

CALIFORNIA COASTAL COMMISSION

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F8a

LCP-1-EUR-20-0009-1 PART C
(CITY OF EUREKA – CROWLEY SITE REDESIGNATION)
OCTOBER 9, 2020

CORRESPONDENCE

Kenyon, Cristin@Coastal

To: Kimberly Tays
Subject: RE: OPPOSITION to City of Eureka LCP Amendment LCP-1-EUR-20-0009-1, Part C (Crowley Site Re-designation); October 9, 2020, Agenda Item F8a

From: Kimberly Tays <kimkat067@gmail.com>
Sent: Saturday, September 26, 2020 6:07 PM
To: Kenyon, Cristin@Coastal <Cristin.Kenyon@coastal.ca.gov>; Merrill, Bob@Coastal <Bob.Merrill@coastal.ca.gov>
Subject: Re: OPPOSITION to City of Eureka LCP Amendment LCP-1-EUR-20-0009-1, Part C (Crowley Site Re-designation); October 9, 2020, Agenda Item F8a

Hi Cristin,
Please distribute my email below to the Coastal Commissioners for their upcoming Friday, October 9, 2020 meeting and include it with the public comments on this item. Thank you, Kim Tays

Dear Coastal Commissioners:

This letter is written in opposition to LCP Amendment LCP-1-EUR-20-0009-1, which would allow the Crowley site to be developed with a transitional housing facility. In reading pages 14 thru 22 of the Commission's staff report, I am astounded at the number of hazards associated with this parcel and the enormous impacts the project would have on the wetland ecosystem. Below are some of the statements that cause me to question why, when there are so many environmental constraints, dangers and sensitivities, that Commission staff worked so hard to craft modifications to the LCP Amendment to allow this development to proceed. I know providing housing for the homeless is an important and pressing issue, but this is simply the wrong place for this project.

Statements Found on Pages 14 - 22 of the Staff Report:

- *The parcel is located within a 100-year flood zone, and its high flood risk is expected to worsen in the coming decades with projected sea level rise.*
- *The parcel also has potential soil and groundwater contamination that requires capping the pervious ground surface.*
- *Fill materials on the northern end of the parcel have less shear strength and more compressibility than the fill materials to the south, and thus are not suitable as bearing material in their existing condition.*
- *Soft soil conditions identified in the bay-margin sediments [...] present a settlement hazard.*
- *Strong ground shaking is anticipated at the parcel during the anticipated life of any typical residential [...] structure. Northwestern California is one of the most seismically active regions in the continental United States. An active segment of the Little Salmon fault zone is located approximately 1.5 miles to the southwest of the subject parcel, and there are several other local sources capable of producing strong seismic shaking at the parcel, including the Gorda plate, the Mendocino fault, the Mendocino triple junction, the northern end of the San Andreas fault, other faults within the North American plate, and the Cascadia Subduction Zone (CSZ).*
- *The site has a low to moderate potential for liquefaction and other seismically-induced ground failures, except during long-duration strong ground shaking associated with a rare, great earthquake [...], when the potential for liquefaction would be moderate to high.*

