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**CALIFORNIA COASTAL COMMISSION**

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**RECORD PACKET COPY**

Filed: 8/23/00  
49th Day: 10/11/00  
180th Day: 2/19/01  
Staff: S. Hudson  
Staff Report: 8/24/00  
Hearing Date: 9/12/00  
Commission Action:

**STAFF REPORT: REGULAR CALENDAR**

**APPLICATION NO.:** 4-00-129

**APPLICANT:** Level 3 Communications

**PROJECT LOCATION:** Approximately 1.2 mile long segment of Union Pacific Railroad Right-of-Way, Carpinteria; Santa Barbara County

**PROJECT DESCRIPTION:** Installation of approximately 1.2 miles of underground fiber-optic cable adjacent to existing railroad tracks within Union Pacific Railroad Right-of-Way.

**LOCAL APPROVALS RECEIVED:** N/A

**SUBSTANTIVE FILE DOCUMENTS:** Cultural Resources Assessment Addendum by Chambers Group dated 8/24/00; Cultural Resources Assessment by Chambers Group dated 6/10/99; Cultural Resources Survey Report prepared by Chambers Group dated 6/15/99; and Geomorphic Evaluation of Selected Cultural Sites by TRC Alton Geoscience dated 6/12/00.

**SUMMARY OF STAFF RECOMMENDATION**

Staff recommends **approval** of the proposed project with three (3) special conditions regarding a Revegetation and Erosion Control Plan and Monitoring Program, Archaeological Resources and Monitoring, and Removal of Excavated Material.

Archaeological resources have been identified within three separate portions of the subject site (listed in the State of California Archive as Archaeological Sites CA-SBA-6, CA-SBA-7, and SBA-1670). In addition, the project area includes two primary water courses (Franklin Creek and Carpinteria Creek) which are designated as environmentally sensitive habitat areas by the certified City of Carpinteria Local Coastal Program.

The project, as proposed, provides for the use of directional boring of the cable innerduct under all sensitive resource areas (including streams and archaeological sites) in order to avoid any adverse effects to those resources. In addition, Special Conditions One (1) and Three (3) have been required to ensure that the project area is adequately revegetated and that all excess excavated material is removed from site to an appropriate location in order to minimize site erosion and potential increased sedimentation of the nearby streams. To ensure that any potential adverse effects to cultural resources are minimized, Special Condition Two (2) requires the presence of a qualified archaeologist(s) and appropriate Native American consultant(s) on-site during all construction activity in or near the identified archaeological sites.

## **I. STAFF RECOMMENDATION**

**MOTION:**        *I move that the Commission approve Coastal Development Permit No. 4-00-129 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 a majority of the Commissioners present.

### **RESOLUTION TO APPROVE THE 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 and 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. 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**

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

### **III. Special Conditions**

#### **1. Revegetation and Erosion Control Plan and Monitoring Program**

Prior to issuance of a coastal development permit, the applicant shall submit a revegetation and erosion control plan and monitoring program, prepared by a licensed landscape architect or a qualified resource specialist, for review and approval by the Executive Director. The plans shall identify the species, extent, and location of all plant materials and shall incorporate the following criteria:

##### **A. Revegetation and Erosion Control Plan**

- (1) All graded & disturbed areas on the subject site shall be planted and maintained for erosion control purposes. To minimize the need for irrigation, all landscaping shall consist primarily of native/drought resistant plants. Invasive, non-indigenous plant species which tend to supplant native species shall not be used. Such planting shall be adequate to provide 90 percent coverage within five (5) years, and this requirement shall apply to all disturbed soils;
- (2) Plantings will be maintained in good growing condition throughout the life of the project and, whenever necessary, shall be replaced with new plant materials to ensure continued compliance with applicable landscape requirements;
- (3) The Permittee shall undertake development in accordance with the final approved plan. Any proposed changes to the approved final plan shall be reported to the Executive Director. No changes to the approved final plan shall occur without a Coastal Commission - approved amendment to the coastal development permit, unless the Executive Director determines that no amendment is required.

