

CALIFORNIA COASTAL COMMISSION

SOUTH CENTRAL COAST AREA
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STAFF REPORT: REGULAR CALENDAR

APPLICATION NO.: 4-96-028

APPLICANTS: Ana Harberger, Arnold Harberger, Bruce Royer, Helene Tagoni, Kenneth Vail, Gemma Vail, and Sol Vail

AGENT: John Mac Neil

PROJECT LOCATION: 1200 and 1316, North Topanga Canyon Boulevard, Topanga, Los Angeles County

PROJECT DESCRIPTION: Project "A": Lot Line Adjustment involving two (2) lots; and Project "B": Redivision of three (3) existing lots comprising of 7.18 acres into three (3) reconfigured lots. No new parcels are proposed. The lot line adjustment occurred in 1986 without benefit of a coastal development permit.

<u>Parcel</u>	<u>Applicant</u>	<u>Exist Lot Area</u> (gross)	<u>Proposed Lot Area</u> (gross)	<u>Assessor Parcel Nos.</u>
PROJECT A: Lot Line Adjustment				
Parcel 1:	Royer	0.57 acres	1.73 acres	4441-37-10; 4441-24-09,10,22
Parcel 2:	Harberger	17.33 acres	16.17 acres	4441-37-15
PROJECT B: Redivision				
Parcel 1:	Vails	7.18 acres	4.01 acres	4441-37-05,16,18; 4441-26-12
Parcel 2:	Tagoni	0.17 acres	3.17 acres	4441-25-05
Parcel 3:	Tagoni	0.20 acres	0.36 acres	4441-25-06

Plan Designations: Residential I, Rural Land II, and III
 Zoning: 1 du/acre, 1 du/2 acres, 1 du/5 acres

LOCAL APPROVALS RECEIVED: Project A, Completed Certificate of Compliance No. 100,312, recorded April 9, 1986, Department of Regional Planning, Los Angeles County; Project B, Approval in Concept, County of Los Angeles Regional Planning Department, dated 1/29/96 for proposed Certificate of Compliance No. 101,401.

SUBSTANTIVE FILE DOCUMENTS: Certified Malibu/Santa Monica Mountains Land Use Plan; Coastal Permit P-4946, Gottlieb; Coastal Permit 5-88-997, Vails; Coastal Permit Application 4-96-150, Rein et. al..

SUMMARY OF STAFF RECOMMENDATION: Staff recommends approval of the "after the fact", Lot Line Adjustment, and a Redivision of three (3) contiguous lots resulting in three (3) reconfigured lots. (Exhibit 10) The project site is located within Topanga Canyon about four and one half (4 1/2) miles inland. A total of five (5) lots are reconfigured (once Projects A and B are complete), two of which will include an area that is already restricted from future development through the transfer of development credit (TDC) program. The Lot Line Adjustment, Project A, affects two lots. Once the Lot Redivision, Project B, involving three (3) lots is completed, three (3) lots will remain; no new lots will be created. Each reconfigured lot either has an existing residence or includes a building site(s) for a future potential residence. A portion of some of these lots include degraded oak woodland. The private driveway accessing the lots east of Topanga Canyon Boulevard will need to be widened in the future to meet Los Angeles County Fire Department requirements for future residential construction for both the existing and proposed reconfigured lots. Widening the road to meet the Fire Code standard of 24 feet along one section will include minimal grading of about 800 cubic yards. The resultant parcel sizes meet the minimum parcel size required in the Los Angeles County Land Use Plan, except for new parcel 3 of Project B which will become less non-conforming and now includes a residence.

STAFF NOTE: This application was previously scheduled for the December 1996 agenda and postponed to the January 1997 agenda. The prior project then included three additional "after the fact" lot line adjustments (that are no longer included in this application and now in application number 4-97-081) and a redivision of three (3) lots. Staff discovered that three new property owners had acquired three separate parcels which were the subject of the application, but were not joined as applicants. Three of these lot line adjustments were withdrawn and resubmitted, separately as application number 4-97-081. Application number 4-97-081 is also scheduled for Commission action at the June 1997 meeting; staff is recommending that the coastal permit be waived. Since these three "after the fact" lot line adjustments result in a new lot configuration which the proposed lot redivision uses as a starting point and upon which the redivision is based, the three separate lot line adjustments must be acted on prior to the lot redivision. The other "after the fact" lot line adjustment, Project A, which is part of this application, is not directly affected by the other portions of these projects. As a result, the remaining property owners for this one "after the fact" lot line adjustment and the lot redivision wish to proceed with this pending application.

