

**CALIFORNIA COASTAL COMMISSION**

South Coast Area Office  
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TU 14c

Filed: March 9, 1998  
49th Day: April 27, 1998  
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Staff: SFR-LB  
Staff Report: March 19, 1998  
Hearing Date: April 7-10, 1998  
Commission Action:

**STAFF REPORT: REGULAR CALENDAR**

**APPLICATION NO.:** 5-97-420

**APPLICANT:** City of Newport Beach

**AGENT:** Gail Pickart

**PROJECT LOCATION:** 3531 Newport Boulevard and another parcel (APN #423-121-01) which is across the intersection to the north, City of Newport Beach, County of Orange

**PROJECT DESCRIPTION:** The demolition of an existing underground sewage pump station located in the intersection of Newport Boulevard and Via Lido. The construction of a new pump station located at 3531 Newport Boulevard which is approximately 200 feet to the south on the site of a former gas station. The new pump station will consist of a below grade structure for the pumps and wet well, and an above ground control structure. Additionally project includes the installation of new underground sewer lines. Grading for the pump station will consist of 2,800 cy of excavation and 1,750 cy of backfill with up to 1,050 cy of export. Weekday traffic lane closures on Newport Boulevard will be allowed from September 8, 1998 through March 31, 1999 except the period of December 17-23, 1998. The site of the new pump station and the parcel of land to the north will be landscaped as the Lido Village Gateway Park.

**SUMMARY OF STAFF RECOMMENDATION:** Staff recommends approval of the proposed project with five special conditions. The special condition require that the applicant: obtain the approval of the Orange County Health Agency, abide by the geotechnical recommendations, comply with the mitigation measures of the mitigated negative declaration, comply with the permit issued by the Orange County Sanitation Districts for the handling of waste water, identification of the disposal site for excavated material, and to abide by the CALTRANS permit regarding lane closures on Newport Boulevard.

**LOCAL APPROVALS RECEIVED:** Approval in Concept 2333-98 from the City of Newport Beach, Modification Permit 4601 from the City of Newport Beach, CALTRANS encroachment permit 1297-NUT-0791 as modified by rider 1297-NRW-0941, and Special Purpose Discharge Permit 5-84 by the County Sanitation Districts of Orange County.

**SUBSTANTIVE FILE DOCUMENTS:** City of Newport Beach certified Land Use Plan; Coastal Development Permits: 5-96-026 (City of Newport Beach), 5-97-023 (City of Newport Beach), 5-98-012 (City of Newport Beach), and 5-98-022 (City of Newport Beach); Mitigated Negative Declaration dated November 18, 1997 by the City of Newport Beach; the "Report of Geotechnical & Environmental Exploration - Lido Pump Station Relocation (5-41-1) Newport Boulevard, Newport Beach" by Converse Consultants; and Wastewater Discharge Regulations (Feb. 7, 1992) for the County Sanitation Districts of Orange County.

### **STAFF RECOMMENDATION:**

The staff recommends that the Commission adopt the following resolution:

#### **I. Approval with Conditions.**

The Commission hereby **GRANTS** a permit, subject to the conditions below, for the proposed development on the grounds that the development will be in conformity with the provisions of Chapter 3 of the California Coastal Act of 1976, will not prejudice the ability of the local government having jurisdiction over the area to prepare a Local Coastal Program conforming to the provisions of Chapter 3 of the Coastal Act, and will not have any significant adverse impacts on the environment within the meaning of the California Environmental Quality Act.

#### **II. Standard Conditions.**

1. Notice of Receipt and Acknowledgment. The permit is not valid and construction 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 construction has not commenced, the permit will expire two years from the date on which the Commission voted on the application, or in the case of administrative permits, the date on which

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the permit is reported to the Commission. Construction shall be pursued in a diligent manner and completed in a reasonable period of time. Application for extension of the permit must be made prior to the expiration date.

3. Compliance. All construction must occur in strict compliance with the proposal as set forth in the application for permit, subject to any special conditions set forth below. Any deviation from the approved plans must be reviewed and approved by the staff and may require Commission approval.
4. Interpretation. Any questions of intent or interpretation of any condition will be resolved by the Executive Director of the Commission.
5. Inspections. The Commission staff shall be allowed to inspect the site and the development during construction, subject to 24-hour advance notice.
6. Assignment. The permit may be assigned to any qualified person, provided assignee files with the Commission an affidavit accepting all terms and conditions of the permit.
7. Terms and Conditions Run with the Land. These terms and conditions shall be perpetual, and it is the intention of the Commission and the permittee to bind all future owners and possessors of the subject property to the terms and conditions.

### **III. Special Conditions.**

1. Approval from Orange County Health Agency

Prior to issuance of the coastal development permit, the applicant shall submit for the review and approval of the Executive Director, written documentation from the Orange County Health Agency that the proposed dewatering operation will resolve the agency's concern that off-site residents may be adversely affected by the hydrocarbon plume as stated in the agency's letter of October 15, 1996.

2. Newport Boulevard Traffic Lane Closures

To minimize adverse impacts on coastal access to the public resulting from the construction of the pump station, the applicant shall comply with the CALTRANS encroachment permit 1297-NUT-0791 as modified by rider 1297-NRW-0941 for the closing of any through traffic lanes on Newport Boulevard:

- a) No lane closures can occur until after Labor Day 1998.
- b) No traffic lane closures are authorized from December 17, 1998 through December 23, 1998.
- c) All work which interferes with public traffic shall be limited to the hours of 9:00 AM to 4:00 PM weekdays. The full width of the road shall be open for use by the public on Saturdays, Sundays, and designated legal holidays, after 4:00 PM on Fridays and on the day preceding designated legal holidays. At least one through traffic lane in either direction must be kept open at all times.

3. Conformance with Geotechnical Recommendations

Prior to issuance of the coastal development permit, the applicant shall submit for the review and approval of the Executive Director:

- a) final revised plans. These plans shall include the signed statement of the geotechnical consultant certifying that these plans incorporate the geotechnical recommendations contained in the geotechnical investigation of April 4, 1997 by Converse Consultants (Project 96-32441-011) for the County Sanitation Districts of Orange County into the final design of the proposed development.
- b) written confirmation of approval from the Orange County Health Care Agency for the vapor barrier designed for the subterranean portions of the control room and below ground pump stations.

The approved development shall be constructed in compliance with the final plans as approved by the Executive Director. Any deviations from the plans shall require a Coastal Commission approved amendment to this permit, or written concurrence from the Executive Director that the deviation is not substantial and therefore a permit amendment is not needed.

4. Conformance with Water Quality Standards

To assure that contaminants which could adversely affect water quality and human health will be properly managed and will not be discharged into coastal waters, the applicant shall adhere to the following requirements:

- a) The applicant shall comply with the mitigation requirements contained in the Negative Declaration for the Lido Pump Station prepared by the City of Newport Beach which is dated November 12, 1997.
- b) The applicant shall comply with the requirements of Special Purpose Discharge Permit No. 5-84 issued by the County Sanitation Districts of Orange County.
- c) The applicant shall not discharge groundwater into the storm drain system.

