

**CALIFORNIA COASTAL COMMISSION**

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## RECORD PACKET COPY

**Tu14a**

Date Filed:	12/19/00
49 <sup>th</sup> Day:	02/06/01
180 <sup>th</sup> Day:	06/17/01
Staff:	DC-SF
Staff Report:	12/21/00
Hearing Date:	01/09/01
Item No:	Tu14a

**STAFF REPORT:  
MATERIAL AMENDMENT**

**Application No:** E-98-026-A1

**Project Applicant:** Chevron Pipe Line Company

**Location:** Site of former Chevron Estero Marine Terminal, State Lease PRC 2478.1 and Atascadero Beach, City of Morro Bay, San Luis Obispo County (Exhibit 1).

**Project Description:** The applicant proposes to amend Coastal Development Permit E-98-026 by: (a) designating an equipment staging area and beach access route south of Toro Creek and directly west of Highway 1; (b) removing four telephone poles and associated wire from two bluff areas 20-100 feet seaward of Highway 1; and (c) if necessary, use night lighting.

**Substantive File Documents:** See Appendix B.

**SYNOPSIS**

In September 1999, the Coastal Commission approved coastal development permit ("CDP") E-98-026 to partially abandon the Chevron Estero Bay Marine Terminal. The project involves the removal or abandonment in place of offshore mooring buoys, anchors and chains, cathodic protection system, submarine hoses, anodes, pier pilings and other remnants of the marine terminal. The applicant divided marine terminal abandonment into three phases. Phase 1 involved the removal of offshore mooring buoys, anchors, and chains. Phase 2 work entailed the

offshore pipeline abandonment. To date, Phases 1 and 2 have been completed. What remains of approved Phase 3 activities is to remove the pier pilings and five anodes from the beach.

This proposed amendment to CDP E-98-026 encompasses three additional activities: (a) the use of a staging and access area south of Toro Creek and directly across from Highway 1; (b) removal of four telephone poles and associated wires north and south of Toro Creek, 20-100 feet west of Highway 1 and; (c) the use of night lighting on the beach areas to support Phase 3 abandonment activities, if necessary.

Removal of the anodes and pier pilings requires the lowest possible tides to access the lowest areas of the beach. The original proposed Phase 3 work was anticipated to commence in November 2000, which did not occur, and continue into February 2001. Moreover, the Army Corps of Engineers has limited Phase 3 abandonment activities to January and February (to avoid the snowy plover nesting season) which coincides with only four minus tide cycles. As a consequence, if weather is unfavorable during a minus tide event, it may not be possible to complete all Phase 3 tasks within the restricted time frame. Therefore, the applicant is proposing to use night lighting, if necessary.

Potential Coastal Act issues relate to potential impacts to a rare, coastal dune plant species, the red sand-verbena (*Abronia maritima*) and temporary impacts to public access and recreation. The applicant is committing to avoid any disturbance or impact to the sand-verbena and has proposed several avoidance measures, including the flagging of nearby sand-verbena plants and an on-site biological monitor to oversee the pole removal work. Moreover, staff is recommending special conditions that require: a) the submission of a photographic biological survey prior to pole removal work; b) the delineation of the proposed construction zone excluding any sand-verbena plants; c) the documentation of any impact to sand-verbena and; d) the submission of a sand-verbena restoration plan in the form of a permit amendment to this permit if any impacts to the sand-verbena occur, as documented above.

Staff is recommending approval of this permit amendment application, as conditioned.

## 1.0 STAFF RECOMMENDATION

### Approval with Conditions

The staff recommends conditional approval of Coastal Development Permit Amendment Application No. E-98-26-A1.

#### Motion:

I move that the Commission approve the proposed amendment to Coastal Development Permit Application No. E-98-26 pursuant to the staff recommendation dated December 21, 2000.

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

**Resolution:**

The Commission hereby approves the coastal development permit amendment on the ground that the development, as amended and subject to conditions, 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 amendment 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.

