STATE OF CALIFORNIA – THE RESOURCES AGENCY

RECORD PACKET COPY

PETE WILSON, Governor

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W12a

Filed: 01/24/97
49th day: 03/14/97
180th day: 07/23/97
Staff: SG
Staff Report: 02/13/97
Hearing Date: 03/11-14/97

STAFF REPORT
REGULAR

APPLICATION NUMBER: **3-96-104**

APPLICANT: **CALIFORNIA DEPARTMENT OF PARKS AND RECREATION**

PROJECT LOCATION: Along State Park Road from intersection with South Bay Blvd. approximately 700 feet to the southeast, City of Morro Bay

PROJECT DESCRIPTION: Restoration of hydrologic regime and native palustrine emergent wetland species and removal of invasive exotic woody vegetation in extremely degraded wetland; and grading to elevate existing State Park Road to conform road geometry with South Bay Boulevard, improve drainage, and reduce flooding.

LOCAL APPROVALS RECEIVED: Not Applicable

SUBSTANTIVE FILE DOCUMENTS: Morro Bay Coastal Development Permit CDP 52-95/CUP28-95 (Twin Bridges Replacement), Consistency Certification CC-38-95 (Twin Bridges Replacement), Twin Bridges Replacement Project EIS/R, Morro Bay LCP, Coastal Commission Statewide Interpretive Guidelines for Wetlands and other Wet Environmentally Sensitive Habitats.

SUMMARY OF STAFF RECOMMENDATION

Staff recommends **approval** of the proposal with conditions requiring submittal of a restoration schedule and regular monitoring reports. Project will result in correction of persistent flooding problem on a State Park access road and restoration of the adjacent severely degraded wetland

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EXHIBITS

1. Location map
2. Site map with habitats
3. Preliminary Plan for Elevating Road
4. Letter from City relinquishing permit authority

I. STAFF RECOMMENDATION

Staff recommends that the Commission adopt the following resolution:

Approval with Conditions

The Commission hereby grants a permit, subject to the conditions below, for the proposed development on the grounds that the development will be in conformity with the provisions of Chapter 3 of the California Coastal Act of 1976, is located both landward and seaward of the first through public road (State Park Road) and is in conformance with the public access and public recreation policies of Chapter 3 of the Coastal Act, will not prejudice the ability of the City of Morro Bay to implement its certified Local Coastal Program, and will not have any significant adverse impacts on the environment within the meaning of the California Environmental Quality Act.

II. STANDARD CONDITIONS

1. Notice of Receipt and Acknowledgment. The permit is not valid and development shall not commence until a copy of the permit, signed by the permitee or authorized agent, acknowledging receipt of the permit and acceptance of the terms and conditions, is returned to the Commission office.

2. Expiration. If development has not commenced, the permit will expire two years from the date this permit is reported to the Commission. Development shall be pursued in a diligent manner and completed in a reasonable period of time. Application for extension of the permit must be made prior to the expiration date.

3. Compliance. All development must occur in strict compliance with the proposal as set forth in the application for permit, subject to any special conditions set forth below. Any deviation from the approved plans must be reviewed and approved by the staff and may require Commission approval.

4. Interpretation. Any questions of intent or interpretation of any condition will be resolved by the Executive Director or the Commission.

5. Inspections. The Commission staff shall be allowed to inspect the site and the project during its development, subject to 24-hour advance notice.

6. Assignment. The permit may be assigned to any qualified person, provided assignee files with the Commission an affidavit accepting all terms and conditions of the permit.

7. Terms and Conditions Run with the Land. These terms and conditions shall be perpetual, and it is the intention of the Commission and the permittee to bind all future owners and possessors of the subject property to the terms and conditions.

III. SPECIAL CONDITIONS

1. This permit authorizes the work as described in the amended project description (see Finding 1, below) and, with regard to elevating the road, Alternative Number 1 in the Expanded Initial Study.

2. **Prior to commencement of construction or restoration, whichever occurs first**, the permittee shall provide the following to the Executive Director:

   a. a copy of the US Army Corps of Engineers permit or letter of permission.

   b. a copy of Section 401 water quality certification, or waiver, from the Regional Water Quality Control Board.

   c. a copy of approval from the Department of Fish and Game or written evidence that no approval is required from that agency.

3. **Within 60 days from the date this permit is acted upon by the Commission**, permittee shall submit to the Executive Director a schedule of the proposed restoration of the degraded wetlands, including species to be removed and species to be planted and methods of vegetation removal and planting. The schedule shall be accompanied by a detailed map of the restoration area.

4. **Prior to commencement of grading,** permittee shall identify the proposed disposal site for sediment removed from the degraded wetland area; if within the coastal zone, the disposal method and location shall be subject to prior review and approval by the Executive Director.

5. No fill material shall be placed on the southeast side of State Park Road where it would be in the enhancement and restoration area for the Twin Bridges replacement project. If necessary to avoid placement of fill in that area, permittee shall relocate State Park Road to the northwest a sufficient distance.

