

Chapter 4 Information Needed for Project Delivery

The sections below describe initial considerations and technical information potentially needed for successful project delivery in the coastal zone.

4.1 Regional Transportation Plan

The Department encourages Metropolitan Planning Organizations and Regional Transportation Planning Associations to include the following information, as appropriate, in the environmental document for the Regional Transportation Plan (RTP):

- Transportation Concept Reports (TCR) should be reviewed to determine how the project fits within the vision of the corridor and to identify other corridor needs.
- Coastal zone designation, if applicable, within study area or corridor.
- Any known potential impacts to, and mitigation measures for, public access and environmental resources within the coastal zone.
- Provisions for the California Coastal Trail, as required by CA Government Code Section 65080.1.

4.2 Project Initiation Document

Include the following information in the Preliminary Environmental Analysis Report (PEAR) prepared as part of the Project Initiation Document (PID):

- Coastal zone designation, if applicable, within study area or corridor.
- Relevant state, regional, and local planning documents such as the California Transportation Plan (CTP), RTP, TCR, Public Works Plan (PWP), or Local Coastal Program (LCP).
- Any known or potential impacts to and avoidance, minimization, and/or mitigation measures for environmental resources, including all modes of public access, within the coastal zone.
- Preliminary determination of whether a coastal development permit or other necessary approval from the state's coastal program will be needed and, if so, from which agency.
- Preliminary identification of key Coastal Act and LCP policies applicable to the project area.

For projects off the State Highway System, complete the [Preliminary Environmental Study \(PES\)](#) form.

Also verify all information from the RTP stage.

4.3 Reporting

4.3.1 Determining the Need for a Separate Technical Report

Preparation of a separate technical report for coastal resources is not required, but detailed technical data that may not otherwise be required for California Environmental Quality Act (CEQA) or National Environmental Policy Act (NEPA) reviews is often requested to support coastal policy consistency findings. The need and requirements for such data should be identified during development of the draft environmental document (see the [Caltrans Coastal Resource Policy Checklist](#)). For a proposed project located in the coastal zone, the necessary information may be incorporated by revising or adding to existing studies already under development.

4.3.1.1 Technical Information

As part of the permitting process, the following technical information is often used to support the permit application and may be instrumental in making coastal policy consistency findings for approval of a project:

- **Jurisdictional wetland delineations** meeting Coastal Act definitions and conducted consistent with California Coastal Commission (CCC) guidelines. These should include a current (typically less than 2 years old) detailed impact analysis of temporary and permanent project features. Wetland delineations are commonly required for any project located within 100 feet of a potential wetland resource, including isolated wetlands ([Public Resources Code \(PRC\) Section 30233](#); [California Code of Regulations \(CCR\) Title 14 Section 13577\(b\)](#)). Note that in many instances, wetland delineation criteria identified in CCR Title 14 Section 13577(b) will differ from criteria utilized by other resource agencies (e.g., U.S. Army Corps of Engineers) for identifying wetlands.
- **The Natural Environment Study (NES)**, with a discussion of existing physical and biological conditions, including natural communities of special concern and special-status plant and animal species as identified in the Coastal Act and LCP policies. A discussion of study methods, survey area, results, limitations that may influence results, project impacts, and avoidance, minimization, and/or mitigation efforts should be provided for each resource. In addition to information normally considered in the NES, during field work the project biologist should also gather information pertaining to coastal wetlands and environmentally sensitive habitat areas (ESHA) as defined by the Coastal Act in Section 30240. The additional data typically involves the following: mapped sensitive habitat areas, potential special-status species occurrence (including focused special-status species protocol

surveys/evaluations, as necessary), and detailed temporary and permanent project impact analysis. Biological analysis is typically required for any project located in a resource protection area, as identified in a certified LCP, or for a project located within 100 feet of a potential ESHA and/or where special-status species potentially occur (PRC Sections 30233 and 30240).