**2.0 STANDARD CONDITIONS**

See Appendix A.

**3.0 SPECIAL CONDITIONS**

These Special Conditions supplement Special Conditions 1-7 imposed by the Commission in CDP E-98-026. Special Conditions 1-7 remain in full force and effect.

8. **Construction Zone.** Prior to removal of the telephone poles, the applicant shall clearly mark and delineate the limits of the telephone pole removal construction zone, including access corridors. All sand-verbena (*Abronia maritima*) plants shall be avoided, if feasible. No unauthorized personnel or equipment shall be allowed outside the construction limits.
9. **Pre-Disturbance Biological Survey.** Within two weeks before project commencement, the applicant shall photograph the project area for all plant and wildlife species. Prior to commencement of the project, the photographic survey shall be submitted to the Executive Director of the Coastal Commission (hereinafter "Executive Director").
10. **Impacts to the Sand Verbena.** The applicant shall record all damage to or destruction of sand-verbena (*Abronia maritima*) plants caused by project activities. The growth stage of each sand-verbena impacted, date, time, location and activity contributing to the damage or destruction shall be recorded on a daily basis. Within one week of project completion, the applicant shall submit to the Executive Director a written report incorporating the above information.
11. **Sand Verbena Restoration Plan.** If project activities result in any damage to or destruction of the sand verbena (*Abronia maritima*), recorded pursuant to Special Condition 10, the applicant shall submit within 30 days of project completion a sand-verbena restoration plan in the form of an application to amend CDP E-98-026.

## 4.0 FINDINGS AND DECLARATIONS

The Commission finds and declares as follows:

### 4.1 Project Background

In September 1999, the Coastal Commission granted to Chevron Coastal Development Permit E-98-026 in part to remove (a) five anodes buried under the beach formerly used for cathodic protection of the offshore pipelines and (b) several pier pilings embedded in sand where a pier formerly crossed the beach as a part of the decommissioning of its Estero Marine Terminal. These activities are referred to by the applicant as "Phase 3" abandonment activities. Chevron was also permitted to remove offshore loading hoses, buoys, anchors, and chains, and abandon in place three out-of-service offshore pipelines, a mooring anchor, and two telephone cables. The latter activities were completed this year.

The southern staging area and access route was not analyzed in CDP E-98-026 and is therefore proposed for use as part of this permit amendment. Chevron further proposes to remove from the beach four telephone poles and associated wire. Removal of the anodes and pier pilings requires the lowest possible tides to access the lowest areas of the beach. The original proposed Phase 3 work was anticipated to commence in November 2000, which did not occur, and continue into February 2001. Moreover, the Army Corps of Engineers has limited Phase 3 abandonment activities to January and February (to avoid the snowy plover nesting season) which coincides with only four minus tide cycles.<sup>1</sup> As a consequence, if weather is unfavorable during a minus tide event, it may not be possible to complete all Phase 3 tasks within the restricted time frame. Therefore, the applicant is proposing to use night lighting, if necessary.

### 4.2 Description of Proposed Material Amendment

This proposed amendment to CDP E-98-026 encompasses three additional activities: (a) the use of a staging and access area south of Toro Creek and directly across from Highway 1; (b) removal of four telephone poles and associated wires north and south of Toro Creek, 20-100 feet west of Highway 1 and; (c) the use of night lighting on the beach areas to support Phase 3 abandonment activities, if necessary.

