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To: Coastal Commissioners and Interested Persons

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Subject: **Notice of Impending Development No. NCC-NOID-0004-18 (Batiquitos Bluffs Restoration)** for Public Hearing and Commission Action at the May 11, 2018 Commission Meeting in Santa Rosa

SUMMARY OF STAFF RECOMMENDATION

The California Department of Transportation (Caltrans) is requesting review of Notice of Impending Development No. NCC-NOID-0004-18 to remove nonnative vegetation, install temporary irrigation, and plant native vegetation at the Batiquitos Bluffs mitigation site located approximately 400 feet west of El Camino Real on either side of La Costa Avenue, in the cities of Encinitas and Carlsbad. The Batiquitos Bluffs mitigation site is 50.8 acres. The majority of the site will be preserved as is. Approximately 3.9 acres of disturbed habitat including eucalyptus woodland, nonnative grassland, and Baccharis scrub will be restored to coastal sage scrub with native grasses. Freshwater marsh/southern willow scrub (2.5 acres) and brackish marsh/southern willow scrub (3.0 acres) wetland habitats will be enhanced by removal of nonnative species.

Specific tasks to be performed on the site include raking to remove thatch, exotic species removal, weeding, spot spraying, planting, hand seeding, and trash removal. No grading will occur. Main lines for irrigation will be installed under an existing dirt access road and adjacent to an existing sidewalk on the south side of La Costa Avenue. Within the restoration area, temporary irrigation lines with sprinkler heads will be installed on the surface and anchored in place in the 3.9 acre coastal sage scrub restoration area. No irrigation lines will be placed within the rest of the property. Primary restoration activities will occur between September and December 2018, with five years of maintenance and monitoring to follow.

Caltrans' goal is to permanently retire development potential of the site, preserve existing high quality upland habitat through site protection, and restore existing disturbed upland and wetland habitat through exotic species removal and active restoration. The native vegetation restoration

and preservation will improve habitat adjacent to the existing open space around the southeast side of Batiquitos Lagoon. Therefore, restoration of the site will strengthen the connection of wetlands to uplands and protect chaparral and coastal sage scrub habitats that support sensitive plants and wildlife. Restoration of the site will also improve wildlife connectivity between the open space areas.

The subject development is part of the development authorized by the certified North Coast Corridor Public Works Plan and Transportation and Resource Enhancement Program (NCC PWP/TREP), a comprehensive program of transportation, community, and resource enhancement projects within what is referred to as the “North Coast Corridor,” which extends from La Jolla to Oceanside along the North San Diego County coastline. More specifically, the NCC PWP/TREP includes widening of I-5 to accommodate four high occupancy vehicle lanes, double tracking of the Los Angeles – San Diego – San Luis Obispo (LOSSAN) rail corridor, enhanced coastal bus and bus rapid transit service, a new 27 mile North Coast Corridor Bike Trail that will provide non-motorized connectivity through the corridor, completion of 7 miles of the Coastal Rail Trail, other shorter connections to existing trail networks and transit stations, and resource enhancement projects to mitigate for impacts arising from some of these transportation projects. Batiquitos Bluffs is specifically identified as a mitigation site in the NCC PWP/TREP’s Resource Enhancement and Mitigation Program (REMP). The REMP provides for compensatory mitigation to enhance and restore biodiversity and habitat functions on a regional scale in advance of unavoidable impacts associated with NCC PWP/TREP transportation improvements. The REMP is intended to restore and enhance an integrated ecosystem that provides habitat for birds, fish, and benthic organisms, compensating for the loss of ESHAs that will occur from the NCC PWP/TREP transportation improvements, and enhancing ESHAs throughout the coastal zone in north San Diego County.

Jointly prepared by Caltrans and the San Diego Association of Governments (SANDAG), the NCC PWP/TREP was approved by the Commission on August 13, 2014 (PWP-6-NCC-13-0203-1), and has been amended twice since then (PWP-6-NCC-16-0001-1 and PWP-6-NCC-16-0006-2). The standard of review for the Commission’s review of the NOID is conformity with the certified NCC PWP/TREP, including the policies, design/development strategies, and implementation measures identified therein. The subject NOID was submitted by Caltrans on April 2, 2018, and filed as complete on April 10, 2018. The date by which the Commission must take action on the NOID is May 22, 2018.