##### **B. Interim Erosion Control Plan**

- (1) The plan shall delineate the areas to be disturbed by grading or construction activities and shall include any staging areas and stockpile areas. The natural areas on the site shall be clearly delineated on the project site with fencing or survey flags.
- (2) The plan shall specify that should construction activities take place during the rainy season (November 1 – March 31) the applicant shall install or construct temporary sediment basins (including debris basins, desilting basins or silt traps), temporary drains and swales, sand bag barriers, silt fencing, stabilize any stockpiled fill with geofabric covers or other appropriate cover, install geotextiles or mats on all disturbed areas and close and stabilize open trenches as soon as possible. These erosion measures shall be required on the project site prior to or concurrent with the initial grading operations and maintained throughout the development process to minimize erosion and sediment from runoff waters during construction. All sediment should be retained on-site unless removed to an appropriate approved dumping location either outside the coastal zone or to a site within the coastal zone permitted to receive fill.
- (3) The plan shall also include temporary erosion control measures should grading or site preparation cease for a period of more than 30 days, including but not limited to:

stabilization of all stockpiled fill, access roads, disturbed soils and cut and fill slopes with geotextiles and/or mats, sand bag barriers, silt fencing; temporary drains and swales and sediment basins. The plans shall also specify that all disturbed areas shall be seeded with native grass species and include the technical specifications for seeding the disturbed areas. These temporary erosion control measures shall be monitored and maintained until grading or construction operations resume.

### **C. Monitoring**

Five years from the completion of construction activity, the applicant shall submit for the review and approval of the Executive Director, a revegetation monitoring report, prepared by a licensed Landscape Architect or qualified Resource Specialist, that certifies the on-site landscaping is in conformance with the revegetation plan approved pursuant to this special condition. The monitoring report shall include photographic documentation of plant species and plant coverage.

If the revegetation monitoring report indicates the landscaping is not in conformance with or has failed to meet the performance standards specified in the revegetation plan approved pursuant to this permit, the applicant, or successors in interest, shall submit a revised or supplemental revegetation plan for the review and approval of the Executive Director. The revised revegetation plan must be prepared by a licensed Landscape Architect or a qualified Resource Specialist and shall specify measures to remediate those portions of the original plan that have failed or are not in conformance with the original approved plan.

### **2. Archaeological Resources and Monitoring**

By acceptance of this permit, the applicant agrees to have a qualified archaeologist(s) and appropriate Native American consultant(s) present on-site during all grading, excavation (including boring), site preparation, or landscaping activities in or adjacent to the archaeological sites in the project area identified in the Cultural Resources Assessment Addendum by Chambers Group dated 8/24/00; Cultural Resources Assessment by Chambers Group dated 6/10/99; and the Cultural Resources Survey Report prepared by Chambers Group dated 6/15/99. The number of monitors shall be adequate to observe the earth moving and cable installation activities of each piece of active earth moving equipment. Specifically, the earth moving and cable installation operations on the project site shall be controlled and monitored by the archaeologist(s) with the purpose of locating, recording and collecting any archaeological materials. In the event that any significant archaeological resources are discovered during operations, all work in this area shall be halted and an appropriate data recovery strategy be developed, subject to review and approval of the Executive Director, by the applicant's archaeologist and the native American consultant consistent with CEQA guidelines.

### **3. Removal of Excavated Material**

Prior to the issuance of the coastal development permit, the applicant shall provide evidence to the Executive Director of the location of the disposal site for all excavated material from the site. Should the dump site be located in the Coastal Zone, a coastal development permit shall be required.

#### **IV. Findings and Declarations**

The Commission hereby finds and declares:

##### **A. Project Description and Background**

The proposed project is for installation of approximately 1.2 miles of underground fiber-optic cable adjacent to existing railroad tracks within the Union Pacific Railroad Right-of-Way in the City of Carpinteria (Exhibit 1). The purpose of the project is to provide a fiber-optics network for internet technology. The proposed 1.2 mile long cable segment, which is subject to this application, is part of a larger project to establish a data traffic line between facilities in San Francisco and Sacramento to facilities in Los Angeles and San Diego using an overland route.

