

CALIFORNIA COASTAL COMMISSION

NORTH COAST DISTRICT OFFICE

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**RECORD PACKET COPY****F6c**

Filed:	June 8, 2000
49 th Day:	July 27, 2000
180 th Day:	December 5, 2000
Staff:	Jim Baskin
Staff Report:	July 21, 2000
Hearing Date:	August 11, 2000
Commission Action:	

STAFF REPORT: REGULAR CALENDAR

APPLICATION NO.:	1-00-012
APPLICANT:	City of Arcata - Public Works Department
PROJECT LOCATION:	Within the City of Arcata's Corporation Yard / Sewage Treatment Plant Complex, 600 South G Street, Arcata, Humboldt County. APN 503-241-13.
PROJECT DESCRIPTION:	Construction of a 4,000-square-foot public transit bus barn and attached 910-square-foot canopied storage area, and installation of an oil-water separator and landscaping.
LOCAL APPROVALS RECEIVED:	City of Arcata Use Permit and Environmental Negative Declaration No. 990-069-CUP-END, City of Arcata Design Review No. 990-068-DR.
OTHER APPROVALS REQUIRED:	None.
SUBSTANTIVE FILE DOCUMENTS:	City of Arcata Local Coastal Program; and AMRTS Bus Barn Project Description and "R1" Engineering Report (Duane K. Greenwood, PE, Public Works Director / City Engineer, February 28, 2000).

SUMMARY OF STAFF RECOMMENDATION

Staff recommends that the Commission approve with conditions the proposed construction of a 4,000-square-foot bus barn and 910-square-foot canopied storage area to house the City's public transit busses and related equipment. The project site is located adjacent to Arcata Bay, the northern lobe of Humboldt Bay, within the Commission's original permit jurisdiction area. The primary need for the project is to provide a secure storage and routine maintenance area for the City's bus fleet. The busses are currently stored at the proposed barn site on a graded gravel pad exposed to the elements.

The project raises two principal concerns regarding Coastal Act issues, ensuring the protection of (1) coastal water quality, and (2) potential adverse cumulative environmental effects to coastal visual and scenic resources.

Although situated behind a levee within an established public facility complex, the proposed project site is located in relatively close proximity to coastal waters. Runoff from the project site is presently conveyed into an oil-water separator prior to entering the City's sewage treatment works. The proposed project includes the installation of a second oil-water separator dedicated to serving the bus barn and surrounding re-fueling island and municipal vehicle maintenance building.

If not carefully conducted the intended use could result in releases of hazardous materials. Accidental spills during the routine maintenance of the transit busses or materials handling could result in releases onto surrounding areas. These risks of accidental releases are addressed through the use of spill prevention, material handling and storage best management practices (BMPs) incorporated within the City's maintenance operational procedures and required by the State Water Resources Control Board. Staff also recommends a condition requiring, prior to issuance, the provision of a spill prevention and response plan to minimize the risks of accidental releases of hazardous materials from entering coastal waters.

The project site is also located within a highly scenic area along the shoreline of Arcata Bay. The site is visible from several points along public roads and from recreational areas, as well as from the waters of Arcata Bay. To soften the visual expression of the proposed development and that of the corporation yard as a whole, the project proposal includes a landscaping plan for placing a minimum of 160 native trees and shrubs along the perimeter of the corporation yard.

To ensure the successful establishment and ongoing viability of the proposed planting buffer, a condition requiring approval of a final landscaping plan addressing maintenance, irrigation, and upkeep has been included within the staff recommendation. As conditioned to require the approval of a landscaping plan, the project is consistent with the visual resource policies of the Coastal Act.

Staff believes the proposed project as conditioned is consistent with the Coastal Act and recommends approval.

STAFF NOTES

1. Jurisdiction and Standard of Review.

The proposed project is located within the incorporated boundaries of the City of Arcata within the City's corporation yard / sewage treatment works along the shores of Arcata Bay, in Humboldt County. The City of Arcata has a certified LCP, but the project site is within the Commission original coastal development permit jurisdiction. Therefore, the standard of review that the Commission must apply to the project is the Coastal Act.

STAFF RECOMMENDATION:

The staff recommends that the Commission adopt the following resolution:

I. **MOTION, STAFF RECOMMENDATION, AND RESOLUTION**

The staff recommends that the Commission adopt the following resolution:

Motion:

I move that the Commission approve Coastal Development Permit No. 1-00-012 pursuant to the staff recommendation.

Staff Recommendation of Approval:

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

Resolution to Approve Permit:

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

II. STANDARD CONDITIONS: See attached.

III. SPECIAL CONDITIONS:

1. Spill Prevention / Response Plan

A. PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT,
the applicant shall submit, for review and approval of the Executive Director, a plan for erosion and run-off control.