- *The subject parcel is located within the mapped tsunami inundation area [...] and is at risk of tsunami inundation from waves generated from a variety of local and distant sources. Based on available inundation modeling, the subject parcel would not be inundated by smaller, more frequent tsunamis, but would be inundated by more infrequent and extreme events [...].*
- *In the Humboldt Bay area, the time window between tsunami generation and local inundation could be on the order of only minutes [...]. In the case of a locally-generated tsunami, the only warning residents or employees of the site would receive would be a natural warning (e.g., strong or long-lasting shaking from an earthquake) approximately 10-15 minutes before inundation by the tsunami, originating from the CSZ source.*
- *The parcel's location adjacent to the City's WWTP (which holds chemicals for water treatment as well as large volumes of human waste) and proximity to a number of heavy commercial and industrial uses (with heavy equipment, motor vehicles, lumber, above-ground liquid and solid storage containers, various forms of solid waste, etc.) adds to the parcel's risk of impacts from debris and hazardous materials as a result of a tsunami.*
- *The subject parcel is a low-lying, relatively flat parcel within the mapped 100-year floodplain with a base flood elevation of ten feet [...].*
- *Because this stretch of Eureka Bay shoreline is not fortified by hard armoring [...], it has been ranked as highly vulnerable in the "Humboldt Bay Shoreline Inventory, Mapping, and Sea Level Rise Vulnerability Assessment[...]."*
- *Without the protection of the intervening trail and road, the filled northwestern portion of the parcel would be vulnerable to yearly tidal inundation (MAMW) from the west with just 0.2 feet of sea level rise, and monthly inundation (MMMW) with just 1.26 feet of sea level rise*
- *With approximately 2.4 feet of sea level rise, the intervening roadway between the parcel and the shoreline would be overtopped, and the parcel would be flooded on a yearly basis during large storms and king tides (MAMW).*
- *While Hilfiker Lane and the CCT are at a higher elevation than the parcel and prolong the amount of time the potential development footprint will be protected from direct tidal inundation from the shoreline to the west, flooding could occur earlier from the east and south.*
- *Today, runoff from the former tank farm area continues to flow west to east across the site towards these wetlands and eventually discharges to the Elk River and Humboldt Bay. Because of this drainage connection to the bay, higher tides associated with sea level rise will impair the drainage of the parcel, increasing the risk of backwater flooding of the developable portion of the parcel over time.*
- *Extensive wetlands cover a significant portion of the parcel and are part of a larger wetland complex adjoining the parcel that drains to Elk River and Humboldt Bay.*

In addition to the above risks, fire and smoke are also threats, because the fire training facility is next to the Crowley site and regular training sessions are conducted there. It seems almost every hazardous condition imaginable is applicable to this parcel--that should be reason enough to abandon any thoughts of putting housing here. The City of Eureka even admitted that *hazards may impact this parcel to a greater degree than other parcels in the CS Zone*. If that is the case, City officials should seek a safer, less environmentally damaging location for these trailers. Surely, with all of the defunct businesses, empty lots and vacant or semi-vacant mills, there are suitable alternative sites for this facility.

For generations, Humboldt Bay has suffered environmental degradation, air and water pollution and visual blight from intensive industrial and commercial development. If you look at Google satellite images of Eureka's waterfront, you get a bird's eye view of the intrusive nature of the development and how it has vastly altered the natural environment. The little bit of open space and wetlands left along the Bay have, unfortunately, been compromised by the intensive alteration of the landscape and invasion of non-native plants. That is why it is so important to save the Crowley site from development. California has already lost more than 90% of its original wetlands from overdevelopment and human impacts. The last thing we should be doing is inflicting more harm on our remaining wetlands. Instead, we should seize this amazing opportunity to restore and beautify this undeveloped site—getting rid of the invasive plants and coaxing native

plant communities back to health so they can nurture birds, aquatic species and other critters that depend on a functioning wetland ecosystem to rest, nest, flee and forage.

Below are some photos showing the dilapidated condition of the trailers. Putting these unsightly trailers on the Crowley site would greatly detract from the natural beauty and character of the Bay and Trail. Not only are the trailers run down and unsightly, they have been exposed to the elements, as some of the black plastic coverings on the outside walls have torn loose, exposing the interior of the trailers. It is also my understanding these trailers, which look to be pretty old, were once used as offices at the Humboldt Bay Nuclear Power Plant. This stirs up a host of questions: (1) Are the trailers safe to inhabit? (2) Have they been tested for mold? (3) Have they been tested for radioactive contamination? (4) Was asbestos used in their construction? (5) How much longer are they inhabitable?

Another big impact from this project is the need to pave the development footprint, due to ground/soil contamination from the fuel storage facility that occupied this location for decades. In addition to paving the contaminated site, public and private utilities and ADA-compliant driveway, parking and sidewalk improvements would need to be made. Even though the housing facility is supposed to be temporary, the paving improvements would, most likely, be permanent. And once the facility is in operation, it will be next to impossible to close it down, since it would displace so many individuals. These extensive changes to the site will have very detrimental impacts to the wetlands, Humboldt Bay and Elk River. The other disturbing thing about this project is that, unlike other nearby businesses that close down certain times of the day or week, this housing facility is a 7/24 operation. This means wildlife would have no reprieve from the intrusion of human activities. Even if the wetlands are not filled in, they will be degraded by: (1) more impervious surfaces and run-off, (2) inadequate setbacks, (3) noise pollution, (4) light pollution, (5) traffic, (6) trash, and (7) human and pet activities. And, sadly, once the Crowley site is developed, there is little chance the area will ever be restored, as the habitat values will be too compromised by the development. Surely, state and local leaders can see the value in preserving this site so it can, eventually, be restored to benefit the many animal species that depend on a functioning wetland ecosystem to survive and thrive.