5. Disposal Site Identification

Prior to issuance of the coastal development permit, the applicant shall identify in writing, for the review and approval of the Executive Director, the location of the disposal site of the excavated soil resulting from the proposed project. Disposal shall occur at the approved disposal site. If the disposal site is located in the coastal zone a coastal development permit or an amendment to this permit shall be required before disposal can take place.

**IV. Findings and Declarations.**

The Commission hereby finds and declares as follows:

**A. Project Description and Location**

The City of Newport Beach proposes two principal activities under this permit. First is the replacement of an existing underground sewage pump station located in the intersection of Newport Boulevard and Via Lido with a new pump station to be located at 3531 Newport Boulevard on the site of a former gas station which is approximately 200 feet to the south (Exhibits 1-3). The pump station relocation project is being proposed because the pump station must be moved to facilitate construction of improvements to Newport Beach Boulevard which are currently underway.

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The new pump station will consist of a below grade structure for the pumps and wet well, and an above ground control structure (Exhibit 4 shows the location of the control structure). The existing underground pipes would also be relocated. Grading for the pump station will consist of 2,800 cy of excavation and 1,750 cy of backfill with up to 1,050 cy of export. Some of the material identified for export may be used to backfill the "old" pump station when it is decommissioned. The disposal site for any material which is actually exported off-site has not been identified.

The applicant proposes to comply with a CALTRANS permit which requires that lane closures on Newport Boulevard in support of the project can not occur prior to September 8, 1998. Lane closures which are allowed must be done on weekdays between the hours of 9:00 AM and 4:00 PM with one through lane (in each direction) kept open at all times. Additionally no lane closures can take place from December 17, 1998 through December 23, 1998.

The new facility will have the same capacity as the existing pump station. The new pump station will be underground with dimensions of about thirty feet by forty-two feet at a maximum depth of 15 feet below sea level or twenty feet below the existing grade. There will be three pumps (each 1750 gallons per minute) with a combined capacity of 3.91 million gallons per day (mgd). The above ground control room will be housed in a structure (16 feet wide by 38 feet long) which will contain the electrical and instrumentation equipment. The structure will be separated from the park by a screening wall (Exhibit 4). The new facility will comply with current OSHA requirements and will be designed to meet greater performance standards in terms of reliability, maintenance, and electronic controls.

The existing (old) pump station will be demolished. This will include salvaging the existing motors, pumps, valves, and electrical equipment; removing the upper portion of the existing station's structure; and abandoning the lower portion of the existing concrete structure in place. The pump station foundation will be perforated to facilitate groundwater drainage and then backfilled. The existing pumping station will continue in operation until the replacement station is in operation.

The second component of the project is the landscaping of the new pump station site plus another parcel immediately to the north (Exhibits 2,4 and 5). These two parcels will constitute the Lido Village Gateway Park. The site of the new pump station which is one of the parcels to be used as a park is currently owned by the City of Newport Beach (Exhibit 4). The second

parcel to the north (Exhibit 5) is owned by CALTRANS and ownership is being transferred to the City of Newport Beach. The parks located on these two parcels will be passive in nature for the purpose of providing visual enhancement to people entering and leaving Lido Isle when using Newport Boulevard. The two sites were formally occupied by gas stations and their development as landscaped parks will add 11,625 sq. ft. of open space.

The mitigated negative declaration for the project notes that the project site has a long history of use as a service station by the Chevron Oil Company. Chevron abandoned the site in 1991-1992 after an extensive effort to provide remediation of contaminated soils resulting from hydrocarbon leakage from the on-site gasoline storage tanks. Efforts to remediate the leaked hydrocarbons resulted in the removal of some 1400 cubic yards of contaminated soil. However, this effort was not considered satisfactory to the Orange County Health Care Agency with regard to the potential for volatilization of benzene from contaminated groundwater. The County of Orange Health Care Agency, in a letter dated October 15, 1996, stated "*Our primary concern is the calculated excess lifetime cancer risk due to exposure of off-site residents to benzene vapor from contaminated groundwater migrating through the soil and into the residences*" (Exhibit 7).

Consequently, the site may require additional site remediation. Chevron has signed an agreement to bear the cost of these efforts to the satisfaction of the City of Newport Beach which now owns the property and other regulatory agencies with jurisdiction.

#### **B. Public Access**

One of the strongest legislative mandates of the Coastal Access is the preservation of coastal access. Section 30211 of the Coastal Act mandates that development shall not interfere with the public's right of access to the sea. In this case, Newport Boulevard is a major arterial route used by the public to visit the coast. Newport Boulevard at the project location consists of two traffic lanes in each direction. The project proposes through traffic lane closures to facilitate the relocation of the pump station and associated underground pipes. The traffic lane closures will be done in phases with no more than one through traffic lane closed at any one time. These lane closures will temporarily reduce the capacity of Newport Boulevard in the construction zone and would therefore obstruct the public's ability to access the coast.

The City of Newport Beach receives an annual influx of visitors during the summer months. Rental housing occupancy increases during the summer, as does retail commercial activity particularly in the beach areas of the City which are frequented by out of town visitors. The immediate project vicinity

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experiences high vehicular and pedestrian traffic volumes during the summer months. However, because of Newport Beach's unique recreational opportunities, large harbor and marina facilities, and its coastal amenities, the City attracts people year round and maintains a generally strong commercial base as a result.

An unregulated closure of traffic lanes, especially during the summer months, would have an adverse impact on the public's ability to use Newport Boulevard to reach the recreational beaches and the sea. The peak summer season for visiting the coast is fifteen weeks long. The project applicant, to minimize, the adverse impact of the proposed lane closures on the public's ability to reach the coast does not propose any lane closures until after the peak summer season. The applicant has received a permit from CALTRANS for the proposed lane closures. Lane closures under the CALTRANS permit would be allowed weekdays from 9:00 AM to 4:00 PM beginning on September 8, 1998. No lane closures would be allowed on weekends or holidays. Moreover lane closures also would not be allowed from December 17, 1998 through December 23, 1998 for the Christmas Boat Parade.

Compliance with the CALTRANS permit would avoid significant impacts in the public's ability to utilize Newport Boulevard to access the coast. The weekday lane closures would be allowed from 9:00 AM to 4:00 PM. By 9:00 AM most commuters would have arrived at work and morning traffic tends to be lighter than afternoon traffic. The City of Newport Beach states that the intersection capacity utilization (ICU) for the intersection of Newport Boulevard and Via Lido for both the AM and PM peaks were within the definition of Level A service. Therefore, allowing the lane closures to begin at 9:00 AM would not have significant adverse affect on visitors when using Newport Boulevard to access the coast. Reopening the lane in the afternoon at 4:00 PM would restore the free flow of traffic. This would allow both beach goers and commuters in the late afternoon to use the road without the traffic flow being obstructed.

