CALIFORNIA COASTAL COMMISSION
SOUTH CENTRAL COAST AREA
89 SOUTH CALIFORNIA ST., SUITE 200
VENTURA, CA 93001
(805) 585-1800

W24b

ADDENDUM

DATE: September 3, 2015

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TO: Commissioners and Interested Parties

FROM: South Central Coast District Staff

SUBJECT: Agenda Item 24b, Wednesday, September 9, 2015
Pepperdine University Notice of Impending Development PEP-NOID-0004-15 (Los Angeles County)

The purpose of this addendum is to make corrections and revisions to the staff report.

Staff hereby makes the following revisions to the findings and special conditions of the report are made as follows (language to be inserted is shown **bold underlined** and language to be deleted is shown in ~~**bold line out**~~):

1. ***In order to correct an inadvertent error in Special Condition 1 in the first paragraph, the following revision is made:***

   The University agrees to comply with the recommendations contained in all of the geology, geotechnical, and/or soils reports for the development. These recommendations, including recommendations concerning grading, and construction, shall be incorporated into all final design and construction plans, which must be reviewed and approved by the consultant prior to commencement of development. The final construction, grading, and drainage plans approved by the consultant shall be submitted to the ~~Commission~~ **Executive Director** for review and approval.

2. ***In order to correct an inadvertent error in Special Condition 2, subsection f, the following revision is made:***

   f. Should any of the project's surface or subsurface drainage/filtration structures or other BMPs fail or result in increased erosion, the University shall be responsible for any necessary repairs to the drainage/filtration system or BMPs and restoration of the eroded area. Should repairs or restoration become necessary, prior to the commencement of such repair or restoration work, the applicant shall submit a repair and restoration plan to the Executive Director to determine if ~~an amendment or new coastal development permit~~ **a Notice of Impending Development (NOID)** is required to authorize such work.

3. ***In order to clarify the process for determining if minor changes to the final approved plans require approval of a NOID, the following revision is made to the concluding paragraph of Special Condition 2:***

The University shall undertake development in accordance with the approved final plans. Any proposed changes to the approved final plans shall be reported to the Executive Director. No changes to the approved final plans shall occur without a new Notice of Impending Development **unless the Executive Director determines that no NOID is required**.

4. ***The following changes are recommended to subsections A1 and A2 of Special Condition 3 (Landscaping Plan):***

1. All graded & disturbed areas on the subject site, other than the active debris basin and stockpile areas, shall be planted and maintained for erosion control purposes within (60) days of the completion of grading. To minimize the need for irrigation all landscaping shall consist primarily of native/drought resistant plants, as listed by the California Native Plant Society, Santa Monica Mountains Chapter, in their document entitled Recommended List of Plants for Landscaping in the Santa Monica Mountains, **up**dated **August 2007** ~~February 5, 1996~~. All native plant species shall be of local genetic stock. No plant species listed as problematic and/or invasive by the California Native Plant Society, the California Invasive Plant Council, or by the State of California shall be employed or allowed to naturalize or persist on the site. No plant species listed as a 'noxious weed' by the State of California or the U.S. Federal Government shall be utilized or maintained within the property.

2. All cut and fill slopes shall be stabilized with planting at the completion of final grading. Planting should be of native plant species indigenous to the Santa Monica Mountains using accepted planting procedures, consistent with fire safety requirements. All native plant species shall be of local genetic stock. Such planting shall be adequate to provide 90 percent coverage **within five (5)**~~two (2) years~~, and this requirement shall apply to all disturbed soils, other than the active debris basin and stockpile areas.

5. ***In order to clarify the intent of Special Condition 5 (Final Habitat Restoration and Enhancement Program) the second paragraph of subsection b is revised as follows:***

Five years from the ~~date of issuance~~ **project commencement** of this ~~coastal development permit~~**NOID**, the applicant shall submit for the review and approval of the Executive Director, a Habitat Restoration/Enhancement Monitoring Report, prepared by a qualified biologist or resource specialist that certifies whether the on-site restoration is in conformance with the restoration plan approved pursuant to this Special Condition. The monitoring report shall include photographic documentation of plant species and plant coverage.

6. ***The following change is recommended to Special Condition 4 (Sensitive Bird Surveys), subsection D to require an environmental resource specialist to monitor the project site during all vegetation clearance activities to ensure protection of sensitive bird species when active bird nests have not been previously identified:***

D. The environmental resource specialist shall be present during all **vegetation** clearing~~, grading or construction activities~~. The environmental resource specialist shall require the University to cease work should any breach in compliance occur, or if any unforeseen sensitive habitat issues arise. The environmental resource specialist(s) shall immediately notify the Executive Director if activities outside of the scope of Notice of Impending Development PEP-NOID-0004-15 occur.

7. ***In order to correct an inadvertent typographical error in the last paragraph on pages 11 the following revision is made:***

Pepperdine University proposes to proceed with three development projects that are part of the certified LRDP (this development was added to the LRDP pursuant to LRDPA 1-11 Part A, which was approved on December 13, ~~2013~~ **2012** with suggested modifications).

8. ***In order to clarify the intent of the Consistency Analysis in the second to last paragraph on page 15, the following revision is made:***

Therefore, the Commission finds that the notice of impending development, as conditioned, is consistent with the related LRDP Amendment No. 1-11 and ~~Coastal Act Sections~~ LRDP Policies with regard to the protection of environmentally sensitive resources.

CALIFORNIA COASTAL COMMISSION
SOUTH CENTRAL COAST AREA
89 SOUTH CALIFORNIA ST., SUITE 200
VENTURA, CA 93001
(805) 585-1800

W24b

DATE: August 27, 2015

TO: Commissioners and Interested Persons

FROM: Steve Hudson, Deputy Director
Barbara Carey, District Manager
Molly Troup, Coastal Program Analyst

SUBJECT: **Notice of Impending Development (NOID) PEP-NOID-0004-15** for the Debris Basin and Stockpile Relocation Project, for Public Hearing and Commission Action at the September 9, 2015, Commission Meeting in Arcata, CA.

SUMMARY OF STAFF RECOMMENDATION

Staff is recommending that the Commission, after public hearing, **approve** Notice of Impending Development (NOID) PEP-NOID-0004-15, as conditioned. Staff is recommending seven special conditions for NOID No. PEP-NOID-0004-15 to minimize impacts to biological resources and water quality and to ensure geological and engineering stability.

The impending development includes construction of a new debris basin, construction of a new stockpile site, and enhancement and restoration activities at four locations on the University property. The construction of a new debris basin will occur approximately 400 ft. upstream from the existing debris basin. The debris basin relocation will include construction of a paved access road, paved slopes of the basin, a new standpipe and paved standpipe base, construction of an interim drainage system, 16,000 cu. yds. of cut, 16,000 cu. yds. fill, and 35,000 cu. yds. of removal and re-compaction. The second component of this project, construction of the stockpile site, will include the removal of existing asphalt, curbs, lighting, surface drainage, and storage containers. A flat pad will be created for the deposition, temporary storage, and removal of soils for the construction of other projects approved in the certified LRDP. The stockpile area is approximately 9,000 sq. ft. in size and will have the capacity to hold approximately 4,000 cu. yds. of material (Exhibit 3). The third component of this NOID includes habitat enhancement in an area of the upper portion of Marie Canyon and habitat enhancement/restoration at three other sites on campus (Exhibit 9).

The project site is located on Pepperdine University, north of Huntsinger Circle Drive, which is on the north end of the developed campus. Other facilities near the project site include a terraced parking lot to the east, Facilities, Management, & Planning Buildings to the south, Drescher Graduate Campus to the west, and open space to the north (Exhibit 2).

The proposed NOID is consistent with the certified LRDP, including the development approved in the related LRDP Amendment No. 1-11, Part A, which provides for the Campus Life Project, a development infill project with six main components phased over twelve years. The proposed

NOID involves development that was included within the 5th component of LRDPA 1-11A, which is referred to as the "Enhanced Recreation Area". Relocating the existing debris basin and stockpile will ultimately allow for the expansion of the intramural recreation area, which will occur under a separate NOID. All construction activities will occur within the previously developed portion of the site or within areas currently subject to fuel modification. Although the project site itself does not contain environmentally sensitive habitat area (ESHA), the University has agreed to enhance the area north of the project footprint in Marie Canyon by removing concrete ruble and invasive species including Geraldton carnation spurge (E*uphorbia terracina)* and pampas grass (*Cortaderia selloana)*. In addition to the enhancement activities proposed for upper Marie Canyon, the University also proposes as part of the subject NOID, to restore 0.84 acres of coastal sage scrub, 0.48 acres of riparian habitat, and 0.29 acres of chaparral habitat in other areas of the campus (Exhibit 9). These mitigation activities were identified as additional mitigation measures for impacts to native habitats through the University's CEQA review process and have been included as part of the pending NOID. Because only preliminary restoration plans have been submitted, Special Condition Five (5) has been included and requires that the University submit a final Habitat Restoration, Enhancement, and Monitoring Program.

Although the project site itself does not contain environmentally sensitive habitat area (ESHA), the grading and construction activities proposed will result in the removal of ruderal native vegetation and exposed graded slopes. As such, several conditions have been incorporated to ensure that adjacent biological resources and water quality downstream are not adversely affected. Special Condition Two (2) requires that final drainage and runoff control plans are prepared which will serve to control the volume, velocity, and pollutant load of stormwater leaving the development site. Special Condition Four (4) specifies that sensitive bird species surveys must be conducted during nesting season to ensure that construction activities will not disrupt active nests of sensitive bird species.

The design and siting of new development must assure stability and structural integrity and not create or contribute to erosion, instability, or destruction of the site or surrounding areas. The University has submitted two engineering analyses that evaluate the geologic and soil conditions of the area and conclude that the stability of Marie Canyon will not be adversely impacted by the proposed construction. To ensure that the recommendations of the consultants have been incorporated into all proposed development, Special Condition One (1) has been included and requires the University to comply with and incorporate the recommendations contained in the submitted geologic reports into all final design and construction, and to obtain the approval of the geotechnical consultants prior to commencement of construction. Special Conditions Two (2) and Three (3) have been included to ensure that adequate drainage and erosion control measures are developed and implemented. Special Condition Seven (7) has been included due to the nature of the hazards that do exist in the vicinity and ensures that the University acknowledges these hazards in the context of the proposed development.

Staff recommends that the Commission determine that the Notice of Impending Development is consistent with the certified LRDP, only as conditioned to minimize adverse impacts to biological resources, water quality and to avoid hazards.

The standard of review for the proposed NOID is the policies of the certified Pepperdine University Long Range Development Plan.

Additional Information: For further information, please contact Molly Troup at the South Central Coast District Office of the Coastal Commission at (805) 585-1800. The Pepperdine University Notice of Impending Development No. PEP-NOID-0004-15 is available for review at the Ventura Office of the Coastal Commission.