- 1) The run-off, spill prevention and response plan shall demonstrate that:
 - (a) Run-off from the project bus barn and equipment storage sites shall not increase sedimentation in coastal waters;
 - (b) Run-off from the project bus barn and equipment storage sites shall not result in pollutants entering coastal waters;
 - (c) Best Management Practices (BMPs) shall be used to prevent the entry of polluted stormwater runoff into coastal waters during the storage and maintenance of City transit vehicles, or related fuels, solvents and lubricants including but not limited to the following:
 - (i.) stormwater runoff diversion immediately up-gradient of the excavation for bus barn and storage area foundations; and
 - (ii.) use of relevant best management practices (BMPs) as detailed in the "California Storm Water Best Management (Construction and Industrial/Commercial) Handbooks, developed by Camp, Dresser & McKee, *et al.* for the Storm Water Quality Task Force (i.e., BMP Nos. CA3-*Structure Construction and Painting*, CA10-*Material Delivery and Storage*, CA11-*Material Use*, CA12-*Spill Prevention and Control*, CA23-*Concrete Waste Management*, ESC1-*Scheduling*, ESC2-*Preservation of Existing Vegetation*, ESC50-*Silt Fence*, ESC51-*Straw Bale Barriers*, SC2-*Vehicle and Equipment Fueling*, SC3- *Vehicle and Equipment Washing and Steam Cleaning*, SC4- *Vehicle and Equipment Maintenance and Repair*, SC11-*Buildings and Grounds Maintenance*, and TC7-*Oil/Water Separators and Water Quality Inlets*);
 - (d) An on-site spill prevention and control response program, consisting of best management practices (BMPs) for the storage of clean-up materials, training, designation of responsible individuals, and reporting protocols to the appropriate public and emergency services agencies in the event of a spill, shall be implemented at the project to capture and clean-up any accidental releases of oil,

grease, fuels, lubricants, or other hazardous materials from entering coastal waters.

- 2) The plan shall include, at a minimum, the following components:
 - (a) A schedule for installation and maintenance of appropriate construction source control best management practices (BMPs) to prevent entry of stormwater run-off into the bus barn, canopied storage area, and oil-water separator construction sites and the entrainment of excavated materials into run-off leaving the construction sites; and
 - (b) A schedule for installation, use and maintenance of appropriate construction materials handling and storage best management practices (BMPs) to prevent the entry of polluted stormwater run-off into coastal waters during the maintenance and storage of municipal transit vehicles.

B. The permittee 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 Commission amendment to this coastal development permit unless the Executive Director determines that no amendment is legally required.

2. Final Landscape Plan

A. **PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT**, the applicant shall submit, for the review and approval of the Executive Director, a plan for landscaping to screen the northern street frontage and western perimeter of the City of Arcata Corporation Yard / Wastewater Treatment Works to reduce cumulative adverse visual impacts of this municipal public facilities complex. The plan shall be prepared by a licensed landscape architect.

1. The plan shall demonstrate that:
 - (a) All vegetation planted on the site will consist of native, salt-tolerant and drought-resistant plants;
 - (b) All planting will be completed within 60 days after completion of construction;
 - (c) Sufficient vegetation growth to screen the northern frontage and western perimeter consisting of a minimum of 80 trees (+50% native species) and 80 native shrub species will be provided; and

- (d) All required plantings will be maintained in good growing conditions throughout the life of the project, and whenever necessary, shall be replaced with new plant materials to ensure continued compliance with the landscape plan.
- 2. The plan shall include, at a minimum, the following components:
 - (a) A map showing the type, scientific and common name, planting size, and location of all plant materials that will be on the developed site, the irrigation system, topography of the developed site, and all other landscape features; and
 - (b) A schedule for installation, maintenance and upkeep (i.e., pruning, fertilizing, weeding) of the landscaping plants.
- B. The permittee shall undertake development in accordance with the approved final 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 Commission amendment to this coastal development permit unless the Executive Director determines that no amendment is required.

3. **State Lands Commission Review.**

PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicant shall submit to the Executive Director a written determination from the State Lands Commission that:

- a. No State lands are involved in the development; or
- b. State lands are involved in the development and all permits required by the State Lands Commission have been obtained; or
- c. State lands may be involved in the development, but pending a final determination an agreement has been made with the State Lands Commission for the project to proceed without prejudice to that determination.

IV. **FINDINGS AND DECLARATIONS.**

A. **Project Description.**

The proposed project consists of the construction of: (a) a 4,000-square-foot, 22.5-foot-height bus barn to house the City's Arcata – Mad River Transit System (AMRTS) public

transit fleet, (b) an attached 910-square-foot, 12-foot-height canopied storage area, (c) installation of a oil-water separator stormdrain, and (d) placing a minimum of 80 (+50% native species) trees and 80 native shrub plants along the northern and western sides of the project site. The purpose of the project is to provide an enclosure in which the City's bus fleet may be parked and have routine maintenance performed, and to provide a covered equipment storage area. The proposed second oil-water separator would be installed to provide a pollution control device dedicated to municipal vehicular areas, leaving the existing separator to intercept stormwater runoff from the remainder of the corporation yard. The landscaping would be placed to mitigate the cumulative impacts to visual resources from existing and proposed site developments.

All development proposed under the permit application except for the storage and subsequent removal of contaminated soil and groundwater is to be completed in approximately one month.

B. Site Description.

The project site is located within the City of Arcata's corporation yard / wastewater treatment plant complex along the northern shoreline of Arcata Bay --- the northern lobe of Humboldt Bay. The corporation yard is situated at the City's southern end, between Humboldt Bay and Arcata's "South of G Street" commercial-industrial area. The corporation yard and treatment plant was constructed on fill in a reclaimed portion of Humboldt Bay in the 1940's. There are numerous coastal access and recreational amenities for hiking, cycling, bird-watching, and boating in the project vicinity, including the adjoining Arcata Marsh and Wildlife Sanctuary, the Butcher Slough Restoration Project, and the Arcata Marsh Interpretative Center. The project site has a Coastal Public Facility (C-P-F) land use and zoning designation. Highway 101 lies approximately ¼ mile to the east of the site.

The proposed bus-barn and storage area would be constructed in an open area within the corporation yard surrounded by several equipment storage and vehicular maintenance buildings of similar height, bulk and exterior appearance. The bus-barn site is currently a graded flat at an elevation of approximately +7 feet above mean sea level (msl). All portions of the proposed project, including its foundations excavations-at-depth would be located above the mean high tide line (± 3 msl) and do not involve activities within coastal waters delineated by that elevation. The corporation yard is constructed on trust lands administered by the State Lands Commission, however, efforts to effect transfer by legislative grant to the City of Arcata are ongoing. The project site is within an area of the Commission's original coastal development permit jurisdiction.

