COUNTY OF MENDOCINO
DEPARTMENT OF PLANNING AND BUILDING SERVICES
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MEMORANDUM

DATE: SEPTEMBER 17, 2024

TO: COASTAL PERMIT ADMINISTRATOR

FROM: LIAM CROWLEY, PLANNER II

SUBJECT: CDP_2024-0015 (SAVE THE REDWOODS LEAGUE)

CDFW Environmental Document Filing Fee: A Mitigated Negative Declaration was prepared for this project. For such projects, California Department of Fish & Wildlife (CDFW) imposes and collects an environmental document filing fee to defray the costs of managing and protecting California's fish and wildlife resources, including consultation with other agencies, reviewing environmental documents recommending mitigation measures, and developing monitoring programs.

This fee is due upon approval of the project but was mistakenly left out of the recommended conditions of approval by staff. Therefore, this memo is a recommendation that the following language be added as condition of approval number twenty-two (#22) within this Coastal Development Permit to memorialize CDFWs Environmental Document Filing Fee requirements:

> *22. This entitlement does not become effective or operative and no work shall be commenced under this entitlement until the California Department of Fish and Wildlife filing fees required or authorized by Section 711.4 of the Fish and Game Code are submitted to the Mendocino County Department of Planning and Building Services. Said fee of $2,966.75 or current fee shall be made payable to the Mendocino County Clerk and submitted to the Department of Planning and Building Services within five (5) days of the end of any appeal period. Any waiver of the fee shall be on a form issued by the Department of Fish and Wildlife upon their finding that the Project has "no effect" on the environment. If the Project is appealed, the payment will be held by the Department of Planning and Building Services until the appeal is decided. Depending on the outcome of the appeal, the payment will either be filed with the County Clerk (if the Project is approved) or returned to the payer (if the Project is denied). Failure to pay this fee by the specified deadline shall result in the entitlement becoming null and void.* ***The applicant has the sole responsibility to ensure timely compliance with this condition.***

A redline version of the recommended findings and conditions of approval is attached showing the recommended changes in context. The proposed condition of approval number twenty-two (#22) is not a mitigation measure within the meaning of CEQA. Rather, this condition would memorialize and existing administrative requirement.

Hazardous Materials: On September 4, 2024, staff received comments from the Department of Toxic Substances Control (see attached). DTSC recommended testing any imported soil and fill material for contaminants and surveying buildings to be demolished for lead, mercury, asbestos, and polychlorinated biphenyl caulk (PCBs). No soil or fill would be imported as part of the proposed development. The applicant provided a copy of asbestos and lead-based paint surveys that were conducted on the property in 2023 and 2017, respectively. The barrack structure contains both asbestos and lead-based paint. The asbestos survey recommended that a CSLB Licensed Contractor with a C-22 asbestos abatement endorsement and DOSH registration conduct the removal and/or abatement of the asbestos-containing materials. The lead-based paint survey noted the applicable regulations and recommended that demolition of lead containing materials be conducted with the materials kept in a wetted stair and removed in sections to reduce the potential for airborne lead emissions.

Mercury-containing products exhibit hazardous characteristics and are classified as "universal waste" by DTSC. Mercury may be present in thermometers, toys, barometers, blood pressure gauges, button cell batteries, fluorescent bulbs and tubes, or other products. As universal waste, mercury-containing products cannot be disposed in a landfill. The Mendocino

County HAZ-MOBILE is available for disposal of mercury-containing products and other hazardous wastes through the Mendocino Waste Management Authority.

According to the EPA, caulk containing potentially harmful polychlorinated biphenyls (PCBs) was used in many buildings in the 1950s through the 1970s. PCB caulk was commonly used to seal the joints of brick, masonry, stone, and metal window frames. Based on information provided in the Archaeological Survey Report and Historic Resource Evaluation prepared for the project, it seems the barrack structure was built prior to 1950 as a World War II surplus building. The only modifications to the building included a wooden entryway and utility lines for water, gas, and electric service. Therefore, it seems unlikely that the building would contain PCB caulk.

Staff recommends that condition of approval number twenty-one (#21) be replaced with a more effective condition that includes the recommendations contained in the lead-based paint survey, asbestos survey, and comments from DTSC in addition to the existing requirements.

Condition number twenty-one (#21) is the same as mitigation measure AQ-1 within the proposed Mitigated Negative Declaration. Therefore, staff recommends that mitigation measure AQ-1 be deleted and replaced with a more effective mitigation measure that mirrors condition of approval #21 in accordance with CEQA Guidelines Section 15074.1. Per CEQA Guidelines Section 15074.1(b)(2), this new measure would be more effective in mitigating potential hazardous material emissions because in addition to asbestos, it would require additional surveying for mercury-containing products and PCBs, as well as incorporate recommended avoidance measures to prevent the emission of lead-based paints known to be present on the site. Because the newly substituted mitigation measure would be identical to condition of approval number twenty-one (#21), CEQA Guidelines Section 15074.1(c) would be satisfied, and the Mitigated Negative Declaration need not be recirculated.

A redline version of the recommended findings, conditions of approval, and Mitigation Monitoring and Reporting Program (MMRP) is attached showing the substituted mitigation measure in context.

Attachments:

1. Redline findings and conditions of approval
2. Redline MMRP
3. DTSC Comments
4. Lead in Paint Inspection Report
5. Limited Asbestos Bulk Materials Survey Report

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FINAL FINDINGS AND CONDITIONS OF APPROVAL
CASE# CDP_2024-0015 - SAVE THE REDWOODS LEAGUE

FINDINGS:

1. Pursuant to MCC Section 20.532.095(A)(1), the proposed project to demolish and remove an existing barrack structure, remove overhead electrical lines and associated panels, and install 315± linear feet of buried electrical conduit and associated electrical panels is in conformity with the certified local coastal program. As described in this staff report, the project is consistent with the intent of the FL land use classification and TP zoning district, would incorporate BMPs to reduce erosion and sedimentation, would not substantially degrade ESHA, is not within a hazard area or Highly Scenic Area, is served by adequate utilities, would not impact cultural resources, and does not warrant the provision of any new public access easements; and

2. Pursuant to MCC Section 20.532.095(A)(2), the proposed development to demolish and remove an existing barrack structure, remove overhead electrical lines and associated panels, and install 315± linear feet of buried electrical conduit and associated electrical panels will be provided with adequate utilities, access roads, drainage, and other necessary facilities. Water supply and sewage capacity are not required for the project because it does not involve the construction of any new dwellings or plumbing. The new electrical infrastructure is intended to restore electrical service to an existing structure that would be lost due to the demolition of another structure. The existing private access road between State Route 1 and the site is sufficient to serve the development because the density and intensity of use would not change. BMPs implanted during construction would ensure that proper drainage is available. After construction, disturbed soil would be restored and revegetated. Demolition of the barrack structure would increase pervious surface area, lessening runoff; and

3. Pursuant to MCC Section 20.532.095(A)(3), the proposed development to demolish and remove an existing barrack structure, remove overhead electrical lines and associated panels, and install 315± linear feet of buried electrical conduit and associated electrical panels is consistent with the purpose and intent of the zoning district applicable to the property, as well as the provisions of this Division and preserve the integrity of the zoning district. The project would not result in timberland being converted to non-timber use because tree removal would not occur. New uses would not be established; and

4. Pursuant to MCC Section 20.532.095(A)(4), the proposed development to demolish and remove an existing barrack structure, remove overhead electrical lines and associated panels, and install 315± linear feet of buried electrical conduit and associated electrical panels, if completed in compliance with the conditions of approval, will not have any significant adverse impacts on the environment within the meaning of the California Environmental Quality Act. A mitigated negative declaration has been prepared. Adoption and implementation of the mitigation measures would ensure that impacts are less than significant. A mitigation monitoring and reporting program has been prepared to outline the implementation of mitigation measures and show they are feasible and enforceable; and

5. Pursuant to MCC Section 20.532.095(A)(5), the proposed development to demolish and remove an existing barrack structure, remove overhead electrical lines and associated panels, and install 315± linear feet of buried electrical conduit and associated electrical panels will not have any adverse impacts on any known archaeological or paleontological resource. An archaeological survey report and historic resource evaluation was prepared for the project. The survey and evaluation did not indicate the presence of any archaeological or paleontological resources in the project area. The Mendocino County Archaeological Commission accepted the results of the survey and recommended additional measures to ensure that potential unanticipated discoveries are addressed, and that tribal monitoring would occur during ground disturbing activities; and

6. Pursuant to MCC Section 20.532.095(A)(6), other public services, including but not limited to, solid waste and public roadway capacity have been considered and are adequate to serve the proposed development to demolish and remove an existing barrack structure, remove overhead electrical lines and associated panels, and install 315± linear feet of buried electrical conduit and associated electrical panels. Solid waste and public roadway capacity would not be impacted because the project would not create any new dwellings or otherwise increase population density; and

7. Pursuant to MCC Section 20.532.095(B)(1), the project is in conformity with the public access and public recreation policies of Chapter 3 of the California Coastal Act and the Coastal Element of the General Plan because the site is not in a Minimum Access Location depicted on the LCP maps, meaning the provision of new public access from the site to the sea is not warranted. No new uses would be established, nor would dwelling density increase because of the project.

8. Pursuant to MCC Section 20.532.100(A)(1)(a), the Redwood Forest and Woodland Alliance ESHA and redwood lily individuals will not be significantly degraded by the proposed development because demolition would eliminate artificial structures and allow for revegetation and expansion of the forest, trenching would result in temporary impacts where vegetation would be restored, and mitigation measures would be implemented to minimize impacts, such as the translocation of redwood lily bulbs.

9. Pursuant to MCC Section 20.532.100(A)(1)(b), there is no feasible less environmentally damaging alternative because demolition of the barrack structure would allow for revegetation and expansion of the ESHA and the proposed trenching follows either straight lines or natural contours from existing power poles to the residence. A different orientation of the electrical conduit would result in a greater distance of trenching and/or a greater amount of ground disturbance.

10. Pursuant to MCC Section 20.532.100(A)(1)(c), all feasible mitigation measures capable of reducing or eliminating project related impacts have been adopted, including flagging existing footprints and roadways, restricting construction vehicle operation within flagged areas to limit vegetation disturbance, implementation of noise reduction measures, misting and watering to control dust during removal, limiting activities to daylight hours, implementation of BMPs for erosion and sediment control, translocation of redwood lilies, limiting activities outside of Northern spotted owl breeding season, a bat mitigation plan, targeted removal of invasive species, environmental training for construction workers, and biological monitoring.