To assure that the lane closures are implemented as proposed to minimize adverse impacts to coastal access the Commission finds it necessary to impose a special condition for the applicant to comply with the CALTRANS encroachment permit (1297-NUT-0791 as modified by rider 1297-NRW-0941). Thus, as conditioned the Commission finds that the proposed development would be consistent with the public access policies of the Coastal Act.



C. Geotechnical

Section 30253 of the Coastal Act states, in relevant part:

*New development shall:*

- (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 proposed development involves the construction of a subterranean pump station on a site which has hydrocarbon contaminants and which also has a high groundwater level. Consequently, the pump station must be designed to withstand the adverse effects from hydrocarbon contaminants and the pressure of the water on the structure.

To evaluate the geotechnical issues raised by the proposed pump station relocation Converse Consultants prepared a geotechnical report which is dated April 4, 1997. The report concludes: *"Based on the results of our field and laboratory exploration, combined with engineering analysis and our experience and judgment, it is our professional opinion that the proposed pump station and associated pipelines may be constructed as planned."*

Though the report concludes that the project can be undertaken, the geotechnical consultants have made recommendations which must be complied with by the applicant to assure that the project will minimize risks to life and property, and will assure structural integrity. Recommendations made by the geotechnical consultants relate to: 1) dewatering of the site, 2) soil compaction, 3) necessity for a vapor barrier, 4) design specifications to resist the uplift pressure of groundwater on the underground structure, and 5) soil corrosivity. The geotechnical consultants conclude by stating that these recommendations must be incorporated in the final design drawings and project specifications to assure that the project will be constructed in a sound manner.

The geotechnical report also makes a recommendation for the installation of a vapor barrier to prevent the possibility of hydrocarbon vapors from migrating into and accumulating within the proposed underground structure. This includes a recommendation by the geotechnical consultants that the Orange County Health Care Agency review and approve the vapor barrier

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design. In terms of the vapor barrier design, the mitigated negative declaration states that: *"The final plans will be submitted to the Orange County Health Care Agency for their review and approval."* (Note: this is a separate issue from the concern of the Orange County Health Agency in their letter of October 15, 1996. This concern relates only the design of the subterranean structures.)

To ensure that the geotechnical consultants' recommendations are instituted, it is necessary to impose a special condition requiring compliance of the project plans with the recommendations made by the geotechnical consultants. Accordingly, the applicant must submit, for the review and approval of the Executive Director, plans signed by a certified geotechnical engineer which incorporates the recommendations made by Converse Consultants in their April 4, 1997 geotechnical investigation for the Lido Pump Station. Additionally, the applicant must submit written confirmation from the Orange County Health Care Agency that the vapor barrier design has been approved by that agency.

The location of the disposal site for the excavated material which will be removed from the proposed pump station was not identified in the project application. The location of the disposal site must be identified in order to evaluate the impact of the material disposed on coastal resources if the disposal site is in the coastal zone. In this case there is the potential that the excavated material may be contaminated even though the site was previously remediated. In order to assure that the excavated material is disposed of properly, the disposal site must be identified, for the review and approval of the Executive Director. Further, the special conditions contained in the mitigated declaration for the project (Exhibit 6) must be complied with to assure that if any contaminated materials are encountered that they be disposed of in an appropriate manner. As a condition of approval, the applicant shall submit in writing, for the review and approval of the Executive Director, the location of the disposal site.

Therefore, the Commission finds that the proposed project, as conditioned, for conformance with the geotechnical recommendations and identification of the disposal site would be consistent with Section 30253 of the Coastal Act regarding hazards.

**D. Water Quality**

Section 30231 of the Coastal Act states:

*The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine*

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*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.*

Additionally Section 30232 of the Coastal Act states:

*Protection against the spillage of crude oil, gas, petroleum products, or hazardous substances shall be provided in relation to any development or transportation of such materials. Effective containment and cleanup facilities and procedures shall be provided for accidental spills that do occur.*

The geotechnical section above, identified that the new pump station has two major concerns related to water quality. First, the project site has a high water table and second it contains hydrocarbon contaminants. Consequently the site must be dewatered for construction to take place. However, the water generated by the dewatering operation must comply with water quality regulations to assure that the project will not have an adverse impact on coastal waters will provide site remediation, and will protect human health.

In this case unregulated groundwater discharges could enter Newport Harbor because of the harbor's proximity to the project site. Newport Harbor (Lower Newport Bay) is a critical coastal water body on the Federal Clean Water Act 303(d) list of "impaired" water bodies. The designation as "impaired" means the quality of the water body cannot support beneficial recreation and aquatic uses. The listing is from the California Regional Water Quality Control Board, Santa Ana Region, and the State Water Resources Control Board, and endorsed by the U.S. Environmental Protection Agency. Further, the California Regional Water Quality Control Board has targeted the Newport Bay watershed, which would include Newport Harbor, for increased scrutiny as a higher priority watershed under its new Watershed Initiative.

Under normal construction operations involving dewatering of a construction site, groundwater contamination can result from suspension of sediments and construction materials such as grease, motor oil, and heavy metals. These contaminants can usually be managed through the use of Best Management Practices under a permit issued by the Regional Water Quality Control Board. However, in this case the site was previously used as a gas station. The gas station tanks leaked and hydrocarbon contaminants were discharged into the groundwater. Though the site was partially remediated, the hydrocarbon contaminants were not totally expunged.

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The geotechnical consultants identified two methods of disposal for the water generated by the dewatering operation. The first was into the storm drain system. The second was into the sanitary sewer system. The geotechnical consultants noted that the discharged water would not comply with water quality criteria established by the Regional Water Quality Control Board without on-site treatment before disposal. In terms of the discharging into the sanitary sewer system the geotechnical consultants also identified the requirement for some pre-treatment prior to disposal.

The mitigated negative declaration that was prepared for the project in relation to a storm drain discharge stated that: *"The extracted groundwater will contain petroleum hydrocarbons at concentrations exceeding (0.100 ppm) which will exceed the specified discharge limits for direct discharge to the local drain system."* The mitigated negative declaration went on to state (for disposal into the sewer collection system) that: *"Discharge limits to be met will include a 100 ppm limit for oil and grease and a 0.580 ppm limit for total toxic organics. For disposal to the sewer collection system, a compliance sampling and analysis program will be required to ensure treatment is adequate and that compliance with CSDOC discharge limits are demonstrated. Such a plan has been approved by the Sanitation Districts."*

The applicant has elected to use the sanitary sewer system for the disposal of the water generated by the dewatering operation. The County Sanitation Districts of Orange County has issued a Special Purpose Discharge Permit No. 5-84 for this dewatering operation. The specific method of on-site remediation has not yet been selected by the applicant to bring contaminated groundwater into compliance for discharge into the sanitary sewer system. One possible treatment process is the use of "granular activated carbon" which absorbs the hydrocarbons.