The project does require conditional use permitting and design review by the City. On April 11, 2000, the City of Arcata's Planning Commission issued Conditional Use Permit and Environmental Negative Declaration No. 990-069-CUP-END. On February 16, 2000, the City's Design Review Commission approved Design Review Permit No. 990-

068-DR finding the proposed remediation work consistent with the visual resources policies of its Land Use and Development Guidelines. Neither Commission's actions were appealed to the City Council and the project's conditional approval became effective on April 26, 2000.

C. Protection of Marine Resources and Coastal Water Quality.

Section 30231 of the Coastal Act addresses the protection of coastal water quality in conjunction with development and other land use activities. Section 30231 reads:

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

The project site is located adjacent to both Arcata Bay, an enclosed inlet of the sea, and the lower reaches of Butcher Slough, a tidal-influenced coastal waterway. The proposed bus-barn and storage area would be situated approximately 275 feet from the coastal waters of Arcata Bay and approximately 450 feet from Butcher Slough. Although located behind a levee, impacts to coastal land and water resources could result if not adequately mitigated. During construction of the proposed building foundations, stormwater runoff across the building site could entrain excavated soil or other materials. In addition, accidental releases of hazardous materials associated with vehicular storage and maintenance activities conducted could similarly occur. If not properly intercepted and cleaned up, these materials could spread to adjacent unpaved areas of the site and contaminate soil and groundwater beneath the corporation yard.

As part of its mandated hazardous materials work plan, procedures have been developed for the City's vehicular maintenance personnel to follow during the handling and storage of fuels, solvents, and lubricants. However, the permit request did not include application of these or other measures for preventing accidental spills or clean-up responses in the project description. Accordingly, the Commission attaches Special Condition No. 2, requiring approval of a spill prevention plan prior to permit issuance. The plan is required to address and identify a variety of best management practices to address accidental spill prevention and source control contingencies associated with construction of the bus-barn structure. The plan will serve to further prevent and reduce potential releases of polluted runoff or hazardous materials into coastal resources.

These actions will ensure that the biological productivity and quality of coastal waters will be maintained. Therefore, as conditioned, the project is consistent with Section 30231.

D. Public Access and Recreation.

Coastal Act Sections 30210, 30211, and 30212 require the provision of maximum public access opportunities, with limited exceptions.

Section 30210 states:

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

Section 30211 states:

Development shall not interfere with the public's right of access to the sea where acquired through use or legislative authorization, including, but not limited to, the use of dry sand and rocky coastal beaches to the first line of terrestrial vegetation.

Section 30212 states:

(a) Public access from the nearest public roadway to the shoreline and along the coast shall be provided in new development projects except where:

(1) it is inconsistent with public safety, military security needs, or the protection of fragile coastal resources,

(2) adequate access exists nearby, or,

(3) agriculture would be adversely affected. Dedicated accessway shall not be required to be opened to public use until a public agency or private association agrees to accept responsibility for maintenance and liability of the accessway.

Coastal Act Section 30210 requires in applicable part that maximum public access and recreational opportunities be provided when consistent with public safety, private property rights, and natural resource protection. Section 30211 requires in applicable part that development not interfere with the public's right of access to the sea where acquired through use (i.e., potential prescriptive rights or rights of implied dedication). Section

30212 requires in applicable part that public access from the nearest public roadway to the shoreline and along the coast be provided in new development projects, except in certain instances, such as when adequate access exists nearby or when the provision of public access would be inconsistent with public safety.

In applying Sections 30211 and 30212, the Commission is limited by the need to show that any denial of a permit application based on these sections, or any decision to grant a permit subject to special conditions requiring public access, is necessary to avoid or offset a project's adverse impact on existing or potential public access.

Several policies within the Coastal Act also address the protection of oceanfront recreational opportunities.

The project site is located along the northern shoreline of Arcata Bay. Within ¼ mile to the east, west, and north of the project area are public coastal access facilities, comprising the bayside trails, birding blinds, picnic areas, and interpretation facilities of the Arcata Marsh and Wildlife Sanctuary. This facility receives heavy use by a combination of hikers, birders, recreation boaters, and other coastal visitors. Access to coastal areas through the City's corporation yard is not provided due to public safety concerns.

The project as designed and sited will not result in any interference with the public's right of access to the sea as granted or accrued. Further, an abundance of coastal access facilities are available nearby the site within the adjoining marsh sanctuary. In addition, given the potential hazards associated with civic activities conducted the corporation yard and wastewater treatment plant, providing access through the project site would not be appropriate due to public safety concerns. Therefore, the Commission finds that the proposed project as conditioned, which does not include substantial new public access, is consistent with the public access policies of the Coastal Act.

E. Visual Resources.

Section 30251 of the Coastal Act states that the scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance, and requires in applicable part that permitted development be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, and to be visually compatible with the character of surrounding areas. Furthermore, in designated highly scenic coastal areas, permitted development must be subordinate to the character of its setting.

The project site is located along the shoreline of northern Arcata Bay. The area setting is that of a public facility complex situated on an embayment surrounded by a coastal plain of low topographic relief. Surrounding land uses to the east and west are primarily open space / wildlife refuge and agricultural grazing. To the north of the corporation yard lies the City's "South G Street" industrial-commercial district. The site is visible from several public recreational areas and roads, including the Arcata Marsh and Wildlife Sanctuary,

the Butcher Slough Restoration Site, and South G Street. The City of Arcata LCP does not designate the project area as “highly scenic.”

