

**CALIFORNIA COASTAL COMMISSION**

NORTH COAST DISTRICT OFFICE  
1385 EIGHTH STREET, SUITE 130  
ARCATA, CALIFORNIA 95521-5967  
(707) 826-8950 FAX (707) 826-8960  
www.coastal.ca.gov

**F7**

**Prepared February 07, 2020 (for the February 14, 2020 Hearing)**

**To:** Commissioners and Interested Parties  
**From:** Alison Dettmer, North Coast District Deputy Director  
**Subject:** **North Coast District Deputy Director's Report for February 2020**

The following coastal development permit (CDP) waivers, immaterial CDP amendments, CDP extensions, and emergency CDPs for the North Coast District Office are being reported to the Commission on February 14, 2020. Pursuant to the Commission's procedures, each item has been appropriately noticed as required, and each item is also available for review at the Commission's North Coast District Office in Arcata. Staff is asking for the Commission's concurrence on the items in the North Coast District Deputy Director's report, and will report any objections received and any other relevant information on these items to the Commission when it considers the report on February 14th.

With respect to the February 14th hearing, interested persons may sign up to address the Commission on items contained in this report prior to the Commission's consideration of this report. The Commission can overturn staff's noticed determinations for some categories of items subject to certain criteria in each case (see individual notices for specific requirements).

**Items being reported on February 14, 2020 (see attached)**

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**Waivers**

- 1-19-1051-W, Caltrans – Rehabilitation of 5.6-Mile Stretch of Highway 101(Highway 101 between Tompkins Hill Road and Herrick Avenue, in Fields Landing and King Salmon, Humboldt County)

**Immaterial Extensions**

- A-1-MEN-01-051-A1-E7, Tan – Single Family Residence - Extension (17230 Ocean Drive, South of Fort Bragg, Mendocino County)

**Emergency Permits**

- G-1-19-0057, Sequoia Investments X, LLC, Fairhaven Dock Fuel Pipeline Removal (Along Humboldt Bay, At 1900 Bendixon St., Fairhaven, Humboldt County)
- G-1-20-0009, County of Del Norte & CDFW – Breaching of Sandbar Between Lake Earl Lagoon Complex And The Pacific Ocean, Del Norte County)
- G-1-20-0006, White Sail Trust – Removal of Portion of Deck over Tidelands (At 45200 Port Road, Point Arena)

**Emergency Permit Waivers**

- G-1-20-0001-W, Caltrans Eucalyptus Tree Trimming/Removal (Along Eureka-Arcata Highway 101 Corridor, Between Airport Road and Indianola Cutoff, Humboldt County)

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February 3, 2020

## 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:** 1-19-1051-W

**Applicant:** California Department of Transportation, District 1

**Location:** An approximately 5.6-mile stretch of Highway 101 between post mile (PM) 69.9 south of Tompkins Hill Road and PM 75.2 north of Herrick Ave., including on and off ramps at Fields Landing and King Salmon and two Park and Ride parking lots near Spruce Point and Herrick, just south of the City of Eureka, Humboldt County.

**Proposed Development:** (1) Restore pavement, including (a) repair and seal localized roadway failures and cracks; (b) place new asphalt and replace asphalt dikes along ramps and parking lots; (c) add or replace rumble strips along shoulders; and (d) restripe restored roadway; (2) place topsoil and native plant hydro-seed at an existing rock buttress (PM 72.5) to improve the visual quality of the site; (3) construct ADA ramps on Orchard Avenue in Fields Landing and a new crosswalk on the northbound off-ramp; (4) replace 10,380 feet of existing Metal Beam Guardrail (MBGR) with new Midwest Guardrail System (MGS); (5) extend new MGS an additional 437 feet beyond the existing MBGR length at various points; (6) replace existing 31-inch-tall Type 50 concrete median barrier with 36-inch-tall Type 60 concrete median barrier; (7) construct transition blocks at Spruce Point and Herrick Avenue over-crossings; and (8) construct new census stations within existing paved areas at Tompkins Hill Rd., Spruce Point, and Herrick Ave.

**Rationale:** The proposed development is needed to improve travel safety for motor vehicles, bicyclists, and pedestrians along an urban stretch of Highway 101 south of the Eureka city limits. All work will be completed within the existing highway right-of-way. The contractor will be required to implement appropriate water pollution control measures. A Spill Prevention and Control Plan will be developed by the contractor and approved by Caltrans prior to the commencement of work. Construction will employ standard erosion, runoff, and sediment control devices to control silt and exposed soils and to prevent any construction materials from inadvertently entering nearby riverine and aquatic habitats. Excavated soils with Aerially Deposited Lead (ADL) will be handled and disposed of consistent with state requirements. Caltrans biologists investigated the work site for the presence of wetlands, sensitive species, and other environmentally sensitive habitat areas, and no

**Coastal Development Permit De Minimis Waiver**  
1-19-1051-W

impacts to sensitive species or habitats will occur as a result of the project. For work adjacent to environmentally sensitive riparian and aquatic habitats, such as Salmon Creek and the Elk River, Caltrans will install temporary fencing to protect the adjacent aquatic habitats and associated riparian ESHA from construction encroachment impacts. To further protect fish habitat adjacent to the work site, Caltrans will avoid construction work from PMs 70.00 to 70.10 (near Salmon Creek) and from PMs 73.96 to 74.08 (near Elk River) between June 15<sup>th</sup> and November 15<sup>th</sup> and will shield and direct construction lighting (for any night-time construction) away from the fish habitat in these areas. To protect any bats that may be roosting under the Fields Landing and Tompkins Hill overpasses, no construction activities will occur at night beneath or adjacent to the underside of the bridges during the maternal roosting season of March 1<sup>st</sup> to September 15<sup>th</sup>. In general, any nighttime lighting that is used on work areas will be shielded and focused to minimize light spillage beyond the immediate construction zone. The project proposes no major vegetation removal, and all areas of disturbed soil will be seeded with a regionally appropriate California native seed mix. The project as proposed will have no adverse effects on visual resources, because (a) the guardrails and median barriers to be replaced will be similar to and not significantly taller than existing guardrails and median barriers, and (b) new guardrail extensions and anchor blocks will not be located in visually sensitive areas and will not block public views to and along the ocean or coastal scenic areas. Therefore, 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 its February 14, 2020 meeting 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.

Sincerely,

John Ainsworth  
Executive Director



Melissa Kraemer  
Supervising Analyst

cc: Humboldt County Planning & Building Dept.

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## NOTICE OF EXTENSION REQUEST FOR COASTAL DEVELOPMENT PERMIT

January 31, 2020

Notice is hereby given that Loke K. Tan has applied for a one year extension of A-1-MEN-01-051-A1 granted by the California Coastal Commission on November 15, 2006.

The approval granted construction of a 6,933-square-foot, two-story residence with an 8-square-foot attached garage, utility shed, driveway, water supply system from existing well, septic system and landscaping.

The project is located at 17230 Ocean Drive, Fort Bragg (APN: 017-330-10)

Pursuant to Section 13169 of the Commission Regulations, the Executive Director has determined that there are no changed circumstances affecting the proposed development's consistency with the Coastal Act. The Commission Regulations state that "if no objection is received at the Commission office within ten (10) working days of publishing notice, this determination of consistency shall be conclusive... and the Executive Director shall issue the extension." If an objection is received, the extension application shall be reported to the Commission for possible hearing.

Persons wishing to object or having questions concerning this extension application should contact the district office of the Commission at the above address or phone number.

Sincerely,

John Ainsworth  
Executive Director

A handwritten signature in cursive script that reads "Destiny Preston".

Destiny Preston  
Coastal Program Analyst II

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**EMERGENCY PERMIT**

Issue Date: December 18, 2019  
Emergency Permit No. G-1-19-0057

**APPLICANT:**

Sequoia Investments X, LLC  
Attn.: Tim Callison  
325 5<sup>th</sup> Street  
Eureka, CA 95501

**LOCATION OF EMERGENCY:**

1900 Bendixon Street, Fairhaven, CA 95565 (APN: 401-301-08)

**EMERGENCY WORK:**

Remove up to 452 linear feet of an existing 8-inch to 16-inch-diameter asbestos-lined steel pipe affixed underneath an industrial dock and across the shoreline. The pipeline was historically used to fuel ships berthed at the industrial dock. The pipe runs from the location of a former 40,000 gallon bulk fuel silo near the shoreline across a small beach area to the bottom of the dock, where it then extends out to the berthing area. The pipe is highly corroded and at risk of rupture and spillage of up to 430 gallons of residual oil within the pipe. Residual wet oil has recently been confirmed to be present in the landward, lowest portion of the pipe near the beach. Removal work will begin at the bayward, highest portion of the pipe (the segment that runs beneath the berthing portion of the dock and which is not expected to contain residual wet oil), and removal will proceed along three pipe segments: (1) first, an approximately 150-foot-long segment that runs north-south along the berthing area of the dock; (2) second, an approximately 275-foot-long segment that runs east-west along the southern side of the dock; and (3) third, the remaining segment, which extends from the landward end of the dock, across the tidal zone and onto the upland portion of the property.

Prior to any removal, the existing valve box assembly at the bayward end of the pipe will be removed to allow for filming of the interior of the pipe to confirm whether residual wet oil or crusted oil is present in the pipe segment. Also, the 1.5-inch-thick asbestos panels that line the pipe segment will be removed to allow for a structural inspection to determine whether the pipe retains sufficient integrity to allow for flushing. This filming, asbestos-panel removal, and structural inspection and testing process will be carried out prior to removal of pipe segments.

If pre-removal filming determines that wet residual oil is present in a pipe segment, and if, after the asbestos panels are removed, the inspection and testing determine that the pipe retains sufficient integrity to allow for flushing, the pipe will be flushed to clean out the residual wet oil prior to pipe removal. Any flushed water will be routed to the existing 6-foot by 8-foot by 8-foot (2,873-gallon) industrial vault located at the landward end of the pipe,

and then pumped to and contained within a portable 100,000 gallon Baker Tank that will be brought onsite for this purpose. The flushed water will be characterized to determine whether it meets the classification of hazardous waste material, and if so, it will be hauled offsite for disposal at an authorized facility capable of receiving such material. If not, it will be hauled offsite for disposal at the City of Eureka's wastewater treatment facility.

