RESOLUTION OF THE PLANNING COMMISSION
OF THE COUNTY OF HUMBOLDT
Resolution Number 17-35

Case Number CUP-13-013
Assessor's Parcel Numbers 205-351-023 and 205-351-030

Makes the required findings for certifying compliance with the California Environmental Quality Act and approves the Humboldt Redwood Company Conditional Use Permit.

WHEREAS, Humboldt Redwood Company submitted an application and evidence in support of approving a Conditional Use Permit to allow removal of nineteen historic industrial structures; and

WHEREAS, the County Planning and Building Department has reviewed the submitted application and evidence and has referred the application and evidence to involved reviewing agencies for site inspections, comments and recommendations; and

WHEREAS, the County is the lead agency and has prepared an Environmental Impact Report in accordance with the California Environmental Quality Act (CEQA) Guidelines; and

WHEREAS, in accordance with the requirements of the California Environmental Quality Act (CEQA), a formal Notice of Preparation (NOP) of an Environmental Impact Report (EIR) was issued on August 9, 2016 soliciting public input regarding the EIR. The NOP was sent by certified mail on August 9, 2016 to all the responsible and trustee agencies. The comment period ran from August 9, 2016 through September 8, 2016; and

WHEREAS, a Notice of Completion of the Draft Environmental Impact Report for the Humboldt Redwood Company Demolition project was filed with the State Clearinghouse on March 6, 2017 (State Clearinghouse No. 2016082033); and

WHEREAS, a Notice of Availability was published in accordance with Public Resources Code section 21092 and CEQA Guidelines section 15087 on March 6, 2017 and was sent by mail to organizations and individuals who requested such notice. The Notice of Availability provided for a public comment period commencing on March 6, 2017 and ending on April 19, 2017; and

WHEREAS, the Notice of Availability contained substantially all of the information required by Public Resources Code section 21092 and CEQA Guidelines section 15087 and was published in the manner required by law, and was consequently made in full accordance with CEQA, notwithstanding any minor errors, which were not prejudicial; and

WHEREAS, the Draft EIR describes the environmental impacts of the proposed project, and concludes the project will have significant and unavoidable cultural resource impacts; and

WHEREAS, the County solicited but received no public or agency comments on the draft document; and

WHEREAS, in accordance with CEQA, a Final Environmental Impact Report (Final EIR) was completed on May 8, 2017; and

WHEREAS, on July 13, 2017, the Humboldt County Planning Commission held a duly noticed public hearing to receive testimony on the adequacy on the Final EIR; and

WHEREAS, the Final EIR was reviewed and considered by the Planning Commission, consistent with the requirements of the California Environmental Quality Act (CEQA) prior to making its decision; and

WHEREAS, on July 13, 2017, after holding a public hearing, the Planning Commission voted to certify the Final EIR for the Humboldt Redwood Company and approve the Project, with a minor modification, adopt the Findings attached hereto as Exhibit A, adopt a Statement of Overriding Considerations attached hereto as Exhibit B, and approve the Mitigation Monitoring and Reporting Program attached hereto as Exhibit C; and

WHEREAS, Attachment 2 in the Planning Division staff report includes evidence in support of making all of the required findings for approving the proposed Conditional Use Permit (Case Number CUP-13-013).

NOW, THEREFORE, BE IT RESOLVED, that the Humboldt County Planning Commission hereby:

1. Certifies that the Final Environmental Impact Report has been completed in compliance with CEQA, the Final EIR was presented to the Planning Commission and that the Planning Commission reviewed and considered the information contained in the Final EIR prior to approving the project, and the Final EIR reflects the County's independent judgment and analysis;
2. Adopts the Findings attached hereto as Exhibit A;
3. Adopts the Statement of Overriding Consideration attached hereto as Exhibit B;
4. Adopts the findings with respect to General Plan and zoning consistency in Attachment 2 of the Planning Division staff report for Case Number CUP-13-013 based on the submitted evidence;
5. Adopts the Mitigation Monitoring and Reporting Program attached hereto as Exhibit C; and
6. Approves the Conditional Use Permit applied for as recommended and conditioned (i.e the Preferred Project Alternative with the updated mitigation measures) in Attachment 1 for Case Number CUP-13-013.

Adopted after review and consideration of all the evidence on July 13, 2017.

The motion was made by Commissioner Shepherd and seconded by Commissioner Mitchell.

AYES:	Commissioners Bongio, Shepherd, Morris and Mitchell
ABSENT:	Commissioners Edmonds, McKenny and Levy
DECISION:	Motion carries 4/0.

I, John Ford, Secretary to the Planning Commission of the County of Humboldt, do hereby certify the foregoing to be a true and correct record of the action taken on the above entitled matter by said Commission at a meeting held on the date noted above.

John Ford
Director, Planning and Building Department

EXHIBIT A - Statement of Findings

FINDINGS OF FACT IN SUPPORT OF THE FINAL ENVIRONMENTAL IMPACT REPORT FOR THE HUMBOLDT REDWOOD COMPANY SCOTIA OPERATIONS DEMOLITION PROJECT (CEQA GUIDELINES SECTION 15091(A)(3))

Introductory Findings

Independent Judgment/CEQA Compliance/Effect of Findings.

- The Draft and Final Environmental Impact Report and these Findings represent the independent judgment of the Humboldt County Planning Commission, and are hereby certified and found to comply with the procedural and substantive requirements of the California Environmental Quality Act (CEQA). The process by which the EIR was prepared and circulated (including the responses to comments), and by which this matter was brought to the Board for consideration and decision, likewise complies with the requirements of CEQA.
- The Planning Commission specifically finds that the thresholds of significance utilized throughout the Draft and Final EIR are appropriate, are supported by the evidence in the record, and adequately and accurately distinguish those adverse effects that are significant from those that are not significant.
- The Planning Commission recognizes that there may be differences in and among the different sources of information and opinions offered in the documents and testimony that make up the EIR and the administrative record; that experts disagree; and that the Planning Commission must base its decision and these Findings on the substantial evidence in the record that it finds most compelling. Therefore, by these Findings, the Planning Commission ratifies, clarifies, and/or makes insignificant modifications to the Draft and Final Environmental Impact Report and resolves that these findings shall control and are determinative of the significant impacts of the Project. Except where these Findings are more specific, the Planning Commission adopts the reasoning, analysis, and conclusion set forth in the Draft and Final Environmental Impact Report as its own.
- Without limiting the generality of the foregoing, the Planning Commission hereby specifically ratifies and adopts the Project Objectives set forth in the DEIR page 2.

Findings Associated with Potentially Significant Impacts and Significant Impacts

Cultural Resources

A) **Impact 2.5.1:** Substantial Adverse Change in the Significance of a Historic Resource. This impact is significant with mitigation.

Mitigation Measures:

Mitigation Measure CUL-1. Recordation. To ensure a permanent record of the properties' present appearance and context, proposed buildings and structures slated for demolition will be recorded according to Historic American Buildings Survey (HABS) and Historic American Engineering Record (HAER) standards prior to any deconstruction activities. The HABS/HAER documentation would be filed with the California State Office of Historic Preservation, Town of Scotia Company,

LLC, Humboldt State University, and other institutions or agencies. Recordation shall also include:

1) documenting industrial process;

2) documenting any extant machinery and equipment used; and

3) further researching the spatial arrangements, available machinery, and other details that reveal an internal machine's function. In addition, the mitigation may include general views and details of structural framing systems, including roof trusses, bents and beam systems, and pedestals that supported the building structure and the equipment and machinery.

Mitigation Measure CUL-2. Scotia Archives. Existing data and information, including photographs, will be organized and categorized in an archival system both physically located within the town of Scotia and digitally online.

Mitigation Measure CUL-3. Interpretive Display. HRC will develop a display of the photographs and documentation for public exhibition.

Mitigation Measure CUL-4. Opportunities for Salvage. After recordation and at least 30 days prior to demolition, HRC and its contractor will have an opportunity to salvage architectural elements for reuse, curation, and later sale. Items selected will be removed in a manner that minimizes damage.

