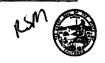
CALIFORNIA COASTAL COMMISSION

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RECORD PACKET COPY

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Date Filed:

October 2, 2001

49th Day:

November 11, 2001

180th Day:

March 31, 2002

Staff: Staff Report: Tiffany S. Tauber

October 26, 2001

Hearing Date:

November 14, 2001

Commission Action:

STAFF REPORT: REGULAR CALENDAR

APPLICATION NO.:

1-01-048

APPLICANT:

Cal-Pacific Carbon

AGENT:

Jeff Laikam, Whitchurch Engineering

PROJECT LOCATION:

555 South Depot Road, Fields Landing, Humboldt County

(APN 307-101-01 & 306-221-07)

PROJECT DESCRIPTION:

Construction of a 5,450-square-foot, 16-foot-high, metal

storage warehouse and three approximately 45-foot-high

storage silos, grading, paving, and landscaping.

GENERAL PLAN

DESIGNATION:

Industrial/Coastal Dependent, Industrial General (MC/MG)

ZONING DESIGNATION:

Industrial/Coastal Dependent, Industrial General (MC)

LOCAL APPROVALS RECEIVED:

None Required

OTHER APPROVALS REQUIRED:

None

SUBSTANTIVE FILE DOCUMENTS:

(1) Humboldt County Local Coastal Program; (2)

CDP No. 1-96-066-W; (3) CDP No. 1-96-033-W

SUMMARY OF STAFF RECOMMENDATION:

Staff recommends <u>approval</u> with conditions of the coastal development permit application submitted by Cal-Pacific Carbon for the proposed construction of a storage warehouse and three additional storage silos at the existing carbon processing facility at South Depot Road in Fields Landing. The staff further recommends that this approval be subject to special conditions that ensure the protection of coastal water quality and ensure that the development is safe from geologic hazards.

To address water quality concerns and ensure consistency with Sections 30230 and 30231 of the Coastal Act, staff is recommending Special Condition No. 1 requiring the applicant to submit a revised final runoff control plan, for the review and approval of the Executive Director, to ensure that the proposed drainage improvements and Best Management Practices are sufficient to effectively treat site runoff that drains to existing drainage ditches that lead to Humboldt Bay.

Furthermore, to ensure that the proposed new development is constructed to minimize risks from geologic hazards, the Commission attaches Special Condition No. 2 which requires all final design and construction plans, including foundations, grading and drainage plans, to be consistent with all recommendations contained in the soils report submitted by the applicant. The condition requires that prior to the issuance of the coastal development permit, the applicant submit, for the Executive Director's review and approval, evidence that an appropriate licensed professional has reviewed and approved all final design and construction plans and certified that each of those final plans is consistent with all of the recommendations specified in soils report.

As conditioned, staff believes that the project is fully consistent with the Chapter 3 policies of the Coastal Act.

STAFF NOTES:

1. Standard of Review

The proposed project is located in Humboldt County. Humboldt County has a certified LCP, but the portion of the project that is the subject of Coastal Development Permit No. 1-01-048 is located within an area shown on State Lands Commission maps over which the state retains a public trust interest. Therefore, the site is within the Commission's retained jurisdiction and the standard of review that the Commission must apply to the project is the Chapter 3 policies of the Coastal Act.

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. 1-01-048 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. 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 Attachment A.
- III. SPECIAL CONDITIONS:
- 1. Final Revised Runoff Control Plan
- A. PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicant shall submit, for the review and written approval of the Executive Director, a final revised runoff control plan that substantially conforms with the plan submitted to the Commission titled "Preliminary Site/Grading Plan" dated August 23, 2001 and revised October 2, 2001 except that:
 - 1. The runoff control plan shall demonstrate that:
 - a. Runoff from the approved storage warehouse and surrounding paved area shall be collected and discharged through a filter. The filter shall be designed to filter

stormwater runoff from each storm, up to and including the 85th percentile, 1-hour storm event.

- b. The existing drainage inlet to the north of the storage silos that collects runoff from the paved area under the silos shall be equipped with a filter. The filter shall be designed to filter stormwater runoff from each storm, up to and including the 85th percentile, 1-hour storm event.
- c. The filters shall be capable of filtering oil and grease and be appropriately sized to filter the powdered carbon.
- 2. The plan shall include, at a minimum, the following components:
 - a. a schedule for installation and maintenance of the filters; and
 - b. specifications for the proposed filters demonstrating that the filters will conform to the above requirements.
- B. The permittee shall undertake development in accordance with the approved final revised plan. Any proposed changes to the approved final revised plan shall be reported to the Executive Director. No changes to the approved final revised plan shall occur without a Commission amendment to this coastal development permit unless the Executive Director determines that no amendment is required.