- **Agricultural resources impact evaluation** identifying potential project impacts to agricultural resources. An agricultural resources impact evaluation is typically required for any project located within a site designated and zoned for agricultural use and actively used for agricultural purposes, containing designated prime farmland and/or active agricultural uses, containing any other prime agricultural land identified by the Coastal Act. Note that PRC Section 30113 and referencing [Section 51201 of the CA Government Code](#) generally define these as:
 - Lands consisting of Class I or II soils as defined by the Natural Resources Conservation Service.
 - Soils with a Storie Index Rating of 80 through 100.
 - Lands with the ability to support livestock (at least one animal unit per acre as defined by the United States Department of Agriculture).
 - Lands planted with fruit- or nut-bearing trees, vines, bushes, or crops.
 - An agricultural viability analysis may also need to be provided, including, but not limited to consideration of an economic feasibility evaluation containing at least both of the following elements: 1) analysis of the gross revenue from the agricultural products grown in the area for five years, and 2) analysis of the operational expenses, excluding the cost of land, associated with the production of agricultural products grown in the area for five years.
 - Additionally, a current map and description of known agricultural lands (as defined by the Coastal Act and LCPs) and proposed development location may also need to be provided.
- **Water quality reports** describing how the project is designed to minimize grading, erosion and runoff, and to incorporate project Best Management Practices that will avoid or minimize hydrological alterations and minimize sedimentation and pollutant loads in stormwater runoff. The large majority of new construction projects will require preparation of a water quality report. The exception may be for projects that are minor in nature and qualify for a coastal development permit waiver (or equivalent staff-level review procedure) (PRC Sections 30230 and 30231).
- **Public access and recreation-related studies**, including traffic and parking demand studies, inventories, and maps of existing and planned public access and recreation areas. Give careful attention to non-motorized modes of transportation and maximizing public access to the shoreline. Public access- and recreation-related studies are typically required for any

project located along or near the shoreline or coastal recreation area (including beaches, parks, trails, and inland waterbodies). Studies are also required for projects that have the potential to temporarily or permanently affect access and recreation opportunities because they physically displace land or parking resources used for such uses, public pullouts, or viewing areas; or change traffic patterns along critical access corridors. Discuss the status of the Coastal Trail in the vicinity and factor it into the project planning process. Note any provisions in the applicable RTP and TCRs; any local bike, pedestrian plans, and parking facilities; and any other considerations for interconnecting trail systems and for providing appropriate, safe roadway crossings. The study may also need to address whether the impact is to “low-cost visitor and recreational facilities” (PRC Sections 30210-30224, 30234, 30234.5, and 30252).

- **Visual impact assessments** for coastal zone projects, including (among other considerations) line-of-site analyses; visual simulations; and sketches and photographic examples illustrating how project features—such as signage, bridge sections, railings, retaining and sound walls, and landscaping—potentially alter landforms or change the visual character of the project area. Illustrations should also show the project’s potential effects on public views to and along the shoreline, recreation and open-space areas, significant landforms, waterbodies, and inland mountains. The visual assessment should include views both to and from the proposed project. The alteration of natural landforms is to be minimized and project designs are to be visually compatible with the character of surrounding areas, including the natural contours and coastal resources of the site and architectural and historic features in the area. Changes in visual character and/or views to developed areas that consist of special communities, usually designated as such in LCPs, must also be considered. A visual impact assessment (along with visual simulations of the proposed project) is often prepared by a landscape architect and is required for any project located in a visual-protection overlay area that is identified in a certified LCP; or for a project located within an area adjacent to the shoreline or parkland, areas consisting of steep terrain and/or important vegetation; and for projects that have the potential to block public views to shoreline or inland scenic resources (PRC Section 30251).
- **Hazards assessments** for most new construction projects, requiring technical analysis and details specific to the project location. Components of a hazard assessment may include geotechnical and soils reports, watershed hydrological reports, floodplain impact analysis, estimates of 100-year shoreline erosion, wave run-up studies, evaluation of potential sea-level rise impacts, assessment of potential shoreline erosion issues during the useful life of the project, and analysis of structural and non-structural alternatives for responding to these potential hazard issues (PRC Sections 30235, 30236, and 30253).
- **Cultural resource assessments** for any project located within 100 feet of a known cultural resource or on sites not previously surveyed and considered sensitive for the occurrence of potential cultural resources (PRC Section 30244).
- **Comprehensive resource constraints mapping** with project overlay and detailed policy consistency analysis. The analysis should include an assessment of specific project features that may affect wetlands, ESHA, or agricultural resources, and should state whether those