The County of Orange Health Care Agency in a letter dated October 15, 1996 raised a concern about possible migration of hydrocarbons off-site which could adversely affect nearby residents (Exhibit 7). The Health Care Agency was initially concerned that watering of the parks would result in percolating water that would push the hydrocarbon plume off-site. This letter was prepared prior to the proposed dewatering operation.

The geotechnical report notes that *"Dewatering of the site will lower the groundwater level some distance beyond the proposed construction area, depending on the dewatering methods used and the predominating soil types."* In its permit for the proposed dewatering, the County Sanitation Districts of Orange County stated: *"Construction will entail deep excavation and site dewatering which will generate groundwater between 200,000 gallons to 400,000 gallons per day."*

Consequently, the dewatering operation (with on-site remediation) is expected to reduce the potential for offsite migration by collapsing the hydrocarbon plume. Basically, as the contaminated water is removed from the ground, hydrostatic pressure will result in the flow of uncontaminated groundwater towards the construction site. The uncontaminated water flowing towards the center of the site will also push contaminated water towards the dewatering location. The hydrocarbon plume will be expected to be reduced in size and extent. Additionally, Converse Consultants in a letter (Exhibit 10) dated March 18, 1998 concluded that the concentration of gasoline constituents in the groundwater has decreased significantly since 1996 and that the remediated soils no longer leach hydrocarbons into the water column. Therefore, the potential for off-site migration of the contaminated water would be significantly reduced.

Though the dewatering operation is expected to have a beneficial impact, the dewatering operation has not been reviewed by the Orange County Health Agency. Consequently, it is unknown if the proposed dewatering will address the concerns raised by the Orange County Health Agency in their letter (Exhibit 7) of October 15, 1996 concerning adverse impacts of the hydrocarbon plume to nearby residents.

To assure that the groundwater containing hydrocarbons does not adversely affect biological productivity, the quality of coastal waters, protects human health, and provides effective containment and clean-up the Commission finds it necessary to impose special conditions. First, the special conditions contained in the Mitigated Negative Declaration (Exhibit 6) for the Lido Sewage Pump Station Replacement and Gateway Parks Landscaping shall be implemented. Second, the applicant shall comply with the requirements of Special Purpose Discharge Permit No. 5-84 issued by the County Sanitation Districts of Orange County and that groundwater. Third, the applicant shall submit written documentation from the Orange County Health Agency that the proposed dewatering operation resolves the concern raised by that agency in their letter of October 15, 1996. Fourth, that groundwater not be discharged into the storm drain system. Therefore, only as conditioned can the Commission find the proposed development to be consistent with Section 30231 of the Coastal Act regarding water quality and the protection of human health, and Section 30232 of the Coastal Act regarding the effective containment and cleanup of hydrocarbon products.

**E. Local Coastal Program**

Section 30604(a) of the Coastal Act provides that the Commission shall issue a Coastal Development Permit only if the project will not prejudice the

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ability of the local government having jurisdiction to prepare a Local Coastal Program which conforms with the Chapter 3 policies of the Coastal Act.

The Newport Beach Land Use Plan was certified on May 19, 1982. The project as conditioned is consistent with the Chapter 3 policies of the Coastal Act. The proposed development will not prejudice the City's ability to prepare a Local Coastal Program for Newport Beach that is consistent with the Chapter 3 policies of the Coastal Act as required by Section 30604(a).

**F. California Environmental Quality Act**

Section 13096(a) of the Commission's administrative regulations requires Commission approval of Coastal Development Permit applications to be supported by a finding showing the application, as conditioned by any conditions of approval, to be 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 feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse effect which the activity may have on the environment.

The project is located in an existing urbanized area. Urban development already exists on the subject site which is in and immediately adjacent to Newport Beach Boulevard which is a major arterial road. The subject site was formerly a gas station and the proposed improvements include the creation of landscaped open space. The proposed development has been conditioned to assure that the project will not have a significant adverse impact on coastal access, human health, water quality, and requiring conformance with geotechnical recommendations. The project has been conditioned: for the submission of documentation that the dewatering operation be approved by the Orange County Health Agency, to comply with a CALTRANS permit regarding traffic lane closures, identification of the disposal site, to comply with the mitigation requirements of the mitigated negative declaration for the project, and to comply with the requirements of a discharge permit issued by the Orange County Sanitation Districts. The proposed development is consistent with the Chapter 3 policies of the Coastal Act. The project as proposed is the least environmentally damaging alternative. Therefore, the Commission finds that the proposed project is consistent with CEQA and the policies of the Coastal Act.



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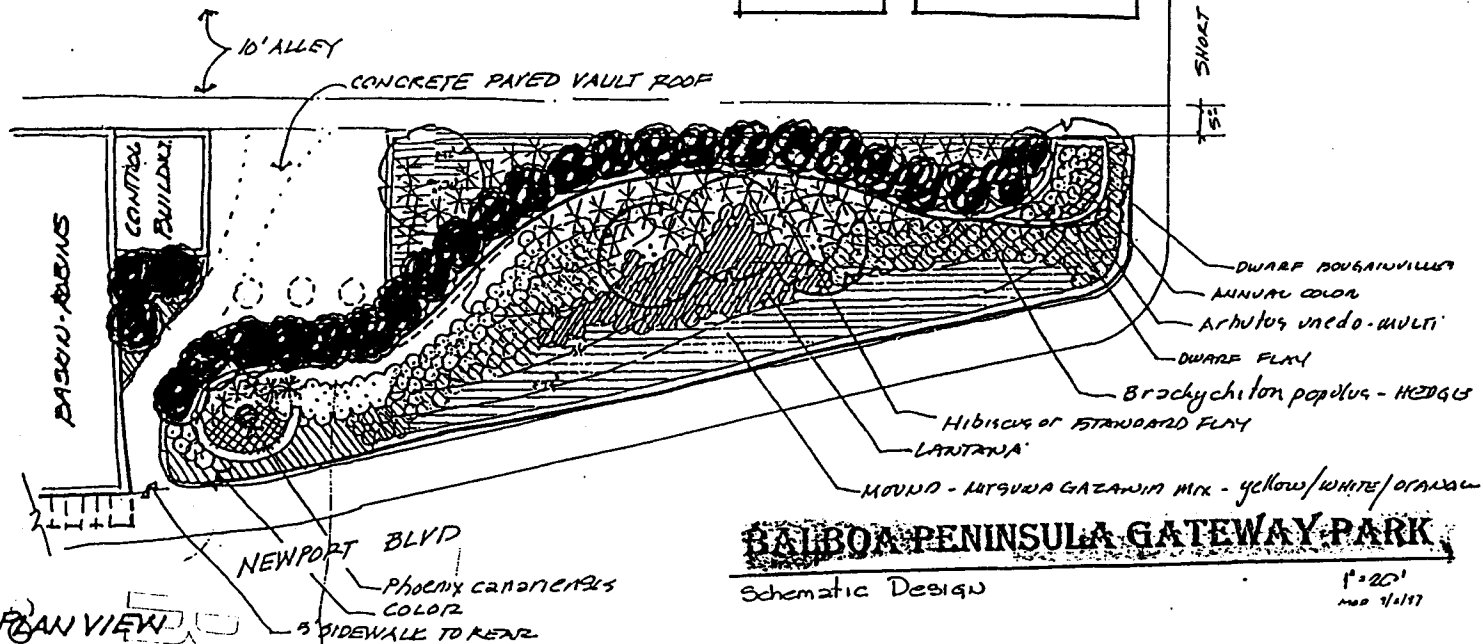
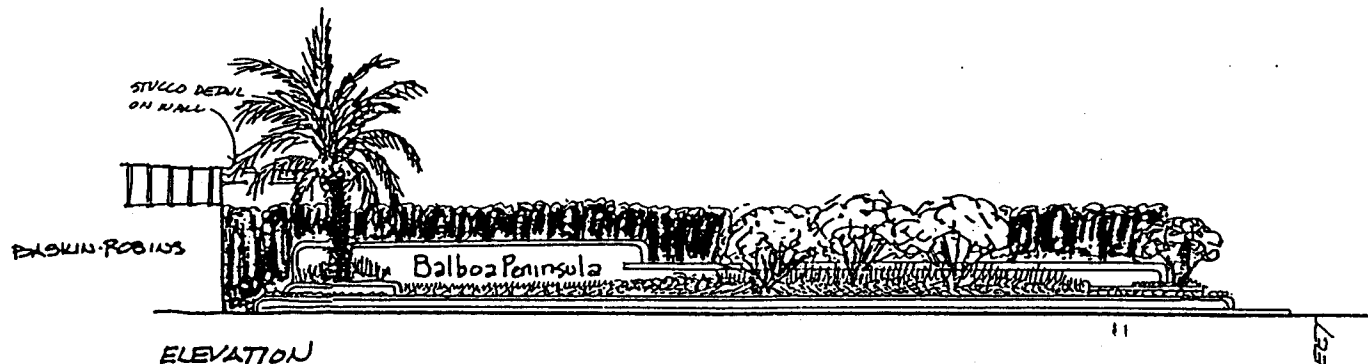
PROJECT  
SITE