#### *Staging Area*

Chevron will use a disturbed fenced area of approximately 0.5 acres on the bluff above the beach and across from Highway 1 as a staging area for Phase 3 abandonment activities and for the

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<sup>1</sup> The U.S. Army Corps of Engineers ("ACOE") has restricted Phase 3 abandonment operations to January and February 2001. In addition, the ACOE permit prohibits operation of equipment within Toro Creek. Since Toro Creek is currently spilling and will likely spill into the ocean during January and February, Chevron will not be able to access two of the anodes and telephone poles located north of Toro Creek using the southern access route approved by the State Lands Commission. Thus, Chevron wishes to use a second staging area and access route north of the creek. This area, however, is not within the Commission's retained permit jurisdiction but lies within San Luis Obispo County's certified Local Coastal Program permitting jurisdiction. The County is currently reviewing a request from the applicant to use the proposed staging and access area north of Toro Creek.

telephone removal work. Trucks and equipment (e.g., backhoe, tracked crane, excavator, front end loader, dump truck, flat bed truck) will access the beach through this staging area, which used to be a pier bulkhead and where a spill response trailer currently resides. Access to the beach will occur on an existing vehicle route paralleling the fence along the Highway 1 right-of-way. Approximately 10 cubic yards of sand will be used to even the contour of the accessway as it approaches the beach. The applicant is proposing to leave the sand in place and allow natural forces to erode or recontour the area. The anodes, pier pilings, and telephone poles and wires recovered from the beach and bluff areas will be stored at this staging area until they are removed for salvage or disposal.

### ***Telephone Poles***

Four telephones poles, previously not identified for removal, strung with several strands of wire are proposed to be removed during the Phase 3 abandonment work. The poles and wires are associated with an inoperable cathodic protection system for the marine terminal's former offshore oil pipelines. The wires are not connected to any operational equipment. They extend approximately ½ mile north of the staging area described above and roughly 50 feet seaward of Highway 1. Two poles are located north of Toro Creek (Middle Pole Removal Area) and two poles are located south of the creek (Southern Work/Access Area) (Exhibit 2).

Removal of the poles and wires will entail the following activities: (a) cutting the poles near ground level with a chain saw, and (b) pulling the sunk portion of the poles up with an excavator. The poles and wires will be recycled or disposed of consistent with all regulatory requirements. The poles are approximately 1.5 feet in diameter buried roughly 6-8 feet deep. After removal, the resulting excavation will be filled in by slumping soil and with nearby sand to the same level as the surrounding topography. This work is expected to take two days.

### ***Night Lighting***

There are typically two low tide cycles with minus tides in any month lasting for roughly five to seven days during which the above described work can most readily be accomplished. The lowest tides from November to February occur in the afternoons with each successive minus tides taking place approximately half an hour later than the ones the day before. In the event that project activities are slowed due to inclement weather, or if an abandonment activity is nearly complete by sunset, Chevron proposes to use night lighting, only if necessary, so as to enable completion of all Phase 3 abandonment work in January and February.

The applicant proposes to use two 4 kilowatt self-contained light standards, wheel-mounted diesel powered generators with extendable arms on which lights are attached. The light intensity will be minimized to the level necessary to accomplish abandonment activities and will be directed away from Highway 1 in accordance with California Department of Transportation requirements. Night lighting will be limited to no more than three hours per night. A maximum total of 24 hours of lighting is expected to be used over up to four periods roughly two weeks apart.

### **4.3 Other Agency Approvals**

#### **4.3.1 U.S. Army Corps of Engineers ("ACOE")**

On August 3, 2000, the ACOE issued the applicant conditional Nationwide 12 and 18 permits (199915811-TW), pursuant to § 404 of the Clean Water Act and § 10 of the Rivers and Harbors Act, for the work authorized in CDP E-98-026. On September 21, 2000, the ACOE, in consultation with the National Marine Fisheries Service, modified these permits at the request of the applicant to incorporate the proposed changes to the originally approved project and allow abandonment work to occur through February 2001. The ACOE determined that the proposed changes would not result in an effect to listed species, critical habitat or federally managed species that were not previously considered.

Pursuant to § 307(c)(3)(A) of the Coastal Zone Management Act, any applicant for a required federal permit to conduct an activity affecting any land or water use or natural resource in the coastal zone must obtain the Coastal Commission's concurrence in a certification to the federal permitting agency that the project will be conducted in a manner consistent with the California Coastal Zone Management Program. The Commission's action on this permit amendment application shall comprise its federal consistency review for Chevron's proposed project modifications.

