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Hearing Date: 8/13/15

STAFF REPORT: REGULAR CALENDAR

Application No.: 1-14-1680

Applicants: Scott & Kasey Hockett

Agent: Stephanie Webb Consulting

Location: 32440 N Harbor Drive (APN 018-140-55).

Project Description: Perform structural repairs to an existing retaining wall including replacing 88 feet of wood framing and 11 piles.

Staff Recommendation: Approval with conditions.

SUMMARY OF STAFF RECOMMENDATION

The applicants are proposing to repair a segment of the bulkhead/retaining wall that extends along their riverfront property on the north side of Noyo Harbor at 32440 North Harbor Drive, Mendocino County. This segment of bulkhead/retaining wall was damaged by the recent tsunami in March 2011 and is currently failing. The repair involves the in-kind replacement of 88 feet of retaining wall and 11 associated supporting piles within Noyo River, resulting in approximately 446 square feet of replacement fill. The repaired bulkhead/retaining wall segment would be the same width (5 feet) and in the same location as the existing wall, and would encroach no further into the river.

The proposed work constitutes a repair and maintenance project pursuant to Section 30610(d) of the Coastal Act and Section 13252 of the Commission's regulations because the project will not involve an addition, enlargement or expansion of the bulkhead/retaining wall and less than 50% of the structure will be replaced. In its consideration of a repair and maintenance project, the Commission reviews whether the proposed method of repair or maintenance of the existing development is consistent with the Chapter 3 policies of the Coastal Act.

The applicant proposes to use a vibratory hammer to replace damaged 12-inch-diameter timber piles with new 10-inch diameter steel piles, and to replace the existing wooden frame and facing of the segment of bulkhead/retaining wall with new arsenic-free pressure-treated wooden materials. Without all feasible mitigation measures, the proposed method of repair and maintenance could have potential adverse effects on the environment of the Noyo River estuary, including (1) loss of intertidal mudflat habitat; (2) construction-related impacts to the biological productivity and quality of coastal waters; and (3) impacts on water quality from the use of treated wood. To address potential adverse effects, staff recommends that the Commission attach [Special Conditions 1-5](#), requiring: (a) future maintenance, (b) restrictions on the timing of construction, (c) adherence to construction-related responsibilities, (d) limitations related to pile extraction and installation, and (e) limitations related to the use of pressure-treated wood in the marine environment.

Staff believes that the proposed method of repair and maintenance, as conditioned, is consistent with all applicable Chapter 3 policies of the Coastal Act. The motion to adopt the staff recommendation of **approval** of Coastal Development Permit (CDP) 1-14-0773 with special conditions is found on [page 4](#).

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APPENDICES

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EXHIBITS

[Exhibit 1](#) – Regional Location Map

[Exhibit 2](#) – Vicinity Maps

[Exhibit 3](#) – Parcel Map

[Exhibit 4](#) – Aerial View

[Exhibit 5](#) – Site Photographs

[Exhibit 6](#) – Project Plans

[Exhibit 7](#) – Historic Photographs

I. MOTION AND RESOLUTION

The staff recommends that the Commission adopt the following resolution:

Motion:

I move that the Commission approve coastal development permit 1-14-1680 pursuant to the staff recommendation.

Staff recommends a **YES** vote on the foregoing motion. Passage of this motion will result in approval of the permit as conditioned and adoption of the following resolution and findings. The motion passes only by affirmative vote of a majority of the Commissioners present.

Resolution:

The Commission hereby approves a coastal development permit for the proposed development and adopts the findings set forth below on grounds that the development as conditioned will be in conformity with the policies of Chapter 3 of the Coastal Act. Approval of the permit complies with the California Environmental Quality Act because either 1) feasible mitigation measures and/or alternatives have been incorporated to substantially lessen any significant adverse effects of the development on the environment, or 2) there are no further feasible mitigation measures or alternatives that would substantially lessen any significant adverse impacts of the development on the environment.

II. STANDARD CONDITIONS

This permit is granted subject to the following 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 permittee 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 on which the Commission voted on the application. 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. **Interpretation:** Any questions of intent of interpretation of any condition will be resolved by the Executive Director or the Commission.
4. **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.

5. **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

This permit is granted subject to the following special conditions:

1. Timing of Construction.

- A. Construction activities authorized by this permit that occur within or adjacent to tidal wetlands and waters shall be conducted during the period of June 15 through October 15, or for such additional time that the Executive Director may permit for good cause and in consultation with all relevant resource protection agencies, to minimize conflicts with commercial and recreational fisheries and to protect sensitive fish species;
- B. Construction activities authorized by this permit that occur within or adjacent to tidal wetlands and waters shall be conducted during periods of low tides only and heavy equipment shall only be operated from upland areas to minimize the generation of suspended sediment and potential water quality impacts; and
- C. Construction activities shall occur during periods of dry weather only.

2. Construction Responsibilities. The permittee shall comply with the following construction-related requirements:

- A. No work shall occur in areas containing eelgrass (*Zostera marina*) without a Commission amendment to this coastal development permit unless the Executive Director determines no amendment is legally required;
- B. Silt curtains or similar erosion and sediment control devices shall be installed around the area under construction to intercept sediment before it enters coastal waters. Erosion and sediment control devices shall be removed once construction is complete;
- C. All materials removed from the bulkhead/retaining wall and debris generated during the project shall not be allowed to rest on the river substrate. During construction, all trash shall be properly contained, removed from the work site, and disposed of on a regular basis to avoid contamination of habitat. No construction materials, debris, or waste of any kind shall be placed or stored where it may be subject to entering coastal waters or wetlands. Staging shall occur on an asphalt deck away from the river. In the staging area, materials shall be covered with tarps and surrounded by wattles to contain runoff, sediment, and leachate from reaching the water;
- D. Debris, waste, and other excess material generated by the authorized work shall be lawfully disposed of outside of the coastal zone at an authorized disposal site capable of receiving such materials within 10 days of project completion. Side casting or placing any construction debris, soils, or any other debris or waste within any wetland or environmentally sensitive habitat area is prohibited;

- E. To minimize wildlife entanglement and plastic debris pollution, the use of temporary rolled erosion and sediment control products with plastic netting (such as polypropylene, nylon, polyethylene, polyester, or other synthetic fibers used in fiber rolls, erosion control blankets, and mulch control netting) is prohibited. Any erosion-control associated netting shall be made of natural fibers and constructed in a loose-weave design with movable joints between the horizontal and vertical twines;
- F. To prevent the release of materials that may be toxic to fish and other aquatic species, poured concrete shall be isolated from stream flow and concrete paving and grinding, curing, and waste management best management practices shall be employed;
- G. Fuels, lubricants, and solvents shall not be allowed to enter coastal waters or wetlands. Hazardous materials management equipment including oil containment booms and absorbent pads shall be available immediately on-hand at the project site. Any accidental spill shall be rapidly contained and cleaned up; and
- H. Any fueling, maintenance, and washing of construction equipment shall occur in confined areas specifically designed to control runoff and located more than 100 feet away from Noyo River.

3. Pile Installation and Extraction. The permittee shall comply with the following requirements related to the removal and replacement of piles:

- A. Piles shall be installed and extracted with a vibratory hammer. Pile-driving with an impact hammer is prohibited;
- B. The permittee shall remove timber piles proposed for removal in their entirety. Piles that cannot be removed in their entirety shall be cut off at least one foot below the level of the mudline; and
- C. Replacement piles shall be installed in the footprints of the old piles or as close to the original pile locations as possible.

4. Pressure-Treated Wood in the Marine Environment. The permittee shall comply with the following requirements related to the removal of wood piles and other debris and the use of pressure-treated wood in the marine environment:

- A. Any pressure-treated wood added to the bulkhead/retaining wall shall contain arsenic-free wood preservatives such as ACQ (Alkaline Copper Quarternary);
- B. Whenever possible, cutting or drilling of treated wood shall occur at least 100 feet away from coastal waters and wetlands, and any sawdust, drill shavings, and wood scraps shall be contained and collected in order to prevent the discharge of treated wood into the marine environment;
- C. Treated wood materials shall be stored during construction in a contained, covered area to minimize exposure to precipitation, pursuant to [Special Condition 2\(C\)](#) above;
- D. Existing wooden piles and framing to be removed shall be removed and disposed of at a landfill authorized to accept such chemically treated waste;

- E. Pressure-treated wood added to the bulkhead/retaining wall shall meet the American Wood Protection Association's (AWPA) wood preservative standards; and
- F. Pressure-treated wood added to the bulkhead/retaining wall shall be treated to the proper preservative retention standard (i.e., amount of preservative) specified by the AWPA for the appropriate AWPA Use Category. The pressure-treated wood added to the bulkhead/retaining wall shall not have a preservative retention exceeding the minimum specified for the appropriate Use Category, in order to minimize the amount of preservative present in treated wood on-site that may subsequently leach into the marine environment.

5. Conformance to Plans and Future Maintenance.

- A. The repairs to the bulkhead/retaining wall shall be performed consistent with the project plans prepared by Mitch Nelson Construction dated February 3, 2014 (**Exhibit 6**), and the footprint of bulkhead/retaining wall shall not be extended out further into the riverbed than the footprint of the existing bulkhead/retaining wall;
- B. To protect the integrity of the bulkhead/retaining wall over time, the permittee shall maintain the bulkhead/retaining wall in its approved state; and
- C. Any proposed changes to the plan or additional maintenance shall be reported to the Executive Director. No changes to the plan or additional maintenance shall occur without a Commission approved amendment to this coastal development permit unless the Executive Director determines that no amendment is legally required.