Finding and Rationale:
Based on the analysis and information contained in the Draft and Final Environmental Impact Report and the administrative record, the Planning Commission finds that the foregoing impact is significant with mitigation incorporated. This impact is partially mitigated by the imposition of the Mitigation Measures listed above. However, this impact would still remain significant even with the associated mitigation measures and therefore, a Statement of Overriding Considerations is required.

Reference: DEIR pages 36-37.

B) **Impact 2.5.2:** Substantial Adverse Change in the Significance of an Archaeological Resource. This impact is less than significant with mitigation incorporated.

Mitigation Measure CUL-5. Inadvertent Discovery. If archaeological resources, such as, chipped or ground stone or bone, are discovered during ground-disturbance activities, work shall be stopped within 20 meters (66 feet) of the discovery, as required by CEQA (January 1999 Revised Guidelines, Title 14 California Code of Regulations [CCR] 15064.5 (f)). Work near the archaeological finds shall not resume until a professional archaeologist, who meets the Secretary of the Interior's Standards and Guidelines, has evaluated the material and offered recommendations for further action.

Finding and Rationale:
Based on the analysis and information contained in the Draft and Final Environmental Impact Report and the administrative record, the Planning

Commission finds that changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the foregoing potentially significant impact to a less than significant level.

Reference: DEIR pages 37-38.

C) **Impact 2.5.4:** Disturb any human remains, including those interred outside of formal cemeteries. This impact is less than significant with mitigation incorporated.

Mitigation Measure CUL-6. Human Remains. If human remains are discovered during project construction, work will stop at the discovery location, within 20 meters (66 feet), and any nearby area reasonably suspected to overlie human remains (Public Resources Code, Section 7050.5). The Humboldt County coroner will be contacted to determine if the cause of death must be investigated. If the coroner determines that the remains are of Native American origin, it will be necessary to comply with state laws relating to the disposition of Native American burials, which fall within the jurisdiction of the North American Heritage Commission (NAHC) (Public Resources Code, Section 5097). The coroner will contact the NAHC. The descendants, or most likely descendants, of the deceased will be contacted and work will not resume until they have made a recommendation to the landowner or the person responsible for the excavation work for means of treatment and disposition, with appropriate dignity, of the human remains and any associated grave goods, as provided in Public Resources Code, Section 5097.98. Work may resume if NAHC is unable to identify a descendant or the descendant failed to make a recommendation.

Finding and Rationale:
Based on the analysis and information contained in the Draft and Final Environmental Impact Report and the administrative record, the Planning Commission finds that changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the foregoing potentially significant impact to a less than significant level.

Reference: DEIR page 39.

Aesthetics

A) **Impact 2.6.1:** Create Substantial Adverse Effects on a Scenic Vista. This impact is considered significant and cannot be mitigated. A Statement of Overriding Considerations is required.

Mitigation Measures: None available.

Finding and Rationale:
Based on the analysis and information contained in the Draft and Final Environmental Impact Report and the administrative record, the Planning Commission finds that the impact to scenic vistas caused by removal of certain buildings pursuant to the project is significant and unavoidable, and that there are no available mitigation measures. A Statement of Overriding Considerations is required.

Reference: DEIR pages 39-41.

B) **Impact 2.6.2:** Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.

Mitigation Measures: None available.

Finding and Rationale:
Based on the analysis and information contained in the Draft and Final Environmental Impact Report and the administrative record, the Planning Commission finds that the impact to scenic vistas caused by removal of certain buildings pursuant to the project is significant and unavoidable, and that there are no available mitigation measures. A Statement of Overriding Considerations is required.

Reference: DEIR pages 42-43.

C) **Impact 2.6.3**: Substantially degrade the existing visual character or quality of the site and its surroundings.
Mitigation Measures: None available.

Finding and Rationale:
Based on the analysis and information contained in the Draft and Final Environmental Impact Report and the administrative record, the Planning Commission finds that the impact to scenic vistas caused by removal of certain buildings pursuant to the project is significant and unavoidable, and that there are no available mitigation measures. A Statement of Overriding Considerations is required.

Reference: DEIR pages 43-44.

D) **Impact 2.6.4:** Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

Mitigation Measure AES-1: Outdoor Lighting. During project implementation, outdoor lighting for safety and security may be strategically located on the sawmill and power complex sites as necessary to safely operate the system and protect the facility from trespass and vandalism. These lights will be fitted with shade features that direct the light downward thus eliminating offsite glare. In some cases these lights could be motion activated. These lights will not create a new source of substantial light or glare that could adversely affect day or nighttime views in the area.

Finding and Rationale:
Based on the analysis and information contained in the Draft and Final Environmental Impact Report and the administrative record, the Planning Commission finds that changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the foregoing potentially significant impact to a less than significant level.

Reference: DEIR page 44

Air Quality

A) **Impact 3.3.2:** Violates Any Air Quality Standard or Contributes Substantially to an Existing or Projected Air Quality Violation.

Mitigation Measure AIR-1. Fugitive Dust. To mitigate potential impacts to air quality during the project, the following mitigation measures should be applied:

Mitigation Measure AIR-1a. All active deconstruction areas shall be watered at a rate sufficient to keep soil moist and prevent formation of wind-blown dust.

Mitigation Measure AIR-1b. All trucks hauling reclaimable and non-reclaimable material, fill, and other loose materials shall be covered, or all trucks shall be required to maintain at least 2 feet of freeboard.

Mitigation Measure AIR-1c. All unpaved access roads, parking areas, and construction staging areas shall be paved, watered daily, or treated with non-toxic soil stabilizers during construction.

Mitigation Measure AIR-1d. All paved access roads, parking areas, and deconstruction staging areas shall be cleaned daily with water sweepers during construction.

Mitigation Measure AIR-1e. If visible soil is carried out onto adjacent streets, the area shall be washed with water or by a water sweeper truck.

Mitigation Measure AIR-1f. Hydroseeding or non-toxic soil stabilizers shall be applied to inactive construction areas (previously graded areas inactive for 10 days or more).

Mitigation Measure AIR-1g. Exposed stockpiles of dirt, sand, and similar material shall be enclosed, covered, watered daily, or treated with non-toxic soil binders.

Mitigation Measure AIR-1h. Traffic speeds on unpaved roads shall be limited to 10 miles per hour.

Mitigation Measure AIR-1i. Vegetation in disturbed areas shall be replanted as quickly as possible.

Mitigation Measure AIR-1j. Outdoor dust-producing activities shall be suspended when high winds create visible dust plumes in spite of control measures.

Finding and Rationale:
Based on the analysis and information contained in the Draft and Final Environmental Impact Report and the administrative record, the Planning Commission finds that changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the foregoing potentially significant impact to a less than significant level.

Reference: DEIR pages 65-69.

B) **Impact 3.3.3:** Results in 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 that Exceed Quantitative Thresholds for Ozone Precursors).

Mitigation Measures: See **Mitigation Measure AIR-1**.

Finding and Rationale:
Based on the analysis and information contained in the Draft and Final Environmental Impact Report and the administrative record, the Planning Commission finds that changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the foregoing potentially significant impact to a less than significant level.

Reference: DEIR pages 68-69.

Hazards and Hazardous Materials

A) **Impact 3.5.1:** Create a Significant Hazard Through The Routine Transport, Use, or Disposal of Hazardous Materials

Mitigation Measure HAZ-1. Soil and Groundwater Management Contingency Plan. To mitigate potential impacts regarding hazardous materials in the event that residual petroleum hydrocarbons in soil and/or groundwater are encountered during project implementation, all the recommendations of the *Soil and Groundwater Management Contingency Plan-Former PALCO Mill B, Scotia, California, Case No. 1NHU857* (SHN, February 2013) shall be implemented. It describes necessary actions to be taken prior to and during the implementation of subsurface work in the event that contaminated soil and/or groundwater is encountered. It includes appropriate actions to address worker training, waste characterization, handling, and proper disposal of contaminated soil and/or groundwater that may be encountered.