#### **4.3.2 California State Lands Commission ("SLC")**

On June 14, 1999, the State Lands Commission ("SLC") approved the overall abandonment of the Estero Marine Terminal by taking the following actions: (1) certified the Mitigated Negative Declaration for the Estero Bay Marine Terminal Partial Abandonment and Interim Lease in accordance with the California Environmental Quality Act (CEQA), (2) adopted the Mitigation Monitoring Program, (3) approved the termination of the State Tide and Submerged Lands Lease PRC 2478.1, pursuant to a lease termination agreement, for the marine terminal site, and (4) approved a five-year, interim lease for the two pipelines and the outfall line proposed to be left in place for possible reuse.

The activities proposed in this permit amendment application will not require approval by the SLC. Its staff, however, will review the Phase 3 Execution Plan, which includes the proposed activities that are the subject of this permit amendment request.

#### **4.3.3 County of San Luis Obispo**

Because the applicant's Army Corps of Engineers permit prohibits work within the Toro Creek, which is spilling into the ocean, the applicant is seeking to use another staging and access area in order to excavate anodes that are located north of Toro Creek. This staging and access area, directly west of the intersection of Highway 1 and Toro Creek Road, lies within San Luis Obispo County's certified Local Coastal Program permitting jurisdiction. The County is currently reviewing a request from the applicant to use the proposed staging and access area north of Toro Creek.

#### 4.4 Coastal Act Issues

##### 4.4.1 Marine Resources, Water Quality, and Environmental Sensitive Habitat Areas

Coastal Act § 30230 states:

*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.*

Coastal Act § 30231 states in part:

*The biological productivity and the quality of coastal waters... appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored...*

Coastal Act § 30240 states in part:

*(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 those areas, and shall be compatible with the continuance of those habitat and recreation areas.*

Coastal Act § 30107.5 defines "environmentally sensitive area" to mean:

*"...any area in which plant or animal life or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem and which could be easily disturbed and degraded by human activities and development."*

#### **Red Sand-Verbena**

The proposed pole removal work could potentially impact the red sand-verbena (*Abronia maritima*) plant, which has been documented by the California Native Plant Society as a species of limited distribution. The red sand-verbena is a fleshy herbaceous perennial that grows in prostrate mats on well developed beach dunes (Reiser, 1994). Its distribution extends from San Luis Obispo County south to Baja California and exists optimally on semi-stabilized dunes away from heavy human foot traffic. The red sand-verbena has been severely impacted by recreational beachgoers along California beaches and thus is in substantial decline in coastal southern California.

Based on a November 1, 2000 survey of the proposed project site, the applicant documented sand-verbena at the Middle Pole Removal Area and the Southern Work/Access Area. In the former area, several clumps of sand-verbena inhabit a sandy area at the base of a steep, eroded

cliff. At the latter area, approximately 5 sand-verbena plants occurs individually and interspersed with other native and non-native vegetation and is more prevalent on the seaward side of the dune faces, though clumps do occur within the dominant iceplant (*Carpobrotus edulis*) that anchors the dunes. No sand-verbena is located within the Staging Area, at the access gate, or in the equipment access route.

After a December 18, 2000 site visit, the applicant has concluded that all sand verbena plants can be avoided during project operations. At the Southern Work/Access Area, no sand verbena is located at or near the southern-most pole (#1), which can be accessed from either south or north of the Staging Area. No sand-verbena exists near the northern pole (#2). However, sand-verbena is present along the west side of the access corridor. At the Middle Pole Removal Area, no sand-verbena is located near the southern pole (#3). It would be accessed from the Highway 1 shoulder using an existing ramp, avoiding 1-2 plants located roughly 25 feet away. The northern-most pole (#4) is entirely surrounded by iceplant and would also be accessed from the Highway 1 shoulder.