The project components that affect coastal visual resources relate to the cumulative effects to coastal visual resources from corporation yard improvements. During the last two decades, numerous buildings have been constructed on the corporation yard grounds, resulting in an eclectic assortment of special civic use structures. As site development has occurred, bay viewing corridors between the buildings have been replaced by building facades. Over time, the visual setting of the project site’s immediate area has changed, becoming more urbanized in appearance.

To mitigate these effects, the City has included a landscaping plan within the project description. The plan proposes that a minimum of 80 trees and 80 shrubs be planted along the northern and western perimeter of the corporation yard. The tree would include willows (Salix sp.), alders (Alnus sp.), and maples (Acer sp.), with a minimum of 50% being native species. All 80 of the shrubs would be native species, such as Pacific wax-myrtle (Myrica californica), flowering current (Ribes sp.), ceanothus (Ceanothus sp.), coyotebrush (Baccharis pillularis), or cascara (Rhamnus purshiana). In addition, a new drip-irrigation system would also be installed along the site perimeter for watering the trees and shrubs.

The Commission finds that the proposed landscaping plan will provide a vegetative buffer between the project site and public coastal viewing areas that will effectively screen existing and proposed site improvements. The landscaping will be consistent with the surrounding areas, as it will be comprised of plant species found in the immediate vicinity.

To ensure the successful establishment and ongoing viability of the proposed vegetated visual screening, the Commission attaches Special Condition No. 2 requiring approval of a final landscaping plan addressing provisions for their maintenance, irrigation, replacement, and upkeep. The Commission thus finds, that as conditioned, the proposed project will: (a) include adequate measures to insure that the scenic and visual qualities of coastal areas are considered and protected; (b) insure that permitted development is sited and designed to protect views to and along the ocean and scenic coastal areas; and (c) minimize the alteration of natural land forms.

F. State Waters.

Portions of the project site are in areas that are State-owned waters or were otherwise subject to the public trust. Therefore, to ensure that the applicant has the necessary to undertake all aspects of the project on these public lands, the Commission attaches Special Condition No. 3, which requires that the project be reviewed and where necessary approved by the State Lands Commission prior to the issuance of a permit.

G. California Environmental Quality Act.

Section 13906 of the Commission's administrative regulation requires Coastal 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 any feasible alternatives or feasible mitigation measures available, which would substantially lessen any significant adverse effect that the activity may have on the environment.

The proposed project has been conditioned to be consistent with the policies of the Coastal Act. Special condition(s) have been attached to require mitigation measures which will minimize all adverse environmental impacts. As conditioned, there are no other feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse impacts which the activity may have on the environment. Therefore, the Commission finds that the proposed project, as conditioned to mitigate the identified impacts, can be found consistent with the requirements of the Coastal Act to conform to CEQA.

EXHIBITS:

1. Regional Location Map
2. Vicinity Map
3. Jurisdictional Map (excerpt)
4. Project Site Plans
5. Correspondence

APPENDIX A

STANDARD CONDITIONS

1. Notice of Receipt and Acknowledgement. The permit is not valid and development shall not commence until a copy of the permit, signed by the permittee or authorized agent, acknowledging receipt of the permit and acceptance of the terms and conditions, is returned to the Commission office.
2. Expiration. If development has not commenced, the permit will expire two years from the date on which the Commission voted on the application. Development shall be pursued in a diligent manner and completed in a reasonable amount of time. Application for extension of the permit must be made prior to the expiration date.
3. Interpretation. Any questions of intent of interpretation of any condition will be resolved by the Executive Director of the Commission.
4. Assignment. The permit may be assigned to any qualified person, provided assignee files with the Commission an affidavit accepting all terms and conditions of the permit.
5. Terms and Conditions Run with the Land. These terms and conditions shall be perpetual, and it is the intention of the Commission and the permittee to bind all future owners and possessors of the subject property to the terms and conditions.