project features are considered “permitted uses” in these resource areas consistent with Coastal Act or LCP resource protection policies, as applicable. Comprehensive resource constraints maps may also include scenic resources, hazardous areas, cultural resources (for confidential map products only), public access and recreation resources, and other resources as applicable. The purpose of the comprehensive resource constraints map and policy consistency analysis is to demonstrate that all coastal resources were considered in the location and design of a project and any potential competing resource protection needs for a project to support policy consistency findings.

4.3.2 Processing and Approval

The technical assessments are summarized in the project environmental document. For projects involving more than minor effects, each assessment is developed through coordination with the appropriate regulatory agencies to identify resource issues and options to avoid or minimize effects, and to develop appropriate avoidance, minimization, and/or mitigation measures for any unavoidable project impacts.

In order to provide adequate information to file a coastal development permit application, these technical reports may need to include project and environmental data that may not otherwise be required for CEQA or NEPA reviews. For example, under the CEQA, the baseline for environmental impact analysis consists of the existing site conditions at the time of the Notice of Preparation (NOP) or at the time environmental studies began. Under NEPA, the no-build alternative can be used as the baseline for comparing environmental impacts. However, for projects in the coastal zone, the baseline is not always considered to be the existing site conditions at the time of the NOP or at the time environmental studies began. Rather, the CCC may evaluate the baseline as the legally existing site conditions. If vegetation removal or development at the site occurred without a valid coastal development permit, for example, the CCC’s evaluation will be based on the site as if the vegetation had not been removed or if the development had not been constructed. Historic aerial photography, previous surveys, etc. are often used to determine baseline conditions.

The [Caltrans Coastal Resource Policy Checklist](#), identifies many of the coastal resource policy issues that often require technical documentation to support the application review process. The checklist also helps to identify common use restrictions, setback standards, policy concerns, and related considerations for each resource issue.

The permitting agencies (CCC or local government) will require a copy of the approved final environmental document as well as documentation of consultation with resource and regulatory agencies (e.g., U.S. Army Corps of Engineers, U.S. Fish and Wildlife Service, California Department of Fish and Wildlife, Regional Water Quality Control Boards), including permits and approvals from these agencies or, lacking that, copies of permit applications to the agencies.

4.4 Information for the Environmental Documentation

As required by the [Environmental Document Annotated Outlines](#), the environmental document must identify necessary permits and approvals, including permits or other determinations needed from the CCC or a local jurisdiction. The document also must summarize comments from and coordination with these coastal resource agencies. The coastal permit application process will be more efficient if the environmental document clearly identifies potential impacts to coastal resources; includes a thorough alternatives analysis addressing the feasibility of potential avoidance or minimization alternatives through project design features, siting options, and/or construction methods; and clearly identifies the proposed avoidance, minimization, and/or mitigation measures and any potential secondary impacts associated with implementing them.

4.4.1 Construction Impacts

Given the sensitivity of coastal resources, special planning may be required for construction activities. Potential construction impacts must be clearly identified and assessed as part of the environmental documentation and permit application processes. The CCC or local jurisdictions will often require project proponents to develop and implement measures to avoid or minimize these types of impacts. Some of the activities that should be evaluated for potential impacts include, but are not limited to, construction schedule (particularly during the summer and weekends); resource protection measures; staging areas; storage, vehicle/equipment maintenance and wash-out areas; access, excavation and disposal sites; false work; and traffic detours.