2. Conformance of Design and Construction Plans to Soils Report

- All final design and construction plans, including foundations, grading and drainage plans, shall be consistent with all recommendations contained in the Conclusions and Recommendations section of the Engineering Geologic Reports prepared by Terry O'Reilly of Whitchurch Engineering and dated August 17, 2001. PRIOR TO THE ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicant shall submit, for the Executive Director's review and approval, evidence that an appropriate licensed professional has reviewed and approved all final design and construction plans and certified that each of those final plans is consistent with all of the recommendations specified in the above-referenced geologic evaluation approved by the California Coastal Commission for the project site.
- 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 required.

IV. FINDINGS AND DECLARATIONS:

The Commission hereby finds and declares:

1. Site & Project Description

The proposed project site encompasses two parcels located off of South Depot Road in Fields Landing, south of Eureka in Humboldt County (Exhibit Nos. 1 & 2). The site is located approximately 1,000 feet east of Humboldt Bay in an industrial area of Fields Landing. The parcel located to the southeast of the site is developed with several industrial structures and the majority of the parcels to the east of the site are developed with single family residences.

The proposed project involves additions to an existing industrial carbon-processing facility. The existing facility processes raw waste material from local wood processing facilities into powdered activated carbon, which is packaged and shipped to municipalities across the country for taste and odor control in drinking water. The proposed project involves the construction of a new warehouse on the parcel directly adjacent to the existing processing facilities. The structure would be used for warehousing packaged carbon generated from the existing Cal-Pacific Carbon processing site located to the west of the subject parcel. The proposed project also involves the addition of three new storage silos to the existing five silos located at the existing facilities.

More specifically, the proposed project involves the construction of (1) a 5,450-square-foot, 16-foot-high metal storage structure and (2) addition of three new approximately 45-foot-high storage silos adjacent to the five existing silos originally approved under Coastal Development Permit Waiver No. 1-96-066W. The storage structure and silos would be of similar design, size, and materials as the existing facilities. The proposed project also involves approximately 4,500 square feet of new paving, placement of 552 cubic yards of river run gravel, drainage improvements, and landscaping. (see Exhibit Nos. 3-6)

The parcel where the proposed warehouse would be constructed is currently vacant, void of vegetation, and partially paved and partially graveled. There are no environmentally sensitive habitat areas located at the site and the proposed project would not involve major vegetation removal. The site is essentially flat with an elevation of approximately ten feet above mean sea level. A set of railroad tracks runs north and south through the property approximately ten feet east of the west property line and another set of tracks run north and south through the property 70 to 85 feet west of the eastern property line.

The site where the three new silos would be constructed is a paved area adjacent to the existing five silos. There is no environmentally sensitive habitat at this site and the building area is essentially flat.

2. Locating and Planning New Development

Section 30250(a) of the Coastal Act states that new development shall be located within or near existing developed areas able to accommodate it or in other areas with adequate public services and where it will not have significant adverse effects, either individually or cumulatively, on coastal resources. The intent of this policy is to channel development toward more urbanized areas where services are provided and potential impacts to resources are minimized.

The proposed development is located within the unincorporated town of Fields Landing in an area developed with industrial uses and single-family residences. The proposed expansion of an existing industrial use is consistent with the general industrial plan and zoning designation at the subject site. The parcel is served by community water and sewer and the proposed development would not result in a significant increased burden on theses services. As discussed in Findings No. 3 & 4 below, the proposed development has been conditioned to protect coastal water quality and to protect the development from geologic hazards.

Therefore, the Commission finds that the proposed development is consistent with Coastal Act Section 30250(a) in that it is located in a developed area, it has adequate water and sewer capability to accommodate it, and it will not cause significant adverse effects, either individually or cumulatively, to coastal resources.

3. Water Quality

Sections 30231 and 30230 of the Coastal Act address the protection of coastal water quality and marine resources in conjunction with development and other land use activities. 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 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 substantial 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)

Section 30230 of the Coastal Act 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.

Sections 30230 and 30231 of the Coastal Act require that the biological productivity and the quality of coastal waters be maintained and, where feasible, restored through among other means, minimizing adverse effects of wastewater discharge and entrainment, and controlling runoff.

