



COUNTY OF HUMBOLDT
PLANNING AND BUILDING DEPARTMENT
CURRENT PLANNING DIVISION

3015 H Street • Eureka CA 95501
Phone: (707) 445-7541 • Fax: (707) 268-3792

Hearing Date: July 13, 2017

TO: Humboldt County Planning Commission

FROM: John H. Ford, Director of Planning and Building Department

SUBJECT: Humboldt Redwood Company Conditional Use Permit
Application Number: 8738
Case Number CUP-13-013
Assessor's Parcel Numbers 205-351-023 and 205-351-030
Scotia Area

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Please contact Michael Wheeler at (707) 268-3730, or by e-mail at mwheeler@co.humboldt.ca.us, if you have any questions about the scheduled public hearing item.

AGENDA ITEM TRANSMITTAL

Meeting Date: July 13, 2017	Subject: Public Hearing Conditional Use Permit CUP-13-013	Contact: Michael Wheeler
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Project Description: Humboldt Redwood Company (HRC) owns and operates the sawmill complex and power plant complex in the town of Scotia. There are several abandoned or partially abandoned structures on the north end of the sawmill complex and the south end of the power plant complex that HRC proposes to demolish (deconstruct). Demolition (removal by deconstruction) would occur as soon as possible and would take an estimated 9 to 12 months total to complete. Buildings proposed for demolition will be systematically dismantled and taken apart starting at one end of the structure and working from top to bottom to the other end of the structure. Foundations will be demolished down to the existing ground surface (not fully excavated and removed). Concrete ground level and basement ground level floors and footings will remain. Methods for demolition and dismantling may include mechanically pinching, shearing, or crushing structural components and/or deconstruction (where structures are taken apart in the reverse order in which they were constructed). These methods allow a large percentage of removed material to be reused, repurposed, or recycled (reclaimed), with only a small percentage of materials going to landfills. Following demolition, the site will be filled, as necessary, to its final grade. Tools and equipment used for demolition and dismantling may include: cranes, hydraulic excavators with demolition attachments, skid-steer loaders, forklifts, and power and hand tools. Filling and final grading will involve the use of heavy equipment, consistent with the types of equipment regularly used at the site (loaders, dump trucks, etc.).

Project Location: The project site is located in Humboldt County, in the Scotia area, on the west side of State Highway 101, on the property known as the community of Scotia.

Present Plan land Use Designation: Industrial, General (IG), Agricultural/General (AG), Timber Production (T)

Present Zoning: MH-Q;AG;U;TPZ, Heavy Industrial (MH), Qualified (Q)

Case Number: CUP 13-013

Application Number: 8738

Assessor Parcel Number: 205-351-023 and 205-351-030

Applicant

Humboldt Redwood Company,
LLC
Dean Kerstetter
PO Box 120
Ukiah, CA 95482

Owner

Town Of Scotia Company LLC Co
Po Box 245
Scotia, CA 95565

Agent

SHN Consulting Engineers and
Geologists
Stein Coriell
812 W. Wabash Ave
Eureka, CA 95501

Additional Owner:

Alexander Redwood Partners, LLC, 1360 19th Hole Dr., Suite 200, Windsor, CA, 95492, 707-620-2974,

Environmental Review: Environmental review is required.

Major Issues: Historic structure demolition

State Appeal Status: Project is NOT appealable to the California Coastal Commission

EXECUTIVE SUMMARY

Humboldt Redwood Company Conditional Use Permit CUP-13-013 Assessor's Parcel Numbers 205-351-023 and 205-351-030

Recommended Commission Action

1. Describe the application as a Public Hearing;
2. Request that staff present the project;
3. Open the public hearing and receive testimony; and
4. Close the hearing and take the following action:

Move to certify the Final Environmental Impact Report, and to make all of the required findings for approval of the Conditional Use Permit based on evidence in the staff report and any public testimony, and adopt the Resolution approving the proposed Humboldt Redwood Company project subject to the recommended conditions.

Humboldt Redwood Company (HRC) owns and operates the sawmill complex and power plant complex in the town of Scotia. There are several abandoned or partially abandoned structures on the north end of the sawmill complex and the south end of the power plant complex that HRC proposes to demolish (deconstruct). Demolition (removal by deconstruction) would occur as soon as possible and would take an estimated 9 to 12 months total to complete. Buildings proposed for demolition will be systematically dismantled and taken apart starting at one end of the structure and working from top to bottom to the other end of the structure. Foundations will be demolished down to the existing ground surface (not fully excavated and removed). Concrete ground level and basement ground level floors and footings will remain. Methods for demolition and dismantling may include mechanically pinching, shearing, or crushing structural components and/or deconstruction (where structures are taken apart in the reverse order in which they were constructed). These methods allow a large percentage of removed material to be reused, repurposed, or recycled (reclaimed), with only a small percentage of materials going to landfills. Following demolition, the site will be filled, as necessary, to its final grade. Tools and equipment used for demolition and dismantling may include: cranes, hydraulic excavators with demolition attachments, skid-steer loaders, forklifts, and power and hand tools. Filling and final grading will involve the use of heavy equipment, consistent with the types of equipment regularly used at the site (loaders, dump trucks, etc.).

The proposed project requires a Conditional Use Permit and the preparation of an Environmental Impact Report. 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. A Draft Environmental Impact Report was prepared and 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). 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. No comments on the Draft EIR were received during that period. In accordance with CEQA, a Final Environmental Impact Report (Final EIR) was completed on May 2, 2017 and sent to the State Clearinghouse for a final 10 day review period starting May 8, 2017. No comments were submitted during this review period as well.

The EIR found that the proposed demolition (removal by deconstruction) of up to 30 structures (26 of which are defined as "contributing") will cause a substantial, irreversible, adverse change in the significance of the historical resources and their physical characteristics. To mitigate potential impacts to historical resources several mitigation measures are proposed, however, the effects would remain significant even with the mitigation, and a Statement of Overriding Considerations is required. Another

impact category for which there are significant effects even with mitigation is aesthetics. Impact categories which are mitigated to less than significant include: biological resources, air quality, and hazardous materials.

CEQA guidelines state that the EIR must describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. Besides the Proposed Project and the No Project Alternative, the EIR analyzed the following alternatives to the proposed project:

- Alternative A–Adaptive Reuse
- Alternative B–Relocation
- Alternative C–Stabilization in place with or without modifications
- Alternative D–Combination of Adaptive Reuse, Relocation, and Stabilization in Place.

Staff Recommendation on Conditional Use Permit: Based upon the on-site inspection, a review of Planning Division reference sources, and comments from all involved referral agencies, the Department believes that the applicant has submitted evidence in support of making all of the required findings for approving the proposed Conditional Use Permit.

Staff Recommendation on Alternatives Analysis:

Staff recommends the Planning Commission reject the No Project Alternative and find that specific economic, legal, social, technological, or other considerations make the No Project Alternative infeasible and undesirable. Under this alternative the status quo would be maintained but none of the objectives of the project would be realized.

Staff recommends the Planning Commission reject Alternative A (Adaptive Reuse) and find that specific economic, legal, social, technological, or other considerations make Alternative A infeasible and undesirable. As most of the structures were designed and constructed for a single purpose or function (e.g., dry kiln) the potential that they could be adapted for an alternative reuse is extremely low. Furthermore, Alternative A 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."

Staff recommends the Planning Commission reject Alternative B (Relocation) and find that specific economic, legal, social, technological, or other considerations make Alternative B infeasible and undesirable. Under Alternative B, the buildings and structures that have potential for relocation would be limited to the Office and Grinding Room. This is because these buildings are small. However, the relocation of these structures is complicated by them being located within heavily developed portions of the mill and power plant parcels. Even if the two small buildings were to be deconstructed and rebuilt, 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.

Staff recommends the Planning Commission reject Alternative C (Stabilization in Place) and find that specific economic, legal, social, technological, or other considerations make Alternative C infeasible and undesirable. The stabilization alternative would retain some of the existing structures in place waiting for a future unknown reuse opportunity. Stabilization would be costly and as with Alternative B would frustrate the primary project objective 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." 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 at 1,159,000- \$1,417,000.

Staff recommends the Planning Commission reject Alternative D (Combination Alternative) and find that specific economic, legal, social, technological, or other considerations make Alternative D infeasible and undesirable. 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. As noted for Alternative C, the cost of stabilizing the Factory Crane Shed was estimated to be \$1,159,000- \$1,417,000. 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. 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. 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.

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.

Staff further recommends that the Planning Commission find 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. Staff recommends that the Planning Commission find the proposed project, with the inclusion of all of the mitigation measures identified in the EIR (Section 2.5.1, pages 35-37) 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, and as more fully described in Exhibit A to the Draft Resolution.

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.

Alternatives: Several alternatives may be considered: 1) The Planning Commission could elect not to hear this item and put the decision making in front of the Board of Supervisors. Any decision to place this matter before the Board of Supervisors must be done before opening the public hearing on this project; 2) The Planning Commission could elect to add or delete conditions of approval; 3) The Planning Commission could deny approval of the requested permit if unable to make all of the required findings. Planning Division staff is confident that the required findings can be made based on the submitted evidence and subject to the recommended conditions of approval. Consequently, planning staff does not recommend further consideration of these alternatives.

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

**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; and

WHEREAS, the County Planning Division 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 and 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 as proposed, 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.