The majority of the proposed 1.2 mile segment of fiber-optic cable will be installed using directional boring. This process involves the use of a surface-operated drilling device that is angled into the ground from the surface and directed to its destination using a radio-controlled "mole" that contains a cutter head. A sleeve (usually less than one ft. in diameter) is installed as a casing for the innerducts. Plowing and trenching are the other identified methods of cable installation and will involve excavation of a trench 5 ft. to 6 ft. feet deep and 1 ft. to 2 ft. in width. After the innerduct is installed, the fiber-optic cable will be pulled through the innerduct and spliced at regularly spaced handholes. The handholes are round concrete and fiberglass structures approximately 3 ft. in diameter that are buried approximately 6 inches to 24 inches below the surface (in some instances, handhole covers may be installed at grade). Access to the cable route will be via existing roads. All development and construction staging areas will be located within the previously disturbed railroad right-of-way.

Archaeological resources have been identified within three separate portions of the subject site (listed in the State of California Archive as Archaeological Sites CA-SBA-6, CA-SBA-7, and SBA-1670). In addition, the project area includes two primary water courses (Franklin Creek and Carpinteria Creek) which are designated as environmentally sensitive habitat areas (ESHA) by the certified City of Carpinteria Local Coastal Program. All proposed development will be located at or below grade and will not result in any adverse effects to public views.

Although the Commission has previously certified a Local Coastal Program (LCP) for the City of Carpinteria, approximately 1.2 miles of the approximately 3 mile long Railroad Right-of-Way within City limits was inadvertently excluded from the LCP due to uncertainties or lack of designated Land Use Plan and zoning designations, effectively creating a "hole" within the City's coastal permit authority jurisdiction (Exhibit 1). As such, coastal permit issuance authority for new development within the area excluded by the LCP (including the 1.2 mile long segment of the proposed project) is retained by the Commission. The City has indicated that the lack of applicable zoning and Land

Use Plan designations for the above identified 1.2 miles of Railroad Right-of-Way will be clarified as part of their upcoming comprehensive LCP Update Amendment which they intend to submit to the Commission in the near future. The City of Carpinteria has previously approved a coastal permit for the remaining approximately 1.8 mile portion of the fiber-optic cable project in the Railroad Right-of-Way within City limits which is located outside the 1.2 mile long LCP excluded area.

The installation of underground fiber-optic cable by Level 3 Communications has been the subject of past Commission action. Coastal Development Permit 4-00-006 was approved by the Commission in March 2000 for the installation of 11 miles of underground fiber-optic cable within the railroad right-of-way at Vandenberg Airforce Base (Santa Barbara County). The 11-mile long segment of fiber-optic cable previously approved by the Commission is part of the same above referenced larger project by Level 3 Communications (which includes the currently proposed Carpinteria segment) to establish a data traffic line between facilities in San Francisco and Sacramento to facilities in Los Angeles and San Diego using an overland route.

## **B. Environmentally Sensitive Habitat Area**

Section 30230 of the Coastal Act states that:

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

Section 30231 states:

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

Section 30240 states:

*(a) Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on such resources shall be allowed within such areas.*

*(b) Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would*

*significantly degrade such areas, and shall be compatible with the continuance of such habitat areas.*

Sections 30230 and 30231 of the Coastal Act require that the biological productivity and the quality of coastal waters and streams be maintained and, where feasible, restored through among other means, minimizing adverse effects of waste water discharge and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface water flows, maintaining natural buffer areas that protect riparian habitats, and minimizing alteration of natural streams. In addition, Section 30240 of the Coastal Act states that environmentally sensitive habitat areas must be protected against disruption of habitat values.

The project area will be located completely within the previously disturbed Union Pacific Railroad Right-of-Way. The applicant's biological consultants have conducted a survey of plant and animal species within the project area and determined that the project will not result in the loss of any native plant or wildlife habitat. No sensitive plant or wildlife species have been identified within the upland areas of the project site. The majority of the project area is dominated by non-native and invasive plant species. Areas of the site where native vegetation is located will be avoided by using directional boring.