The subject site is located approximately 1,000 feet east of Humboldt Bay in an industrial area of Fields Landing. The principal potential water quality impact of the proposed development would be the entrainment of any spilled powdered carbon produced and stored at the site within stormwater runoff and any resulting downstream impacts on Humboldt Bay. The powdered carbon would not result in a chemically adverse water quality impact if it were to become entrained in runoff and enter surface waters. Rather, the fine, powdered nature of the carbon could result in an adverse water quality impact in the form of increased sedimentation. The applicant has indicated that the likelihood of significant amounts of powdered carbon to be present on the paved areas of the site is minimal, as it is packaged at the adjacent facilities and would be contained when it is trucked to the new storage warehouse. The carbon would generally only be dispersed on site if the packaging were punctured or torn during transport. The proposed development would not result in an increase in the number of employees and the proposed paved areas would not be used for increased parking. Therefore, the proposed development would not significantly increase the amount of oil and grease that could be entrained in runoff beyond that associated with the trucks and equipment that would be operating at the site to transport the packaged carbon from the existing site to the proposed warehouse.

The building site for the proposed storage warehouse is currently vacant, but is partially paved and partially graveled. The proposed project involves the construction of a 5,450-square-foot storage structure and approximately 4,500 square feet of new paving for a total of 10,518 square feet of pavement at the site, thereby resulting in an increase in impervious surface area at the site. Currently, site drainage is directed toward an existing 8-inch-diameter storm drain pipe located under the railroad tracks to the east of the proposed location of the new warehouse. This existing drainage pipe is in disrepair and does not function properly. The applicant has submitted a preliminary site grading and drainage plan that illustrates the proposed drainage improvements (Exhibit No. 3). The proposed drainage improvements include the construction of a concrete drainage swale around the perimeter of the building that would direct site and roof runoff toward a proposed new 12-inch-diamter, 14-foot-long drainage pipe located to the east of the building. The proposed drainage pipe would slope at a 2% grade and extend underneath the railroad tracks to an existing grassy swale that drains toward an existing tidally influenced drainage ditch that leads to Humboldt Bay. The applicant is proposing to install an oil/water separator at the inlet to the drainage pipe and a rock energy dissipater at the outlet of the pipe to prevent erosion. The applicant states that the oil/water separator would allow any powdered carbon from the storage facility to settle out.

The site where the three additional storage silos are proposed to be constructed currently drains to an existing drainage inlet that flows to an adjacent drainage ditch and toward Humboldt Bay. The northern end of the existing carbon processing facility where the five existing silos are

located and three new silos are proposed is the primary area at the existing facility where carbon materials are loaded and unloaded from trucks and the storage silos (Exhibit Nos. 5 & 6). This area is contained by an existing concrete berm that directs drainage toward the northern drainage inlet. Currently, there is no permanent filter device at this drainage inlet.

As discussed above, the applicants have proposed some general best management practices to minimize adverse impacts to water quality from the proposed development including the installation of an oil/water separator at the proposed drainage inlet at the warehouse building site. However, the applicant has not provided information to demonstrate that an oil/water separator is adequate to effectively filter the carbon and allow it to settle once it becomes suspended in water and therefore, it is not clear that the proposed structural BMP is adequate to treat runoff from the site prior to reaching coastal waters. Furthermore, the applicant has not proposed additional best management practices at the location of the proposed three new storage silos. The proposed addition of three new storage silos to the five silos at the existing facility would result in the potential for more carbon materials to be dispersed or spilled on the site as it is transferred to and from trucks and the storage silos, thus increasing the amount of carbon material that could potentially become entrained in site runoff.

Therefore, to ensure that site runoff is adequately treated prior to draining to Humboldt Bay, the Commission attaches Special Condition No. 1, which requires the applicant to submit for the review and approval of the Executive Director, a revised final runoff control plan. Special Condition No. 1 requires the revised runoff control plan to provide for the installation of a filter capable of capturing oil and grease that is adequately sized to filter the powdered carbon at the proposed new drainage inlet at the storage warehouse building site and at the existing northern drainage inlet near the location of the three new proposed storage silos.