Chair, Humboldt County Planning Commission

Adopted on motion by Commissioner _____
and the following vote:

_____, seconded by Commissioner _____

AYES: Commissioners:

NOES: Commissioners:

ABSENT: Commissioners:

STATE OF CALIFORNIA)
) SS.
County of Humboldt)

I, Suzanne Lippre, Clerk of the Planning Commission of the County of Humboldt, State of California do hereby certify the foregoing to be a full, true, and correct copy of the original made in the above-titled matter by said Planning Commission at a meeting held in Eureka, California as the same now appears of record in my office.

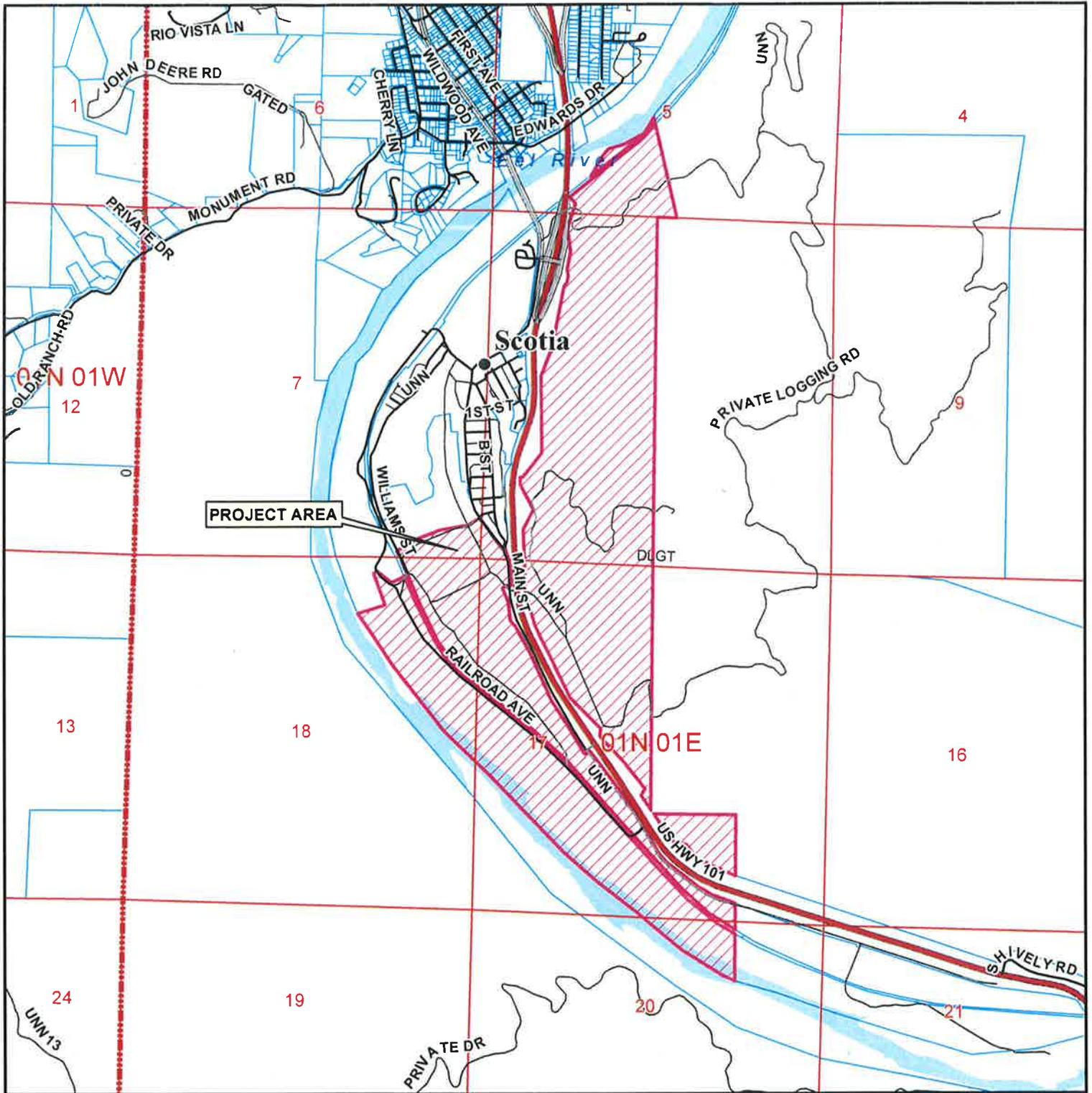
I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

In Witness Whereof, I have hereunto set my hand and affixed the Seal of said Board of Supervisors.

SUZANNE LIPPRE
Clerk of the Planning Commission of the County of Humboldt, State of California

By: _____
SUZANNE LIPPRE

Date: _____, 2017



LOCATION MAP

**PROPOSED HUMBOLDT REDWOOD COMPANY
CONDITIONAL USE PERMIT**

SCOTIA AREA

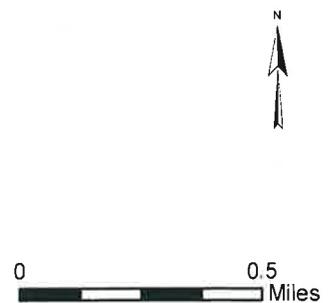
CUP-13-013

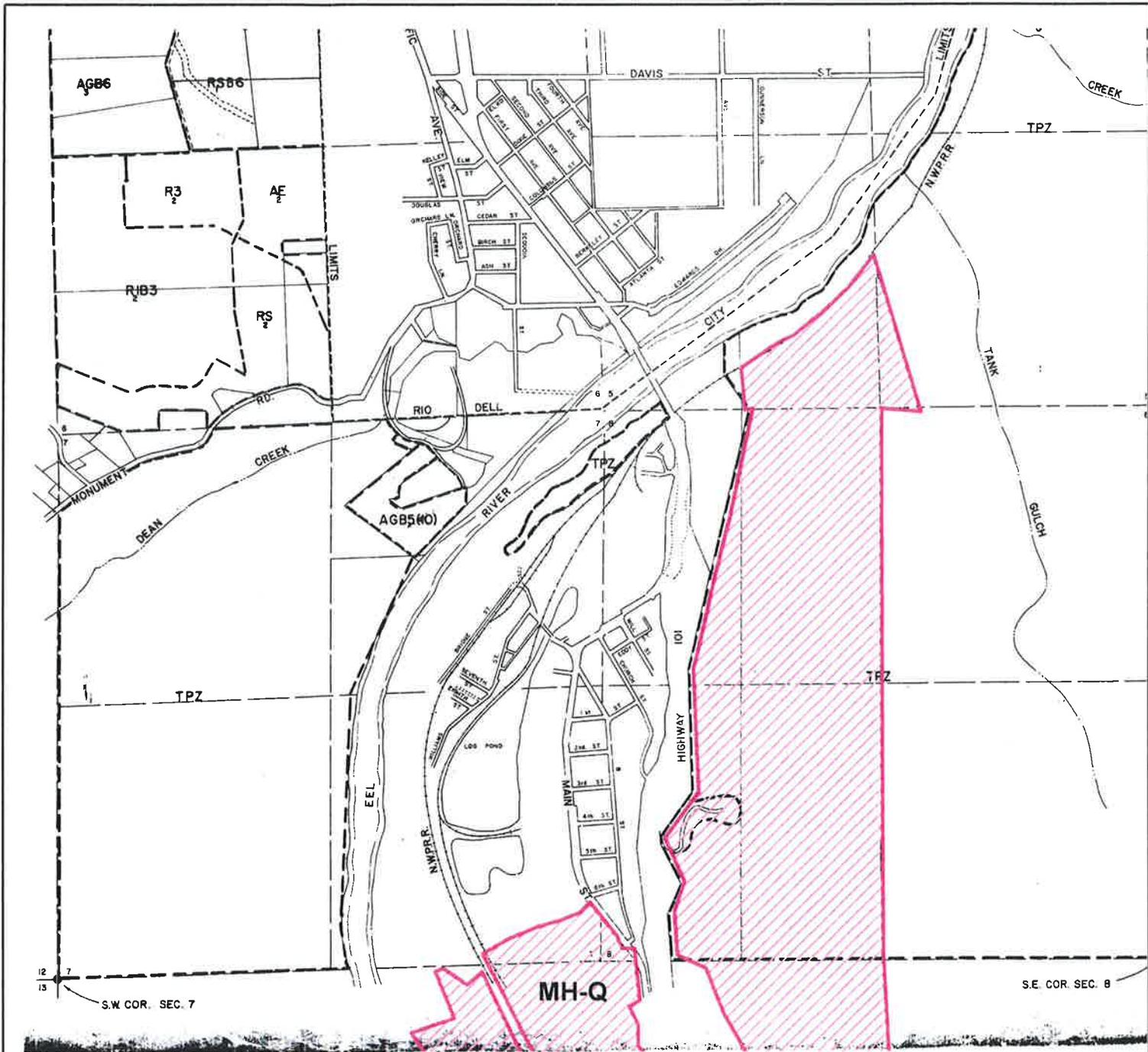
APN: 205-351-030

T01N R01E S5, 7-8, 17-18, 20 HB&M (Scotia)

Project Area = 

This map is intended for display purposes and should not be used for precise measurement or navigation. Data has not been completely checked for accuracy.