Franklin Creek and Carpinteria Creek (designated as environmentally sensitive habitat areas by the certified City of Carpinteria Local Coastal Program) bisect the Railroad Right of Way. The crossing of the two streams will be achieved using directional boring under the stream courses to avoid any adverse effects to riparian habitat (see Exhibit 3). The innerduct will be installed a minimum of 20 feet below the stream bed with the surface entry and exit of the directional drill generally located more than 125 feet back from the top of the channel bank.

In order to further minimize or avoid any potential adverse effects to riparian habitat on site. The proposed project also includes the following specific mitigation measures:

- *Bore under sensitive habitat when practicable*
- *Implement erosion control measures during construction*
- *Confine construction equipment and associated activities to the construction corridor (approximately 20 feet wide)*
- *Refueling of construction equipment greater than 100 feet from aquatic environments*
- *Maintain hazard material spill kits in proximity to aquatic crossings*
- *Implement a spill prevention and response plan*
- *Restore site topography concurrently with innerduct installation*
- *Remove all innerduct installation debris, construction spoils, materials, and litter*
- *Complete post-construction monitoring and supplemental revegetation where needed pursuant to the Site Reclamation and Revegetation Plan.*

Although the above mentioned proposed mitigation measures indicate that revegetation of the project site is proposed, a specific revegetation plan has not been submitted. The Commission notes that the proposed project has the potential to result in increased erosion on site from the proposed trenching and construction activity. The Commission also notes that increased erosion on site would result in potential increased sedimentation of both Franklin Creek and Carpinteria Creek. Erosion can best be minimized by requiring the applicant to landscape all disturbed areas of the site with native plants compatible with the surrounding environment. Therefore, to ensure that the project site is adequately revegetated, Special Condition One (1) requires the submittal of a site-specific revegetation plan which indicates species, extent, and location of all plant materials to be used in the revegetation program.

Further, the Commission notes that the use of non-native and/or invasive plant species for landscaping results in both direct and indirect adverse effects to indigenous plant species. Direct adverse effects from such landscaping result from the direct occupation or displacement of native plant community habitat by new development and associated non-native landscaping. Indirect adverse effects include offsite migration and colonization of native plant species habitat by non-native/invasive plant species (which tend to outcompete native species) adjacent to new development. The Commission notes that the use of exotic plant species for landscaping has already resulted in significant adverse effects to native plant communities in coastal areas. Therefore, in order to minimize adverse effects to the indigenous plant communities, Special Condition Number One (1) also requires that all landscaping consist primarily of native plant species and that invasive plant species shall not be used. To ensure that the revegetation effort is successful, five years from the completion of construction activity, the applicant shall submit for the review and approval of the Executive Director, a revegetation monitoring report that certifies that the on-site landscaping is in conformance with the revegetation plan approved pursuant to this special condition. In addition, to ensure that onsite erosion is minimized during all cable installation activities, Special Condition One (1) also requires the submittal of a temporary erosion control measure plan for the stabilization of all excavated material and disturbed soils with geotextiles and/or mats, sand bag barriers, silt fencing, temporary drains, swales, and sediment basins.

Following installation of the innerduct, all surface soils which have been disturbed will be restored. In the case of open trenching, selected compact fill will be placed in the trench prior to regrading and revegetation. However, the Commission notes that the proposed installation of the cable innerduct casing (approximately one ft. in diameter) will result in the generation of some excess excavated material (boring tailings and excess trenched material that is not able to be recompacted). Excavated materials that are placed in stockpiles are subject to increased erosion and result in potential increased sedimentation of the identified stream courses on site. In order to ensure that any excavated material will not be stockpiled on site and that erosion is minimized,



Special Condition Three (3) requires the applicant to remove all excavated material from the site to an appropriate location and provide evidence to the Executive Director of the location of the disposal site prior to the issuance of the permit. Should the dump site be located in the Coastal Zone, a coastal development permit shall be required.

The Commission finds that the proposed project, as conditioned, is consistent with and adequate to carry the provisions of PRC Sections 30231 and 30240.