After flushing, removal of the pipe will involve cutting the pipe in 6-foot to 10-foot segments for removal. Any crusted oil found in the pipe will be removed offsite and placed in 55-gallon drums for disposal at an authorized facility capable of receiving such material. Removal of the pipe segments below the dock will require the use of knuckle boom equipment with a 4-foot by 8-foot-long basket positioned directly under the pipe removal work site. The basket will be lined with two layers of Visqueen plastic sheeting or similar material as a containment measure. Tarps or other material will be hung beneath the pipe removal area to catch any falling debris during removal. Oil spill kits also will be maintained on site in the event of an accidental spill.

If it is determined that a pipe segment would not be able to withstand the pressure of flushing, the pipe may be cleaned out using a hose connected to a vacuum truck. The evacuated liquid would be sucked into a tank on the truck. Following the vacuum removal of liquids, the pipe would be cleaned to remove any residual wet fuel oil by pulling a small-diameter brush-type head with high pressure water jets (or similar device) through the pipe (the use of jetted water would depend on the integrity of the pipe). The water created from this process would be collected by a vacuum truck with a suction hose. Once most of the residual fuel oil is removed, a final cleaning would be performed by pushing a solid pipeline pig through the pipe, removed by a vacuum truck with residual liquids and or debris pushed ahead of the pig.

If it's not possible to retain the equipment needed for the vacuum evacuation process described above, the pipe would be resealed and wrapped in multiple layers of plastic sheeting or similar material. No further action would be taken until a specialist is consulted to develop an oil pipe removal plan.

This letter constitutes approval of the emergency work you or your representative has requested to be done at the location listed above. I understand from your information that an unexpected occurrence in the form of the recent discovery of residual wet oil and excessive corrosion of the western (landward) portion of the pipe that is partially within the beach intertidal zone and highly vulnerable to breakage from high tides and wave action poses a threat to the marine organisms and the water quality of Humboldt Bay. The situation requires immediate action to prevent or mitigate loss or damage to life, health, property or essential public services pursuant to 14 Cal. Admin. Code sec. 13009. The Executive Director of the California Coastal Commission hereby finds that:

- (a) An emergency exists that requires action more quickly than permitted by the procedures for administrative or ordinary coastal development permits (CDPs), and that the development can and will be completed within 30 days unless otherwise specified by the terms of this Emergency Permit; and
- (b) Public comment on the proposed emergency development has been reviewed if time allows.

The emergency work is hereby approved, subject to the conditions listed on the attached pages.

Sincerely,

John Ainsworth  
Executive Director

A handwritten signature in black ink, appearing to read "Melissa B. Kraemer". The signature is fluid and cursive, with the first name "Melissa" being the most prominent part.

By: Melissa B. Kraemer  
Supervising Analyst

ec: Humboldt County Planning and Building Department (Steve Werner)  
Humboldt Count Dept. of Environmental Health (Ben Dolf, Mario Kalson, Matt Swoveland)  
Humboldt Bay Harbor, Recreation, and Conservation District (Adam Wagschal)  
California Department of Fish & Wildlife OSPR Program (Jeff Dayton)  
North Coast Regional Water Quality Control Board (Tom Magney)  
U.S. Coastal Guard, Sector Humboldt Bay (Adam Shilts)  
Coastal Commission Oil Spill Program Coordinator (Jonathan Bishop)

Encl.: Acceptance Form

**CONDITIONS OF APPROVAL:**

1. The enclosed Emergency Permit Acceptance form must be signed by the PROPERTY OWNER and returned to our office within 15 days.
2. Only that work specifically described in this permit (and as described in the work plan by Wahlund Construction, Inc. dated 12/10/2019, and follow-up emails with agent Northpoint Consulting Group, Inc.), and for the specific property listed above, is authorized. Any additional work beyond the scope of the requested emergency work requires separate authorization from the Executive Director.
3. All work shall take place in a time and manner to minimize any potential damages to any resources, including intertidal species, and to minimize impacts to public access.
4. The work authorized by this permit must be completed within 60 days of the date of this permit, which shall become null and void unless extended by the Executive Director for good cause.
5. The following work procedures and construction Best Management Practices (BMPs) shall be implemented:
  - a. NO LESS THAN THREE (3) DAYS PRIOR TO COMMENCEMENT OF ANY PIPE INSPECTION AND REMOVAL WORK, the Permittee shall notify all of the following agencies about commencement of the emergency project: (i) the U.S. Coast Guard Sector Humboldt Bay; (ii) the Humboldt Bay Harbor, Recreation, and Conservation District; and (iii) the Office of Spill Prevention and Response of the California Department of Fish and Wildlife, Eureka Field Office. Phone numbers of each agency shall be maintained by the required monitor [see (g) below] at the work site throughout the duration of the authorized emergency work. Notification shall include the anticipated work schedule and the location/coordinates of the emergency work site.
  - b. PRIOR TO COMMENCEMENT OF ANY PIPE INSPECTION AND REMOVAL WORK, a containment boom shall be installed within tidal and submerged areas of Humboldt Bay around dock work areas to contain oil and debris if released prior to pipeline inspection from the dock, during any pipeline flushing activities, or during removal efforts. The area boomed can be reduced as the pipeline removal work proceeds shoreward during decommissioning.
  - c. PRIOR TO COMMENCEMENT OF ANY PIPE INSPECTION AND REMOVAL WORK, the applicant shall provide evidence of contract with a local oil spill response organization (OSRO) who shall be immediately available to respond during the work window (i.e., either on site or not committed to another job during the time of



emergency removal work). The OSRO should be contracted to install the required boom and also may be contracted for monitoring.

- d. PRIOR TO COMMENCEMENT OF ANY PIPE INSPECTION AND REMOVAL WORK, the applicant shall consult with the Humboldt County Department of Environmental Health and comply with all applicable requirements for hazardous waste management, including handling, characterization, disposal, and recordkeeping.
- e. PRIOR TO COMMENCEMENT OF ANY PIPE INSPECTION AND REMOVAL WORK, the applicant shall recover from shore with a vacuum truck and/or sorbent materials wet oil in the pipeline that has already been identified in the landward end of the pipe.
- f. To the maximum extent feasible, pipe removal work shall occur only during periods of low or slack tides.
- g. The Permittee shall have a qualified biologist onsite during the authorized emergency work to minimize the potential for impacts to sensitive shoreline areas, eelgrass habitat, and bay waters. The biologist shall be present for the duration of the authorized removal work, shall ensure that emergency contracted personnel are adhering to all required BMPs, and shall report all oil spills as required by condition 5-i below. The biologist shall document his/her observations in writing, including with respect to any biological and or oil spill notification/reporting issues that arise during the emergency activities, and this documentation shall be submitted to the Executive Director within 30 days of completion of the authorized emergency work.
- h. Adequate oil spill kit(s) shall be available onsite at all times to address any small spills or leaks.
- i. All oil spills shall be immediately reported to the State Office of Emergency Services Warning Center (1-800-852-7550) and the National Response Center (1-800-424-8802).
- j. The knuckle-boom equipment basket holding work crew personnel shall be positioned directly beneath pipe removal work area during pipe segment removal work, and the basket shall be lined with a minimum of two layers of Visqueen or similar material as a precautionary containment measure.
- k. Tarps or other similar material shall be hung beneath the pipe removal work area to catch any falling debris during removal.
- l. All asbestos material shall be handled, and asbestos work performed, according to all applicable state agency (e.g., California Air Resources Board) and federal agency (e.g., Environmental Protection Agency) requirements.

- m. Prior to cutting and removal of pipe segments, the pipe segment shall be wrapped in multiple layers of Visqueen plastic sheeting or similar material as a containment measure.
- n. Removal of crusted oil from cut pipe segments shall occur offsite only. Any crusted oil removed from pipes shall be placed in 55-gallon drums and promptly removed offsite for disposal at an authorized facility capable of receiving such material.
- o. Any flushing of the pipe shall occur only after a thorough inspection of the entire pipeline has been completed to verify the pipe's structural integrity.
- p. Flushed effluent shall be contained in the proposed temporary portable tank for settling. Oil shall be skimmed and placed in 55-gallon metal drums or similar containers and promptly removed offsite for disposal at an authorized facility capable of receiving such material. All flushed water shall be hauled offsite for disposal at an authorized facility capable of receiving such material.
- q. If a vacuum truck is used to suck oil residue from pipe, all residual liquids and cleaning effluent shall be appropriately contained, characterized, and removed from the site for disposal at an authorized facility capable of receiving such material.
- r. If both flushing and vacuuming are not possible, pipe segments that contain wet residual oil shall be wrapped in extra (at a minimum three) layers of plastic sheeting or similar material and no further action shall be taken until a specialist is consulted to develop an oil pipe removal plan. Separate permit authorization will be required to implement the plan.
- s. The construction site shall maintain good construction site "housekeeping" controls and procedures, including, but not limited to, immediate cleanup of all leaks, drips, and other spills; keep stockpiles covered in the event of rain; proper disposal of all waste and construction debris; removal of all construction debris from the area upon completion of the authorized removal work.
- t. Appropriate temporary erosion, runoff, and sediment control BMPs shall be installed around staging areas, stockpiling areas, and the portable tank and shall be maintained for the duration of emergency construction activities.
- u. Any discharge of materials, polluted runoff, or wastes to the bay is prohibited.
- v. No equipment washing, refueling, or servicing shall occur on the beach or dock structure. Equipment refueling and maintenance shall occur at least 100 feet from coastal waters and storm drain inlets.
- w. The Permittee shall ensure that all contractors and work crews are carefully briefed on the importance of adhering to the terms and conditions of this permit given the sensitive work environment.