CONDITIONS OF APPROVAL AND MITIGATION MEASURES (as indicated by ""):**

1. This action shall become final on the 11th day following the decision unless an appeal is filed pursuant to Section 20.544.015 of the Mendocino County Code. The permit shall become effective after the ten (10) working day appeal period to the Coastal Commission has expired and no appeal has been filed with the Coastal Commission. The permit shall expire and become null and void at the expiration of two years after the effective date except where construction and/or use of the property in reliance on such permit has been initiated prior to its expiration. Such permit vesting shall include approved permits associated with this project (i.e. building permits, septic permits, well permits, etc.) and physical construction in reliance of such permits, or a business license demonstrating establishment of a use proposed under this project.

2. The use and occupancy of the premises shall be established and maintained in conformance with the provisions of Division II of Title 20 of the Mendocino County Code.

3. To remain valid, progress towards completion of the project must be continuous. The Applicants have sole responsibility for renewing this application before the expiration date. The County will not provide a notice prior to the expiration date.

4. The application, along with supplemental exhibits and related material, shall be considered elements

of this permit, and that compliance therewith is mandatory, unless an amendment has been approved by the Coastal Permit Administrator.

5. This permit shall be subject to the securing of all necessary permits for the proposed development from County, State and Federal agencies having jurisdiction.

6. This permit shall be subject to revocation or modification upon a finding of any one or more of the following:

    a. The permit was obtained or extended by fraud.

    b. One or more of the conditions upon which the permit was granted have been violated.

    c. The use for which the permit was granted is conducted so as to be detrimental to the public health, welfare or safety, or to be a nuisance.

    d. A final judgment of a court of competent jurisdiction has declared one or more conditions to be void or ineffective or has enjoined or otherwise prohibited the enforcement or operation of one or more such conditions.

7. This permit is issued without a legal determination having been made upon the number, size or shape of parcels encompassed within the permit described boundaries. Should, at any time, a legal determination be made that the number, size or shape of parcels within the permit described boundaries are different than that which is legally required by this permit, this permit shall become null and void.

8. If any archaeological sites or artifacts are discovered during site excavation or construction activities, the property owner shall cease and desist from all further excavation and disturbances within 100 feet of the discovery and make notification of the discovery to the Director of the Department of Planning and Building Services. The Director will coordinate further actions for the protection of the archaeological resources in accordance with Section 22.12.090 of the Mendocino County Code.

9. Conditions approving this variance shall be attached to or printed on any building permit application and shall be a part of on-site construction drawings.

10. Per Mendocino County Code Section 16.30.070(B), the permittee shall implement Best Management Practices (BMPs) to prevent the discharge of debris, contaminants, or construction waste from the site, or from grading or construction materials, tools, and equipment. Best Management Practices as appropriate for each project shall include but not be limited to the following:

    a. Scheduling construction activity.
    b. Preservation of natural features, vegetation, and soil.
    c. Drainage swales or lined ditches to control stormwater flow.
    d. Mulching or hydroseeding to stabilize disturbed soils.
    e. Erosion control to protect slopes.
    f. Protection of storm drain inlets (gravel bags or catch basin inserts).
    g. Perimeter sediment control (perimeter silt fence, fiber rolls).
    h. Sediment trap or sediment basin to retain sediment on site.
    i. Stabilized construction exits.
    j. Wind erosion control.
    k. Other soil loss BMP acceptable to the enforcing agency.
    l. Material handling and waste management.
    m. Building materials stockpile management.
    n. Management of washout areas (concrete, paints, stucco, etc.).
    o. Control of vehicle/equipment fueling to contractor’s staging area.

p. Vehicle and equipment cleaning performed off site.
q. Spill prevention and control.
r. Other housekeeping BMP acceptable to the enforcing agency.

11. **The permittee shall implement applicable Best Management Practices contained in the attached *BMP Letter*, including the following:

    a. Vehicle and Equipment Cleaning
    b. Vehicle and Equipment Fueling
    c. Vehicle and Equipment Maintenance
    d. Spill Prevention and Control
    e. Soil Waste Management
    f. Hazardous Waste Management
    g. Contaminated Soil Management
    h. Sanitary/Septic Waste Management

12. **In accordance with the recommendations of the Mendocino County Archaeological Commission at their meeting on July 10, 2024, the Sherwood Valley Band of Pomo Indians shall conduct tribal monitoring during the trenching phase of the project and may also be consulted when selecting local indigenous plants for revegetation. Sherwood Valley Band of Pomo Indians shall provide written confirmation to Planning & Building Services that monitoring has occurred.

13. **In accordance with the recommendations of the Mendocino County Archaeological Commission at their meeting on July 10, 2024, equipment shall not be parked in the meadow near the project area. The permittee shall coordinate with the tribal monitor to locate and avoid the meadow area.

14. **Prior to demolition activities, the identified redwood lilies (*Lilium rubescens*) shall be transplanted from the project site under the following conditions:

    a. The lilies shall be transplanted during their dormant season (typically in late summer to early fall after the flowering period but before the first frost).
    b. When digging up bulbs, as much of the root system should remain intact as possible.
    c. Bulbs should be handled with care to avoid bruising.
    d. The new location shall closely match the lilies natural habitat with well-drained soil, partial shade, and a site that receives filtered sunlight.
    e. Areas with heavy clay or overly moist conditions shall be avoided.
    f. The bulbs shall be placed in prepared holes at the same depth they were growing before.
    g. The bulbs shall be spaced adequately for growth, usually about twelve (12) to eighteen (18) inches apart.
    h. The bulbs shall be planted in clusters or groupings and not in a line or grid pattern.
    i. The transplanted location shall have temporary construction fencing installed around the lilies to prevent impact during project activities.

15. **To limit impacts to surrounding vegetation, the following avoidance and minimization measures shall be implemented:

    a. All construction vehicles shall utilize only existing footprints or roadways. Existing footprints and roadways shall be flagged or have temporary construction fencing installed to mark their limits, and all construction vehicles shall operate only within these designated areas.
    b. Maximize the preservation of existing vegetation by marking the project area boundaries and any protected areas.
    c. Instruct employees and subcontractors to honor project boundaries and prohibit access of heavy equipment, vehicular traffic, or storage of construction materials outside of the designated, delineated work area, access roads, and staging area(s) as indicated by temporary construction fencing or flagging. All employees and subcontractors shall receive

environmental training and understand the importance of staying within the project boundaries.

d. A qualified biologist shall be present during all activities including vegetation removal, electric conduit installation, and demolition activities to monitor to confirm species are not present and/or to relocate them out of the work area including amphibian species of special concern.

16. **If operations occur during the nesting bird season (February 15th to August 15th), a nesting bird survey shall take place at the site prior to construction activities.

17. **Demolition activities shall occur outside of the Northern spotted owl breeding season (after July 31st and before February 15th).

18. **The following measures shall be implemented to prevent impacts to bats.

    a. Demolition shall be conducted outside of pupping season (from June to August).
    b. Demolition shall occur during daylight hours to limit construction noise and artificial light.
    c. Demolition shall occur incrementally. Small portions of the roof structures shall be disassembled first. This will create a disturbance and an undesirable roost site, allowing any roosting bats to vacate the premises prior to the complete demolition of the structure.
    d. Prior to demolition of the structure, a bat survey shall be conducted by a qualified biologist. The bat survey will involve surveying the structure for evidence of bat use (guano accumulation, ammonia odor, grease-stained cavities). If an active roost site is found, the biologist shall conduct acoustic surveys using and acoustic detector to determine whether a site is occupied. Any positive results shall be submitted to Planning & Building Services and the California Department of Fish & Wildlife (CDFW) to determine if the proposed bat mitigation plan will adequately avoid impacts to bats. If evidence of bat use is not found, then the work may proceed.
    e. If an active pupping colony is observed, a one hundred (100) foot exclusion zone shall be established around the roost site. Demolition and/or ground disturbance shall not occur within the exclusion zone until all young are no longer dependent upon the roost. If no dependent pups are present, bats will be gently flushed out from the structures prior to demolition, incentivizing relocation.

19. **The following measures shall be implemented to prevent impacts to amphibians:

    a. A qualified biologist shall conduct pre-construction surveys for amphibians immediately before disturbance.
    b. A qualified biologist, who is onsite to monitor species during construction activities, shall relocate individuals found within the project footprint to suitable, nearby habitats.
    c. Sediment and erosion control measures shall be implemented to prevent runoff and sedimentation into areas where these species may reside or breed.

20. **The permittee shall monitor and target the removal of invasive plant species for a minimum of five (5) years. For example, species such as *Oxalis pes-caprae* (Buttercup oxalis) can be hand pulled, but the entirety of the plant should be removed, including underground rhizome and bulbs. Repeated pulling of the tops will deplete the bulb's carbohydrate reserves, but these efforts may take several years to be successful.

21. **To limit the emission of hazardous materials during demolition, the following shall occur:

    a. Prior to issuance of a building permit for demolition of the barrack structure, the applicant shall obtain a copy of each written asbestos notification regarding the structure that has been required to be submitted to the Mendocino County Air Quality Management District in accordance with California Health and Safety Code Section 19827.5. The building permit

may be issued without submitting a copy of the written notification if the applicant declares that the notification is not applicable to the proposed demolition project in accordance with Section 19827.5.

b. For any asbestos containing materials (ACM) identified in the Limited Asbestos Bulk Materials Survey Report that would be disturbed by the project, a CSLB Licensed Contractor with a C-22 asbestos endorsement and Department of Occupational Safety & Health) DOSH registration shall conduct the removal and/or abatement method for the ACM.

c. For any lead-containing materials identified in the Lead in Paint Inspection Report that would be disturbed by the project, all related demolition work shall be carried out in accordance with "Lead Exposure in the Construction Industry" regulations (29 CFR 1926.62 and 8 CCR 1532.1).

d. The demolition of building materials which have lead-based and/or lead-containing paints shall be conducted with the material kept in a wetted state and removed in sections, as feasible, to reduce the potential for airborne lead emissions.

e. Prior to demolition, the barrack structure shall be inspected for the presence of mercury-containing products. These may include, but are not limited to, certain batteries, thermostats, barometers, temperature and pressure gauges, certain switches, and light bulbs. Any mercury-containing products should be recycled, such as through Mendocino County's HAZ-MOBILE program.

~~b.~~f. Prior to demolition, the barrack structure and surrounding area shall be inspected for the presence of polychlorinated biphenyl caulk (PCB) in accordance with the Department of Toxic Substances Control's (DTSC's) Preliminary Endangerment Assessment (PEA) Guidance Manual. If PCBs are detected at levels that require cleanup (0.23 mg/kg), they shall be disposed on in accordance with DTSC and/or US EPA regulations (40 CFR Part 761).