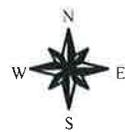




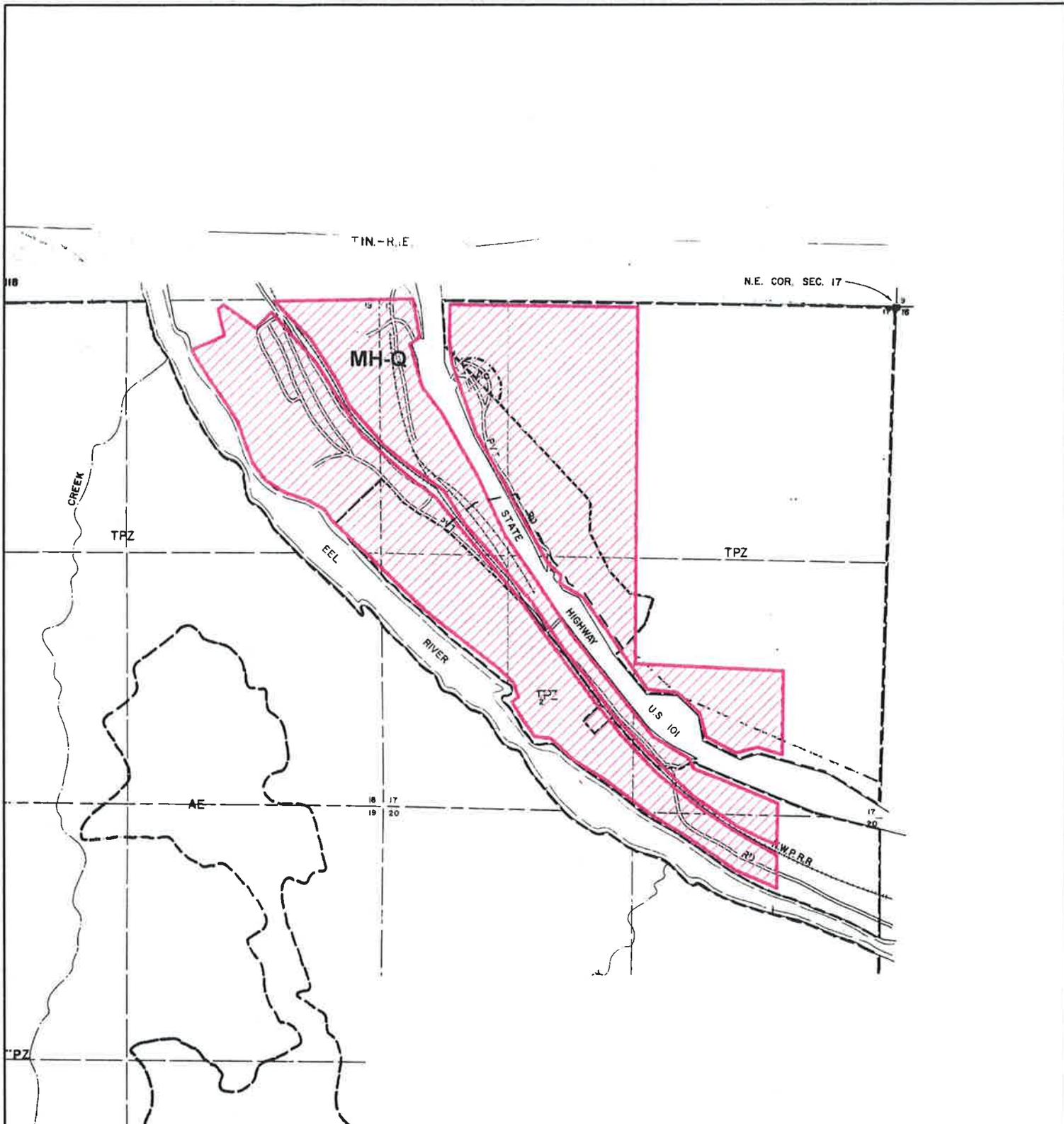
ZONING MAP

**PROPOSED HUMBOLDT REDWOOD COMPANY
 CONDITIONAL USE PERMIT
 SCOTIA AREA
 CUP-13-013
 APN: 205-351-030
 T01N R01E S5, 7-8, 17-18, 20 HB&M (Scotia)**

PROJECT AREA = 



MAP NOT TO SCALE



ZONING MAP

**PROPOSED HUMBOLDT REDWOOD COMPANY
 CONDITIONAL USE PERMIT
 SCOTIA AREA
 CUP-13-013
 APN: 205-351-030
 T01N R01E S5, 7-8, 17-18, 20 HB&M (Scotia)**

PROJECT AREA = 



MAP NOT TO SCALE

ASSESSOR'S PARCEL MAP
 1. THIS MAP WAS PREPARED FOR
 2. THE COUNTY OF HUMBOLDT FOR
 3. THE RECORD OF THE DATA FROM
 4. A SURVEY OF THE LOCAL UNIT AND
 5. CONFORMS WITH LOCAL LAWS AND
 6. REGULATIONS AND THE STATE
 7. OF HUMBOLDT SITE ORDINANCES

SEC 8 & PTN SECS 5,7,17,18 & 20 T1N, R1E HB&M. 205-35

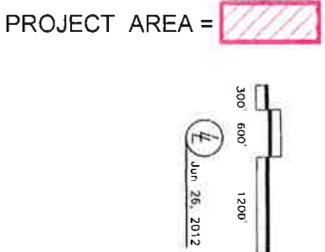
Length	Bearing
1) 81.84'	N87°13'37"W
2) 17.24'	N83°54'52"E
3) 86.02'	S87°03'07"W
4) 31.8'	S84°11'00"W
5) 23.96'	N44°54'50"W
6) 64.31'	N07°34'47"E
7) 62.17'	N12°01'32"W
8) 108.56'	N12°01'32"W
9) 141.54'	N07°03'07"E
10) 132.07'	N08°27'42"E
11) 55.04'	N07°03'07"E
12) 500.11'	S07°15'11"E
13) 131.37'	N07°03'07"E
14) 125.64'	N07°17'08"E
15) 36.87'	N08°01'38"E
16) 162.06'	N05°06'53"W
17) 131.37'	N07°03'07"E
18) 43.8'	N07°03'07"E
19) 138.83'	N07°03'07"E
20) 70.85'	S71°33'41"E
21) 131.84'	S75°53'03"E
22) 145.59'	S10°13'06"W
23) 84.03'	S07°41'42"W
24) 140.7'	S01°45'23"W
25) 74.6'	N08°14'31"W
26) 16.22'	S09°27'05"W
27) 23.47'	S08°01'48"E
28) 66.02'	S10°28'50"E
29) 94.16'	S07°42'10"E
30) 59.87'	S07°15'32"W
31) 143.08'	S72°10'06"W
32) 308.42'	S17°17'40"W
33) 2077.18'	S1°14'34" A=35333"
34) 103.75'	S89°00'00"W

RS, BK 52 of survey, Pg 25
 RS, BK 59 of survey, Pg 124
 RS, BK 63 of survey, Pg 71
 RS, BK 65 of survey, Pgs 59-60
 RS, BK 68 of survey, Pgs 16-20

NOTE - Assessor's Block Numbers Shown in Ellipses
 Assessor's Parcel Numbers Shown in Circles

Assessor's Map Bk. 205, Pg.35
 County of Humboldt, CA.

APN	SER	SER
205-351-010	853-12-14	Fig. 4
205-351-011	853-12-14	Fig. 1
205-351-012	853-12-15	Fig. 2
205-351-013	853-12-15	Fig. 3
205-351-014	853-12-15	Fig. 4
205-351-015	853-12-16A	Fig. 3