6. WITHIN NINETY (90) DAYS OF ISSUANCE OF THIS PERMIT, the applicant shall submit a Final Report to the Executive Director clearly describing all development completed under the emergency permit. The Final Report shall include, at a minimum, all of the following: (a) evidence of compliance with the notifications requirements of conditions 5-a through 5-d above; (b) narrative description of all emergency work undertaken; (c) comparison of the site under emergency conditions to the post-work condition; (d) quantification of the amount of pipe and other materials (e.g., drums, tanks, flushed water, etc.) removed from the site; (e) description of hazardous waste materials generated by the emergency work, characterization of waste, and location of disposal site for waste disposal; (f) schedule for disposal /removal from site of all waste and construction debris; (g) written daily observations of the monitor [see condition #5(b) above]; (h) photos showing the project site before, during, and after the work authorized by the emergency permit; and (i) an assessment of whether the emergency work resulted in habitat impacts that necessitate restoration, including, but not limited to, revegetation, recontouring, or other work. With submittal of the Final Report, a determination would be made by the Executive Director as to whether a follow up coastal development permit will be required to permanently authorize any of the development constructed or installed under the emergency permit and/or for any required habitat restoration.
7. The applicant recognizes that any development installed as part of the emergency work is considered temporary and subject to removal unless and until a regular coastal development permit permanently authorizing the work is approved. A regular permit would be subject to all of the provisions of the California Coastal Act and may be conditioned accordingly. These conditions may include provisions for public access (such as offers to dedicate, easements, in-lieu fees, etc.) and/or a requirement that a deed restriction be placed on the property assuming liability for damages incurred from storm waves.
8. In exercising this permit, the applicant agrees to hold the California Coastal Commission harmless from any liabilities for damage to public or private properties or personal injury that may result from the project.
9. This permit does not obviate the need to obtain necessary authorizations and/or permits from other agencies, including but not limited to the California Department of Fish & Wildlife, U.S. Fish & Wildlife, U.S. Army Corps of Engineers, and the California State Lands Commission.
10. Within ninety (90) days of issuance of this Emergency Permit, or as extended by the Executive Director through correspondence, for good cause, the applicant shall either: (a) remove all of the materials placed or installed in connection with the emergency development authorized in this Permit and restore all affected areas to their prior condition after consultation with California Coastal Commission staff, and consistent with the Coastal

Act. [In some instances, a permit may be needed for removal]; or (b) submit a complete follow-up Coastal Development Permit (CDP) that satisfies the requirements of Section 13056 of Title 14 of the California Code of Regulations. If the Executive Director determines that the follow-up CDP application is incomplete and requests additional information, the applicant shall submit this additional information by a certain date, as established by the Executive Director. If such a follow-up CDP application is withdrawn by the applicant or is denied by the Commission, or if the follow-up CDP application remains incomplete for a period of 120 days after the Executive Director informs the applicant that the application is incomplete, the emergency-permitted development shall be removed and all affected areas restored to their prior condition, after consultation with CCC staff and consistent with the Coastal Act, within 180 days, subject to any regulatory approvals necessary for such removal. In some instances, a permit may be needed for removal.

11. Failure to (a) submit a complete follow-up CDP Application that complies with Condition 8 above, or (b) remove the emergency development and restore all affected areas to their prior condition after consultation with CCC staff, and consistent with the Coastal Act (if required by this Emergency Permit) by the date specified in this Emergency Permit<sup>1</sup>, or (c) comply with all terms and conditions of the required follow-up CDP, including any deadlines identified therein, or (d) remove the emergency-permitted development and restore all affected areas to their prior condition after consultation with CCC staff and consistent with the Coastal Act immediately upon denial of the required follow-up CDP<sup>2</sup> will constitute a knowing and intentional violation of the Coastal Act<sup>3</sup> and may result in formal enforcement action by the Commission or the Executive Director. This formal action could include a recordation of a Notice of Violation on the applicant's property; the issuance of a Cease and Desist Order and/or a Restoration Order; imposition of administrative penalties for violations involving public access; and/or a civil lawsuit, which may result in the imposition of monetary penalties, including daily penalties of up to \$15,000 per violation per day, and other applicable penalties and other relief pursuant to Chapter 9 of the Coastal Act. Further, failure to follow all the terms and conditions of this Emergency Permit will constitute a knowing and intentional Coastal Act violation.

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<sup>1</sup> In some instances, a permit may also be required for removal.

<sup>2</sup> As noted above, in some instances, a permit may also be required for removal.

<sup>3</sup> The Coastal Act is codified in sections 30000 to 30900 of the California Public Resources Code. All further section references are to that code, and thus, to the Coastal Act, unless otherwise indicated.

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## EMERGENCY PERMIT ACCEPTANCE FORM

TO: CALIFORNIA COASTAL COMMISSISON  
North Coast District Office  
1385 Eighth Street, Suite 130  
Arcata, California 95521-5967

RE: Emergency Permit No. G-1-19-0057

INSTRUCTIONS: After reading the attached Emergency Permit, please sign this form and return to the North Coast District Office within 15 working days from the permit's date.

I hereby understand all of the conditions of the emergency permit being issued to me and agree to abide by them.

I also understand that the emergency work is TEMPORARY and that a regular Coastal Development Permit is necessary for any permanent installation. I agree to complete the regular Coastal Development Permit application within 90 days of the date of the emergency permit or I will remove the emergency work in its entirety within 120 days of the date of the emergency permit. Finally, I understand that my failure either to:

- a) submit a complete follow-up Coastal Development Permit (CDP) Application that satisfies the requirements of Section 13056 of Title 14 of the California Code of Regulations by the date specified in this Emergency Permit, which date may be extended by the Executive Director for good cause, or
- b) Remove the emergency development and restore all affected areas to their prior condition after consultation with Coastal Commission staff as you identified consistent with the Coastal Act, will constitute a knowing and intentional violation of the Coastal Act and may result in formal enforcement action by the Commission or the Executive Director.

In some instances, a permit may be required for removal (if required by this Emergency Permit) by the date specified in this Emergency Permit. This formal action could include a recordation of a Notice of Violation on my property; the issuance of a Cease and Desist Order and/or Restoration Order; imposition of administrative penalties for violations involving public access, and/or a civil lawsuit, which may result in the imposition of monetary penalties, including daily penalties of up to \$15,000 per violation per day, and other applicable penalties and other relief pursuant to Chapter 9 of the Coastal Act. Further, failure to follow all the terms and conditions of this Emergency Permit will constitute a knowing and intentional Coastal Act violation.

\_\_\_\_\_  
Signature of Property Owner or  
Authorized Representative

Address: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_  
Print Name

\_\_\_\_\_  
Date of Signing

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**EMERGENCY PERMIT**

Issue Date: January 22, 2020  
Emergency Permit No. G-1-20-0009

**APPLICANTS:** The County of Del Norte and California Department of Fish and Wildlife

**LOCATION OF EMERGENCY:**

Sandbar between the Pacific Ocean and the Lake Earl/ Lake Tolowa lagoon complex (APN: 106-010-34)

**EMERGENCY WORK:**

Mechanically breach the sandbar between the Lake Earl/ Lake Tolowa lagoon complex and the Pacific Ocean.

This letter constitutes approval of the emergency work you or your representative has requested to be done at the location listed above. I understand from your information that an unexpected occurrence in the form of winter storms has resulted in rising lagoon levels that pose a flooding threat that requires immediate action to prevent or mitigate loss or damage to life, health, property or essential public services pursuant to 14 Cal. Admin. Code Section 13009. The Executive Director of the California Coastal Commission hereby finds that:

- (a) An emergency exists that requires action more quickly than permitted by the procedures for administrative or ordinary coastal development permits (CDPs), and that the development can and will be completed within 30 days unless otherwise specified by the terms of this Emergency Permit; and
- (b) Public comment on the proposed emergency development has been reviewed if time allows.

The emergency work is hereby approved, subject to the conditions listed on the attached pages.

Sincerely,

John Ainsworth  
Executive Director

A handwritten signature in black ink, appearing to read "Robert S. Merrill".

By: Robert Merrill, North Coast District Manager

Enclosures: 1) Acceptance Form;

**CONDITIONS OF APPROVAL:**

1. The enclosed Emergency Permit Acceptance form must be signed by the PROPERTY OWNER and returned to our office within 15 days.
2. Only that work specifically described in this permit and for the specific property listed above is authorized. Any additional work requires separate authorization from the Executive Director.
3. All work shall take place in a time and manner to minimize any potential damages to any resources, and to minimize impacts to public access. The emergency breaching shall be performed in the specific location and manner described in the emergency permit application, including, but not limited to, proposed protocols for flushing Western snowy plovers, brown pelican, and other birds from the breach site; and for surveying disconnected ponds of water remaining below the maximum elevation of the lagoon after the breach for tidewater gobies and anadromous salmonids and returning stranded fish to the main basin of the lagoon.
4. The sandbar shall be breached in the middle of the open sandy area and midway between the existing vegetated areas on either side of the breaching site.
5. The permittee shall monitor and document the following every month after the sand bar is breached until such time that the lagoon mouth closes again:
  - a. lagoon elevation;
  - b. location of the lagoon mouth relative to the breach location to determine if the mouth is migrating; and
  - c. depth of mouth of lagoon relative to the surrounding sand bar to determine how quickly the mouth is closing.

Documentation shall include at a minimum: (a) photographs of the breach site and current lagoon mouth at established photo points, (b) recordation of the lagoon level, (c) recordation of the time and date of the each data collection event, (d) an estimate of the location of the lagoon mouth relative to the breach location, and (d) an estimate of the depth of the mouth of lagoon relative to the surrounding sand bar. Monitoring results shall be submitted to the Executive Director each month after each data collection event with the documentation required above. The work authorized by this permit must be completed within 30 days of the date of this permit, which shall become null and void unless extended by the Executive Director for good cause.

6. The applicant recognizes that the emergency work is considered temporary and subject to removal unless and until a regular coastal development permit permanently authorizing the work is approved. A regular permit would be subject to all of the provisions of the California

Coastal Act and may be conditioned accordingly. These conditions may include provisions for public access (such as offers to dedicate, easements, in-lieu fees, etc.) and/or a requirement that a deed restriction be placed on the property assuming liability for damages incurred from storm waves.

7. In exercising this permit, the applicant agrees to hold the California Coastal Commission harmless from any liabilities for damage to public or private properties or personal injury that may result from the project.
8. This permit does not obviate the need to obtain necessary authorizations and/or permits from other agencies, including but not limited to the California Department of Fish & Wildlife, U.S. Fish & Wildlife, U.S. Army Corps of Engineers, and the California State Lands Commission.