**California Coastal  
Commission**

## PROJECT LOCATION MAP







	<b>EXHIBIT No. 4</b>
	Application Number:
	<b>5-97-420</b>
	<b>Landscape Plan</b>
California Coastal Commission	

RECEIVED  
SEP 3 1997

**Landscape Architects**  
3622 CAMPUS DRIVE, SUITE 120 NEWPORT BEACH, CA 92660  
LICENSE NO. 2314 714-756-0150

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CALIFORNIA  
COASTAL COMMISSION

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**MITIGATION MEASURES TO BE IMPLEMENTED**

for

**LIDO SEWAGE PUMP STATION REPLACEMENT AND  
GATEWAY PARKS LANDSCAPING**

1. Any groundwater contaminated with hydrocarbons that is removed during dewatering operations associated with the excavations for the underground portion of the pump station and pipelines shall be handled as follows:
  - a) Removed from the site and delivered to an appropriate treatment facility for disposal, or
  - b) Provide onsite treatment of the groundwater reducing the contamination to a level so that the effluent can be discharged into the sanitary sewer system along with payment of corresponding volumetric charges, or
  - c) Provide onsite treatment of the groundwater reducing the contamination to a level so that the effluent can be discharged into storm drainage systems which empty directly into the Newport Bay.
2. If soil removed during excavation operations is found to be contaminated with hydrocarbons, such material shall be removed from the site and delivered to a landfill designated to receive such contaminated soil or to a treatment facility equipped to remediate such contaminated soil.
3. Construct the finish floor of the Pump Station Control Building at an elevation above the established flood plain level for the area.
4. The exterior of the Pump Station Control Building shall have a stucco finish and color compatible with nearby structures so that the new building blends in with the surrounding community.
5. Subterranean portions of the pump station shall be sealed so as to prevent the escape of noxious odors offensive to adjoining properties. Similarly, vapor barriers shall be installed so as to prevent possible migration of gasoline vapors from accumulating within the structures.
6. Noise and/or vibration associated with installing sheet piling for excavation may require the use of sound attenuation measures such as muffling blankets and the placement of vibration monitors to measure earth movement. If noise or settlement and vibration is excessive, work will be stopped and alternative construction techniques implemented.
7. Provide environmental protection plan to control impacts pertaining to water, air and noise pollution.

**COUNTY OF ORANGE  
HEALTH CARE AGENCY****PUBLIC HEALTH  
DIVISION OF ENVIRONMENTAL HEALTH****TOM URAM**  
DIRECTOR**HUGH F. STALLWORTH, M.D.**  
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October 15, 1996

Robert Plummer  
Chevron U.S.A., Inc.  
P.O. Box 2833  
La Habra, CA 90631

Subject: Corrective Action Project

Re: Former Chevron Facility #9-7100  
3531 Newport Blvd.  
Newport Beach, CA  
O.C.H.C.A. Case #85UT10**EXHIBIT No. 7**

Application Number:

**5-97-420****County Letter**California Coastal  
Commission

Dear Mr. Plummer:

This Agency has evaluated the cleanup project that has been conducted at this site to remediate the effects of the unauthorized releases of gasoline which had occurred. The data obtained from groundwater monitoring and water sample analyses has been reviewed.

With the current information we have concerning the site conditions and using Environmental Health's vapor risk model, the groundwater concentrations currently present under the subject site do not pass our vapor risk analysis, and therefore do not make this site a candidate for closure at this time. Our primary concern is the calculated excess lifetime cancer risk due to exposure of off-site residents to benzene vapor from contaminated groundwater migrating through the soil and into the residences. The off-site residences of concern consist of several ground floor apartments to the west of the site.

In calculating the risk to off-site residents, the most recent benzene concentrations in groundwater were used. A groundwater monitoring well, MW-15, located approximately 15 feet from the residences has a concentration of 88 parts per billion (ppb) benzene. This concentration has been increasing since it was first sampled approximately one year ago. A worst-case well, MW-7, located in the center of the plume in the northern portion of the site has detected an average concentration of 180 ppb benzene over the last one and one half years. The most recent benzene concentration detected in MW-7 was 340 ppb benzene. Since the proposed use of the subject site is to be a greenbelt, it will be continually watered to keep it green. This water can be expected to push the contaminant plume away from the site, and in the direction of the residences. We therefore believe that the use of the worst-case concentration of detected benzene for the vapor risk model is prudent.