TABLE OF CONTENTS

I. PROCEDURAL ISSUES

Section 30606 of the Coastal Act and Title 14, Sections 13547 through 13550 of the California Code of Regulations[1] govern the Coastal Commission's review of specific development projects proposed to be undertaken pursuant to a certified LRDP. Section 13549(b) requires the Executive Director or his designee to review the notice of impending development (or development announcement) within ten days of receipt and determine whether it provides sufficient

[1] All further references to regulations are to Title 14 of the California Code of Regulations

information to determine if the proposed development is consistent with the certified LRDP. The notice is deemed filed when all necessary supporting information has been received.

Pursuant to Section 13550(b) of the regulations, within thirty days of filing the notice of impending development, the Executive Director is to report to the Commission on the nature of the development and make a recommendation regarding the consistency of the proposed development with the certified LRDP. After a public hearing, by a majority of its members present, the Commission determines whether the development is consistent with the certified LRDP and whether conditions are required to bring the development into conformance with the LRDP. No construction shall commence until after the Commission votes to impose any conditions(s) necessary to render the proposed development consistent with the certified LRDP.

II. MOTION & RESOLUTION

The staff recommends that the Commission adopt the following resolution:

Motion:

> *I move that the Commission determine that the development described in the Notice of Impending Development PEP-NOID-0004-15 (Debris Basin and Stockpile Relocation Project), as conditioned, is consistent with the certified Pepperdine University Long Range Development Plan.*

Staff recommends a **YES** vote. Passage of this motion will result in a determination that the development described in the Notice of Impending Development PEP-NOID-0004-15 as conditioned, is consistent with the certified Pepperdine University Long Range Development Plan, 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 determines that the development described in the Notice of Impending Development PEP-NOID-0004-15, as conditioned, is consistent with the certified Pepperdine University Long Range Development Plan for the reasons discussed in the findings herein.*

III. SPECIAL CONDITIONS

1. Plans Conforming to Geotechnical Engineer's Recommendations

The University agrees to comply with the recommendations contained in all of the geology, geotechnical, and/or soils reports for the development. These recommendations, including recommendations concerning grading, and construction, shall be incorporated into all final design and construction plans, which must be reviewed and approved by the consultant prior to commencement of development. The final construction, grading, and drainage plans approved by the consultant shall be submitted to the Commission for review and approval.

2. Drainage and Polluted Runoff Control Plan

Prior to the commencement of construction, the University shall submit for the review and approval of the Executive Director, final drainage and runoff control plans, including supporting calculations. The plan shall be prepared by a licensed engineer and shall incorporate structural and non-structural Best Management Practices (BMPs) designed to control the volume, velocity and pollutant load of stormwater leaving the developed site. The plan shall be reviewed and approved by the consulting engineering geologist to ensure the plan is in conformance with geologist's recommendations. In addition to the specifications above, the plan shall be in substantial conformance with the following requirements:

a. Selected BMPs (or suites of BMPs) shall be designed to treat, infiltrate or filter the amount of stormwater runoff produced by all storms up to and including the 85th percentile, 24-hour runoff event for volume-based BMPs, and/or the 85th percentile, 1-hour runoff event, with an appropriate safety factor (i.e., 2 or greater), for flow-based BMPs.

b. Runoff shall be conveyed off site in a non-erosive manner.

c. Energy dissipating measures shall be installed at the terminus of outflow drains.

d. The plan shall include provisions for maintaining the drainage system, including structural BMPs, in a functional condition throughout the life of the approved development. Such maintenance shall include the following: (1) BMPs shall be inspected, cleaned and repaired when necessary prior to the onset of the storm season, no later than September 30th each year and (2) should any of the project's surface or subsurface drainage/filtration structures or other BMPs fail or result in increased erosion, the University shall be responsible for any necessary repairs to the drainage/filtration system or BMPs and restoration of the eroded area. Should repairs or restoration become necessary, prior to the commencement of such repair or restoration work, the University shall submit a repair and restoration plan to the Executive Director to determine if a new notice of impending development is required to authorize such work.

e. For projects located on a hillside, slope, or which may otherwise be prone to instability, final drainage plans shall be approved by the project consulting geotechnical engineer.

f. Should any of the project's surface or subsurface drainage/filtration structures or other BMPs fail or result in increased erosion, the University shall be responsible for any necessary repairs to the drainage/filtration system or BMPs and restoration of the eroded area. Should repairs or restoration become necessary, prior to the commencement of such repair or restoration work, the applicant shall submit a repair and restoration plan to the Executive Director to determine if an amendment or new coastal development permit is required to authorize such work.

g. The University shall implement the approved maintenance program such that drainage improvements and other BMP's function as designed and intended.

The University shall undertake development in accordance with the approved final plans. Any proposed changes to the approved final plans shall be reported to the Executive Director. No changes to the approved final plans shall occur without a new Notice of Impending Development.

3. Final Landscaping, Erosion Control & Fuel Modification Plan

Prior to commencement of construction, the University shall submit two sets of final landscaping and erosion control plans, prepared by a licensed landscape architect or a qualified resource specialist, for review and approval by the Executive Director. The plan shall incorporate the following criteria:

A) Landscaping Plan

1. All graded & disturbed areas on the subject site, other than the active debris basin and stockpile areas, shall be planted and maintained for erosion control purposes within (60) days of the completion of grading. To minimize the need for irrigation all landscaping shall consist primarily of native/drought resistant plants, as listed by the California Native Plant Society, Santa Monica Mountains Chapter, in their document entitled Recommended List of Plants for Landscaping in the Santa Monica Mountains, dated February 5, 1996. All native plant species shall be of local genetic stock. No plant species listed as problematic and/or invasive by the California Native Plant Society, the California Invasive Plant Council, or by the State of California shall be employed or allowed to naturalize or persist on the site. No plant species listed as a 'noxious weed' by the State of California or the U.S. Federal Government shall be utilized or maintained within the property.

2. All cut and fill slopes shall be stabilized with planting at the completion of final grading. Planting should be of native plant species indigenous to the Santa Monica Mountains using accepted planting procedures, consistent with fire safety requirements. All native plant species shall be of local genetic stock. Such planting shall be adequate to provide 90 percent coverage within two (2) years, and this requirement shall apply to all disturbed soils, other than the active debris basin and stockpile areas.

3. Plantings will be maintained in good growing condition throughout the life of the project and, whenever necessary, shall be replaced with new plant materials to ensure continued compliance with applicable landscape requirements.

The University shall undertake development in accordance with the final approved plan. Any proposed changes to the approved final plan shall be reported to the Executive Director. No changes to the approved final plan shall occur without a Coastal Commission approved notice of impending development, unless the Executive Director determines that no NOID is required.

B. Interim Erosion Control Plan

(1) The plan shall specify that grading shall take place only during the dry season (April 1 – October 31). This period may be extended for a limited period of time if the situation warrants such a limited extension, if approved by the Executive Director. If a limited extension is approved, the University shall install or construct temporary sediment basins (including debris basins, desilting basins, or silt traps), temporary drains and swales, sand bag barriers, silt fencing, and shall stabilize any stockpiled fill with geofabric covers or other appropriate cover, install geotextiles or mats on all cut or fill slopes, and close and stabilize open trenches as soon as possible. Basins shall be sized to handle not less than a 10 year, 6 hour duration rainfall intensity event.

(2) The erosion control measures shall be required on the project site prior to or concurrent with the initial grading operations and maintained throughout the development process to minimize erosion and sediment from runoff waters during construction. All sediment should be retained on-site, unless removed to an appropriate, approved dumping location either outside of the coastal zone or within the coastal zone to a site permitted to receive fill.

(3) The plan shall also include temporary erosion control measures should grading or site preparation cease for a period of more than 30 days, including but not limited to: stabilization of all stockpiled fill, access roads, disturbed soils and cut and fill slopes with geotextiles and/or mats, sand bag barriers, silt fencing; temporary drains and swales and sediment basins. The plans shall also specify that all disturbed areas shall be seeded with native grass species and include the technical specifications for seeding the disturbed areas. These temporary erosion control measures shall be monitored and maintained until grading or construction operations resume.

(4) All temporary, construction related erosion control materials shall be comprised of bio-degradable materials (natural fiber, not photo-degradable plastics) and must be removed when permanent erosion control measures are in place. Bio-degradable erosion control materials may be left in place if they have been incorporated into the permanent landscaping design.

4. Construction Timing and Sensitive Bird Species Surveys

For clearing, grading, or construction activities between April 1 and September 1, The University shall retain the services of a qualified biologist or environmental resource specialist (hereinafter, "environmental resources specialist") to conduct raptor and other sensitive bird species surveys and monitor project operations. At least 30 calendar days prior to commencement of any project operations, the University shall submit the name and qualifications of the environmental resource specialist, for the review and approval of the Executive Director. The environmental resources specialist shall ensure that all project construction and operations shall be carried out consistent with the following:

A. The University shall ensure that a qualified environmental resource specialist with experience in conducting bird surveys shall conduct bird surveys 14 calendar days prior to the clearing, grading, or construction activities to detect any active bird nests in all trees or other appropriate vegetation within 500 feet of the project. A follow-up survey must be conducted 3 calendar days prior to the initiation of clearance/construction and nest surveys must continue on a monthly basis throughout the nesting season or until the project is completed, whichever comes first.

B. If an active nest of any federally or state listed threatened or endangered species, species of special concern, or any species of raptor is found within 300 ft. of the project (500 ft. for raptors), the University shall postpone any clearing, grading or construction within 300 feet (500 feet for raptors) until the nest(s) is vacated, juveniles have fledged and there is no evidence of a second attempt at nesting.

C. If an active nest of a federally or state-listed threatened or endangered species, bird species of special concern, or any species or raptor is found, Pepperdine will notify the appropriate State and Federal Agencies within 24 hours, and appropriate action specific to each incident will be developed. Pepperdine will notify the California Coastal Commission by e-mail within 24 hours and consult with the Commission regarding determinations of State and Federal agencies.

D. The environmental resource specialist shall be present during all clearing, grading or construction activities. The environmental resource specialist shall require the University to cease work should any breach in compliance occur, or if any unforeseen sensitive habitat issues arise. The environmental resource specialist(s) shall immediately notify the Executive Director if activities outside of the scope of Notice of Impending Development PEP-NOID-0004-15 occur.