6. Assumption of Risk, Waiver of Liability and Indemnity. By acceptance of this permit, the applicant acknowledges and agrees: (i) that the site may be subject to hazards from waves, tidal inundation, and other hazards; (ii) to assume the risks to the applicant and the property that is the subject of this permit of injury and damage from such hazards in connection with this permitted development; (iii) to unconditionally waive any claim of damage or liability against the Commission, its officers, agents, and employees for injury or damage from such hazards; and (iv) to indemnify and hold harmless the Commission, its officers, agents, and employees with respect to the Commission's approval of the project against any and all liability, claims, demands, damages, costs (including costs and fees incurred in defense of such claims), expenses, and amounts paid in settlement arising from any injury or damage due to such hazards.

7. County of Mendocino Encroachment Permit. PRIOR TO COMMENCEMENT OF CONSTRUCTION, the permittee shall provide to the Executive Director a copy of an encroachment permit issued by the County of Mendocino or evidence that no encroachment permit or other County permission is required. The permittee shall inform the Executive Director of any changes to the project required by the County. Such changes shall not be incorporated into the project until the permittee obtains a Commission amendment to this coastal development permit, unless the Executive Director determines that no amendment is legally required.

8. **North Coast Regional Water Quality Control Board Approval. PRIOR TO COMMENCEMENT OF CONSTRUCTION**, the permittee shall provide to the Executive Director a copy of a permit issued by the Regional Board, a letter of permission, or evidence that no permit or permission is required. The applicant shall inform the Executive Director of any changes to the project required by the Regional Board. Such changes shall not be incorporated into the project until the applicant obtains a Commission amendment to this coastal development permit, unless the Executive Director determines that no amendment is legally required.

9. **Army Corps of Engineers Approval. PRIOR TO COMMENCEMENT OF CONSTRUCTION**, the permittee shall provide to the Executive Director a copy of a permit issued by the U.S. Army Corps of Engineers, a letter of permission, or evidence that no permit or permission is required. The applicant shall inform the Executive Director of any changes to the project required by the U.S. Army Corps of Engineers. Such changes shall not be incorporated into the project until the applicant obtains a Commission amendment to this coastal development permit, unless the Executive Director determines that no amendment is legally required.

10. **National Marine Fisheries Service Approval. PRIOR TO COMMENCEMENT OF CONSTRUCTION**, the permittee shall provide to the Executive Director a copy of a letter of concurrence issued by the National Marine Fisheries Service, or evidence that no letter of concurrence is required. The applicant shall inform the Executive Director of any changes to the project required by the National Marine Fisheries Service. Such changes shall not be incorporated into the project until the applicant obtains a Commission amendment to this coastal development permit, unless the Executive Director determines that no amendment is legally required.

IV. FINDINGS AND DECLARATIONS

The Commission hereby finds and declares as follows:

A. PROJECT DESCRIPTION

The applicants, Scott and Kasey Hockett of the Noyo Fish Company, are proposing to repair a segment of the bulkhead/retaining wall along their riverfront property on the north side of Noyo Harbor at 32440 North Harbor Drive, Mendocino County (APN 018-140-55).

The proposed method of repair of the bulkhead/retaining wall would involve the replacement of 88 feet of a retaining wall and 11 associated piles that protect a row of parking on the eastern edge of their property (See **Exhibit 6** for project plans). This segment of bulkhead/retaining wall was damaged by the recent tsunami in March 2011 and is currently failing with broken and missing piles and concrete and earthen material slumping into the river (See **Exhibit 5** for photographs of the damaged structure). According to the project description, the existing 12-inch-diameter, wooden piles would be removed and new 10-inch diameter steel piles would be installed in their place with a vibratory hammer. In addition, the existing wood frame and facing of the retaining

wall would be removed and replaced with new pressure-treated wooden materials. Finally, approximately 20 cubic yards of concrete and drain rock fill would be added behind the retaining wall. The repaired five-foot-wide bulkhead/retaining wall segment would not encroach any further into the river.

To avoid impacts to coastal waters and marine resources, all work would be performed from land and work would only occur during periods of low tide. Staging would occur in an approximately 500-square-foot area adjacent to the project footprint on an asphalt deck on the applicant's private property. Tarps, wattles, and sand bags would be used to cover and contain materials in the staging area. Piles to be extracted would be encircled with silt fencing, and extracted piles and all other debris resulting from construction activities would be removed from the harbor and disposed of at an approved landfill. New wood framing to be installed would be treated with arsenic-free Alkaline Copper Quaternary (ACQ) preservatives.

B. PROJECT BACKGROUND & SETTING

The Noyo Harbor is a commercial and recreational fishing boat harbor located in an unincorporated area at the southern end of the City of Fort Bragg near the mouth of the Noyo River (**Exhibits 1 & 2**). Properties in Noyo Harbor have a zoning and land use classification of Fishing Village to ensure that the limited available space on the flats at Noyo is reserved for industries that must be on or near the water.

North Harbor Drive connects Highway One, traversing the 110-foot high bluffs above the Noyo Harbor entrance, down to the north river flat within the lower Noyo Harbor area. The Noyo Fish Company property is the first riverfront property along North Harbor Drive after the road descends from the bluffs above. The subject property is used by the applicants for their business, the Noyo Fish Company. The Noyo Fish Company purchases fish from several local hook and line fisherman who target crab, salmon, rockfish, lingcod, and blackcod, and processes fish for direct sales at an on-site fish market. The company also owns their own fishing boat and permits and shares their dock with commercial charter boats.

The subject property consists of, from east to west, a row of parking, an outdoor café seating area, a building for fish processing and sales, and a concrete boat launching ramp. The property is connected by a 25-foot-wide fixed pier structure and a separate gangway to a row of floats out in the river that run parallel to the shoreline. The section of bulkhead/retaining wall to be replaced is part of a continuous bulkhead/retaining wall that begins at the east end of the parking area and extends under the Noyo Fish Company building, ending in the concrete boat launching ramp (See **Exhibit 4** for an aerial view of the armored shoreline).

The section of bulkhead/retaining wall to be replaced protects the row of private parking on the eastern end of the property. This segment of the bulkhead/retaining wall was damaged in March 2011 by a tsunami that struck the California coast, generated by the 9.0-magnitude Tohoku Earthquake off the coast of Japan. High winds and tsunami waves caused enough damage for a local emergency to be declared in Mendocino County under the California Disaster Assistance Act. The Board of Supervisors of Mendocino County, in its request for the declaration in Resolution No. 11-033, indicated that when the tsunami struck the Mendocino County coastline,

four feet of water drained out of the Noyo Harbor before water surged back into the harbor with destructive force, causing the area to suffer substantial damage.

The entire subject property has been previously disturbed and developed, and it contains no wetlands or environmentally sensitive habitat other than the adjacent Noyo River estuary. The Noyo River estuary supports important commercial and recreational fisheries and is designated critical habitat for Chinook Salmon (*Onchorynchus tshawytscha*), coho salmon (*Onchorynchus kisutch*), and steelhead (*Oncorhynchus mykiss*). The Noyo River estuary also contains native eelgrass (*Zostera marina*); however, no eelgrass beds exist in the project vicinity.

C. STANDARD OF REVIEW

The proposed project is located on the northern banks of the Noyo River estuary in Mendocino County, in areas shown on the State Lands Commission over which the state retains a public trust interest. Therefore, the site is within the Commission's area of retained jurisdiction, and the standard of review that the Commission must apply to the development is the Chapter 3 policies of the Coastal Act.

D. OTHER AGENCY APPROVALS

County of Mendocino

Approximately half of the 88-foot of bulkhead/retaining wall to be replaced is located on the County's right-of-way which intersects the Hockett's riverfront property between APNs 018-140-54 and 018-140-55 (See **Exhibit 3**). The County therefore must issue an encroachment permit for the project. [Special Condition 7](#) is attached to require that the applicant obtain the County encroachment permit and any other necessary local approvals for the project prior to commencement of construction.

Noyo Harbor District

The Noyo Harbor District is a designated port district that receives its authority from the Harbors and Navigation Code of the State of California. The District is governed by an appointed five-person Commission that is charged to organize, fund, build, administer, and maintain the Noyo Harbor and has the authority to pass and enforce ordinances to meet those ends. The tide and submerged lands within and along the Noyo River were granted to the Harbor District in 1961 by the state legislature. The District, as administrator of the tidelands and submerged lands in the project area, has previously granted the applicants a tidelands encroachment lease for their dock, floats, and launch ramp. The District does not have a formal permit requirement for repair and maintenance projects.

North Coast Regional Water Quality Control Board

The Regional Board requires a water quality certification (WQC) for projects involving dredging and/or filling activities under Section 401 of the Clean Water Act. To ensure that the project ultimately approved by the Regional Board is the same as the project authorized herein, the Commission attaches [Special Condition 8](#), which requires the permittee to submit to the Executive Director evidence of the Regional Board's approval of the project prior to the commencement of construction activities. The condition requires that any project changes

resulting from the Regional Board's approval not be incorporated into the project until the permittee obtains any necessary amendments to this coastal development permit.

California Department of Fish and Wildlife (CDFW)

CDFW issued a Streambed Alteration Agreement (SAA) for the proposed work pursuant to Section 1603 of the California Fish and Game Code (SAA No. 1600-2014-0246-R1) on January 8, 2015.

U.S. Army Corps of Engineers

The Army Corps has regulatory authority over the proposed project under Section 10 of the Rivers and Harbors Act of 1899 (33 U.S.C. 1344) which regulates the diking, filling, and placement of structures in navigable waterways, and Section 404 of the Clean Water Act which regulates the discharge of dredged or fill material in waters of the United States. To ensure that the project ultimately approved by the Army Corps is the same as the project authorized herein, the Commission attaches [Special Condition 9](#), which requires the permittee to submit to the Executive Director evidence of the Army Corps' approval of the project prior to the commencement of construction activities. The condition requires that any project changes resulting from the Army Corps' approval not be incorporated into the project until the permittee obtains any necessary amendments to this coastal development permit.