Staff recommends that the Commission determine that the impending development is consistent with the certified NCC PWP/TREP, as submitted. The development is consistent with all policies, design/development strategies, and implementation measures of the NCC PWP/TREP. The motion and resolution to implement the staff recommendation are on page 6 of this report.

ADDITIONAL INFORMATION

Further information on the subject NOID may be obtained from Zach Rehm at (562) 590-5071.

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- Exhibit 1 – Vicinity Map
- Exhibit 2 – Habitat Mitigation and Monitoring Plan
- Exhibit 3 – Temporary Irrigation Plan

I. PROCEDURAL ISSUES

PUBLIC WORKS PLAN BACKGROUND AND HISTORY

Section 30114 of the Coastal Act defines public works to include, among other things, the following:

(b) All public transportation facilities, including streets, roads, highways, public parking lots and structures, ports, harbors, airports, railroads, and mass transit facilities and stations, bridges, trolley wires, and other related facilities. (...)

(c) All publicly financed recreational facilities, all projects of the State Coastal Conservancy, and any development by a special district.

Section 30605 of the Coastal Act states, in part:

To promote greater efficiency for the planning of any public works (...) and as an alternative to project-by-project review, plans for public works (...) may be submitted to the commission for review in the same manner prescribed for the review of local coastal programs set forth in Chapter 6 (commencing with Section 30500).

A Public Works Plan (PWP) is one of the alternatives available to the Commission and project proponents for Commission review of large or phased public works projects and remains under the authority of the Commission irrespective of coastal permitting jurisdictional boundaries. Developing and implementing a PWP is an alternative to undergoing project-by-project review for the individual public works projects within the plan (which, in the case of the overarching plan of which the current proposal is a part, would require multiple coastal development permits, in multiple jurisdictions, if not processed through a PWP). PWPs must be sufficiently detailed regarding the size, kind, intensity, and location of development to allow the Commission to determine their consistency with the Chapter 3 policies of the Coastal Act (in areas that are pre-LCP certification) or the certified LCP (in post-LCP certification areas). Once the Commission approves a PWP, in general, no coastal development permit is required for a specific project described within it; rather, before commencing each specific project, the project proponent must submit notice in the form of a NOID, which requires the Commission to determine whether the submitted project is consistent with the standards within the PWP, or if conditions are necessary to make it consistent. The PWP at issue here (known as the “NCC PWP/TREP”)¹ was approved by the Commission on August 13, 2014.

¹ As that name implies, this particular PWP is actually more than just a Public Works Plan. The “TREP” portion of the name reflects the fact that the package as a whole (referred to within this note as “the PWP”) includes components that were submitted to the Commission as a consistency certification (CC-0002-14), for review via the federal consistency process created by the Coastal Zone Management Act. In August of 2014, the Commission concurred with that consistency certification at the same time it certified the actual Public Works Plan. Finally, the PWP also includes project components that are within the Commission’s area of retained jurisdiction, and which therefore remain subject to the normal coastal development permit process, rather than the NOID process typically associated with PWPs.

Chapter 4 of the NCC PWP/TREP (Scope of Planned Improvements) includes a description of specific projects, including rail improvements (e.g., double-tracking, rail bridge replacement, station improvements, tunnels); Interstate 5 improvements (e.g., high occupancy vehicle lanes, direct access ramp, auxiliary lanes, highway bridge replacement, park-and-rides); other transportation improvements (e.g., bus rapid transit, Coast Highway bus service, interchange improvements); bicycle, pedestrian, and recreational improvements (e.g., Coastal Rail Trail, North Coast Bike Trail, rail crossings, highway crossings, community enhancement projects); and natural resource and environmental improvements (e.g., restoration of corridor lagoons, bridge optimization). The location of these specific projects is also illustrated in several figures within Chapter 4.