5. Final Habitat Restoration/Enhancement Plans

Prior to the commencement of construction, the University shall submit, for the review and approval of the Executive Director, a detailed Final Habitat Restoration/Enhancement Plan and Monitoring Program, prepared by a biologist or environmental resource specialist with qualifications acceptable to the Executive Director, that includes the following habitat restoration/enhancement activities on the campus: 1) removal of concrete ruble and invasive plant species from the upper Marie Canyon area; 2) invasive plant removal and coastal sage scrub restoration on slopes west of John Tyler Drive; 3) invasive plant removal and riparian enhancement in Winter Canyon Creek; and 4) chaparral restoration north of Drescher Graduate Campus. The plans shall identify the species, extent, and location of all plant materials to be removed or planted and shall incorporate the following criteria:

a. Technical Specifications

The Restoration Plan shall provide for the following:

i. Removal of concrete ruble, carnation spurge (*Euphorbia terracina)* and pampas grass (*Cortaderia selloana)* from the upper Marie Canyon area.
ii. Removal of invasive Spanish Broom vegetation and restoration of 0.84-acres of California encelia scrub habitat area on slopes west of John Tyler Drive.
iii. Removal of invasive plant species and planting of 0.48-acres of riparian plant species in Winter Canyon Creek.
iv. Restoration of 0.29-acres of chaparral habitat north of Drescher Graduate Campus.

The plan shall include detailed documentation of conditions on site prior to the approved construction activity (including photographs taken from pre-designated sites annotated to a copy of the site plans) and specify restoration goals and specific performance standards to judge the success of the restoration effort.

The plan shall also provide information on removal methods for exotic species, salvage of existing vegetation, revegetation methods and vegetation maintenance. The plan shall further include details regarding the types, sizes, and location of plants to be placed within the restoration/enhancement areas. Only native plant species appropriate for each habitat type and which are endemic to the Santa Monica Mountains shall be used, as listed by the California Native Plant Society - Santa Monica Mountains Chapter in their document entitled Recommended List of Native Plants for Landscaping in the Santa Monica Mountains, updated August 2007. All native plant species shall be of local genetic stock. No plant species listed as problematic and/or invasive by the California Native Plant Society, the California Invasive Plant Council, or by the State of California shall be employed or allowed to naturalize or persist on the site. No plant species listed as a 'noxious weed' by the State of California or the U.S. Federal Government shall be utilized or maintained within the property. Site restoration shall be deemed successful if the revegetation of native plant species on site is adequate to provide 90% coverage by the end of the five (5) year monitoring period and is able to survive without additional outside inputs, such as supplemental irrigation. The plan shall also include a detailed description of the process, materials, and methods to be used to meet the approved goals and performance standards and specify the preferable time of year to carry out restoration activities and describe the interim supplemental watering requirements that will be necessary.

b. Monitoring Program

A monitoring program shall be implemented to monitor the project for compliance with the specified guidelines and performance standards. The applicant shall submit, upon completion of the initial planting, a written report prepared by a qualified resource specialist, for the review and approval of the Executive Director, documenting the completion of the initial planting/revegetation work. This report shall also include photographs taken from pre-designated sites (annotated to a copy of the site plans) documenting the completion of the initial planting/revegetation work.

Five years from the date of issuance of this coastal development permit, the applicant shall submit for the review and approval of the Executive Director, a Habitat Restoration/Enhancement Monitoring Report, prepared by a qualified biologist or resource specialist that certifies whether the on-site restoration is in conformance with the restoration plan approved pursuant to this Special Condition. The monitoring report shall include photographic documentation of plant species and plant coverage.

If the monitoring report indicates the vegetation and restoration/enhancement is not in conformance with or has failed to meet the performance standards specified in the restoration plan approved pursuant to this permit, the applicant, or successors in interest, shall submit a revised or supplemental restoration plan for the review and approval of the Executive Director and shall implement the approved version of the plan. The revised restoration plan must be prepared by a qualified biologist or resource specialist and shall specify measures to remediate those portions of the original plan that have failed or are not in conformance with the original approved plan.

6. Removal of Construction Material

Prior to commencement of construction activities, the University shall provide evidence to the Executive Director of the location of the disposal site for all excess construction material and debris (removed during demolition, construction, and habitat enhancement) from the site. If the disposal site is located in the Coastal Zone, the disposal site must have a valid CDP for the disposal of fill material and debris. If the disposal site does not have a CDP, such a CDP will be required prior to the disposal of material.

7. Assumption of Risk, Waiver of Liability and Indemnity

The University acknowledges and agrees (i) that the site of the development described in PEP-NOID-0004-15 may be subject to hazards from landsliding, earth movement, and erosion; (ii) to assume the risks to the University and the property that is the subject of this development of injury and damage from such hazards in connection with this 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 development 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.

IV. FINDINGS FOR APPROVAL OF THE NOTICE OF IMPENDING DEVELOPMENT

The Commission hereby finds and declares:

A. PROJECT DESCRIPTION AND BACKGROUND

Pepperdine University proposes to proceed with three development projects that are part of the certified LRDP (this development was added to the LRDP pursuant to LRDPA 1-11 Part A, which was approved on December 13, 2013 with suggested modifications). This development includes constructing a new relocated debris basin, constructing a new stockpile site, and

enhancing the area north of the project footprint in Marie Canyon by removing concrete ruble and invasive species as mitigation for vegetation removal. Additionally, the University proposes to enhance three other sites on campus. The debris basin will be located 400 ft. upstream from its current location and will be constructed with 6,000 cu. yds. of material from the current stockpile and 10,000 cu. yds. of material from the proposed debris basin site. Removal and re-compaction of 35,000 cubic yds. of uncertified fill material is proposed to occur under the southern dam of the debris basin (Exhibits 6 and 8). This remedial grading is necessary in order to support the placement of fill in this area to function as the basin embankment. Additional elements of the new debris basin include a paved access road, paved facing on the side slopes of the basin, a new standpipe and standpipe base, and construction of an interim drainage system. The interim drainage system will consist of approximately 155 ft. of conveyance pipe from the proposed debris basin that will connect with a temporary asphalt conveyance ditch extending through the existing debris basin. The terminus of the conveyance ditch will connect to the existing stand pipe and conveyance pipe that ultimately connects to the main storm drain line at Huntsinger Circle (Exhibit 5). The permanent drainage system will be constructed pursuant to a future NOID prior to the construction of the enhanced recreation field. The stockpile will be approximately 9,000 sq. ft. with the capacity to hold approximately 4,000 cu. yards of material and be relocated southeast of where the existing stockpile site is currently located. This relocation will involve the removal of existing development within the new stockpile site area including pavement, lights, surface drainage, curbs, and storage containers.

The entire footprint of the proposed development occurs within historically disturbed areas which include existing development and undeveloped, vegetated areas that are currently managed for fuel modification. Some remnant native vegetation grows within the central retention basin area of the current debris basin as well as in the area of Marie Canyon proposed for the new recreational area pad. However, the vegetation is highly managed for fuel modification and is sparse and fragmented and does not contain environmentally sensitive habitat. As part of its action on LRDPA 11-1, Part A, the Commission found that the affected areas do not contain environmentally sensitive habitat areas (ESHA) within the meaning of Coastal Act Section 30107.5. Although the proposed development does not occur within ESHA, the University has agreed to not grade or remove vegetation from the northwest shoulder of the proposed debris basin, depicted as Area 1 on Exhibit 4. In a letter dated November 28, 2012, the University proposed, as part of LRDPA 11-1, Part A, to remove concrete ruble, carnation spurge (*Euphorbia terracina)* and pampas grass (*Cortaderia selloana)* from the upper Marie Canyon area, depicted as Area 3 on Exhibit 4. This removal was proposed to enhance habitat values in this area and mitigate the impacts of native vegetation removal. In addition to the enhancement activities proposed for upper Marie Canyon, the University also proposes as part of the subject NOID, to restore 0.84 acres of coastal sage scrub, 0.48 acres of riparian habitat, and 0.29 acres of chaparral habitat in other areas of the campus (Exhibit 9). These mitigation activities were identified as additional mitigation measures for impacts to native habitats through the University's CEQA review process and have been included as part of the pending NOID.

B. CONSISTENCY ANALYSIS

The standard of review for a Notice of Impending Development is consistency with the certified Long Range Development Plan (LRDP). On September 12, 1989, the Commission denied the

Pepperdine University LRDP as submitted and approved it with suggested modifications necessary to bring the LRDP into conformance with the Coastal Act. On February 7, 1990, the Board of Regents of the University acknowledged the receipt of the Commission's certification and agreed to the terms of the modifications to the LRDP. On April 12, 1990, the Commission concurred with the Executive Director's determination that the Board's action accepting the certification was legally adequate and sent such determination to the Secretary of Resources, thereby effectively certifying the LRDP. Since that time, the LRDP has been amended several times.

The most recent LRDP Amendment, LRDPA 1-11A, was approved by the Commission on December 13, 2012 with suggested modifications. The Pepperdine University Board of Regents Executive Committee approved a resolution on May 4, 1994 authorizing the University's Executive Vice President to bind the University and accept on its behalf amendments and modifications to the LRDP suggested by the Commission. Accordingly, on June 6, 2013, the University accepted and agreed to all modifications suggested by the Commission. Thus, the University's LRDP as amended by LRDPA 1-11, Part A, was certified as of September 11, 2013 and is now in effect. LRDPA 1-11, Part A included a 12-year, phased infill project for the existing developed area of Pepperdine's 830-acre Malibu campus. Six main components were included in the LRDP amendment, including a plan for an enhanced recreation area. The impending development of the subject NOID includes the relocation of the debris basin and the adjacent stockpile, both of which are in the same area of the campus as the enhanced recreation area (Exhibit 4). A portion of the future recreation area will occupy the location of the currently existing debris basin. The future development of the recreation area will be subject to a NOID.

Biological Resources

Pepperdine's LRDP contains several policies and provisions which provide requirements for the preservation and protection of unique and valuable natural resources and ESHA located on University Property. Several policies included in Section I of Pepperdine's LRDP that support this goal include the following:

- All development which alters either Marie Canyon blue line stream or any tributary stream corridors of Marie Canyon shall mitigate on-site for the removal of habitat.
- Where development will adversely impact environmentally sensitive areas as defined by Section 30107.5 of the Coastal Act or where development will result in the removal of upland vegetation, a restoration/enhancement plan which includes maintenance, monitoring, and reporting shall be provided on-site to serve to mitigate and minimize said impacts.
- All restoration/enhancement project performed shall submit to the Coastal Commission Executive Director and to L.A. County ERB a final report prepared by a qualified biologist, ecologist, or resource specialist, a minimum of five years after project start. The report shall indicate whether the restoration project has, in part, or in whole, been successful based on performance standards required of said project. Projects involving revegetation solely for the purpose of erosion control,

ornamental landscaping, or student research shall not be subject to the provision of this policy.

- All project mitigation shall occur prior to or concurrent with construction of the development that it is serving to mitigate.