I. STAFF RECOMMENDATION

Approval with Conditions

The Commission hereby grants a permit for the proposed development, subject to the conditions below, on the grounds that, as conditioned, the development will be in conformity with the provisions of Chapter 3 of the California Coastal Act of 1976, will not prejudice the ability of the local government having jurisdiction over the area to prepare a Local Coastal program conforming to the provisions of Chapter 3 of the Coastal Act, and will not have any significant adverse impacts on the environment within the meaning of the California Environmental Quality Act.

II. Standard Conditions

1. Notice of Receipt and Acknowledgment. The permit is not valid and development shall not commence until a copy of the permit, signed by the permittee or authorized agent, acknowledging receipt of the permit and acceptance of the terms and conditions, is returned to the Commission office.
2. Expiration. If development has not commenced, the permit will expire two years from the date on which the Commission voted on the application. Development shall be pursued in a diligent manner and completed in a reasonable period of time. Application for extension of the permit must be made prior to the expiration date.
3. Compliance. All development must occur in strict compliance with the proposal as set forth below. Any deviation from the approved plans must be reviewed and approved by the staff and may require Commission approval.
4. Interpretation. Any questions of intent or interpretation of any condition will be resolved by the Executive Director or the Commission.
5. Inspections. The Commission staff shall be allowed to inspect the site and the development during construction, subject to 24-hour advance notice.
6. Assignment. The permit may be assigned to any qualified person, provided assignee files with the Commission an affidavit accepting all terms and conditions of the permit.
7. Terms and Conditions Run with the Land. These terms and conditions shall be perpetual, and it is the intention of the Commission and the permittee to bind all future owners and possessors of the subject property to the terms and conditions.

III. Special Conditions

1. REVISED OPEN SPACE DEED RESTRICTIONS FOR TDC LOTS

Prior to the issuance of the coastal development permit, the applicants / property owners shall execute and record two new transfer of development credit (TDC) recombination and open space deed restrictions, in a form and content acceptable to the Executive Director, to replace the original recombination and open space deed restriction recorded in Document Nos. 81-170422, 81-170423, and 90-2048599, with respect to Assessors Parcel Numbers 4441-026-12, 4441-37-05, 16, 18. Through the newly recorded documents, these former five TDC lots now known as APN 4441-026-12 on Exhibit 5 will be recombined as follows: the four northern TDC parcels labeled 8, 9, 10, and 11 will be recombined with new parcel 1 of Project B; the one southern TDC parcel labeled 12 will be recombined with new parcel two of project B as noted on Exhibit 5. All five of the affected TDC lots will remain dedicated as open space through these deed restrictions.

IV. Findings and Declarations.

A. Project Description and History

The project site is located within Topanga Canyon on the east side of Topanga Canyon Creek and Road and southwest of Silvia Park, about four and half (4 1/2) miles inland from the coast (Exhibits 1, 2, and 3). Two separate projects are proposed through this permit application. Project A, is an

"after the fact" lot line adjustment involving two (2) parcels (Exhibit 4) which includes one (1) existing residence (the parcel with the residence is marked with an 'R' on Exhibit 4, while the vacant parcel is marked with a 'V'). Project B, is a proposed redivision of three (3) lots into three reconfigured parcels. The larger lot, Existing Parcel one (1), now includes five (5) former transfer of development credit (TDC) lots which have been recombined and attached to it. (Exhibit 5) The applicants do not propose any changes to the development restrictions placed on this recombined parcel one.

Note: For the purpose of this report and easier identification of the affected parcels in Projects A and B, these parcels are numbered sequentially as noted on Exhibits 4 and 5. Exhibit 10 illustrates a summary of the existing lot configuration and the result of this application.

The following provides a historical perspective of prior land divisions and lot line adjustments in the vicinity of this project. In 1924, Tract No. 6943 created a large parcel about 28 acres in size surrounded by a large number of small lots to the west and south. Exhibit 3 identifies this large parcel in the Malibu/Santa Monica Mountains Build Out Study completed in 1978. Exhibit 3 identifies all existing parcels at that time.

In 1979, the Commission approved a four lot subdivision of this large 28 acre parcel, Coastal Permit P-4946, which created parcels one - four of Parcel Map No. 6501, recorded in 1981 as noted on Exhibit 6. The Commission's approval required the recording of a deed restriction prohibiting further subdivision of these four lots, except for Parcel four which is prohibited from further subdivision until the applicable Local Coastal Program is certified.

The following three lot line adjustments are "after the fact" and have not received a coastal development permit before they were recorded. These three lot line adjustments are the subject of application number 4-97-081 scheduled for Commission action at the June 1997 meeting.