National Marine Fisheries Service

Pursuant to Section 7(a) of the Endangered Species Act of 1973, as amended (U.S.C. Sec 1531 et seq.), the Army Corps initiated consultation with the National Marine Fisheries Service (NMFS) requesting their concurrence that the proposed project is not likely to adversely affect listed species. Based on informal email correspondence between Coastal Commission and NMFS staff, the project is not likely to adversely affect species listed as threatened or endangered or their critical habitat under the Endangered Species Act. The Commission attaches [Special Condition 10](#), which requires the permittee to submit to the Executive Director NMFS' concurrence letter prior to the commencement of construction activities. The condition requires that any project changes resulting from NMFS' consultation not be incorporated into the project until the permittee obtains any necessary amendments to this coastal development permit.

E. PERMIT AUTHORITY FOR REPAIR & MAINTENANCE DEVELOPMENT

Section 30610 of the Coastal Act provides, in relevant part (emphasis added):

Notwithstanding any other provision of this division, no coastal development permit shall be required pursuant to this chapter for the following types of development and in the following areas: . . .

(d) Repair or maintenance activities that do not result in an addition to, or enlargement or expansion of, the object of those repair or maintenance activities; provided, however, that if the commission determines that certain extraordinary methods of repair and maintenance involve a risk of substantial adverse environmental impact, it shall, by regulation, require that a permit be obtained pursuant to this chapter.

Section 13252 of the Commission administrative regulations (14 CCR 13000 *et seq.*) provides, in relevant part (emphasis added):

(a) *For purposes of Public Resources Code section 30610(d), the following extraordinary methods of repair and maintenance shall require a coastal development permit because they involve a risk of substantial adverse environmental impact:*

... ..

(3) *Any repair or maintenance to facilities or structures or work located in an environmentally sensitive habitat area, any sand area, within 50 feet of the edge of a coastal bluff or environmentally sensitive habitat area, or within 20 feet of coastal waters or streams that include:*

(A) *The placement or removal, whether temporary or permanent, of rip-rap, rocks, sand or other beach materials or any other forms of solid materials;*

(B) *The presence, whether temporary or permanent, of mechanized equipment or construction materials.*

All repair and maintenance activities governed by the above provisions shall be subject to the permit regulations promulgated pursuant to the Coastal Act, including but not limited to the regulations governing administrative and emergency permits. The provisions of this section shall not be applicable to methods of repair and maintenance undertaken by the ports listed in Public Resources Code section 30700 unless so provided elsewhere in these regulations. The provisions of this section shall not be applicable to those activities specifically described in the document entitled Repair, Maintenance and Utility Hookups, adopted by the Commission on September 5, 1978 unless a proposed activity will have a risk of substantial adverse impact on public access, environmentally sensitive habitat area, wetlands, or public views to the ocean.

(b) *Unless destroyed by natural disaster, the replacement of 50 percent or more of a single family residence, seawall, revetment, bluff retaining wall, breakwater, groin or any other structure is not repair and maintenance under section 30610(d) but instead constitutes a replacement structure requiring a coastal development permit.*

The proposed project qualifies as a repair and maintenance project under Section 30601(d) of the Coastal Act and Section 13252(b) of the Commission's regulations because; (a) the project does not involve an addition to or enlargement or expansion of the subject bulkhead/retaining wall, which was originally constructed in 1954 (See **Exhibit 7** for historic photographs of the project area), and (b) does not involve replacement of 50% or more of the entire bulkhead/retaining wall. The 88-foot-long segment to be repaired is less than 50% of the entire approximately 180-foot-long bulkhead/retaining wall which begins at the east end of the parking area and extends under the Noyo Fish Company building, ending in the boat launch ramp (See **Exhibit 4** for an aerial view of the armored shoreline).

Although certain types of repair projects are exempt from CDP requirements, Section 13252 of the regulations requires a coastal development permit for extraordinary methods of repair and maintenance enumerated in the regulation. The proposed repair work involves the presence of construction materials and placement and removal of solid materials within 20 feet of coastal waters. The proposed repair project therefore requires a coastal development permit under CCR Section 13252(a)(3) of the Commission regulations.

In considering a permit application for a repair or maintenance project pursuant to the above-cited authority, the Commission reviews whether the proposed method of repair or maintenance is consistent with the Chapter 3 policies of the Coastal Act. The Commission's evaluation of such repair and maintenance projects does not extend to an evaluation of the conformity with the Coastal Act of the existing development.

The applicant proposes to repair the existing shoreline bulkhead/retaining wall in part by replacing piles, wood framing, and wood facing. If not properly undertaken with appropriate mitigation, the necessary maintenance activities could have adverse impacts on coastal resources, including threatened salmonids and other fish, mudflat habitat, and water quality. While the applicant has proposed some mitigation measures to protect coastal resources, more specific measures are needed to further minimize the project's expected and potential impacts on wetlands, marine habitats, and water quality. The conditions required to ensure that these measures are part of the project are discussed in the following findings relevant to fill in coastal waters and protection of marine resources. Therefore, as conditioned in these findings, the Commission finds that the proposed method of repair and maintenance development is consistent with all applicable Chapter 3 policies of the Coastal Act.

F. FILL IN COASTAL WATERS & PROTECTION OF MARINE RESOURCES

Section 30230 of the Coastal Act states, in applicable part, as follows:

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 as follows:

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.

Section 30233 of the Coastal Act states, in applicable part, as follows:

(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...

Coastal Act Section 30108.2 defines “fill” as “*earth or any other substance or material, including pilings placed for the purposes of erecting structures thereon, placed in a submerged area.*” The proposed repair and maintenance project involves the in-kind replacement of 88 feet of retaining wall and 11 piles within Noyo River, resulting in approximately 446 square feet of replacement fill. The Commission must consider whether authorizing this proposed method of repair and maintenance is consistent with Coastal Act policies addressing the protection of the marine environment, including applicable provisions of Sections 30230, 32031, and 30233 of the Coastal Act.

The applicable provisions of Sections 30230, 30231, and 30233 of the Coastal Act cited above require that the method of proposed repair and maintenance: (1) use the least environmentally damaging feasible alternative; (2) provide feasible mitigation measures to minimize adverse environmental effects; and (3) protect the biological productivity and the quality of coastal wetlands and waters.

Least Environmentally Damaging Feasible Alternative

As previously discussed, the Commission must ensure that the method of repair and maintenance be the least environmentally damaging feasible alternative consistent with Section 30233 of the Coastal Act. Coastal Act Section 30108 defines “feasible” as “*...capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social and technological factors.*” In this case, alternatives that have been identified include: (1) the “no project” alternative; (2) alternative material types; and (3) alternative pile installation methods.

a. No project alternative

The primary purpose of the proposed project is to replace a failing segment of the subject property’s bulkhead/retaining wall. Under the “no project” alternative, the bulkhead/retaining wall would continue to deteriorate, with more of the existing asphalt, concrete, timbers, and piles eroding into the riverbed. Once released into the river, this debris could impair water quality, damage property, and obstruct boating operations. In addition, the failing bulkhead/retaining wall would increasingly compromise the structural integrity of the row of private parking it protects, posing a hazard to customers of the Noyo Fish Company and others who use the parking area. Without maintenance, both the wall and parking would eventually be lost to erosion, and the adjacent North Harbor Drive would become susceptible, threatening the primary public access to the Noyo Fish Company and other priority coastal-dependent, coastal-related, and visitor-serving uses on the north Noyo flat. Thus the no project alternative is not a less environmentally damaging feasible alternative to the proposed project as conditioned.

b. Alternative material types

The applicants propose to replace the 11 timber piles that currently support the damaged section of the bulkhead/retaining wall with the same number of steel piles. Steel piles are relatively inert in the marine environment and thus the use of steel piles will help reduce the water quality impacts of leaching wood preservatives.

The applicants are proposing to replace the relatively long segment of wooden facing of the bulkhead/retaining wall with pressure treated wood, as it is not feasible to replace this segment of the wall with steel materials. To reduce the impacts of leaching of toxic chemicals from these new wooden materials, the applicants propose to use arsenic free pressure treated wood. As discussed below in “[Feasible Mitigation Measures](#)”, the Commission attaches [Special Condition 4](#) to further reduce the potential for water quality impacts from leaching wood preservative chemicals. The use of other kinds of material as wall facing, such as concrete or rock, would expand the width of the bulkhead/retaining wall and cause the wall to encroach into and adversely affect the adjoining mudflat habitat. Therefore the use of alternative material types is not a less environmentally damaging feasible alternative to the proposed project as conditioned.

c. Alternative pile installation methods

The applicant proposes to remove 11 existing piles and install 11 new piles with a vibratory hammer rather than a traditional impact hammer. The use of the less powerful vibratory hammer is feasible in this case because the piles do not have to be driven into the bedrock below the mudflat. The piles need only be driven into the mud substrate to reach the point of resistance. Pile driving with an impact hammer generates hydroacoustic pressure impulses and particle velocities that can cause effects on fish ranging from altered behavior, hearing loss, and tissue injuries to immediate mortality. In contrast, vibratory hammers produce peak sound levels that are substantially lower than those produced by impact hammers and as such are a less environmentally damaging alternative than impact pile driving.¹ The applicant also proposes to perform pile replacement work during low tides when the riverbed under the piles is dry to further reduce underwater acoustic effects on fish and other marine organisms. Therefore, utilizing alternate pile installation methods such as driving piles with an impact hammer is not a less environmentally damaging feasible alternative to the proposed project as conditioned.