Finding and Rationale:
Based on the analysis and information contained in the Draft and Final Environmental Impact Report and the administrative record, the Planning Commission finds that changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the foregoing potentially significant impact to a less than significant level.

Reference: DEIR pages 80-81.

B) **Impact 3.5.2:** Creates A Significant Hazard Through Reasonably Foreseeable Upset and Accident Conditions Involving The Release of Hazardous Materials.

Mitigation Measures: See **Mitigation Measure HAZ-1**.

Finding and Rationale:
Based on the analysis and information contained in the Draft and Final Environmental Impact Report and the administrative record, the Planning Commission finds that changes or alterations have been required in, or

incorporated into, the Project which avoid or substantially lessen the foregoing potentially significant impact to a less than significant level.

Reference: DEIR page 82.

Biological Resources

A) **Impact 3.8.1:** Substantial Adverse Effect, Either Directly or Through Habitat Modifications, On Any Species Identified As A Candidate, Sensitive or Special Status Species.

Mitigation Measure BIO-1. Seasonal Restrictions. To avoid direct and indirect impacts to nesting barn swallows (*Hirundo rustica*), violet-green swallows (*Tachycineta thalassina*), Townsend's big-eared bats (*Corynorhinus townsendii*), and pallid bats (*Antrozous pallidus*) seasonal restrictions on building demolition activities will be applied to certain structures in which (or directly adjacent to which) the swallows and bats may nest.
September 16 and February 28:
- West Kiln/Sorter Crane Shed
- North Wing Loading Shed
- South Wing Loading Shed
- North Wing Dry Kilns
- South Wing Dry Kilns
- North Wing Cooling Sheds
- South Wing Cooling Sheds
- East Kiln/Sorter Crane Shed
- Conveyor and Tower
- Northern Monorail Tunnel

Demolition activities at the following structures will be limited to the period between
September 1 and February 28:
- Southern Monorail Tunnel #1
- Manufacturing Plant
- Factory Crane Shed
- Southern Monorail Tunnel #2
- Maintenance Storage
- Annex

Demolition activities at the following structures will be limited to the period between
August 16 and May 14:
- Dry Sorter Shed
- Machine Shop
- Millwright Building
- Steel Shed
- Pipe Insulation Building
- Steamfitters Building
- Water Treatment Plant
- Powerhouse
- Fuel Storage Building

No seasonal restriction is necessary at the following structures:
- Office
- Grinding Room
- Knife Hog
- Boiler Building

The seasonal restrictions on building demolition may be altered through further consultation with the CDFW if, for example, it can be demonstrated that no nest or roost is occupied after July 31, or if potential roosting habitat has been altered to the extent that it is no longer suitable. Seasonal restrictions shall only apply to building demolition and not to subsequent grading activities.

Mitigation Measure BIO-2. Bat Boxes. To provide alternate bat roosting habitat, HRC shall install a bat box or boxes in the Scotia sawmill and/or power plant vicinity, as near as possible to the demolition project area. The location of the structures will take into consideration other factors, such as, activity levels, noise, lights, and aspect. The structure(s) will be designed and installed with CDFW guidance and approval. The bat box or boxes will be monitored for use, and if necessary, relocated as appropriate.

Finding and Rationale:
Based on the analysis and information contained in the Draft and Final Environmental Impact Report and the administrative record, the Planning Commission finds that changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the foregoing potentially significant impact to a less than significant level.

Reference: DEIR pages 100-103.

B) **Impact 3.8.4:** 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.

Mitigation Measures: See **Mitigation Measures BIO-1 and BIO-2**, above.

Finding and Rationale:
Based on the analysis and information contained in the Draft and Final Environmental Impact Report and the administrative record, the Planning Commission finds that changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the foregoing potentially significant impact to a less than significant level.

Reference: DEIR pages 103-104.

OTHER IMPACTS ARE NOT SIGNIFICANT

Other potential impact subject areas are addressed in the EIR. The Planning Commission finds that other potential impacts, including those discussed in the EIR, do not have significant effects on the environment. No mitigation measures are required for these other considerations. This statement of findings incorporates the relevant sections of the EIR by reference as noted. These include the impact categories of: land use and planning

(Chapter 2, pages 8-13), population and housing (Chapter 2, pages 14-15, public services (Chapter 2, pages 15-17), utilities and service systems (Chapter 2, pages 18-24), transportation and traffic (Chapter 2, pages 45-49), soils and geological resources (Chapter 3, pages 50-54), hydrology and water resources (Chapter 3, pages 54-62), greenhouse gas emissions (Chapter 3, pages 70-77), minerals resources (Chapter 3, pages 83-85), noise (Chapter 3, pages 85-91), agriculture and forestry (Chapter 3, pages 103-109).

Findings Associated with Project Alternatives:

The Final EIR evaluates the potential environmental consequences of a range of alternatives, including the No Project Alternative, adaptive reuse, relocation of structures, stabilization in place, and a hybrid alternative of stabilization and relocation.

1. The **No Project Alternative** is discussed in the DEIR on pages 114 to 117. The No Project Alternative has the least environmental impact compared to the proposed project or Alternatives A, B, C, or D. Under the No Project alternative, the proposed deconstruction of up to 30 structures over a period of 9 to 12 months would not occur. In the majority of cases, the structures and buildings listed for deconstruction are designated as "contributing" to the overall historically significant status based on criteria for the National and California Historic Landmark Registers, Scotia Design Guidelines, and other pertinent documents. Currently, many of these structures and buildings are vacant, are not operable due to their obsolete status with respect to current technology and performance standards, and are no longer an activity employed by modern sawmill or power plant operations. Most of the structures are in poor structural condition and pose a potential safety concern. To support its increased production levels, the Scotia sawmill is in need of additional finished lumber staging and truck loading space. There is also a need for additional air yard space (lumber storage area for drying) and the area where the subject structures stand would yield good functional air yard space. The ERP cogeneration plant (recently purchased by HRC) is in need of space to store fuel (wood chips). The sawmill is too far away from the power plant to make use of the antiquated conveyor system, so the wood waste needs to be transported by truck from the mill to near the power plant. The No Project alternative of retaining in place the structures and buildings designated for deconstruction would limit the space available for staging and loading, as well as air yard and fuel storage space, adversely affecting the process and flow of modern sawmill and power plant operations. The majority of the structures would not provide HRC with any useful function for the ongoing mill or power plant operations and, under the "No Project Alternative," would remain and continue to be unused. Under this alternative none of the project objectives would be realized and the structures would continue to deteriorate over time.

   Finding and Rationale: Having received, reviewed, and considered the entire record, both written and oral, relating to the project's Draft and Final Environmental Impact Report, and having weighed the pros and cons, the Planning Commission hereby rejects the No Project Alternative and finds that specific economic, legal, social, technological, or other considerations make the No Project Alternative infeasible and undesirable for each of the following separate, independent, and severable reasons:
   - The No Project alternative would result in ongoing deterioration of many of the sawmill and power plant structures and buildings that are not in use, obsolete, and thus slated for demolition (removal by deconstruction).
   - Further deterioration of materials and structural conditions could pose increasing hazards to employees working in and around these areas. Additionally, threats from seismic activity could also increase the instability of many of these obsolete and

already decaying buildings and structures including collapse of roofing materials, internal piping and mechanical features, shattering of windows, etc. This condition is in direct conflict with the project objectives, specifically the primary objective, which is to "Eliminate the hazards to life and property associated with these structures."

- Furthermore, the No Project alternative conflicts with another objective, specifically to "Improve long-term economic viability of the mill and power plant operations by aligning structures and the flow of equipment and materials to the orientation of the existing production lines." Under this alternative, the third objective, "Salvage deconstruction materials to the extent feasible to offset costs and minimize environmental impacts" would not be relevant.