6. **Within 30 days of completion of grading to elevate State Park Road**, permittee shall submit two sets of as-built plans for the then-elevated State Park Road. The plans

shall clearly indicate the edges of the State Park Road fill prism before and after construction. Permittee shall also notify the Executive Director in writing upon completion of the revegetation work. The notification shall include a description of the specific work completed.

7. The project area shall be monitored for five years after revegetation. Permittee shall submit annual letter reports to the Executive Director describing any restoration work done and the percentage of vegetative cover established. If after five years the target vegetative cover is not at least 85 percent, permittee will report to the Executive Director additional/alternative actions to achieve 85 percent vegetative cover and shall extend the monitoring period until such target percentage of vegetative cover is reached.

IV. FINDINGS AND DECLARATIONS

1. **Project Location and Description:** The site of this proposal is along State Park Road from its intersection with South Bay Boulevard some 700 feet to the southwest on the eastern edge of the developed part of Morro Bay State Park in the City of Morro Bay. The proposal would accomplish several objectives: 1) restore the hydrologic regime and native palustrine emergent wetland species adjacent to State Park Road by removing sediment, recontouring, and revegetating the site, 2) remove invasive exotic woody vegetation, eucalyptus, in the palustrine emergent wetland at the southerly end of the project site and, 3) undertake grading work necessary to elevate the existing State Park Road to conform road geometry with the recently elevated South Bay Boulevard, to improve drainage, to reduce contaminants from motor vehicles from reaching the wetlands, and to reduce the frequency of flooding of State Park Road.

2. **Background:** The wetlands at the confluence of Chorro Creek and the estuary of Morro Bay are in large part degraded from their natural state. This is due to many factors although the two main factors are 1) the introduction of non-native, invasive species either accidentally (e.g., German ivy, wildrye, kikuyu grass) or intentionally (e.g., eucalyptus) and, 2) rapid increase in sedimentation.

Land use practices in this century and other factors such as wildfires have caused the sediment load carried by Chorro Creek to dramatically increase over what it had been. That in turn has raised the level of the wetland areas where Chorro Creek meets Morro Bay. The increased sediment and the presence of invasive non-native species has tended to reduce the number and areal extent of native wetland species, in some cases to the point where the wetlands have become almost wholly non-native. Approval of the recent Twin Bridges Replacement Project included measures to mitigate for impacts to the wetlands by restoring some of the degraded areas. The subject proposal would extend the restoration to additional areas within Morro Bay State Park, improving the overall quality of the wetlands in the area.

Besides the restoration of degraded wetlands, the subject proposal includes grading to elevate a portion of State Park Road which crosses through this degraded wetland area. State Park Road and South Bay Boulevard, at and near their intersection adjacent to Chorro Creek in Morro Bay State Park, have historically been subject to very frequent flooding from Chorro

Creek with South Bay Blvd. being closed at the creek crossing over 50 times in the last ten years. Typically, State Park Road has flooded with the same frequency as South Bay Blvd.

Late last year South Bay Blvd. was realigned and elevated in conjunction with the Twin Bridges Replacement Project, the construction of a new, single-span crossing of Chorro Creek in order to eliminate the recurrent flooding. The improvements to South Bay Blvd. raised the intersection with State Park Road by about eight feet, making a steep approach on State Park Road. The elevation of South Bay Blvd. did not reduce the vulnerability of State Park Road to flooding. The project proposed here would reduce the steepness of the approach to South Bay Blvd. and would raise State Park Road to an elevation above the 50 year flood level. In addition, the road work would result in improved drainage and, by raising the elevation of the road, would reduce the amount of motor vehicle hydrocarbon contaminants entering the wetlands. At present, crankcase oil drippings, etc., mix directly with wetland waters as vehicles splash through this frequently flooded road section. Also, the same contaminants accumulate on the road during the dry season, but are then washed from the road into the wetlands when the road is flooded. The proposed elevation of the road would prevent these impacts.

3. State/City Jurisdiction: The majority of the project site is in the City of Morro Bay. The Coastal Commission's area of "original" permit jurisdiction ends at the edge of the degraded wetlands adjacent to the road. Since grading activity (sediment removal, and fill for the road elevation) would occur in these wetlands, a coastal development permit from the Coastal Commission is necessary. The City has a certified Local Coastal Program; typically a coastal development permit would be required from the City for the part of the proposal in the City's permit jurisdiction. However, the City has relinquished its permit authority for this proposal to the Coastal Commission (see Exhibit 4). Therefore only a Coastal Commission coastal development permit is necessary.

4. Coastal Resource Issues: Restoration of the wetlands, like any development, must be consistent with Coastal Act policies. However, restoration is one of the goals of the Coastal Act and so even though it must be done carefully to ensure success, it is considered beneficial. The other part of this proposal, grading and filling to elevate the existing State Park access road, demands much greater scrutiny, since it would result in the placement of fill within the wetland, however small and degraded. Because of this, much of the following is directed toward analysis of the grading and filling necessary to elevate the road.

a. Public Access: Section 30210 of the Coastal Act provides for maximum public access to the shore and recreational opportunities consistent with, among other things, public safety.