# CALIFORNIA COASTAL COMMISSION

NORTH COAST DISTRICT OFFICE  
1385 EIGHTH STREET, SUITE 130  
ARCATA, CALIFORNIA 95521-5967  
PH (707) 826-8950 FAX (707) 826-8960  
WWW.COASTAL.CA.GOV



## EMERGENCY PERMIT ACCEPTANCE FORM

TO: CALIFORNIA COASTAL COMMISSISON  
North Coast District Office  
1385 Eighth Street, Suite 130  
Arcata, California 95521-5967

RE: Emergency Permit No. G-1-20-0009

INSTRUCTIONS: After reading the attached Emergency Permit, please sign this form and return to the North Coast District Office within 15 working days from the permit's date.

I hereby understand all of the conditions of the emergency permit being issued to me and agree to abide by them. Failure to follow all the terms and conditions of this Emergency Permit will constitute a knowing and intentional Coastal Act violation.

\_\_\_\_\_  
Signature of Property Owner or  
Authorized Representative

Address: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

\_\_\_\_\_  
Print Name

\_\_\_\_\_  
Date of Signing

**CALIFORNIA COASTAL COMMISSION**

NORTH COAST DISTRICT OFFICE  
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**EMERGENCY PERMIT**

Issue Date: January 23, 2020  
Emergency Permit No. G-1-20-0006

**APPLICANT:**

White Sail Trust (Attn: Vernon Blake Juntz)

**LOCATION OF EMERGENCY:**

45200 Port Road, Point Arena, CA 95468 (APN: 027-041-09)

**EMERGENCY WORK:**

Remove the seaward 290 square feet of a larger 1,276-square-foot deck and its supporting substructure and piles. The deck is attached to the former Coast Guard building adjacent to the north of the existing Point Arena Pier. The deck extends over tidelands. Deterioration of the wooden piles and storms have damaged the support substructure of the deck and removal of the seaward portion of the deck and piles is needed to keep the entire deck from collapsing during anticipated high tides and winter storm surge. The work will occur from the portion of the deck to remain. The portion of the deck to be removed will be tied off before it is severed off to limit the potential for debris to fall below to the ocean. The deck piles supporting the portion of the deck to be removed will be cut off at the mud line. The existing guard rail on the seaward portion of the deck will be removed and replaced along the new furthest seaward extent of the deck to ensure continued safety. No heavy equipment will be used, only hand tools. Tarps will be placed below the working area to collect any wood or fasteners that may fall during demolition. Deck debris will be recovered and loaded into a truck to be disposed of at an authorized inland facility. After a portion of the deck and its supporting piles are removed at the mud line, the remaining piles and substructure will be strengthened by adding bracing and replacing weaker joint plates. The scope of work can be completed at low tide and is estimated to take up to three days.

This letter constitutes approval of the emergency work you or your representative has requested to be done at the location listed above. I understand from your information that an unexpected occurrence in the form of previous storm damage to the support structure of the deck and anticipated high tides and storm surge from winter storms poses a threat to structures at 45200 Port Road, Point Arena and requires immediate action to prevent or mitigate loss or damage to life, health, property or essential public services pursuant to 14 Cal. Admin. Code section 13009. The Executive Director of the California Coastal Commission hereby finds that:

- (a) An emergency exists that requires action more quickly than permitted by the procedures for administrative or ordinary coastal development permits (CDPs), and that the development can and will be completed within 30 days unless otherwise specified by the terms of this Emergency Permit; and
- (b) Public comment on the proposed emergency development has been reviewed if time allows.

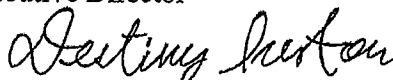
January 23, 2020

Emergency Permit No.: G-1-20-0006

The emergency work is hereby approved, subject to the conditions listed on the attached pages.

Sincerely,

John Ainsworth  
Executive Director

  
By: Destiny Preston, Coastal Planner

cc: Tom Marino (agent)  
City of Point Arena (Attn: Richard Shoemaker, City Manager)

Enclosures: 1) Acceptance Form;  
2) Regular Permit Application Form

January 23, 2020

Emergency Permit No.: G-1-20-0006

**CONDITIONS OF APPROVAL:**

1. The enclosed Emergency Permit Acceptance form must be signed by the PROPERTY OWNER and returned to our office within 15 days.
2. Only that work specifically described in this permit and for the specific property listed above is authorized. Any additional work requires separate authorization from the Executive Director.
3. All work shall take place in a time and manner to minimize any potential damages to any resources, including intertidal species, and to minimize impacts to public access.
4. The work authorized by this permit must be completed within 45 days of the date of this permit, which shall become null and void unless extended by the Executive Director for good cause.
5. To the maximum extent feasible, demolition and removal work shall occur only during periods of low or slack tides.
6. No heavy equipment shall be used.
7. Piles to be replaced or no longer used shall either be (a) removed in their entirety, or (b) cut off at the mud line and removed.
8. Any discharge of debris, polluted runoff, or wastes to tidal and submerged areas is prohibited. Tarps shall be placed below the working area to collect debris that may fall during demolition. All debris and waste that is discharged to tidal and submerged areas shall be immediately recovered and removed for disposal consistent with Condition 9 below.
9. No construction or demolition materials, debris, or waste shall be placed or stored where it may be subject to entering coastal waters or wetlands. All onsite stockpiles of demolition debris shall be contained at all times to minimize discharge of sediment and other pollutants. Inactive stockpiles (not used within 14 days) shall be covered and active stockpiles shall be covered prior to a forecasted rain event.
10. All waste and construction debris shall be removed the area upon completion of the authorized removal work and shall be disposed of at a disposal site outside the coastal zone or within the coastal zone pursuant to a valid coastal development permit. Any potentially hazardous waste materials shall be disposed of at an approved landfill that is equipped to handle hazardous waste.
11. No equipment washing, refueling, or servicing shall occur on the beach or deck structure. Equipment refueling and maintenance shall occur at least 100 feet from coastal waters and storm drain inlets.

12. The Permittee shall ensure that all contractors and work crews are carefully briefed on the importance of adhering to the terms and conditions of this permit given the sensitive work environment.
13. The applicant recognizes that the emergency work is considered temporary and subject to removal unless and until a regular coastal development permit permanently authorizing the work is approved. A regular permit would be subject to all of the provisions of the California Coastal Act and may be conditioned accordingly. These conditions may include provisions for public access (such as offers to dedicate, easements, in-lieu fees, etc.) and/or a requirement that a deed restriction be placed on the property assuming liability for damages incurred from storm waves.
14. In exercising this permit, the applicant agrees to hold the California Coastal Commission harmless from any liabilities for damage to public or private properties or personal injury that may result from the project.
15. This permit does not obviate the need to obtain necessary authorizations and/or permits from other agencies, including but not limited to the California Department of Fish & Wildlife, U.S. Fish & Wildlife, U.S. Army Corps of Engineers, and the California State Lands Commission.
16. Within 60 days of issuance of this Emergency Permit, or as extended by the Executive Director through correspondence, for good cause, the applicant shall either: (a) remove all of the material placed or installed in connection with the emergency development authorized in this permit and restore all affected areas after consultation with California Coastal Commission staff and consistent with the Coastal Act. In some instances, a permit may be needed for removal; or (b) submit a complete follow-up Coastal Development Permit (CDP) that satisfies the requirements of section 13056 of Title 14 of the California Code of Regulations. If the Executive Director determines that the follow-up CDP application is incomplete and requests additional information, the applicant shall submit this additional information by a certain date, as established by the Executive Director. If such a follow-up CDP application is withdrawn by the applicant or is denied by the Commission, or if the follow-up CDP application remains incomplete for a period of 120 days after the Executive Director informs the applicant that the application is incomplete, the emergency permitted development and any debris or materials associated with the emergency work remaining at the site shall be removed and all affected areas restored to their prior condition, after consultation with California Coastal Commission staff and consistent with the Coastal Act, within 180 days, subject to any regulatory approvals necessary for such removal. In some instances, a permit may be needed for removal.
17. Failure to a) submit a complete follow-up CDP Application that complies with Condition No. 16 above, or b) remove the emergency development and restore all affected areas to their

January 23, 2020

Emergency Permit No.: G-1-20-0006

prior condition after consultation with California Coastal Commission staff, and consistent with the Coastal Act by the date specified in this emergency permit, or c) comply with all terms and conditions of the required follow-up CDP, including any deadlines identified therein, or d) remove the emergency permitted development and any debris or materials associated with the emergency work remaining at the site and restore all affected areas to their prior condition after consultation with California Coastal Commission staff and consistent with the Coastal Act immediately upon denial of the required follow-up CDP<sup>1</sup> will constitute a knowing and intentional violation of the Coastal Act<sup>2</sup> and may result in formal enforcement action by the Commission or the Executive Director. This formal action could include a recordation of a Notice of Violation on the applicant's property; the issuance of a Cease and Desist Order and/or a Restoration Order; imposition of administrative penalties for violations involving public access; and/or a civil lawsuit, which may result in the imposition of monetary penalties, including daily penalties of up to \$15,000 per violation per day, and other applicable penalties and other relief pursuant to Chapter 9 of the Coastal Act. Further, failure to follow all the terms and conditions of this Emergency Permit will constitute a knowing and intentional Coastal Act violation.

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<sup>1</sup> As noted above, in some instances, a permit may also be required for removal.

<sup>2</sup> The Coastal Act is codified in sections 30000 to 30900 of the California Public Resources Code. All further section references are to that code, and thus, to the Coastal Act, unless otherwise indicated.

**CALIFORNIA COASTAL COMMISSION**

NORTH COAST DISTRICT OFFICE  
 1385 EIGHTH STREET, SUITE 130  
 ARCATA, CALIFORNIA 95521-5967  
 PH (707) 826-8950 FAX (707) 826-8960  
[WWW.COASTAL.CA.GOV](http://WWW.COASTAL.CA.GOV)

**EMERGENCY PERMIT ACCEPTANCE FORM****RECEIVED**

TO: CALIFORNIA COASTAL COMMISSION  
 North Coast District Office  
 1385 Eighth Street, Suite 130  
 Arcata, California 95521-5967

JAN 31 2020

CALIFORNIA  
 COASTAL COMMISSION  
 NORTH COAST DISTRICT

RE: Emergency Permit No. G-1-20-0006

INSTRUCTIONS: After reading the attached Emergency Permit, please sign this form and return to the North Coast District Office within 15 working days from the permit's date.