Feasible Mitigation Measures

The Commission must ensure that the method of repair and maintenance minimizes adverse environmental wetland effects consistent with Section 30233 and protects the biological productivity and the quality of coastal wetlands consistent with the requirements of Sections 30230 and 30231. The proposed method of repair and maintenance could have a number of potential adverse effects on the environment of the Noyo River estuary, including (1) loss of intertidal mudflat habitat; (2) construction-related impacts to the biological productivity and quality of coastal waters; and (3) impacts on water quality from the use of treated wood. The potential impacts and their mitigations are discussed in the following sections:

¹ California Department of Transportation, 2009, p. 2-26.

a. Loss of intertidal mudflat habitat

As discussed above, the proposed repair work involves approximately 446 square feet of replacement fill from the in-kind replacement of a retaining wall and piles in mudflat habitat. Mudflats in the area support a variety of worms, mollusks, and other benthic organisms which are important prey for many fish and birds in the Noyo River estuary. To minimize impacts to the tidally influenced riverbed, the applicant proposes to perform all work from shore and to install the replacement bulkhead/retaining wall within the footprint of the existing structure. In addition, the applicant proposes to replace the existing 12-inch diameter piles with 10-inch diameter piles, resulting in a net decrease of approximately 2.6 square feet of fill. To ensure impacts are minimized, the Commission attaches: (1) [Special Condition 3\(A\)](#) requiring that replacement piles are installed in the footprints of old piles or as close to the original pile locations as possible; and (2) [Special Condition 5\(A\)](#) requiring that the repaired bulkhead/retaining wall not encroach further out into the riverbed than the existing bulkhead/retaining wall. In addition, the Commission attaches [Special Condition 3\(B\)](#) to ensure that all existing piles that cannot be removed in their entirety are cut off one-foot below the mudline. Cutting off the piles at least one foot below the mudline will allow the area of the removed piles to silt over and provide habitat for benthic organisms above the broken piles. Thus, as the bulkhead/retaining wall and piles will be replaced in-kind and temporary impacts from construction workers and equipment within the muddy intertidal riverbed will be avoided, the proposed method of repair and maintenance, as conditioned, will result in no permanent net loss of mudflat and will minimize adverse environmental effects on mudflat habitat.

b. Construction-related impacts to the biological productivity and quality of coastal waters

The project as proposed involves the removal and placement of materials and the use of heavy equipment in and around the riverbed that could result in sediments, debris, or hazardous materials entering the river channel and impacting sensitive fish species and their habitat, including the water quality of the Noyo River estuary.

To minimize the generation of suspended sediment and resultant water quality impacts, the applicant proposes to perform all construction activities during periods of dry weather and to only conduct construction activities that occur within or adjacent to tidal wetlands and waters during periods of low tide. The Commission attaches these limitations on construction timing as [Special Condition 1\(B\)](#) and [1\(C\)](#). To further prevent erosion into Noyo River during construction, the applicant proposes to install silt curtains around the area under construction to intercept sediment before it enters coastal waters. The applicant also proposes to stage construction materials and temporarily stockpile construction debris, including the extracted piles and the other elements of the bulkhead/retaining wall to be removed onshore in a temporary staging area surrounded by wattles and covered with tarps. All construction debris will be hauled to an authorized landfill for disposal upon project completion. To ensure that the applicant implements these proposed best management practices (BMPs), the Commission attaches the measures as [Special Condition 2\(B\)-\(D\)](#). In addition, to minimize the potential for wildlife entanglement and plastic debris pollution from the proposed use of silt fences and wattles, the Commission attaches [Special Condition 2\(E\)](#) prohibiting the use of temporary rolled erosion and sediment control products with plastic netting. The condition instead requires that any

erosion-control associated netting be made of natural fibers and constructed in a loose-weave design to reduce the potential for small animal entrapment and avoid leaving a residue of plastic in the environment upon degradation of the material.

The proposed project includes the use of heavy equipment and the pouring of concrete as backfill material behind the portion of the bulkhead/retaining wall to be repaired. To prevent the exposure of river water to curing concrete that may be toxic to fish and other aquatic species, the Commission imposes [Special Condition 2\(F\)](#) requiring that poured concrete be isolated from stream flow and concrete paving and grinding, curing, and waste management best management practices be employed. To ensure that adverse water quality impacts associated with hazardous material spills are minimized, [Special Condition 2\(G\)](#) requires that (1) fuels, lubricants, and solvents shall not be allowed to enter coastal waters or wetlands; (2) hazardous materials management equipment shall be available immediately on-hand at the project site; and (3) any accidental spill shall be rapidly contained and cleaned up. Additionally, [Special Condition 2\(H\)](#) requires that any fueling, maintenance, and washing of construction equipment shall occur more than 100 feet away from the mean high tide line.

The waters of the Noyo River estuary provide habitat for a number of commercially significant and environmentally sensitive fish species that could be impacted by disturbed sediments and increased noise and vibration during construction. To avoid these impacts, [Special Condition 1\(A\)](#) limits construction activities that occur within or adjacent to tidal wetlands and waters to the period of June 15th to October 15th of each year, when sensitive anadromous fish species are least likely to be present in the area (i.e. before the majority of the upstream adult spawning migrations and after the downstream migration of smolts have occurred). In addition, to minimize the hydroacoustic effects of pile installation and removal on any fish or other marine organisms that are present in the river during the construction window, [Special Condition 3\(A\)](#) prohibits the use of an impact hammer for pile replacement.

The Noyo River also contains native eelgrass which is essential to the health and productivity of the river as it provides many ecological benefits, including stabilization of bottom sediments, a substrate for epiphytic algae and invertebrates, foraging areas and shelter for young fish and invertebrates, food for migratory waterfowl, and spawning surfaces for invertebrates and fish. According to the applicant, no eelgrass or eelgrass habitat exists in the vicinity of the project site. To ensure eelgrass is avoided, [Special Condition 2\(A\)](#) requires that no work shall occur in areas containing eelgrass without a Commission amendment to this coastal development permit unless the Executive Director determines no amendment is legally required.

The Commission thus finds that the proposed method of repair and maintenance, as conditioned, provides feasible mitigation measures to minimize potential adverse environmental impacts of construction on the biological productivity and quality of coastal waters.

c. Impacts on water quality from the use of pressure-treated wood

The applicant proposes to remove pressure-treated wood piles, framing, and facing and install 88 feet of new pressure-treated wood facing. Chemicals in the wood preservative such as copper and arsenic could potentially leach out of these bulkhead/retaining wall components and into the water column where they could be absorbed by fish and other aquatic organisms with adverse consequences. To avoid releases of potentially toxic wood preservative chemicals into coastal waters, the applicant proposes to use Alkaline Copper Quaternary treated wood for the new wall facing which is an arsenic-free pressure-treated wood. To minimize water quality impacts from the removal of old treated piles, framing, and facing and the treatment, storage, and use of new pressure-treated wood, the Commission attaches [Special Condition 4](#), which requires (a) the use of only arsenic-free wood preservatives (b) the cutting and drilling of treated wood only at locations that are a minimum of 100 feet away from the water whenever possible; (c) the storage of all treated wood materials in a contained, covered area; (d) the disposal of existing wood piles and framing only at landfills authorized to accept such chemically treated waste; (e) adherence to the American Wood Protection Association's (AWPA) wood preservative standards; and (f) treatment of wood to the proper preservative retention standard (i.e., amount of preservative) specified by the AWPA for the appropriate AWPA Use Category. Given that (1) the project as conditioned will result in the permanent removal of 11 pressure-treated wood piles, 2) new pressure-treated wood framing will be arsenic-free, and (3) best management practices will be utilized in selecting, treating, storing, cutting, drilling, and disposing of pressure-treated wood, the use of pressure-treated wood will not have a significant adverse impact on the water quality of the Noyo River estuary. The Commission thus finds that the proposed method of repair and maintenance, as conditioned, provides feasible mitigation measures to minimize potential adverse environmental impacts of pressure-treated wood on the biological productivity and quality of coastal waters.

Conclusion

In conclusion, the Commission finds that the method of proposed repair and maintenance as conditioned herein (1) uses the least environmentally damaging feasible alternative; (2) provides feasible mitigation measures to minimize adverse environmental effects; and (3) protects the biological productivity and the quality of coastal wetlands and waters, consistent with Sections 30230, 30231, and 30233 of the Coastal Act.

G. HAZARDS

Section 30253 of the Coastal Act states in applicable part:

New development shall do all of the following:

- (1) Minimize risks to life and property in areas of high geologic, flood, and fire hazard.*
- (2) Assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and*

cliffs...

The existing failing bulkhead/retaining wall is located in an area of high hazard from waves and tidal action, and the proposed repair and maintenance project is necessary to address previous damage from these hazards. The replacement bulkhead/retaining wall has been engineered to ensure its geologic stability and integrity in this high-energy environment. The use of steel piles rather than wooden piles will improve the longevity of the structure, and the steel piles will be driven half their length into the river bottom to provide stability to the bulkhead/retaining wall. In addition, the bulkhead/retaining wall's wood frame will begin one foot below riverbed grade to avoid the potential for base sliding. Finally, the proposed drain rock fill to be added behind the wood frame will reduce the buildup of hydrostatic pressure behind the wall. To ensure that the repairs conform to these construction plans, the Commission attaches [Special Condition 5](#). This condition requires that the repairs to the bulkhead/retaining wall be performed consistent with the submitted plans, and that the bulkhead/retaining wall be maintained in its approved state. The condition also requires that no changes to the approved plan or additional maintenance shall occur without a Commission approved amendment to this coastal development permit unless the Executive Director determines that no amendment is legally required.

Due to the uncertain nature and inherent risk associated with the construction of improvements in high energy coastal environments, the Commission attaches [Special Condition 6](#). Special Condition 6 requires the applicant to assume the risks of extraordinary erosion and flood hazards along the river bank and waive any claim of liability on the part of the Commission. Given that the applicant has chosen to implement the project despite these risks, the applicant must assume the risks. In this way, the applicant is notified that the Commission is not liable for damage as a result of approving the permit for the development. The condition also requires the applicant to indemnify the Commission in the event that third parties bring an action against the Commission as a result of the failure of the development to withstand hazards.

The Commission finds that as conditioned, the repair and maintenance project will minimize risks to life and property from geologic and flood hazards, will assure stability and structural integrity, and will neither create nor contribute significantly to geologic instability or erosion of the site or surrounding area consistent with the requirements of Section 30253 of the Coastal Act.