In carrying out the requirement of Section 4 of Article X of the California Constitution, maximum access, which shall be conspicuously posted, and recreational opportunities shall be provided for all the people consistent with public safety needs and the need to protect public rights, rights of private property owners, and natural resource areas from overuse.

State Park Road makes a loop through the main part of Morro Bay State Park where a campground, visitor center, marina, golf course, and park support facilities (offices, shops, residences) are located. The road runs from South Bay Blvd. on the east side of the park to Main Street on the west side of the park. State Park Road is the only route into and out of the park. When State Park Road floods or is otherwise closed, the only way into and out of Morro Bay State Park is via Main Street. Park traffic then doubles on Main Street adding to the

existing residential and commercial traffic. In order to leave the park all vehicles entering it must turn around in the park where there is no established turn-around area. Vehicles can turn around in existing parking areas, if parked cars do not block turning movements, but a traffic hazard can be created. In addition, a large, undeveloped portion of the park lies across Chorro Creek east of the developed part of the park and when State Park Road floods, park personnel and park emergency vehicles have to travel two and one-half miles on city streets to go from one part of the park to the other.

These situations reduce recreational opportunities and public access to the shore by creating congestion and obstructing access between parts of the park. By elevating State Park Road above the 50 year flood level, the incidence of flooding will be largely eliminated and with it, the deleterious effects on access and recreational opportunities. In addition, public safety will be enhanced when the road is less subject to flooding. Therefore, the proposal is consistent with Coastal Act policy 30210.

b. Wetlands Fill. Section 30231 of the Coastal Act requires that the biological productivity and quality of coastal wetlands and estuaries be maintained, and where feasible, restored. Section 30233 of the Coastal Act permits filling of wetlands and estuaries where there is no feasible less environmentally damaging alternative, where feasible mitigation measures have been provided to minimize adverse environmental effects, and only in the following cases:

(a) The diking, filling, or dredging of open coastal waters, wetlands, estuaries, and lakes shall be permitted in accordance with other applicable provisions of this division, where there is no feasible less environmentally damaging alternative, and where feasible mitigation measures have been provided to minimize adverse environmental effects, and shall be limited to the following. . .

(5) Incidental public service purposes, including but not limited to, burying cables and pipes or inspection of piers and maintenance of existing intake and outfall lines. . .

(7) Restoration purposes.

(8) Nature study, aquaculture, or similar resource dependent activities.

(c) In addition to the other provisions of this section, diking, filling, or dredging in existing estuaries and wetlands shall maintain or enhance the functional capacity of the wetland or estuary. Any alteration of coastal wetlands identified by the Department of Fish and Game, including, but not limited to, the 19 coastal wetlands identified in its report entitled, "Acquisition Priorities for the Coastal Wetlands of California", shall be limited to very minor incidental public facilities, restorative measures . . . if otherwise in accordance with this division.

Issue: Can the placement of fill in coastal wetlands to elevate a road in conjunction with the restoration and enhancement of wetlands be found to be a permitted type of fill in coastal waters?

Analysis: The Expanded Initial Study for this proposal draws heavily from the Environmental Impact Statement/Report prepared for the Twin Bridges replacement project for its environmental analysis. That is appropriate since enhancing the wetlands along State Park

Road would take place immediately adjacent to the areas of impact and enhancement from the Twin Bridges project.

The area of wetland fill would occur on severely degraded palustrine emergent wetlands which are locally dominated by *Leymus triticoites* (creeping wildrye), *Pennisetum clandestine* (kikuyu grass), *Baccharis douglasii* (marsh baccharis), and *Picris echioides* (bristly ox-tongue) on the southeastern side of the road and by kikuyu grass on the northwestern side of the road. In addition, non-native woodlands exist along the extreme southwesterly end of the project. This woodland is dominated by *Eucalytpus globulus* (blue gum) on both sides of State Park Road. Areal cover of the eucalyptus overstory is approximately 0.3 acre. Understory species include marsh baccharis and creeping wildrye on the southeastern side of the road and *Senecio mikanoides* (German ivy) on the northwestern side of the road.

According to the Environmental Impact Statement/Report for the Twin Bridges project and the Expanded Initial Study for the subject proposal, no state or federal threatened and endangered species are known to occur in the project area. The red-legged frog could potentially be found at the project site but this is unlikely due to the lack of permanent freshwater and associated emergent vegetation.

The road is proposed to be elevated up to approximately five feet above existing grade at and near its intersection with South Bay Boulevard, tapering off to the existing grade some 700 feet southwest of the intersection. The existing road consists of two, ten foot wide travel lanes and informal shoulders of varying width. The elevated road would consist of two, ten foot wide travel lanes and shoulders uniformly three feet wide. Since the fill material would be at a 2:1 slope, fill would extend beyond the edges of the existing road with some of it in the adjacent (severely degraded) wetlands. However, most of the fill would not be in the wetlands because of the existing informal shoulders. The proposal would place approximately 1511 cubic yards of fill on the existing alignment. Approximately 652 cubic yards of the fill would be in the wetlands. The total area of disturbance to the wetlands would be approximately 4230 square feet (just under 0.1 acre).