I hereby understand all of the conditions of the emergency permit being issued to me and agree to abide by them.

I also understand that the emergency work is TEMPORARY and that a regular Coastal Development Permit is necessary for any permanent installation. I agree to complete the regular Coastal Development Permit application within 60 calendar days of the date of the emergency permit or I will remove the emergency work in its entirety within 60 calendar days of the date of the emergency permit (i.e., by March 24, 2020). Finally, I understand that my failure either to:

a) submit a complete follow-up Coastal Development Permit (CDP) Application that satisfies the requirements of section 13056 of Title 14 of the California Code of Regulations by the date specified in this Emergency Permit, which date may be extended by the Executive Director for good cause, or

b) Remove the emergency development and restore all affected areas to their prior condition after consultation with Coastal Commission staff as you identified consistent with the Coastal Act

will constitute a knowing and intentional violation of the Coastal Act and may result in formal enforcement action by the Commission or the Executive Director. This formal action could include a recordation of a Notice of Violation on my property; the issuance of a Cease and Desist Order and/or Restoration Order; imposition of administrative penalties for violations involving public access, and/or a civil lawsuit, which may result in the imposition of monetary penalties, including daily penalties of up to \$15,000 per violation per day, and other applicable penalties and other relief pursuant to Chapter 9 of the Coastal Act. Further, failure to follow all the terms and conditions of this Emergency Permit will constitute a knowing and intentional Coastal Act violation.

Vernon Blake Juntz Trustee  
 Signature of Property Owner or  
 Authorized Representative

Address: P.O. Box 1334  
Mendocino, CA 95460

Vernon Blake Juntz  
 Print Name

01-23-2020  
 Date of Signing

**CALIFORNIA COASTAL COMMISSION**

NORTH COAST DISTRICT OFFICE  
1385 EIGHTH STREET, SUITE 130  
ARCATA, CA 95521  
VOICE (707) 826-8950  
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[WWW.COASTAL.CA.GOV](http://WWW.COASTAL.CA.GOV)



February X, 2020

Jason Meyer, Senior Environmental Planner/Branch Chief E3  
Caltrans District 1  
North Region Environmental  
P.O. Box 3700  
Eureka, CA 95502-3700

RE: Emergency Tree Pruning and Removal, U.S. Highway 101, Post Miles 81.0 to 82.5  
(Commission Emergency Waiver File No. G-1-20-0001-W)

Dear Mr. Meyer:

On the weekend of January 18-20, 2020, the Executive Director received notification from Caltrans that beginning on Tuesday January 21<sup>st</sup> Caltrans would be undertaking an emergency project that Caltrans believes qualifies for an emergency coastal development permit (CDP) waiver under of section 30611 of the Coastal Act. The emergency work involves major vegetation removal in the Eureka-Arcata Highway 101 corridor, including the removal of approximately 38 *Eucalyptus* trees and the pruning of stems and branches of an additional approximately 189 *Eucalyptus* trees.

On January 21<sup>st</sup>, 22<sup>nd</sup>, 30<sup>th</sup>, and February 7<sup>th</sup>, Caltrans provided additional information explaining why the emergency action was required. The additional information includes assessments by certified arborists of each of the over 500 *Eucalyptus* trees along the bay-side of the highway documenting that the specific trees to be pruned or removed under the emergency project pose an imminent threat of failure and create a high risk of trees and/or branches falling within the travel portion of the roadway, potentially causing death or injury to the traveling public. Your letter of January 30<sup>th</sup> indicates that the work is being conducted as an emergency action because of the higher risk of tree failure during the high winds of winter storms currently affecting the region, and to avoid potential impacts to breeding birds that could begin occupying the trees for nesting as early as mid-February.

Section 30611 waives the requirements for obtaining a CDP in cases when immediate action by a person or public agency performing a public service is required to protect life and public property from imminent danger or in other cases of emergency and when the development does not involve permanent development valued at more than \$25,000. Section 13144 of the Commission's regulations requires notification of the Executive Director within seven days of taking action as to why the emergency action was taken and providing verification that the action complied with the expenditure limits set forth in Section 30611.

Commission staff has determined that the tree pruning and removal project as described in your letter and attachments of January 30<sup>th</sup>, as modified by your email correspondence and attachments of February 7<sup>th</sup>, complies with the requirements of section 30611 and reported this determination to the Commission at its meeting of February 14<sup>th</sup> in Long Beach. The Commission concurred with the staff's determination. Therefore, the requirement to obtain a CDP for the project as described is waived.



Jason Meyer  
Re: Emergency Waiver No. G-1-20-0001-W  
Page 2 of 2

If you have any questions, please contact Bob Merrill or me.

Sincerely,

Melissa B. Kraemer  
Supervising Analyst

Att. Information submitted by Caltrans to support the sec. 30611 emergency waiver determination

DRAFT

**DEPARTMENT OF TRANSPORTATION**  
NORTH REGION ENVIRONMENTAL  
DISTRICT 1, PO BOX 3700  
EUREKA, CA 95502-3700  
PHONE (707) 445-5222  
FAX (707) 441-5775  
TTY 711



*Making Conservation  
a California Way of Life.*

January 30, 2020

Bob Merrill, North Coast District Manager  
California Coastal Commission  
1385 8<sup>th</sup> St., Suite 130  
Arcata, CA 95521

Dear Mr. Merrill:

Caltrans is currently performing emergency tree pruning and removal along U.S. Highway 101 (US 101) between Eureka and Arcata, within Humboldt County. This work falls under Section 30611 of the Coastal Act for an emergency waiver. The trees at risk of failure have been identified on US 101 from post miles 81.0 to 82.5. Caltrans is conducting this work due to the threat of branches and trees falling within the traveled way of the roadway, potentially causing death or injury to the traveling public. To maintain public safety, 38 trees are being removed and 189 trees are being pruned. There may be a few additional trees pruned, as identified during the course of work.

These trees were assessed by a professional arborist (an independent contractor) and reviewed in the field by our internal tree crew and maintenance staff. The initial Tree Risk Assessment (October 2019) was supplemented by field discussions with the arborist and Caltrans tree crew and maintenance staff, determining whether the trees or limbs had the potential to fall within the traveled way, and documented in the spreadsheets detailing the removals and pruning. Risk ratings were based on a health and structural condition evaluation, presence of any insects or diseases, and identification of the tree part most likely to fail, and rated likelihood for failure. In the event of a tree part failure, the most likely target (people, buildings, cars), the probability of a target being present, and the consequences if a person or property were struck were identified and rated. These combined factors were used to determine the minimum and immediate tree removal or pruning necessary to prevent damage and maintain essential service and safety to the public. For instance, branches at high risk of failure, but facing away from the highway are not being removed during this emergency work but may have to be addressed later. Failing to act could result in disruption of service or damage to the highway, property damage, and injury or death to the traveling public.

Bob Merrill, California Coastal Commission  
Re: Emergency Tree Pruning and Removal  
US Highway 101, Post Miles 81.0 to 82.5  
January 30, 2020  
Page 2

We are conducting this work now as an emergency to avoid injuries to the traveling public during the high winds of winter storms. Conducting this work now avoids potential impacts to breeding birds which could begin occupying the trees in late February. As the trees are not native, we do not consider them an Environmentally Sensitive Habitat Area. We do not anticipate visual impacts because we are removing less than 10% of the stand, and the stand will remain as a visual landmark. The project will not involve fill of coastal wetlands.

If you have any questions, please contact me at [Jason.Meyer@dot.ca.gov](mailto:Jason.Meyer@dot.ca.gov) or (707) 445-5222.

Sincerely,



Jason Meyer  
Senior Environmental Planner/Branch Chief E3  
North Region Environmental

c: Brandon Larsen, North Region Environmental Office Chief  
Tom Fitzgerald, Deputy District Director of Maintenance and Operations

Attachment: Arborist Report October 2019  
Spreadsheet of tree pruning and removals.

**From:** [Meyer, Jason J@DOT](mailto:Meyer, Jason J@DOT)  
**To:** [Merrill, Bob@Coastal](mailto:Merrill, Bob@Coastal); [Kraemer, Melissa@Coastal](mailto:Kraemer, Melissa@Coastal)  
**Cc:** [Larsen, Brandon@DOT](mailto:Larsen, Brandon@DOT); [Zimmerman, Felicia@DOT](mailto:Zimmerman, Felicia@DOT); [Fitzgerald, Tom J@DOT](mailto:Fitzgerald, Tom J@DOT)  
**Subject:** Emergency Eucalyptus Tree Work  
**Date:** Friday, February 07, 2020 9:30:43 AM  
**Attachments:** [highway 101 inspection Feb 2020.pdf](#)

---

Bob,

This is the an additional written concurrence from the arborist refining some of the pruning/removal work we are conducting on the corridor. As I noted yesterday, there was one additional tree removal on the north end, where the Bay Trail will be removing all the trees.

As you can see in this letter, there were a few trees slated for removal that we were able to just prune. Unfortunately, there were also a few trees which we had hoped to only prune which in the end we needed to remove. I hope this helps demonstrate that we are taking a hard look at this, and only removing the trees and branches that are absolutely necessary to provide for the safety of the traveling public.

Let me know if you have any questions.

Thanks,

*Jason J Meyer*

North Region Environmental  
Senior Environmental Planner/Branch Chief E3  
Caltrans  
1656 Union Street  
Eureka, CA 95501  
(707) 445-5222

# Inspection Report

Project: **Eucalyptus Row**  
Address: Highway 101  
City: Eureka, CA



**Transmit to:**  
Brain Finck/Caltrans  
Arvin Lal/Caltrans

---

**INSPECTION Dates:** February 1st and 2nd, 2020  
**Inspector:** Jane Whitcomb  
**Also present:** Arvin Lal/ Caltrans  
Family Tree crew  
**General Comments:** Inspect pruning and removals for eucalyptus tree.