H. PUBLIC ACCESS

Section 30210 of the Coastal Act requires that maximum public access shall be provided consistent with public safety needs and the need to protect natural resource areas from overuse. Section 30212 of the Coastal Act requires that access from the nearest public roadway to the shoreline be provided in new development projects, except where it is inconsistent with public safety, military security, or protection of fragile coastal resources, or where adequate access exists nearby. Section 30211 of the Coastal Act requires that development not interfere with the public's right to access gained by use or legislative authorization. Section 30214 of the Coastal Act provides that the public access policies of the Coastal Act shall be implemented in a manner that takes into account the capacity of the site and the fragility of natural resources in the area. In applying Sections 30210, 30211, 30212, and 30214, the Commission is also limited by the need to show that any denial of a permit application based on these sections or any decision to grant a

permit subject to special conditions requiring public access is necessary to avoid or offset a project's adverse impact on existing or potential access.

As stated above, the proposed development involves the repair and maintenance of a pre-Coastal Act bulkhead/retaining wall along the Noyo River, an arm of the sea. The repairs will not displace any existing public access facilities, as the project will simply repair a bulkhead/retaining wall that protects a row of private parking from erosion. In addition, the project will not increase demand for public access facilities, as it will involve no expansion of use, will not increase population density in the area, and will not otherwise draw more people to the waterfront. Therefore, the Commission does not find it necessary to require that public access be provided as a result of the proposed project.

Construction to repair the bulkhead/retaining wall will require the temporary closure of the adjoining private parking. This parking is used by customers of Noyo Fish Company, a business that catches, purchases, processes, and sells local fish. Noyo Fish Company also shares the parking spaces with charter boat businesses. The applicant indicates that the parking will only need to be closed approximately ten days to accommodate the repairs. Temporary fencing and signage will be used to communicate the closure to the public and limit access during construction. Construction will not block or interfere with public access on North Harbor Drive, the adjacent public right of way that provides access to the north river flat. Therefore, as the closure of the existing parking will be of relatively short duration and will not block access to the harbor, the Commission finds that the temporary adverse impacts of construction on public access are not significant.

Additionally, the repairs will not only prevent a row of private parking from continuing to be undermined by erosion, but will also protect the adjoining North Harbor Drive. North Harbor Drive connects Highway One, which traverses the 110-foot high bluffs above the Noyo Harbor entrance, down to the north river flat within the lower Noyo Harbor area. The Hockett property is the first riverfront property that North Harbor Drive passes after it descends from the bluffs above. Failure of the bulkhead/retaining wall and erosion of the private parking will eventually result in damage to the adjoining right of way, severing access to Noyo Beach Park, located near the mouth of the river just west of the Highway One Bridge over the river. Severing North Harbor Drive adjacent to the subject property would also block access to the Noyo Fish Company and other coastal-dependent and visitor-serving uses on the north river flat, including a number charter boating operations, fish processing plants, and various other marine-related retail/commercial businesses. Therefore, the proposed repair and maintenance project will help protect the public's continued use and enjoyment of existing shoreline public access and recreational boating facilities.

The proposed project involves the removal of numerous piles from the river. If the piles are only partially removed, or broken off during removal and left in the water, they could pose a safety and navigation hazard to boaters and other harbor users. Therefore, to avoid adverse impact to public access and recreation on the river from hazardous piles, the Commission attaches [Special Condition 3\(B\)](#) to ensure that all piles that cannot be removed in their entirety are cut off one-foot below the mudline.

The Commission thus finds that the proposed method of repair and maintenance, as conditioned, will not have any significant adverse effects on public access, and is consistent with the requirements of Coastal Act Sections 30210, 30211, 30212, and 30214.

I. CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)

California Department of Fish and Wildlife (CDFW) served as the lead agency for the project for CEQA purposes. CDFW filed a notice of exemption for the project on January 7, 2015 pursuant to Section 15302, Class 2 of the CEQA Guidelines which exempts replacement or reconstruction of existing structure involving negligible or no expansion of capacity. Section 13906 of the Commission's administrative regulation requires Coastal Commission approval of CDP applications to be supported by a finding showing the application, as modified by any conditions of approval, is consistent with any applicable requirements of the California Environmental Quality Act (CEQA). Section 21080.5(d)(2)(A) of CEQA prohibits a proposed development from being approved if there are any feasible alternatives or feasible mitigation measures available, which would substantially lessen any significant adverse effect the proposed development may have on the environment.

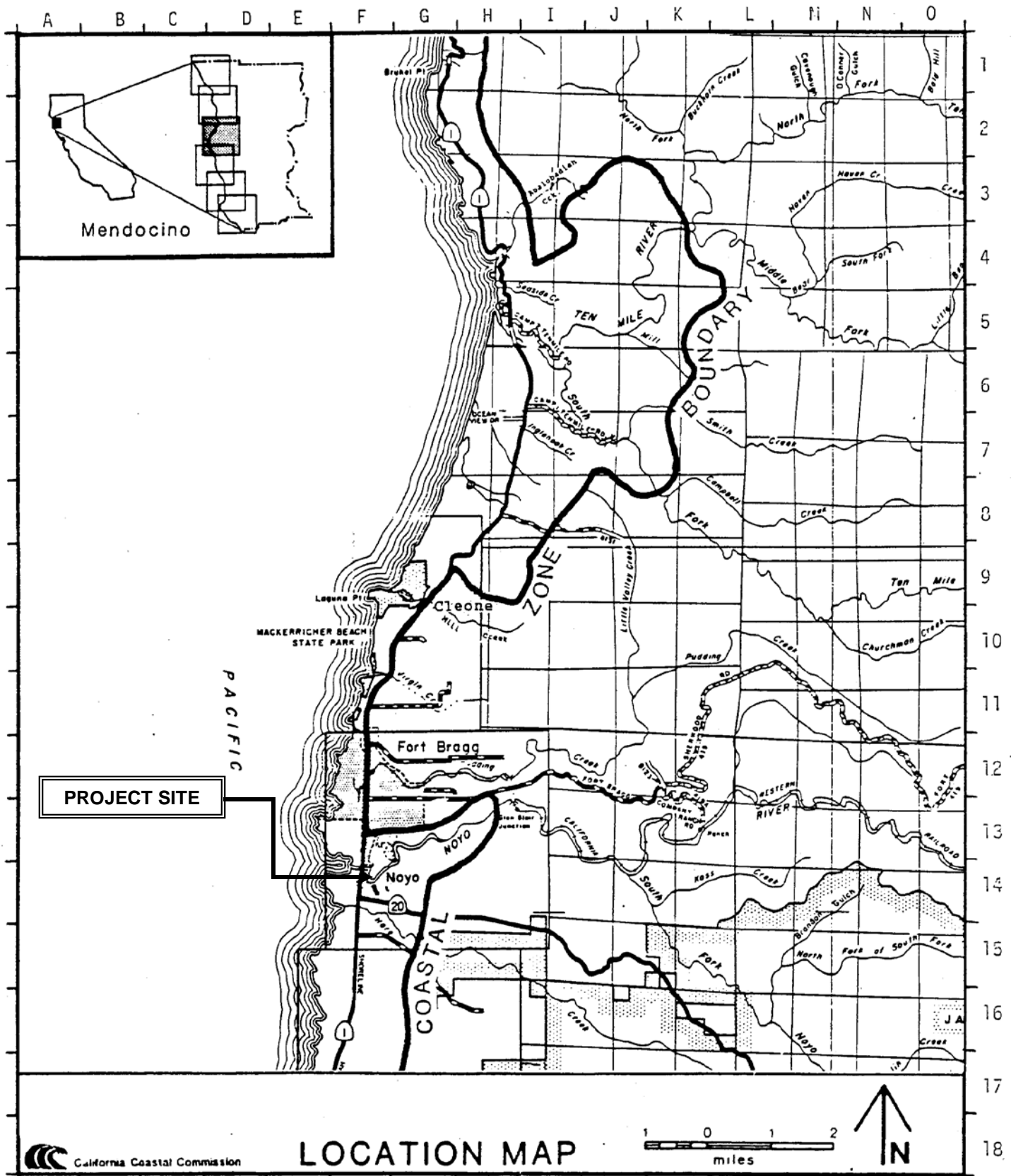
The Coastal Commission's review and analysis of CDP applications has been certified by the Secretary of Resources as being the functional equivalent of environmental review under CEQA. As a responsible agency, the Commission conducted its analysis of the potential impacts of the proposed development that the Commission is authorized by the Coastal Act to review. The Commission has reviewed the relevant coastal resource issues associated with the proposed project and has identified appropriate and necessary conditions to assure protection of coastal resources consistent with the requirements of the Coastal Act. The staff report discusses the relevant coastal resource issues with the proposed development. All public comments received to date have been addressed in the staff report, including staff's oral presentation and the findings adopted by the Commission. The Commission incorporates its findings on Coastal Act consistency at this point as if set forth in full. As conditioned, there are no additional feasible alternatives or feasible mitigation measures available, beyond those required, which would substantially lessen any significant adverse environmental effect that approval of the proposed project, as modified, would have on the environment. Therefore, the Commission finds that the proposed repair and maintenance project can be found to be consistent with the Coastal Act and CEQA Section 21080.5(d)(2)(A).

APPENDIX A
SUBSTANTIVE FILE DOCUMENTS

Application File for Coastal Development Permit No. 1-14-1680.

California Department of Transportation. (2009, February). Technical guidance for assessment and mitigation of the hydroacoustic effects of pile driving on fish. Sacramento, CA: ICF Jones & Stokes, Illinworth & Rodkin.

National Marine Fisheries Service. (2014, October). California Eelgrass Mitigation Policy and Implementing Guidelines.