The development proposed in the subject NOID, is located in Marie Canyon, adjacent to the north side of Huntsinger Circle Drive, which is on the outer edge of the developed campus and abuts open space areas on campus (Exhibit 2). The development includes a relocated debris basin and relocated stockpile. The debris basin will be moved upstream from its existing location approximately 400 ft. and will occupy an area that is either already developed with the existing approved stockpile site or within area subject to required fuel modification for existing University structures. The stockpile site will be smaller in size than the existing stockpile and relocated directly south onto an area that is currently covered by asphalt, curbs, and storage containers. Therefore, the entire footprint of the proposed debris basin and stockpile site development encompasses either existing development or vegetation that is currently disturbed for fuel modification. Biological surveys conducted for the proposed development identified the following vegetation types in the project area: disturbed areas dominated by invasive weeds or exotic landscaping, disturbed native chaparral, disturbed coastal sage scrub, and disturbed riparian.

The area of Marie Canyon proposed for the new debris basin and stockpile pad is primarily already developed but does contain some remnant native vegetation. The vegetation is highly managed for fuel modification. Thus, as the result of trimming, thinning and clearing, and of periodic management of the retention basin, the vegetation in the project site is sparse and fragmented. Some vegetation grows within the central retention basin area, where routine maintenance to clear sediment, debris and vegetation is an essential part of maintaining the function of the structure and an ongoing pattern of disturbance. Biological surveys conducted for the proposed development identified the following vegetation types in the project area: disturbed areas dominated by invasive weeds or exotic landscaping, disturbed native chaparral, disturbed coastal sage scrub, and disturbed riparian. On October 30, 2012, Commission staff including the Commission's staff Ecologist Dr. Jonna Engel visited the site and confirmed that these are the on-the-ground habitats and that the areas within the proposed development footprint are significantly disturbed. Based on the site specific biological resource analysis and staff's confirmation, the affected areas do not contain environmentally sensitive habitat areas within the meaning of Coastal Act Section 30107.5.

Nevertheless, even though the habitat does not constitute Environmentally Sensitive Habitat Area as defined by the Coastal Act, the University proposes to enhance the area north of the footprint of disturbance associated with the development within Marie Canyon to offset the loss of remnant native vegetation resulting from the proposed development. In addition to the Marie Canyon Enhancement proposal, the University also proposes as part of the subject NOID, to restore 0.84 acres of coastal sage scrub, 0.48 acres of riparian habitat, and 0.29 acres of chaparral habitat in other areas of the campus (Exhibit 9). Specifically, the University has also proposed to mitigate 0.48 acres consisting of 0.13 acres CDFG jurisdictional habitat and 0.35 acres of ACOE non-wetland waters/CDFG jurisdictional habitat both in the Winter Canyon drainage, 0.29 acres

of chaparral restoration near the Drescher Graduate Campus, and 0.84 acres of coastal sage scrub restoration west of the Tari Frahm Rokus Field (Exhibit 9).

In the Winter Canyon drainage, proposed restoration activities include removal of invasive species including pampas grass, Terracina spurge, sweet fennel, and umbrella sedge. Appropriate native species will be planted in place of the removed vegetation. At the Drescher Graduate Campus site, the University proposes to restore the disturbed areas to chaparral. This will include removing the invasive plant species in the area. At the John Tyler Drive site (west of the Tari Frahm Rokus Field), the restoration activities include the removal of Spanish broom infestation and restoration of the site to coastal sage scrub including restoration of 0.41 acres of California encelia scrub. The University will also remove dispersed Spanish broom within existing fuel modification zones on the slopes surrounding the restoration site and eradicate other invasive species at the John Tyler Drive Site. The University has submitted preliminary plans for these restoration/enhancement activities which indicate the location, area, and a brief description of each project. However, the University has not submitted final restoration/enhancement plans for these areas. In order to ensure that the restoration/enhancement is adequately implemented, the Commission finds it necessary to require the University to provide final plans including but not limited to details regarding plantings, success criteria, and monitoring. Therefore **Special Condition Five (5)** requires the University to submit a final Habitat Restoration, Enhancement, and Monitoring Program which shall include, at a minimum, the removal of any and all invasive plant species on the site; revegetation of disturbed areas with appropriate native species, including areas where invasive and non-native plants were removed, success criteria and a documentation and reporting plan.

Although the project site does not contain ESHA, it does border open space areas on the campus that do contain ESHA and will require removal of some ruderal and native vegetation. As such, there is the potential to impact nesting bird species during construction. To mitigate these potential impacts, **Special Condition Four (4)** specifies that a qualified environmental resource specialist shall conduct pre-construction bird surveys to determine whether nesting or breeding behavior is occurring within 500 feet of the project site. If a sensitive bird species is exhibiting nesting behavior, the University must postpone development in that area until all birds have fledged, as well as contact all appropriate agencies to determine the proper course of action to protect the species. The nest may not be disturbed or removed and a biological monitor must be present during all construction activities to monitor the potential impacts to nesting birds. Where no bird breeding behavior is initially observed, the environmental resource specialist shall conduct monthly follow-up surveys during the bird breeding/nesting season.

Therefore, the Commission finds that the notice of impending development, as conditioned, is consistent with the related LRDP Amendment No. 1-11 and Coastal Act Sections with regard to the protection of environmentally sensitive resources.

Water Quality

The proposed development has the potential to impact downstream water quality and habitat areas, including the unchannelized portions of Marie Canyon and the ocean habitats of Santa

Monica Bay. The potential impacts include increased erosion and sedimentation, increased volume or velocity of runoff which can alter the natural stream regime, and introduction of point or non-point pollutants. Increased erosion and sedimentation could bury habitat areas. Increased runoff velocity or amount as a result of additional impervious surfaces could alter the natural stream regime. Pollutants could be introduced to the stream flow which could kill fish directly or damage habitat area.

The certified LRDP contains the following policy that requires new development to prevent or mitigate impacts:

- *All future developments will incorporate measures to mitigate and/or prevent significant damage to the environment.*

The impending development consists of relocating the debris basin, the campus stockpile, and habitat restoration and enhancement. The project would involve approximately 32,000 cu yds. of grading (16,000 cu. yds. cut, and 16,000 cu. yds. fill) to construct the relocated debris basin. Interim erosion control measures implemented during construction and post construction landscaping will serve to minimize the potential for adverse impacts to water quality resulting from drainage runoff during construction and in the post-development stage. Therefore, the Commission finds it is necessary to require the University to incorporate such measures into the proposed development. **Special Condition Two (2)** requires final post-construction drainage plans to ensure the proposed development will not adversely impact water quality or coastal resources.

Although the impending development of a new debris basin, interim drainage system, and stockpile site occurs in an area with existing development, the pending project involves grading of sloping hillside terrain with soils that are susceptible to erosion. Further, pollutants commonly found in runoff reduce the biological productivity and the quality of coastal waters and have adverse impacts on human health. As such, the Commission finds it necessary to require the incorporation of Best Management Practices designed to control the volume, velocity and pollutant load of stormwater leaving the project site. Critical to the successful function of post-construction structural BMPs in removing pollutants in stormwater to the Maximum Extent Practicable (MEP), is the application of appropriate design standards for sizing BMPs. The majority of runoff is generated from small storms because most storms are small. Additionally, storm water runoff typically conveys a disproportionate amount of pollutants in the initial period that runoff is generated during a storm event. Designing BMPs for the small, more frequent storms, rather than for the large infrequent storms, results in improved BMP performance at lower cost.

The Commission finds that sizing post-construction structural BMPs to accommodate (infiltrate, filter or treat) the amount of stormwater produced by all storms up to and including the 85th percentile, 24 hour storm event, in this case, is equivalent to sizing BMPs based on the point of diminishing returns (i.e. the BMP capacity beyond which, insignificant increases in pollutants removal (and hence water quality protection) will occur, relative to the additional costs. Therefore, the Commission requires the selected post-construction structural BMPs be sized

based on design criteria specified in **Special Condition No. Two (2)**, and finds this will ensure the proposed development will be designed to minimize adverse impacts to coastal resources.

The Commission finds that only as conditioned is the impending development consistent with applicable LRDP policies regarding significant impacts to the environment and water quality.

Hazards and Safety

The proposed development is located in the Santa Monica Mountains, an area that is generally considered to be subject to an unusually high amount of natural hazards. Geologic hazards common to the Santa Monica Mountains area include landslides, erosion, and flooding. In addition, fire is an inherent threat to the indigenous chaparral community of the coastal mountains. Wildfires often denude hillsides in the Santa Monica Mountains of all existing vegetation, thereby contributing to an increased potential for erosion and landslides on property.

The certified 1990 LRDP mandates that new development be sited and designed to provide geologic stability and structural integrity, and minimize risks to life and property in areas of high geologic, flood, and fire hazard. In particular, the LRDP includes the following policies in relation to geology and hazards:

- *All available safety standards, regulations, and related research information will be incorporated into the planning and design of all new developments.*

- *All structures will be constructed in accordance with Los Angeles county codes.*

The proposed development will take place in Marie Canyon, which is located directly up-gradient of the main reaches of the developed lower campus area of Pepperdine University (Exhibit 2). The existing area of the canyon has been altered for flood control purposes in the past, partially because of the high topographic relief of the canyon. Under high flow conditions during the rainy season, the flood control structures in the canyon provide a vital safety function and protect the down-gradient campus from flooding. The retention basin is used to trap sediment and debris and is managed periodically to remove deposited material, which restores the system's drainage capacity. The proposed development will relocate this basin approximately 400 feet upstream in a manner that ensures the hydraulic regime, debris interception, and overall stability of the area. An analysis of the outflow of the proposed relocated Debris Basin was performed by Spindler Engineering (2010) and concluded that the new debris basin will be able to handle the amount of run-off estimated for the watershed.

Construction of the new debris basin will include 16,000 cubic yards of cut, 16,000 cubic yards of fill, and 35,000 cubic yards of removal and re-compaction. The project will not require the import or export of fill, but it will reallocate and balance existing earthen material within the site. Exhibit 6 illustrates the new grade that will be cut and the placement of the cut material to make the southern dam. In order to protect sensitive habitat, the University agrees to not grade a portion of the streambed northwest of the proposed basin as depicted as Area 1 on Exhibit 4. Currently, unknown and uncertified fill has been identified at the proposed debris basin site. In

order to construct the proposed southern dam, which is necessary as part of the basin embankment, the University proposes to remove and re-compact 35,000 cubic yards of material under the location where the dam will be constructed. The proposed removal and re-compaction occurs within the approved project boundary at the southern portion of the proposed basin and the northeastern area of the existing basin. The extent and depth of the removal and re-compaction is depicted on Exhibit 8. The proposed removal and re-compaction will not occur in Areas 1, 2, or 3, as depicted in Exhibit 4, which are the areas not subject to grading.

Wildfires have burned through the Santa Monica Mountains and right to the edge of campus several times since 1971. As such, the existing stockpile, debris basin, and recreation facilities situated at the north end of the developed campus have served as a fire break for fires that have come through Marie Canyon since the campus opened in 1971. The relocation of the debris basin and stockpile included in this NOID and the expansion of the recreation field (which will be constructed pursuant to a future NOID) will maintain this historic function as a fire break for the rest of the University campus.