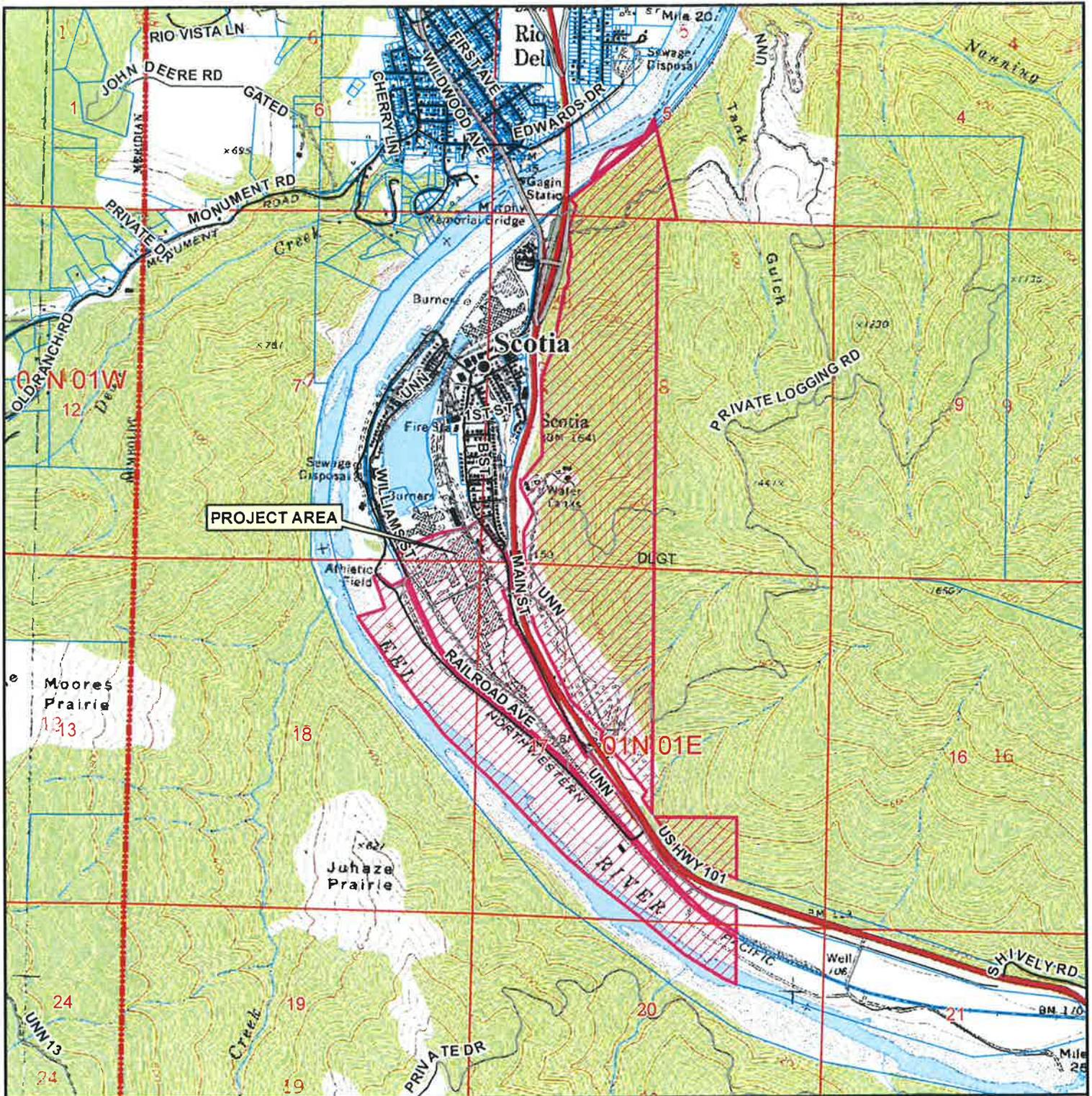


ASSESSOR PARCEL MAP

**PROPOSED HUMBOLDT REDWOOD COMPANY
 CONDITIONAL USE PERMIT
 SCOTIA AREA
 CUP-13-013
 APN: 205-351-030
 T01N R01E S5, 7-8, 17-18, 20 HB&M (Scotia)**



MAP NOT TO SCALE



TOPO MAP

**PROPOSED HUMBOLDT REDWOOD COMPANY
CONDITIONAL USE PERMIT**

SCOTIA AREA

CUP-13-013

APN: 205-351-030

T01N R01E S5, 7-8, 17-18, 20 HB&M (Scotia)

Project Area = 

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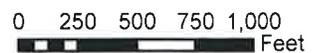


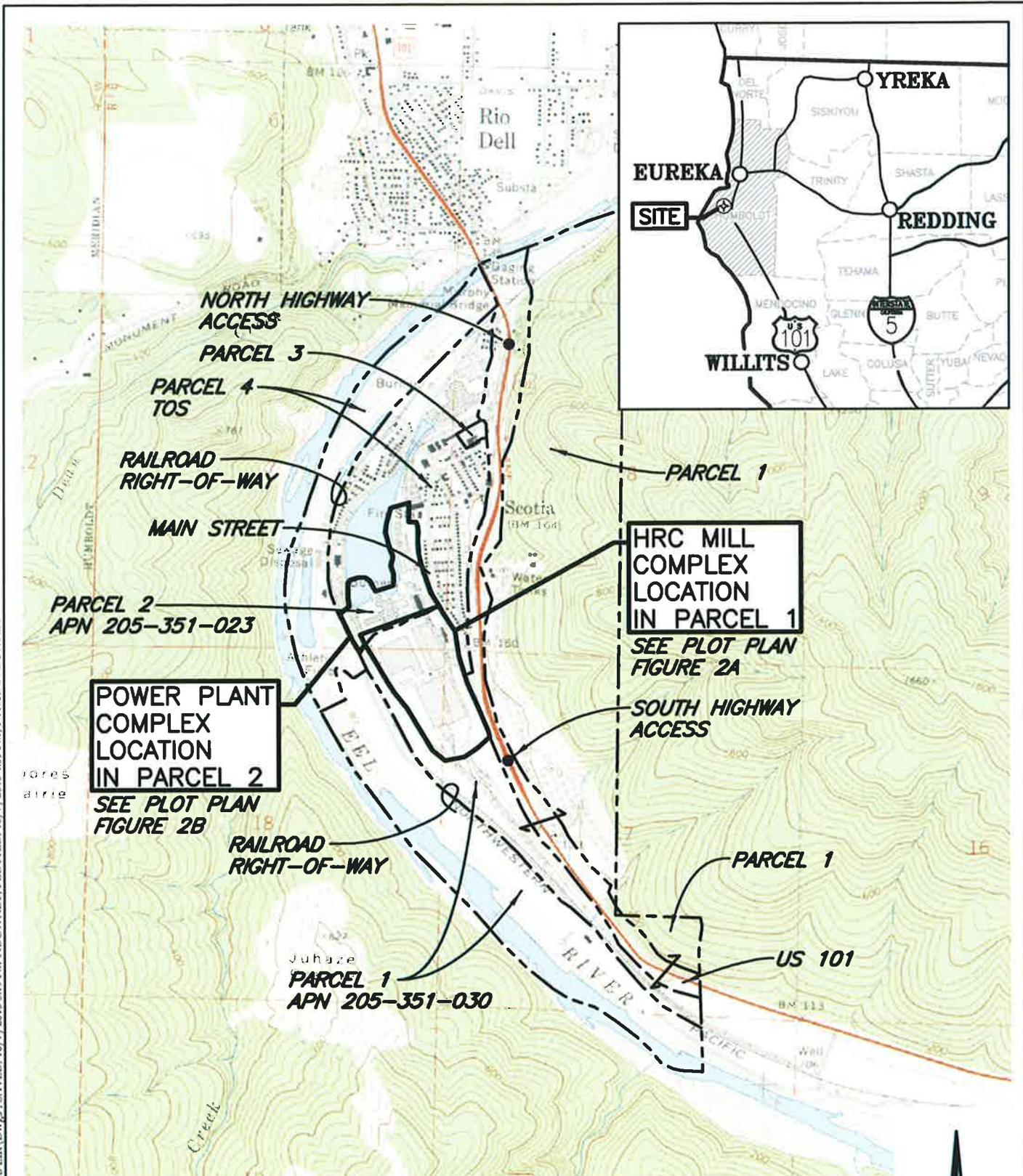
AERIAL MAP
PROPOSED HUMBOLDT REDWOOD COMPANY
CONDITIONAL USE PERMIT
SCOTIA AREA
CUP-13-013
APN: 205-351-030
T01N R01E S5, 7-8, 17-18, 20 HB&M (Scotia)

Subject Parcel = 



This map is intended for display purposes and should not be used for precise measurement or navigation. Data has not been completely checked for accuracy.





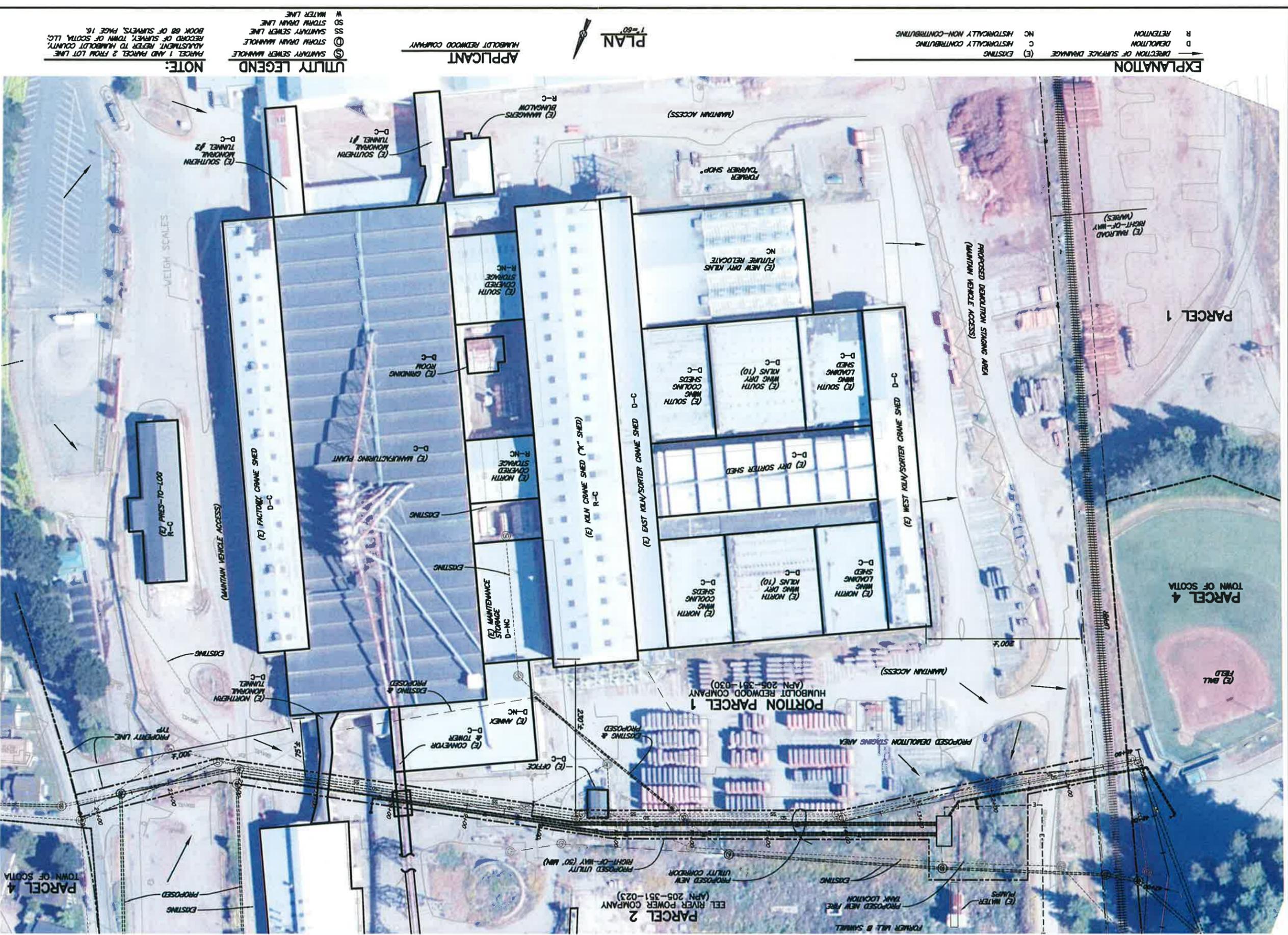
**SOURCE: SCOTIA USGS
7.5 MINUTE QUADRANGLE**