### **C. Archaeological Resources**

Coastal Act Section 30244 of the Coastal Act states that:

*Where development would adversely impact archaeological or paleontological resources as identified by the State Historic Preservation Officer, reasonable mitigation measures shall be required.*

Archaeological resources are significant to an understanding of cultural, environmental, biological, and geological history. The coastal act requires the protection of such resources to reduce the potential adverse impacts through the use of reasonable mitigation measures. Degradation of archaeological resources can occur if a project is not properly monitored and managed during earth moving activities and construction. Site preparation can disturb and/or obliterate archaeological materials to such an extent that the information that could have been derived would be permanently lost. In the past, numerous archaeological sites have been destroyed or damaged as a result of development. As a result, the remaining sites, even though often less rich in materials, have become increasingly valuable as a resource. Further, because archaeological sites, if studied collectively, may provide information on subsistence and settlement patterns, the loss of individual sites can reduce the scientific value of the sites which remain intact.

The applicant has submitted a Cultural Resources Assessment Addendum by Chambers Group dated 8/24/00; Cultural Resources Assessment by Chambers Group dated 6/10/99; and a Cultural Resources Survey Report prepared by Chambers Group dated 6/15/99 which indicate that Native American Archaeological resources have been identified within three separate portions of the subject site (listed in the State of California Archive as Archaeological Sites CA-SBA-6, CA-SBA-7, and SBA-1670). The Cultural Resources Assessment Addendum by Chambers Group dated 8/24/00 indicates that the maximum burial depth of cultural deposits and artifacts on site are not expected to be deeper than 5 ft. In order to avoid adverse effects to archaeological resources in the project area, the fiber-optic cable innerduct is proposed to be installed using directional boring (at a depth of 20 ft. or greater) under or near all identified archaeological sites.

The Commission notes that although the proposed project has been designed to avoid disturbance of archaeological resources on site, potential adverse effects to those resources may still occur due to inadvertent disturbance during construction activity. To ensure that impacts to archaeological resources are minimized, special condition Two (2) requires that the applicant have a qualified archaeologist(s) and appropriate Native American consultant(s) present on-site during all grading, excavation (including boring), site preparation, or landscaping activities in or adjacent to the archaeological sites in the project area identified in the Cultural Resources Assessment by Chambers Group dated 6/10/99 and the Cultural Resources Survey Report prepared by Chambers Group dated 6/15/99. The number of monitors shall be adequate to observe the earth moving and cable installation activities of each piece of active earth moving equipment. Specifically, the earth moving and cable installation operations on the project site shall be controlled and monitored by the archaeologist(s) with the purpose of locating, recording and collecting any archaeological materials. In the event that any significant archaeological resources are discovered during operations, all work in this area shall be halted and an appropriate data recovery strategy be developed, subject to review and approval of the Executive Director, by the applicant's archaeologist and the native American consultant consistent with CEQA guidelines.

Therefore, the Commission finds that the proposed project, as conditioned, is consistent with Section 30244 of the Coastal Act.

#### **D. Local Coastal Program**

Section 30604 of the Coastal Act states that:

*a) Prior to certification of the local coastal program, a coastal development permit shall be issued if the issuing agency, or the commission on appeal, finds that the proposed development is in conformity with the provisions of Chapter 3 (commencing with Section 30200) of this division and that the permitted development will not prejudice the ability of the local government to prepare a local program that is in conformity with the provisions of Chapter 3 (commencing with Section 30200).*

Section 30604(a) of the Coastal Act provides that the Commission shall issue a Coastal Permit only if the project will not prejudice the ability of the local government having jurisdiction to prepare a Local Coastal Program which conforms with Chapter 3 policies of the Coastal Act. As previously discussed, although the Commission has previously certified a Local Coastal Program (LCP) for the City of Carpinteria, approximately 1.2 miles of the approximately 3 mile long Railroad Right-of-Way within City limits was inadvertently excluded from the LCP due to uncertainties or lack of designated Land Use Plan and zoning designations, effectively creating a "hole" within the City's coastal permit authority jurisdiction (Exhibit 1). As such, coastal permit issuance authority for new development within the area excluded by the LCP (including the 1.2 mile long segment of the proposed project) is retained by the Commission. The City has indicated that the lack of applicable zoning and Land Use Plan designations for the

above identified 1.2 miles of railroad right-of-way will be clarified as part of their upcoming comprehensive LCP Update Amendment which they intend to submit to the Commission in the near future.