A B C D E F G H I J K L M N O

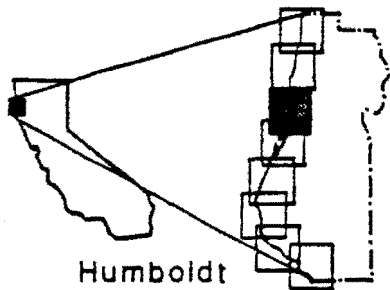
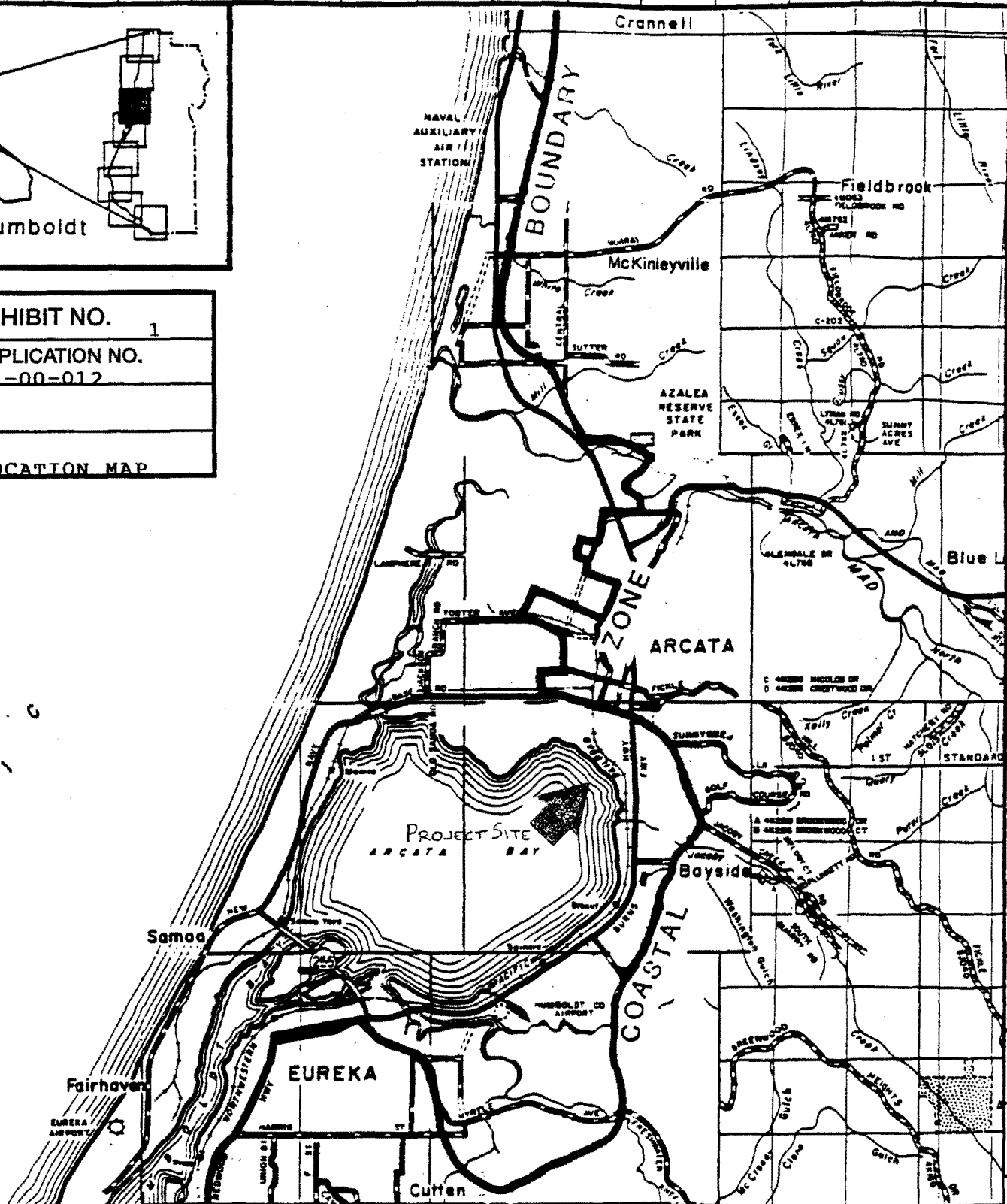