---

## Observations and recommendations:

I was asked to inspect the pruning to the row of eucalyptus along highway 101 between Eureka and Arcata. I visited the site on Sunday February 1st and again on Monday February 2nd. Family Tree Co. was on-site Sunday the 1st and in the process of pruning and removing the trees recommended by HortScience | Bartlett Consulting. Arvin Lal and I reviewed the recommendations and agreed to some adjustments to the original recommendations based upon the tree crew's observations and our review of the work.

They are listed as follows:

- Tree #40 - remove the 21" and 17" stems facing 101. The remaining 3 stems are upright and in my opinion show no immediate risk of failure.
- Tree #56 - Prune instead of remove
- Tree #57 - Prune instead of remove
- Tree #78 - Remove
- Tree #82 - Remove instead of prune
- Tree #95 - Remove instead of prune
- Tree #108 - Prune 22" stem
- Tree #240 - Remove
- Tree #366 - Prune 26" stem

Family Tree Co.'s pruning of branches and stems, as well as tree removal, reflected the project's focus on reducing failures over the travel lanes of Highway 101. .

If you have any questions about my observations or recommendations, please feel free to contact me.

Sincerely,

Jane Whitcomb  
Certified Arborist WE-3864  
Qualified Tree Risk Assessor

Tree Removal Summary - From Priority 1 and Priority 3 Tables							
No.	LOCATION	SPECIES	DBH	CONDITION	MLF	ABATE	Priority List
6	N.	Blue gum	21,19,13	0	Stem	Remove tree	1
9	N.	Blue gum	21	2	Whole tree	Remove tree	3
18	N.	Blue gum	28,20	1	28" stem	Remove tree	1
24	N.	Blue gum	21,16	2	Stem	Remove tree	3
30	N.	Blue gum	18	2	Whole tree	Remove tree	3
38	N.	Blue gum	24	2	Whole tree	Remove tree	3
40	N.	Blue gum	42,38,21,17,12	2	Stem	Remove tree	3
41	N.	Blue gum	21	1	Stem	Remove tree	1
49	N.	Blue gum	29	1	Whole tree	Remove tree	1
50	N.	Blue gum	20,11	2	20" stem	Remove tree	3
55	N.	Blue gum	23,21,17	2	Stem	Remove tree	1
56	N.	Blue gum	24,19	2	Stem	Remove tree	3
57	N.	Blue gum	21,13	2	Stem	Remove tree	3
58	N.	Blue gum	22	2	Stem	Remove tree	1
65	N.	Blue gum	19	0	Whole tree	Remove tree	3
69	N.	Blue gum	17	1	Whole tree	Remove tree	1
75	N.	Blue gum	18	2	Whole tree	Remove tree	1
89	N.	Blue gum	21,14	1	14" stem	Remove tree	3
113	N.	Blue gum	15	2	Whole tree	Remove tree	3
118	N.	Blue gum	21	2	Whole tree	Remove tree	3
186	S.	Blue gum	21	2	Whole tree	Remove tree	1
203	S	Blue gum	19	2	Whole tree	Remove tree	3
265	S.	Blue gum	23	1	Whole tree	Remove tree	1
271	S	Blue gum	19	2	Stem	Remove tree	3
283	S.	Blue gum	16	2	Stem	Remove tree	1
293	S.	Blue gum	18	2	Stem	Remove tree	1
325	S	Blue gum	19	2	Whole tree	Remove tree	3
329	S.	Blue gum	19	2	Stem	Remove tree	1
334	S.	Blue gum	38	2	Whole tree	Remove tree	1
337	S	Blue gum	24	2	Stem	Remove tree	3
366	S.	Blue gum	26,18	2	Stem	Remove tree	1
386	S.	Blue gum	24	2	Heavy lateral branch	Remove tree	1
390	S.	Blue gum	35	2	Whole tree	Remove tree	1
414	S	Blue gum	31	2	Stem	Remove tree	3
438	S.	Blue gum	18	2	Whole tree	Remove tree	1
440	S.	Blue gum	22	2	Whole tree	Remove tree	1
455	S	Blue gum	28	2	Whole tree	Remove tree	3
495	S.	Blue gum	35	2	Whole tree	Remove tree	1
<b>38</b>	Total trees to be removed.						

Tree Pruning Summary - Moderate List & Tree Risk Rating					Comments	MLF	Abatement Notes
No.	Location	Species	DBH	No. stems Condition			
1	N	Blue Gum	36, 35, 18	3	Branch		
2	N	Blue Gum	35, 28	2	Branch		
3	N	Blue Gum	23, 17	2	Stem	Remove	
11	N	Blue Gum	40, 22	2	Branch		
12	N	Blue Gum	40, 22	2	Branch		
21	N	Blue Gum	31	1	Branch		
23	N	Blue Gum	16	2	Intermediate, small high crown.		Remove
24	N	Blue Gum	21, 16	2	Codominant trunks @ base, decayed stub @ base on NW, 21' stem vertical with small high crown; 16' leans SW, with long decay cavity.		Prune
27	N	Blue Gum	37, 26, 22	3	Multiple attachments @ 3' codominant trunks @ 6' 26' stem all but dead with decay cavity on tension side near attachment; other stems sweep over.		Branch
31	N	Blue Gum	33	1	Multiple attachments high in crown, one-sided to E.		Prune
32	N	Blue Gum	30, 29, 27, 26	4	Multiple attachments @ base, 9-14' stems vertical, high crown.		Prune
40	N	Blue Gum	42, 38, 21, 17, 12	5	Multiple attachments @ base, 2 stems vertical, 2 sweep upright, 2 lean SW.		Stem
42	N	Blue Gum	40, 30, 15	3	Branch		Prune
43	N	Blue Gum	28, 22	2	Codominant trunks @ 1' 28' stem vertical, 22' sweeps vertical on W.		Prune
44	N	Blue Gum	23, 21, 16	3	Multiple attachments @ base, 30' stem leans NW, 23' decay @ base, 16' slender with small high crown.		Prune
45	N	Blue Gum	30, 23, 17	3	Multiple attachments @ base, 30' stem leans NW, 23' decay @ base, 16' slender with small high crown.		Prune
46	N	Blue Gum	25	1	Stem		Prune
48	N	Blue Gum	23, 19	2	Codominant trunks @ base, 23' stem vertical, codominant again high in crown, 19' sweeps to W, with decay in attachment.		Branch
51	N	Blue Gum	47, 22, 15	3	Codominant trunks @ base, 22' stem leans SW, 28' multiple attachments high in crown.		Branch
52	N	Blue Gum	45	2	Branch		Prune
53	N	Blue Gum	23, 19, 15	3	Codominant trunks @ base & 3'; one-sided to W.		Prune
56	N	Blue Gum	24, 19	2	Codominant trunks @ 1.8 & 12'; upper crown of 24' stem bowed E.		Prune
57	N	Blue Gum	21, 13	2	Codominant trunks @ base, 21' stem slight lean SE, 13' decay @ base.		Stem
59	N	Blue Gum	24, 22, 19, 14	4	Multiple attachments @ 2' trunks sinuous but mostly upright, long decay throughout.		Branch
62	N	Blue Gum	29	1	Stems x'd @ base, slight bow NE, high crown.		Prune
68	N	Blue Gum	24	1	Branch		Prune
72	N	Blue Gum	32, 24, 22	3	Multiple attachments @ base, 3, 4' stem dominates, others poor & on W, one-sided to W.		Prune
76	N	Blue Gum	34, 16	2	Patchy corrected lean N, codominant trunks high in crown.		Branch
77	N	Blue Gum	20	1	Stem		Remove
80	N	Blue Gum	37	1	Codominant trunks @ 7 & 10', high crown.		Branch
82	N	Blue Gum	31	2	Leans E, upper crown bowed N.		Branch
88	N	Blue Gum	30, 25, 22	3	Multiple attachments @ base, 30' & 22' stems vertical, 25' crook @ 5' with decay.		Branch
91	N	Blue Gum	24, 16	2	Codominant trunks @ base, 24' stem broad sweep vertical, codominant trunks high in crown.		25' stem
92	N	Blue Gum	31, 23	2	Codominant trunks @ 2' vertical, lots of scaffold limbs.		Branch
93	N	Blue Gum	35	1	Partly corrected lean S, basal stems x'd; codominant trunks @ 14'.		Prune
96	N	Blue Gum	35, 32, 24, 20, 20	5	Stems vertical, upper crown bowed N, with high crown.		Prune
100	N	Blue Gum	34, 21	2	Codominant trunks @ base, 4' & 17' vertical on E, bow on NW.		Branch
103	N	Blue Gum	28, 25, 23, 21	4	Codominant trunks @ 2 & 7', corrected lean E, high crown.		Prune
104	N	Blue Gum	26, 24, 19, 19, 10	5	Multiple attachments @ base, codominant trunk @ 4', sweep upright, high crown.		Branch
105	N	Blue Gum	27, 24, 19, 16	4	Multiple attachments @ base & 2', vertical, thin canopy, dead stem & stubs.		Branch
106	N	Blue Gum	30, 20	2	Multiple attachments @ base, poor attachment, add 1' stem x'd on N, 27' stem vertical, other sweep upright.		Branch
108	N	Blue Gum	22, 19	2	Codominant trunks @ base, 30' stem vertical, high crown; 20' leans W, to railroad tracks.		Branch
109	N	Blue Gum	29, 23, 15, 12	4	Codominant trunks @ base, stem x'd @ base, 22' stem partly corrected lean E, upper crown bowed N, 18' largely dead.		Remove
110	N	Blue Gum	25	1	Codominant trunks @ base, multiple attachments @ 3' 28' stem sweeps upright with high crown; rest of tree a mess.		Branch
115	N	Blue Gum	42	1	High crown, slight bow E.		Prune
119	N	Blue Gum	26	1	Codominant trunks @ 7 & above, high crown.		Prune
125	N	Blue Gum	46, 24	2	Codominant trunks @ base, 46' stem vertical & rangy, scaffold on E, with 2 crooks; 24' broad sweep upright.		Prune
126	N	Blue Gum	33, 26	2	Codominant trunks @ 1' 33' stem sweeps upright but lost central leader, 26' with long decay, column on N.		Prune
137	S	Blue Gum	40	1	High crown, one-sided to E.		Branch
141	S	Blue Gum	37	1	Prune form to E/W.		Remove
142	S	Blue Gum	35	1	Branch		Remove
144	S	Blue Gum	29	1	Prune form to E/W.		Remove
145	S	Blue Gum	29, 17	2	Codominant trunks @ 3'; slight separation.		Branch
158	S	Blue Gum	29	1	Prune form to E/W.		Remove
160	S	Blue Gum	34	1	Crook mid-crown, one-sided to E.		Prune
166	S	Blue Gum	29	1	Codominant trunks high in crown; high crown.		Prune
168	S	Blue Gum	24, 22	2	Codominant trunks @ 3'; less to 10', vertical & twisted, overall, poor structure.		Prune
180	S	Blue Gum	29	1	Codominant trunks high in crown.		Prune
183	S	Blue Gum	33, 31	2	Codominant trunks @ 3'; vertical.		Prune
188	S	Blue Gum	27, 23	2	Codominant trunks @ 1' 27' stem with high crown; 23' leans W, & is poor.		Prune
189	S	Blue Gum	28, 15	2	Codominant trunks @ 28' stem crown dead, upper high in crown.		Branch
191	S	Blue Gum	40	1	Slight lean NE, multiple attachments high in crown where topped.		Prune
193	S	Blue Gum	28	1	Codominant trunks high in crown.		Prune
196	S	Blue Gum	31	1	Codominant trunks mid-crown, separated.		Prune
199	S	Blue Gum	32, 17, 14	3	Multiple attachments @ base, 3, 2' stem corrected lean E, other 2 lean W.		Branch
201	S	Blue Gum	26, 22	2	Codominant trunks @ base, 26' stem sinuous & dominant; 22' leans SW.		Branch
202	S	Blue Gum	36, 26, 24	3	Codominant trunks @ 2 & 5'; vertical.		Branch
206	S	Blue Gum	31	1	Sinuous trunk, one-sided to E.		Prune
213	S	Blue Gum	26	1	Crook mid-crown.		Prune
216	S	Blue Gum	25	1	Stems vertical, codominant trunks high in crown.		Prune
217	S	Blue Gum	27	1	Codominant trunks @ 2' narrow & rangy.		Branch
218	S	Blue Gum	27	1	Codominant trunks @ 2' 27' stem vertical, 18' slight lean W, with long trunk cavity.		Prune
219	S	Blue Gum	23	1	One-sided to E.		Branch
221	S	Blue Gum	21	1	Narrow form.		Prune
222	S	Blue Gum	28	1	Sinuous trunk, crook mid-crown.		Branch
224	S	Blue Gum	33, 27, 17, 14	4	Multiple attachments @ 4'; codominant trunks above, vertical, thin canopy.		Branch
225	S	Blue Gum	26, 14	2	Codominant trunks @ 4' 28' stem dominates; corrected lean N.		Prune
226	S	Blue Gum	30	1	Very narrow form.		Branch
230	S	Blue Gum	30, 8	2	Codominant trunks @ 1'; vertical, high crown.		Branch
236	S	Blue Gum	27	1	Codominant trunks @ 7'; narrow & rangy.		Branch
241	S	Blue Gum	27, 18	2	Codominant trunks @ 2' 27' stem vertical, 18' slight lean W, with long trunk cavity.		Branch
243	S	Blue Gum	29	1	Narrow form.		Prune
248	S	Blue Gum	23	1	Branch		Prune
251	S	Blue Gum	31	1	Codominant trunks @ base & 6'; vertical.		Branch
252	S	Blue Gum	29, 22	2	Codominant trunks @ base & 6'; vertical.		Prune
255	S	Blue Gum	34	1	Branch		Prune
256	S	Blue Gum	34, 18	2	Codominant trunks @ base & 6'; vertical.		Prune
263	S	Blue Gum	34, 33	2	Codominant trunks high in crown, one-sided to E.		Branch
266	S	Blue Gum	26, 23	2	Codominant trunks @ 1' 26' stem vertical but lost central leader high in crown; 23' skeletal with little live foliage.		Prune
268	S	Blue Gum	32	1	High crown.		Branch
269	S	Blue Gum	30	1	High narrow crown.		Branch
272	S	Blue Gum	27, 17, 17	3	Multiple attachments @ base, 27' stem vertical but very thin; other stems poor.		Branch
274	S	Blue Gum	24, 18	2	Codominant trunks @ 1' 24' stem vertical & rangy, 18' leans W.		Branch
275	S	Blue Gum	27	1	Sinuous trunk, otherwise okay.		Prune