Section 30233(a) sets up four tests which must be answered affirmatively if placement of fill in wetlands is to be approved, as follows:

1) Is the filling in accordance with other applicable provisions of the Coastal Act? Based on the other findings in this staff report, the filling proposed by the Department of Parks and Recreation is in accordance with the other applicable provisions of the Coastal Act.

2) Is there no feasible less environmentally damaging alternative? In its Expanded Initial Study, the Department of Parks and Recreation (DPR) considered two alternatives for elevating the road. Alternative 1 would consist of 2, 10 foot travel lanes and 2, 3 foot shoulders with a 2:1 fill slope. This alternative would result in approximately 4,230 square feet (just under 0.1 acre) of fill being placed in the wetland. Alternative 2 would consist of the same number and width of travel lanes and shoulders. However, Alternative 2 would be constructed utilizing retaining walls on either side of the road to support the new fill. This would reduce the amount of fill placed in the wetland to approximately 3,600 square feet (0.08 acre). Although not analyzed by DPR, there could conceivably be a hypothetical Alternative 3, elevating the road utilizing retaining walls and eliminating the shoulders.

Alternative 1 would be the easiest and least costly alternative (approximately $96,000), but would have the most impact on wetlands. Alternative 2 would be the most costly (approximately $160,000; 66 percent more expensive than Alternative 1) but would have only slightly less wetland impact than Alternative 1 (approximately 0.02 acre, 870 square feet, less). Guardrails would have to be placed along the elevated section of State Park Road since there would be no gentle fill slope on the sides of the road. The guardrails would degrade the existing views along the road. It is unknown how much the hypothetical Alternative 3 would cost but it would probably be closer to the costs of Alternative 2 than to Alternative 1 since the most expensive aspect would be the retaining walls.

Alternative 3 would presumably have the least impact on wetlands, although the exact amount of wetland that would be affected by that hypothetical alternative is unknown. It would, like Alternative 2, require the installation of guardrails, but lacking shoulders would present severe safety concerns for bicyclists and pedestrians. Therefore, it would appear infeasible. Alternatives 1 and 2 are both feasible, but Alternative 2 would not be significantly "less environmentally damaging."

Given the condition of the wetland, the proposed mitigation, and the great increase in the cost of Alternative 2 (and presumably hypothetical Alternative 3) over Alternative 1 for such little reduction of impacts, Alternative 1 for practical purposes meets the test of "no feasible less environmentally damaging alternative."

3) Have feasible mitigation measures been provided to minimize adverse environmental impacts? The Expanded Initial Study states: *"Although portions of the affected area consist of lower-value habitat, that is, areas dominated by invasive exotic species such as eucalyptus and kikuyu grass, wetland habitat will be replaced at a 2:1 ratio."* This is the same ratio used for palustrine forested wetland impact mitigation in the Twin Bridges project, adjacent to the subject site. That project mitigated other wetland impacts, including those to palustrine emergent wetland at a 1:1 ratio. The subject proposal would, then, mitigate at a ratio twice that of the Twin Bridges mitigation. Moreover, the mitigation here would restore and enhance severely degraded wetlands which have very little natural wetland function at present. Therefore, the proposed work would result in the rehabilitation of severely degraded wetlands which would more than offset (minimize) any possible adverse environmental impacts. And, elevation of the road is itself a mitigation measure, as it will eliminate the hydrocarbon contamination effects that result from motor vehicles splashing through the persistently flooded road section. Finally, the proposed rebuilding of the road has included design measures, particularly adherence to the minimum possible width (10-ft. travel lanes, 3-ft. shoulders) to minimize the amount of fill needed to support the roadway. (Compare to the standard 12-ft. travel lane, 4-ft. shoulder model.)

4) Does the filling represent one of the eight allowable purposes for fill of wetlands? In permit 3-92-47, issued to the County of San Luis Obispo for the widening of Pier Avenue over Oceano Lagoon from two lanes to four in the community of Oceano, the Commission approved fill in the lagoon in the form of bridge pilings. The pilings amounted to approximately 871 square feet of fill. The widened bridge also affected the wetland by shading approximately 3,500 square feet whereas the two lane bridge had shaded only approximately 1,300 square feet of wetland. More recently, and just adjacent to the subject site, the Commission concurred with the federal consistency determination made by the City of Morro Bay and Caltrans for the Twin Bridges Replacement Project. That project resulted in fill covering 1.02 acres of degraded wetland.

In the Twin Bridges consistency determination, the Commission found *". . . that some roads and bridges will require repair, maintenance, or improvements that require wetland fill. The Commission's past policy, as adopted in the . . .Wetland Guidelines and past cases, allows fill associated with road work, if that work does not result in an increase in traffic capacity of the road. . . . Therefore, the Commission finds that the proposed project can be considered an allowable use as an incidental public service, pursuant to Section 30233(a)(5) of the Coastal Act, based on the Commission's historic interpretation under its Wetland Guidelines."*

Wetland fill for road improvement purposes where there is no increase in traffic capacity has been found to be an allowable use under Coastal Act section 30233(a)(5). The wetland fill for elevating State Park Road would be in conjunction with restoration of the severely degraded wetlands along the road. Thus, the proposed fill is also consistent with Coastal Act section 30233(a)(7) which allows fill for the purposes of restoration.