Chapter 5 of the NCC PWP/TREP (Coastal Development Policies and Resources) is divided into ten sections with each section containing policies, design/development strategies, and implementation measures, in order of increasing specificity, specific to the relevant issue area. The policies and design/development strategies apply to all NCC PWP/TREP improvements, while the implementation measures are project-specific (each individual implementation measure applying only to certain projects) and apply only to the NCC PWP/TREP improvements that are subject to the NOID review process (as indicated in the footnote on the prior page, this particular PWP includes analyses of projects within the commission's area of retained jurisdiction, which therefore remain subject to the normal CDP process, as well as some components that are to be reviewed through the federal consistency process rather than the NOID process).

STANDARD OF REVIEW

Sections 30605 and 30606 of the Coastal Act and Title 14, Sections 13357(a)(5), 13359, and 13353-54 of the California Code of Regulations govern the Coastal Commission's review of subsequent development where there is a certified PWP. The standard of review for those portions of the proposed project that are specifically authorized by the PWP component of the NCC PWP/TREP, and for which a NOID has been submitted, is whether the development is consistent with the PWP. Section 13354 requires the Executive Director to review the NOID within five working days of receipt to determine whether it provides sufficient information to determine if the proposed development is consistent with the certified PWP. The notice is to be filed when all necessary supporting information has been received.

Pursuant to Section 13359 of Title 14 of the California Code of Regulations, within 30 working days of the filing of the NOID, the Executive Director shall report to the Commission the pendency of the development and make a recommendation regarding the consistency of the proposed development with the certified PWP. After public hearing, by a majority of its members present, the Commission shall determine whether the development is consistent with the certified PWP as submitted, or whether conditions are needed to bring the development into conformance with the PWP. The NCC PWP/TREP provides that the Commission shall take action within 30 working days of the filing of the NOID, unless Caltrans or SANDAG waive such requirement.

II. MOTION AND RESOLUTION

MOTION:

*I move that the Commission determine that the development described in Notice of Impending Development NCC-NOID-0004-18 is **consistent** with the certified North Coast Corridor Public Works Plan and Transportation and Resource Enhancement Program as submitted.*

STAFF RECOMMENDATION:

Staff recommends a **YES** vote on the foregoing motion. Passage of this motion will result in a determination that the development described in the NOID is consistent with the certified North Coast Corridor Public Works Plan and Transportation and Resource Enhancement Program, and adoption of the following resolution and findings. The motion passes only by affirmative vote of a majority of the Commissioners present.

RESOLUTION TO DETERMINE DEVELOPMENT IS CONSISTENT WITH NCC PWP/TREP:

The Commission hereby determines that the development described in Notice of Impending Development NCC-NOID-0004-18 is consistent with the certified North Coast Corridor Public Works Plan and Transportation and Resource Enhancement Program for the reasons discussed in the findings herein.

III. FINDINGS AND DECLARATIONS

A. PROJECT LOCATION & DESCRIPTION

The development identified in the NOID includes removal of nonnative vegetation, installation of temporary irrigation, and planting of native vegetation at the Batiquitos Bluffs mitigation site located approximately 400 feet west of El Camino Real on either side of La Costa Avenue, in the cities of Encinitas and Carlsbad (**Exhibit 1**). The project is approximately two miles inland of the Pacific Ocean and approximately 1,000 feet south of Batiquitos Lagoon. It is surrounded primarily by open space, with residential development adjacent to the southeast corner of the site. The Batiquitos Bluffs mitigation site is 50.8 acres. The majority of the site will be preserved as is. Approximately 3.9 acres of disturbed habitat including eucalyptus woodland, nonnative grassland, and Baccharis scrub will be restored to coastal sage scrub with native grasses. Freshwater marsh/southern willow scrub (2.5 acres) and brackish marsh/southern willow scrub (3.0 acres) wetland habitats will be enhanced by removal of nonnative species (**Exhibit 2**).

Specific tasks to be performed on the site include raking to remove thatch, exotic species removal, weeding, spot spraying, planting, hand seeding, irrigation, and trash removal. No grading will occur. To prepare the site, the restoration and wetland areas with nonnative vegetation will be cleared of dead plant material and weed seeds. Within the restoration area, the

decomposed material from exotic species will be raked to remove seeds and expose soil to allow annual native species that still may exist in the seed bank to germinate. Nonnative species in the wetland onsite north of La Costa Avenue will be removed by spraying with herbicides and/or cutting above the surface and removal and spraying. No planting will occur within the wetland north of La Costa Avenue.