277	S	Blue gum	49	1	4	Codominant trunks @ 5'; vertical, nice canopy.	Branch	Prune	Reduce and/or remove branches facing the highway.
280	S	Blue gum	23,20	2	2	Codominant trunks @ 4'; vertical, small thin canopy.	Branch	Prune	Reduce and/or remove branches facing the highway.
281	S	Blue gum	30,18	2	2	Codominant trunks @ 1'; 30' stem one-sided & leans E.; 19' with long trunk cavity.	Branch	Prune	Reduce height of 30' stem, remove 18' stem
282	S	Blue gum	41	1	3	Multiple attachments mid-crown where topped.	Branch	Prune	Topped. Check attachment & orientation of resulting branch(es). Reduce, re-top or remove tree.
283	S	Blue gum	10,17	2	3	Codominant trunks @ 30' stem narrow crown.	Branch	Prune	Reduce and/or remove branches facing the highway.
287	S	Blue gum	30,22	2	3	Codominant trunks @ base, 30' stem narrow crown, 22' broad sweep to W.; decay near attachment.	Branch	Prune	Reduce and/or remove branches facing the highway.
290	S	Blue gum	28	1	2	Codominant trunks @ 7, 1 stem vertical, 2nd leans W.	Branch	Prune	Reduce and/or remove branches facing the highway.
292	S	Blue gum	30	2	3	Upper crown slight bow N.	Branch	Prune	Reduce and/or remove branches facing the highway.
295	S	Blue gum	30,26,17	3	3	Codominant trunks @ base & 1'; 2' larger stems vertical, 17' leans W. with trunk cavity.	Branch	Prune	Reduce and/or remove branches facing the highway.
298	S	Blue gum	31,26,12	3	3	Multiple attachments @ base; vertical, high crown, topped.	Branch	Prune	Topped. Check attachment & orientation of resulting branch(es). Reduce, re-top or remove tree.
300	S	Blue gum	26	1	3	High crown.	Branch	Prune	Reduce and/or remove branches facing the highway.
304	S	Blue gum	26,19	2	3	Codominant trunks @ base, 28' stem sweeps uplight.	Branch	Prune	Reduce and/or remove branches facing the highway.
305	S	Blue gum	21,13	1	3	Codominant trunks @ base & 5, 21' stem dominates.	Branch	Prune	Reduce and/or remove branches facing the highway.
308	S	Blue gum	30, 17	1	3	Multiple attachments @ 6'; unusual form; 2 stems vertical on E.; 3rd wide sweep on W.	Branch	Prune	Reduce and/or remove branches facing the highway.
314	S	Blue gum	43	1	3	One-sided to E.; crook mid-crown.	Branch	Prune	Topped. Check attachment & orientation of resulting branch(es). Reduce, re-top or remove tree.
318	S	Blue gum	23	1	3	Codominant trunks @ 4' with stem to ground on W.; slight lean SE.; crook mid-crown.	Branch	Prune	Topped. Check attachment & orientation of resulting branch(es). Reduce, re-top or remove tree.
319	S	Blue gum	21,19	2	3	Very small crown.	Branch	Prune	Topped. Check attachment & orientation of resulting branch(es). Reduce, re-top or remove tree.
322	S	Blue gum	49	1	3	Codominant trunks mid-crown where topped.	Branch	Prune	Topped. Check attachment & orientation of resulting branch(es). Reduce, re-top or remove tree.
323	S	Blue gum	36	1	3	Crook mid-crown with decayed stub, high crown.	Branch	Prune	Topped. Check attachment & orientation of resulting branch(es). Reduce, re-top or remove tree.
329	S	Blue gum	30	1	2	Intermediate; flat form to E/W.; crook mid-crown.	Branch	Prune	Reduce and/or remove branches facing the highway.
343	S	Blue gum	20	1	2	Small high crown.	Branch	Prune	Reduce and/or remove branches facing the highway.
344	S	Blue gum	23	1	3	Lean, central leader @ top of tree; crook mid-crown.	Branch	Prune	Reduce and/or remove branches facing the highway.
347	S	Blue gum	29	1	3	Leat, central leader @ top of tree; crook mid-crown.	Branch	Prune	Reduce and/or remove branches facing the highway.
351	S	Blue gum	23	1	3	Leat, central leader @ top of tree; crook mid-crown.	Branch	Prune	Reduce and/or remove branches facing the highway.
353	S	Blue gum	23	1	3	Topped high in crown; one branch results.	Branch	Prune	Topped. Check attachment & orientation of resulting branch(es). Reduce, re-top or remove tree.
358	S	Blue gum	32	1	3	Crook mid-crown where topped; big crown.	Branch	Prune	Topped. Check attachment & orientation of resulting branch(es). Reduce, re-top or remove tree.
360	S	Blue gum	22	1	3	Codominant trunks mid-crown; high crown.	Branch	Prune	Reduce and/or remove branches facing the highway.
361	S	Blue gum	22	1	3	Codominant trunks mid-crown; high crown.	Branch	Prune	Reduce and/or remove branches facing the highway.
367	S	Blue gum	24	1	3	Codominant stems @ base; codominant trunks high in crown, one-sided to E.	Branch	Prune	Reduce and/or remove branches facing the highway.
369	S	Blue gum	32	1	3	Multiple attachments mid-crown.	Branch	Prune	Reduce and/or remove branches facing the highway.
370	S	Blue gum	31	1	3	High narrow crown.	Branch	Prune	Reduce and/or remove branches facing the highway.
373	S	Blue gum	22	1	3	Codominant trunks mid-crown, one-sided to E.	Branch	Prune	Reduce and/or remove branches facing the highway.
375	S	Blue gum	36,28	2	3	Codominant trunks @ base, 36' stem dominates; 28' codominant again @ 8'; 1 stem leans SE.	Branch	Prune	Remove stem that leans SE.
377	S	Blue gum	41	1	3	Big tree with large crown; flat form to E/W.; 1st central leader @ top.	Branch	Prune	Reduce and/or remove branches facing the highway.
378	S	Blue gum	33	1	3	Big tree with large crown; crook & codominant trunks mid-crown.	Branch	Prune	Reduce and/or remove branches facing the highway.
380	S	Blue gum	41	1	3	Suppressed.	Branch	Prune	Reduce and/or remove branches facing the highway.
382	S	Blue gum	40, 29	2	3	Suppressed.	Branch	Prune	Reduce and/or remove branches facing the highway.
388	S	Blue gum	40	1	3	Codominant trunks high in crown; 2 stems vertical.	Branch	Prune	Reduce and/or remove branches facing the highway.
399	S	Blue gum	35	1	3	Codominant trunks @ 1'; 31' stem dominates; codominant again high in crown where topped; 21' smaller.	Branch	Prune	Reduce and/or remove branches facing the highway.
397	S	Blue gum	39	1	3	Large well-butressed trunk wound on N.; small high crown.	Branch	Prune	Reduce and/or remove branches facing the highway.
398	S	Blue gum	29	1	3	Corrected lean E.; codominant trunks high in crown. Whole tree failure nearby.	Branch	Prune	Reduce and/or remove branches facing the highway.
401	S	Blue gum	33	1	3	Corrected lean E.; small crown.	Branch	Prune	Reduce and/or remove branches facing the highway.
404	S	Blue gum	37,26,26	3	3	Multiple attachments @ 2'; vertical, one-sided to S.	Branch	Prune	Reduce and/or remove branches facing the highway.
406	S	Blue gum	47, 21	2	3	Codominant trunks @ base; corrected lean N.; 47' stem codominant trunks high in crown.	Branch	Prune	Reduce and/or remove branches facing the highway.
409	S	Blue gum	41	1	3	Corrected lean SE.	Branch	Prune	Reduce and/or remove branches facing the highway.
410	S	Blue gum	38	1	3	Corrected lean SE.	Branch	Prune	Reduce and/or remove branches facing the highway.
413	S	Blue gum	24,20	2	3	Codominant trunks @ base; both with high crown.	Branch	Prune	Reduce and/or remove branches facing the highway.
416	S	Blue gum	23	1	2	Large well-butressed trunk wound on N.; small high crown.	Branch	Prune	Reduce and/or remove branches facing the highway.