Conclusion: In limited, specific circumstances, filling of wetlands for the purposes of road improvement and restoration activities is an allowable use. Therefore, the placement of fill in the subject severely degraded wetlands to elevate State Park Road in conjunction with the restoration and enhancement of those wetlands is a permitted type of fill in coastal wetlands, consistent with Coastal Act section 30233.

c. Coastal Hazards: Coastal Act section 30253 requires, among other things, that development :

1) Minimize risks to life and property in areas of high geologic, flood, and fire hazard.

Elevating the road would decrease the risk of flooding and thereby minimize risks to life and property in a flood hazard area. Therefore the road elevation is consistent with Coastal Act section 30253.

d. Marine Resources: Section 30230 of the Coastal Act states the following:

Marine resources shall be maintained, enhanced, and where feasible, restored. Special protection shall be given to areas and species of special biological or economic significance. Uses of the marine environment shall be carried out in a manner that will sustain the biological productivity of coastal waters and that will maintain healthy populations of all species of marine organisms adequate for long-term commercial, recreational, scientific, and educational purposes.

Section 30231 of the Coastal Act states the following:

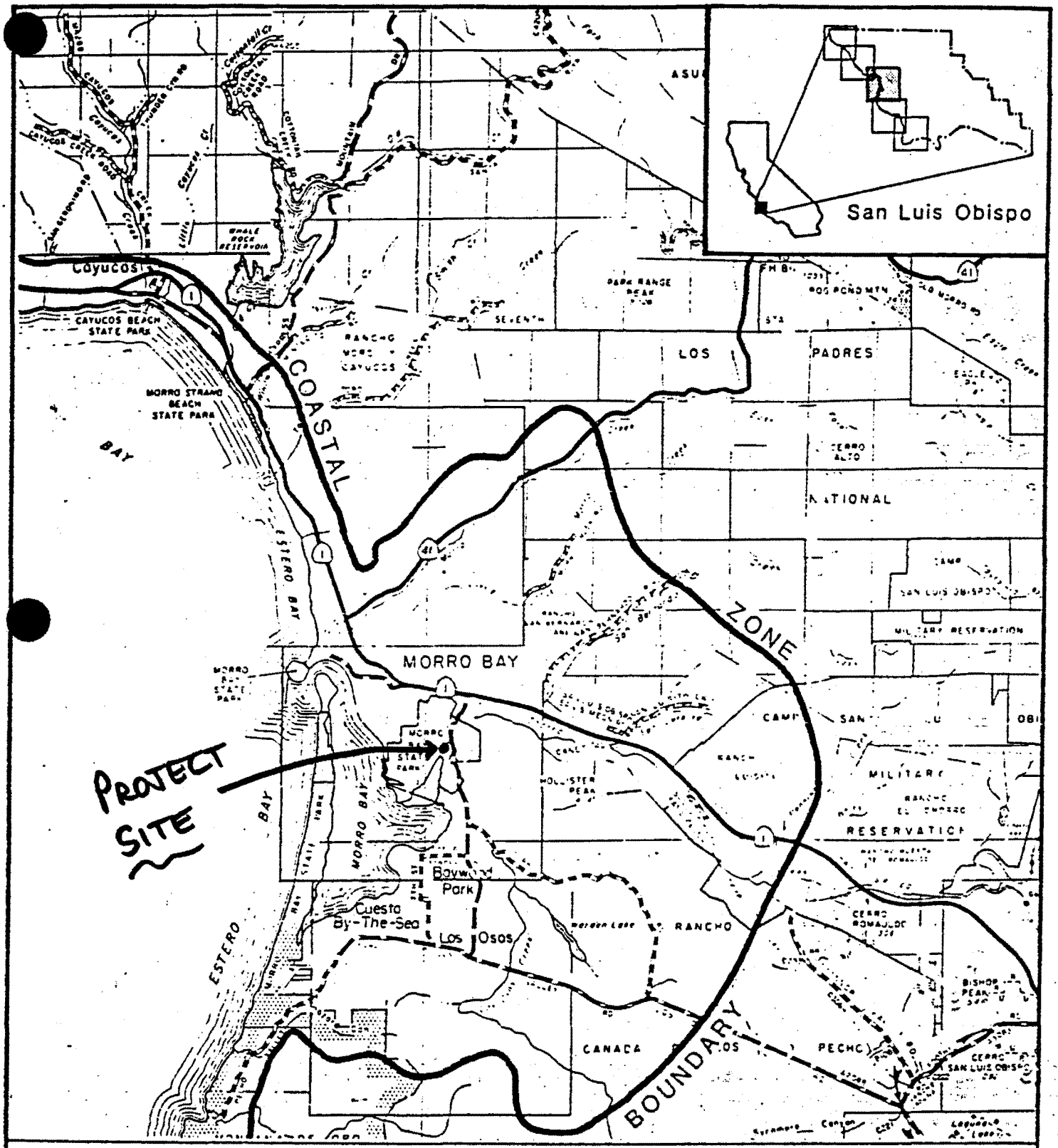
The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface water flow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.