No matter how you package this LCP Amendment, this project is dangerous, unsightly, damaging and incompatible with a wetland/ESHA environment that encompasses the Elk River, Eureka Slough and Humboldt Bay. The sheer number of dangers to the inhabitants and impacts to the ecosystem, adjacent bodies of water and visual resources of the Bay will conflict with Coastal Act sections: 30230 (Marine resources), 30231 (Biological productivity; water quality) 30233 (Diking, filling or dredging), 30253 (Minimization of adverse impacts) and 30251 (Scenic and visual resources).

For these reasons, I am asking Commissioners to deny this LCP Amendment and ask the City of Eureka to consider an alternative, more safe and less sensitive site to place these trailers. Instead of rezoning this parcel to a CS-Q zone, the Crowley site should be designated as a Natural Resource (NR) or Open Space (OS) zone to preserve it from inappropriate development and allow it to be restored and protected for its intrinsic habitat values.

Sincerely, Kimberly Tays

Below are photos of the dilapidated trailers that would be placed on the Crowley site.



The photo below shows 7 of the 11 trailers that would be put on the Crowley site. The size and bulk of the trailers would take up a lot of space on the 0.6-acre wetland site.



The photo below shows what looks like air conditioning units on the trailers. If air conditioners are used on the Crowley site, this will create a lot of noise pollution that will impact wildlife and trail users.



This photo below shows the black plastic sheeting between trailers that has torn loose, exposing the inside of the trailers to the elements.



Below are 3 photos of the Crowley site. As you can see, there is a lot of mature, native wetland vegetation intact on this parcel, which provides beautiful habitat for birds, aquatic species and other critters. The goal for the Crowley site should be one of restoration, so this wetland/ESHA environment can be enhanced. When these photos were taken, there was a lot of bird activity and bird song on the property. The peace and quiet of this area would be permanently impacted with 40 people living here.





Below is a photo of Humboldt Bay. The Crowley Site is directly behind this scene. As a community, we should strive to protect this beautiful bay setting and restore and enhance the wetland ecosystem on the Crowley site, not inflict it with more damaging development that would degrade the natural beauty and visual resources of this area.



From: [Kenyon, Cristin@Coastal](mailto:Kenyon.Cristin@Coastal)
To: [Merrill, Bob@Coastal](mailto:Merrill.Bob@Coastal); [Robinson, Aurora@Coastal](mailto:Robinson.Aurora@Coastal)
Subject: Fwd: California Adopts New, Welcome Wetlands Protection Rules - Legal Planet
Date: Thursday, October 1, 2020 5:22:42 PM

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From: Ann White <steppy999@gmail.com>

Sent: Thursday, October 1, 2020 2:35:27 PM

To: Kenyon, Cristin@Coastal <Cristin.Kenyon@coastal.ca.gov>

Subject: California Adopts New, Welcome Wetlands Protection Rules - Legal Planet

<https://legal-planet.org/2019/04/04/california-adopts-new-welcome-wetlands-protection-rules/>

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Hi Cristin! Would you please distribute this article to the Coastal Commissioners. I will be sending my letter shortly. Ann White

This week California's State Water Resources Control Board adopted [important new rules to protect the state's remaining wetlands resources](#). Enacted after over a decade of Board hearings, workshops and deliberation, those rules are overdue, welcome and critically necessary. Their adoption is particularly timely now, given the Trump Administration's wholesale assault on and erosion of federal programs designed to protect our nation's wetlands under the federal Clean Water Act (CWA).



The new California rules, adopted unanimously by the Board on April 2nd, create a new, statewide definition of wetlands. They are also designed to provide consistency in the way the State and nine regional Water Boards limit and/or preclude development of wetlands, bays, estuaries and coastal lagoons. Critically, the state regulatory program also protects seasonal wetlands and vernal pools that don't qualify for federal protection under applicable federal court decisions. Decades after former California Governor Pete Wilson declared a state policy "no net loss" of California wetlands, the newly-adopted Board rules formalize that policy and, indeed, promote an *increase* in the quantity, quality and sustainability of state wetlands.