418	S	Blue gum	24	1	3	Multiple attachments mid-crown where topped.	Branch	Prune	Reduce and/or remove branches facing the highway.
420	S	Blue gum	29	1	3	Codominant trunks @ 1'; 31' stem dominates; codominant again high in crown where topped; 21' smaller.	Branch	Prune	Reduce and/or remove branches facing the highway.
424	S	Blue gum	31,21	2	3	Codominant trunks @ 3, 31' stem codominant again high in crown where topped; 28' multiple attachments where topped.	Branch	Prune	Reduce and/or remove branches facing the highway.
425	S	Blue gum	31,29	2	3	Codominant trunks @ 3, 31' stem codominant again high in crown where topped; 28' multiple attachments where topped.	Branch	Prune	Reduce and/or remove branches facing the highway.
428	S	Blue gum	30,28,20	3	3	Multiple attachments @ 2, 2' large trunks west around one another, 3rd stem east, decay to W.	Branch	Prune	Reduce and/or remove branches facing the highway.
433	S	Blue gum	30,28,20	3	3	Multiple attachments @ 2, 2' large trunks west around one another, 3rd stem east, decay to W.	Branch	Prune	Reduce and/or remove branches facing the highway.
436	S	Blue gum	42	1	3	Codominant trunks high in crown; 2 stems vertical.	Branch	Prune	Reduce and/or remove branches facing the highway.
441	S	Blue gum	25,20	2	2	Codominant trunks @ 2'; vertical but with small crowns.	Branch	Prune	Reduce and/or remove branches facing the highway.
443	S	Blue gum	26	1	3	Multiple attachments high in crown where topped; corrected lean E.	Branch	Prune	Reduce and/or remove branches facing the highway.
444	S	Blue gum	36,30	2	3	Multiple attachments @ 4'; sweep to vertical, high crown.	Branch	Prune	Reduce and/or remove branches facing the highway.
445	S	Blue gum	30	1	3	One-sided to E.	Branch	Prune	Reduce and/or remove branches facing the highway.
449	S	Blue gum	33	1	3	Corrected lean & one-sided to E.; codominant high in crown where topped.	Branch	Prune	Reduce and/or remove branches facing the highway.
452	S	Blue gum	21	1	3	Corrected lean & one-sided to E.; codominant high in crown where topped.	Branch	Prune	Reduce and/or remove branches facing the highway.
453	S	Blue gum	21	1	3	Corrected lean & one-sided to E.; codominant high in crown where topped.	Branch	Prune	Reduce and/or remove branches facing the highway.
457	S	Blue gum	35	1	3	Crook mid-crown where topped; one-sided to E.	Branch	Prune	Reduce and/or remove branches facing the highway.
457	S	Blue gum	61	1	3	Codominant trunks @ 1 & 7'; kts above attachments; vertical, high crown.	Branch	Prune	Reduce and/or remove branches facing the highway.
460	S	Blue gum	49,23	2	3	Codominant trunks @ 2'; 49' stem with multiple attachments high in crown where topped.	Branch	Prune	Reduce and/or remove branches facing the highway.
462	S	Blue gum	26	1	2	Codominant trunks high in crown where topped.	Branch	Prune	Reduce and/or remove branches facing the highway.
465	S	Blue gum	26	1	3	Slight lean N.; codominant trunks mid-crown.	Branch	Prune	Reduce and/or remove branches facing the highway.
467	S	Blue gum	30	1	3	Codominant trunks high in crown where topped.	Branch	Prune	Reduce and/or remove branches facing the highway.
470	S	Blue gum	31	1	3	Slight lean & one-side to E.; stem x'd @ base.	Branch	Prune	Reduce and/or remove branches facing the highway.
472	S	Blue gum	15,18	2	3	Codominant trunks @ base & 15'; stem x'd @ base.	Branch	Prune	Reduce and/or remove branches facing the highway.
473	S	Blue gum	40,26,18	3	3	Codominant trunks @ base & 4'; 40' & 26' stems vertical, 18' strong lean W.	Branch	Prune	Reduce and/or remove branches facing the highway.
463	S	Blue gum	60	1	3	Codominant trunks @ base & 4'; 40' & 26' stems vertical, 18' strong lean W.	Branch	Prune	Reduce and/or remove branches facing the highway.
474	S	Blue gum	35	1	3	Flat form to E/W.	Branch	Prune	Reduce and/or remove branches facing the highway.
475	S	Blue gum	32	1	2	Corrected lean & one-sided to S.	Branch	Prune	Reduce and/or remove branches facing the highway.
477	S	Blue gum	33	1	3	Slight lean E.; high crown; 1st central leader @ top.	Branch	Prune	Reduce and/or remove branches facing the highway.
480	S	Blue gum	34	1	3	High crown; one-sided to E.	Branch	Prune	Reduce and/or remove branches facing the highway.
482	S	Blue gum	29,28,22	3	3	Multiple attachments @ base; poor attachment, 22' stem topped, others vertical.	Branch	Prune	Reduce and/or remove branches facing the highway.
487	S	Blue gum	30,20	2	3	Codominant trunks @ 4 & 6'; 35' stem okay.	Branch	Prune	Reduce and/or remove branches facing the highway.
487	S	Blue gum	30,20	2	3	Codominant trunks @ 4 & 6'; 35' stem okay.	Branch	Prune	Reduce and/or remove branches facing the highway.
489	S	Blue gum	33	1	2	Codominant trunks mid-crown where topped; upper crown bowed E.	Branch	Prune	Reduce and/or remove branches facing the highway.
494	S	Blue gum	45, 45, 41	3	2	Codominant trunks @ 2'; vertical.	Branch	Prune	Reduce and/or remove branches facing the highway.
497	S	Blue gum	42,29	2	3	Multiple attachments @ 2'; 31' & 25' stems vertical, 19' broad sweep.	Branch	Prune	Reduce and/or remove branches facing the highway.
498	S	Blue gum	31,25,19	3	3	Multiple attachments @ 2'; 31' & 25' stems vertical, 19' broad sweep.	Branch	Prune	Reduce and/or remove branches facing the highway.
499	S	Blue gum	46	1	3	Codominant trunks @ base; 21' stem dominates; codominant again high in crown.	Branch	Prune	Reduce and/or remove branches facing the highway.
501	S	Blue gum	25,15	2	3	Codominant trunks @ base; 25' stem dominates; codominant again high in crown.	Branch	Prune	Reduce and/or remove branches facing the highway.
502	S	Blue gum	32	1	2	Codominant trunks @ 6'; 31' stem dominates but with small crown.	Branch	Prune	Reduce and/or remove branches facing the highway.
504	S	Blue gum	32	1	2	Codominant trunks @ 6'; 31' stem dominates but with small crown.	Branch	Prune	Reduce and/or remove branches facing the highway.
505	S	Blue gum	52,37,28,20,20	5	3	Edge of bank, multiple attachments @ 2' & above, 2 stems dominate.	Branch	Prune	Reduce and/or remove branches facing the highway.
506	E	Blue gum	44	1	3	Edge of bank, multiple attachments @ 2' & above, 2 stems dominate.	Branch	Prune	Reduce and/or remove branches facing the highway.
507	E	Blue gum	45	1	3	Low, lateral branches sweep vertical throughout, several starting to bow out @ tips.	Branch	Prune	Reduce and/or remove branches facing the highway.
508	E	Blue gum	63	1	4	Codominant trunks @ 10'; 1 stem vertical & dominant; 2nd stem best central leader on N.	Branch	Prune	Reduce and/or remove branches facing the highway.
509	E	Blue gum	62	1	4	One-sided to S.	Branch	Prune	Reduce and/or remove branches facing the highway.
511	E	Blue gum	45	1	3	High crown; flat form to E/W.	Branch	Prune	Reduce and/or remove branches facing the highway.



512	E	Blue gum	60	1	4	One-sided to N.	Branch	Prune	Reduce and/or remove branches facing the highway.
189	Total trees to be pruned.								