

CALIFORNIA COASTAL COMMISSION

NORTH COAST DISTRICT OFFICE

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BORDER COAST REGIONAL
AIRPORT AUTHORITY

August 1, 2013

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AIRPORT AUTHORITY

Robin Hunt, Manager
Federal Aviation Administration
San Francisco Airports District Office
1000 Marina Blvd., Suite 220
Brisbane, CA 94005-1835

SUBJECT: California Coastal Commission Review of Coastal Development Permit No 1-13-009 (Border Coast Regional Airport Authority McNamara Field Runway Safety Area Project).

Dear Ms. Hunt:

I am writing to inform you of the status of the Coastal Commission's review of the coastal development permit application submitted by the Border Coast Regional Airport Authority (BCRAA) for the McNamara Field Runway Safety Area Project near Crescent City. We are aware that the FAA is considering requests by the BCRAA for grant funding of the project, and we understand that evidence of Coastal Commission approval of the project may be an important consideration in the FAA's review of the BCRAA's grant application.

The Commission staff has been working closely with the BCRAA staff and consulting team in our review of the project for several years. We have conducted half a dozen site visits, participated in monthly interagency meetings, met many more times with the staff and consultants of the BCRAA, and reviewed and commented on many of the environmental studies and investigations performed for the project. The frequency of these meetings and consultations has intensified over the last nine months and we have been working collaboratively with the BCRAA representatives to resolve the Coastal Act issues raised by the project. The project will have substantial adverse impacts on coastal resources including the filling or grading of approximately 17 acres of wetland fill, four acres of coastal dune/prairie, and the habitat of three rare plant species. All of these resources are considered environmentally sensitive habitat under the Coastal Act. To approve the project, the Commission must find, among other things, that the proposed filling and grading of those resources involves the least environmentally damaging feasible alternative and that appropriate mitigation will be provided. The Commission often requires that mitigation be provided at a ratio of 4 acres of mitigation for every acre (4:1) of habitat impact from projects, and given the unusually large acreage of habitat impact associated with the project, development of a suitable mitigation proposal has been an enormous challenge for the BCRAA. Unlike in some areas of the country, there are no mitigation banks available for the BCRAA to utilize to meet its mitigation obligation. BCRAA has had to develop its proposal on the basis of investigation of specific potential mitigation sites and actions which often has necessitated very detailed study. As you are aware, this challenge has been made even more

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difficult with the filing of litigation by property owners in the area against the BCRAA and the FAA relating to the proposed mitigation for the project. This recent litigation has caused the BCRAA to expand its investigation of mitigation options which has also resulted in increased consultations and review by our staff in our efforts to help the BCRAA develop an appropriate mitigation proposal for the project.

The BCRAA staff had indicated a number of months ago that it would be important to obtain necessary permit approvals for the project, including the coastal development permit from the Commission, by August, if possible, to meet deadlines associated with the FAA grant process. Although the BCRAA team and our staff worked tirelessly in the development and review of mitigation proposals, the complex BCRAA mitigation proposal was not sufficiently completed in time for the project to be placed on the Commission's August Commission meeting agenda. However, we have continued to work very closely with the BCRAA team and sufficient progress has been made that we have determined that the project can be scheduled for the Commission's next meeting during September 11-13 in Eureka.

We have indicated to the BCRAA staff that the Commission staff will be recommending that the Commission grant approval of the project with conditions that would require, among other requirements, implementation of the mitigation proposal. The written staff recommendation and public hearing notice will be issued by the end of August. The Commission normally completes the public hearing and takes action on a coastal development permit application during one Commission meeting, especially when the hearing is held in the local area, as the September hearing will be for the BCRAA project. Assuming the Commission approves the project as we anticipate, staff will issue the necessary Notice of Intent to Issue a Coastal Development Permit or other record of approval of the project within the next couple of business days after Commission action.

Thank you for your consideration of our comments. We appreciate that the FAA's review of the BCRAA's grant application involves its own challenges and complexities. We would be happy to discuss the project and the Commission's review of the project with you or your staff if there is any way we can facilitate your review of the grant application. Please don't hesitate to call me at (707)826-8950 ext. 8.

Sincerely,



ROBERT S. MERRILL
North Coast District Manager

cc:

~~For B. Merrill BCRAA~~