The Board's action comes none too soon. 170 years of filling and development projects have reduced California's historic wetlands resources by 90%. The depletion of the state's coastal wetlands is even more alarming: fully 95% of California's coastal wetlands have been destroyed. It was only in recent years, after the vast amount of this environmental destruction had already occurred, that scientists, policymakers and the general public came to realize the multifaceted ecological and human benefits of wetlands. They provide flood protection, filtration of water pollutants, surface and groundwater supplies, wildlife habitat, open space, public recreational opportunities and more.

Many observers thought that Congress fixed this problem on a national basis when it passed the federal CWA in 1972. Specifically, section 404 of the Act created a new federal regulatory program, jointly administered by the U.S. Environmental Protection Agency and the U.S. Army Corps of Engineers, to regulate and limit the “dredging and filling” of American wetlands.

But the CWA’s so-called “404 program” was mired in controversy and litigation from the start. Nearly a half century after its creation, the 404 program has been one of the most heavily litigated—and certainly the most politically contentious—feature of the entire CWA. A key problem is that the Act fails to contain a clear legal delineation of what are, and are not, wetlands subject to federal regulation. That has left this critical, threshold issue to be debated and contested on a case-by-case, project-by-project basis.

The nadir of this national state of affairs was the U.S. Supreme Court’s infamous 2006 decision in [Rapanos v. United States](#). In that case, no five justices could agree on the legally-applicable definition of “wetlands” under the CWA. Recognizing the regulatory and public uncertainty that would result from the Court’s non-decision in *Rapanos*, Chief Justice Roberts in [a concurring opinion](#) criticized federal regulators’ prior unwillingness to promulgate a regulatory definition of wetlands and implicitly entreated them to clarify the situation prospectively.

That didn’t happen, for nearly a decade.

The George W. Bush administration never mustered the political will to try, and the Obama administration didn’t bother to do so until near the end of its time in office, when it adopted the so-called “Waters of the United States” (WOTUS) rule in 2015.

Multiple federal lawsuits challenging the WOTUS rule followed immediately. And it simultaneously became a political football, especially in the 2016 presidential campaign. Fulfilling a campaign promise, [President Trump signed an executive order](#) a month after his inauguration directing his staff to repeal the Obama administration’s WOTUS rule and replace it with one that is much more developer friendly and quite inhospitable to national wetlands. That rulemaking process is underway.



Hamilton Wetlands Preserve, Marin County, CA.
Photo courtesy of Marin Stock Photo.

In light of this dispiriting history of federal wetlands policy, California's newly-adopted wetlands rules are a critically-important means of filling the federal regulatory gap—at least with respect to wetlands located in the Golden State. And the California rules may well serve as a model for other states who also desire to preserve their own remaining wetlands in the face of prior federal inaction and current, overt federal hostility towards wetlands preservation. (Critically, states have *broader* legal authority to regulate and protect wetlands than does the federal government, given constitutional limits on the scope of federal regulatory authority announced in U.S. Supreme Court decisions.)

Two final points: first, this was the State Water Resources Control Board's first important formal decision since the five-member Board was reconstituted in the first month of California Governor Gavin Newsom's administration. Many observers wondered if Newsom's replacement of former Board Chair Felicia Marcus portended a less environmentally-sensitive Board in the future. So far, so good: last week's vote on the new state wetlands rules—adopted in the face of fierce opposition from the developer and business communities—is an encouraging early sign that those fears may have been misplaced.

Second, this is precisely the type of bold, strategic and effective action the California Legislature and regulators should be taking in the face of the Trump Administration's multifaceted, alarming efforts to roll back environmental standards and despoil public lands. In the 2017-18 legislative session, a well-intentioned but problematic bill was proposed to adopt as California state law a broad array of federal environmental standards in effect at the time the Obama administration left office in January 2017. (That bill, [SB 1](#), failed passage.) The Water Board's adoption of new and protective state wetlands rules is a more surgical and effective approach that provides a model for future state regulatory efforts to counteract federal environmental rollbacks generally. (The California Legislature did something similarly creative in 2018, when it enacted legislation prohibiting the California Coastal Commission and State Lands Commission from approving any onshore or nearshore oil and gas industry support facilities for potential oil and gas leasing and development of federal OCS ocean resources off the California coast, as is currently proposed by the Trump administration.)