**APPLICANT
HUMBOLDT REDWOOD COMPANY
APN 205-351-030 AND
APN 205-351-023**



\\Eureka\Projects\2014\014185-HRC-Demo-EIR\Dwgs...SAVED: 10/7/2015 3:19 PM NDOWNEY, PLOTTED: 10/7/2015 4:35 PM, NATHAN DOWNEY

	Humboldt Redwood Company Scotia Operations Demolition Project Scotia, California	Site Location Map SHN 014185
	October 2015	014185-SITE-LCTN



EXPLANATION

R D DEMOLITION
 R D RETENTION

(E) EXISTING
 C HISTORICALLY CONTRIBUTING
 NC HISTORICALLY NON-CONTRIBUTING

→ DIRECTION OF SURFACE DRAINAGE

APPLICANT
 HUMBOLDT REDWOOD COMPANY

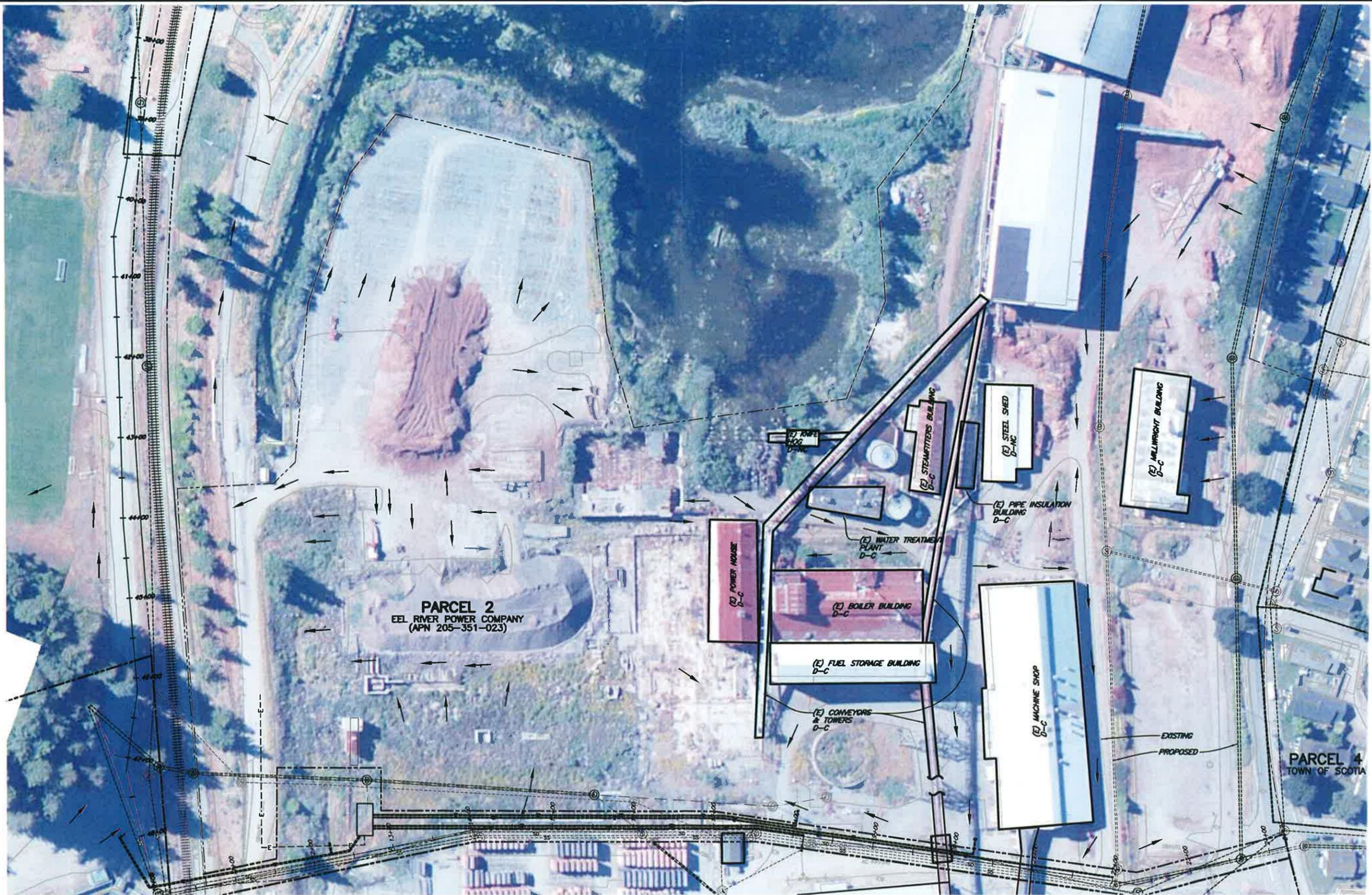
UTILITY LEGEND

⊙ SANITARY SEWER MAINHOLE
 ⊙ STORM DRAIN MAINHOLE
 ⊙ STORM DRAIN LINE
 ⊙ SANITARY SEWER LINE
 ⊙ WATER LINE

NOTE:
 PARCELS 1 AND PARCEL 2 FROM LOT LINE ADJUSTMENT REFER TO HUMBOLDT COUNTY RECORD OF SURVEY, TOWN OF SCOTIA, LLC, BOOK 88 OF SURVEYS, PAGE 16.

DRAWING		DATE		SHT		PROJ. NO.	
2A		11/2016		-		014185	
HUMBOLDT REDWOOD COMPANY SCOTIA OPERATIONS DEMOLITION PROJECT SCOTIA, CALIFORNIA PLOT PLAN HRC MILL COMPLEX							
DESIGN	DR	ME	CDN	CHK	ME	APPRO	
NO.	DATE	REVISION	BY				
S&W CONSULTING ENGINEERS & GEOLOGISTS, INC. 812 W. WABASH EUREKA, CA 95501 FAX (707)441-8855 (707)441-8877							
VERIFY SCALES BAR IS ONE INCH ON ORIGINAL DRAWING 0 1 1'							

SAVED: 7/11/2016 2:26 PM NODDNEY, PLOTTED: 11/14/2016 3:06 PM NATHAN DOWNEY
 LEUREKA PROJECTS\2014\014185-HRC-DEM-D-EP\DWG\014185-HRC-PLAN-16.DWG



EXPLANATION

- | | | | |
|---|-------------------------------|-----|-------------------------------|
| ← | DIRECTION OF SURFACE DRAINAGE | (E) | EXISTING |
| D | DEMOLITION | C | HISTORICALLY CONTRIBUTING |
| R | RETENTION | NC | HISTORICALLY NON-CONTRIBUTING |

PLAN
1"=60'



APPLICANT

HUMBOLDT REDWOOD COMPANY

UTILITY LEGEND

- ⊕ SANITARY SEWER MANHOLE
- ⊙ STORM DRAIN MANHOLE
- SS SANITARY SEWER LINE
- SD STORM DRAIN LINE
- W WATER LINE

NOTE:

PARCEL 1 AND PARCEL 2 FROM LOT LINE ADJUSTMENT. REFER TO HUMBOLDT COUNTY RECORD OF SURVEY, TOWN OF SCOTIA, LLC; BOOK 68 OF SURVEYS, PAGE 16.

