

CALIFORNIA COASTAL COMMISSION

ENERGY, OCEAN RESOURCES AND FEDERAL CONSISTENCY DIVISION
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W15

**ENERGY, OCEAN RESOURCES AND FEDERAL
CONSISTENCY DIVISION****DEPUTY DIRECTOR'S REPORT***For the**January Meeting of the California Coastal Commission***MEMORANDUM**

Date: January 11, 2016

TO: Commissioners and Interested Parties

FROM: Alison Dettmer, Energy, Ocean Resources and Federal Consistency Division
Deputy Director

SUBJECT: *Deputy Director's Report*

Following is a listing for the waivers, emergency permits, immaterial amendments, extensions and Negative Determinations issued by the Energy, Ocean Resources and Federal Consistency Division for the January 2016 Coastal Commission hearing. Copies of the applicable items are attached for your review. Each item includes a listing of the applicants involved, a description of the proposed development, and a project location.

Pursuant to the Commission's direction and adopted procedures, appropriate notice materials were sent to all applicants for posting at the project site. Additionally, these items have been posted at the District office and are available for public review and comment.

This report may also contain additional correspondence and/or any additional staff memorandum concerning the items to be heard on today's agenda for the Energy, Ocean Resources and Federal Consistency Division

**ENERGY, OCEAN RESOURCES AND FEDERAL CONSISTENCY DIVISION DEPUTY
DIRECTOR'S REPORT CONTINUED**

REPORT OF DE MINIMIS WAIVERS

The Executive Director has determined that the following developments do not require a coastal development permit pursuant to Section 30624.7 of the California Coastal Act of 1976.

<i>Applicant</i>	<i>Project Description</i>	<i>Project Location</i>
9-15-2077-W Southern California Edison Company, Attn: Wendy Miller	Extend the term of the Temporary Fire Protection Seawater Pump Project installed under CDP 9-14-1642-W at the University of Southern California (USC) Wrigley Institute for Environmental Studies, by approximately six months, to June 30, 2016.	1 Big Fisherman Cove, Avalon, Ca

**ENERGY, OCEAN RESOURCES AND FEDERAL CONSISTENCY DIVISION DEPUTY
DIRECTOR'S REPORT CONTINUED**

NEGATIVE DETERMINATIONS AND NO EFFECT LETTERS

Administrative Items for Federal Consistency Matters

<i>Applicant</i>	<i>Project Description</i>	<i>Project Location</i>
ND-0034-15 Bureau of Land Management	Five-year authorization for continued OHV use and management at Eureka Dunes Riding Area on the north spit of Humboldt Bay Action: Concur, 12/15/2015	Eureka Dunes Riding Area, North Spit Of Humboldt Bay, Humboldt County (APN(s): 40115103)
ND-0039-15 Department of the Navy	Implementation of compensatory wetland restoration by installing two culverts to connect an existing wetland with an existing tidally-influenced drainage channel at Naval Base Ventura County - Point Mugu. Action: Concur, 1/4/2016	Naval Base Ventura County - Point Mugu (APN(s): 2390030010)
NE-0010-15 Bureau of Safety and Environmental Enforcement	ExxonMobil Corporation OCS Lease Extension Santa Ynez Unit, request to BSEE for one additional year to resume operations due to Plains AllAmerican Oil Spill Action: Concur, 12/10/2015	Santa Ynez Unit, Ocs Waters Offshore Santa Barbara County
NE-0011-15 SANDAG, Attn: Rob Rundle	Undertake 24 geotechnical borings in the railroad right-of-way between MP 234.2 and 235.2, at upland, wetland, and lagoon locations, in support of the Batiquitos Lagoon Double Track Project, City of Carlsbad, San Diego County. Action: Concur, 1/4/2016	Batiquitos Lagoon, City Of Carlsbad, San Diego County (APN(s): 2161400200)

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December 15, 2015

Coastal Development Permit De Minimis Waiver Coastal Act Section 30624.7

Based on the project plans and information provided in your permit application for the development described below, the Executive Director of the Coastal Commission hereby waives the requirement for a Coastal Development Permit pursuant to Section 13238.1, Title 14, California Code of Regulations. If, at a later date, this information is found to be incorrect or the plans revised, this decision will become invalid; and, any development occurring must cease until a coastal development permit is obtained or any discrepancy is resolved in writing.