- According to the mill complex structural evaluation, under the No Project alternative, the structures listed below would continue to be functional until they begin to fall apart. To address this issue, the structural evaluation recommended that random support columns be cored to evaluate interior rotting, and that every two years a licensed engineer evaluate the structure for continued occupancy. Without repair, these structures will most likely not be suitable for occupancy for more than 10 years, and possibly less if significant interior rotting is found in the support columns:
  - Manufacturing Plant
  - East Kiln/Sorter Crane Shed
  - Office
  - Conveyor and Tower
  - Northern Monorail Tunnel
  - Southern Monorail Tunnel #1
  - Factory Crane Shed
  - Southern Monorail Tunnel #2
  - Grinding Room

- If no repair is made to the cyclones on top of the Manufacturing Plant then an area on the inside of the structure needs to be permanently cordoned off so when the next piece falls in, no one will be injured. Under the No Project alternative, the mill complex structural evaluation recommends that the structures listed below be considered for condemnation and that no facility personnel or public be allowed in the structure or within a fall zone of the structure:
  - West Kiln/Sorter Crane Shed
  - North Wing Loading Shed
  - South Wing Loading Shed
  - North Wing Dry Kilns
  - South Wing Dry Kilns
  - North Wing Cooling Sheds
  - South Wing Cooling Sheds
  - Dry Sorter Shed

- Similarly, many of the structures determined to be in poor structural condition at the power plant should be considered for condemnation and no public should be allowed in these structures or within the fall zone of these structures. Structures considered to be a public hazard included the following:
  - Millwright Building
  - Water Treatment Plant
  - Boiler Building • Fuel Storage Building

- Powerhouse Building

- Under the "No Project" Alternative, none of the project objectives would be realized and the structures would continue to deteriorate over time.

Reference: DEIR pages 115-117.

Alternatives to demolition, including rehabilitation or relocation of the contributing historic structures, were considered by the applicant but were found to be infeasible. An analysis of the buildings by a structural engineer (included in the EIR appendices) determined that the majority of the structures do not have adequate structural integrity to support rehabilitation and the costs of re-use is prohibited. Relocation of the structures would require dismantling and reassembly due to their poor structural condition.

2. **Alternative A** involved adaptive reuse of the Manufacturing Plant/Factory Crane Shed complex as a warehousing and shipping facility and adaptive reuse of the Machine Shop as either a machine and fabrication shop, or for continued use for storage (all are contributing structures). Under this alternative, the other 27 buildings and structures proposed for demolition would be demolished. The cost opinion found that retrofitting it for adaptive reuse would be far more expensive (over $6 million dollars more expensive) than implementing the proposed project due mostly to the cost difference between modifying the 187,000-sf Manufacturing Plant/Factory Crane Shed for adaptive reuse as a warehouse/shipping facility (cost estimated at $8,772,000-$12,125,000) vs. likely constructing a new, pre-engineered metal building of the necessary dimensions (only 100,000 square feet [sf]; cost estimated at $3,300,000-$4,100,000). Due to the high cost, modifying the Manufacturing Plant/Factory Crane Shed complex for adaptive reuse is deemed excessive and economically infeasible.

   Finding and Rationale: Having received, reviewed, and considered the entire record, both written and oral, relating to the project's Draft and Final Environmental Impact Report, and having weighed the pros and cons, the Planning Commission hereby rejects Alternative A and finds that specific economic, legal, social, technological, or other considerations make Alternative A infeasible and undesirable for each of the following separate, independent, and severable reasons:

   - Under Alternative A–Adaptive Reuse, this alternative would pose some limits to the second project objective, specifically to "Improve long-term economic viability of the mill and power plant operations by aligning structures and the flow of equipment and materials to the orientation of the existing production lines." Certain modifications to the flow of equipment and materials might be required to account for the retention of the Manufacturing Plant/Factory Crane Shed complex and Machine Shop. The third objective, "Salvage deconstruction materials to the extent feasible to offset costs and minimize environmental impacts" would also be met by this alternative, as reclaimable materials would be salvaged from the structures that are demolished.
     The mill complex structural evaluation determined that adaptive reuse potential for the majority of mill structures was none or low with the exception of the Manufacturing Plant/Factory Crane Shed complex (medium), Maintenance Storage (medium), and Annex (high). The HRA report (Appendix C) determined that the Maintenance Storage and Annex structures were constructed outside of the period of significance and thus are "non-contributing." Similarly, the power

complex structural evaluation determined that, with the exception of the Machine Shop, the adaptive reuse potential was low or there was no potential for adaptive reuse. While the Steel Shed was found to have medium potential for adaptive reuse, this structure was determined to be non-contributing (no historic significance) by the HRA.

- HRC has stated that the adaptive reuse of the Manufacturing Plant/Factory Crane Shed complex can be supported if costs are feasible and clearances can be provided as necessary for use as a warehouse and shipping facility. The *Cost Estimates for Modifications to Existing Mill Structures* (Appendix K) concluded that the costs involved in arresting degradation of structural members, bringing these structures up to current code, and adapting the Manufacturing Plant/Factory Crane Shed for use as a warehouse and shipping facility (modifying structural columns to provide adequate clearance) would be far more than for building a new pre-engineered structure, due to the need to support the much heavier existing roofing system. Furthermore, HRC stated that if it were to construct such a building in Scotia from scratch, it would only be a 100,000-sf metal building (Appendix L; as opposed to 187,000 sf assumed in cost opinion Appendix K). Using the $33-$41 per square foot cost estimate from Appendix K for a new replacement structure, a 100,000-sf pre-engineered metal building would cost in the range of $3,300,000-$4,100,000 ($33/sf x 100,000 sf = $3,300,000; $41/sf x 100,000 sf = $4,100,000). When compared with the $3,300,000-$4,100,000 cost range for constructing a new pre-engineered metal building meeting HRC's requirements for a warehouse/shipping building, the $8,772,000 (without retaining roof-mounted cyclones)-$12,125,000 (with retaining roof-mounted cyclones) cost of modifying the Manufacturing Plant/Factory Crane Shed complex for adaptive reuse is deemed excessive and economically infeasible.

- The HRA found that rehabilitation of the existing buildings and structures to maintain functional and cost-effective operations would likely damage much of the character-defining features originally defining the structures as historical resources. However, it would be possible to upgrade interior support systems of the complex while retaining the exterior façade, which would retain the historical character visible from outside the building. Portions of the roof system might be restored or retained as examples of historical structural construction though connection points suffering from rot would need to be replaced. At the power plant complex, the structural evaluation found that the Machine Shop could be adaptively reused as a machine and fabrication shop, or for continued storage, as it is in good structural condition and is currently being used for storage. Although the hazard posed by structures that are in various stages of decay and deterioration would be removed either by demolition or upgrading for adaptive reuse, all structures except the Manufacturing Plant/Factory Crane Shed and Machine Shop would still be demolished due to their poor potential for adaptive reuse. These structures are obsolete and not consistent with current technology; and they would all need to be completely replaced to bring them to current performance standards.

- The impacts to aesthetics and cultural resources would remain significant despite adaptive reuse of the Manufacturing Plant/Factory Crane Shed complex and Machine Shop and other mitigation measures, but would be less than the proposed project where all of the buildings and structures would be removed.

Reference: DEIR pages 125-126

3. **Alternative B** involved possible relocation of two contributing structures–the Office and Grinding Room. Under this alternative, the balance of structures would be deconstructed the same as with the proposed project. The mill complex structural evaluation determined that the Grinding Room, measuring approximately 45 feet by 50 feet, has low potential for relocation. The mill complex structural evaluation determined that the Grinding Room, measuring approximately 45 feet by 50 feet, has low potential for relocation. It would have to first be dismantled and then reconstructed in a new location (cost estimated at $100,000-$151,000. Also, it is surrounded by structures that are proposed to remain (on three sides), and the Manufacturing Plant on the other side, which may or may not remain. If these structures remain, it would be difficult to access the Grinding Room building for relocation. The Office could be relocated to another site in Scotia (such as, the ballpark where it could serve as a ticket booth or snack bar or something similar elsewhere in the town; cost estimated at $89,000-$133,000, Additionally, the balance of structures would still be deconstructed and the impact on historical and aesthetic resources would continue to be significant even after applicable mitigation. Due to the high cost, and the fact that historical and aesthetic resource impacts would continue to be significant, relocation of the Office and Grinding Room for reuse elsewhere on the property is deemed excessive and economically infeasible.