VERIFY SCALES
 BAR IS ONE INCH ON ORIGINAL DRAWING
 0 1" IF NOT ONE INCH ON THIS SHEET, ADJUST SCALES ACCORDINGLY

CONSULTING ENGINEERS & GEOLOGISTS, INC.
 812 W. WABASH
 EUREKA, CA 95501
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 FAX (707)441-8877



DSGN	MEL	DR	CON	CHK	MEL	APVD	NO.	DATE	REVISION	BY

HUMBOLDT REDWOOD COMPANY
 SCOTIA OPERATIONS DEMOLITION PROJECT
 SCOTIA, CALIFORNIA
PLOT PLAN
POWER PLANT COMPLEX

DRAWING
2B

SHT
 DATE 11/2016
 PROJ. NO.
 014185

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 ($\$33/\text{sf} \times 100,000 \text{ sf} = \$3,300,000$; $\$41/\text{sf} \times 100,000 \text{ sf} = \$4,100,000$). 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 econom-

ic 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 histori-

cal 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 non-existent 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.

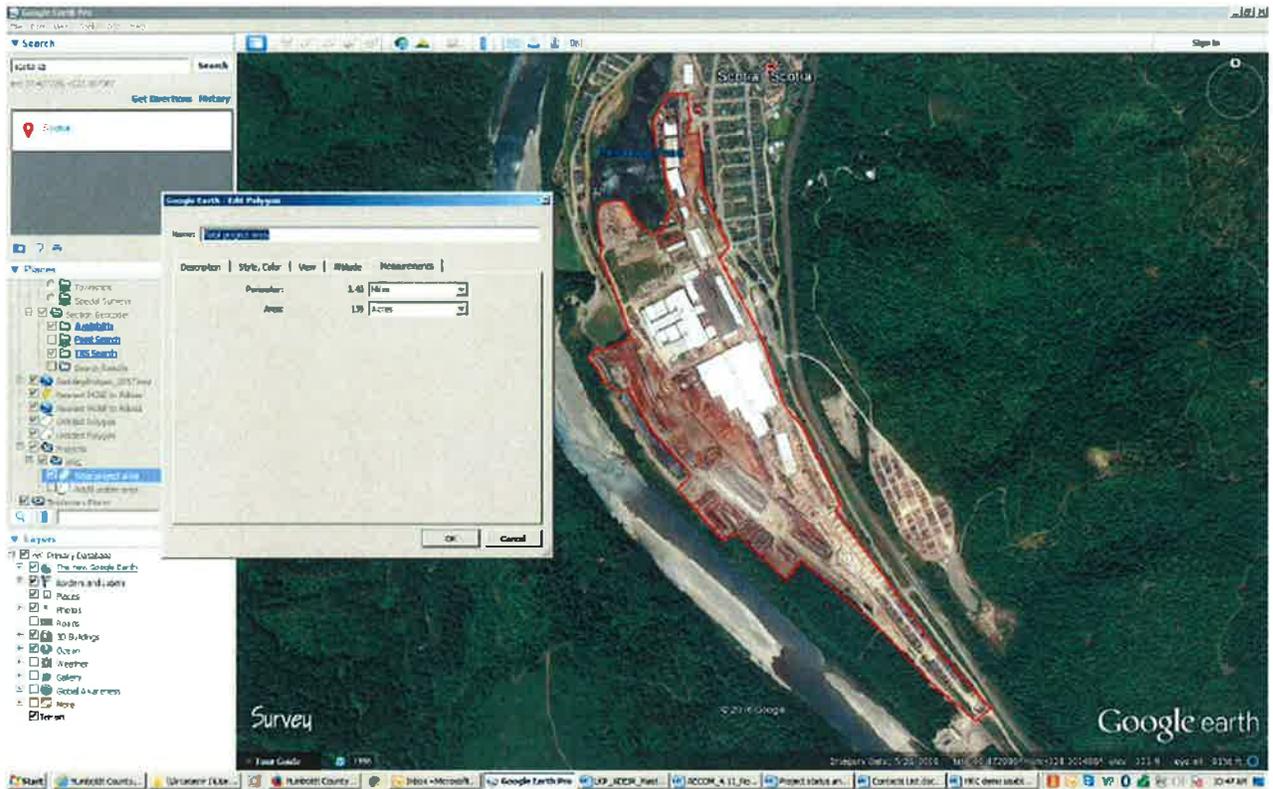
The following statement identifies why, in the County's judgment, the benefits of the Project will outweigh its unavoidable significant effects. Any one of these reasons is sufficient to justify approval of the Project. The substantial evidence supporting the various benefits can be found in the preceding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

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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	Compliance Verification Comments
<p>Cultural Resources</p> <p>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 per agencies. Recordation shall also include:</p> <ol style="list-style-type: none"> 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. <p>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 municipalities to increase interest in Scotia's history and culture and take advantage of historic preservation programming.</p> <p>CUL-3. Interpretive Display. HRC will develop a display of the photographs and documentation for public exhibition.</p> <p>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.</p> <p>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.</p> <p>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 70505). 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).</p>	<p>Prior to deconstruction activities</p> <p>Archival data and information to be collected prior to deconstruction activities</p>	<p>County of Humboldt</p> <p>County of Humboldt</p> <p>County of Humboldt</p> <p>HRC, contractors, County of Humboldt</p> <p>HRC, contractors, County of Humboldt</p> <p>HRC, contractors, County of Humboldt</p>	<p>Complete recordation prior to deconstruction activities</p> <p>Complete archival data collection prior to start of deconstruction activities</p> <p>Prior to deconstruction activities</p> <p>Prior to deconstruction activities</p> <p>Prior to deconstruction activities</p> <p>Ongoing throughout project implementation</p> <p>Ongoing throughout project implementation</p>	<p>Documentation of recordation provided to County of Humboldt by Humboldt Redwood Company (HRC)</p> <p>Documentation of archival work provided to County of Humboldt by HRC</p> <p>Documentation of interpretive display provided to County of Humboldt by HRC</p> <p>Documentation of salvage provided to County of Humboldt by HRC</p> <p>Continual observation by all parties involved</p> <p>Continual observation by all parties involved</p>		



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
<p>Mitigation Measure</p> <p>Public Resources Code, Section 50977). 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 50977.99. Work may resume if NAHC is unable to identify a descendant or the descendant failed to make a recommendation.</p> <p>Aesthetics</p> <p>AE5-1: 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.</p>	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		
<p>Air Quality</p> <p>AIR-1: Fugitive Dust. To mitigate potential impacts to air quality during the project, the following mitigation measures should be applied:</p> <p>AIR-1a. All active deconstruction areas shall be watered at a rate sufficient to keep soil moist and prevent formation of wind-blown dust.</p> <p>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 fenderboard.</p> <p>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.</p> <p>AIR-1d. All paved access roads, parking areas, and deconstruction staging areas shall be cleaned daily with water sweepers during construction.</p> <p>AIR-1e. If visible soil is carried out onto adjacent streets, the area shall be washed with water or by a water sweeper truck.</p> <p>AIR-1f. Hydrosedding or non-toxic soil stabilizers shall be applied to inactive construction areas (previously graded areas inactive for 10 days or more).</p> <p>AIR-1g. Exposed stockpiles of dirt, sand, and similar material shall be enclosed, covered, watered daily, or treated with non-toxic soil binders.</p> <p>AIR-1h. Traffic speeds on unpaved roads shall be limited to 10 miles per hour.</p> <p>AIR-1i. Vegetation in disturbed areas shall be replanted as quickly as possible.</p> <p>AIR-1j. Outdoor dust-producing activities shall be suspended when high winds create visible dust plumes in spite of control measures.</p> <p>Hazards and Hazardous Materials</p> <p>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 <i>Soil and Groundwater Management Contingency Plan-Former PALCO Mill B, Scotia, California, Case No. TNH1857 (SHN, February 2013)</i> 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.</p>	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		
	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 (SCMCP), 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	Compliance Verification Date	Compliance Verification Comments
<p>Biological Resources</p> <p>BIO-1. Seasonal Restrictions. To avoid direct and indirect impacts to nesting barn swallows (<i>Hirundo rustica</i>), violet-green swallows (<i>Tachycineta thalassina</i>), Townsend's big-eared bats (<i>Corynorhinus townsendii</i>), and pallid bats (<i>Artibeus pallidus</i>) 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.</p> <p>Demolition activities at the following structures will be limited to the period between September 16 and February 28:</p> <ul style="list-style-type: none"> • 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 <p>Demolition activities at the following structures will be limited to the period between September 1 and February 28:</p> <ul style="list-style-type: none"> • Southern Monorail Tunnel #1 • Manufacturing Plant 	Seasonally during project implementation	HRC, contractors, County of Humboldt	Ongoing for duration of project	<p>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 SCMCP.</p> <p>Continual observation by all parties involved, and making any changes to project activities or operating guidelines, as warranted to achieve mitigation measure</p>			

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	Compliance Verification Date	Compliance Verification Comments
<ul style="list-style-type: none"> • Factory Crane Shed • Southern Monorail Tunnel #2 • Maintenance Storage • Annex <p>Demolition activities at the following structures will be limited to the period between August 16 and May 14:</p> <ul style="list-style-type: none"> • Dry Sorrier Shed • Machine Shop • Millwright Building • Steel Shed • Pipe Insulation Building • Steamfitters Building • Water Treatment Plant • Powerhouse • Fuel Storage Building <p>No seasonal restriction is necessary at the following structures:</p> <ul style="list-style-type: none"> • Office • Grinding Room • Knife Hog • Boiler Building <p>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.</p> <p>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.</p>	<p>Prior to demolition of structures</p>	<p>County of Humboldt</p>	<p>Ongoing during project implementation</p>	<p>CDFW approval</p>			