Plummer

2

October 15, 1996

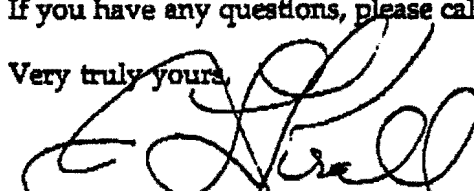
We have ran our vapor risk model for both groundwater concentrations scenarios, from the worst-case well and the well next to the residences, and both analyses have failed. With the use of the 340 ppb benzene concentration, the model fails our acceptable risk factor with a risk of approximately  $1.5E-5$ , or fifteen people out of one million who would develop cancer as a result of increased exposure to benzene vapors, versus the one in a million risk ( $1E-6$ ) which the Department of Toxics Substances Control currently uses as a cutoff for an acceptable risk rate. In the consultant's March 6, 1996 risk assessment report, the consultant ran several iterations of a vapor risk model. When values similar to those we use in our model were used, the model failed. However, when several parameters were modified (which we believe were not conservative enough) the model barely passed ( $1E-6$ ).

If the responsible party wants to appeal the vapor risk analysis by providing actual soil gas data, a soil vapor survey to achieve more realistic input values in lieu of groundwater data could be conducted. This may not be successful due to the shallow depth the groundwater (approximately 4 feet) and potential for pulling ambient air into the vapor probe which may already be in excess of allowable limits. Successful sampling leading to an acceptable vapor risk would lead to site closure.

At this time, groundwater monitoring is to resume. Should further data collection fail to show an acceptable level of risk, the present groundwater contamination residual concentration will have to be remediated to non-threatening levels. Natural attenuation is one possible remedial alternative. Enhancing the in-situ bioremediation processes through the use of oxygen releasing compounds or similar technologies are options that also could be considered. The feasibility and cost effectiveness of all alternatives for this site must be evaluated. The selected remedial plan is to be approved by this Agency prior to implementation.

If you have any questions, please call me at (714) 667-3714.

Very truly yours,



Joyce L. Krall, REHS  
Hazardous Waste Specialist  
Hazardous Materials Management Section  
Environmental Health Division

JLK

cc: Patricia Hannon, Santa Ana Regional Water Quality Control Board  
Steve Bunting, Newport Beach Fire Department  
Barbara Schinnerer, property owner  
Peggy Ducey, Assistant to City Manager, City of Newport Beach



# COUNTY SANITATION DISTRICTS OF ORANGE COUNTY, CALIFORNIA

March 2, 1998

phone:

(714) 962-2411

mailing address:

P.O. Box 8127  
Fountain Valley, CA  
92728-8127

street address:

10844 Ellis Avenue  
Fountain Valley, CA  
92708-7018

Mr. Steve Rynas  
California Coastal Commission  
South Coast Area Office  
200 Ocean Gate, 10<sup>th</sup> Floor  
Long Beach, CA 90802-4302

**EXHIBIT No. 8**

Application Number:

**5-97-420**

**CSDOC Letter**



California Coastal  
Commission

**SUBJECT:** Coastal Development Permit Application 5-97-420;  
Lido Sewage Pump Station Replacement and Gateway  
Parks Landscaping, CSDOC Contract No. 5-41-1

**Member  
Agencies**

**Cities**

Anaheim  
Brea  
Buena Park  
Cypress  
Fountain Valley  
Fullerton  
Huntington Beach  
Irvine  
La Habra  
La Palma  
Los Alamitos  
Newport Beach  
Orange  
Placentia  
Santa Ana  
Seal Beach  
Stanton  
Tustin  
Villa Park  
Yorba Linda

**County of Orange**

**Sanitary Districts**

Costa Mesa  
Garden Grove  
Midway City

**Water Districts**

Irvine Ranch

The letter is written to you at the request of the City of Newport Beach (City) regarding the disposal of groundwater generated from dewatering operations during the subject project. The City is the property owner in fee and is the overall coordinator for the environmental compliance and coastal development permit for this site.

County Sanitation District No. 5 (CSD5) has included provisions in subject contract technical specification section 2201 Earthwork, Article 3.02, Paragraph 3, "Dewatering" which sets the requirements for the project. CSD5 will allow discharge of groundwater into our sanitary sewer in accordance with CSD5 Wastewater Discharge Regulations. CSD5 will issue the contractor a Special Purpose Discharge Permit in accordance with Section 305 of said CSD5 Regulations. The contractor will be required to analyze the groundwater prior to discharge for all constituents contained in the most current Environmental Protection Agency "Priority Pollutant" list, excluding asbestos. Pollutants that exist at levels above the local ordinance will require treatment by appropriate methods on-site prior to discharge into the CSD5 sanitary sewer. Treatment systems, if required, will be designed and constructed under a contract change order and are subject to reimbursement by Chevron U.S.A. Inc. under an existing Environmental Agreement dated February 17, 1997 between the City, Chevron U.S.A. Inc. and the previous owners of the property.

The contractor has the option to discharge to a local storm drain under the CSD5 NPDES Permit Number CA9998001. This alternative is cost prohibitive and unlikely considering the more stringent conditions of the permit.

CSD5 anticipates that the above information will aid in completion of the Coastal Development Permit and be sufficient for the permit approval at the



Steve Rynas  
Page 2  
March 2, 1998

April Coastal Commission Meeting in Long Beach, California. CSD5 had awarded a Construction Contract for the Lido Sewage Pump Station Replacement to Advanco Constructors. CSD5 is awaiting the coastal development permit approval prior to issuance of the Notice-to-Proceed. The schedule of the project directly affects a major transportation improvement project of State Route 55 (Newport Boulevard) in the City of Newport Beach. Any delay in the award of this project will adversely impact the completion of the City project.

If you would like to discuss this further, please call me at your convenience.

David A. Ludwin, P.E.  
Director of Engineering

DAL:BDB:jam  
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# COUNTY SANITATION DISTRICTS OF ORANGE COUNTY, CALIFORNIA

**EXHIBIT No. 9**

Application Number:

**5-97-420**

**CSDOC Permit 5-84**



California Coastal  
Commission

March 11, 1998

phone:

(714) 962-2411

mailing address:

P.O. Box 8127

Fountain Valley, CA

92728-8127

street address:

10844 Ellis Avenue

Fountain Valley, CA

92708-7018

Jim Pieri, Superintendent

Advanco Constructors Division of Zurn Construction

P. O. Box 1219

Upland, CA 91786

**SUBJECT: Issuance of Special Purpose Discharge Permit**

**Re: Permit No. 5-84**

**Member  
Agencies**

**Cities**

Anaheim

Brea

Buena Park

Cypress

Fountain Valley

Fullerton

Huntington Beach

Irvine

La Habra

La Palma

Los Alamitos

Newport Beach

Orange

Placentia

Santa Ana

Seal Beach

Stanton

Tustin

Villa Park

Yorba Linda

County of Orange

Sanitary Districts

Costa Mesa

Garden Grove

Midway City

Water Districts

Irvine Ranch

Enclosed is the Special Purpose Discharge Permit No. 5-84 issued by the County Sanitation Districts of Orange County (Districts) to Advanco Constructors Division of Zurn Construction (Advanco) for the discharge of ground water generated at 3531 Newport Blvd., Newport Beach. Advanco is the construction contractor who is awarded Contract No. 5-41-1 by County Sanitation District of Orange County No.5 (CSD5) to construct a pump station (Lido Pump Station) at the above mentioned location in Newport Beach. Construction will entail deep excavation and site dewatering which will generate groundwater between 200,000 gallons to 400,000 gallons per day. In accordance to Addendum No. 2, Contract No. 5-41-1, the Districts will not charge any sewer or user fees to CSD5 for such discharge. However, Advanco is required to comply with all limits and conditions set forth in this permit, including the following:

## **Monitoring Analytical Testing:**

To assure compliance with the Districts' limit on total toxic organics (TTO) of 0.58 mg/L, Advanco will conduct monthly sampling of the pretreated groundwater effluent generated from dewatering and test for TTO using EPA test method 624. The sampling will be conducted according to the guidelines set in Attachment A.

