles may be encountered
Feet:	Steel-toed rubber boots

3.0 SOIL CHARACTERIZATION

Stockpiled soil that is intended for offsite disposal will be sampled for laboratory analysis in order to determine the appropriate disposal facility. Soil encountered during this project is anticipated to be classified as non-hazardous waste, defined as follows, and appropriate for disposal at a Class III landfill.

- Nonhazardous waste and non-Resource Conservation and Recovery Act (RCRA) hazardous waste are wastes that do not cause harm to human or environmental health. These wastes may or may not have specific disposal requirements. Based on analyses to date, we anticipate no more than de minimis concentrations of contaminants; therefore, they are appropriate for reuse onsite, but will require characterization for offsite disposal.

Stockpiles shall be sampled at the following interval, or as required by the disposal facility: one four-point composite sample, to be composited by the laboratory, per 250 cubic yards where the total volume of soil does not exceed 2,499 cubic yards. Samples shall be analyzed for:

- Volatile organic compounds (VOCs) by United States Environmental Protection Agency (EPA) Method 8260B.
- Semi-volatile organic compounds (SVOCs) and polycyclic aromatic hydrocarbons (PAHs) by EPA Method 8270C.
- Total petroleum hydrocarbons – diesel-range organics (TPH-DRO) by EPA Method 8015B
- Total petroleum hydrocarbons – oil-range organics (TPH-ORO) by EPA Method 8015B
- Total petroleum hydrocarbons – gasoline-range organics (TPH-GRO) by EPA Method 8015B
- California Title 22 metals – EPA Method 6010B/7470.
- Dioxins and Furans by EPA Method 1613B (note: only required if 8270 analyses result in detectable chlorinated phenols).

4.0 LIMITATIONS

LACO has exercised a standard of care equal to that generated for this industry to ensure that the information contained in this report is current and accurate. LACO disclaims any and all liability for any errors, omissions, or inaccuracies in the information and data presented in this report and/or any consequences arising therefrom, whether attributable to inadvertence or otherwise. LACO makes no representations or warranties of any kind including, but not limited to, any implied warranties with respect to the accuracy or interpretations of the data furnished. LACO assumes no responsibility of any third-party reliance on the data presented. Data generated for this report represents information gathered at that time and at the indicated locations. It should not be utilized by any third party to represent data for any other time or location. It is known that site and subsurface environmental conditions can change with time and under anthropologic influences. This report is valid solely for the purpose, site, and project described in this document. Any alteration, unauthorized distribution, or deviation from this description will invalidate this report.

5.0 REFERENCES

- LACO Associates. 2022. Phase I Environmental Site Assessment, 5151 State Highway 101, Eureka, California.
- LACO Associates. 2023. Letter Report of Findings, Limited Phase II Environmental Site Assessment, Brainard Mill Site, 5151 State Highway 101, Eureka, California.
- Occupational Safety and Health Administration (OSHA). Title 29, Code of Federal Regulations, Part 1910.120.
- San Francisco Bay Regional Water Quality Control Board. "Environmental Screening Levels 2019 Revision 2," Available by request: ESLs.ESLs@waterboards.ca.gov
- SLR International Corp. (SLR). 2014. Phase I Environmental Site Assessment. California Redwood Company. Brainard Mill, 5151 Highway 101 North, Eureka, California 95551.
- SLR International Corp. (SLR). 2015. Summary Report for Phase II Environmental Site Assessment. California Redwood Company. Brainard Mill, Eureka, California 95551.

Sincerely,
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CSM:hjc