The submitted geology, geotechnical, and/or soils reports referenced as Substantive File Documents conclude that the project site is suitable for the proposed project based on the evaluation of the site's geology in relation to the proposed development. The reports contain recommendations to be incorporated into the project plans to ensure the stability and geologic safety of the proposed project, the project site, and the adjacent properties. To ensure stability and structural integrity and to protect the site and the surrounding sites, the Commission requires the University to comply with the recommendations contained in the applicable reports, to incorporate those recommendations into all final design and construction plans, and to obtain the geotechnical consultant's approval of those plans prior to the commencement of construction, which is detailed as **Special Condition One (1)**.

Additionally, to minimize erosion and ensure stability of the project site, the project must include adequate drainage and erosion control measures. In order to achieve these goals, the Commission requires the University to submit post-construction drainage and construction phase and interim erosion control plans certified by the geotechnical engineer. These plans are required as **Special Condition Two (2)** and **Special Condition Three (3)**.

Although the conditions described above render the project sufficiently stable to satisfy the requirements of the LRDP policies, no project is wholly without risks. Due to the fact that the proposed project is located in an area subject to an extraordinary potential for damage or destruction from natural hazards, including landsliding and erosion, those risks remain substantial here. If the University nevertheless chooses to proceed with the project, the Commission requires the University to assume the liability from these associated risks. Through the assumption of risk condition detailed in **Special Condition Seven (7)**, the University acknowledges the nature of the fire and/or geologic hazard that exists on the site and that may affect the safety of the proposed development.

For the reasons stated above, the Commission, therefore, finds that the notice of impending development, as conditioned, is consistent with the applicable LRDP policies that pertain to biological resources, water quality, and safety and hazards.

Appendix A - Substantive File Documents

Pepperdine University Notice of Impending Development, dated June 18, 2015; Upper Marie Canyon Enhancement Plan Memorandum, prepared by Envicom, dated July 17, 2015; LRDPA No. 1-11, Part A (Campus Life Project) Adopted Findings Dated November 14, 2013; Pepperdine University Campus Life Project Final Environmental Impact Report, prepared by Envicom Corporation, dated March 31, 2011; Geotechnical Review of Potential Impacts for CEQA document Submittal, prepared by Stoney-Miller Consultants, dated October 14, 2010,

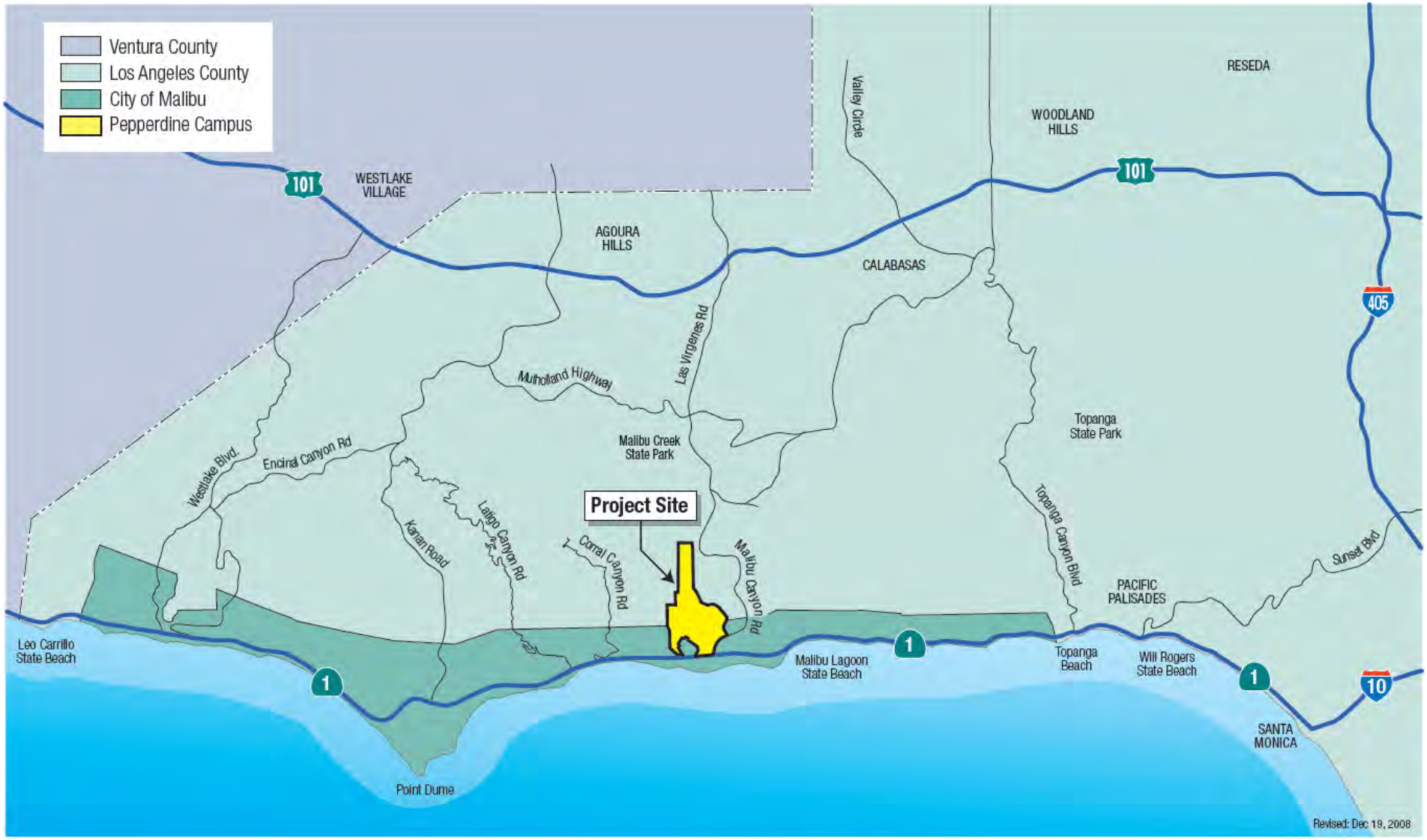
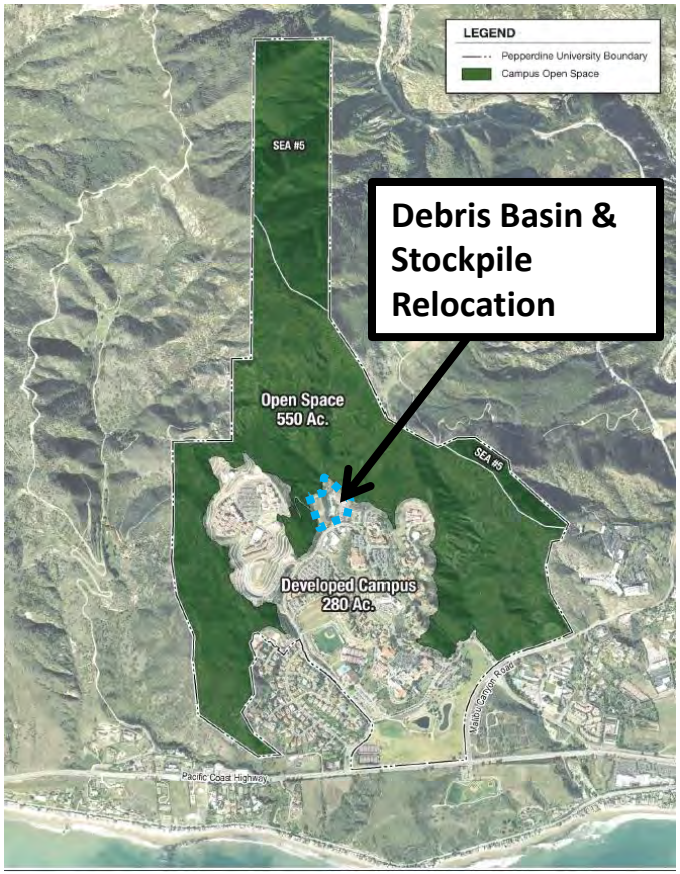


Exhibit 1
PEP-NOID-0004-15
Vicinity Map


LEGEND
Pepperdine University Boundary
Campus Open Space
SEA #6
Debris Basin & Stockpile Relocation
Open Space 550 Ac.
SEA #5
Developed Campus 280 Ac.
Malibu Canyon Road
Pacific Coast Highway


Pepperdine Campus Boundary
Campus Life Project Components
1 Student Housing Rehabilitation
2 Athletics/Events Center
3 Upgraded NCAA Soccer Field
4 Town Square
5 Enhanced Recreation Area
6 School of Law Parking Structure
Debris Basin & Stockpile Relocation
Huntsinger Cir.
Seaver Dr.
John Tyler Dr.
Barrowsky Blvd.
Malibu Country Estates
Pacific Coast Highway
Malibu Bluffs State Recreation Area
Malibu Canyon Rd.
Exhibit 2
PEP-NOID-0004-15
Ariel Photos