~~21.~~22. This entitlement does not become effective or operative and no work shall be commenced under this entitlement until the California Department of Fish and Wildlife filing fees required or authorized by Section 711.4 of the Fish and Game Code are submitted to the Mendocino County Department of Planning and Building Services. Said fee of $2,966.75 or current fee shall be made payable to the Mendocino County Clerk and submitted to the Department of Planning and Building Services within five (5) days of the end of any appeal period. Any waiver of the fee shall be on a form issued by the Department of Fish and Wildlife upon their finding that the Project has "no effect" on the environment. If the Project is appealed, the payment will be held by the Department of Planning and Building Services until the appeal is decided. Depending on the outcome of the appeal, the payment will either be filed with the County Clerk (if the Project is approved) or returned to the payer (if the Project is denied). Failure to pay this fee by the specified deadline shall result in the entitlement becoming null and void. **The applicant has the sole responsibility to ensure timely compliance with this condition.**

Mitigation Monitoring and Reporting Program (MMRP)					
			Compliance Verification		
Mitigation Measure(s)	Implementation Timing	Monitoring/Reporting Responsibility	Initial	Date	Comments
Air Quality					
AQ-1: To limit the emission of hazardous materials during demolition, the following shall occur: a.Prior to issuance of a building permit for demolition of the barrack structure, the applicant shall obtain a copy of each written asbestos notification regarding the structure that has been required to be submitted to the Mendocino County Air Quality Management District in accordance with California Health and Safety Code Section 19827.5. The building permit may be issued without submitting a copy of the written notification if the applicant declares that the notification is not applicable to the proposed demolition project in accordance with Section 19827.5. **b.For any asbestos containing materials (ACM) identified in the Limited Asbestos Bulk Materials Survey Report that would be disturbed by the project, a CSLB Licensed Contractor with a C-22 asbestos endorsement and Department of Occupational Safety & Health) DOSH registration shall conduct the removal and/or abatement method for the ACM.** **c.For any lead-containing materials identified in the Lead in Paint Inspection Report that would be disturbed by the project, all related demolition work shall be carried out in accordance with "Lead Exposure in the Construction Industry" regulations (29 CFR 1926.62 and 8 CCR 1532.1).** **d.The demolition of building materials which have lead-based and/or lead-containing paints shall be conducted with the material kept in a wetted state and removed in sections, as feasible, to reduce the potential for airborne lead emissions.** **e.Prior to demolition, the barrack structure shall be inspected for the presence of mercury-containing products. These may include, but are not limited to, certain batteries, thermostats, barometers, temperature and pressure gauges, certain switches, and light bulbs. Any mercury-containing products should be recycled, such as through Mendocino County's HAZ-MOBILE program.** **f.Prior to demolition, the barrack structure and surrounding area shall be inspected for the presence of polychlorinated biphenyl caulk (PCB) in accordance with the Department of Toxic Substances Control's (DTSC's) Preliminary Endangerment Assessment (PEA) Guidance Manual. If PCBs are detected at levels that require cleanup (0.23 mg/kg), they shall be disposed on in accordance with DTSC and/or US EPA regulations (40 CFR Part 761).**	Prior to demolition of the barrack structure.	Mendocino County Department of Planning & Building Services and Mendocino County Air Quality Management District.			
Biological Resources					
BIO-1: The permittee shall implement applicable Best Management Practices contained in the attached BMP Letter, including the following: a.Vehicle and Equipment Cleaning b.Vehicle and Equipment Fueling c.Vehicle and Equipment Maintenance d.Spill Prevention and Control e.Soil Waste Management f.Hazardous Waste Management g.Contaminated Soil Management h.Sanitary/Septic Waste Management	During construction.	Permittee/contractor.			

Mitigation Monitoring and Reporting Program (MMRP)					
			Compliance Verification		
Mitigation Measure(s)	Implementation Timing	Monitoring/Reporting Responsibility	Initial	Date	Comments
BIO-2: Prior to demolition activities, the identified redwood lilies (Lilium rubescens) shall be transplanted from the project site under the following conditions: a.The lilies shall be transplanted during their dormant season (typically in late summer to early fall after the flowering period but before the first frost). b.When digging up bulbs, as much of the root system should remain intact as possible. c.Bulbs should be handled with care to avoid bruising. d.The new location shall closely match the lilies natural habitat with well-drained soil, partial shade, and a site that receives filtered sunlight. e.Areas with heavy clay or overly moist conditions shall be avoided. f.The bulbs shall be placed in prepared holes at the same depth they were growing before. g.The bulbs shall be spaced adequately for growth, usually about twelve (12) to eighteen (18) inches apart. h.The bulbs shall be planted in clusters or groupings and not in a line or grid pattern. i.The transplanted location shall have temporary construction fencing installed around the lilies to prevent impact during project activities.	Prior to demolition of barracks.	Permittee/contractor.			
BIO-3: To limit impacts to surrounding vegetation, the following avoidance and minimization measures shall be implemented: a.All construction vehicles shall utilize only existing footprints or roadways. Existing footprints and roadways shall be flagged or have temporary construction fencing installed to mark their limits, and all construction vehicles shall operate only within these designated areas. b.Maximize the preservation of existing vegetation by marking the project area boundaries and any protected areas. c.Instruct employees and subcontractors to honor project boundaries and prohibit access of heavy equipment, vehicular traffic, or storage of construction materials outside of the designated, delineated work area, access roads, and staging area(s) as indicated by temporary construction fencing or flagging. All employees and subcontractors shall receive environmental training and understand the importance of staying within the project boundaries. d.A qualified biologist shall be present during all activities including vegetation removal, electric conduit installation, and demolition activities to monitor to confirm species are not present and/or to relocate them out of the work area including amphibian species of special concern.	During construction.	Permittee/contractor.			
BIO-4: If operations occur during the nesting bird season (February 15th to August 15th), a nesting bird survey shall take place at the site prior to construction activities.	Prior to construction activities.	Permittee/contractor.			
BIO-5: Demolition activities shall occur outside of the Northern spotted owl breeding season (after July 31st and before February 15th).	Prior to construction activities.	Permittee/contractor.			

Mitigation Monitoring and Reporting Program (MMRP)					
			Compliance Verification		
Mitigation Measure(s)	Implementation Timing	Monitoring/Reporting Responsibility	Initial	Date	Comments
BIO-6: The following measures shall be implemented to prevent impacts to bats. a.Demolition shall be conducted outside of pupping season (from June to August). b.Demolition shall occur during daylight hours to limit construction noise and artificial light. c.Demolition shall occur incrementally. Small portions of the roof structures shall be disassembled first. This will create a disturbance and an undesirable roost site, allowing any roosting bats to vacate the premises prior to the complete demolition of the structure. d.Prior to demolition of the structure, a bat survey shall be conducted by a qualified biologist. The bat survey will involve surveying the structure for evidence of bat use (guano accumulation, ammonia odor, grease-stained cavities). If an active roost site is found, the biologist shall conduct acoustic surveys using and acoustic detector to determine whether a site is occupied. Any positive results shall be submitted to Planning & Building Services and the California Department of Fish & Wildlife (CDFW) to determine if the proposed bat mitigation plan will adequately avoid impacts to bats. If evidence of bat use is not found, then the work may proceed. e.If an active pupping colony is observed, a one hundred (100) foot exclusion zone shall be established around the roost site. Demolition and/or ground disturbance shall not occur within the exclusion zone until all young are no longer dependent upon the roost. If no dependent pups are present, bats will be gently flushed out from the structures prior to demolition, incentivizing relocation.	Prior to demolition of barracks.	Permittee/contractor, Mendocino County Department of Planning & Building Services, and California Department of Fish & Wildlife (CDFW).			
BIO-7: The following measures shall be implemented to prevent impacts to amphibians: a.A qualified biologist shall conduct pre-construction surveys for amphibians immediately before disturbance. b.A qualified biologist, who is onsite to monitor species during construction activities, shall relocate individuals found within the project footprint to suitable, nearby habitats. c.Sediment and erosion control measures shall be implemented to prevent runoff and sedimentation into areas where these species may reside or breed.	Prior to construction activities.	Permittee/contractor.			
BIO-8: The permittee shall monitor and target the removal of invasive plant species for a minimum of five (5) years. For example, species such as Oxalis pes-caprae (Buttercup oxalis) can be hand pulled, but the entirety of the plant should be removed, including underground rhizome and bulbs. Repeated pulling of the tops will deplete the bulb's carbohydrate reserves, but these efforts may take several years to be successful. At the end of the five (5) year period, a qualified biologist shall submit a report to Planning & Building Services which outlines the results of targeted removal efforts. The report should quantify the success of removal efforts. For example, the report should include a percentage change in the relative cover of invasive species within one hundred (100) feet of the project area from the targeted removal period.	Continuous.	Permittee.			
Tribal Cultural Resources					
TCR-1: In accordance with the recommendations of the Mendocino County Archaeological Commission at their meeting on July 10, 2024, the Sherwood Valley Band of Pomo Indians shall conduct tribal monitoring during the trenching phase of the project and may also be consulted when selecting local indigenous plants for revegetation. Sherwood Valley Band of Pomo Indians shall provide written confirmation to Planning & Building Services that monitoring has occurred.	During electrical conduit trenching.	Mendocino County Department of Planning & Building Services and Sherwood Valley Band of Pomo Indians.			
TCR-2: In accordance with the recommendations of the Mendocino County Archaeological Commission at their meeting on July 10, 2024, equipment shall not be parked in the meadow near the project area. The permittee shall coordinate with the tribal monitor to locate and avoid the meadow area.	During demolition and electrical conduit installation	Permittee/contractor.			