County of Mendocino

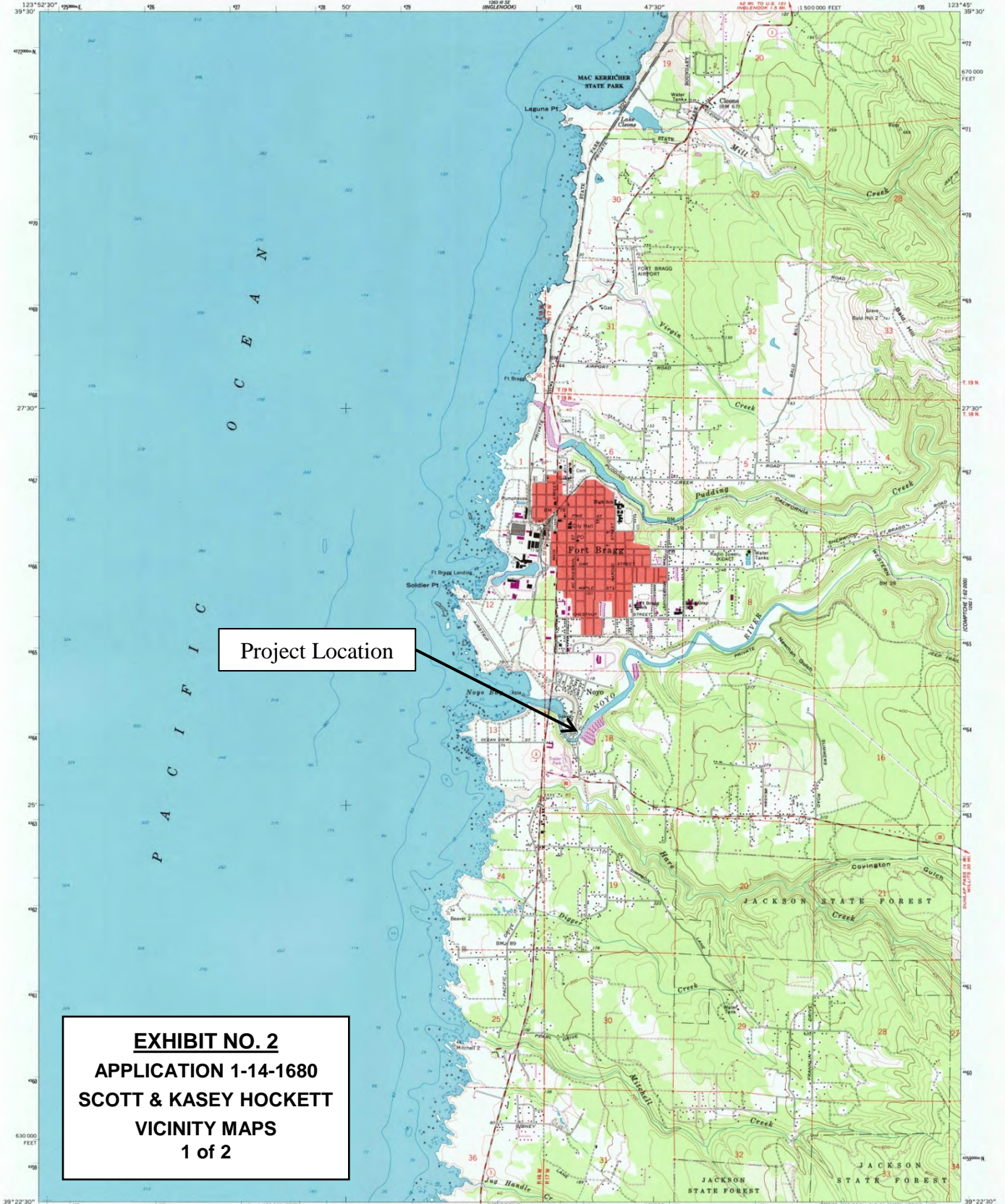
EXHIBIT NO. 1
 APPLICATION 1-14-1680
 SCOTT & KASEY HOCKETT
 REGIONAL LOCATION MAP



U.S. DEPARTMENT OF THE INTERIOR
U.S. GEOLOGICAL SURVEY

STATE OF CALIFORNIA
DEPARTMENT OF WATER RESOURCES

FORT BRAGG QUADRANGLE
CALIFORNIA-MENDOCINO CO.
7.5 MINUTE SERIES (TOPOGRAPHIC)
NE 4 FORT BRAGG 10' QUADRANGLE

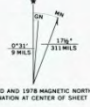


Project Location

EXHIBIT NO. 2
APPLICATION 1-14-1680
SCOTT & KASEY HOCKETT
VICINITY MAPS
1 of 2

Mapped, edited, and published by the Geological Survey
Control by USGS, NOS/NOAA, and USCE

Topography from aerial photographs by photogrammetric methods
Aerial photographs taken 1957. Field check 1960
Selected hydrographic data compiled from NOS/NOAA Chart 5703 (1957)
This information is not intended for navigational purposes
Polyconic projection. 1927 North American datum
15,000-foot grid based on California coordinate system, zone 2
1,000-meter Universal Transverse Mercator grid ticks,
zone 10, shown in blue
To place on the predicted North American Datum 1983
move the projection lines 18 meters north and
86 meters east as shown by dashed corner ticks
Red tint indicates area in which only landmark buildings are shown
There may be private inholdings within the boundaries of the
National or State reservations shown on this map.



SCALE 1:24,000

CONTOUR INTERVAL 40 FEET
DOTTED LINES REPRESENT 20-FOOT CONTOURS
NATIONAL GEODETIC VERTICAL DATUM OF 1929
DEPTH CURVES AND SOUNDINGS IN FEET—DATUM IS MEAN LOWER LOW WATER
SHOULDER SHOWN REPRESENTS THE APPROXIMATE LINE OF MEAN HIGH WATER
THE MEAN RANGE OF TIDE IS APPROXIMATELY 4 FEET

THIS MAP COMPLIES WITH NATIONAL MAP ACCURACY STANDARDS
FOR SALE BY U.S. GEOLOGICAL SURVEY, P.O. BOX 25286, DENVER, COLORADO 80225
A FOLDER DESCRIBING TOPOGRAPHIC MAPS AND SYMBOLS IS AVAILABLE ON REQUEST



QUADRANGLE LOCATION

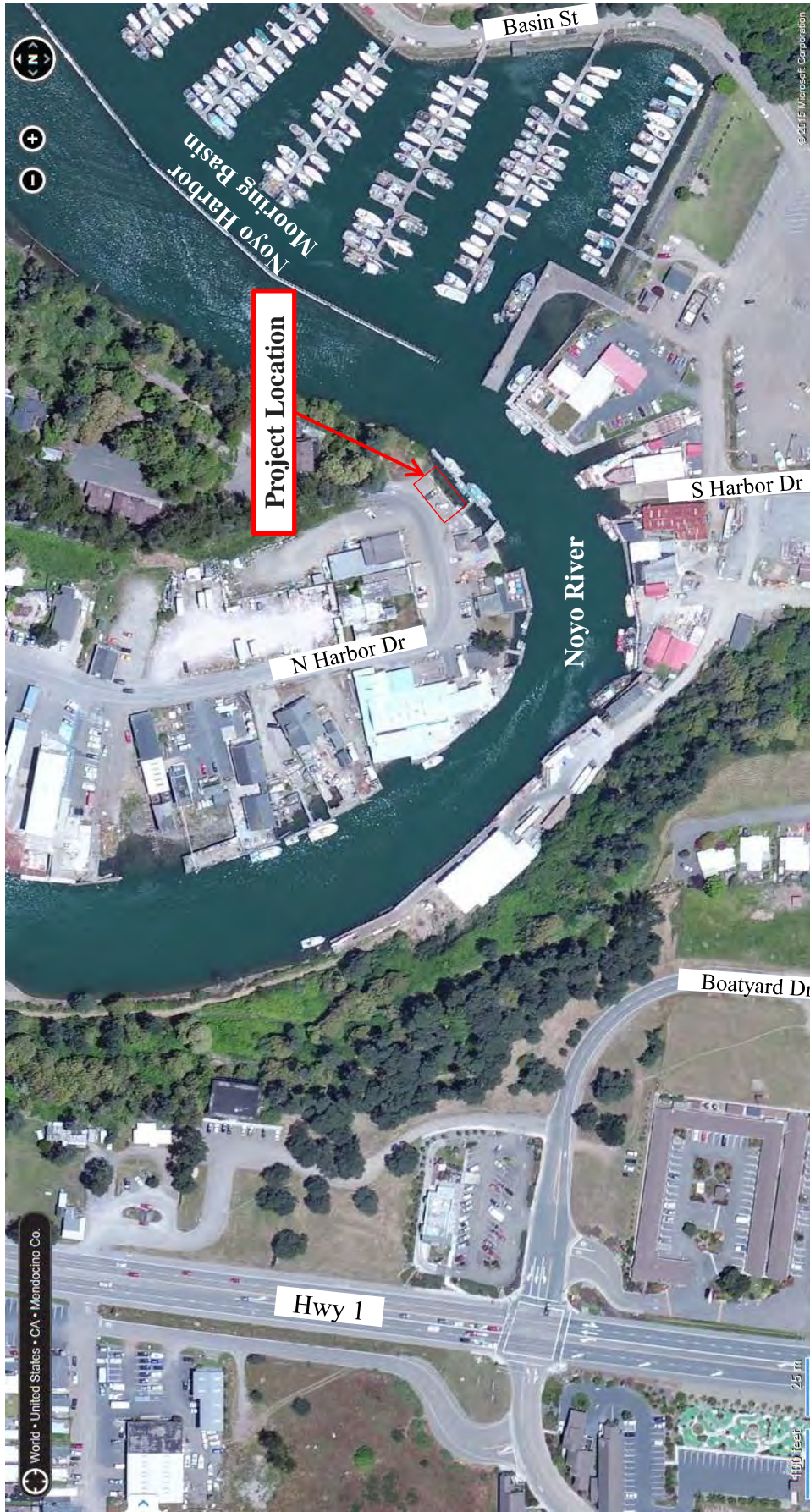
ROAD CLASSIFICATION
Medium-duty Light-duty
Unimproved dirt
State Route