In 1983, a Lot Line Adjustment was recorded affecting parcels one, three and four. Parcels one and three were increased in size by reducing the size of parcel four. (Exhibit 7) No coastal permit was approved for this Lot Line Adjustment recorded in 1983 and the next three lot line adjustments recorded in 1985, 1986, and 1988.

In 1985, a portion of parcel two was merged with an adjoining parcel, not a part of the original four lot subdivision. This Lot Line Adjustment 'eliminated' a portion of parcel two through the merger with an adjoining lot of Tract No. 6943. (Exhibit 8)

In 1986, a lot line adjustment occurred which is now part of this application and is known as Project A. A portion of parcel number four from the subdivision approved in Coastal Permit P-4946 (marked as parcel 2 on Exhibit 4) was merged with an adjoining parcel (marked as parcel 1 on Exhibit 4). This Lot Line Adjustment 'eliminated' a portion of this parcel through the merger with an adjoining lot.

In 1988, parcels one and three were enlarged by merging land from parcel four. These three unpermitted lot line adjustments (1983, 1985, and 1988) result in the configuration of the larger parcels in Projects A and B. (Exhibit 9)

Further, regarding Project B, the applicants propose to redivide existing parcel one which includes a Transfer of Development Credit (TDC) lot (lots which had development rights transferred to other lots and therefore have no development rights) and two unrestricted small lots into three (3) reconfigured lots (Exhibit 5). The applicant has characterized this redivision in the application as a Lot Line Adjustment. The TDC lot, which at one time consisted of five (5) small lots, was recombined and attached to parcel one at the time the development rights were restricted in 1981 and 1990. The development restrictions prohibiting development on these former TDC lots will remain after the redivision.

The two portions of the project, Project A and B, are identified below in the table listing lot sizes before and after the resulting parcel configurations.

	<u>Existing Lot Area(gross)</u>	<u>Proposed Lot Area(gross)</u>
PROJECT A: Lot Line Adjustment		
Parcel 1:	0.57 acres	1.73 acres
Parcel 2:	17.33 acres	16.17 acres
PROJECT B: Lot Redivision		
Parcel 1:	7.18 acres	4.01 acres
Parcel 2:	0.17 acres	3.17 acres
Parcel 3:	0.20 acres	0.36 acres

Staff notes that the applicants have described and characterized the development which is the subject of this application as Project B, as a series of lot line adjustments performed on three (3) contiguous parcels (Tentative Lot Line Adjustment Map No. CC 101,401). The applicants contend that beginning with three (3) contiguous lots, a series of lot line adjustments would be made, resulting ultimately in three reconfigured lots at the conclusion of all of the adjustments. The County of Los Angeles agreed with this characterization and processed the project without requiring that the applicants comply with the tentative map provisions of the Subdivision Map Act and related local ordinances. This description also originally appeared in the applicant's "project description" and other parts of the subject application for a coastal development permit. A lot line adjustment may be described generally as a shift in the boundary lines between two or more existing parcels, where land taken from one parcel is added to an adjacent parcel.

Regardless of the applicant's characterization of the proposed project as a "lot line adjustment" exempt from the mapping requirements of the Subdivision Map Act, the Commission finds the project to be a development subject to the coastal development permit requirements of the Coastal Act. Section 30106 of the Coastal Act defines development (in part) as a "... change in the density or intensity of use of land, including, but not limited to, subdivision pursuant to the Subdivision Map Act (commencing with Section 66410 of the Government Code), and any other division of land, including lot splits." (Emphasis added.) This definition applies to the applicants' project which proposes to modify the existing property boundary lines to redivide the current three (3) existing parcels into three (3) reconfigured lots.

The Commission notes that this determination that the applicant's project constitutes development within the meaning of the Coastal Act has no effect on the County's separate determination that the project constitutes a lot line adjustment for purposes of the Subdivision Map Act and the County's local permit requirements.

The Los Angeles County Land Use Plan designates portions of these parcels as: Residential I, one dwelling unit per acre; Rural Land II, one dwelling unit per two acres; and Rural Land III, one dwelling unit per five acres. The resulting parcel configurations meet the Land Use Plan (LUP) densities with the exception of new parcel 3, Project B, a non-conforming parcel. Although some of these parcels are located within a designated disturbed sensitive resource area, a disturbed oak woodland, neither the lot line adjustment or the lot redivision will result in the removal of any trees or vegetation, or require any grading.