## **Discharge Volume:**

Advanco shall calibrate, install, and maintain a flow-measuring device in accordance with the guidelines in Attachment B.

## **Reporting:**

The monitoring and discharge volume reports should be submitted using the monthly self-monitoring forms which will be mailed to you.



Jim Pieri, Advanco Constructors

Page 2

March 11, 1998

If there are any discrepancies in the permit information, please notify the Districts in writing. Advanco is also required to notify the Districts in writing of any changes relating to facility information, waste/wastewater quantity, or any other relevant information.

If you have any questions, please telephone Sejal Patel at (714) 593-7432.

  
Adriana Renescu, P.E.  
Permit and Enforcement Supervisor

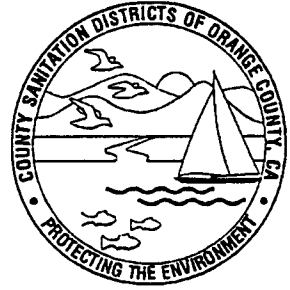
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Enclosures

Certified Mail P 287 699 361

COUNTY SANITATION DISTRICTS OF ORANGE COUNTY, CALIFORNIA  
SOURCE CONTROL DIVISION  
10844 Ellis Avenue  
P.O. Box 8127  
Fountain Valley, CA 92728-8127  
Telephones: (714) 962-2411 / 540-2910  
Fax: 962-6957



## SPECIAL PURPOSE DISCHARGE PERMIT

PERMIT NO. 5-84  
FOR DISCHARGE TO THE SEWER SYSTEM  
ISSUED BY  
COUNTY SANITATION DISTRICT NO. 5  
TO

NAME Advanco Constructors Division of Zurn Construction			
COMPANY ADDRESS P.O. Box 1210 Upland, CA 91786			
CONNECTION ADDRESS 3531 Newport Blvd. Newport Beach, CA 92658		PHONE (909) 982-8803	EFFECTIVE DATE March 10, 1998
LOCAL SEWERING AGENCY City of Newport Beach	PERMIT FEE \$250.00	S.I.C. NUMBER N/A	EXPIRATION DATE March 9, 1999

### SPECIFIC CONDITIONS OR REQUIREMENTS

ANALYSIS REQUIREMENTS Total toxic organics (EPA 624)
PRETREATMENT REQUIREMENTS Remove total toxic organics from the effluent utilizing carbon adsorption or equivalent to meet the Districts' TTO limit of 0.58mg/L at all times.
OTHER CONDITIONS <ol style="list-style-type: none"><li>1. Permittee is required to provide accurate flow data by measuring the pumping rate and duration of discharge - see Attachment A.</li><li>2. Permittee is required to obtain effluent samples and analyze for total toxic organics (EPA 624) on a monthly basis in accordance with Attachment B.</li><li>3. Permittee is required to adhere to all other conditions in accordance with Attachment C.</li></ol>
PERMITTEE IS REQUIRED TO COMPLY WITH ALL REGULATIONS AND DISCHARGE LIMITS IN THE DISTRICT'S WASTEWATER DISCHARGE REGULATIONS.

The named party is hereby granted permission to temporarily discharge into the sewerage facilities of the County Sanitation Districts of Orange County. Failure to comply with the conditions of this permit or District's *Wastewater Discharge Regulations* (Ordinance) will result in the immediate revocation of this permit and termination of discharge to the sewer system.

Fees, charges, requirements, limitations, or conditions imposed by this permit on the discharge are as listed above and as found on any additional attached pages.

AUTHORIZED COUNTY SANITATION DISTRICTS OF ORANGE COUNTY OFFICIAL

Mahin Talebi  
NAME

Source Control Manager  
TITLE

SIGNATURE

## ATTACHMENT A

### ADVANCO CONTRACTORS DIVISION OF ZURN CONSTRUCTION PERMIT NO. 5-84

#### EFFLUENT FLOW METER AND FLOW DATA REQUIREMENTS

Permittee shall report actual effluent flow meter readings to the Districts on a **monthly** basis.

To ensure proper operation and continued accuracy of the pretreated groundwater effluent discharge measurement, the flow monitoring system must be calibrated at least once per year. The calibration report must be submitted to the Districts with the regular report for the month in which the calibration is performed. The following information must be provided in the calibration report:

1. **Flow Monitoring System Description:** Provide a brief description of the system and all separate components.
2. **Contact Closure Frequency:** State the normal setting for the number of gallons of wastewater discharged between sampling contact closures and the variation range for systems with variable counters.
3. **Calibration Results:** The system must be tested at a minimum of three (3) different known flow rates. The flow rates should be near the minimum, maximum, and average flow rates discharged. The totalizer should also be checked by a procedure approved by a California-registered engineer and subject to approval by the Districts. A copy of all data collected, any calculations performed, and any other pertinent information must be submitted to the Districts.
4. **Method of Calibration:** A detailed description of the method of calibration must be provided, including a description of any special pieces of equipment used and a schematic of the complete calibration setup showing all significant features and equipment. Manufacturer's certified calibration curves or data or recent laboratory curves or data must be submitted for any manufactured flow metering device used to check the calibration of the flow monitoring system.

The method and instrumentation used to perform the calibration must be sufficiently accurate ( $\pm 2\%$  of rate or better) to allow calibration of the system to within  $\pm 5\%$  of the rate. The data obtained from the calibration system should be compared with readings obtained simultaneously on the same flow from the company's existing flow meter. The installed flow monitoring system should then be adjusted to record and totalize the correct flows as indicated by the calibration system data.



5. **Corrective Measures:** All effluent flow monitoring systems must indicate, record, and totalize within  $\pm 5\%$  of the actual discharge flow rate. If the system does not perform within these limits, appropriate corrective action must be taken. Prior to any major system modifications, a description and plans, if necessary, of the proposed modifications must be submitted to the Districts for approval. Any minor adjustments or parts replaced should be described in the report to the Districts.

[Attachment A continued on the next page.]