This proposal includes restoration of severely degraded wetlands. The intent is to return the wetland to one that would enhance the biological productivity and quality of the waters of the estuary of Morro Bay. The applicant has proposed monitoring of the restoration for a period of five

years in order to ensure success. Special Condition 3 Special requires the applicant to prepare a schedule of revegetation and a list of proposed species for submittal to the Executive Director for review and approval. This will allow for changes, if necessary, to the proposed schedule and species to be utilized to ensure that the wetlands are restored in a way that will enhance biological productivity and quality of the wetlands and the waters of Morro Bay. Special Condition 7 requires that at the end of the monitoring period the vegetative cover of native species be at least 85 percent of the area involved and that additional enhancement and restoration take place if the target percentage is not met. Therefore, as conditioned, the proposal is consistent with Coastal Act policies 30230 and 30231.

5. Consistency with the City Local Coastal Program (LCP) and the California Environmental Quality Act (CEQA): The proposed work lies within the City of Morro Bay, though part of the project lies in the Commission's mapped area of retained original permit jurisdiction. The Commission has certified a Local Coastal Program for the City which contains policies for the protection and enhancement of wetlands. As conditioned, the project is consistent with these policies and will not impair the City's ability to apply its relevant LCP policies to other wetland restoration and enhancement projects that may be proposed in the future.

The Commission agrees with the analysis and conclusions of the expanded initial study prepared by the Department of Parks and Recreation for this proposal. In addition, the Coastal Commission's permit process is the functional equivalent of the environmental review process under CEQA. Accordingly, the proposed project as conditioned is consistent with the California Coastal Act and will not create any significant adverse environmental impacts within the meaning of CEQA.