Kudos to the State Water Resources Control Board for its adoption of new state rules to preserve California wetlands, thereby trumping the Trump administration's efforts to weaken wetlands protections. That strategy should be replicated by California lawmakers and regulators in a variety of other environmental contexts, to fill the regulatory gaps being left far and wide by the Trump administration.

From: [Kenyon, Cristin@Coastal](mailto:Kenyon.Cristin@Coastal)
To: [Merrill, Bob@Coastal](mailto:Merrill.Bob@Coastal); [Robinson, Aurora@Coastal](mailto:Robinson.Aurora@Coastal)
Subject: Fwd: Crowley site opposition
Date: Thursday, October 1, 2020 5:22:56 PM

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From: ann White <steppy999@gmail.com>
Sent: Thursday, October 1, 2020 2:47:58 PM
To: Kenyon, Cristin@Coastal <Cristin.Kenyon@coastal.ca.gov>
Subject: Fwd: Crowley site opposition

please disribute my email to the Coastal Commissioners for the upcoming Oct. 9 meeting.”

Dear Coastal Commissioners,

I am writing in opposition to the proposed development of the Crowley site. The project is simply in the wrong place. First of all there are 3 identified wetlands on the property that would be seriously harmed from this housing project and conflict with Coastal Act section 30121.

The Crowley site now provides habitat that supports birds, mammals, amphibians, snakes and insects. It is imperative that we preserve what is left of our wetlands for the sake of wildlife, whose numbers are declining rapidly. Building on the Crowley site would contribute even more to habitat loss that we cannot afford.

Humboldt Bay is a wildlife corridor and is on the path of the Pacific Flyway, giving migrating birds as well as resident birds a place to rest, feed and breed. Birdwatchers come from all over the world to see our birds on the Bay, especially during Godwit Days. Herons and hawks that live in the area depend on the wetlands for food. Wetlands also provide habitat for frogs and other amphibians that feed herons, hawks and other birds.

Human activities and noise from the housing development will be disruptive to birds and other wildlife and lead to stress, lower breeding numbers and can lead to eventual death. Lighting will also contribute considerable impacts to the surrounding wetland areas. Exterior security lighting (which is meant to be bright) is detrimental to nocturnal wildlife and will disturb nesting and resting birds. Lighting also confuses and kills insects—this is food that birds depend on for their survival. Harbor seals are known to bring their pups on the shore while they feed, and Mother Harbor seals will abandon their pups if they are disturbed by human or pet activities. Sea lions and Elephant seals also haul out to molt and rest, using the shoreline on Humboldt Bay. Developing the Crowley site so intensively will disturb this web of life and the balance of nature.

All of the construction for a sewer and utilities, clearing and paving of the land and placement of the trailers will cause lasting damage to this last bit of wetlands along Humboldt Bay. The Crowley site needs to be preserved, not built on, because the site is relatively healthy for wildlife now. Much of the property is filled with native plants and, aside from the need to remove Pampas grass, is a worthy of restoration and protection.

I have concerns about the trailers coming from the Humboldt Bay Nuclear Power Plant where they were used as offices. Also, the trailers have been sitting on the north end of the Crowley site for around 3 years. I have to wonder if the trailers are even safe for habitation. I noticed that the trailers are open to the elements, as it seems the rain can enter from the exposed openings. The trailers are old and in poor condition and may contain mold. Although the project is supposed to be temporary, I recall former City Manager Greg Sparks being interviewed by the local TV news station after a city council meeting, telling the news people that he hoped the facility would be permanent. If the trailers are moldy or uninhabitable, will the City be allowed to build a permanent 55-foot tall apartment building, as the LUP states? I am afraid this project will open the door and pave the way for more builders that want to build high-rise projects on Humboldt Bay.

The Crowley site is an environmentally sensitive area (per Coastal Act section 30107.5), and development should not be allowed here, as the loss of the wetlands would be disastrous for wildlife. Already when you walk down the trail, the imbalance and disharmony between the beautiful bay and industrial development is striking.