FORT BRAGG, CALIF.
NE 4 FORT BRAGG 10' QUADRANGLE
39123-07-1F-004

1960
PHOTOREVISED 1978
DMA LINE IV NE-SERIES 1985

Revisions shown in purple compiled from aerial photographs
taken 1976. This information not field checked.
Map edited 1978

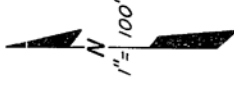




Bing Maps

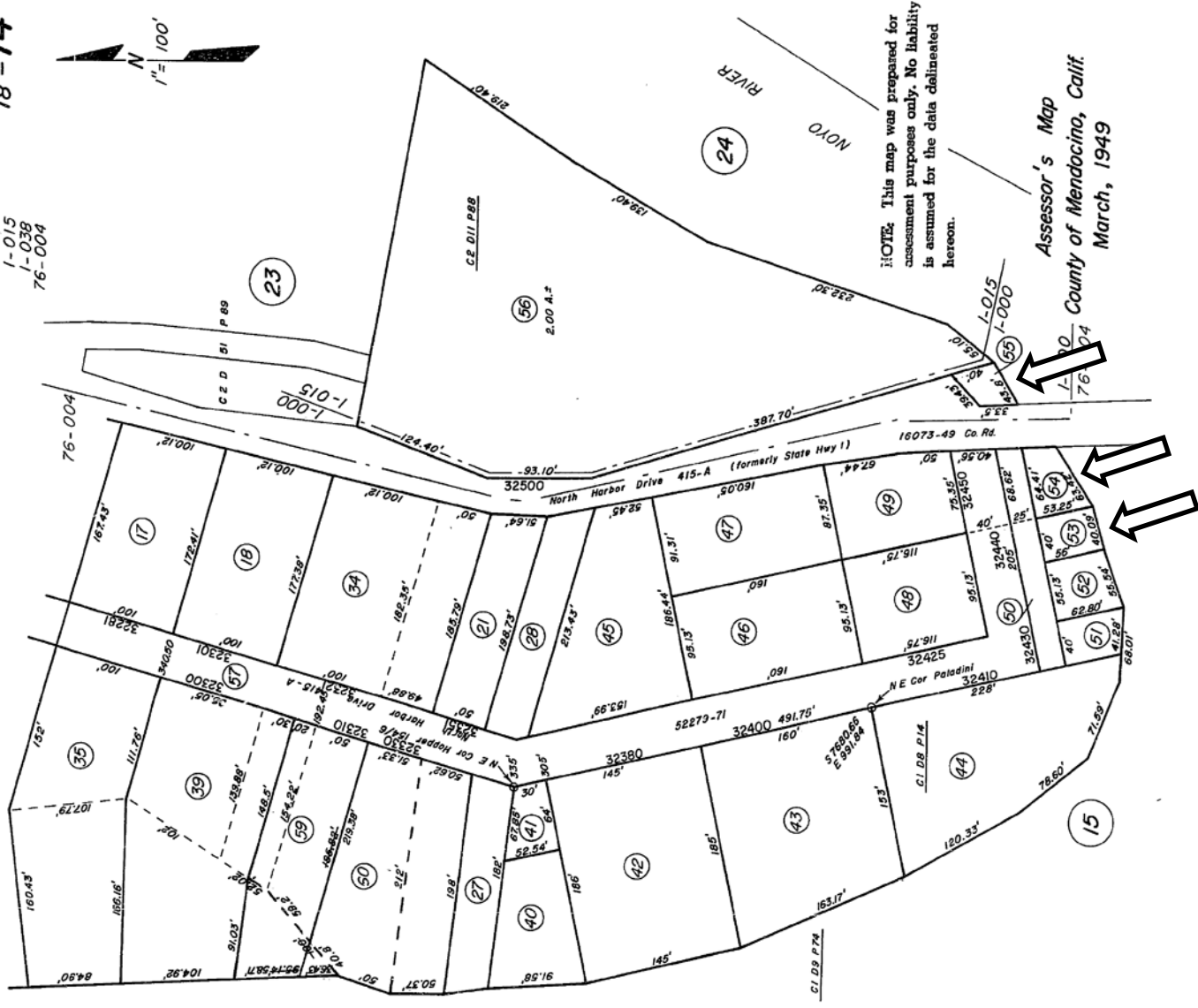
18-14

1-000
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1-039
76-004



Por. Sec. 18 T.18N. R.17W. M.D.B.&M.

13



NOTE: This map was prepared for assessment purposes only. No liability is assumed for the data delineated hereon.

Assessor's Map
County of Mendocino, Calif.
March, 1949

EXHIBIT NO. 3
APPLICATION 1-14-1680
SCOTT & KASEY HOCKETT
PARCEL MAP

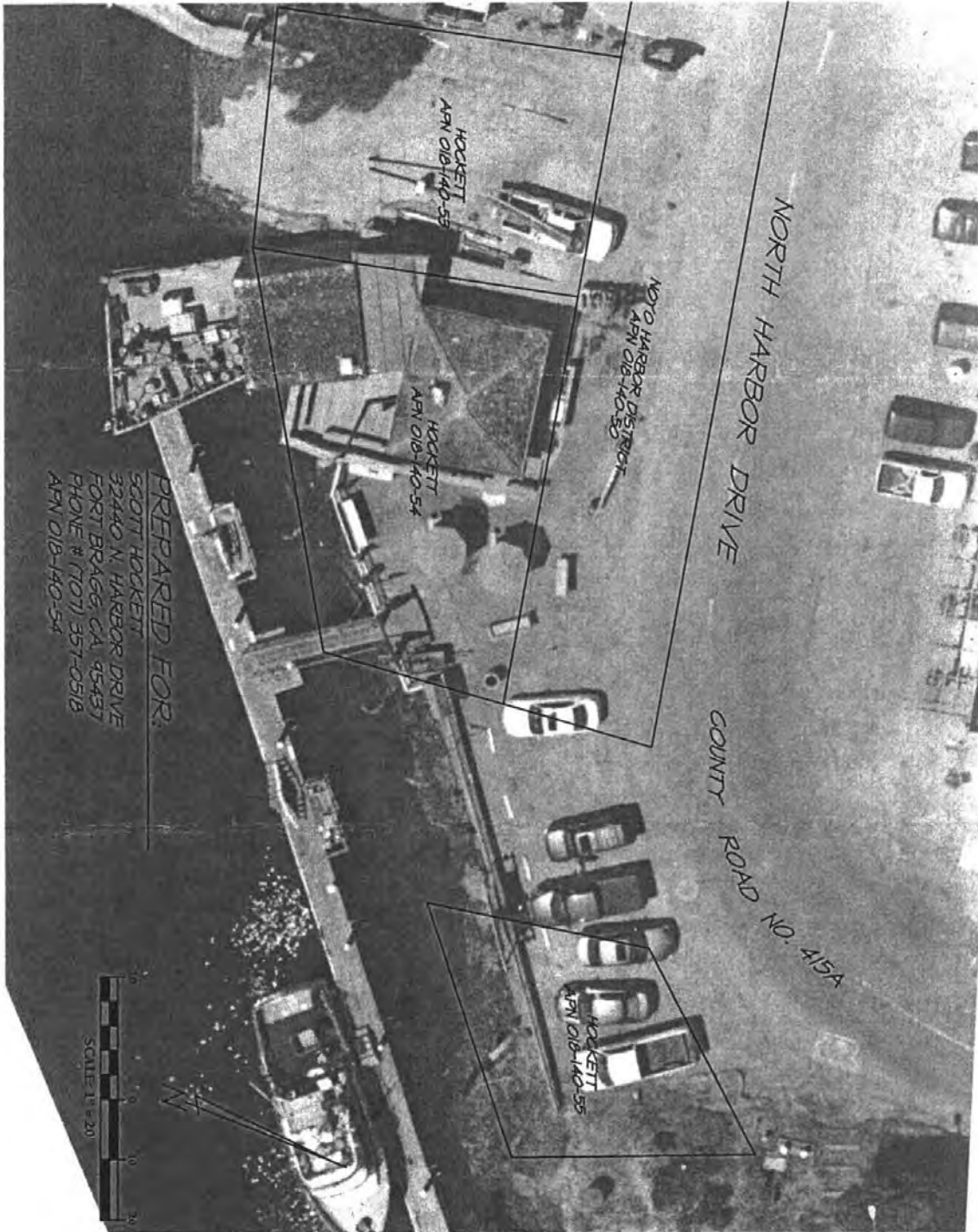
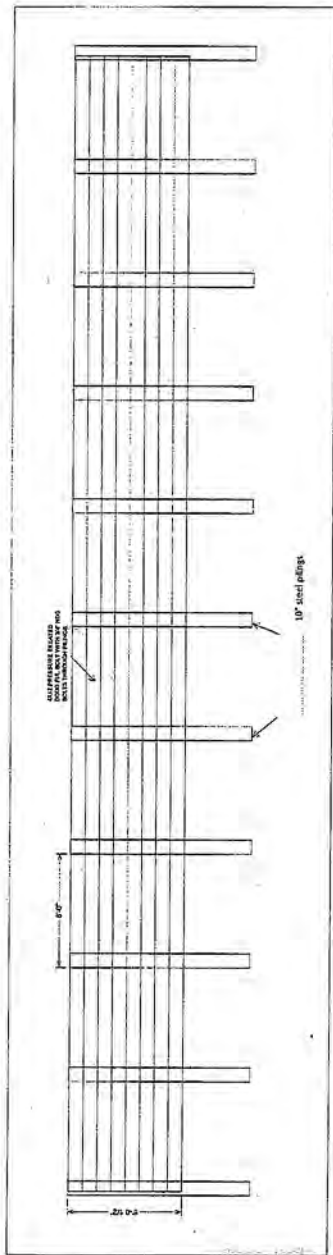