Critical to the successful function of post-construction treatment Best Management Practices (BMPs) in removing pollutants in stormwater to the maximum extent practicable is the application of appropriate design goals for sizing BMPs. The majority of runoff is generated from small storms because most storms are small. Additionally, stormwater runoff typically conveys a disproportionate amount of pollutants in the initial period that runoff is generated during a storm event. Designing BMPs for the small more frequent storms, rather than for the large infrequent storms, results in optimal BMP performance at lower cost. ¹

The Commission finds that sizing the proposed post-construction structural BMPs to accommodate the stormwater runoff from the 85th percentile storm event in this case is equivalent to sizing BMPs based on the point of diminishing returns [i.e. the BMP capacity beyond which, insignificant increases in pollutants removal (and hence water quality protection) will occur, relative to the additional costs]. The proposed storage warehouse and paving would result in an increase of impervious surface area at the site. Both the site of the new warehouse and the site of the new silos do not provide sufficient pervious surface area relative to the size of

¹ [ASCE/WEF, 1998. Urban Runoff Quality Management. WEF Manual of Practice No. 23, ASCE Manual and Report on Engineering Practice No. 87.]

the site and its proximity to the adjacent drainage ditches to provide adequate infiltration during the most significant runoff events. Therefore, Special Condition No. 1 requires that the filters be designed to filter stormwater runoff from each storm, up to and including the 85th percentile, 1-hour storm event.

There are no existing National Pollutant Discharge Elimination System (NPDES) permits that apply to the site and the proposed project does not require any permits from the Regional Water Quality Control Board. Therefore, conditions and/or BMPs required by the Commission to minimize adverse impacts to water quality from the proposed development would not conflict with actions of the RWQCB consistent with the requirements of Coastal Act Section 30412 which prevent the Commission from modifying, adopting conditions, or taking any action in conflict with any determination by the State Water Resources Control Board or any California regional water quality control board in matters relating to water quality.

The Commission finds it necessary to require the utilization of Best Management Practices to minimize significant adverse impacts to the biological productivity and water quality of Humboldt Bay consistent with the water quality protection policies of the Coastal Act and has conditioned the project accordingly. Therefore, as conditioned, the Commission finds that the proposed project is consistent with Sections 30230 and 30231 of the Coastal Act.

3. Geologic Hazards

Coastal Act Section 30253 requires in applicable part that new development minimize risks to life and property in areas of high geologic hazard and that new development assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area.

The applicant has submitted a soils report for the site prepared by a registered professional engineer. According to the Humboldt County General Plan geological map, the subject parcel is at risk of liquefaction. According to the report, liquefaction occurs when loose, saturated, granular soil deposits lose a significant portion of their shear strength due to pore water pressure buildup resulting from cyclic loading, such as that caused by an earthquake. Among the other effects, liquefaction can result in densification of such deposits after an earthquake as excess pore pressures are dissipated (and hence settlements of overlying deposits). The primary factors deciding liquefaction potential of a soil deposit are (1) the level and duration of seismic ground motions; (2) the type and consistency of the soils; and (3) the depth to groundwater. The subject site has been established as being within a seismically active zone. The ground water height at the location of the project site is low (approximately 6-7'). The native sand, sandy clays and clayey sands are well graded, indicating that the particle size varies throughout each layer of the soil strata which reduces the possibility of liquefaction occurring. The soil report states, "As a mitigation measure for the liquefaction potential at the site, we are recommending that a reduced allowable soil bearing pressure be used." The report concludes that the soils are capable of providing adequate support for the proposed development assuming recommendations set forth in the report regarding foundation construction, grading, and drainage are followed. In

addition to soil bearing pressure recommendations to minimize risk of liquefaction, the recommendations include for example; "benching" areas to receive engineered fill, and directing drainage away from fill and foundation areas.

To ensure that the proposed new development is constructed to minimize risks from geologic hazards, the Commission attaches Special Condition No. 2 which requires all final design and construction plans, including foundations, grading and drainage plans, to be consistent with all recommendations contained in the Engineering Geologic Reports prepared by Terry O'Reilly of Whitchurch Engineering and dated August 17, 2001. Special Condition No. 2 requires that prior to the issuance of the coastal development permit, the applicant submit, for the Executive Director's review and approval, evidence that an appropriate licensed professional has reviewed and approved all final design and construction plans and certified that each of those final plans is consistent with all of the recommendations specified in the above-referenced geologic evaluation.

As conditioned, the Commission finds that the project is consistent with the geologic hazard provisions of Section 30253 of the Coastal Act.

4. 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.