LOCATION MAP

California Coastal Commission

County of San Luis Obispo

EXHIBIT 1

3-96-104

Sheet 3 of 5

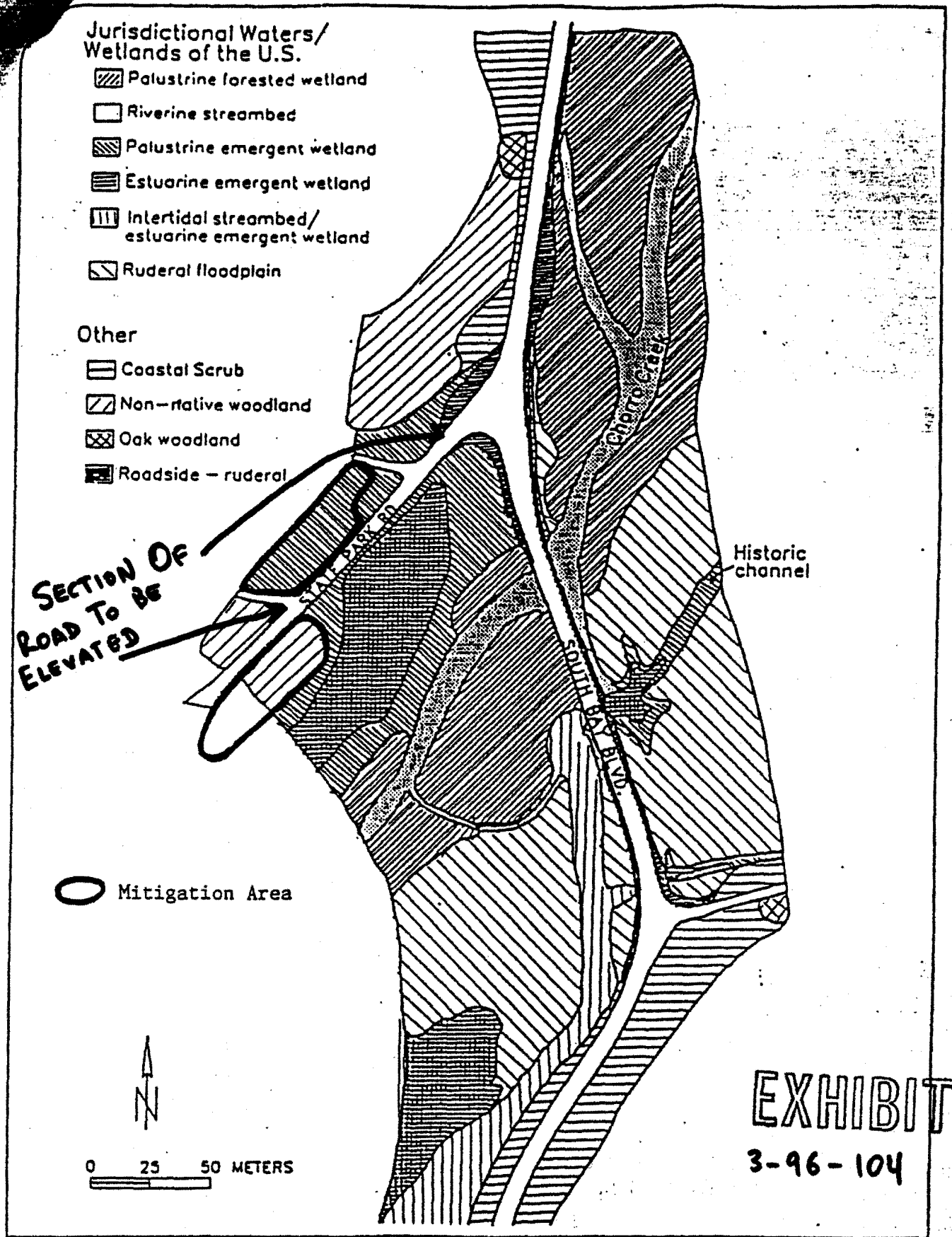
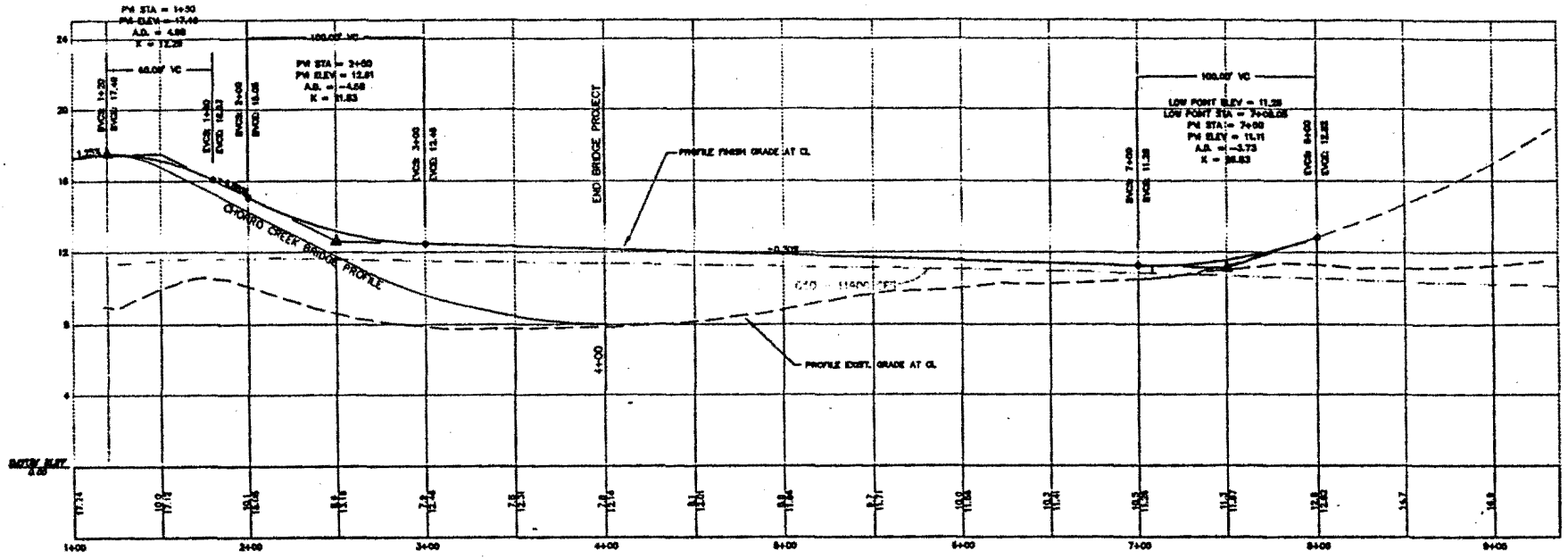