EXHIBIT NO. 1
APPLICATION NO.
1-00-012

LOCATION MAP



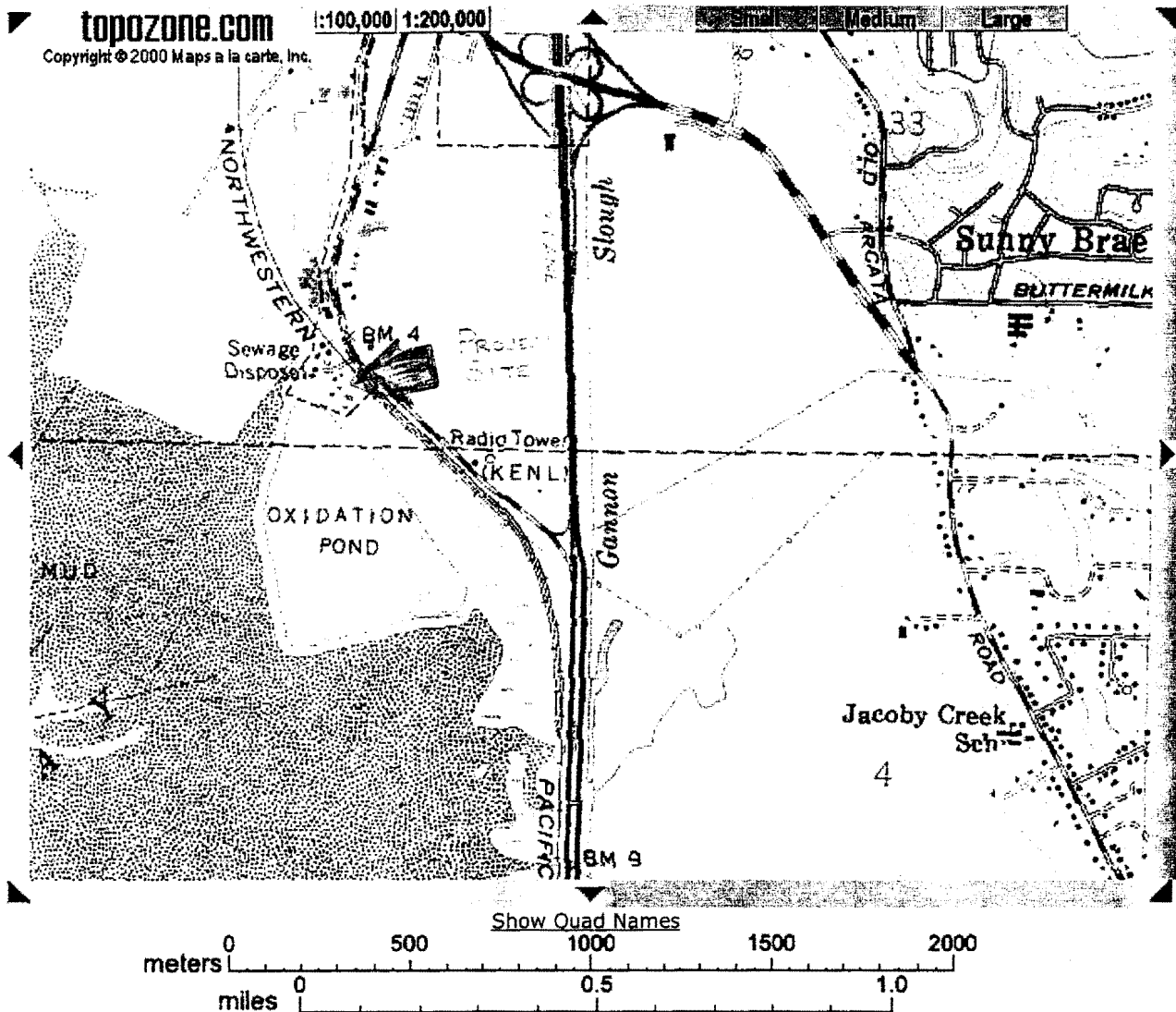


EXHIBIT NO. 2

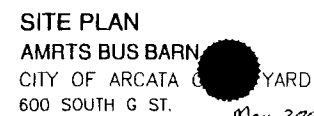
APPLICATION NO.
1-00-012

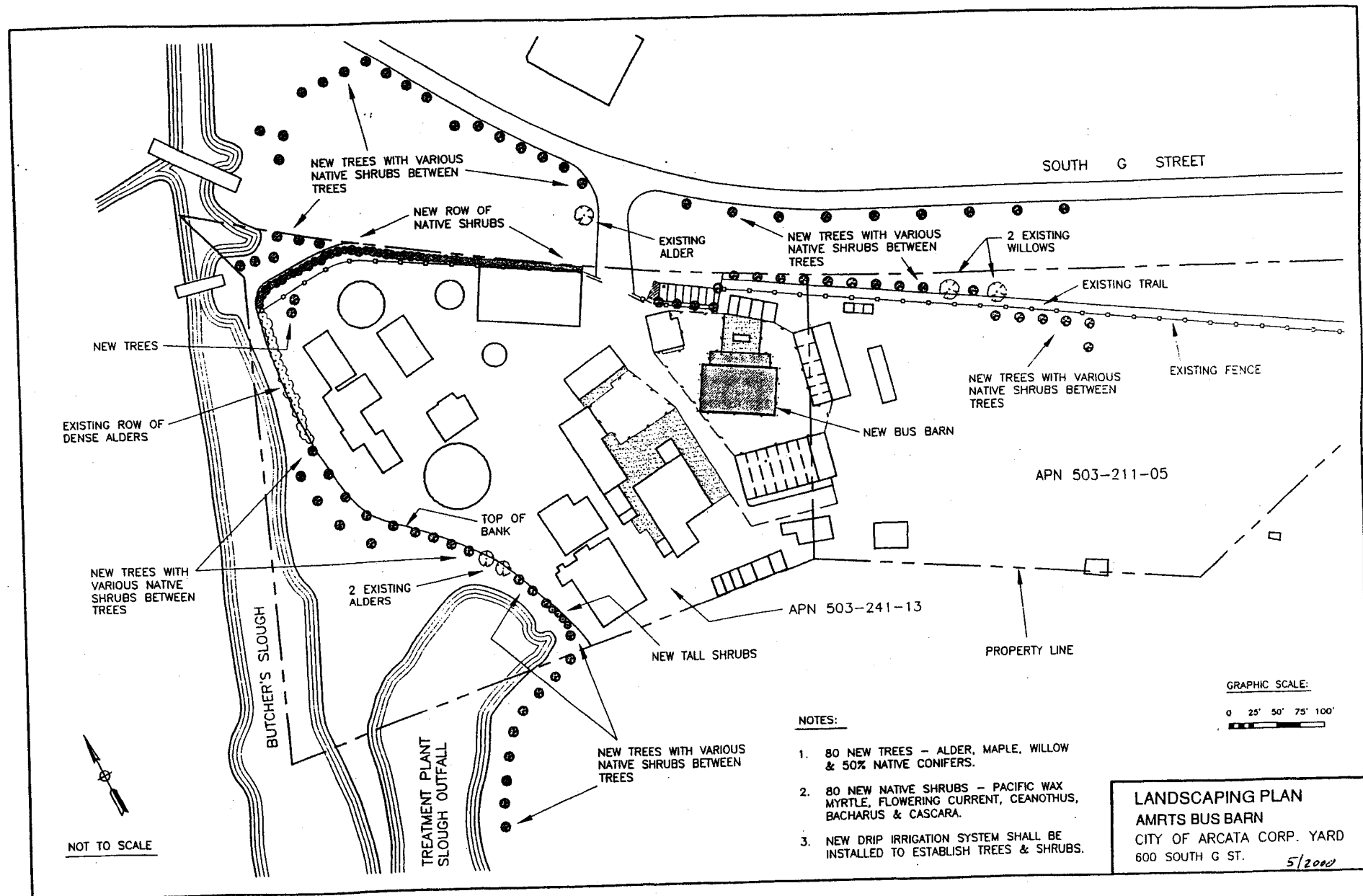
VICINITY MAP

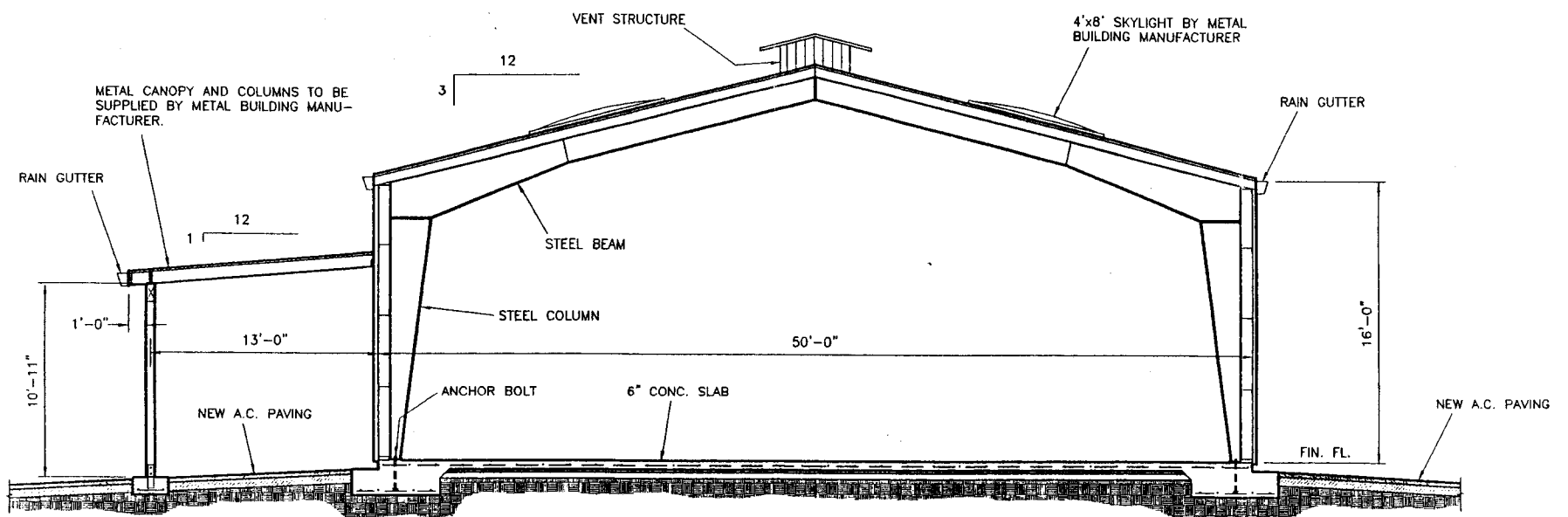


EXHIBIT NO. 3
APPLICATION NO. 1-00-012