Department of Toxic Substances Control

Yana Garcia
Secretary for
Environmental Protection

Meredith Williams, Ph.D.
Director
8800 Cal Center Drive
Sacramento, California 95826-3200

Gavin Newsom
Governor

SENT VIA ELECTRONIC MAIL

September 4, 2024

Liam Crowley
Planner
Mendocino County
860 N Bush Street
Ukiah, CA 95482
crowleyl@mendocinocounty.gov

RE: MITIGATED NEGATIVE DECLARATION FOR THE CDP_2024-0015 (SAVE THE REDWOODS LEAGUE) DATED AUGUST 22 2024, STATE CLEARINGHOUSE NUMBER 2024080903

Dear Liam Crowley,

The Department of Toxic Substances Control (DTSC) received a Mitigated Negative Declaration (MND) for the CDP_2024-0015 (Save the Redwoods League) project (project). The project proposes to demolish and remove an approximate 1,210 square foot barrack structure and the overhead electrical lines and panels currently serving the barrack structure and adjacent mess hall. The project would also install 315 linear feet of two-inch diameter buried electrical conduit and electrical panels to restore connectivity to the mess hall. Several other activities would occur in accordance with mitigation measures recommended for adoption, including revegetation, translocation of existing plants, pre-construction surveys, installation of temporary fencing, and others. After reviewing the project, DTSC recommends and requests consideration of the following comments:

1. DTSC recommends that all imported soil and fill material should be tested to assess any contaminants of concern meet screening levels as outlined in DTSC's Preliminary Endangerment Assessment (PEA) Guidance Manual. Additionally, DTSC advises referencing the DTSC Information Advisory Clean Imported Fill Material Fact Sheet if importing fill is necessary. To minimize the possibility of introducing contaminated soil and fill material there should be documentation of the origins of the soil or fill material and, if applicable, sampling be conducted to ensure that the imported soil and fill material are suitable for the intended land use. The soil sampling should include analysis based on the source of the fill and knowledge of the prior land use. Additional information can be found by visiting DTSC's Human and Ecological Risk Office (HERO) webpage.
2. If buildings or other structures are to be demolished on any project sites included in the proposed project, surveys should be conducted for the presence of lead-based paints or products, mercury, asbestos containing materials, and polychlorinated biphenyl caulk. Removal, demolition, and disposal of any of the above-mentioned chemicals should be conducted in compliance with California environmental regulations and policies. In addition, sampling near current and/or former buildings should be conducted in accordance with DTSC's PEA Guidance Manual.

DTSC appreciates the opportunity to comment on the MND for the CDP_2024-0015 (Save the Redwoods League) project. Thank you for your assistance in protecting California's people and environment from the harmful effects of toxic substances. If you have any questions or would like clarification on DTSC's comments, please respond to this letter or via email for additional guidance.

Sincerely,

Tamara Purvis
Associate Environmental Planner
HWMP - Permitting Division – CEQA Unit
Department of Toxic Substances Control
Tamara.Purvis@dtsc.ca.gov

cc: (via email)

Governor's Office of Planning and
Research State Clearinghouse
State.Clearinghouse@opr.ca.gov

Dave Kereazis
Associate Environmental Planner
HWMP-Permitting Division – CEQA Unit
Department of Toxic Substances Control
Dave.Kereazis@dtsc.ca.gov

Scott Wiley
Associate Governmental Program Analyst
HWMP - Permitting Division – CEQA Unit
Department of Toxic Substances Control
Scott.Wiley@dtsc.ca.gov

AWS 1990
October 3, 2017

Alex Herr
North Coast Resource Management (NCRM)
6190 N. State St
Capella, CA 95418

RE: Lead In Paint Inspection Report
44000 North Highway 1, Westport, CA 95488

Dear Mr. Herr:

Air & Water SCIENCES (AWS) is pleased to provide the results from the Lead-In-Paint survey conducted on the residence and outbuildings at the property referenced above. This report includes the procedures and methodologies followed and XRF data from our inspection performed on August 31, 2017.

During the inspection, a total of forty-three (43) readings were collected from both the interior and exterior surfaces of four buildings on the property. Below is a general overview of what surfaces tested positive for lead based or lead containing paint. A more detailed presentation of procedures and findings is presented in the body of this report.

- **Lead based paint was identified in the main house on the brown exterior metal window frame and the ceramic brown tiles in the bathroom.**
- **Lead based paint was identified on the exterior of the barn building in the white wooden window sash and door.**
- **Lead containing paint was identified on the exterior of the barn building on the red wood wall.**
- **Lead based paint was identified on the exterior of the old barracks building in the brown metal walls and the green painted metal windows.**
- **Lead containing paint was identified on the exterior of the old barracks building on the green metal door.**
- **No lead paint was identified on the exterior of the shed.**

AWS appreciates the opportunity to perform these services for you and NRCM and we look forward to working with you in the future. Please know that if at any time you have questions or comments regarding the information in this report or if we can be of further assistance, we can be reached at (707) 769-2289.

Respectfully submitted,

Air & Water SCIENCES

Chip Prokop, PE, CIEC, CAC 08-4420
Principal

Background

The structures are located outside of Westport, California at 44000 North Highway 1. The home and other buildings, including, a garage and apartment will be demolished in the near future. AWS was requested to test all materials in the structure that may be disturbed by the planned demolition.

Mr. Christopher Bennett, CDPH certified Lead Inspector/Assessor #25182 performed the inspection on August 31, 2017. A detailed presentation of procedures and findings is presented in the body of this report. Also included is a discussion of recommendations and regulatory considerations.

Lead-In-Paint XRF Survey Procedures

The sampling strategy employed was performed as outlined in Title 17, California Code of Regulations, Division 1, Chapter 8 and in accordance with those survey procedures listed in the "Guidelines for the Evaluation and Control of Lead Based Paint Hazards in Housing", June 1995, by the U.S. Department of Housing and Urban Development (HUD). Our investigation included the collection of readings on similar painted surfaces (not every component in every room as dictated by HUD guidelines).

Prior to data collection, painted/coated surfaces were categorized into distinct areas of homogeneity, substrate material, building material, and/or distinct paint type. After the items have been identified, a representative reading of the painted/coated surface is collected. Because painted/coated surfaces have compositional variability due to one or more paint layers, it is possible to obtain different readings for samples from the same homogeneous area. Therefore, a homogeneous area with at least one XRF reading of 1.0 mg/cm^2 or greater will result in the entire homogenous material, substrate, and/or distinct paint type being designated as lead based paint.

Each XRF reading along with the location, component, substrate, color, and condition of the painted/coated surface is included in the XRF readings table located at the end of this report.

Sample Analysis

The XRF testing was performed in accordance with the aforementioned criteria, using a ThermoFisher Scientific, Niton Portable XRF Analyzer. Exposure times are internally determined by the instrument and are based on a number of factors including lead content, substrate and source strength. The instrument is calibrated to the manufacturer's specifications and was periodically verified against known lead standards produced by the National Institute of Standards and Testing.

HUD defines action level as the hazard level for which a corrective response action will be required. Currently, the most widely used action level for lead-based paint (LBP) is 1.0 mg/cm^2 (as measured by an XRF) established by HUD and adopted by the U.S. Environmental Protection Agency. The action level is 5000 parts per million (ppm) or 0.5% by weight when collected paint chip samples are analyzed using atomic absorption spectroscopy (AAS).

HUD guidelines consider XRF findings of 1.0 mg/cm^2 or greater, as lead based paint, which may be a potential hazard. It is extremely important to understand that XRF readings, which have a value of 0.0 mg/cm^2 do not necessarily mean there is "no lead present".

Results

During the inspection, a total of forty-three (43) readings were collected from both the interior and exterior surfaces of four buildings on the property.

Main House

- **Lead based paint was identified in the main house on the brown exterior metal window frame outside of the living room.**
- **Lead based paint was identified in the main house in the ceramic brown tiles in the bathroom on the counter top and floor.**

Barn Building

- **Lead based paint was identified on the exterior of the barn building in the white painted wooden window sash and door.**
- **Lead containing paint was identified on the exterior of the barn building on the red wood wall.**

Old Barracks Building

- **Lead based paint was identified on the exterior of the old barracks building in the brown metal walls**
- **Lead based paint was identified on the exterior of the old barracks building in the green painted metal windows.**
- **Lead containing paint was identified on the exterior of the old barracks building on the green metal doors.**

Shed

- **No lead paint was identified on the exterior of the shed.**
- **No samples were collected from the interior of the shed.**

Regulatory Considerations/Recommendations

Based on the XRF readings the disturbance of the identified materials would be subject to the U.S. Environmental Protection Agency (EPA) Lead Renovation, Repair and Painting Program, as well as, California Occupational Safety and Health Administration (Cal-OSHA) regulations for lead containing paint. The following section of the report is a summary of the Cal-OSHA lead regulation.

Construction Work Standards

At present, there are no state or federal laws dealing with mandatory abatement following the identification of lead containing or lead based paints prior to disturbance. However, in 1993 OSHA promulgated legislation (29 CFR 1926.62 and 8 CCR 1532.1) entitled "Lead Exposure in the Construction Industry" which deals with worker exposure to lead.

It should be noted that aside from the HUD definition of lead based paint (1.0 mg/cm^2), OSHA regulates worker protection and work practices on building components containing any detectable amounts of lead. Therefore, components determined to contain less than 1.0 mg/cm^2 may still be subject to OSHA regulations, if these materials are to be disturbed. This standard essentially states that work, involving components containing any amount of lead must follow certain guidelines.

These guidelines include but are not limited to training, personal protective equipment, and specific work practices whenever workers disturb lead in any concentration because the

disturbance may result in airborne exposures over action or permissible exposure limits. This legislation requires that any task that may potentially expose workers to any concentration of lead be monitored to determine workers eight-hour time weighted average (TWA) exposure to lead. Prior to conduction of activities that may generate a lead exposure, such workers must be properly fitted with respiratory protection and protective clothing until personal eight-hour TWA results reveal exposures within acceptable levels.

Any proposed renovation, which may involve the removal of building materials with lead based or lead containing painted surfaces, should include provisions to minimize the potential for airborne release of lead contaminated dust. It is recommended, as a minimum, that demolition of building materials which have lead based and/or lead containing paints be conducted with the materials kept in a wetted state and removed in sections, as feasible, to reduce the potential for airborne lead emissions.

Limitations

This inspection was conducted in accordance with generally accepted standard of care practiced by other members of our profession. The professional opinions set forth in this report are based solely upon and limited to our visual observation and data collection at the subject site.

The opinions and recommendations in this report apply to site conditions and features, as they existed at the time of our work. They cannot necessarily apply to conditions and features of which we are unaware and have not had the opportunity to evaluate. Future regulatory modifications, agency interpretations and/or policy changes may affect the compliance status of the subject property.