   Finding and Rationale: Having received, reviewed, and considered the entire record, both written and oral, relating to the project's Draft and Final Environmental Impact Report, and having weighed the pros and cons, the Planning Commission hereby rejects Alternative B and finds that specific economic, legal, social, technological, or other considerations make Alternative B infeasible and undesirable for each of the following separate, independent, and severable reasons:

   - Under Alternative B–Relocation, relocations would be limited to the Office and Grinding Room, because their relocation potential is medium and low, respectively, and both appear to have a movement corridor available under this alternative. However, the balance of the historically significant structures would be deconstructed, resulting in significant impacts to historical resources and aesthetics that cannot be fully mitigated, although those impacts would be slightly less than for the proposed project.

   - Although relocation of the Office and possibly the Grinding Room to an on- or offsite location appears feasible, the balance of structures would still be deconstructed due to their low (or nonexistent) potential for relocation and the impact on historical and aesthetic resources would continue to be significant even after applicable mitigation. The HRA prepared for the proposed project presents mitigation measures designed to offset impacts to cultural resources. (See "Section 2.5 Cultural Resources" and "Chapter 6: Mitigation Monitoring and Reporting Program.") Under this alternative, the mitigation measures recommended for the proposed project would apply. The impact to aesthetics would remain significant due to the fact that although selected historical structures would be retained, they would be relocated off site and absent from the existing visual setting. Measures are unavailable to reduce this impact to aesthetics to less than significant. The impacts to cultural resources would be slightly less than the proposed project. However, even with proposed mitigation measures, the significant impacts to cultural resources will not be reduced to
     less than significant.

Reference: DEIR pages 126-132

4. **Alternative C** involved stabilizing in place, with or without modifications, with no expectation of a subsequent use: 1) the Machine Shop, and 2) either the Manufacturing Plant/Factory Crane Shed complex, or just the Factory Crane Shed façade. Stabilization would include elements, such as, maintenance, repair, reinforcement, ventilation, and security that would be necessary to preserve the structure without rapid loss of integrity so as to allow potential future opportunities for adaptive reuse. Under this alternative, the balance of structures would be demolished as with the proposed project. The structural evaluations (Appendices D and J) determined that the potential for stabilization in place for the majority of structures was none or low. In almost every case, either the costs involved in repairing decay and achieving stabilization were deemed excessive, and/or stabilization would not provide HRC any useful function for ongoing industrial operations. Furthermore, many stabilized structures would continue to hinder the long-term economic viability of the mill and power plant operations by failing to align structures and the flow of equipment and materials to the orientation of the existing production lines. Without the necessary modifications to stabilize certain structures, the ongoing hazard of decay and possible collapse would pose hazards to workers and others in the vicinity of the structure(s), including potentially as an attractive nuisance. Because it is currently in use for storage, it is assumed that stabilization of the Machine Shop is feasible in terms of cost. Because it would have no utility to HRC other than mitigation value, the cost of stabilizing the Manufacturing Plant/Factory Crane Shed complex at $5,856,000 (without retaining roof-mounted cyclones) to $8,560,000 (with retaining roof-mounted cyclones) is deemed excessive and infeasible. The cost of stabilizing just the Factory Crane Shed façade, although also high, is a potentially feasible $1,159,000- $1,417,000. The Factory Crane Shed façade is the most visible as viewed from Main Street where the lettering "The Pacific Lumber Company" announces the presence of this historic mill (see below-photo of Factory Crane Shed). If stabilized in place, with or without the Manufacturing Plant, it could continue to serve as a historic landmark of the timber town era of the North Coast and would reduce the aesthetic and historical resource impacts from removing the other structures (although these impacts would remain significant, unavoidable, and irreversible). Under Alternative C–Stabilization, the impact on historical and aesthetic resources would continue to be significant even after applicable mitigation. However, these impacts would be less than for the proposed project in which all of the buildings and structures would be removed. Due to the high cost and the fact that historical and aesthetic resource impacts would continue to be significant, stabilization in place is deemed excessive and economically infeasible.

Finding and Rationale: Having received, reviewed, and considered the entire record, both written and oral, relating to the project's Draft and Final Environmental Impact Report, and having weighed the pros and cons, the Planning Commission hereby rejects Alternative C and finds that specific economic, legal, social, technological, or other considerations make Alternative C infeasible and undesirable for each of the following separate, independent, and severable reasons:

- Under Alternative C–Stabilization, the Machine Shop and either the Manufacturing Plant/Factory Crane Shed complex or just the Factory Crane Shed façade would be stabilized in place, depending on economic feasibility. The balance of structures would be deconstructed, resulting in significant impacts to historical resources and aesthetics that cannot be fully mitigated, although those impacts would be slightly less than for the proposed project.

- It is not likely that any structure would be stabilized in place without modifications due to the potential for seismic events and ongoing decay that could result in partial or total collapse. This alternative would pose some limits to the second project objective, which is to "Improve long-term economic viability of the mill and power plant operations by aligning structures and the flow of equipment and materials to the orientation of the existing production lines." Certain modifications to the flow of equipment and materials might be required to account for the retention of the stabilized-in-place structure(s).

- Although stabilization of the Machine Shop and either the Manufacturing Plant/Factory Crane Shed complex or just the Factory Crane Shed façade may be feasible, the balance of structures would still be deconstructed due to their low or nonexistent potential for stabilization, lack of useful function for HRC's ongoing mill or power plant operations, and/or lack of historical significance. The impacts on historical resources and aesthetics would continue to be significant even after applicable mitigation.

- Because it is currently in use for storage, it is assumed that stabilization of the Machine Shop is feasible in terms of cost. Because it would have no utility to HRC other than mitigation value, the cost of stabilizing the Manufacturing Plant/Factory Crane Shed complex at $5,856,000 (without retaining roof-mounted cyclones) to $8,560,000 (with retaining roof-mounted cyclones) is deemed excessive and infeasible. The cost of stabilizing just the Factory Crane Shed façade, although also high, is a potentially feasible $1,159,000- $1,417,000.

Reference: DEIR pages 133-142

5. **Alternative D** is a hybrid alternative that calls for the stabilization in place of the Factory Crane Shed façade; relocation of the Office and Grinding Room to another site within the town of Scotia for a yet-to-be-identified use; and adaptive reuse of the Machine Shop for a machine and fabrication shop or for storage. The cost of stabilizing the Factory Crane Shed was estimated to be $1,159,000- $1,417,000 (Appendix K). Although it would provide no useful function for HRC's ongoing operations, stabilizing the Factory Crane Shed façade would preserve a historic "landmark" of the "days of old" in the lumbering business and company town era. This structure is also the dominant feature of the visual environment as you travel along Main Street heading toward the mill. The Office could potentially be relocated if a travel corridor could be identified (medium relocation potential). A travel corridor does appear to exist under this alternative, allowing relocation of the office whole. The cost estimate determined that relocating the Office and placing it on a new foundation, assuming that the CHBC requirements would apply, would cost in the range of $89,000-$133,000. Assuming that a suitable corridor for removing and relocating the Grinding Room would be available (that is, if the Manufacturing Plant were deconstructed), the estimate for moving the Grinding Room building intact, and placing it on a new foundation, is $75,000-$112,000. Under Alternative D, which calls for the stabilizing the Factory Crane Shed façade, relocating the Office and Grinding Room, and adaptive reuse of the Machine Shop, the balance of the structures would still be deconstructed. The impacts to aesthetics and historical resources would remain significant even after mitigation, although these impacts would be less than for the proposed project, in which all the structures would be demolished

(and less than for any other feasible alternative). Due to the high cost and the fact that historical and aesthetic resource impacts would continue to be significant, the hybrid alternative to stabilize the Factory Crane Shed façade in place is deemed excessive and economically infeasible.