The applicant has committed to implementing sand-verbena avoidance measures when removing the telephone poles. At all times during the pole removal work, a qualified biologist will be onsite monitoring work activities to ensure that no loss of sand-verbena occurs. An independent biological monitor required by State Lands Commission's Mitigation Monitoring Program will also be onsite. Prior to the removal work, access corridors without the presence of sand-verbena will be established by the biologist. The applicant will use these corridors exclusively. The sand-verbena plant located along the west side of the access corridor for pole #2 will be flagged for avoidance. Moreover, the applicant will train all personnel and contractors to identify and avoid the sand-verbena.

Additionally, **Special Condition 9** requires that within two weeks before project commencement, the applicant shall photograph the project area for all plant and wildlife species. Prior to commencement of the project, the photographic survey shall be submitted to the Executive Director of the Coastal Commission. **Special Condition 8** requires that prior to removal of the telephone poles, limits of the telephone pole removal construction zone, including access corridors, be clearly marked and delineated in the field. All sand-verbena plants are to be avoided, if feasible. No unauthorized personnel or equipment shall be allowed outside the construction limits.

Since unanticipated impacts to the sand-verbena could occur, **Special Condition 10** requires the applicant to record any damage to or destruction of sand-verbena plants caused by project activities. The growth stage of each sand-verbena impacted, date, time, location and activity contributing to the damage or destruction shall be recorded on a daily basis. Within one week of project completion, the applicant shall submit a written report to the Executive Director incorporating the above information. **Special Condition 11** requires that if project activities result any damage to or destruction of the sand verbena, recorded pursuant to Special Condition 10, the applicant shall submit within 30 days of project completion a sand-verbena restoration plan in the form of an application to amend CDP E-98-026.



### ***Toro Creek***

The proposed pole removal work will take place adjacent to Toro Creek, an area, including 100 foot buffers on either side of the creek, designated by the City of Morro Bay as an environmental sensitive habitat area ("ESHA"). Toro Creek provides foraging and breeding habitat for steelhead fish, a federally threatened anadromous species and the tidewater goby, a federally listed endangered species.

Hazardous materials could leak from construction equipment (*e.g.*, excavator, dump truck, backhoe) and flow into and impact marine organisms within Toro Creek or groundwater. The applicant is proposing measures to minimize this potential impact including the placement of an impermeable barrier under construction equipment to insure that leakage of fuel, oil, or hydraulic fluid, if any, does not contact the ground. Equipment will also be inspected for leakage every day and no leaking equipment will be used on the beach. Drip pans will be positioned under fuel tanks and fluid reservoirs to confine any leaks that occur while equipment is idle and to assist in identifying slow leaks. Leaks will be repaired or the equipment will be replaced.

### ***Night Lighting***

The federally listed threatened western snowy plover nests on the sandy beach at the marine terminal. Recent surveys of the beach area at the terminal identified several active and abandoned snowy plover nests between 500 feet north of the mouth of Toro Creek and 200 feet south of the former pier bulkhead. California grunion spawn on Morro Strand State Beach, located north and south of the marine terminal, from April through August.

The proposed use of lights during nighttime abandonment activities will occur outside the snowy plover nesting season (March through September) and outside the grunion spawning season (April through August). Given this timeframe, the ACOE, in consultation with the U.S. Fish and Wildlife Service, does not believe the lighting presents any threat of harm or disturbance to sensitive species (Welch, 2000). Similarly, the Commission's staff biologist concurs with this determination.

### ***Conclusion***

With the imposition of Special Conditions 8, 9, 10, and 11, the Commission finds that the proposed permit amendment will be carried out in a manner that will sustain the biological productivity of coastal waters and that will maintain healthy populations of all potentially affected species of marine organisms in conformity with the requirements of Coastal Act § 30230. Additionally, the proposed permit amendment has been designed to prevent impacts which would significantly degrade Toro Creek, and is compatible with the continuance of its habitat and recreation areas consistent with the requirements of Coastal Act § 30240(b).