Main lines for irrigation will be installed under an existing dirt access road and adjacent to an existing sidewalk on the south side of La Costa Avenue. Within the 3.9 acre coastal sage scrub restoration area, temporary irrigation lines with sprinkler heads will be installed on the surface and anchored in place (**Exhibit 3**). No irrigation lines will be placed within the rest of the property. All irrigation will be installed prior to planting onsite. The water source for the site is recycled water from La Costa Avenue. After initial establishment of plants onsite, irrigation will mimic natural rainfall patterns, except where dry season irrigation is necessary to prevent plant death or damage. All irrigation will be removed at the end of the project, which is expected to last five years.

The majority of the existing native vegetation will be preserved; however, some coyote bush plants may be trimmed or removed to access weedy areas and lay irrigation pipe on grade. Access to the site will be through the existing access road off La Costa Avenue. Following clearing of exotic species and installation of irrigation, the site will be planted by hand with a combination of container and seed stock. The site will be revegetated with coastal sage scrub species including coastal sagebrush, flat-topped buckwheat, deerweed, California encelia, black sage, white sage (*Salvia apiana*), lemonadeberry (*Rhus integrifolia*), laurel sumac (*Malosma laurina*), coastal prickly-pear, toyon (*Heteromeles arbutifolia*), giant wild rye (*Leymus condensatus*), and purple needle-grass. Primary restoration activities will occur between September and December 2018, with five years of maintenance and monitoring to follow.

Caltrans' goal is to permanently retire development potential of the site, preserve existing high quality upland habitat through site protection, and restore existing disturbed upland and wetland habitat through exotic species removal and active restoration. The native vegetation restoration and preservation will improve habitat adjacent to the existing open space around the southeast side of Batiquitos Lagoon. Therefore, restoration of the site will strengthen the connection of wetlands to uplands and protect chaparral and coastal sage scrub habitats that support sensitive plants and wildlife. Restoration of the site will also improve wildlife connectivity between the open space areas.

Batiquitos Bluffs is specifically identified as a mitigation site in the NCC PWP/TREP's Resource Enhancement and Mitigation Program (REMP). The REMP provides for compensatory mitigation to enhance and restore biodiversity and habitat functions on a regional scale in advance of unavoidable impacts associated with NCC PWP/TREP transportation improvements. The REMP provides for the establishment, restoration, enhancement, preservation, and long-term management of coastal wetlands and adjacent riparian areas, transitional habitats, and upland areas. The approved program is intended to restore and enhance an integrated ecosystem that provides habitat for birds, fish, and benthic organisms, compensating for the loss of ESHAs that will occur from the NCC PWP/TREP transportation improvements, and enhancing ESHAs throughout the coastal zone in north San Diego County.

The Batiquitos Bluffs mitigation site contains 41.4 acres of high quality upland habitat which will be preserved in perpetuity. Through the provisions of the REMP, the enhancement and preservation of the Batiquitos Bluffs mitigation site will serve to mitigate long-term temporary impacts to upland habitat associated with NCC PWP/TREP transportation improvements, including Phase 1/Stages 2 & 3 (CDP 6-18-0204 and NOID NCC-NOID-0003-18) of the Interstate 5 NCC Project approved by the Commission in April 2018. Pursuant to Section 6B.2.3.1 of the REMP, disturbances resulting in impacts lasting more than 12 months are defined as long-term temporary impacts and must be mitigated either through revegetation with native species of other nonnative habitat temporary impact areas at a 1:1 ratio of replacement to impacts, or the preservation of high-quality native habitat under the threat of development at a 2:1 ratio of preservation to impacts. Habitat preservation credits are intended only as mitigation for long-term temporary impacts by ensuring long-term preservation of upland sites in advance of any construction impacts.