Waiver: 9-15-2077-W

Applicant: Southern California Edison Company

Location: 1 Big Fisherman Cove, Avalon, CA 90704

Proposed Development: Extend the term of the Temporary Fire Protection Seawater Pump Project, located at the University of Southern California (USC) Wrigley Institute for Environmental Studies, by approximately six months, to June 30, 2016.

Southern California Edison (SCE) proposes to extend the period of emplacement of two temporary seawater pumps installed on a boat ramp at the USC Wrigley Institute for Environmental Studies (Wrigley Institute), near Two Harbors, Santa Catalina Island, Los Angeles County. The pumps were originally installed in October of 2014 under Coastal Development Permit (CDP) waiver No. 9-14-1642-W, with a project term of six months. The purpose of the pumps is to provide temporary emergency fire suppression capabilities to the Wrigley Institute campus while SCE's existing fire suppression system is off-line for maintenance and repairs. The existing system depends on fresh water from SCE's "Million Gallon Tank" (MGT), located on a hillside above the campus, which has been unavailable due to the repair work for the past year and a half. Under SCE's original proposal, repairs to the MGT were to have been completed by March 2015, and the temporary seawater pumps were to have been removed by April 20, 2015. However, due to delays in acquiring permits from other local, state and federal agencies, the repairs were not completed by that date. In April 2015, SCE applied to the Commission for a time extension for the temporary seawater pumps, which was approved on May 14, 2015 as CDP waiver No. 9-15-0436-W.

At present, the repairs to the MGT have been completed, but due to the drought conditions on Catalina Island, the refilling of the tank has proceeded more slowly than anticipated, and will not be completed until June 2016. SCE is thus seeking authorization to retain the seawater pumps for an additional six months.

Coastal Development Permit De Minimis Waiver

9-15-2077-W

Pursuant to the original CDP waiver, a portable saltwater pump (2,800 gallons per minute capacity) was placed at the top of the Wrigley Institute's existing concrete boat ramp. A second, auxiliary pump was placed nearby to provide back-up in the event of primary pump failure. The primary seawater pump is connected to a 12-inch diameter stainless steel intake pipe extending approximately 175 feet down the boat ramp into Big Fisherman's Cove, the embayment adjacent to the campus, which is a part of the Blue Cavern State Marine Conservation Area. The pipe is held in place by several concrete support blocks, and terminates with an intake strainer positioned approximately three feet below the mean low tide elevation. The entire structure is located on the concrete boat ramp and does not extend onto natural seafloor. An 8-inch diameter outlet pipe connects the saltwater pump to existing fire department connections serving the campus.

This temporary saltwater system is intended as a secondary back-up to be used in the event of a catastrophic fire at the campus. As an initial line of defense against a fire, SCE has its disposal approximately 100,000 gallons of fresh water, stored in multiple small temporary tanks connected to the existing water lines. If and when the 100,000 gallon fresh water supply is exhausted, the seawater pump would be used to continue to supply water for fire suppression. The pump would be used only for emergency fire suppression. The seawater pumps and all associated piping will be dismantled and removed once the MGT is back in service.

SCE proposes to keep the temporary fire suppression system (seawater pumps, intake pipes and outlet pipes) in place until June 30, 2016, at which point it would be removed. If it becomes necessary to retain the system beyond this date, SCE will seek new authorization from the Commission. SCE will notify Commission staff when the pumps have been removed.

Waiver Rationale: For the following reasons, the proposed project will not have a significant adverse effect, either individually or cumulatively, on coastal resources, nor will it conflict with Chapter 3 policies of the Coastal Act:

- **Marine Resources:** The seawater pumps, intake pipe, and concrete pipe supports are located on an existing concrete boat ramp and will not disturb benthic habitat or permanently fill coastal waters. The extension of the project through the winter and spring months (cool/wet season) of 2016 would add little additional risk that the pumps would be used, while the availability of an alternate water source (100,000 gallons in temporary tanks) reduces the chance that the seawater pumps would be put into service during a minor fire. Thus, if the pumps are used it would be under emergency conditions during a single major fire event.
- **Water Quality:** The pumps are situated in secondary containment basins with adequate capacity to ensure that leakage of fuel or lubricants oils from the pumps would not reach the ocean. The pumps will receive regular inspection and maintenance throughout their period of emplacement, including the manual removal of fouling organisms from the intake. Pump refueling occurs at least 200 feet away from the shoreline.
- **Land Resources/Sensitive Habitat:** The seawater pumps and intake pipe will be located entirely on the concrete boat ramp, and the outlet pipe will be placed on paved or previously disturbed ground, avoiding all environmentally sensitive habitat areas.
- **Public Access & Views:** The Wrigley Institute boat ramp is not open to the public, and the installation of the seawater pumps will not interfere with public access to the coast. Likewise, the proposed seawater pumps will not have significant effects on views to or along the coast.