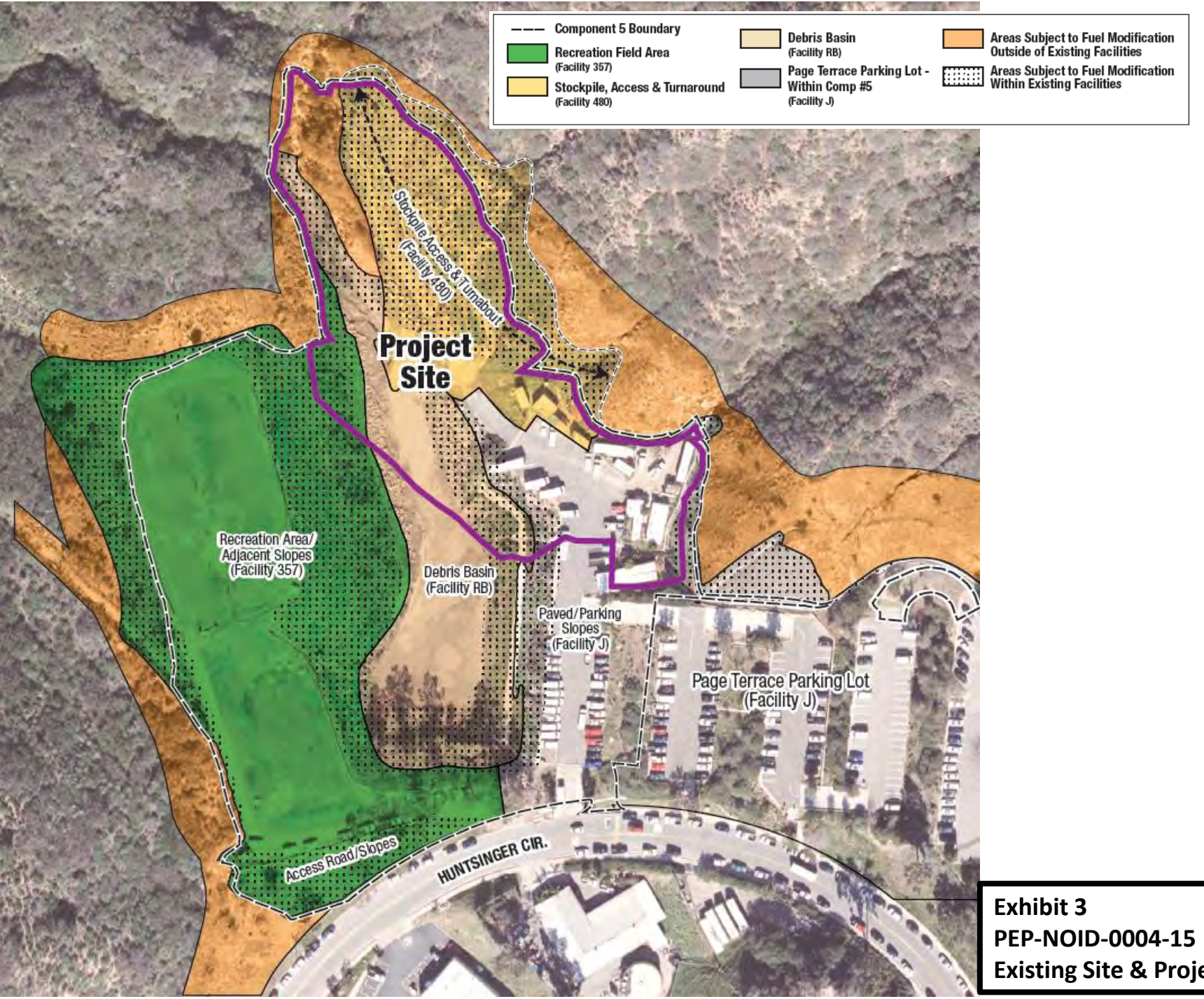
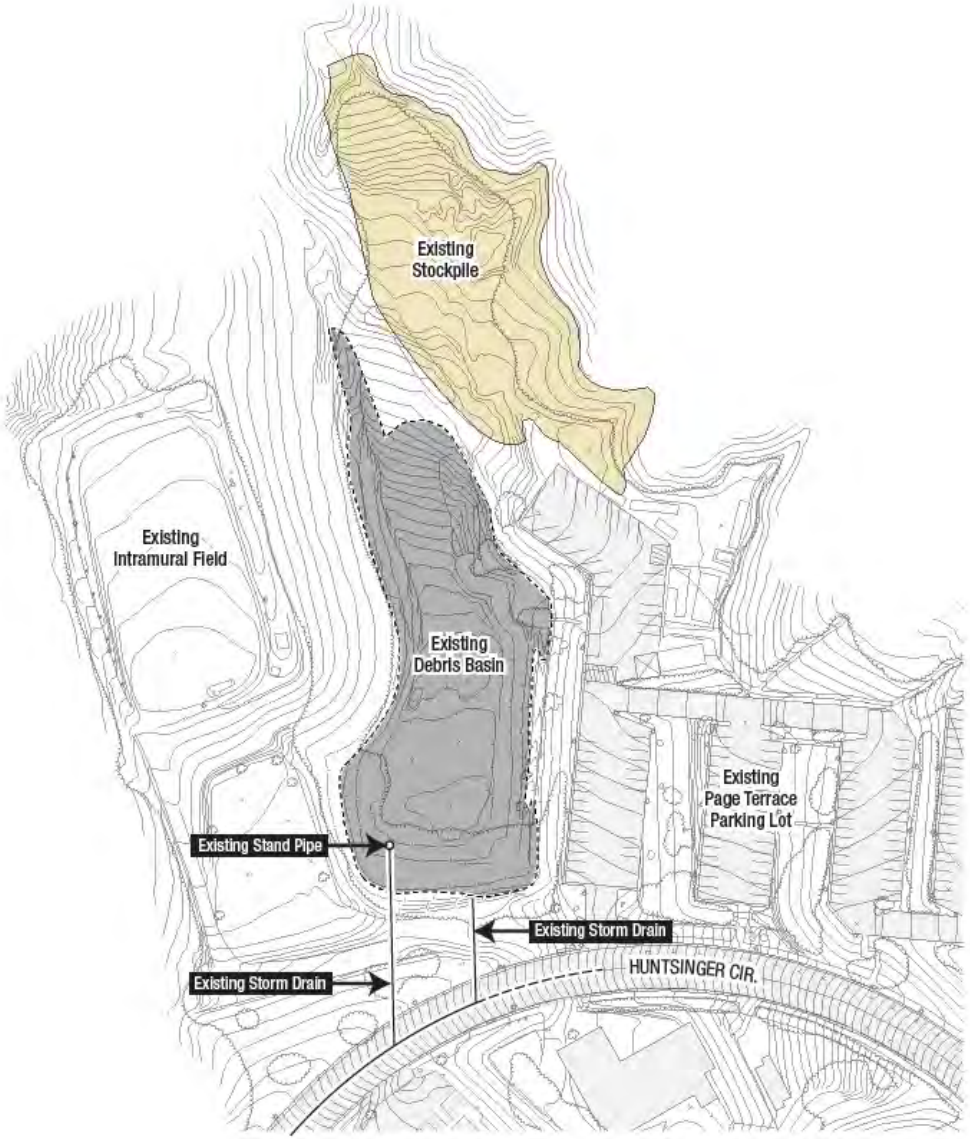
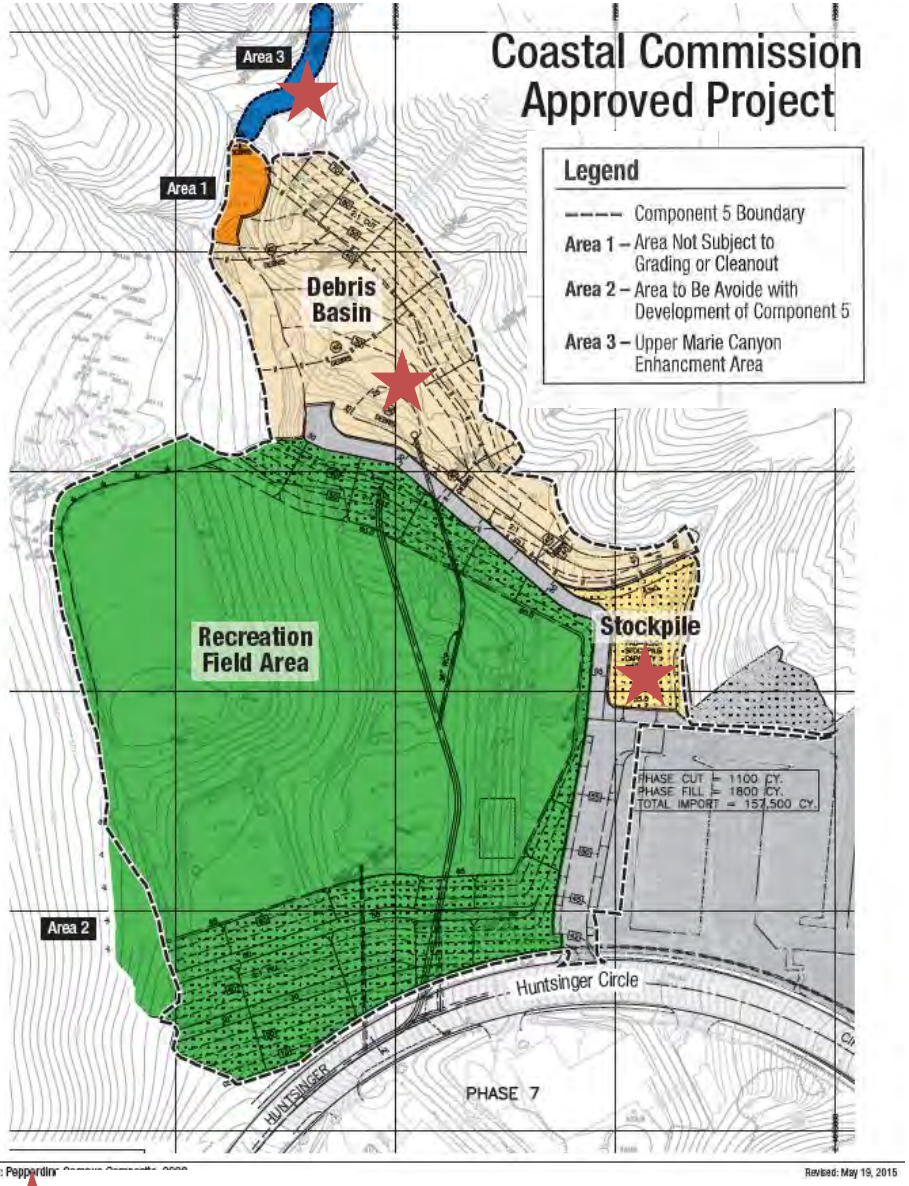