A lot of hard work, time and money went into creating a trail that gives residents and visitors a soothing place to walk or ride bikes and observe the native plants and wildlife along the Bay. Putting an unsightly trailer park on this site would ruin the scenic and visual character of the Bay and conflict with Coastal Act section 30251, because the trailer development would be visible from the trail and Bay.

The Crowley site is not suitable for the inhabitants of the facility either, because the trailers

would sit in a Tsunami and flood zone and on earthquake faults. The housing facility should be placed in a safer location outside such a hazardous location.

The project goes against most of the protections for coastal resources that the Coastal Commission is trusted to preserve. Our wetlands need to be preserved for the birds, wildlife and our future generations. If there are any zoning changes, the Crowley site should be zoned Open Space to allow us to preserve and bring back to life a missing piece of the wetlands puzzle. We need more open space along the Bay, not less, to right the wrongs that have been done to this special environment.

I oppose this project at the Crowley site. Please do not approve the City of Eureka's LCP Amendment that would allow this project to be developed on the Crowley site.

Ann White

From: [Kenyon, Cristin@Coastal](mailto:Kenyon.Cristin@Coastal)
To: [Merrill, Bob@Coastal](mailto:Merrill.Bob@Coastal); [Robinson, Aurora@Coastal](mailto:Robinson.Aurora@Coastal)
Subject: Fwd: Crowley property
Date: Thursday, October 1, 2020 5:23:25 PM

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From: ann White <steppy999@gmail.com>
Sent: Thursday, October 1, 2020 4:07:53 PM
To: Kenyon, Cristin@Coastal <Cristin.Kenyon@coastal.ca.gov>
Subject: Fwd: Crowley property

Hi Cristin! Please distribute these photos along with my letter. Distribute to all the Coastal Commissioners. Ann White

- #1 Humboldt Bay view looking West from the Crowley site.
- #2 Crowley site. Proposed
- #3 Crowley site. Proposed
- #4 View on North portion of the Crowley site where trailers are. Current
- #5 Photo on one of the trailers currently on the Crowley site. The trailers are on the North portion. Current

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PUBLIC HEARING
A Project has been proposed for this address
and the City will hold a public hearing.
For more information call 707-441-4160 or visit:
<http://www.ci.eureka.ca.gov/publichearings>









From: [Kenyon, Cristin@Coastal](mailto:Kenyon.Cristin@Coastal)
To: [Merrill, Bob@Coastal](mailto:Merrill.Bob@Coastal); [Robinson, Aurora@Coastal](mailto:Robinson.Aurora@Coastal)
Subject: Fwd: Opposition to City Of Eureka LCP Amendment LCP-1-EUR-20-0009-1, Part C (Crowley Site Re-designation)October 9, 2020, Agenda Item F8a
Date: Thursday, October 1, 2020 5:26:44 PM

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From: Robert Franks <rfranks210k@outlook.com>
Sent: Thursday, October 1, 2020 5:20:12 PM
To: Kenyon, Cristin@Coastal <Cristin.Kenyon@coastal.ca.gov>
Subject: Opposition to City Of Eureka LCP Amendment LCP-1-EUR-20-0009-1, Part C (Crowley Site Re-designation)October 9, 2020, Agenda Item F8a

Please distribute to all Coastal Commissioners. R Franks
Sent from [Mail](#) for Windows 10



ever-expanding steps, has slowed the process all while the governor has ramped up pressure on municipalities to find housing solutions.

"I'd like us, if possible, to keep a fire under our butts," Arroyo said, before clarifying that staff has already worked diligently to see the site completed. "(We should) push forward with the political will to say, 'We're going to do this even if the Coastal Commission staff doesn't really like it.'"