Coastal Development Permit De Minimis Waiver

9-15-2077-W

The proposed development will not adversely impact coastal resources, public access, or public recreation opportunities, and is consistent with past Commission actions in the area and Chapter Three policies of the Coastal Act.

This waiver will not become effective until reported to the Commission at their January 13-15, 2016 meeting in San Diego and the site of the proposed development has been appropriately noticed, pursuant to 13054(b) of the California Code of Regulations. The Notice of Pending Permit shall remain posted at the site until the waiver has been validated and no less than seven days prior to the Commission hearing. If four (4) Commissioners object to this waiver of permit requirements, a coastal development permit will be required.

Charles Lester,
Executive Director



Joseph Street
Environmental Scientist

cc: File

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December 15, 2015

Molly Brown
Arcata Field Manager
Bureau of Land Management
ATTN: Bruce Cann
1695 Heindon Road
Arcata, CA 95521

Subject: Negative Determination ND-0034-15 (Eureka Dunes Riding Area, North Spit Humboldt Bay, Humboldt County)

Dear Ms. Brown:

The Commission staff has reviewed the above-referenced negative determination. The Bureau of Land Management (BLM) proposes to continue off-highway vehicle (OHV) use and management activities on 75 acres of property owned by the City of Eureka but managed by the BLM since 1998 pursuant to a Memorandum of Understanding entered into by the BLM and the City. The project site, known as the "Eureka Dunes Riding Area" is located adjacent to the 300-acre BLM Samoa Dunes Recreation Area on the North Spit of Humboldt Bay, of which 150 acres is designated for OHV use. The combined 225 acres are managed by the BLM as a single OHV use area.

To address conflicts between unregulated OHV use and protection of sensitive coastal dune habitat, Humboldt County adopted its *Beach and Dunes Management Plan* in 1994, after five years of study, planning, environmental review, and public hearings. The *Plan* provides a framework for managing the beach and dune areas of the north and south spits of Humboldt Bay, and in 1994 was incorporated into the Humboldt County LCP as Amendment No. 1-93. The *Plan* concluded that the only areas where OHV use would be allowed are the BLM's Samoa Dunes Recreation Area, the City of Eureka's Eureka Dunes Riding Area, and along the wave slope for limited purposes. However, because the Eureka Dunes Riding Area is located within the Commission's area of retained permit jurisdiction, the Coastal Act remained the standard of review for proposed activities in this area, rather than the amended LCP.

In January 1995 the Commission's Executive Director concurred with the BLM's negative determination ND-113-94 for managing OHV use and protecting sensitive habitat at the Samoa Dunes Recreation Area. In 1998 the BLM and the City applied for, and the Commission approved, CDP No. 1-98-067, which authorized OHV use on the Eureka Dunes Riding Area for a period of two years, subject to special conditions regarding OHV use standards, annual monitoring reports, and a two-year time period for OHV use on the property. The subject property had been significantly disturbed over many years prior to this approval due to

unauthorized and indiscriminate OHV use and other human activities, and the Commission determined that proposed two-year management plan would begin to resolve use conflicts and protect sensitive habitat in a balanced way. The Commission subsequently approved CDP Nos. 1-00-047, 1-05-028, and 1-10-017 (again submitted by the BLM and the City), each of which authorized the continued use of OHV riding in the Eureka Dunes Riding Area for additional five-year time periods, along with special conditions regarding OHV management, annual reporting, fenced enclosures to protect rare and endangered plant species, and trail maintenance. These approvals were granted in part due to continued safe and orderly OHV use, uninterrupted monitoring and protection of sensitive habitat and resources, successful habitat restoration in areas closed to OHV use, ongoing facility and trail maintenance, an active law enforcement presence, and a sustained reduction in OHV trespass into areas closed to OHV use.

The subject negative determination states that under the four previous CDPs the BLM was required to:

1. Provide an annual report to the Commission.
2. Maintain all protective fencing and signs.
3. Prevent OHV use in unauthorized areas (nearly three acres of fenced and protected dune habitat containing native plant species).
4. Conduct annual monitoring of the plant species within the protected enclosures (including the status of any rare and/or endangered species).
5. Conduct annual restoration within the enclosures that involved hand pulling and removal of invasive plants such as European beachgrass, yellow bush lupine, and iceplant.
6. Monitor and report on law enforcement efforts, breaches in any of the protective fencing, and OHV use numbers and activities.