Finding and Rationale: Having received, reviewed, and considered the entire record, both written and oral, relating to the project's Draft and Final Environmental Impact Report, and having weighed the pros and cons, the Planning Commission hereby rejects Alternative D and finds that specific economic, legal, social, technological, or other considerations make Alternative D infeasible and undesirable for each of the following separate, independent, and severable reasons:

- Alternative D is a hybrid alternative that calls for the stabilization in place of the Factory Crane Shed façade; relocation of the Office and Grinding Room to another site within the town of Scotia for a yet-to-be-identified use; and adaptive reuse of the Machine Shop for a machine and fabrication shop or for storage. Even with the retention of these structures, significant impacts to aesthetics and historical resources would occur as the balance of structures would be demolished, although these impacts would be less than for the proposed project, in which all the structures would be demolished (and less than for any other feasible alternative).

- It is not likely that any structure would be stabilized in place without modifications due to the potential for seismic events and ongoing decay that could result in partial or total collapse. This alternative would pose some limits to the second project objective, which is to "Improve long-term economic viability of the mill and power plant operations by aligning structures and the flow of equipment and materials to the orientation of the existing production lines." Certain modifications to the flow of equipment and materials might be required to account for the retention of the adaptively reused and stabilized-in-place structures.

- Although stabilization in place of the Factory Crane Shed façade, relocation of the Office and Grinding Room, and adaptive reuse of the Machine Shop may be feasible, the balance of structures would still be deconstructed due to their low or nonexistent potential for adaptive reuse, relocation, and stabilization, lack of useful function for HRC's ongoing mill or power plant operations, and/or lack of historical significance.

Reference: DEIR pages 143-149

6. The Environmentally Superior Alternative was found to be Alternative D in the EIR because it results in the least damage to the environment, best protects community and natural resources, and partially meets the project objectives. However, as noted above, due to the high cost and the fact that historical and aesthetic resource impacts would continue to be significant, the hybrid alternative to stabilize the Factory Crane Shed façade in place is deemed excessive and economically infeasible.

   Finding and Rationale: Having received, reviewed, and considered the entire record, both written and oral, relating to the project's Draft and Final Environmental Impact Report, and having weighed the pros and cons, the Planning Commission hereby rejects the Environmentally Preferred Alternative (Alternative D) and finds that specific economic, legal, social, technological, or other considerations make Alternative D

infeasible and undesirable for the separate, independent, and severable reasons identified for Alternative D above.

Reference: DEIR pages 154-156

7. The Planning Commission finds that there are further details and specifications of two proposed mitigation measures that could further address potential cultural resource impacts, although such impacts would remain significant even after mitigation. The County finds the proposed project, with the inclusion of all of the mitigation measures identified in the EIR and as modified below for CUL-2 and CUL-3, is the preferred alternative due to the findings identified for Alternatives A through D as noted above.

   CUL-2. Scotia Archives. Existing data, photographs, and information, as well as historical documentation collected as part of Mitigation Measure CUL-1 Recordation, will be organized and categorized in an archival system both physically located within the town of Scotia and digitally online. The archives mitigation will be prepared with the assistance of a qualified historian and will include archival records; organization and systemization of existing Scotia documents and records; historic American buildings survey (HABS) and historic American engineering record (HAER) documentation; compilation of additional oral history (if suitable interview subjects can be identified); creation of an interpretive framework focused on historical and cultural research; development of history-based exhibits and interpretive panels about Scotia's industrial history; and publication of history information for visitors and educational purposes.

   CUL-3. Interpretive Display. HRC will develop a display of the photographs and documentation for public exhibition. The interpretive display will include photographs with captions, examples of historic equipment, and a narrated video documenting the buildings to be demolished, the history of the mill and power plant, and the changes to the timber industry over time that have led to the obsolescence of the buildings to be demolished. The interpretive display will be made available for public viewing in the Office building, which as part of this mitigation measure will be relocated to a new location immediately south of HRC's existing fish exhibit (on the eastern edge of the mill parcel; Assessor's parcel number 205-351-030). The interpretive display will open to the public for self-guided tours Monday through Saturday from 8 AM to 4 PM. HRC will also be responsible for ensuring that the interpretive display materials and archives mitigation are available to the general public on the internet.

STATEMENT OF OVERRIDING CONSIDERATIONS REQUIRED

The County finds the project proposed and analyzed in the Draft EIR and Final EIR does result in project impacts that cannot be avoided completely or mitigated to a level that is demonstrably less-than-significant and that a Statement of Overriding Considerations, pursuant to section 15093 of the CEQA Guidelines, is required for this project. A Statement of Overriding Considerations is included in Exhibit B.

EXHIBIT B - Statement of Overriding Considerations

As set forth in the Resolution, Findings, and Board Report, the County's approval of the Project will result in significant adverse environmental effects that cannot be avoided even with the adoption of all feasible mitigation measures. Despite the occurrence of these effects, however, the County chooses to approve the Project because in its view, the economic, legal, social, technological and other benefits that the Project will produce will render the significant effects acceptable. (Pub. Resources Code § 21021; CEQA Guidelines, § 15093.) Specifically, the County determines that the benefits of the Project outweigh the above-referenced significant environmental effects of the Project, and are therefore acceptable.

The following statement identifies why, in the County's judgment, the benefits of the Project will outweigh its unavoidable significant effects. Any one of these reasons is sufficient to justify approval of the Project. The substantial evidence supporting the various benefits can be found in the preceding findings, in the Final EIR, and in the record.

1) The industrial structures proposed for demolition are located in the potential historic district area as identified in the cultural resources survey of the Town of Scotia. The contributing structures proposed for demolition have been found to have either deteriorated beyond the point where rehabilitation is feasible, or are outdated in terms of current day processes and efficiencies and are slated for demolition. The buildings and structures are not currently occupied and have been closed and/or unused for a considerable period of time for safety considerations.

2) Demolition of the structures will serve to improve long-term economic viability of the mill and power plant operations by aligning structures and the flow of equipment and materials to the orientation of the existing production lines.

3) As discussed in detail in the Findings, alternatives to demolition, including rehabilitation or relocation of the contributing historic structures, were considered by the applicant but were found to be practically and economically infeasible.

4) An analysis of the buildings by a structural engineer (included in the EIR appendices) determined that the majority of the structures do not have adequate structural integrity to support rehabilitation and the cost of re-use is prohibitive. Relocation of the structures would require dismantling and reassembly due to their poor structural condition.

5) The proposed project with the inclusion of additional mitigation measures CUL-2 and CUL-3 will reduce or eliminate the potential for a catastrophic loss of life or property in the event of fire or earthquake.

6) The demolition, stabilization, and replacement of deteriorating and dangerous structures as proposed will reduce or eliminate the risk to emergency responders posed by the poor condition of the buildings.