As such, the Commission notes that the preceding sections provide findings that the proposed project will be in conformity with the provisions of Chapter 3 if certain conditions are incorporated into the project and accepted by the applicant. As conditioned, the proposed development will not create adverse effects and is found to be consistent with the applicable policies contained in Chapter 3. Therefore, the Commission finds that approval of the proposed development, as conditioned, will not prejudice the City's ability to prepare an LCP Update Amendment (for inclusion of the subject area in the LCP) which is also consistent with the policies of Chapter 3 of the Coastal Act as required by Section 30604(a).

## **E. CEQA**

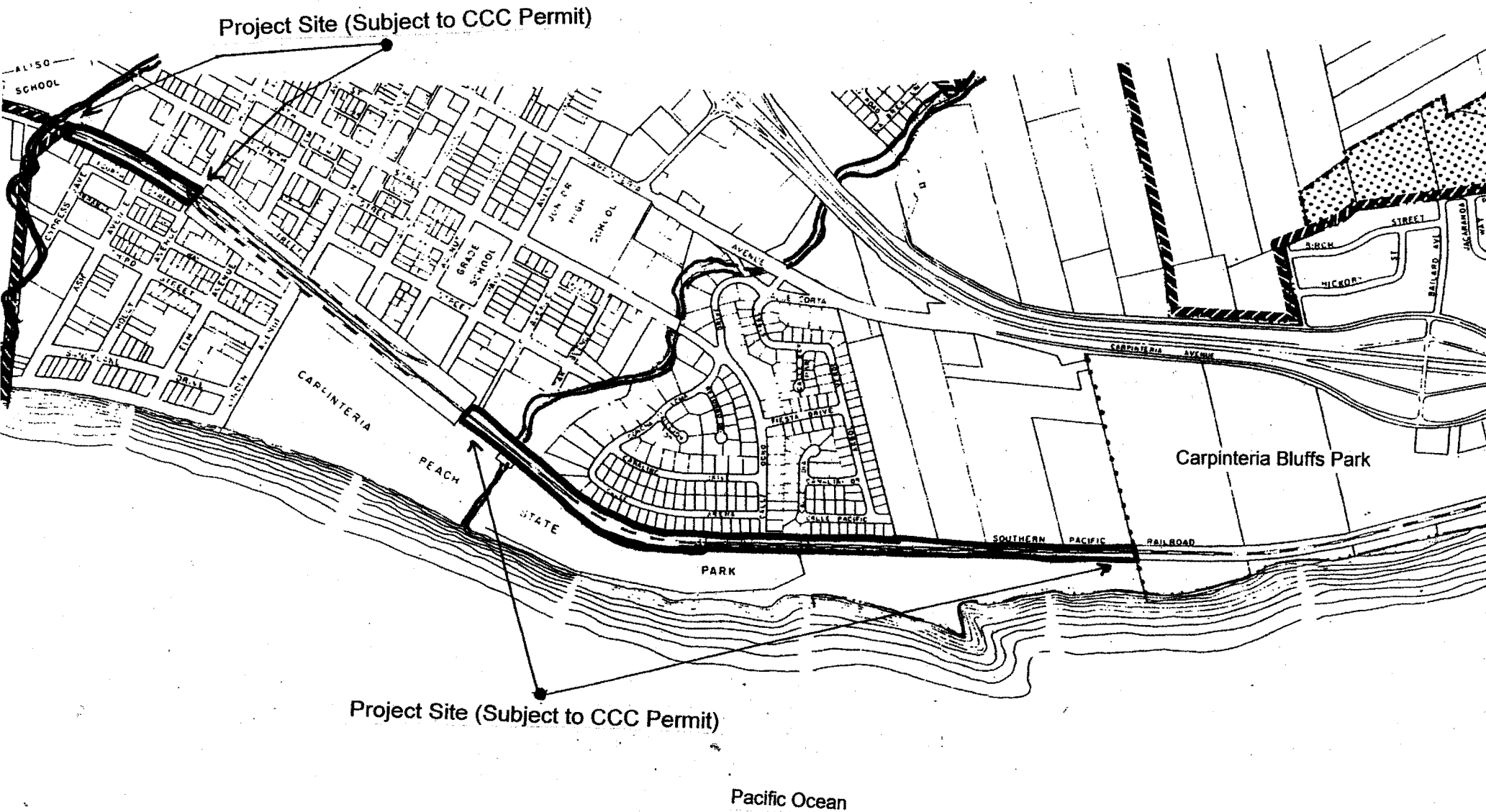
Section 13096(a) of the Commission's administrative regulations requires Commission approval of Coastal Development Permit application to be supported by a finding showing the application, as conditioned by any conditions of approval, to be consistent with any applicable requirements of the California 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 Commission finds that, the proposed project, as conditioned will not have significant adverse effects on the environment, within the meaning of the California Environmental Quality Act of 1970. Therefore, the proposed project, as conditioned, has been adequately mitigated and is determined to be consistent with CEQA and the policies of the Coastal Act.