The BLM states that after 16 years of annual monitoring, agency biologists have determined that no negative impacts have occurred to any sensitive resource values in the Eureka Dunes Riding Area as a result of OHV use, and that "vehicle trespass into closed areas further north along the beach has been reduced dramatically since the BLM began managing the Eureka Dunes Riding Area." The subject negative determination further states that:

The BLM's negative determination for continued OHV use and management on the 75-acre "Eureka Dunes Riding Area" includes the incorporation of and the commitment to implement the five special conditions that were attached to coastal development permit 1-10-017 (City of Eureka and BLM), in order to ensure continued protection of coastal resources during the five-year period (December 2015 through December 2020) of the subject negative determination, with the following clarifications:

1. *The start date in Special Condition #2 is changed to 2016.*
2. *In Special Condition #3 and Special Condition #4, rather than an amendment to CDP No. 1-10-017, the BLM will submit a negative determination to the Executive Director.*

3. *The end date in Special Condition #5 is changed to December 31, 2020, and continued OHV use after that time will require a new negative determination.*

The BLM's proposal will provide for continued public access and recreation at the project area, which is dominated by OHV use but also includes small numbers of people surf fishing, beachcombing, and surfing. The BLM responds to the occasional reports of marine mammals beaching themselves in the project area by posting signs and informing beachgoers to keep a safe distance away. In 1998 the BLM constructed two fenced enclosures at the project area to protect all pre-existing, remnant native plant communities. Subsequently, the enclosures were expanded to include densely vegetated dunes of European beachgrass that also contained interstitial native plant communities. These expanded areas have been manually treated to remove the beachgrass and support recolonization by native plants. The BLM reports that in the absence of managed OHV use, the annual maintenance of and restoration work within the conservation enclosures would be discontinued by the BLM due to the loss of annual funding provided by the Off-Highway Motor Vehicle Recreation Division of California State Parks. This funding supports much of the management, monitoring, protection, and restoration work in the project area. Results from annual soil monitoring indicate that no trail deterioration has occurred from OHV use and that only erosion from naturally occurring wind and wave patterns is discernable in the project area. In a letter to the BLM, the North Coast Regional Air Quality Management District stated that its review of available air monitoring data and compliance reports indicates that there is no evidence to support a finding that OHV activity at the project area poses a significant air quality health risk for adjacent areas.

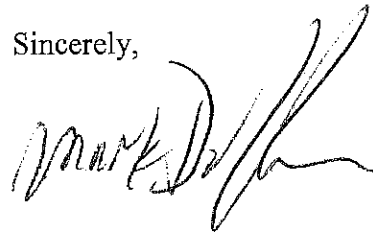
The BLM reports that in 1998 an intensive archaeological survey of the entire project area was conducted by the BLM in coordination with Humboldt State University and the Wiyot Tribe from Table Bluff Reservation. No cultural materials were found during this effort. In addition, historic maps detailing the U. S. Coast Surveys of 1851 through 1937 show that the majority of the project area is accreted land, deposited as a result of north jetty construction beginning in 1891. The BLM contacted three Wiyot area Tribal Historic Preservation Officers in June 2015 seeking input on continued authorization of OHV use in the project area. All three officers emailed the BLM stating they had no concerns with continued OHV use in the project area. In addition, the BLM states in its negative determination that it has not observed any cultural sites of any kind in the project area since 1998. However, if one is discovered during the next five-year time period the BLM will protect the site with physical barriers and begin consultation with tribal representatives in order to determine appropriate measures to manage the site.

In conclusion, the Commission staff **agrees** that the proposed continuation for another five-year time period of OHV use at the Eureka Dunes Riding Area on the North Spit of Humboldt Bay would protect existing public access and recreation at the riding area and protect environmentally sensitive habitat areas within and adjacent to the riding area. The project is similar to and consistent with Commission approvals in 1998, 2000, 2005, and 2010 of coastal development permits issued to the BLM for managed OHV use at this location. The BLM has incorporated into its negative determination all the special conditions that were attached to the coastal development permits it received from the Commission. The permit special conditions which the BLM has committed to implement throughout the five-year time period of this negative

Molly Brown, BLM
ND-0034-15

determination will ensure continued protection of sensitive habitats, provide annual reporting of OHV use patterns and conservation activities, and require submitting a new negative determination for OHV use in the riding area beyond December 31, 2020. With these commitments, we **concur** with your negative determination made pursuant to 15 CFR §930.35 of the NOAA implementing regulations. Please contact Larry Simon at (415) 904-5288 should you have any questions regarding this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Charles Lester", with a stylized flourish at the end.