Figure 3

HABITATS IN THE TWIN BRIDGES PROJECT AREA

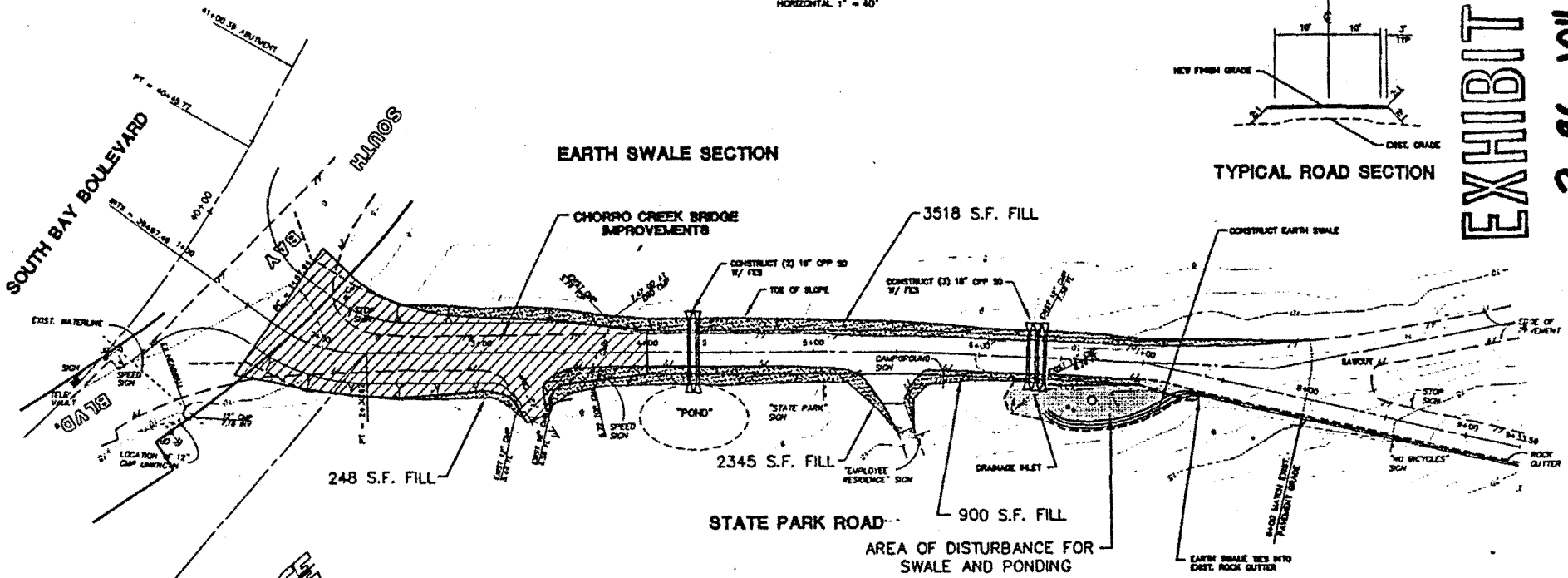


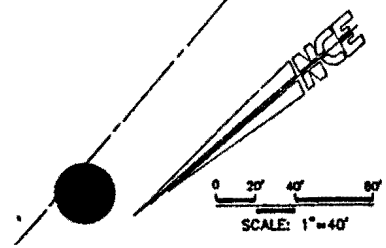
PROFILE
VERTICAL 1" = 4'
HORIZONTAL 1" = 40'

EXHIBIT 3
3-96-104

TYPICAL ROAD SECTION

EARTH SWALE SECTION





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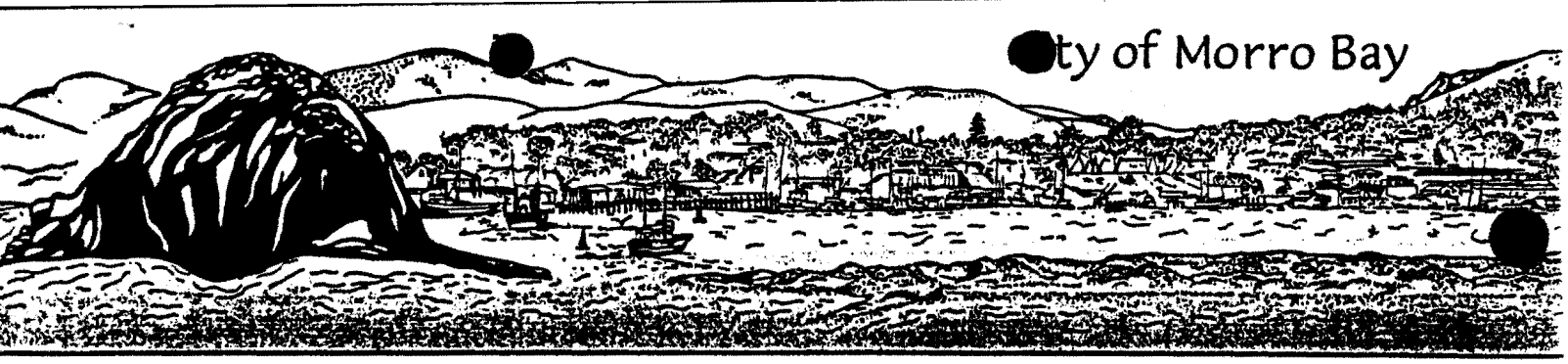
REGISTERED PROFESSIONAL ENGINEER
STEVEN J. SYLVESTER
79743
Exp. 3/31/99

NO.	BY	DATE



PLANNING & BUILDING DEPARTMENT • 595 HARBOR STREET, MORRO BAY, CALIFORNIA 93442 • 805-772-6210

October 11, 1996

Steve Guiney, Coastal Program Analyst
California Coastal Commission
725 Front Street, Ste. 300
Santa Cruz, CA 95060

SUBJECT: Morro Bay State Park Road Improvements

Dear Steve:

As we discussed over the telephone last month, the Department of Parks and Recreation (DPR)is proposing to elevate a portion of State Park Road to coincide with the improvements to South Bay Boulevard and the new Chorro Creek Bridge. DPR will be preparing an expanded initial study and negative declaration for the project as described in the attached letters dated July 30, 1996 and August 8, 1996.

A portion of the project will require a Coastal Development Permit (CDP) from the State due to impacts that will occur with the area of original jurisdiction. To assist DPR in a more timely permit review process, the City will relinquish permit authority for this project to the State so that a single CDP may be processed.

Please call me if you have any questions of need any additional information.

Sincerely,

SHAUNA NAUMAN,
Interim Director

Encl.

cc: Vincent G. Cicero, State Park Resource Ecologist
Bill Boucher, Morro Bay Public Work Director

EXHIBIT 4
3-96-104