**ATTACHMENT A**

**ADVANCO CONSTRUCTORS DIVISON OF ZURN CONSTRUCTION  
PERMIT NO. 5-84**

**EFFLUENT FLOW METER AND FLOW DATA REQUIREMENTS  
(continued)**

<b>ADVANCO CONSTRUCTORS DIV. OF ZURN CONSTRUCTION</b>	<b>Permit No.: 5-84</b>
<b>Contact:</b>	<b>Month:</b>

<b>EFFLUENT METER READINGS</b>			
<b>DATE</b>	<b>READING</b>	<b>UNITS</b>	<b>COMMENTS</b>
		<input type="checkbox"/> gal <input type="checkbox"/> cu.ft. <input type="checkbox"/> Other _____	
		<input type="checkbox"/> gal <input type="checkbox"/> cu.ft. <input type="checkbox"/> Other _____	
		<input type="checkbox"/> gal <input type="checkbox"/> cu.ft. <input type="checkbox"/> Other _____	
		<input type="checkbox"/> gal <input type="checkbox"/> cu.ft. <input type="checkbox"/> Other _____	
		<input type="checkbox"/> gal <input type="checkbox"/> cu.ft. <input type="checkbox"/> Other _____	

<b>TOTAL DISCHARGE VOLUME</b>		
<b>Current Month</b>		<b>Gallons</b>
<b>Project to Date</b>		<b>Gallons</b>

**CERTIFICATION STATEMENT**

I certify that, to the best of my knowledge, there is no direct discharge, whatsoever, of groundwater to the Districts' sewer system. I understand that if the preceding statement is incorrect, I must immediately notify the Districts in writing.

Authorized Signature: \_\_\_\_\_

Name (Printed): \_\_\_\_\_

Title: \_\_\_\_\_

Date: \_\_\_\_\_

# SELF-MONITORING REPORTS FOR TOTAL TOXIC ORGANICS AND CYANIDE

REQUIRED PARAMETERS			Sampling Dates		Submission Date		
TTO 624					20th of the following month		

**COMPANY:** \_\_\_\_\_  
**CONTACT:** \_\_\_\_\_  
**SAMPLING TIME:** \_\_\_\_\_

**PERMIT NO.** \_\_\_\_\_  
**SAMPLE DATE:** \_\_\_\_\_  
**SAMPLE POINT LOCATION:** \_\_\_\_\_

SAMPLING RESULTS							
	CYANIDE (mg/L)		TOTAL TOXIC ORGANICS (μg/L)				Districts' Use Only
	CN(T)*	CN(A)*					
EPA Method			601/602	604	624	625	
1	■	■	■	■	■	■	
2	■	■	■	■	■	■	
3	■	■	■	■	■	■	
4	■	■	■	■	■	■	
Ave.							

**COMMENTS:** \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

\* A minimum of four grab samples shall be taken independently during hours of operation within a 24-hour period. Each sample shall be combined, and the combined sample be analyzed for cyanide. Were the composite results obtained using four grab samples ( ) Yes ( ) No

**This form must be completely filled out and Laboratory Analysis Reports must be attached.**

In accordance with 40 CFR 403.12, the results presented herein must be verified and signed under penalty of perjury by (i) a responsible corporate officer; (ii) general partner or proprietor; or (iii) a representative who has responsibility for the overall operation of the permitted facility, who has been authorized by the corporate officer, general partner or proprietor to sign such reports, and such authorization has been made in writing and submitted to the Districts.

I have personally examined and am familiar with the information submitted in this document. Based upon my inquiry of those individuals immediately responsible for obtaining the information reported herein, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature \_\_\_\_\_

Title \_\_\_\_\_

Date \_\_\_\_\_

**ATTACHMENT C**  
**SPECIAL CONDITIONS TO PERMIT NO. 5-84**

1. The wastewater shall be discharged at a rate that will not cause any interference or operational problems or damage to the sewerage facilities.
2. In case of any flow interference or operational problems, the permittee shall discontinue discharging wastewater to the sewerage system.
3. In accordance to Addendum No. 2, Contract No. 5-41-1, page 5 of 76, the permittee is excluded from permitting fees, user fees, or any other sewer fees.

**CONVERSE CONSULTANTS  
ORANGE COUNTY****Geotechnical and  
Environmental Engineering**185 East Paularino Avenue  
Suite B  
Costa Mesa, CA 92626714/444-9660  
FAX 714/444-9640

March 18, 1998

Mr. Stephen Rynas  
Orange County Area Supervisor  
California Coastal Commission  
South Coast Area Office  
200 Ocean Gate, 10<sup>th</sup> Floor  
Long Beach, California 90802-4302

**Subject: Coastal Development Permit Application 5-97-420**  
**Lido Sewage Pump Station Replacement and Gateway**  
**Park Landscaping, CSDOC Contract No. 5-41-1**  
**(Converse Project No. 96-32-441-01)**

Dear Mr. Rynas:

Converse Consultants (Converse) is the geotechnical and environmental engineer for the referenced project and rendered a report dated April 4, 1997 to the County Sanitation Districts of Orange County (CSDOC) dealing with the pertinent issues on the referenced project. In our report we calculated that between 200,000 and 400,000 gallons per day of dewatering would be required to allow construction of the 25+ feet below ground surface pump station to be installed. Currently the groundwater is at about 5 feet below ground surface.

We understand that in 1996 the Orange County Health Care Agency (County) raised concern regarding the potential migration of the gasoline impacted groundwater toward the residential area. The County's concern was based on the possible groundwater mounding from the inflow of irrigation water at the proposed park.

Based on Converse's review of recent groundwater analytical data from the site, the concentration of gasoline constituents in the groundwater has decreased significantly since 1996. In addition, Converse understands that gasoline impacted soil has been excavated and treated and therefore the threat of continued leaching of gasoline to the groundwater has been significantly reduced.

It is our conclusion that during the proposed dewatering activity, groundwater in the area will migrate toward the dewatered area (on the subject property) rather than away from the property (toward the residential area). As a result of this project, it is our opinion that the amount of contaminated groundwater will be reduced in the area as a result of the planned construction.

**EXHIBIT No. 10**

Application Number:

**5-97-420****Converse Letter**California Coastal  
Commission

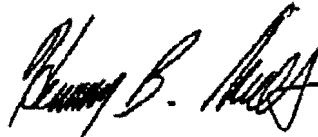


Mr. Stephen Rynas  
California Coastal Commission  
Converse Project No. 96-32-441-01  
March 18, 1998  
Page No. 2

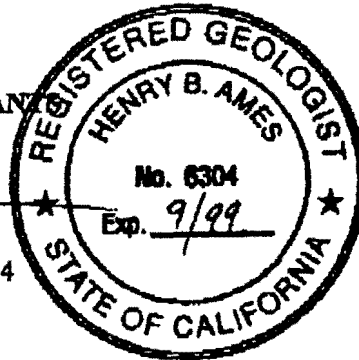
If you have questions concerning this letter, please contact us at (714) 444-9660.

Sincerely

CONVERSE CONSULTANTS



Henry B. Ames, R.G.# 6304  
Senior Geologist



hba/tjs

cc: Mr. Chuck Winsor, CSDOC  
Mr. William Brooks, CSDOC