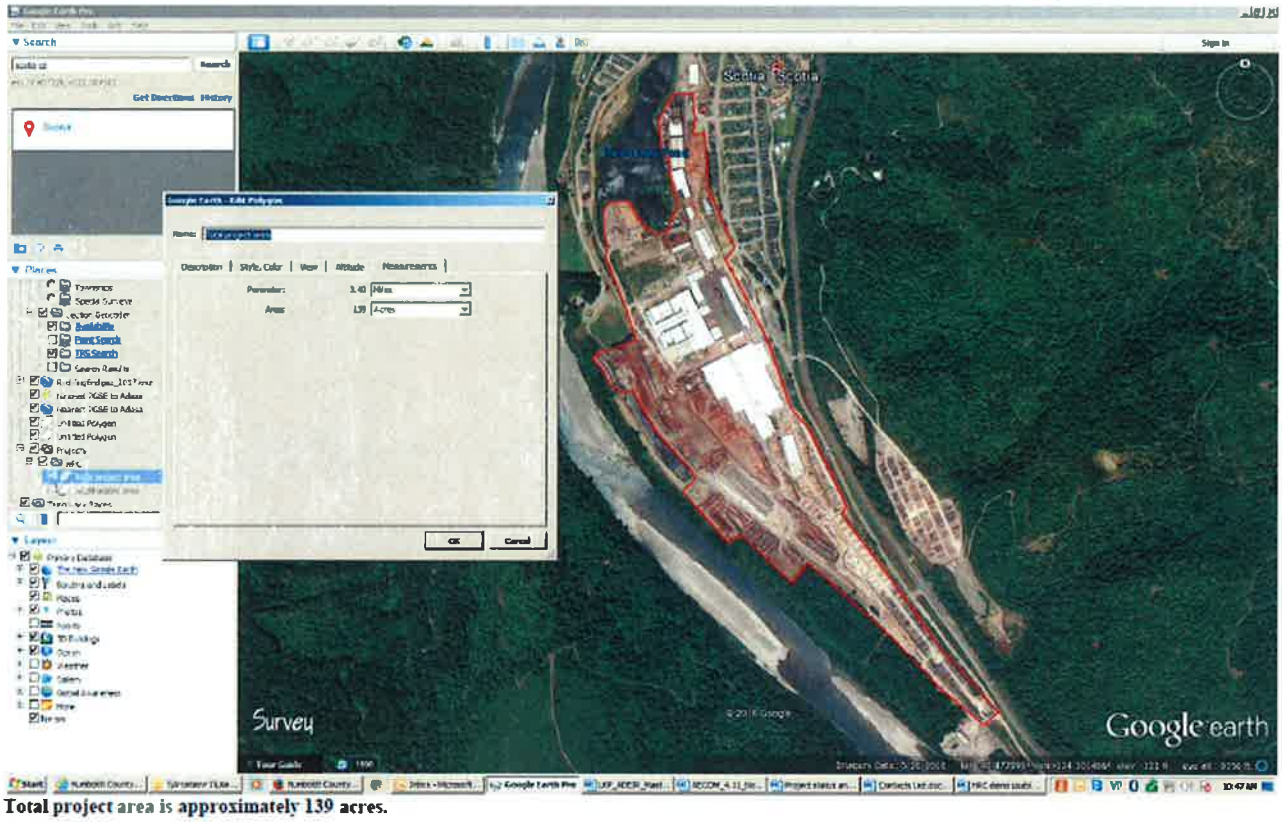
7) The Project will result in the removal of obstacles to industrial process modernization and impediments to current and future operations that are posed by the configuration and/or orientation of derelict structures, resulting in increased economic efficiency.

8) By implementing the Project, the usable acreage of the Project site would increase from 123 acres to 139 acres, an increase of 13%. This increase in usable space is projected to lead to

a proportional increase in the economic productivity of the site including the generation of additional jobs. (See Calculation of Additional Usable Area, attached hereto.)

9) The Project would reduce or eliminate the substantial cost of maintenance of buildings with no foreseeable reuse options. The Project would also ameliorate the high cost or inability to obtain liability or fire insurance.

Humboldt Redwood Company Scotia Operations Demolition Project
Calculation of Additional Usable Area That Would Result From Proposed Project
May 16, 2017



Total project area is approximately 139 acres.

O:\2014\014185-HRC-Demo-EIR\Data\Usable Area Calcs\HRC demo usable area calcs 16May2017.docx

EXHIBIT C - Mitigation Monitoring and Reporting Program

Chapter 4

Mitigation Monitoring and Reporting Program

This mitigation monitoring and reporting program (MMRP) (see Table 1) has been prepared to comply with the requirements of state law (Public Resources Code Section 21081.6). State law requires the adoption of a mitigation monitoring program when mitigation measures are required to avoid significant impacts. If an impact was found to be less than significant and did not require mitigation, no monitoring would be required. The monitoring program is intended to ensure compliance during implementation of the project. This MMRP has been formulated based upon the findings of the DEIR, and the comments received on the DEIR and addressed herein (no comment was received). This MMRP identifies mitigation measures recommended in the DEIR to avoid or reduce identified impacts, and specifies the timing for implementation/compliance, person/agency responsible for monitoring, monitoring frequency, and evidence of compliance. The first column identifies the mitigation measure. The second column identifies the timing for implementation/ compliance. The third column identifies the person/agency responsible for ensuring that the mitigation measure has been implemented and documented. The fourth column entitled "Monitoring Frequency" identifies when and/or for how long the monitoring shall occur. The fifth column entitled "Evidence of Compliance" identifies the evidence that will demonstrate that the mitigation measure has been completed. The sixth, seventh, and eighth columns ("Compliance Verification") are reserved for documenting completion of the mitigation measures. At the time indicated by "Timing for Implementation/Compliance," the "Person/Agency Responsible for Monitoring" is to initial, date, and provide any comments in this section to document completion of and compliance with the mitigation measures.

Table 1
Mitigation Monitoring and Reporting Program
HRC Scotia Operations Demolition Project EIR

Mitigation Measure	Timing for Implementation/Compliance	Person/Agency Responsible for Monitoring	Monitoring Frequency	Evidence of Compliance	Compliance Verification		
					Initial	Date	Comments
Cultural Resources							
CUL-1. Recordation. To ensure a permanent record of the properties' present appearance and context, proposed buildings and structures slated for demolition will be recorded according to historic American buildings survey (HABS) and historic American engineering record (HAER) standards prior to any deconstruction activities. The HABS/HAER documentation would be filed with the California State Office of Historic Preservation, Town of Scotia Company, LLC, Humboldt State University, and other institutions or agencies. Recordation shall also include: 1) industrial process; 2) any extant machinery and equipment used; and 3) further researching the spatial arrangements, available machinery, and other details that reveal an internal machine's function. In addition, the mitigation may include general views and details of structural framing systems, including roof trusses, bents and beam systems, and pedestals that supported the building structure and the equipment and machinery.	Prior to deconstruction activities	County of Humboldt	Complete recordation prior to deconstruction activities	Documentation of recordation provided to County of Humboldt by Humboldt Redwood Company (HRC)			
CUL-2. Scotia Archives. Existing data and information, including photographs, will be organized and categorized in an archival system both physically located within the town of Scotia and digitally online. The archives mitigation should include archival records; organization and systemization of existing Scotia documents and records; compilation of additional oral history; creation of an interpretive framework focused on historical and cultural research; development of history-based museum activities, programs, and onsite tours of industrial logging operations, exhibits, interpretive panels, historic markers, and public installations about Scotia's industrial history; publication of tour and history information for visitors and educational purposes; neighborhood history workshops; onsite instruction into various industrial techniques, products, and processes; publication (book or online) of Scotia's industrial architecture to heighten interest in Scotia; and/or participation in State of California links with other mills to increase interest in Scotia's history and culture and take advantage of historic preservation programming.	Archival data and information to be collected prior to deconstruction activities	County of Humboldt	Complete archival data collection prior to start of deconstruction activities	Documentation of archive work provided to County of Humboldt by HRC			
CUL-3. Interpretive Display. HRC will develop a display of the photographs and documentation for public exhibition.	Prior to deconstruction activities	County of Humboldt	Prior to deconstruction activities	Documentation of interpretive display provided to County of Humboldt by HRC			
CUL-4. Opportunities for Salvage. After recordation and at least 30 days prior to demolition, HRC and its contractor will have an opportunity to salvage architectural elements for reuse, curation, and later sale. Items selected will be removed in a manner that minimizes damage.	Prior to deconstruction activities	HRC, contractors, County of Humboldt	Prior to deconstruction activities	Documentation of salvage provided to County of Humboldt by HRC			
CUL-5. Inadvertent Discovery. If archaeological resources, such as, chipped or ground stone or bone, are discovered during ground-disturbance activities, work shall be stopped within 20 meters (66 feet) of the discovery, as required by the California Environmental Quality Act (CEQA; January 1999 Revised Guidelines, Title 14 California Code of Regulations [CCR] 15064.5 (f)). Work near the archaeological finds shall not resume until a professional archaeologist, who meets the Secretary of the Interior's Standards and Guidelines, has evaluated the material and offered recommendations for further action.	Ongoing throughout project implementation	HRC, contractors, County of Humboldt	Ongoing throughout project implementation	Continual observation by all parties involved			
CUL-6. Human Remains. If human remains are discovered during project construction, work will stop at the discovery location, within 20 meters (66 feet), and any nearby area reasonably suspected to overlie human remains (Public Resources Code, Section 7050.5). The Humboldt County coroner will be contacted to determine if the cause of death must be investigated. If the coroner determines that the remains are of Native American origin, it will be necessary to comply with state laws relating to the disposition of Native American burials, which fall within the jurisdiction of the North American Heritage Commission (NAHC)	Ongoing throughout project implementation	HRC, contractors, County of Humboldt	Ongoing throughout project implementation	Continual observation by all parties involved			