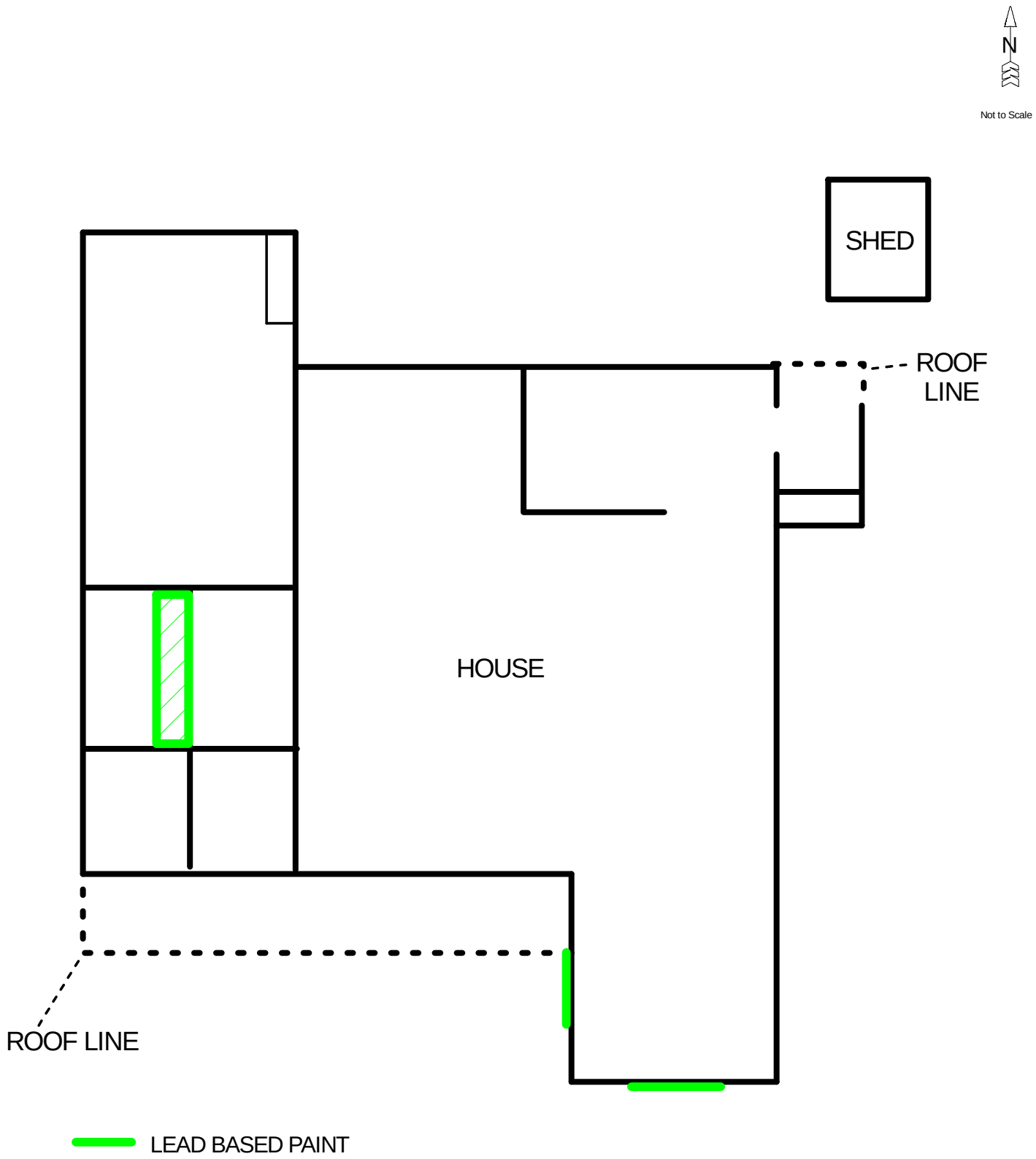
Lead Based Paint Sample Results

Site Location: 44000 N. Hwy 1, Westport, CA 95488 **Job #:** AWS 1990
Building: Single Family Residence + Out Buildings
Inspector: Christopher Bennett **Date of Inspection:** 8/31/2017

Location	Room	Component	Substrate	Wall	Paint Condition	Color	RESULTS	Analytical Result (mg/cm^2)
		Calibration						2.18
		Calibration						< LOD
		Calibration						0.9
		Calibration						0.7
FIRST	**EXT off LIVING RM**	**WINDOW FRAME**	**METAL**	**D**	**POOR**	**BROWN**	LBP	**4.1**
FIRST	**EXT off LIVING RM**	**WINDOW FRAME**	**METAL**	**D**	**POOR**	**BROWN**	LBP	**3.7**
FIRST	LIVING ROOM	WALL	DRYWALL	D	INTACT	WHITE	NLD	< LOD
FIRST	DINING ROOM	WALL	DRYWALL	B	INTACT	WHITE	NLD	< LOD
FIRST	BATHROOM	DOOR	DRYWALL	C	INTACT	BROWN	NLD	< LOD
FIRST	BATHROOM	DOOR JAMB	DRYWALL	C	INTACT	BROWN	NLD	< LOD
FIRST	LAUNDRY	DOOR JAMB	WOOD	C	INTACT	WHITE	NLD	< LOD
FIRST	LAUNDRY	DOOR FRAME	WOOD	C	INTACT	WHITE	NLD	< LOD
FIRST	LAUNDRY	WALL	WOOD	B	INTACT	GREEN	NLD	< LOD
FIRST	LAUNDRY	WINDOW FRAME	WOOD	A	INTACT	GREEN	NLD	< LOD
FIRST	LAUNDRY	WALL	WOOD	D	INTACT	GREEN	NLD	< LOD
FIRST	OUTSIDE	DOOR JAMB	WOOD	A	INTACT	WHITE	NLD	< LOD
FIRST	OUTSIDE	DOOR FRAME	WOOD	A	INTACT	WHITE	NLD	< LOD
FIRST	OUTSIDE	WINDOW SILL	WOOD	A	INTACT	WHITE	NLD	< LOD
FIRST	OUTSIDE	WINDOW SILL	WOOD	A	INTACT	WHITE	NLD	< LOD
FIRST	BATHROOM	WALL	WOOD	C	INTACT	WHITE	NLD	< LOD
FIRST	BATHROOM	CEILING	DRYWALL	C	INTACT	WHITE	NLD	< LOD
FIRST	BEDROOM	CEILING	DRYWALL	C	INTACT	WHITE	NLD	< LOD
FIRST	BEDROOM	CEILING	DRYWALL	C	INTACT	WHITE	NLD	< LOD
FIRST	**BATHROOM**	**COUNTER TOP**	**Ceramic Tile**	**A**	**INTACT**	**BROWN**	LBP	**1.5**
FIRST	**BATHROOM**	**COUNTER TOP**	**Ceramic Tile**	**A**	**INTACT**	**BROWN**	LBP	**1.7**
FIRST	**BATHROOM**	**FLOOR**	**Ceramic Tile**	**A**	**INTACT**	**BROWN**	LBP	**1.9**
FIRST	BEDROOM	WINDOW SILL	WOOD	C	INTACT	BROWN	NLD	< LOD
BARN	OUTSIDE	WALL	WOOD	B	POOR	RED	LCP	0.5
BARN	**OUTSIDE**	**WINDOW SASH**	**WOOD**	**B**	**POOR**	**WHITE**	LBP	**5.6**
BARN	OUTSIDE	WINDOW SILL	WOOD	B	POOR	WHITE	NLD	< LOD
BARN	OUTSIDE	DOOR JAMB	WOOD	B	POOR	WHITE	NLD	< LOD
BARN	**OUTSIDE**	**DOOR**	**WOOD**	**B**	**POOR**	**WHITE**	LBP	**17**
BARN	OUTSIDE	DOOR	WOOD	B	POOR	WHITE	NLD	< LOD
BARN	OUTSIDE	WALL	WOOD	A	POOR	BROWN	NLD	< LOD
BARN	BEDROOM	WALL	DRYWALL	B	INTACT	WHITE	NLD	< LOD

Location	Room	Component	Substrate	Wall	Paint Condition	Color	RESULTS	Analytical Result (mg/cm^2)
BARN	BATHROOM	WALL	DRYWALL	B	INTACT	WHITE	NLD	< LOD
BARN	BATHROOM	WALL	DRYWALL	B	INTACT	WHITE	NLD	< LOD
OLD BARRACKS BLDG	**OUTSIDE**	**WALL**	**METAL**	**A**	**POOR**	**BROWN**	LBP	**12**
OLD BARRACKS BLDG	**OUTSIDE**	**WALL**	**METAL**	**A**	**POOR**	**BROWN**	LBP	**10.7**
OLD BARRACKS BLDG	**OUTSIDE**	**WALL**	**METAL**	**B**	**POOR**	**BROWN**	LBP	**5.2**
OLD BARRACKS BLDG	**OUTSIDE**	**WINDOW**	**METAL**	**B**	**POOR**	**GREEN**	LBP	**1.5**
OLD BARRACKS BLDG	**OUTSIDE**	**WINDOW**	**METAL**	**B**	**POOR**	**GREEN**	LBP	**7.3**
OLD BARRACKS BLDG	OUTSIDE	DOOR	WOOD	B	POOR	GREEN	LCP	0.8
BARN STYLE BLDG	OUTSIDE	DOOR	WOOD	B	POOR	GREEN	LCP	0.6
SHED	OUTSIDE	WALL	WOOD	B	INTACT	BROWN	NLD	< LOD
SHED	OUTSIDE	DOOR	WOOD	C	INTACT	WHITE	NLD	< LOD
SHED	OUTSIDE	DOOR	WOOD	C	INTACT	WHITE	NLD	< LOD
		Calibration						< LOD
		Calibration						1
		Calibration						0.6

	= Calibration
NLD	**= No Lead Detected**
LCP	**= Lead Containing Paint Detected**
LBP	**= Lead Based Paint Detected**