Exhibit 3
PEP-NOID-0004-15
Existing Site & Project Overlay





Proposed Work

Exhibit 4
PEP-NOID-0004-15
Site Plan: Existing vs. Proposed

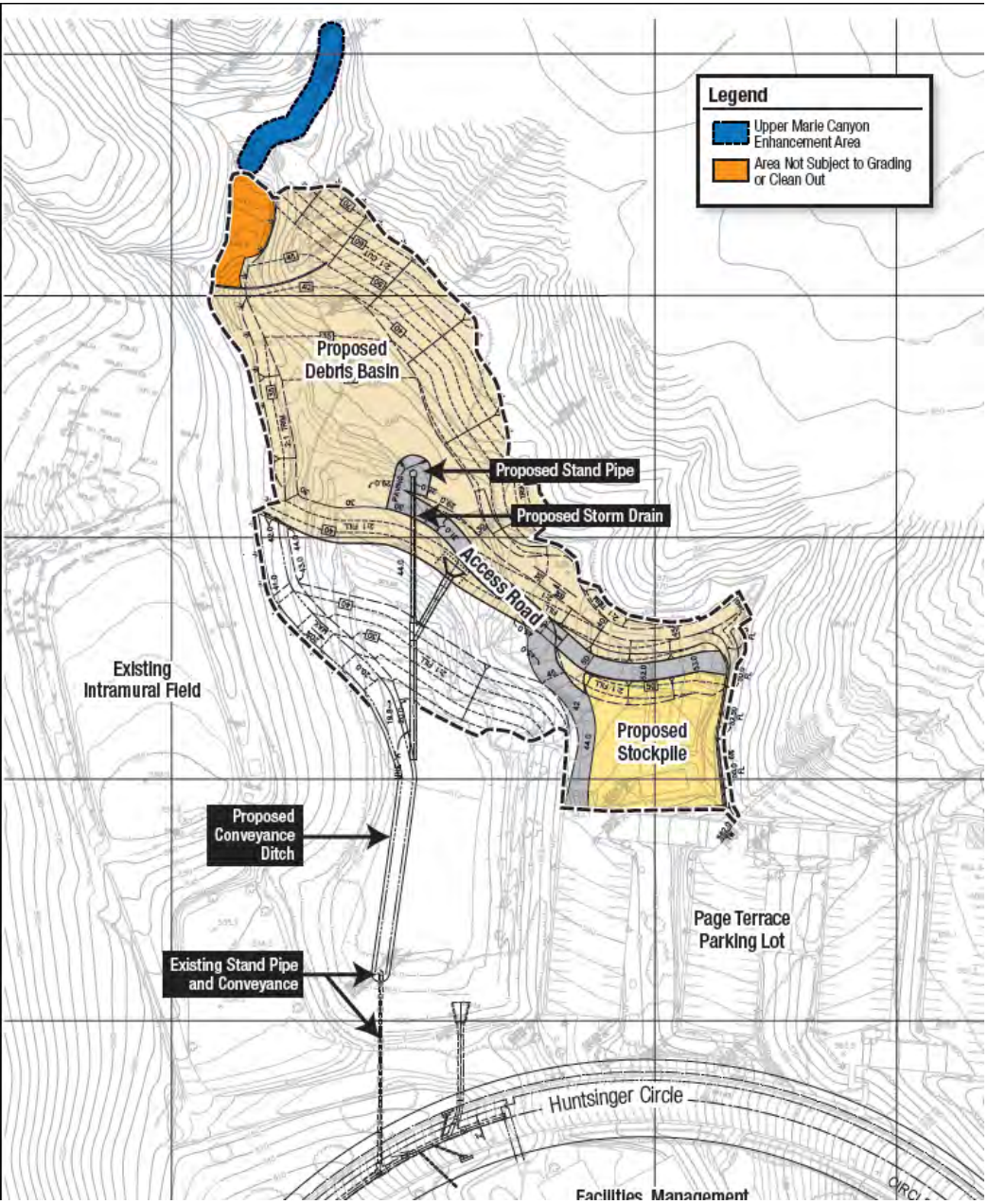
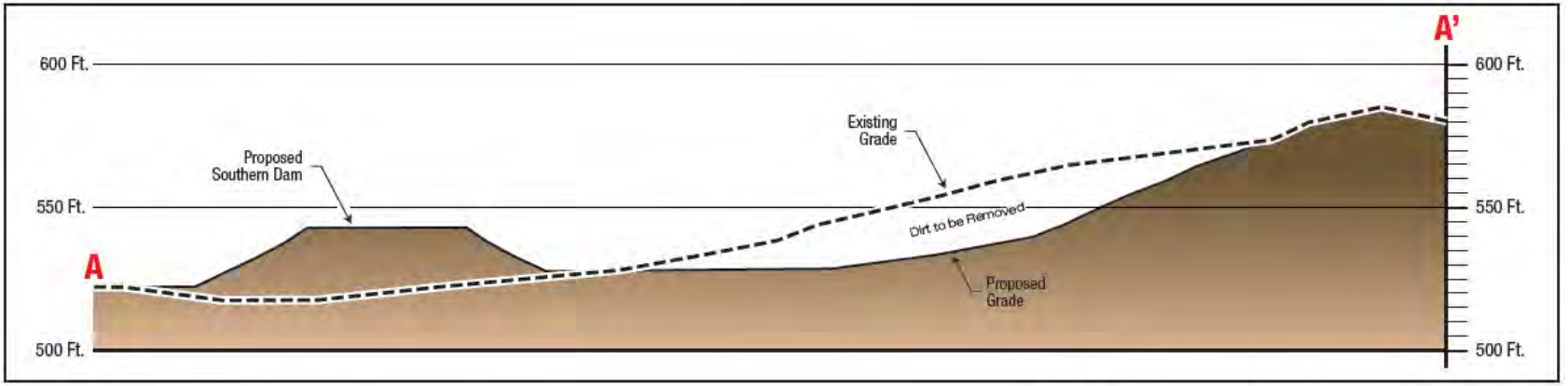
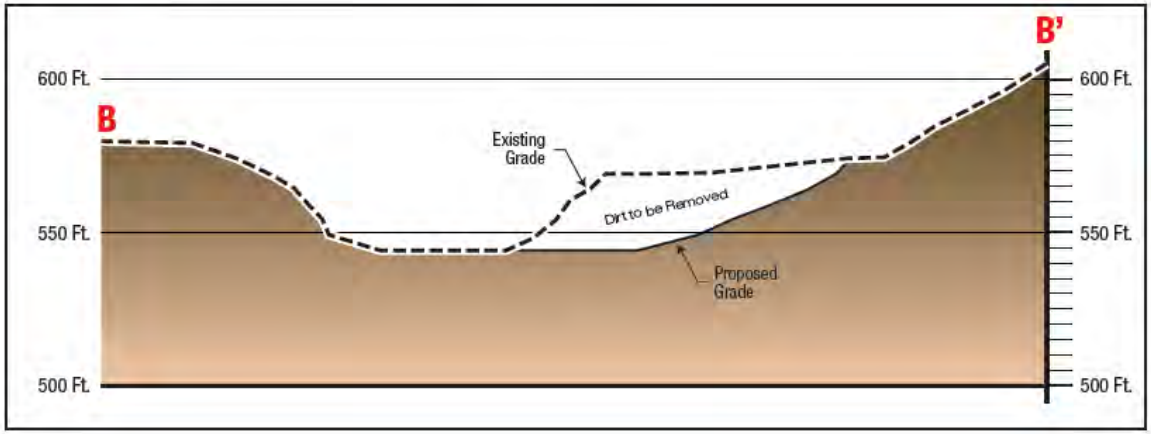
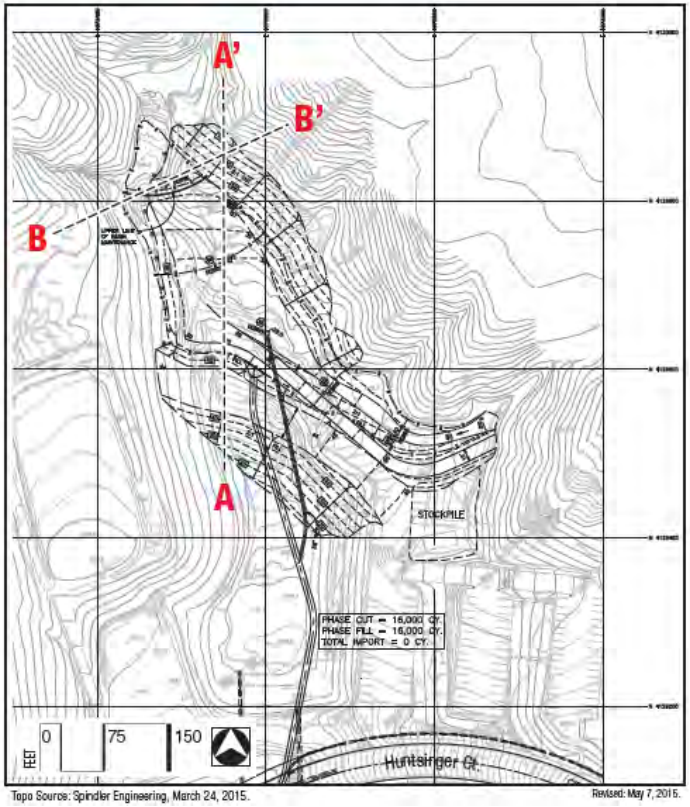


Exhibit 5
PEP-NOID-0004-15
Interim Drainage Conveyance Plan



Cross Sections for Proposed Debris Basin





Cross Sections Reference

Exhibit 6
PEP-NOID-0004-15
Debris Basin Cross Sections

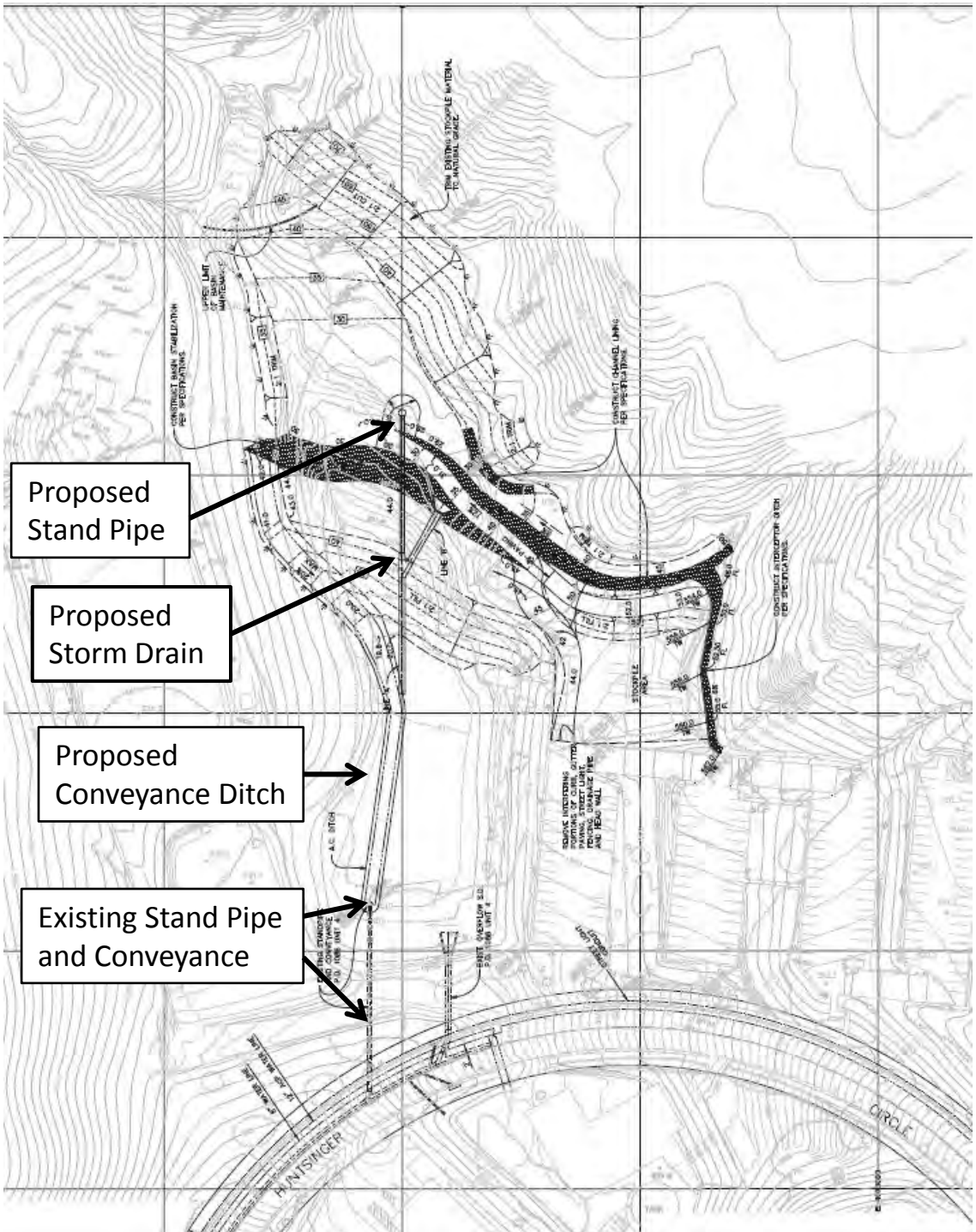
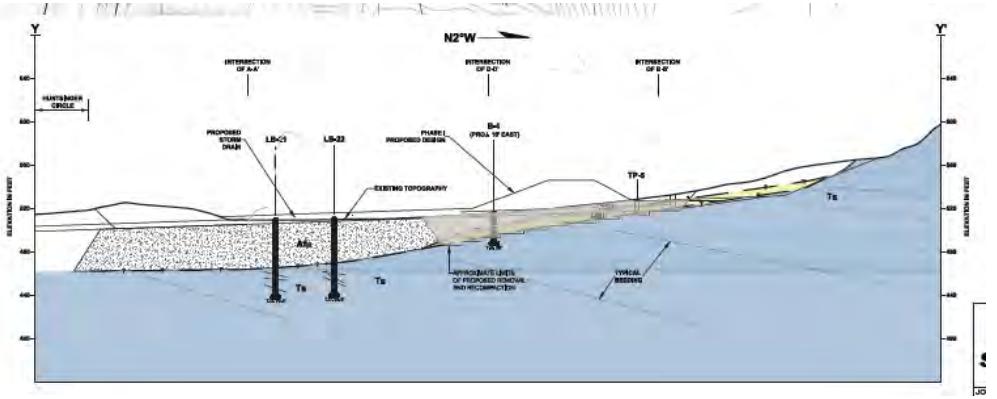