In summary, the proposed redivision (Project B) involves three contiguous parcels and will result in three newly reconfigured lots. In effect, parcel numbers one (1), two (2), and three (3) will be redivided into new parcels. The result is that one parcel, old parcel three (3), is eliminated to create new parcel two (2); thus, no new parcels are created. (Exhibits 5 and 10)

B. New Development/ Cumulative Impacts

Section 30250 (a) of the Coastal Act provides that new development be located within or near existing developed areas able to accommodate it, with adequate public services, where it will not have significant adverse effects, either individually or cumulatively, on coastal resources:

New residential, commercial, or industrial development, except as otherwise provided in this division, shall be located within, contiguous with, or in close proximity to, existing developed areas able to accommodate it or, where such areas are not able to accommodate it, in other areas with adequate public services and where it will not have significant adverse effects, either individually or cumulatively, on coastal resources. In addition, land divisions, other than leases for agricultural uses, outside existing developed areas shall be permitted only where 50 percent of the usable parcels in the area have been developed and the created parcels would be no smaller than the average size of surrounding parcels.

Section 30105.5 of the Coastal Act defines the term "cumulatively", as it is applied in Section 30250(a) to mean that:

... the incremental effects of an individual project shall be reviewed in conjunction with the effects of past projects, the effects of other current projects, and the effects of probable future projects.

In addition, the certified Land Use Plan contains policy 271 and 273 (d) regarding lot line adjustments and land divisions. The LUP policy cited below has been found to be consistent with the Coastal Act and therefore, may be looked to as guidance by the Commission in determining consistency of the proposed project with the Coastal Act. Policy 271 states, in part, that:

New development in the Malibu Coastal Zone shall be guided by the Land Use Plan Map and all pertinent overlay categories. The land use plan map is inserted in the inside back pocket ...

The land use plan map presents a base land use designation for all properties. Onto this are overlaid three resource protection and management categories: (a) significant environmental resource areas, (b) significant visual resource areas, and (c) significant hazardous areas. For those parcels not overlaid by a resource management category, development can normally proceed according to the base land use classification and in conformance with all policies and standards contained herein. Residential density shall be based on an average for the project; density standards and other requirements of the plan shall not apply to lot line adjustments. (emphasis added)

The Coastal Act requires that new development, including land divisions, be permitted within contiguous, or in close proximity to existing developed areas or if outside such areas, only where public services are adequate and only where public access and coastal resources will not be cumulatively affected by such development. The Commission has repeatedly emphasized the need to address the cumulative impacts of new development in the Malibu and Santa Monica Mountains area in past permit actions. The Commission has reviewed land division applications to ensure that newly created or reconfigured parcels are of sufficient size, have access to roads and other utilities, are geologically stable and contain an appropriate potential building pad area where future structures can be developed consistent with the resource protection policies of the Coastal Act. In particular, the Commission has ensured that future development on new or reconfigured lots can minimize landform alteration and other visual impacts, and impacts to environmentally sensitive habitat areas.

The Commission has found that minimizing the cumulative impacts of new development is especially critical in the Malibu/Santa Monica Mountains area because of the large number of lots which already exist, many in remote, rugged mountain and canyon areas. From a comprehensive planning perspective, the potential development of thousands of existing undeveloped and poorly sited parcels in these mountains creates cumulative impacts on coastal resources and public access over time. Because of the large number of existing undeveloped parcels and potential future development, the demands on road capacity, public services, recreational facilities, and beaches could be expected to grow tremendously.

Part of this project site is located in the Topanga Canyon small lot subdivision. There are a number of such small lot subdivisions throughout the Santa Monica Mountains which were subdivided in the 1920's and 1930's into very small 'urban' scale lots. These subdivisions consist of parcels of less than one acre but generally ranging in size from 2,000 to 5,000 square feet. The small lot subdivision portion of the proposed project site is steep and includes numerous oak trees. These existing lots range in size from about 5,000 to about 8,000 square feet. The proposed project site consists of five larger parcels ranging in size from 0.57 acres to 16.17 acres. The proposed reconfiguration will result in five parcels ranging in size from 0.36 acres to 16.17 acres. The applicants propose Projects A and B, to adjust the lot lines of two existing parcels through a lot line adjustment (Exhibit 4), and redivide three contiguous lots into three reconfigured lots. (Exhibit 5, Tentative Lot Line Adjustment Map Certificate of Compliance # 101,401) In the end, two of these parcels have an existing residence (marked with a 'R') while three parcels are vacant (marked with a 'V'). (see Exhibits 4 and 5) Therefore, the applicants are proposing to reconfigure the proposed project site so that the size range of the five parcels will be less than the existing

range. In other words, the proposed parcels will be more like each other in size rather than the existing configuration where some lots are quite large and some lots are extremely small.