The proposed project is located in an existing industrial area that has been heavily disturbed by past railroad and industrial uses. The proposed building site for the new warehouse is currently a partially graveled and partially paved vacant lot. The subject site does not offer significant views of Humboldt Bay and the proposed new storage warehouse and silos would not block views to or along the bay. Additionally, the warehouse and silos would be consistent with the color, design, materials, and height of the existing adjacent building and silos and thus, would be compatible with the surrounding development (Exhibit Nos. 4 & 5). The three new silos would be sited such that they would not be any more prominent or visible than the existing five storage silos previously approved by the Commission under Coastal Development Permit Waiver No. 1-96-066-W. Furthermore, the site is essentially flat and would not involve significant grading or alteration of natural landforms.

Therefore, the Commission finds that the proposed development is consistent with Section 30251 of the Coastal Act as the development will not block views to and along the coast, will not involve any alteration of land forms, and the proposed demolition activities will not result in any adverse change to the visual character of the waterfront area.

5. Public Access

Section 30210 of the Coastal Act requires that maximum public access shall be provided consistent with public safety needs and the need to protect natural resource areas from overuse. Section 30212 of the Coastal Act requires that access from the nearest public roadway to the shoreline be provided in new development projects except where it is inconsistent with public safety, military security, or protection of fragile coastal resources, or adequate access exists nearby. Section 30211 requires that development not interfere with the public's right to access gained by use or legislative authorization. Section 30214 of the Coastal Act provides that the public access policies of the Coastal Act shall be implemented in a manner that takes into account the capacity of the site and the fragility of natural resources in the area. In applying Sections 30210, 30211, 30212, and 30214, the Commission is also 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 access.

Although the project is located between the first public road and Humboldt Bay, an inlet of the sea, it would not otherwise adversely affect public access. The project site is within an existing industrial area and there are intervening parcels between the subject property and the shoreline. In addition, there are no trails or other public roads that provide shoreline access within the vicinity of the project and therefore, the proposed development would not interfere with existing public access. Furthermore, the proposed project would not create any new demand for public access or otherwise create any additional burdens on public access.

Therefore, the Commission finds that the proposed project does not have any significant adverse effect on public access, and that the project as proposed without new public access is consistent with the requirements of Coastal Act Sections 30210, 30211, 30212, and 30214.

6. California Environmental Quality Act (CEQA)

Section 13096 of the Commission's administrative regulations requires Commission approval of a coastal development permit application to be supported by findings showing that the application, as modified by any conditions of approval, is consistent with any applicable requirement 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 the proposed development may have on the environment.

The Commission incorporates its findings on Coastal Act consistency at this point as if set forth in full. As discussed above, the proposed project has been conditioned to be found consistent with the policies of the Coastal Act. These findings address and respond to all public comments regarding potential significant adverse environmental effects of the project that were received prior to preparation of the staff report. Mitigation measures that will minimize or avoid all

CAL-PACIFIC CARBON 1-01-048 Page 12

significant adverse environmental impact have been required. As conditioned, there are no feasible alternatives or feasible mitigation measures available, beyond those required, which would substantially lessen any significant adverse impact that the activity would 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 and to conform to CEQA.

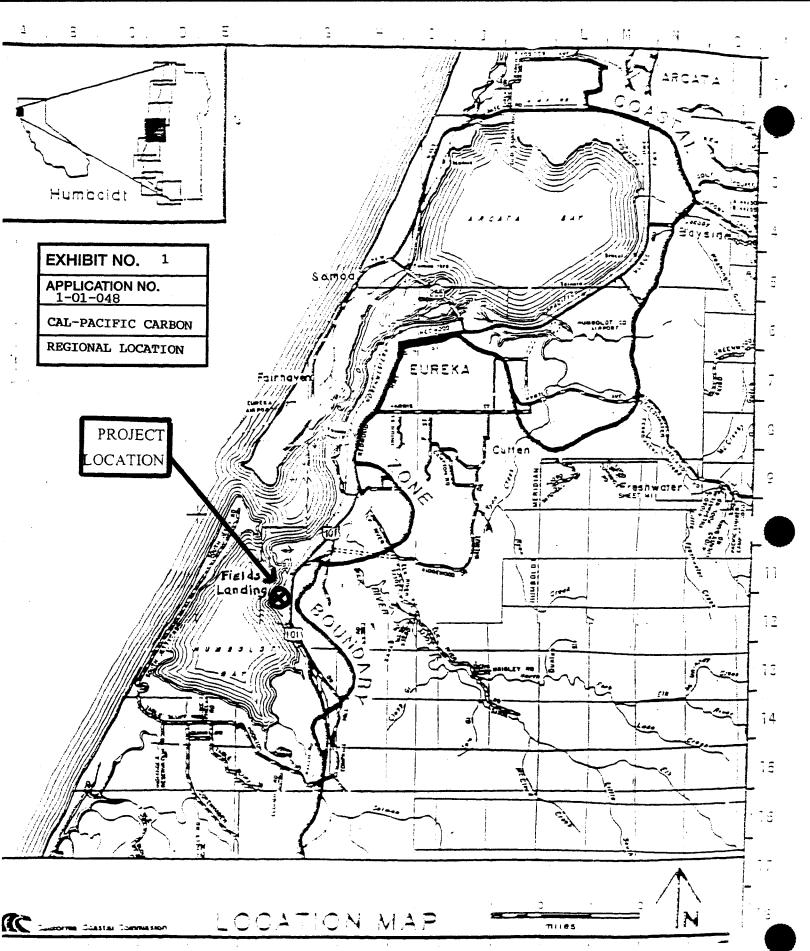
Exhibits:

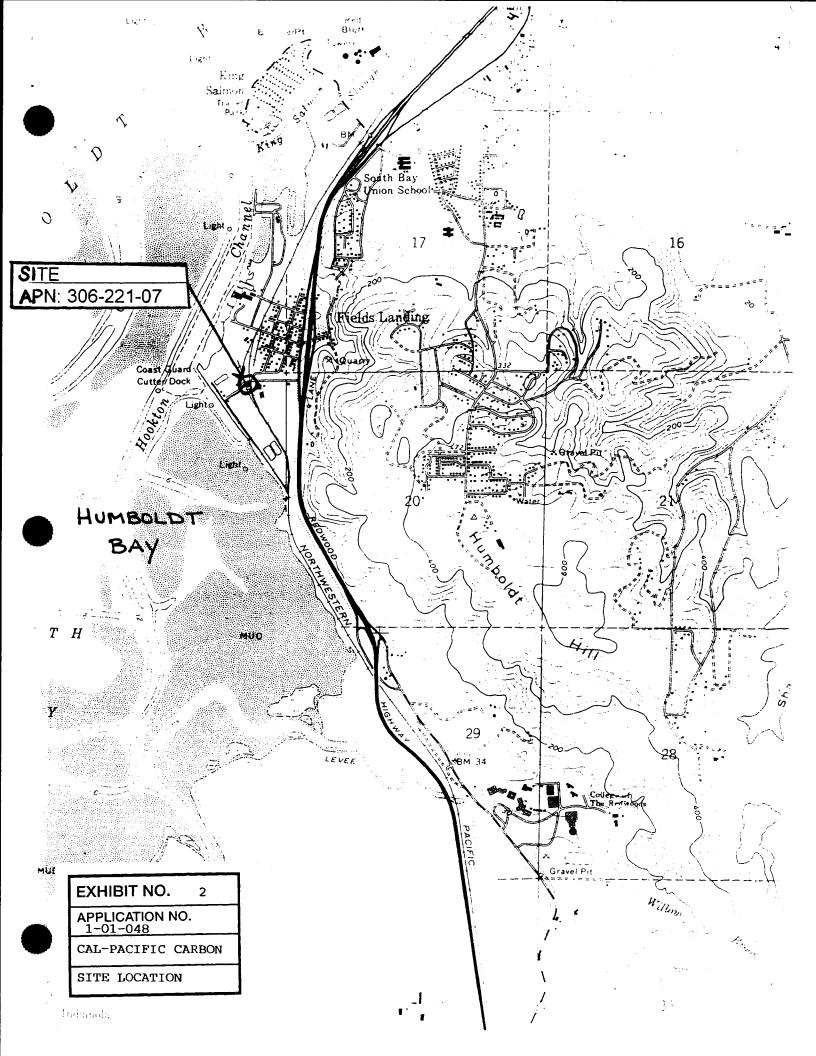
- 1. Regional Location
- 2. Site Location
- 3. Site Plan
- 4. Building Elevations
- 5. Proposed Silos
- 6. Proposed Silo Location