JURISDICTION MAP (EXCERPT)

PROJECT SITE
PLANS (1 of 5)

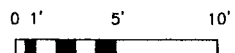




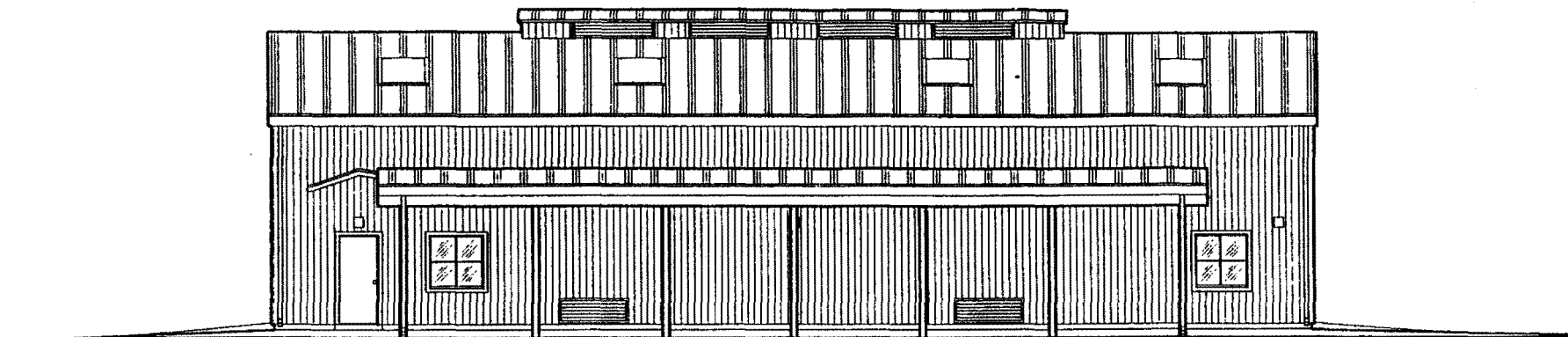


SECTION - A

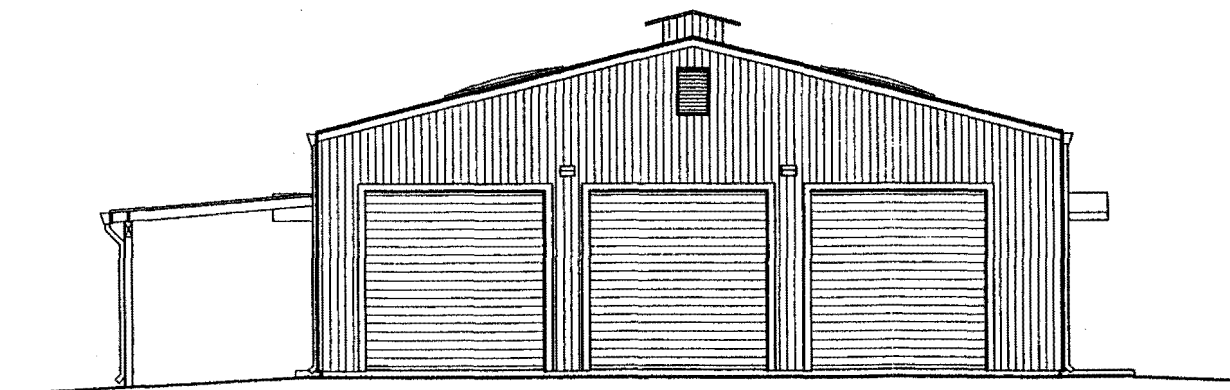
GRAPHIC SCALE:



BUILDING CROSS-SECTION
 AMRTS BUS BARN
 CITY OF ARCATA CO. ROAD
 600 SOUTH G ST.