ATTACHMENT 1 CONDITIONS OF APPROVAL

APPROVAL OF THE CONDITIONAL USE PERMIT IS CONDITIONED ON THE FOLLOWING TERMS AND REQUIREMENTS:

1. The applicant shall obtain all necessary Building Permits for demolition of structures from the Building Inspection Division (BID).
2. The applicant shall obtain all necessary permits from the Division of Environmental Health (DEH).
3. The applicant shall implement the mitigation and monitoring requirements of the Environmental Impact Report.
5. This project is required to pay for permit processing on a time and material basis as set forth in the schedule of fees and charges as adopted by ordinance of the Humboldt County Board of Supervisors. Any and all outstanding Planning fees to cover the processing of the subdivision shall be paid to the Humboldt County Planning Division, 3015 "H" Street, Eureka. The Department will provide a bill to the applicant upon file close out after the Planning Commission decision.
6. **Prior to hearing**, the applicant shall submit a check to the Planning Division payable to the Humboldt County Recorder in the amount of \$3,128.25. Pursuant to Section 711.4 of the Fish and Game Code, the amount includes the Department of Fish and Wildlife (DF&W) fee plus a \$50 document handling fee. This fee is effective through December 31, 2017, at such time the fee will be adjusted pursuant to Section 713 of the Fish and Game Code.

Informational Notes:

1. If buried archaeological or historical resources are encountered during construction activities, the contractor on-site shall call all work in the immediate area to halt temporarily, and a qualified archaeologist is to be contacted to evaluate the materials. Prehistoric materials may include obsidian or chert flakes, tools, locally darkened midden soils, groundstone artifacts, dietary bone, and human burials. If human burial is found during construction, state law requires that the County Coroner be contacted immediately. If the remains are found to be those of a Native American, the California Native American Heritage Commission will then be contacted by the Coroner to determine appropriate treatment of the remains. The applicant is ultimately responsible for ensuring compliance with this condition.
2. Applicant is responsible for receiving all necessary permits and/or approvals from other state and local agencies.
3. The Conditional Use Permit shall expire and become null and void at the expiration of one (1) year after all appeal periods have lapsed (see "Effective Date"); except where construction under a valid building permit or use in reliance on the permit has commenced prior to such anniversary date. The period within which construction or use must be commenced may be extended as provided by §A315-24 of the Humboldt County Code.

ATTACHMENT 2
Staff Analysis of the Evidence Supporting the Required Findings

Required Findings: To approve this project, the Planning Commission must determine that the applicants have submitted evidence in support of making **all** of the following required findings.

Required Findings for Conditional Use Permit

The Zoning Ordinance, Section 312-17.1 of the Humboldt County Code (Required Findings for All Discretionary Permits) specifies the findings that are required to grant a Special Permit:

1. The proposed development is in conformance with the General Plan; and
2. That the use is consistent with the purposes of the zone in which the site is located; and
3. The proposed development conforms with all applicable standards and requirements of these regulations; and
4. That the proposed location of the use and conditions under which it may be operated or maintained will not be detrimental to the public health, safety, or welfare, or materially injurious to properties or improvements in the vicinity.
5. Finally, the California Environmental Quality Act (CEQA) states that one of the following findings must be made prior to approval of any development which is subject to the regulations of CEQA.
 - a) The project either is categorically or statutorily exempt; or
 - b) There is no substantial evidence that the project will have a significant effect on the environment or any potential impacts have been mitigated to a level of insignificance and a negative declaration has been prepared pursuant to Section 15070 of the CEQA Guidelines; or
 - c) An negative declaration has been prepared and all significant environmental effects have been eliminated or mitigated to a level of insignificance, or the required findings in Section 15091 of the CEQA Guidelines are made.
6. Required Findings – Impact on Residential Density

In addition, Section 65863 of the California Government Code requires counties and cities to ensure through its housing element inventory or housing program that adequate sites are available to accommodate the jurisdiction's share of the regional housing need for the planning period of the adopted Housing Element, and requires the following finding to be made:

- a) The proposed development does not reduce the residential density for any parcel below that utilized by the Department of Housing and Community Development in determining compliance with housing element law (the mid-point of the density range specified in the plan designation) unless the following written findings are made supported by substantial evidence: 1) the reduction is consistent with the adopted general plan including the housing element; and 2) the remaining sites identified in the housing element are adequate to accommodate the County share of the regional housing need; and 3) the property contains insurmountable physical or environmental limitations and clustering of residential units on the developable portions of the site has been maximized.

Staff Analysis:

1. General Plan Consistency: The following section identifies the evidence which supports finding that the proposed project is in conformance with all applicable policies and standards in found in the Humboldt County General Plan.

Plan Section	Summary of Applicable Goal, Policy or Standard	Evidence Which Supports Making the General Plan Conformance Finding
Land Use §2721 (FRWK)	Industrial General (IG). Sites with convenient access to transportation systems and full range of urban services. Primary and Compatible uses: Manufacturing, processing wood, iron, concrete products. Density: minimum parcel size adequate for proposed uses.	The project involves demolition of a number of outdated structures previously used in processing timber products. Their removal will allow for a more efficient flow of materials and processing consistent with current operational requirements. The project will not result in change of density.
Cultural Resources §3500 (FRWK)	Protect cultural resources, including historic, archaeological, and scenic resources.	Archeological records checks and surveys have been conducted within the assessment area in for preparation of the Environmental Impact Report. Alternatives and mitigation measures are included for addressing potential impacts to historic resources.
Housing §2400 (FRWK)	Encourage innovative designs that facilitate optimum use of sites.	The project does not involve residential development.
Geologic Hazards §3210 (FRWK)	Goals: To reduce public exposure to natural and manmade hazards. To ensure the continuity of vital services and functions. To educate the community. Policy: Regulate land use to ensure that development in potentially hazardous areas will not preclude preserving and promoting public safety. Standards: Require geologic reports according to the Geologic Hazards Land Use Matrix as denoted in the Framework Plan.	The site is not within a mapped Alquist-Priolo Fault Hazard Zone, and no residential development is proposed.

<p>Hazards §3200 (FRWK)</p> <p>Flood §3220 (FRWK)</p> <p>Fire Hazards §3230 (FRWK)</p>	<p>New development shall minimize risk to life and property in areas of high flood and fire hazards.</p>	<p>According to the Flood Insurance Rate Maps, the project area is partially located in Flood Zone "A", areas of 100-year flood, including the project site. However, no new structures for human occupancy are proposed. The project site is not within a mapped dam or levee inundation area and, at ± 20 miles distance from the coast, is outside the areas subject to tsunami run-up.</p> <p>The subject property is located within the Scotia Community Services District for fire protection. The District has expressed concerns that a number of the structures proposed for demolitions are extreme hazards for fire safety and unsafe for entry in the event of a fire.</p>
<p>Noise §3240 (FRWK)</p>	<p>Conform with noise standards.</p>	<p>The subject parcel is not located in an area that requires special noise attenuation measures. The project as proposed and conditioned is not expected to generate significant noise levels. The demolition of structures will only be a temporary project.</p>
<p>Biological Resources §3400 (FRWK)</p>	<p>Goal: To maximize where feasible, the long term public and economic benefits from the biological resources within the County by maintaining and restoring fish and wildlife habitats.</p> <p>Policies: Maintain values of significantly important habitat areas by assuring compatible adjacent land uses, where feasible.</p>	<p>Human presence and restoration activities may have the effect of disturbing some wildlife during implementation of restoration work. There is the potential for impacts on some bat species resulting from the project activities. Mitigation measures are included in the EIR to address this potential impact. The project vicinity is already developed for industrial uses. Wildlife species are relatively quick to acclimate to surrounding activities. Therefore, it is assumed that other wildlife living in the area have already adapted to existing disturbances and would not be further disturbed by this project.</p>

2. & 3. Zoning Consistency and Standards. The following table identifies the evidence, which supports findings that the proposed surface mining operation is consistent with all applicable requirements and standards of the County Zoning Regulations.

Zoning Section	Requirement Summary	Supporting Evidence
Heavy Industrial (MH/Q)	Allows for industrial manufacturing uses.	The property is currently used for timber products manufacturing, and demolition of outdated structures will serve to increase the efficiency of current day manufacturing processes.
Minimum Parcel Size	20 – 160 acres	The project does not involve land division.
Minimum Lot Width	100 feet	The project does not involve land division.
Minimum Yard Setbacks	Front 30 feet Rear 20 feet Side 10% lot width	The project does not involve construction of any new structures.
Minimum distance b/w major buildings	20 feet	N/A
Maximum Lot Coverage	35%	N/A

Zoning Section	Requirement Summary	Supporting Evidence
Qualifying (Q) Combining Zone	Provides that any structure that is determined to be an "historical resource" as defined in paragraph (a) of Section 15064.5 of Title 14, Chapter 3 of the California Code of Regulations shall not be subjected to substantial adverse change, including demolition, destruction, relocation, or alteration of the structure or immediate surrounding such that the significance of an historical resource would be materially impaired. A Conditional Use Permit is required for a use not able to meet above the development restriction.	The project is a Conditional Use Permit as required under the Q combining zone development restriction. The discretionary permit also triggers CEQA review and demolition of contributing historic structures has been determined by precedent cases to require preparation of an Environmental Impact Report.