Table 1
Mitigation Monitoring and Reporting Program
HRC Scotia Operations Demolition Project EIR

Mitigation Measure	Timing for Implementation/Compliance	Person/Agency Responsible for Monitoring	Monitoring Frequency	Evidence of Compliance	Compliance Verification		
					Initial	Date	Comments
(Public Resources Code, Section 5097). The coroner will contact the NAHC. The descendants, or most likely descendants, of the deceased will be contacted and work will not resume until they have made a recommendation to the landowner or the person responsible for the excavation work for means of treatment and disposition, with appropriate dignity, of the human remains and any associated grave goods, as provided in Public Resources Code, Section 5097.98. Work may resume if NAHC is unable to identify a descendant or the descendant failed to make a recommendation.							
Aesthetics							
AES-1: Outdoor Lighting. During project implementation, outdoor lighting for safety and security may be strategically located on the sawmill and power complex sites as necessary to safely operate the system and protect the facility from trespass and vandalism. These lights will be fitted with shade features that direct the light downward thus eliminating offsite glare. In some cases these lights could be motion-activated. These lights will not create a new source of substantial light or glare that could adversely affect day or nighttime views in the area.	Ongoing throughout project implementation	County of Humboldt	Ongoing throughout project implementation	Continual observation by all parties involved, and making any changes to site lighting as warranted to achieve the mitigation measure			
Air Quality							
AIR-1. Fugitive Dust. To mitigate potential impacts to air quality during the project, the following mitigation measures should be applied: **AIR-1a.** All active deconstruction areas shall be watered at a rate sufficient to keep soil moist and prevent formation of wind-blown dust. **AIR-1b.** All trucks hauling reclaimable and non-reclaimable material, fill, and other loose materials shall be covered, or all trucks shall be required to maintain at least 2 feet of freeboard. **AIR-1c.** All unpaved access roads, parking areas, and construction staging areas shall be paved, watered daily, or treated with non-toxic soil stabilizers during construction. **AIR-1d.** All paved access roads, parking areas, and deconstruction staging areas shall be cleaned daily with water sweepers during construction. **AIR-1e.** If visible soil is carried out onto adjacent streets, the area shall be washed with water or by a water sweeper truck. **AIR-1f.** Hydroseeding or non-toxic soil stabilizers shall be applied to inactive construction areas (previously graded areas inactive for 10 days or more). **AIR-1g.** Exposed stockpiles of dirt, sand, and similar material shall be enclosed, covered, watered daily, or treated with non-toxic soil binders. **AIR-1h.** Traffic speeds on unpaved roads shall be limited to 10 miles per hour. **AIR-1i.** Vegetation in disturbed areas shall be replanted as quickly as possible. **AIR-1j.** Outdoor dust-producing activities shall be suspended when high winds create visible dust plumes in spite of control measures.	Ongoing during project implementation	HRC, contractors, County of Humboldt	Ongoing during project implementation	Continual observation by all parties involved, and making any changes to project activities or operating guidelines, as warranted to achieve the mitigation measures			
Hazards and Hazardous Materials							
HAZ-1. Soil and Groundwater Management Contingency Plan. To mitigate potential impacts regarding hazardous materials in the event that residual petroleum hydrocarbons in soil and/or groundwater are encountered during project implementation, all the recommendations of the *Soil and Groundwater Management Contingency Plan-Former PALCO Mill B, Scotia, California, Case No. 1NHU857* (SHN, February 2013) shall be implemented. It describes necessary actions to be taken prior to and during the implementation of subsurface work in the event that contaminated soil and/or groundwater is encountered. It includes appropriate actions to address worker training, waste characterization, handling, and proper disposal of contaminated soil and/or groundwater that may be encountered.	Prior to and during ground-disturbing project activities	HRC, contractors, County of Humboldt	Prior to and ongoing during ground-disturbing project activities	In accordance with the requirements of the soil and groundwater management contingency plan (SGMCP), and			

Table 1
Mitigation Monitoring and Reporting Program
HRC Scotia Operations Demolition Project EIR

Mitigation Measure	Timing for Implementation/Compliance	Person/Agency Responsible for Monitoring	Monitoring Frequency	Evidence of Compliance	Compliance Verification		
					Initial	Date	Comments
				prior to commencement of ground-disturbing project activities, contractor will prepare a site specific health and safety plan and HRC will submit it to County of Humboldt; also, continual observation by all parties involved, and making any changes to project activities or operating guidelines, as warranted to achieve compliance with the SGMCP.			
Biological Resources							
BIO-1. Seasonal Restrictions. To avoid direct and indirect impacts to nesting barn swallows (*Hirundo rustica*), violet-green swallows (*Tachycineta thalassina*), Townsend's big-eared bats (*Corynorhinus townsendii*), and pallid bats (*Antrozous pallidus*) seasonal restrictions on building demolition activities will be applied to certain structures in which (or directly adjacent to which) the swallows and bats may nest. Demolition activities at the following structures will be limited to the period between September 16 and February 28: • West Kiln/Sorter Crane Shed • North Wing Loading Shed • South Wing Loading Shed • North Wing Dry Kilns • South Wing Dry Kilns • North Wing Cooling Sheds • South Wing Cooling Sheds • East Kiln/Sorter Crane Shed • Conveyor and Tower • Northern Monorail Tunnel Demolition activities at the following structures will be limited to the period between September 1 and February 28: • Southern Monorail Tunnel #1 • Manufacturing Plant	Seasonally during project implementation	HRC, contractors, County of Humboldt	Ongoing for duration of project	Continual observation by all parties involved, and making any changes to project activities or operating guidelines, as warranted to achieve mitigation measure			

Table 1
Mitigation Monitoring and Reporting Program
HRC Scotia Operations Demolition Project EIR

Mitigation Measure	Timing for Implementation/Compliance	Person/Agency Responsible for Monitoring	Monitoring Frequency	Evidence of Compliance	Compliance Verification		
					Initial	Date	Comments
• Factory Crane Shed • Southern Monorail Tunnel #2 • Maintenance Storage • Annex Demolition activities at the following structures will be limited to the period between August 16 and May 14: • Dry Sorter Shed • Machine Shop • Millwright Building • Steel Shed • Pipe Insulation Building • Steamfitters Building • Water Treatment Plant • Powerhouse • Fuel Storage Building No seasonal restriction is necessary at the following structures: • Office • Grinding Room • Knife Hog • Boiler Building The seasonal restrictions on building demolition may be altered through further consultation with the California Department of Fish and Wildlife (CDFW) if, for example, it can be demonstrated that no nest or roost is occupied after July 31, or if potential roosting habitat has been altered to the extent that it is no longer suitable. Seasonal restrictions shall only apply to building demolition and not to subsequent grading activities.							
BIO-2. Bat Boxes. To provide alternate bat roosting habitat, HRC shall install a bat box or boxes in the Scotia sawmill and/or power plant vicinity, as near as possible to the demolition project area. The location of the structures will take into consideration other factors, such as, activity levels, noise, lights, and aspect. The structure(s) will be designed and installed with CDFW guidance and approval. The bat box or boxes will be monitored for use, and if necessary, relocated as appropriate.	Prior to demolition of structures	County of Humboldt	Ongoing during project implementation	CDFW approval			