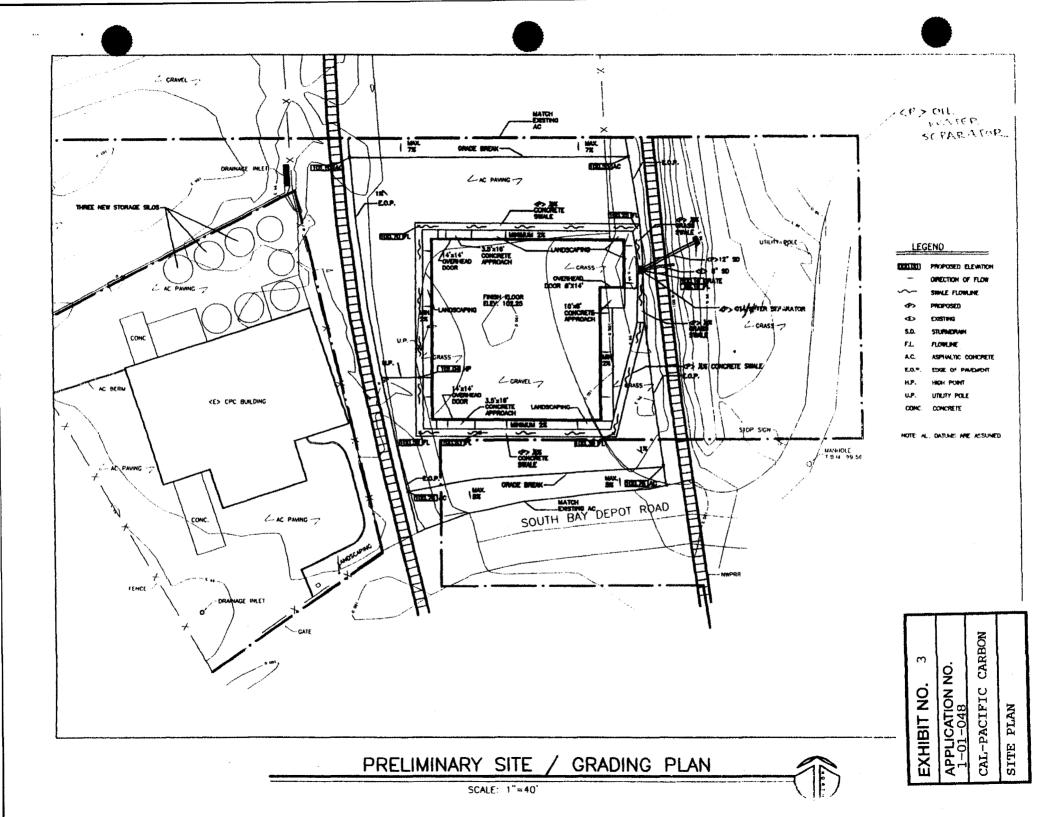
ATTACHMENT A

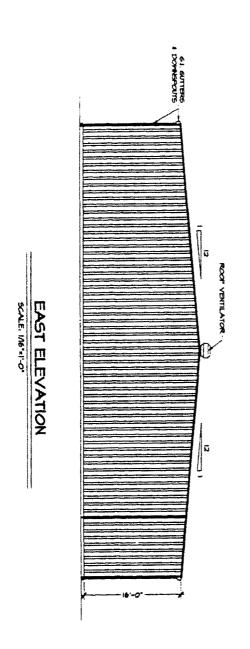
Standard Conditions:

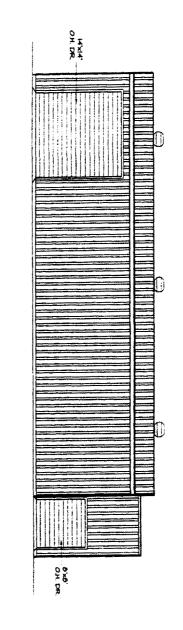
- 1. <u>Notice of Receipt and Acknowledgment</u>. The permit is not valid and development shall not commence until a copy of the permit, signed by the permittee or authorized agent, acknowledging receipt of the permit and acceptance of the terms and conditions, is returned to the Commission office.
- 2. <u>Expiration</u>. 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. <u>Interpretation</u>. Any questions of intent of interpretation of any condition will be resolved by the Executive Director or the Commission.
- 4. <u>Assignment</u>. 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. <u>Terms and Conditions Run with the Land</u>. 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.