#### 4.4.2 Public Access and Recreation

Coastal Act § 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.*

Coastal Act § 30220 states:

*Coastal areas suited for water-oriented recreational activities that cannot be readily provided at inland water areas shall be protected for such uses.*

Chevron owns approximately 1 mile of beach frontage between the northern and southern units of Morro Strand State Beach. The two loading lines for the terminal offshore berths and the treated wastewater outfall, as well as cathodes and anodes, are buried beneath this section of beach. The telephone poles and wires proposed for removal are located on bluff areas or above the beach on either side of Toro Creek approximately 50 feet seaward of Highway 1.

The public formally accesses this beach via the State park units north and south of the Chevron property. The nearest formal vertical access way to the south is through the North Point subdivision in north Morro Bay into the southern unit of Morro Strand State Beach, approximately 0.5 mile south of Toro Creek. The nearest formal vertical access way to the north is off Studio Drive at Cody Drive in Cayucos into the northern unit of Morro Strand State Beach, approximately 0.5 mile north of Toro Creek. From Cayucos to Morro Bay, there are approximately 30 vertical access points from public streets into the 6.1 miles of beach. According to the Department of Parks and Recreation, an average of 231 and 280 visitors per day recreated at Morro Strand State Beach last January and February. Although there are no formal vertical access ways from Highway 1 directly across Chevron property to the beach, people cross Chevron property to the beach through several informal parking areas (along the shoulder of Highway 1) and vertical access ways along Highway 1. Beachgoers most frequently use an access area across from Toro Creek Road and another from the Southern Staging Area. Chevron facilities do not obstruct informal vertical access, but the Caltrans fence along Highway 1 impedes access. People access the beach through holes or separations in the fence.

During the pole removal work, both informal access points will be temporary closed for a total of approximately 2 hours each when equipment and recovered material need to be moved. This closure may occur during a weekend. However, the applicant has agreed to keep one accessway open to the public when the other is closed. Chevron personnel, its contractors, or monitors will direct beach users to the open accessway.

Pole removal work will result in a minor disturbance to coastal access and recreation in the immediate project area. However, due to the short-term nature of the disturbance and the

availability to the public of one informal accessway at the project site, the Commission finds that the proposed project is consistent with Coastal Act § 30211 and 30220.

#### **4.5 California Environmental Quality Act ("CEQA")**

Section 13096 of the Commission's administrative regulations requires Commission approval of CDP applications to be supported by a finding showing the application, as modified 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 the CEQA prohibits approval of a proposed development if there are feasible alternatives or feasible mitigation measures available that would substantially lessen any significant impacts that the activity may have on the environment.

The project as conditioned herein incorporates measures necessary to avoid any significant environmental effects under the Coastal Act, and there are no less environmentally damaging feasible alternatives. Therefore, the Commission finds that the proposed project is consistent with the resource protection policies of the Coastal Act and with the CEQA.

## APPENDIX A STANDARD CONDITIONS

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

**APPENDIX B**  
**SUBSTANTIVE FILE DOCUMENTS**

*Coastal Development Permit Application Materials*

Application for Coastal Development Permit E-98-026-A1 dated November 15, 2000, as amended.

*Other*

Marks, Sorrell. 2000. Personal Communication. Central Coast Regional Water Quality Control Board. San Luis Obispo, CA.

Welch, Tiffany. 2000. Email to Dan Chia, California Coastal Commission. U.S. Army Corps of Engineers. Ventura, CA.