In addition to receiving credits for preserving high quality upland habitat, Caltrans anticipates receiving mitigation credits for 3.9 acres of upland habitat restoration through the subject project. Mitigation credit release is based on the timing of site-specific Habitat Mitigation and Monitoring Plan (**Exhibit 2**) approval, mitigation project implementation, and attainment of specific site protections and project performance criteria. All credit releases are subject to the review and approval of the REMP Working Group, which includes staff from the California Coastal Commission, California Department of Fish and Wildlife, California Regional Water Quality Control Board, U.S. Army Corps of Engineers, U.S. Fish and Wildlife Service, and National Marine Fisheries Service.

Caltrans has submitted a Consistency Analysis for Environmentally Sensitive Habitat Areas (ESHA) and a Consistency Analysis for Archaeological and Paleontological Resources. The analyses discuss the NOID's consistency with the relevant sections of Chapter 5 of the NCC PWP/TREP. The project does not include any changes to public access or any new development that would adversely impact visual resources.

B. BIOLOGICAL RESOURCES

Policy 5.5.1 of the NCC PWP/TREP states:

Development of NCC transportation facility and community enhancement projects shall be sited and designed to ensure that ESHAs are protected against any significant disruption of habitat values. Development in areas adjacent to ESHAs shall be sited and designed to prevent impacts that would significantly degrade those areas, and shall be compatible with the continuance of those habitat and recreation areas.

The goal of the project is to preserve existing high quality upland Environmentally Sensitive Habitat Areas (ESHA), restore existing disturbed upland habitat, and enhance existing wetlands. No direct or permanent impacts to ESHA are anticipated as part of the project. Impacts to California gnatcatchers and other bird species will be avoided by completing primary restoration

activities (vegetation removal, weeding, planting) outside of bird nesting season. All project restoration work will be monitored by a Caltrans Biologist and Mitigation Specialist.

In accordance with Design and Development Strategy (DDS) 4, mitigation measures to protect sensitive vegetation communities and rare plants have been incorporated into the project. All feasible efforts will be made to eradicate invasive species, consistent with Implementation Measure (IM) 5.5.3 and DDS 5. All native habitats outside the project limits will be temporarily fenced during construction, consistent with IM 5.5.1. Additionally, in accordance with IM 5.5.4, to minimize impacts to nesting migratory bird species, all native vegetation and non-native shrubs and trees within the impact areas shall be removed outside of the breeding season (February 15 to September 15).

This mitigation project was approved by the REMP, and was found to significantly enhance wetland and restore upland habitat resources, all of which will facilitate enhancement of ESHA and special-status species throughout the North Coast Corridor. A Habitat Mitigation and Monitoring Plan has been prepared for the site (**Exhibit 2**) and includes the above referenced best practices and avoidance measures. Pursuant to the REMP, a Long-Term Management Plan for the mitigation site must be prepared before the next batch of mitigation credits can be released, which will require ongoing monitoring and satisfaction of performance standards. The project is expected to provide 41.4 acres of upland preservation, 3.9 acres of upland restoration, 3.0 acres of brackish marsh/riparian enhancement (no mitigation credits expected), and 2.5 acres of freshwater marsh/riparian enhancement (no mitigation credits expected). The REMP provides that the U.S. Fish and Wildlife Service will grant credit for the 3.0 acres of enhancement in order to mitigate for potential future indirect impacts to Ridgway's rails when the Batiquitos Bridge is replaced in the future, but the Commission cannot accept enhancement as compensatory mitigation. The enhancement of 2.5 acres of freshwater/riparian also cannot be granted mitigation credits by the Commission but Caltrans will conduct weeding to reduce weed seed adjacent to the restoration area and to enhance the wetland. Such enhancement is consistent with Policy 5.5.1 of the NCC PWP/TREP, which states that development shall be compatible with the continuance of habitat areas.

Therefore, the Commission finds that the subject NOID, as submitted, is consistent with the applicable policies, design/development strategies, and implementation measures included in Section 5.5.3 (Environmentally Sensitive Habitat Areas and Special Status Species) of the NCC PWP/TREP.

C. ARCHAEOLOGICAL AND PALEONTOLOGICAL RESOURCES

Policy 5.6.1 of the NCC PWP/TREP states:

New highway development, rail station and pedestrian crossings, and associated community and resource enhancement improvements shall strive to protect and minimize impacts to archaeological and paleontological resources. Where new development may potentially adversely impact archaeological or paleontological resources, appropriate mitigation measures, including the measures identified below, shall be required and implemented.