SOUTH ELEVATION

APPLICATION NO.
1-01-048

CAL-PACIFIC CARBON

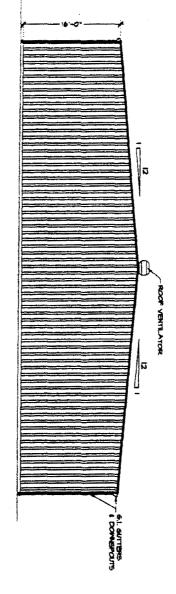
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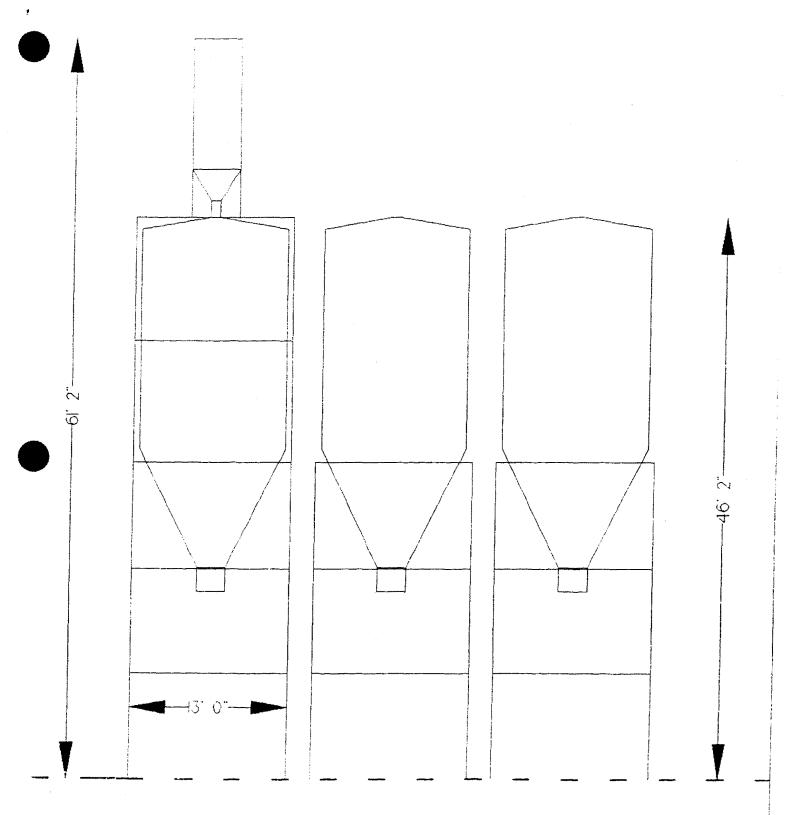
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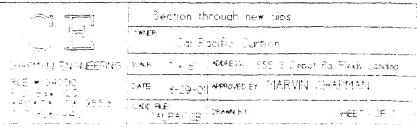
WEST ELEVATION



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PPLICATION NO.
1-01-048
CAL-PACIFIC CARBON
PROPOSED SILOS



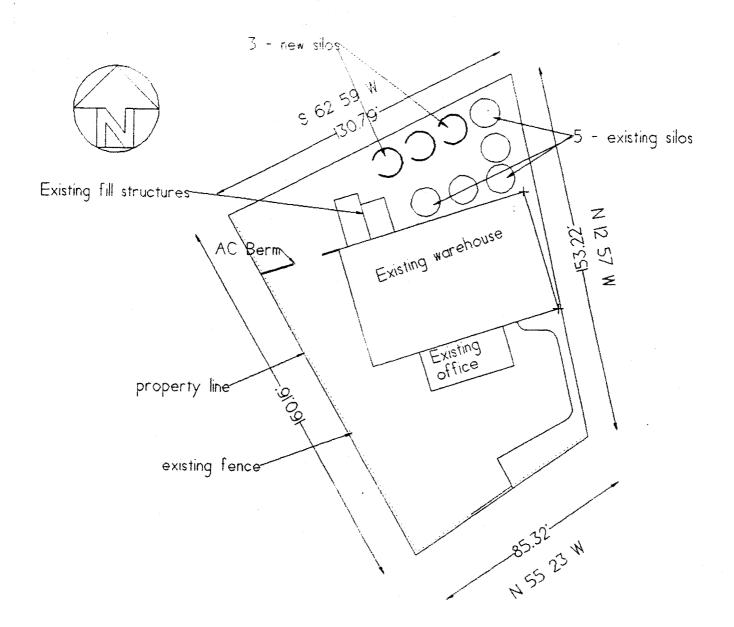


EXHIBIT NO.

APPLICATION NO. 1-01-048

CAL-PACIFIC CARBON

PROPOSED SILO LOCATION

	Plot Plan - AP # 307-101-01
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