Reiser, Craig. 1994. *Rare Plants of San Diego County*.  
(<http://www.sierraclub.org/chapters/sandiego/rareplants/>)



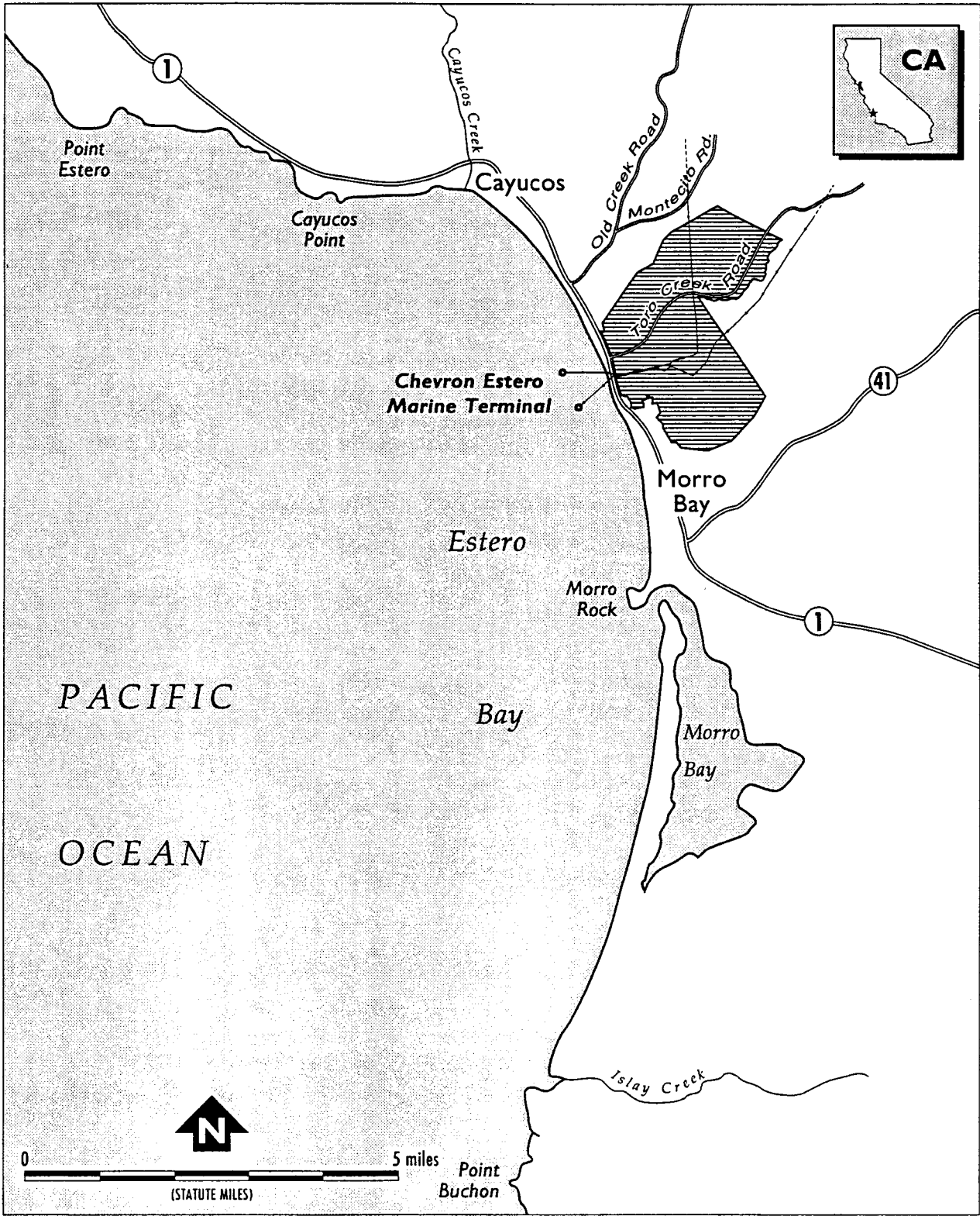


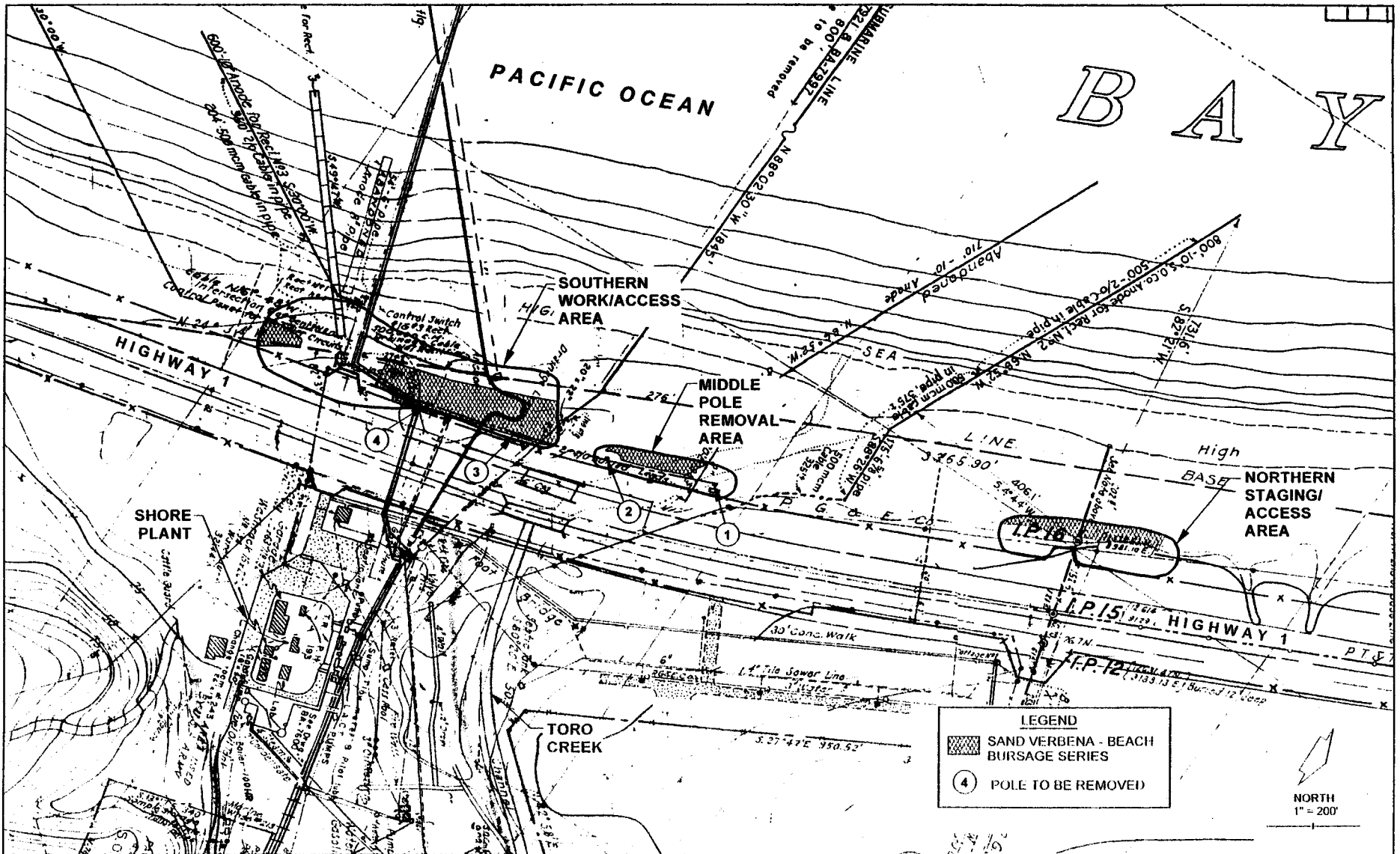
Figure 2-1

**Project Location Map**

**EXHIBIT NO. 1**

**APPLICATION NO.**

**E-98-026-A1**



**DISTRIBUTION OF SAND VERBENA - BEACH BURSAGE SERIES WITHIN POLE REMOVAL IMPACT AREAS**  
**FIGURE 1**

**EXHIBIT NO. 2**  
**APPLICATION NO.**  
 E-98-026-A1

Pole Removal