(for)

CHARLES LESTER
Executive Director

cc: CCC – North Coast District
Lisa Savage, City of Eureka

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January 4, 2016

C.D. Janke
Captain, U.S. Navy
Commanding Officer
Naval Base Ventura County
311 Main Road, Suite 1
Point Mugu, CA 93042-5033

Subject: Negative Determination ND-0039-15 (Damage Assessment Restoration Planning and Wetland Restoration at Mugu Lagoon, Naval Base Ventura County)

Dear Captain Janke:

The Coastal Commission staff has reviewed the above-referenced negative determination. The Navy proposes to implement a wetland restoration project to compensate for interim losses of wetland resources associated with a May 2011 air tanker crash into Mugu Lagoon at the end of Runway 21 and Taxiway Alpha at Naval Base Ventura County (NBVC). The Navy states that this negative determination constitutes an after-the-fact report of the accident and clean-up actions as well as for the proposed compensatory restoration project. Emergency response crews were able to limit crash, fuel, debris, and fire impacts to an area of approximately 79 acres of open water and wetlands. Cleanup, debris removal, and excavation of contaminated sediments continued for many months afterward. A multi-agency Natural Resource Damage Assessment (NRDA) team conducted an initial assessment study, a benthic macro-invertebrate study, and a habitat equivalency analysis (HEA), the latter of which quantified compensatory restoration goals.

The negative determination states that:

Due to the length of time between the initial incident and the present, primary restoration in the form of natural recovery has occurred and evidence of the incident at the crash site is nearly non-existent. However, due to the determination of damages at the site, the NRDA process determined that compensatory restoration is required. Compensatory restoration is action taken to compensate for the interim losses of natural resources and/or services pending recovery. As a result of the HEA process, compensatory restoration of 3 to 4.5 acres of wetlands was calculated to compensate for the loss of biological services over time. The proposed project addresses that restoration goal.

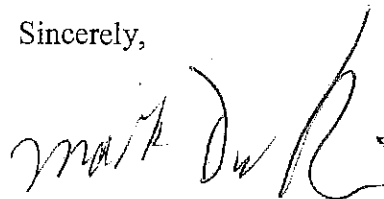
The Navy proposes to implement the wetland restoration project immediately southeast of the intersection of Laguna Road and South Mugu Road at NBVC. The project includes installation of two 60-foot-long, 8-foot x 8-foot pre-cast culverts underneath Laguna Road to connect an

existing low-functioning wetland site with an existing tidally-influenced drainage channel. The Navy would also grade and contour two new meandering 3-foot-wide and 1-foot-deep drainage swales from the road culvert terminus east across the wetland parcel. The two swales are currently planned to be 655 and 1,100 feet long respectively. Grading of the swales and culvert installation would temporarily affect 1.8 acres of the site but the project would reestablish tidal flows across the three-acre wetland site. While temporary impacts to wetland vegetation from trampling during construction are also expected to occur, the project would improve water quality on the site, improve habitat for fish and wading birds, and diversify and increase the site's population of benthic marine invertebrates and tidal vegetation. Project construction is expected to last eight weeks, and biological monitoring, maintenance, and adaptive management would extend over five years.

The project includes construction best management practices, an erosion control plan, and a storm water pollution prevention plan in order to minimize construction impacts at and adjacent to the project site. The Navy reports that Mugu Lagoon's wetlands are dominated by estuarine coastal salt marsh that provides food, nesting, breeding, and nursery grounds for numerous species of fish, wildlife, and plants. Also present are federal and state listed special status species, including the light-footed Ridgway's rail, Western snowy plover, Belding's savannah sparrow, and California least tern. The Navy states that while these listed species have not been recorded at the project site, they are present within one mile of the site and that Belding's savannah sparrow has been observed at a similar restoration site across Laguna Road. The restored wetland is expected to provide foraging habitat for Belding's savannah sparrow, Ridgway's rails, and California least tern. No impacts to listed species are anticipated as project construction will occur outside the nesting and breeding season.