4. Public Health, Safety, or Welfare:

Evidence and Discussion: The Department finds that the proposed project will not be detrimental to the public health, safety and welfare since all reviewing referral agencies have approved or conditionally approved the proposed project design. The project as proposed and conditioned is consistent with the general plan and zoning ordinances; and the proposed project will not cause significant environmental damage.

5. Environmental Impact: The following table identifies the evidence which supports finding that the proposed location of the use and conditions under which it may be operated or maintained will not be detrimental to the public health, safety or welfare, or materially injurious to properties or improvements in the vicinity, and will not adversely impact the environment.

Code Section	Summary of Applicable Requirement	Evidence that Supports the Required Finding
CEQA §15063	CEQA review required	Please see the attached proposed Final Environmental Impact Report The environmental document on file in the Department includes a detailed discussion of all relevant environmental issues.

6. Impact on Residential Density Target: The following table identifies the evidence which supports finding that the proposed project will not reduce the residential density for any parcel below that utilized by the Department of Housing and Community Development in determining compliance with housing element law.

Code Section	Summary of Applicable Requirement	Evidence that Supports the Required Finding
312-17.1.5 Housing Element Densities	The proposed development does not reduce the residential density for any parcel below that utilized by the Department of Housing and Community Development in determining compliance with housing element law (the mid point of the density range specified in the plan designation), except where: 1) the reduction is consistent with the adopted general plan including the housing element; and 2) the remaining sites identified in the housing element are adequate to accommodate the County share of the regional housing need; and 3) the property contains insurmountable physical or environmental limitations and clustering of residential units on the developable portions of the site has been maximized.	The project does not impact housing element densities as the project does not involve residential structures or uses. The proposed will not add or subtract from the current housing inventory.

ATTACHMENT 3
Applicant's Evidence In Support of the Required Findings

The applicant has submitted the following written evidence in support of making the required findings, and copies of relevant are attached.

Document	Location
Application Form	On file with Planning
Plot Plan Checklist	On file with Planning
Plot Plan	On file with Planning
Project Description	Attached

ATTACHMENT 4
Referral Agency Comments and Recommendation

Referral Agency	Recommendation	Comments	Location
Humboldt County Building Inspection Division	Conditional Approval	Demo permits required	On file with Planning.
Humboldt County Public Works, Land Use Division	The Department has no comments at this time.		On file with Planning.
Humboldt County Division of Environmental Health	Conditional Approval		On file with Planning.
CalFire	Standard Conditions		On file with Planning.
Cal EPA	No Response		
CDFW	No Response	(commented on NOP for EIR)	
NCUAQMD	No Response		
CA Toxic Sub. Control	No Response		
NWIC	Further study	Addressed in EIR	On file with Planning.
Blue Lake Rancheria THPO	Out of area of concern		
Bear River THPO	No Response		
Wiyot THPO	Out of area of concern		

ATTACHMENT 5
Proposed Final Environmental Impact Report
Draft Environmental Impact Report (Previously Provided on CD)

Final Environmental Impact Report

**Humboldt Redwood Company Scotia Operations
Demolition Project, Town of Scotia
(State Clearinghouse No. 2016082033)**

Prepared for:

Humboldt County Planning and Building Department

 **Engineers & Geologists**

812 W. Wabash Ave.
Eureka, CA 95501-2138
707-441-8855

May 2017
014185

Final Environmental Impact Report

Humboldt Redwood Company Scotia Operations Demolition Project, Town of Scotia (State Clearinghouse No. 2016082033)

Prepared for:

Humboldt County Planning and Building Department

Lead Agency:

Humboldt County Planning and Building Department

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May 2017

QA/QC:LKS__

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Abbreviations and Acronyms

AES-#	aesthetics mitigation measure-number
AIR-#	air quality mitigation measure-number
BIO-#	biological resources mitigation measure-number
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CUL-#	cultural resources mitigation measure-number
DEIR	draft environmental impact report
EIR	environmental impact report
HABS	Historic American Buildings Survey
HAER	Historic American Engineering Record
HAZ-#	hazards and hazardous materials mitigation measure-number
HCPBD	Humboldt County Planning and Building Department
HRC	Humboldt Redwood Company
MMRP	mitigation monitoring and reporting program
NAHC	Native American Heritage Commission
PALCO	Pacific Lumber Company
SGMCP	soil and groundwater management contingency plan
SHN	SHN Engineers & Geologists

Chapter 1

Introduction

1.1 Purpose of the Final EIR

This document, together with the draft environmental impact report (Draft EIR or DEIR), is the final environmental impact report (Final EIR) for the Humboldt Redwood Company Scotia Operations Demolition Project (State Clearinghouse Number 2016082033). The DEIR identified the likely environmental consequences of the project and recommended mitigation measures to reduce or eliminate significant impacts. This document responds to public comments on the DEIR, revises the DEIR as necessary, and provides a mitigation monitoring and reporting program (MMRP) for the project.

According to the California Environmental Quality Act (CEQA), lead agencies are required to consult with public agencies having jurisdiction over a proposed project and to provide the general public with an opportunity to comment on the DEIR. For this project, Humboldt County is the lead agency under CEQA. This document has been prepared to respond to comments received on the DEIR and to clarify any errors, omissions, or misinterpretations of the analysis or findings in the DEIR.

This document, together with the DEIR, will constitute the Final EIR at the time Humboldt County certifies the Final EIR as complete and adequate under CEQA.

1.2 Environmental Review Process

The DEIR was made available for public review from March 6 through April 19, 2017. It was available at Humboldt County Planning and Building Department, Planning Division, 3015 H Street, Eureka, CA 95501, and online at: <http://www.humboldt.gov.org/156/Planning-Building>.

During the DEIR's public review period, no comment was received, either by letter or email.

The Final EIR will be presented to the Humboldt County decision-making body at the Board of Supervisors Chamber, Humboldt County Courthouse, 825 Fifth Street, Eureka California 95501. Before acting on the project, the County must certify the Final EIR and adopt the MMRP (see Chapter 4 of this document). In addition, in order to approve Alternative D-Combination of Adaptive Reuse, Relocation, and Stabilization in Place (the Environmentally Superior Alternative) in light of the significant, irreversible impacts to historical resources and aesthetics that would remain significant even after the application of available mitigation measures, the County must make the necessary findings for the adoption of a statement of overriding considerations.

1.3 Report Organization

This document consists of the following chapters:

Chapter 1: Introduction includes a discussion of the purpose and organization of the Final EIR.

Chapter 2: Responses to Comments on Draft EIR provides the comments received during the Draft EIR public review and comment period.

Chapter 3: Draft EIR Text Changes contains corrections or clarifications that have been made based on comments received on the DEIR or for other reasons. The changes show language that has been added to or deleted from the DEIR. Underlined text represents language that has been added to the DEIR; text in strikeout has been deleted from the DEIR.

Chapter 4: Mitigation Monitoring and Reporting Program identifies mitigation measures referenced in the EIR as necessary to avoid or reduce the project's potentially significant impacts and provides a program for implementation and monitoring of these measures. The timing and entity responsible for monitoring are identified.

Chapter 2

Responses to Comments on Draft EIR

No comment was delivered to the lead agency during the Draft EIR public review and comment period (including letters and emails). Therefore, no comment response is necessary.

Chapter 3

Draft EIR Text Changes

No comment was received and the project has not changed since preparation and public circulation of the DEIR, therefore no change is necessary to the DEIR text.

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
				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

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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
<p>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.</p> <p>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.</p>	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	
<p>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.</p> <p>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 <i>Soil and Groundwater Management Contingency Plan-Former PALCO Mill B, Scotia, California, Case No. INH1857</i> (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.</p>	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	
	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	

SWW

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	Compliance Verification 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, observation by all parties involved, and making any changes to project activities or operating guidelines, as warranted to achieve compliance with the SGMCP.		
<p>Biological Resources</p> <p>BIO-1. Seasonal Restrictions. To avoid direct and indirect impacts to nesting barn swallows (<i>Hirundo rustica</i>), violet-green swallows (<i>Tachycineta thalassina</i>), Townsend's big-eared bats (<i>Corynorhinus townsendii</i>), and pallid bats (<i>Antrozous pallidus</i>) 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.</p> <p>Demolition activities at the following structures will be limited to the period between September 16 and February 28:</p> <ul style="list-style-type: none"> • 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 <p>Demolition activities at the following structures will be limited to the period between September 1 and February 28:</p> <ul style="list-style-type: none"> • 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		

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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	Compliance Verification Date
<ul style="list-style-type: none"> • Factory Crane Shed • Southern Monorail Tunnel #2 • Maintenance Storage • Annex <p>Demolition activities at the following structures will be limited to the period between August 16 and May 14:</p> <ul style="list-style-type: none"> • Dry Sorter Shed • Machine Shop • Millwright Building • Steel Shed • Pipe Insulation Building • Steamfitters Building • Water Treatment Plant • Powerhouse • Fuel Storage Building <p>No seasonal restriction is necessary at the following structures:</p> <ul style="list-style-type: none"> • Office • Grinding Room • Knite Hog • Boiler Building <p>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.</p> <p>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.</p>						
	Prior to demolition of structures	County of Humboldt	Ongoing during project implementation	CDFW approval		