NORTH ELEVATION

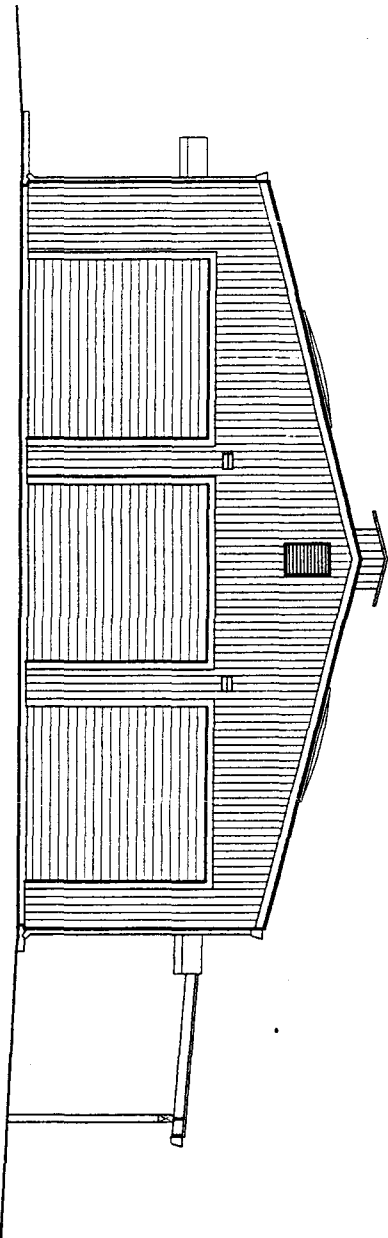


WEST ELEVATION

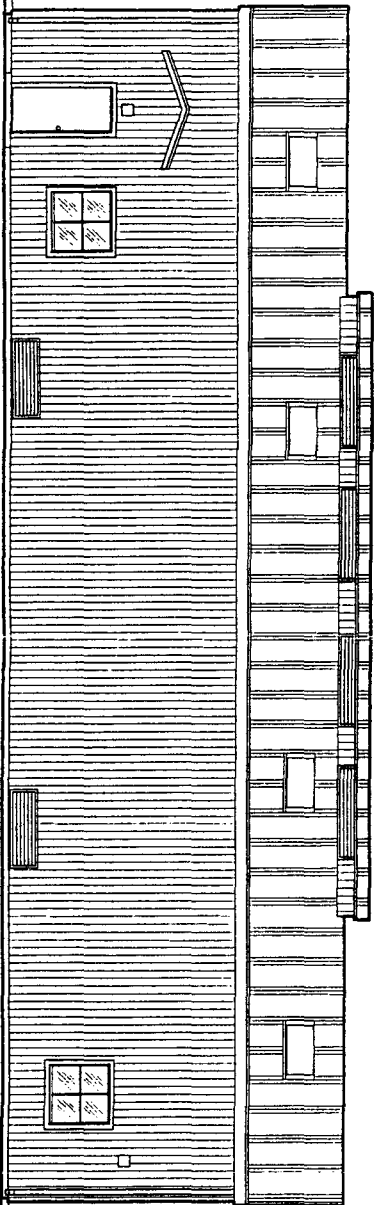
GRAPHIC SCALE:



BUILDING ELEVATIONS
AMRTS BUS BARN
 CITY OF ARCATA CORP. YARD
 600 SOUTH G ST.



EAST ELEVATION

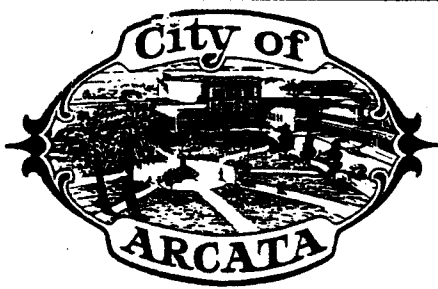


SOUTH ELEVATION

GRAPHIC SCALE:



BUILDING ELEVATIONS
AMRFT'S BUS BARN
 CITY OF ARCATIA CO
 600 SOUTH G ST.
 ARD



736 F Street Arcata California 95521

City Council
822-5953

A&MRTS
822-3775

Police
822-2428

Finance
822-5951

City Manager
822-5953

Community Development
822-5955

Public Works
822-5957

Parks & Recreation
822-7091

Environmental Services
822-8184

FAX
822-8018

Modem
822-1208

February 12, 1997

Bryant N. Sturgess, PLS, PE
Senior Boundary Officer
State Lands Commission
Division of Land Management
State of California
100 Howe Avenue, Suite 100-South
Sacramento, CA 95825-8202

Subject: Removal of Property from State Land Trust

Dear Mr. Sturgess,

Attached you will find an aerial photo which depicts the area that the City requests removed from the State Land Trust. I have outlined this area in red. If you find the outlined area to be acceptable, we will initiate a survey of the property. Where the boundary follows tidally influence lands, we will identify and map the limits of the mean high tide.

If you have any questions or require additional information, please do not hesitate to call.

Sincerely,

Brent C. Siemer, PE
Assistant City Engineer

Attachment - aerial with notes

cc: Duane Greenwood, Director of Public Works
Steve Tyler, Director of Environmental Services

EXHIBIT NO. 5
APPLICATION NO. 1-00-012
CORRESPONDENCE (1 of 2)