4.4.2 Timing the Studies with the Environmental Process

Generally, technical studies required for CCC reviews of the coastal development permit application must be current, meaning they are not more than 1 or 2 years old. Because the environmental review process may occur more than 1 or 2 years prior to the start of the CCC's review of a coastal development permit application (or review of a coastal development permit subject to an appeal), an updated letter/report is frequently required to ensure the most accurate data is available for CCC's review of the project.

4.4.3 Information Needed with the Draft and Final Environmental Document

The results of technical studies should be presented in the draft environmental document or used as supporting documentation for a categorical exemption, as appropriate. This is the stage of project development where all reporting should be complete. In addition, verify all information from the earlier RTP and PID stages (see above) and include:

- Description of the affected portion of the Coastal Zone Management Program
- Coastal Zone Management Program requirements for development that pertain to the project

- Potential impacts of the proposed project
- Evidence of coordination with the managing agencies

In addition to the information provided in the draft environmental document, the information below should be presented in the final environmental document:

- Include any comments received on coastal issues during the circulation of the draft environmental document, and the Department's responses.
- State coastal management agency's certification (preliminary) on the consistency of the project with the state Coastal Zone Management Program.

4.4.3.1 Activities That May Occur during Project Design

No construction activities are permitted in the coastal zone during the design phase. However, surveying, mapping, and other data gathering activities may be undertaken with no permits. For soil boring activities, subsurface geotechnical or archaeological investigations, or other activities requiring soil disturbance or that have the potential to impact sensitive coastal resources, the appropriate coastal zone permitting agency with jurisdiction over the project should be contacted for authorization or a determination that the activity is exempt from coastal development permit requirements.

The coastal development permit review process typically involves two primary steps: the first is review of and decision regarding the application; the second involves permit conditions with which the applicant must comply after the permit is approved but prior to the permit being issued. No construction activities are permitted until the applicant has complied with all conditions and the permitting agency has issued the permit. In some cases, condition compliance may take several months and should be considered when developing planning and construction schedules.

Note: Changes in the project design following approval of the environmental document may require revisions to the coastal permit application, or an amendment to the coastal permit if it has already been obtained. Such changes may also require that any applicable federal consistency review be re-opened. Significant design changes that result in new impacts, greater impacts, and/or substantial changes in the project description may require preparation of additional technical reports to support the coastal development permit and federal consistency review processes. See discussion under "Coastal Development Permit Amendment" section for additional information. Coordination with your local coastal liaison is also suggested.

4.4.3.2 Activities That May Occur during Construction

Copies of all coastal permits or determinations must be included in the Resident Engineer Pending File; Plans, Specifications, and Estimate; [Environmental Commitments Record](#); and the Resident Engineer's Book so that Construction is aware of all the conditions of the coastal

approval(s). The District’s environmental construction liaison or environmental coordinator actively monitors the construction activities to make sure that the permit conditions are being implemented in the field and to prepare and submit monitoring reports to the permitting agency when required.

Substantial deviations from permit requirements without prior authorization by the permitting agency may result in a stop-work order, additional conditions, avoidance, minimization, and mitigation measures, or permit revocation. See also discussion under “Enforcement.”

If the method of construction changes or a contract change order (CCO) is needed for a change in project design, then it may be necessary to obtain an amendment to the coastal permit or determination. The amendment must be approved before the CCO or other change is approved and implemented. See discussion under “Coastal Development Permit Amendment” section.

4.4.3.3 Considerations during Maintenance and Owner-Operator Activities

Generally, repair and maintenance activities that do not result in enlargement of the facility being serviced, and that will not have a risk of substantial adverse environmental impact, are excluded from a permit requirement. However, activities involving enlargement of the facility, excavation or fill outside the highway prism, or removal of sensitive vegetation and/or vegetation located close to a waterbody, coastal bluff/shoreline, or sensitive habitat area, will require a permit. Please see discussions under “Exemptions” and “Waivers,” including the 1978 [“Repair, Maintenance and Utility Hook-Up Exclusions from Permit Requirements”](#) published by the CCC.