EXHIBIT NO. 4
APPLICATION 1-14-1680
SCOTT & KASEY HOCKETT
AERIAL VIEW



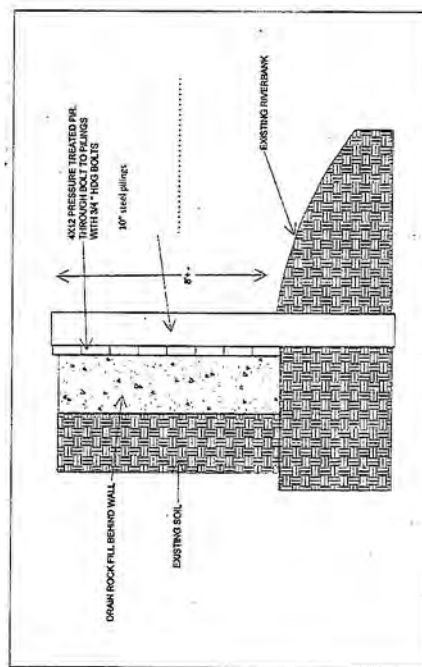
EXHIBIT NO. 5
APPLICATION 1-14-1680
SCOTT & KASEY HOCKETT
SITE PHOTOGRAPHS



RETAINING WALL ELEVATION

SCALE 1/4"=1'

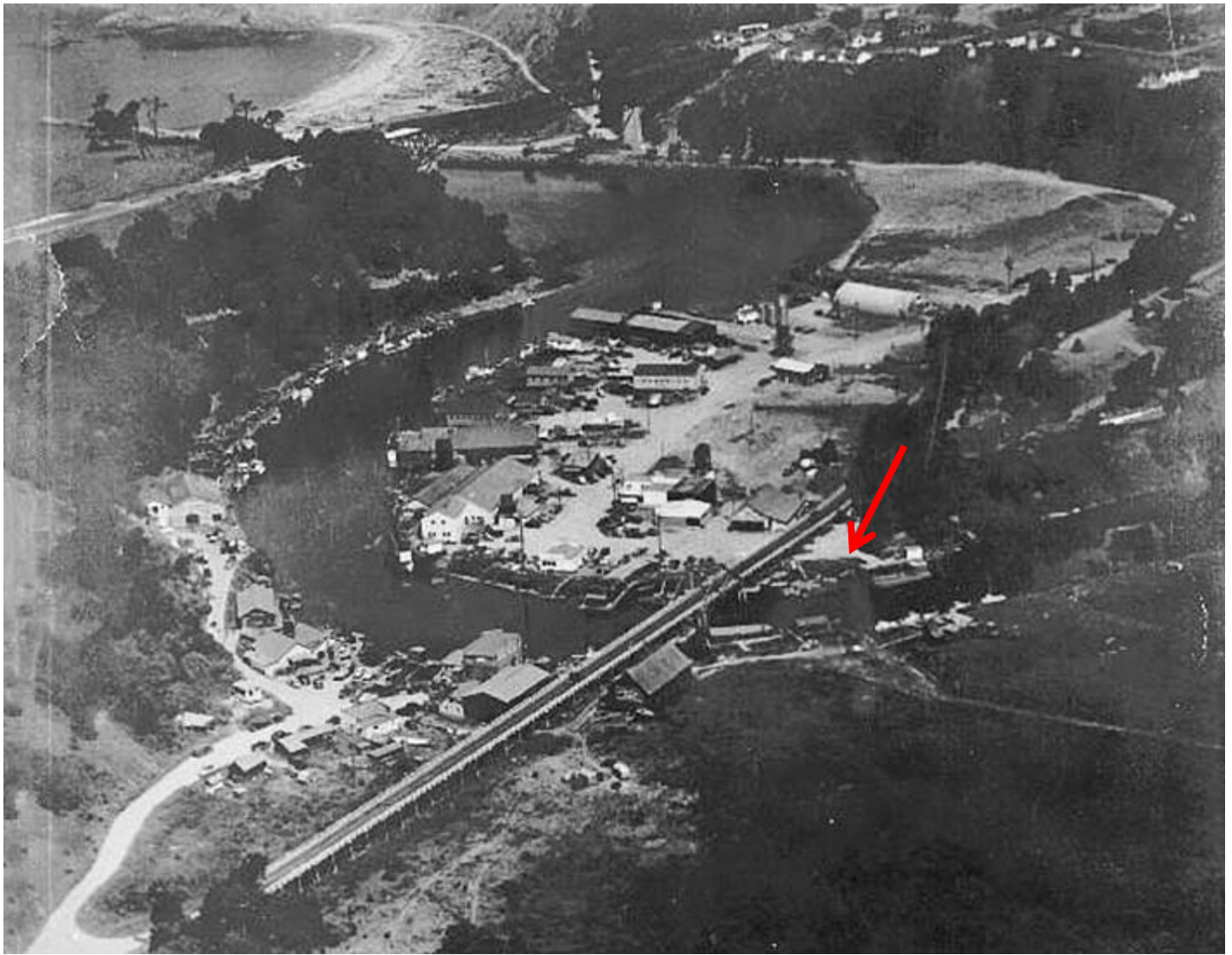
Text



CROSS SECTION

SCALE 1/2"=1'

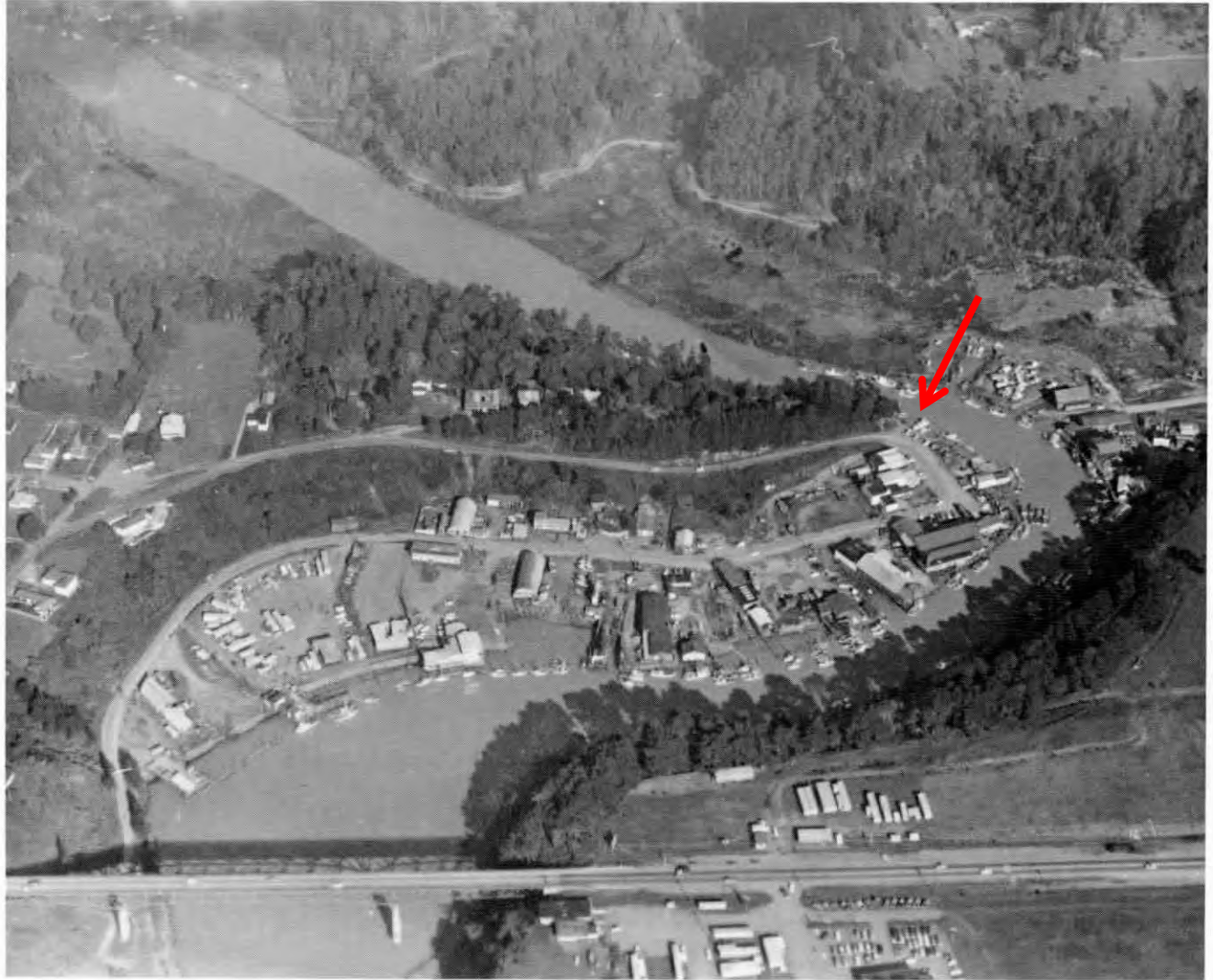
EXHIBIT NO. 6
APPLICATION 1-14-1680
SCOTT & KASEY HOCKETT
PROJECT PLANS



1947 Aerial View of Noyo Basin

(http://www.mendorailhistory.org/1_towns/towns/noyo.htm)

EXHIBIT NO. 7
APPLICATION 1-14-1680
SCOTT & KASEY HOCKETT
HISTORIC PHOTOGRAPHS
1 of 2



Herbert James collection

1965 Aerial View of Noyo Basin

(Stebbins, Beth. *The Noyo*. Mendocino: Bear and Stebbins, 1986.,
Pg. 94.)