In conclusion, the Commission staff **agrees** that the proposed wetland restoration project adjacent to Mugu Lagoon will not adversely affect coastal resources. We therefore **concur** with your negative determination made pursuant to 15 CFR 930.35 of the NOAA implementing regulations. Please contact Larry Simon at (415) 904-5288 should you have any questions regarding this matter.

Sincerely,



(for)

CHARLES LESTER
Executive Director

cc: CCC – South Central Coast District
Deb McKay, Navy Region Southwest

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December 10, 2015

Drew Mayerson
Regional Supervisor
Office of Production and Development
Bureau of Safety and Environmental Enforcement
Pacific OCS Region
760 Paseo Camarillo, Suite 102
Camarillo, CA 93010-6064

Re: **NE-0010-15**, No Effects Determination, ExxonMobil, One year addition to previously approved 180 day Lease Suspension, Santa Ynez Unit, Santa Barbara Channel

Dear Mr. Mayerson:

The Coastal Commission staff has received the above-referenced "no effects" determination for the request by ExxonMobil Corp. to be granted permission for additional one year extension to the previously-granted 180 day suspension of operations at the Santa Ynez Unit. The operations ceased after the U.S. Dept. of Transportation's Office of Pipeline Safety ordered corrections to onshore pipelines Line 901 and 903 in March, 2015, following the Plains All American pipeline spill on Line 901. We agree with your assessment that this additional suspension of active oil and gas operations would have no effect on any coastal zone resources, and we therefore concur with your "no effects" determination. Please contact Mark Delaplaine at (415) 904-5289 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "mark D. L.", with a stylized flourish at the end.

(for) CHARLES LESTER
Executive Director

cc: Ventura District Office
ExxonMobil Corp. (Robert Weitzel, Adam Scott)
Santa Barbara County Energy Division (Kevin Drude)

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January 4, 2016

Rob Rundle
Principal Regional Planner
SANDAG
401 B Street, Suite 800
San Diego, CA 92101-4231

Subject: No-Effects Determination NE-0011-15 (Geotechnical Borings for Batiquitos Lagoon
Double Track Bridge Project, Carlsbad, San Diego County)

Dear Mr. Rundle:

The Coastal Commission staff has reviewed the above-referenced no-effects determination. SANDAG proposes to undertake geotechnical investigations in January and February 2016 in support of the proposed Batiquitos Lagoon double track bridge project. The purpose of the testing program is to characterize the subsurface geologic and soil conditions for consideration in design and construction of the proposed project. Since January 2013, the Executive Director has concurred with seven similar geotechnical boring projects in support of double tracking and bridge replacement projects in San Diego County (NE-061-12, San Dieguito River bridge; NE-005-13, Carlsbad Village Station; NE-007-13 and NE-024-13, San Luis Rey River bridge; NE-0205-13, San Diego River bridge; and NE-0001-14 and NE-0007-15, San Elijo Lagoon bridge).

SANDAG proposes 14 small-diameter borings and 10 cone penetration test soundings located within the existing railroad right-of-way, on the west and east sides of the railroad track, and between Mile Posts 234.2 and 235.2. Three borings would be conducted from a barge in lagoon waters adjacent to the existing railroad bridge, six borings and five soundings would occur north of the bridge, and five borings and five soundings would occur south of the bridge. Wetland habitat will be avoided to the maximum extent practicable when selecting boring and sounding sites. The lagoon borings and barge moorings will temporarily affect approximately 60 square-feet of soft sandy bottom habitat, and four sounding sites located south of the bridge in or near the tidal zone will temporarily affect 0.8 square feet of wetland habitat. All boring and sounding sites will be backfilled and the ground surface restored to pre-disturbance conditions. The barge launching and lagoon boring areas are located outside of eelgrass beds. Given that the proposed geotechnical work will occur outside of the breeding season for listed bird species that use the lagoon and adjacent wetland habitat, noise associated with the project will not create adverse impacts to those species. Water quality protection measures and best management practices will

be implemented throughout the geotechnical testing period to protect wetland habitat and lagoon waters.

In conclusion, the Commission staff **agrees** with SANDAG's no-effects determination that the proposed geotechnical work at Batiquitos Lagoon will not adversely affect coastal resources. Please contact Larry Simon at (415) 904-5288 should you have any questions regarding this matter.

Sincerely,

A handwritten signature in dark ink, appearing to read "Mark Daffin" or similar, written over the printed name.

(✓ 2/1)

CHARLES LESTER
Executive Director

cc: CCC – San Diego Coast District
Tom Huffman, Helix Environmental Planning, Inc.