Caltrans has conducted a records search, Native American consultation, consultation with the Encinitas Historic Society, and an archaeological pedestrian survey for the project area, consistent with Design and Development Strategy 3. Two Native American sites with artifact scatter and historic-era building foundations have been identified within the project area. Caltrans states that soil in these areas has previously been disturbed and that the subject habitat restoration and preservation project does not include any grading and will not impact the Native American sites. Caltrans also notes that of those Native American tribes, groups, and individuals that have responded to Caltrans' consultation efforts for this specific project, none have expressed concerns regarding Caltrans' efforts to identify historic properties of tribal religious and cultural value or with the project itself.

Consistent with DDS 1, a qualified Native American monitor and archaeologist will be present at all times during ground-disturbing activities in areas of known or suspected significance. Should previously unknown archaeological and/or paleontological resources be encountered during restoration activities, all activity that could damage or destroy these resources shall be temporarily suspended until Native American representatives, archaeologists, and/or paleontologists, as applicable, have examined the site and mitigation measures have been developed that address impacts of the project on archaeological and/or paleontological resources.

Based on the limited nature of project activities and the avoidance measures identified in this section, Caltrans found that the project will have no adverse effect on historic properties, and the State Historic Preservation Officer concurred on February 7, 2018.

As submitted, the development will avoid impacts to archaeological resources. In addition, there is no potential to impact paleontological resources due to the limited scope of the project activities. Therefore, the Commission finds that the subject NOID, as submitted, is consistent with the applicable policies, design/development strategies, and implementation measures included in Section 5.6.3 (Archaeological and Paleontological Resources) of the NCC PWP/TREP.

D. CALIFORNIA ENVIRONMENTAL QUALITY ACT

Pursuant to Public Resources Code Section 21067 and Sections 15050 and 15051 of Title 14 of the California Code of Regulations, Caltrans is the lead agency, for purposes of the California Environmental Quality Act (CEQA), for the project at issue in this report, as it is the public agency with principal responsibility for carrying out the I-5 related improvements, as well as the larger NCC PWP/TREP. As the lead agency under CEQA, Caltrans certified a Final Environmental Impact Report (EIR) addressing the subject plan on October 23, 2013.² Caltrans is also the state-designated lead agency under CEQA for the rail component of the NCC PWP/TREP, and as such, released the LOSSAN FINAL Program EIR/EIS in September 2007, with the Record of Decision issued on March 18, 2009.

² The certification of that EIR was the subject of litigation in San Diego Superior Court; *Cleveland National Forest Foundation v. California Department of Transportation*, San Diego Superior Court Case No. 37-2013-00078391-CU-TT-CTL. According to Caltrans, the matter was dismissed with prejudice on January 10, 2017, pursuant to a settlement agreement, and the EIR remains valid and in effect.

Although the Commission is only a “responsible agency” under CEQA, as an agency with a certified regulatory program under CEQA Section 21080.5, the Commission must consider alternatives and mitigation measures that would substantially lessen any significant adverse environmental effects that that the proposal would otherwise have on the environment. Section 21080.5(d)(2)(A) prohibits the Commission from approving a proposed development if there are feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse effect which the activity may have on the environment. There are no feasible alternatives or mitigation measures available which would substantially lessen any significant adverse impact that the activities may have on the environment because, as proposed, the project will not result in any significant adverse impacts. Therefore, the Commission finds that the NOID is consistent with CEQA Section 21080.5(d)(2)(A), as well as the applicable provisions of the NCC PWP/TREP.

APPENDIX A – SUBSTANTIVE FILE DOCUMENTS

1. North Coast Corridor Public Works Plan and Transportation and Resource Enhancement Program, approved by the Commission on August 13, 2014 (PWP-6-NCC-13-0203-1)
2. PWP Amendment No. PWP-6-NCC-16-0001-1
3. PWP Amendment No. PWP-6-NCC-16-0001-2
4. Policy Consistency Analyses – 5.5 Environmentally Sensitive Habitat Areas and Special Status Species; 5.6 Archeological and Paleontological Resources
5. NCC PWP/TREP Mitigation Credit Table