**SMH-VNT**

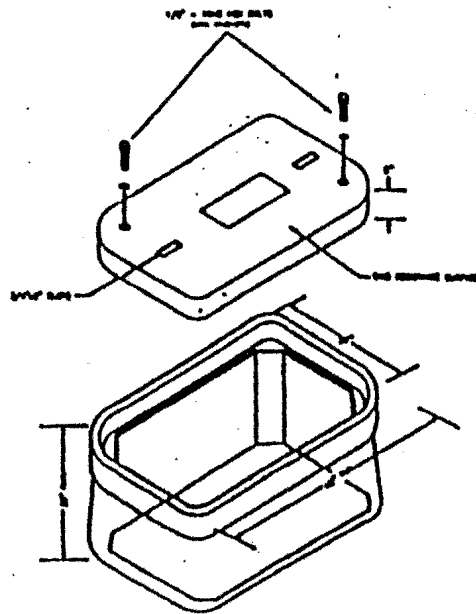
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# PROJECT AREA PLAN



|                        |
|------------------------|
| EXHIBIT 1              |
| CDP 4-00-129 (Level 3) |
| Project Site/Area Map  |

# HANDHOLE AND CABLE DETAIL



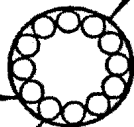
## PROFILE

PROPOSED COMMUNICATIONS CABLE

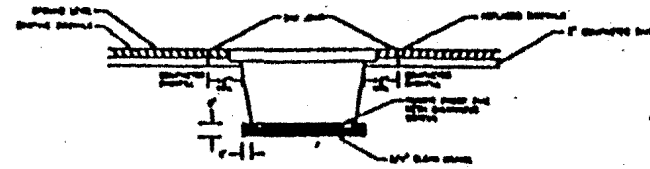
1-1/4" HDPE

12 x 1" DIA. COMMUNICATIONS CABLE

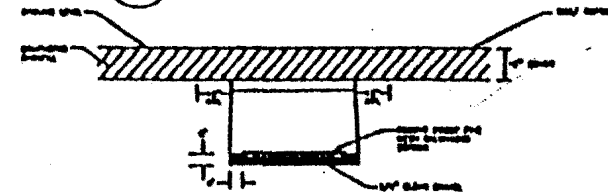
HDPE - HIGH DENSITY POLYETHYLENE



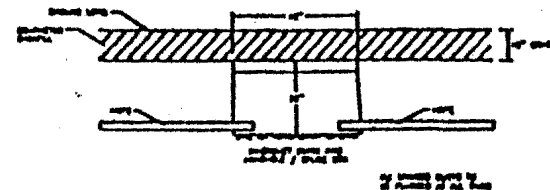
STEEL CONDUIT.



1 INSTALLATION IN SIDEWALK AREA  
0007 NOT TO SCALE



2 INSTALLATION IN UNPAVED AREA  
0007 NOT TO SCALE    ΔΔ



ANGLE OF ENTRY NOT TO EXCEED 1.5' RISE IN 8'

3 STANDARD ENCLOSURE  
0007 NOT TO SCALE    ΔΔ

## TYPICAL STREAM CROSSING