Air & Water SCIENCES
Environmental Consultants

MAIN HOUSE, SHED
44000 HWY 1
WESTPORT, CA

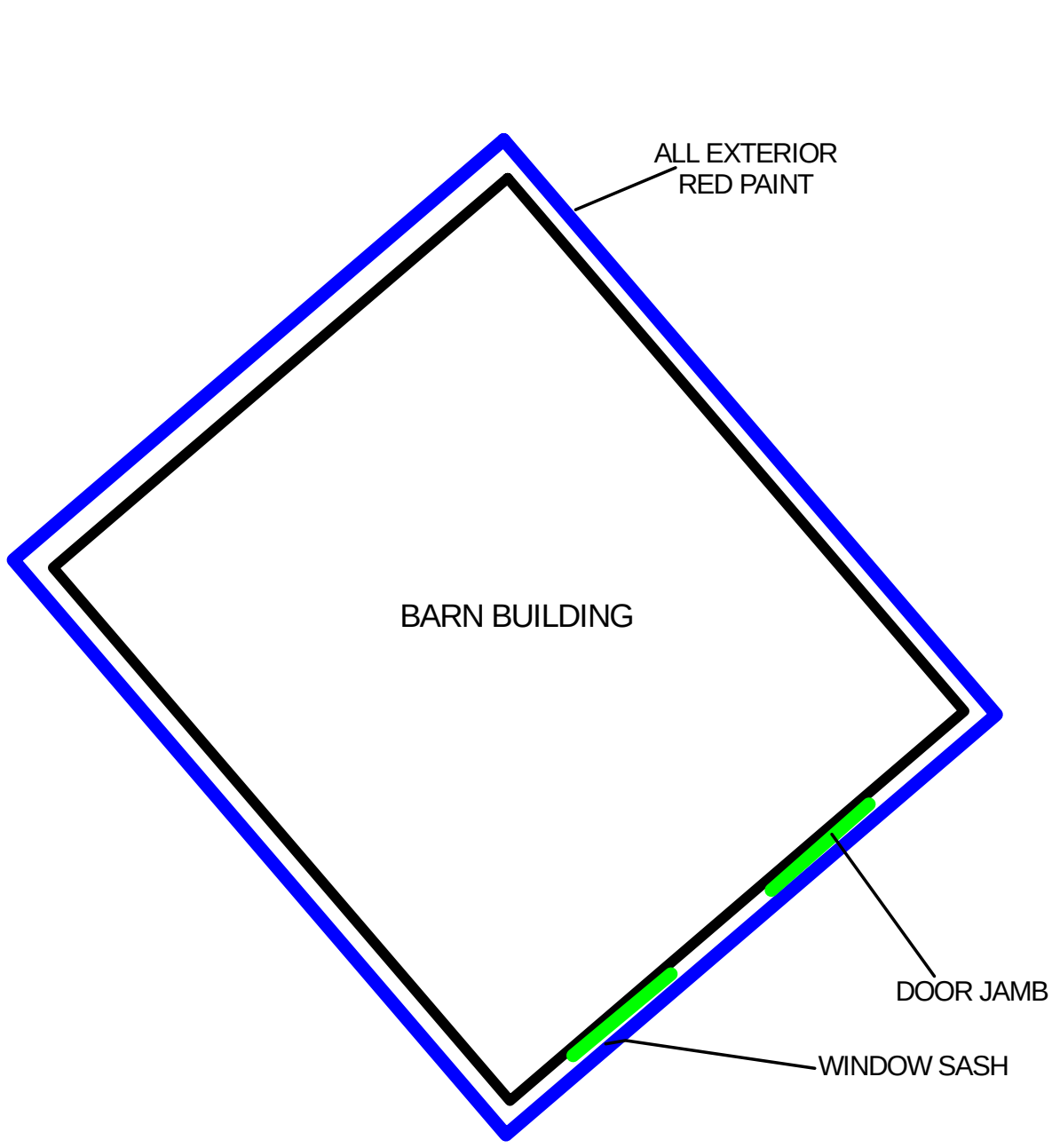
Air & Water Sciences
625 2nd Street., Ste. 210 Petaluma, CA 94952
(707) 769-2289 / Fax (707) 658-2031

FIGURE 1

LEAD IN PAINT LOCATIONS

PROJECT NO. 1990

DATE: August 31, 2017



Air & Water SCIENCES
Environmental Consultants

BARN BLDG - 2ND FLOOR
44000 HWY 1
WESTPORT, CA

Air & Water Sciences
625 2nd Street., Ste. 210 Petaluma, CA 94952
(707) 769-2289 / Fax (707) 658-2031

FIGURE 1
LEAD IN PAINT LOCATIONS

PROJECT NO. 1990

DATE: August 31, 2017

LEAD HAZARD EVALUATION REPORT

Section 1 — Date of Lead Hazard Evaluation August 31, 2017

Section 2 — Type of Lead Hazard Evaluation (Check one box only)

☑ Lead Inspection ☐ Risk assessment ☐ Clearance Inspection ☐ Other (specify) _____

Section 3 — Structure Where Lead Hazard Evaluation Was Conducted

Address [number, street, apartment (if applicable)]	City	County	Zip Code
44000 North HWY 1	Westport	Mendocino	95488

Construction date (year) of structure	Type of structure	Children living in structure?
Prior to 1978	☐ Multi-unit building ☐ School or daycare ☑ Single family dwelling ☐ Other_____	☐ Yes ☑ No ☐ Don't Know

Section 4 — Owner of Structure (if business/agency, list contact person)

Name	Telephone number
Contact: Alex Herr, North Coast Resource Management	

Address [number, street, apartment (if applicable)]	City	State	Zip Code
6190 N. State St	Capella	CA	95418

Section 5 — Results of Lead Hazard Evaluation (check all that apply)

☐ No lead-based paint detected ☐ Intact lead-based paint detected ☑ Deteriorated lead-based paint detected

☐ No lead hazards detected ☐ Lead-contaminated dust found ☐ Lead-contaminated soil found ☐ Other_____

Section 6 — Individual Conducting Lead Hazard Evaluation

Name	Telephone number
Chip Prokop	707-769-2289

Address [number, street, apartment (if applicable)]	City	State	Zip Code
625 2nd Street #210	Petaluma	CA	94952

CDPH certification number	Signature	Date
22184		

Name and CDPH certification number of any other individuals conducting sampling or testing (if applicable)

Section 7 — Attachments

A. A foundation diagram or sketch of the structure indicating the specifc locations of each lead hazard or presence of lead-based paint;
B. Each testing method, device, and sampling procedure used;
C. All data collected, including quality control data, laboratory results, including laboratory name, address, and phone number.

First copy and attachments retained by inspector

Second copy and attachments retained by owner

Third copy only (no attachments) mailed or faxed to:

California Department of Public Health
Childhood Lead Poisoning Prevention Branch Reports
850 Marina Bay Parkway, Building P, Third Floor
Richmond, CA 94804-6403
Fax: (510) 620-5656

LIMITED ASBESTOS BULK MATERIALS SURVEY REPORT

PROPERTY ADDRESS:

CAPE VIZCAINO

44000 HWY 1 WESTPORT, CA 95488

PREPARED FOR:

NCRM
2501 N STATE STREET
UKIAH, CA 95482
APENDERGAST@NCRM.COM

REVISED AUGUST 19, 2024

SEPTEMBER 29, 2023

PREPARED BY:

CALINC TRAINING LLC
2040 PEABODY ROAD, SUITE 400
VACAVILLE, CA 95687
707.446.7996
WWW.CAL-INC.COM

JOB# 13963

TABLE OF CONTENTS

APPENDICES

Corporate Office:
CALINC
2040 Peabody Road
Vacaville, CA 95687
(707) 446-7996
(800) 359-4467
(707) 446-9072 fax

Established 1979

September 29, 2023 **Updated August 19, 2024**

Alejandra Pendergast
NCRM
2501 N. State Street
Ukiah, CA 95482

Email: apendergast@ncrm.com
Phone: 626.230.6385

RE: **Limited Asbestos Bulk Materials Survey – ASBESTOS DETECTED & PRESENT**
Project Name: Cape Vis Camp
Address: 4400 Hwy 1, Westport, CA 95488
CALINC Job Number: #13963

To Whom This May Concern,

CALINC Training, LLC. is pleased to provide this report documenting the Asbestos Materials Survey Report at the above referenced location. This work was performed in general accordance with applicable government and industry standards.

We appreciate the opportunity to provide environmental services. If you have any questions concerning this report, or if we can assist you in any other matter, please contact our office at (707) 446-7996.

Sincerely,

Olivia Kilpatrick
OLIVIA KILPATRICK
DIRECTOR | BUSINESS DEVELOPMENT

Report signed off by:

Kenneth Rodriguez-Praeger, Certified Asbestos Consultant
DOSH CAC 19-66603

1.0 Summary

CALINC Training, LLC. performed a limited asbestos bulk material survey within the referenced property. The scope of work included a visual inspection, sample collection and laboratory analysis of the bulk samples collected within the work area(s) to gather data to support our conclusions attached. The purpose of this survey was for a planned demolition of the structure(s) on site. The technical findings and methods of this survey are enclosed in the provided chain of custody, laboratory analytics and appendices. Sampling was conducted by Kenneth Rodriguez-Praeger, a representative of CALINC Training, LLC. and California Division of Occupational Safety and Health (DOSH) Certified Asbestos Consultant (C.A.C No. 19-6603).

Upon review of the analytical data and the inspector's assessment, CALINC Training, LLC. has concluded that the following material(s) within the referenced property are positive for asbestos content:

- Drywall & Joint Compound – Cabin Building (2% Chrysotile)
- 9x9 VFT & Mastic – Cabin Building (2% Chrysotile – Tile, None Detected – Mastic)
- Black/White Wall Sealant – Barracks Building (6% Chrysotile)
- Possible Transite Pipes located in Cabin building above wall unit & water heater

If the referenced materials above are to be disturbed, at a minimum a CSLB Licensed Contractor with a C-22 asbestos abatement endorsement and DOSH (Division of Occupational Safety & Health) registration, can conduct the removal and/or abatement method. CALINC Training, LLC. recommends additional analysis of any sample analyzed to contain <1% (For an additional Fee). Further analysis could determine the material as Non-Hazardous waste if successful (potentially lower disposal
cost).

CALINC Training, LLC. is committed to providing industry leading customer service. If you have any questions or need assistance regarding this report, please contact us at 707-446-7996 or olivia@cal-inc.com and we will gladly assist. Thank you again for your patronage.

2.0 Visual Inspection

The visual inspection consisted of a review of the client's selected suspect asbestos containing materials (ACM) within referenced property above. Materials that were determined to be suspect ACM and may be disturbed were quantified in square foot (SF) or linear feet (LF), given a classification of good, damaged or significantly damaged and assessed for friability.

Materials are also broken into classification, Surfacing, Thermal Systems Insulation (TSI) and Miscellaneous. Surfacing material is material that is sprayed, troweled-on or otherwise applied to surfaces such as acoustical plaster on ceilings and fireproofing materials on structural members, or other materials on surfaces for acoustical, fireproofing, and/or decorative purposes. TSI means material applied to pipes, fittings, boilers, breeching, tanks, ducts or other structural components to prevent heat loss or gain.

The condition of asbestos containing materials is classified according to its friability, the current state of condition and its potential for disturbance. The current state of condition is broken up into three categories:

Significantly Damaged: Over 10% evenly distributed damage or over 25% of the localized damage.
Damaged: Less than 10% evenly distributed damage or less than 25% of the localized damage.
Good: No visible damage or very little damage.

The EPA classifies materials as friable or non-friable forms of ACM. A friable material is any material that can be crumbled, pulverized or reduced to powder by hand pressure. Non-friable materials cannot be crumbled, pulverized or reduced to powder by hand pressure. Any suspect material can become friable if enabled and will fall under various local, state and federal regulations.

The EPA (Environmental Protection Agency) breaks non-friable materials into two categories:

- Category I Non-Friable Material - Asbestos packing's, Gaskets, Resilient Floor Covering and Asphalt Roofing Products.
- Category II Non-Friable Material - Any non-friable ACM that is not included in Category I

Regulated Asbestos-Containing Material" (RACM) is (a) friable asbestos material, (b) Category I non-friable ACM that has become friable, (c) Category I non-friable ACM that will be or has been subjected to sanding, grinding, cutting or abrading, or (d) Category II non-friable ACM that has a high probability of becoming or has become crumbled, pulverized, or reduced to powder by the forces expected to act on the material in the course of demolition or renovation operations.