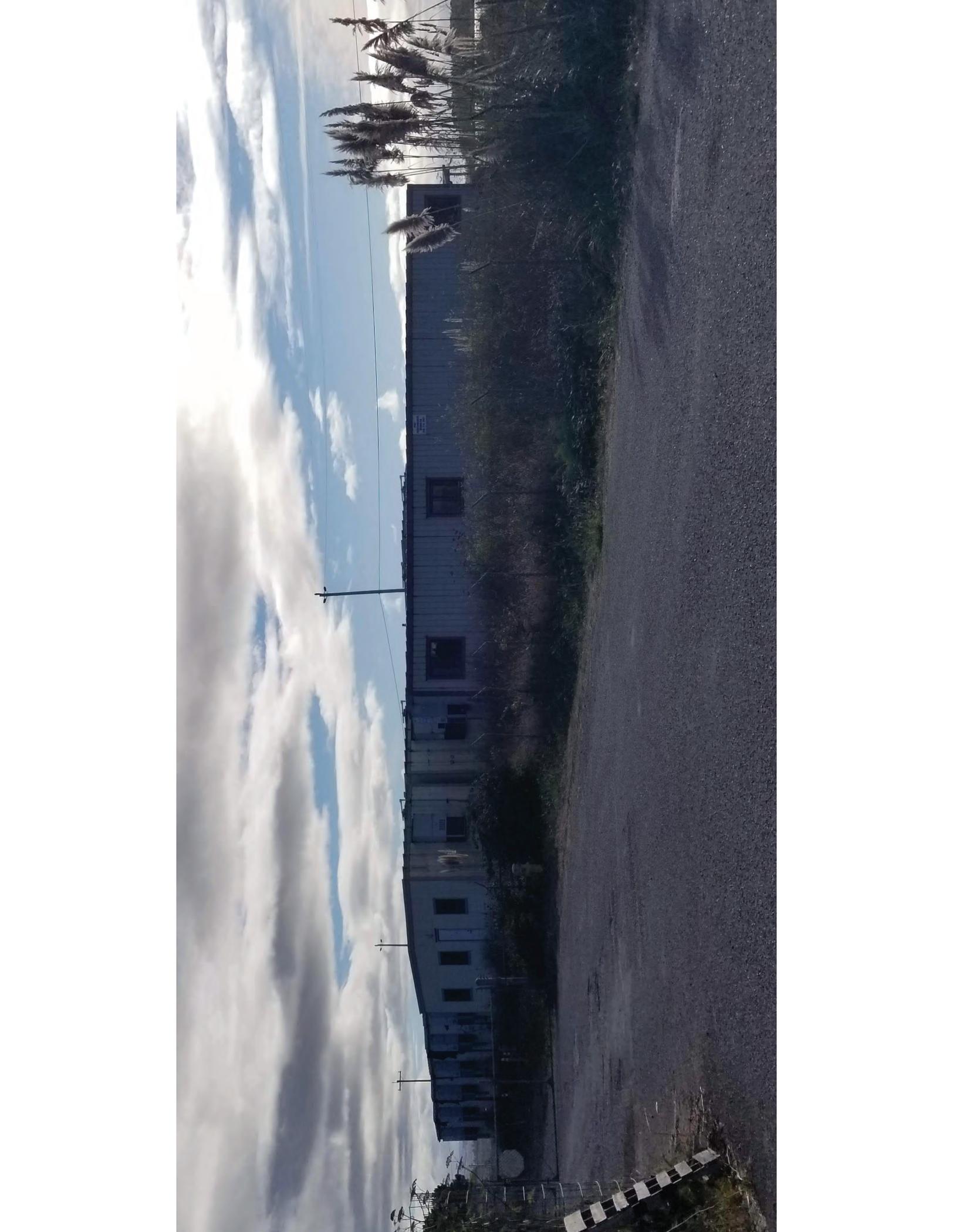
Shomik Mukherjee can be reached at 707-441-0504.

From: [Kenyon, Cristin@Coastal](mailto:Kenyon.Cristin@Coastal)
To: [Robinson, Aurora@Coastal](mailto:Robinson.Aurora@Coastal); [Merrill, Bob@Coastal](mailto:Merrill.Bob@Coastal)
Subject: Fwd: Crowley
Date: Thursday, October 1, 2020 7:32:49 PM

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From: ann White <steppy999@gmail.com>
Sent: Thursday, October 1, 2020 5:44:14 PM
To: Kenyon, Cristin@Coastal <Cristin.Kenyon@coastal.ca.gov>
Subject: Fwd: Crowley

Hi Kristen! Please distribute these photos to the Coastal Commissioners for the October 9 meeting. Add them to my letter and other photos. Thank you! Ann White









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