Exhibit 7
PEP-NOID-0004-15
Grading Plan



EXPLANATION

DEPTH OF REMEDIATION (ft)

- 0 - 10
- 10 - 20
- 20 - 30
- 30 - 40
- 40 - 50
- 50 - 60
- 60 - 70

N

HORIZONTAL AND VERTICAL
SCALE: 1 INCH = 100 FEET

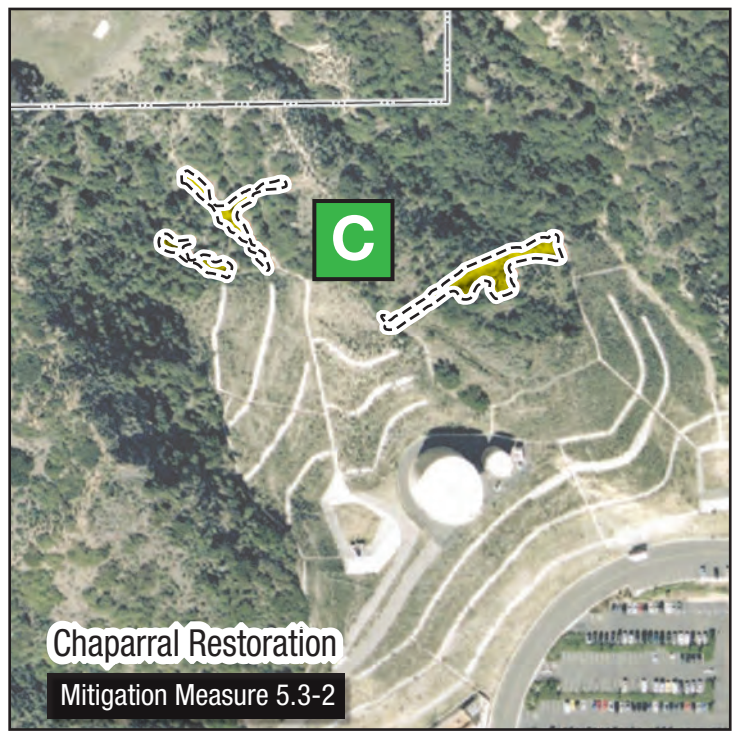
0 100 200
FEET

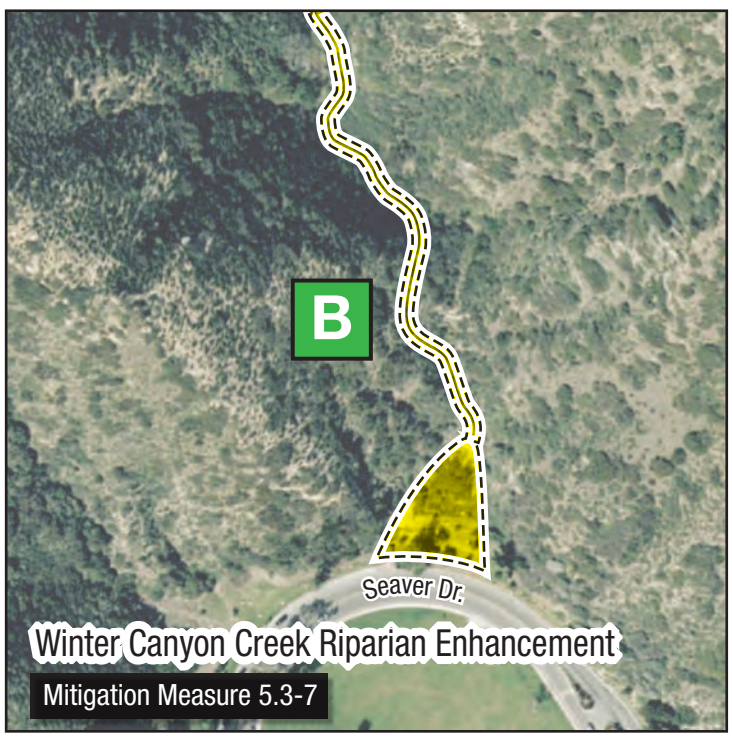
DEBRIS BASIN, EMBANKMENT REMEDIAL GRADING
REMOVAL MAP
PEPPERDINE UNIVERSITY
MALIBU, CA

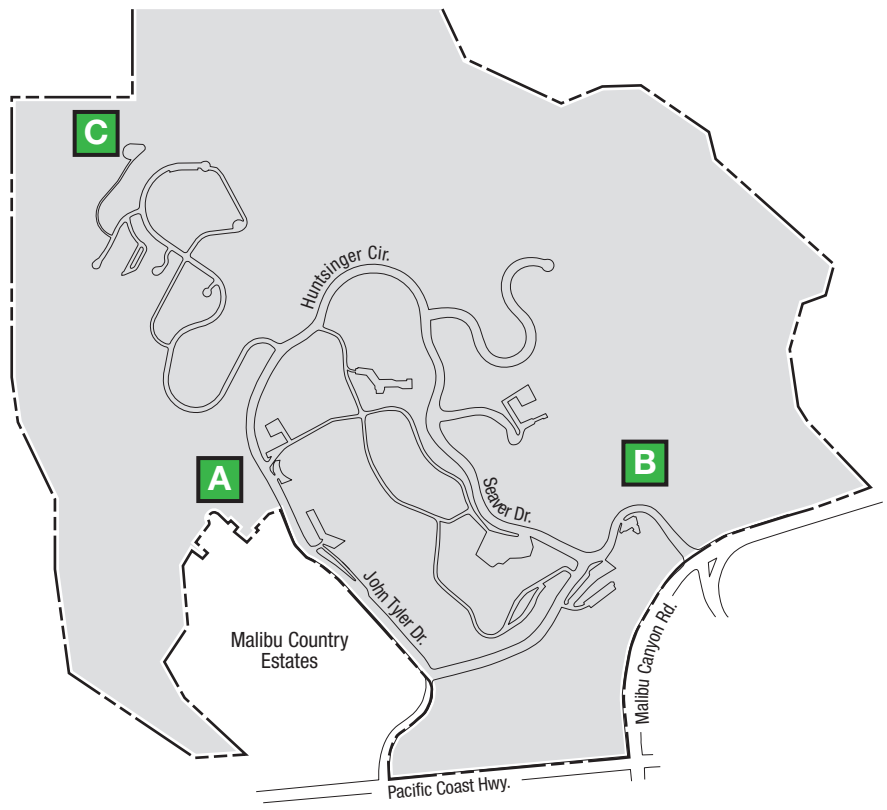
STONEY-MILLER CONSULTANTS, INC.

JOB NO.:	DATE:
12203-07	AUGUST 2015

Exhibit 8
PEP-NOID-0004-15
Removal & Re-compaction (Debris Basin Embankment)







Mitigation	Description	Location	Acreage	Ratio	Impact Mitigated
A **Spanish Broom Removal and Coastal Sage Scrub Restoration** **Mitigation Measure 5.3-8**	Removal of a Spanish broom infestation and restoration of the site to coastal sage scrub. At least a 0.41-acre portion of the mitigation site will be restored to California encelia scrub, which is considered to be a component of coastal sage scrub. Mitigation also involves the removal and control of dispersed Spanish broom within existing fuel modification zones on the slopes surrounding the restoration site, and the eradication or substantial reduction in cover and control of other invasive species at the restoration site.	On slopes just west of John Tyler Drive; generally west of the Tari Frahm Rokus Field (see Figure 5.3 of FEIR)	0.84	1:1	Removal of 0.84 acres of the re-vegetation site (ACOE mitigation site) on the western slope of the Marie Canyon debris basin within the grading limits of CLP Component 5. Also, removal of the sensitive California Encelia Alliance plant community.
B **Winter Canyon Creek Riparian Enhancement** **Mitigation Measure 5.3-7**	Removal of invasive species and planting of appropriate native species where invasive species have been removed within Army Corps of Engineers (ACOE) and Department of Fish and Game (DFG) jurisdictional areas in Winter Canyon. Invasive species to be targeted include, but are not limited to, pampas grass, Terracina spurge, sweet fennel, and umbrella sedge.	Winter Canyon drainage and debris basin to the north of Seaver Drive (see Figure 5.3-5 of FEIR).	0.48	1:1	Removal and filling of DFG jurisdictional habitat and ACOE non-wetland Waters of the U.S. within the grading limits of CLP Component 5.
C **Chaparral Restoration** **Mitigation Measure 5.3-2**	Restoration of disturbed areas to chaparral. Also involves eradication or substantial reduction in cover and the control of invasive plant species within these areas.	North of the water tank and re-vegetated manufactured slopes to the north of the Drescher Graduate Campus (see Figure 5.3-5 of FEIR).	0.29	1:1	Removal of upland native chaparral within the grading limits of CLP Component 5.

Proposed Mitigation Areas for Campus Life Project Impacts to Biological Resources

Exhibit 9
PEP-NOID-0004-15
Restoration Sites