3.0 Sample Collection

Nineteen (19) bulk samples were collected from the subject property. To collect the analytical data, CALINC Training, LLC. collects homogeneous PLM bulk asbestos samples from affected materials. Sampling is conducted by separating building materials into sampling designations called homogeneous areas. A Homogeneous Area is defined as a suspect material of similar age, appearance, function and texture. The samples taken are accompanied by a Chain of Custody that contains the sample number, locations, approximate quantities and condition then are submitted to an accredited laboratory for analysis using PLM.

4.0 Sample Analysis

The samples are analyzed by an accredited laboratory using the PLM (Polarized Light Microscopy) method EPA 600/R-93/116 (EPA Contracts 68024550, 68D10009, RTI No. 91U-5960-181, June 1993) Method for the Determination of Asbestos in Bulk Building Materials. Results are identified and reported into the coinciding sample. If any sample in a homogeneous material group is found to be positive, that entire material group is considered to be positive, regardless of a negative reading on another sample within the same group.

The EPA defines ACM under NESHAP regulations as materials containing >1% as analyzed using PLM. If a material is found to be <1% asbestos the sample can be analyzed by Point Count Method. If the point count

is successful with readings of >0.1% but <1%, the material can be disposed of as regular construction debris and considered ACCM (Asbestos Containing Construction Material) however the material is still regulated by Cal/OSHA in 8 CCR 1529. If any homogeneous material is found to contain asbestos as defined by the EPA and OHSA and will be disturbed, abatement procedures will be required by a DOSH registered licensed asbestos abatement contractor.

5.0 Sample Results

The samples collected from the referenced property were submitted to EMSL Analytical located in San Leandro, CA and analyzed by PLM method EPA 600/R-93/116. The figure below summarizes the analytical results for the homogeneous materials collected:

Figure 1: PLM Bulk Sample Results & Observations
See attached laboratory report and chain of custody – Table/Chart is created in conjunction with the chain of custody.

6.0 Conclusions

The purpose of this survey was for a planned demolition of the structure(s) on site. Based on the PLM analytical results of the samples collected, materials within the referenced property are positive asbestos containing material (ACM). If the referenced materials above are to be disturbed, at a minimum a CSLB Licensed Contractor with a C-22 asbestos abatement endorsement and DOSH (Department of Occupational Safety & Health) registration, can conduct the removal and/or abatement method. CALINC Training, LLC. recommends additional analysis of any sample analyzed to contain <1% (For an additional Fee). Further analysis could determine the material as Non-Hazardous waste if successful (potentially lower disposal cost).

7.0 Limitations

The scope of work included a visual inspection, sample collection and/or laboratory analysis to support our findings. This report has been developed to provide the client with information regarding apparent conditions related to limited accessible building materials and/or airspace/containment at the referenced property requested by the client and CALINC Training, LLC. does not guarantee that all suspect materials, airspace or household/industrial hazards have been identified, sampled or included in this survey. Due to the nature of the work, there is a possibility that conditions exist that could not be identified within the scope of the assessment or which were not apparent at the time of our site assessment. The inspection is only to identify hazards regarding the reference test type selected by the client. Although CALINC Training, LLC. attempts to identify all possible hazards within the contained areas and/or work areas, we are not responsible for unidentified, unrelated hazards within such areas (suspect microbial damage, lead contamination, water damage and termite damage etc.) CALINC Training, LLC. bears no responsibility for the actual condition of the structure or safety of a site pertaining to all hazards regardless of any actions taken by the client. To collect the analytical data, random bulk samples and/or area air samples were collected from the subject property at the direction of the client in reference to the damage and/or affected area. The samples taken are accompanied by a Chain of Custody and transported to a laboratory. Any samples collected have been

submitted and analyzed by an industry recognized and/or accredited laboratory using the specified method referenced on the attached chain of custody, laboratory findings etc. CALINC Training, LLC. is not responsible nor takes any responsibility for analysis performed by the contracted laboratory. In addition, this report is not intended to provide any certificate of clearance, passage, or designation of an area to be safe. The inspector's samples are used as a tool to provide data regarding the current condition of the premises at the direction of the client. Although CALINC Training, LLC. believes that the findings and conclusions provided in this report are reasonable, the survey/assessment is limited to the conditions observed, sample results and to the information available at the time of the inspection. CALINC Training, LLC. is not responsible for any damage caused by our sampling methods.

CALINC Training, LLC. is committed to providing industry leading customer service. If you have any questions or concerning the information within this letter report, please feel free to contact the undersigned at 707-446-7996. On behalf of CALINC Training, LLC., we greatly appreciate the opportunity to assist with your assessment needs.

APPENDIX A – CERTIFICATIONS

KENNETH RODRIGUEZ-PRAEGER
CERTIFIED ASBESTOS CONSULTANT
DOSH CAC# 19-66603

State of California
Division of Occupational Safety and Health
Certified Asbestos Consultant

Kenneth R Praeger
Name

Certification No. 19-6603

Expires on 10/16/23

This certification was issued by the Division of Occupational Safety and Health as authorized by Sections 7180 et seq. of the Business and Professions Code.

APPENDIX B- ANALYTICAL RESULTS

SEE ATTACHED PAGES FOR ANALYTICAL RESULTS

EMSL Analytical, Inc.

464 McCormick Street San Leandro, CA 94577

Tel/Fax: (510) 895-3675 / (510) 895-3680

http://www.EMSL.com / sanleandrolab@emsl.com

EMSL Order: 092320432
Customer ID: EENV42
Customer PO:
Project ID:

Attention: Info

Phone: (626) 848-6962
Fax:
Received Date: 09/19/2023 11:15 AM
Analysis Date: 09/22/2023
Collected Date: 09/18/2023

Project: CAPE VIS - 44000 CA HWY 1, WESTPORT, CA - CABIN, BARRACKS, AND GARAGE

Test Report: Asbestos Analysis of Bulk Materials via AHERA Method 40CFR 763 Subpart E Appendix E supplemented with EPA 600/R-93/116 using Polarized Light Microscopy

			Non-Asbestos		Asbestos
Sample	**Description**	**Appearance**	**% Fibrous**	**% Non-Fibrous**	**% Type**
HA-01-01-Drywall *092320432-0001*	DRYWALL & JOINT COMPOUND - N. END OF CABIN	White Non-Fibrous Homogeneous		80% Gypsum 20% Non-fibrous (Other)	None Detected
HA-01-01-Joint Compound *092320432-0001A*	DRYWALL & JOINT COMPOUND - N. END OF CABIN	White Non-Fibrous Homogeneous		80% Ca Carbonate 18% Non-fibrous (Other)	2% Chrysotile
HA-01-02-Drywall *092320432-0002*	DRYWALL & JOINT COMPOUND - CENTER OF CABIN	White Non-Fibrous Homogeneous		80% Gypsum 20% Non-fibrous (Other)	None Detected
HA-01-02-Joint Compound *092320432-0002A*	DRYWALL & JOINT COMPOUND - CENTER OF CABIN	White Non-Fibrous Homogeneous		80% Ca Carbonate 18% Non-fibrous (Other)	2% Chrysotile
HA-01-03-Drywall *092320432-0003*	DRYWALL & JOINT COMPOUND - S. END OF CABIN	White Non-Fibrous Homogeneous		80% Gypsum 20% Non-fibrous (Other)	None Detected
HA-01-03-Joint Compound *092320432-0003A*	DRYWALL & JOINT COMPOUND - S. END OF CABIN	White Non-Fibrous Homogeneous		80% Ca Carbonate 18% Non-fibrous (Other)	2% Chrysotile
HA-01-03-DW/JC Composite *092320432-0003B*	DRYWALL & JOINT COMPOUND - S. END OF CABIN	White Non-Fibrous Homogeneous		15% Ca Carbonate 70% Gypsum 15% Non-fibrous (Other)	<1% Chrysotile
HA-02-04-Vinyl Floor Tile *092320432-0004*	9 X 9 VFT & MASTIC - N. END OF CABIN	Brown Non-Fibrous Homogeneous		60% Matrix 38% Non-fibrous (Other)	2% Chrysotile
HA-02-04-Mastic *092320432-0004A*	9 X 9 VFT & MASTIC - N. END OF CABIN	Black Non-Fibrous Homogeneous		80% Matrix 20% Non-fibrous (Other)	None Detected
HA-02-05-Vinyl Floor Tile *092320432-0005*	9 X 9 VFT & MASTIC - S. END OF CABIN	Brown Non-Fibrous Homogeneous		60% Matrix 38% Non-fibrous (Other)	2% Chrysotile
HA-02-05-Mastic *092320432-0005A*	9 X 9 VFT & MASTIC - S. END OF CABIN	Black Non-Fibrous Homogeneous		80% Matrix 20% Non-fibrous (Other)	None Detected
HA-03-06-Cove Base *092320432-0006*	BLACK COVE BASE & MASTIC - E. END OF CABIN	Black Non-Fibrous Homogeneous		70% Matrix 30% Non-fibrous (Other)	None Detected
HA-03-06-Mastic *092320432-0006A*	BLACK COVE BASE & MASTIC - E. END OF CABIN	Brown Non-Fibrous Homogeneous		80% Matrix 20% Non-fibrous (Other)	None Detected
HA-03-07-Cove Base *092320432-0007*	BLACK COVE BASE & MASTIC - W. END OF CABIN	Black Non-Fibrous Homogeneous		70% Matrix 30% Non-fibrous (Other)	None Detected

Initial report from: 09/22/2023 16:33:06

EMSL Analytical, Inc.
464 McCormick Street San Leandro, CA 94577
Tel/Fax: (510) 895-3675 / (510) 895-3680
http://www.EMSL.com / sanleandrolab@emsl.com

EMSL Order: 092320432
Customer ID: EENV42
Customer PO:
Project ID:

Test Report: Asbestos Analysis of Bulk Materials via AHERA Method 40CFR 763 Subpart E Appendix E supplemented with EPA 600/R-93/116 using Polarized Light Microscopy

			Non-Asbestos		Asbestos
Sample	**Description**	**Appearance**	**% Fibrous**	**% Non-Fibrous**	**% Type**
HA-03-07-Mastic *092320432-0007A*	BLACK COVE BASE & MASTIC - W. END OF CABIN	Brown Non-Fibrous Homogeneous		80% Matrix 20% Non-fibrous (Other)	None Detected
HA-04-08 *092320432-0008*	CONCRETE FOUNDATION - N. END OF CABIN	Gray Non-Fibrous Homogeneous		40% Quartz 40% Ca Carbonate 20% Non-fibrous (Other)	None Detected
HA-04-09 *092320432-0009*	CONCRETE FOUNDATION - S. END OF CABIN	Gray Non-Fibrous Homogeneous		40% Quartz 40% Ca Carbonate 20% Non-fibrous (Other)	None Detected
HA-05-10-Sealant 1 *092320432-0010*	BLACK/WHITE WALL SEALANT - N. END OF BARRACKS	Black Non-Fibrous Homogeneous		80% Matrix 14% Non-fibrous (Other)	6% Chrysotile
HA-05-10-Sealant 2 *092320432-0010A*	BLACK/WHITE WALL SEALANT - N. END OF BARRACKS	White Non-Fibrous Homogeneous		80% Matrix 17% Non-fibrous (Other)	3% Chrysotile
HA-05-11-Sealant 1 *092320432-0011*	BLACK/WHITE WALL SEALANT - S. END OF BARRACKS	White Non-Fibrous Homogeneous		80% Matrix 17% Non-fibrous (Other)	3% Chrysotile
HA-05-11-Sealant 2 *092320432-0011A* *No black sealant present.*	BLACK/WHITE WALL SEALANT - S. END OF BARRACKS				Layer Not Present
HA-06-12 *092320432-0012*	CONCRETE FOUNDATION - N. END OF BARRACKS	Gray Non-Fibrous Homogeneous		40% Quartz 40% Ca Carbonate 20% Non-fibrous (Other)	None Detected
HA-06-13 *092320432-0013*	CONCRETE FOUNDATION - S. END OF BARRACKS	Gray Non-Fibrous Homogeneous		40% Quartz 40% Ca Carbonate 20% Non-fibrous (Other)	None Detected
HA-07-14 *092320432-0014*	WINDOW PUTY - N. END OF BARRACKS	White Non-Fibrous Homogeneous		70% Matrix 30% Non-fibrous (Other)	None Detected
HA-07-15 *092320432-0015*	WINDOW PUTY - S. END OF BARRACKS	White Non-Fibrous Homogeneous		70% Matrix 30% Non-fibrous (Other)	None Detected
HA-08-16 *092320432-0016*	CONCRETE FOUNDATION - N. END OF GARAGE	Gray Non-Fibrous Homogeneous		40% Quartz 40% Ca Carbonate 20% Non-fibrous (Other)	None Detected
HA-08-17 *092320432-0017*	CONCRETE FOUNDATION - S. END OF GARAGE	Gray Non-Fibrous Homogeneous		40% Quartz 40% Ca Carbonate 20% Non-fibrous (Other)	None Detected
HA-09-18 *092320432-0018*	VAPOR BARRIER PAPER - W. END OF GARAGE	Black Fibrous Homogeneous	70% Cellulose	15% Matrix 15% Non-fibrous (Other)	None Detected
HA-09-19 *092320432-0019*	VAPOR BARRIER PAPER - S. END OF GARAGE	Black Fibrous Homogeneous	70% Cellulose	15% Matrix 15% Non-fibrous (Other)	None Detected

Initial report from: 09/22/2023 16:33:06

EMSL Analytical, Inc.

464 McCormick Street San Leandro, CA 94577

Tel/Fax: (510) 895-3675 / (510) 895-3680

http://www.EMSL.com / sanleandrolab@emsl.com

EMSL Order:	092320432
Customer ID:	EENV42
Customer PO:	
Project ID:	

Analyst(s)

Xeena Paul (28)

Cecilia Yu, Laboratory Manager
or Other Approved Signatory

Initial report from: 09/22/2023 16:33:06

APPENDIX C- CHAIN OF CUSTODY

SEE ATTACHED PAGES FOR CHAIN OF CUSTODY

OrderID: 092320432

092320432

CALINC TRAINING LLC

Date: 9-18-23	**Technician:** Rodriguez-Praeger
Project Number:	**License Type & #:** CAC
Project Name: Cape Vis	
Project Address: 44000 CA HWY 1, Westport, CA	
Primary Areas Assessed: Cabin, Barracks, and Garage	

Company Information: CALINC Training, LLC.	
Address: 2040 Peabody Rd, Ste 400, Vacaville, CA 95687	
Phone: 707.446.7996	**Email:** olivia@cal-inc.com

Laboratory: EMSL	**TAT:** 3-5 Day
Analysis Type: ☑ - Asbestos PLM Bulk - (EPA 600/R-93/116)	
☐ - Other: _____	

Sample #	Description	Condition	Class	Quantity	Sample Locations	EPA Category	Laboratory Results
HA-01-01 02 03	Drywall & Joint Compound	Good	Misc	~1000sqft	N. End of Cabin Center of Cabin S. End of Cabin	RACM (Unless Point Counted)	2% Chrysotile
HA-02-04 05	9x9 VFT & Mastic	Good	Misc	~500sqft	N. End of Cabin S. End of Cabin	CAT I	2% Chrysotile (Tile) None Detected (Mastic)
HA-03-06 07	Black Cove Base & Mastic	Good	Misc	~50sqft	E. End of Cabin W. End of Cabin	N/A	None Detected
HA-04-08 09	Concrete Foundation	Good	Misc	~500sqft	N. End of Cabin S. End of Cabin	N/A	None Detected
HA-05-10 11	Black/White Wall Sealant	Good	Misc	~100sqft	N. End of Barracks S. End of Barracks	CAT I	6% Chrysotile
HA-06-12 13	Concrete Foundation	Good	Misc	~1000sqft	N. End of Barracks S. End of Barracks	N/A	None Detected
HA-07-14 15	Window Puty	Good	Misc	~50sqft	N. End of Barracks S. End of Barracks	N/A	None Detected

Relinquished: Kenneth Rodriguez-Praeger
Date: 9-18-23

Received by Lab: WIF
Date: 9-19-23 11:15AM

OrderID: 092320432

092320432

Project Number: _____ Page: 2 of 2

Sample #	Description	Condition	Class	Quantity	Sample Locations	EPA Category	Laboratory Results
HA-08-16 17	Concrete Foundation	Good	Misc	~500sqft	N. End of Garage S. End of Garage	N/A	None Detected
HA-09-18 19	Vapor Barrier Paper	Good	Misc	~1000sqft	W. End of Garage S. End of Garage	N/A	None Detected
PACM					- Possible Transite Pipes located in Cabin building above wall unit & water heater	CAT II	Assumed >10% Chrysotile

Relinquished: Kenneth Rodriguez-Praeger
Date: 9-18-23

Received by Lab: M WIZ
Date: 9-19-23 1:05PM

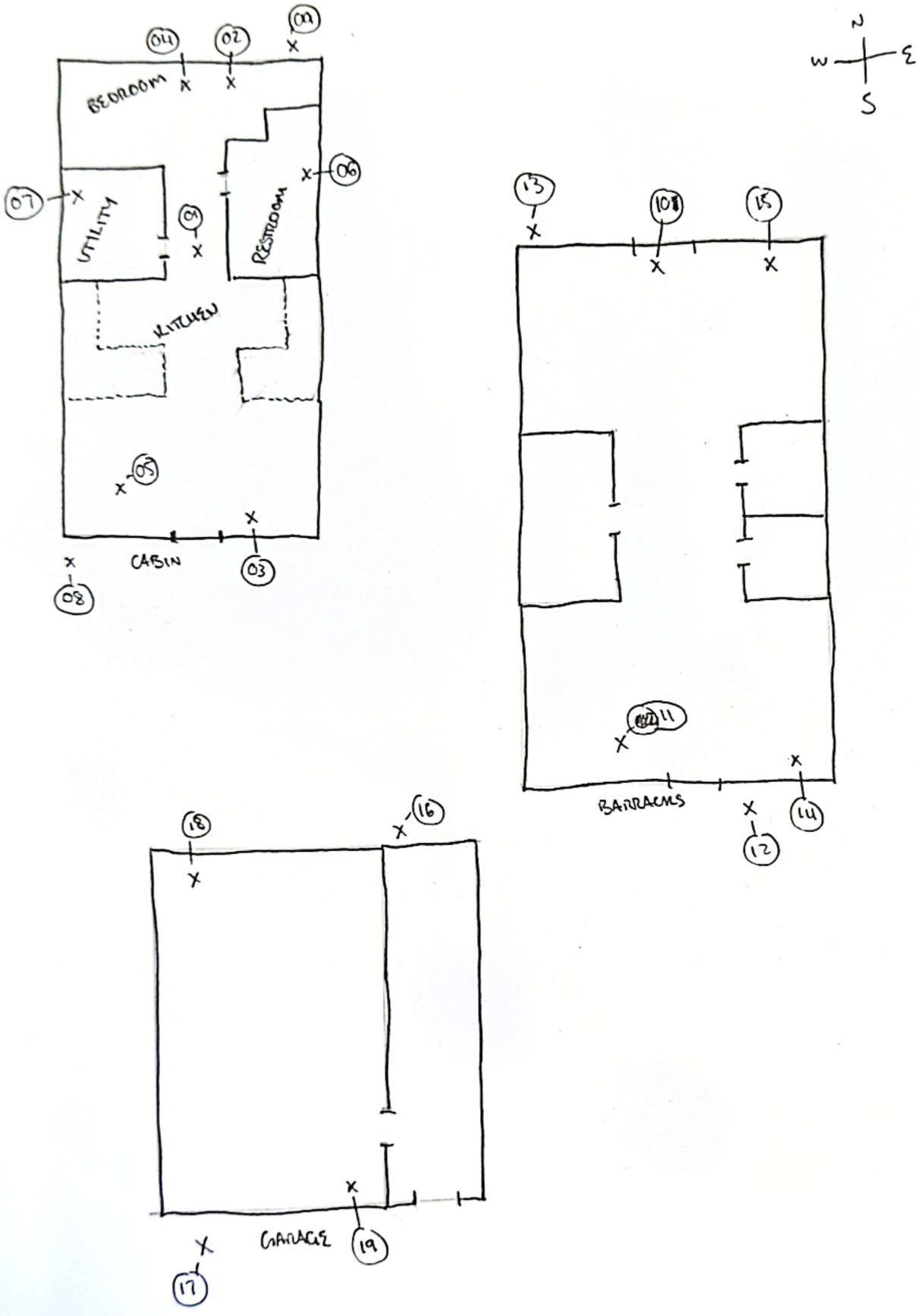
APPENDIX D- SITE DIAGRAM

SEE ATTACHED PAGES SITE DIAGRAM

23-0804

CAPS VIS

44000 N. HWY 1, WEST POINT, CA 94545488



APPENDIX E - PHOTOS

SEE ATTACHED PAGES FOR PHOTOS