1. Malibu/Santa Monica Mountains Land Use Plan Designations

In past permit actions, the Commission has looked to the land use designations of the certified Malibu/Santa Monica Mountains Land Use Plan for guidance on the maximum allowable density and intensity of land use that may be permitted in any particular area. The Land Use Plan designated the proposed project site for three density categories: one, Residential I which allows one dwelling unit per one acre of land; two, Rural Land II which allows one dwelling unit per two acres of land; and three, Rural Land III which allows for one dwelling unit per five acres of land.

Based on these density designations, the proposed reconfigured parcels do conform with the maximum allowable density, except for one parcel which is less than one acre in size. However, the reconfiguration proposed in Project B will result in this smaller parcel increasing in size while maintaining the overall density of the proposed project site. Further, this small parcel will be increased in size to more closely conform to density standards of one dwelling unit per acre. This parcel (existing parcel 2) already includes an existing residence. (Exhibit 5) New parcels one (1) and two (2) even with the land area of the TDC restricted lot subtracted (about one half acre) still meet the LUP densities of one dwelling unit per two acres. Both of these parcels are greater than two acres in size. Lastly, only one parcel, Parcel number two (2), Project A, will continue to be of a size (16.17 acres) to potentially allow it to be divided into three parcels, according to the land use plan density designation of one dwelling unit per five acres.

2. Section 30250 (a) Requirements

Although the certified Land Use Plan provides guidance in the form of standards for density and intensity of development, the Commission must also review land divisions for consistency with the Coastal Act. In this case, because the proposed project site is located outside the developed coastal terrace area, the criteria provided in Section 30250 (a) is applicable. This section provides that land divisions shall be permitted when: one, 50 percent of the usable parcels in the area have been developed; and two, the created parcels would be no smaller than the average size of the surrounding parcels. These requirements are to ensure that development in areas that have adequate public services. In other words, this policy is to prevent the 'leap frogging' of new development into undeveloped areas, thereby preventing the potentially significant adverse impacts of such development on coastal resources.

a. 50 Percent of Usable Parcels Criterion.

The first technical requirement of Section 30250(a) of the Coastal Act is regarding land divisions outside existing developed areas. That section requires that such land divisions be permitted only where 50 percent of the usable parcels in the area have been developed and where other criteria are met. The Commission has found, in past permit decisions, that "existing developed area" for the Malibu area applies only to the urbanized strip, or coastal terrace, along Pacific Coast Highway, and does not apply to the interior of the Santa Monica Mountains. The Commission has further found that

the area addressed by the 50 percent criterion is the market area, amounting to the entire Malibu/Santa Monica Mountains coastal zone. Within that area, a majority of the existing parcels are not yet developed, thus causing all proposed land divisions outside the coastal terrace to fail the required 50 percent test of Section 30250(a).

Based on these concerns, the Commission, in the past, found no alternative but to deny a number of land division permits. It was only with the institution of the transfer of development credit program (TDC) that the Commission found a mechanism by which the cumulative impacts could be mitigated and the 50 percent requirement could be met. The creation of new parcels is mitigated by extinguishing existing parcels, thereby ensuring that no net increase in the overall number of lots occurs within the market area. Since the number of usable parcels is not increased by land divisions, the 50 percent criterion is, in effect, met. In the case of the proposed Project B, three existing parcels would be redivided into three reconfigured lots. As such, no additional parcels would be created. The maximum density allowed and the total number of residential units that could be permitted on the proposed project site would not be altered by this portion of the proposed project. Therefore, in keeping with the Commission's prior actions determining that ensuring no net increase in the overall number of lots met the 50 percent criterion, the proposed project is found consistent with this requirement.

b. Average Lot Size Criterion.

With regard to the average lot size standard, the first step to making the determination required under Section 30250(a) of the Coastal Act is to choose a representative "surrounding area". Next, using assessor's records, the number of parcels within the surrounding area would be determined. Lastly, an average lot size analysis would be made for the surrounding area. To determine the appropriate surrounding area in the Santa Monica Mountains, the Commission has, in past permit decisions, considered the average and median lot size within one-quarter of a mile, taking into account major topographic features. In *Billings v. California Coastal Commission*, the court examined the use of an arithmetic mean to determine the size of lots that was typical for a geographic area. In *Billings*, the court rejected the Commission's past use of the arithmetic mean to determine the "average" lot size and rather found the use of a median or mode to be more appropriate. The Commission has found that the mode as a method of calculating the average is of limited utility, and has determined that the median is the best method of determining the average lot size. In *Billings*, the court also rejected the arbitrary delineation of a 1/4 mile radius as the sole criterion for determining the appropriate surrounding area, and instead found that it was appropriate to also take into account major topographic features to delineate the surrounding area.

In this case, staff determined the appropriate "surrounding area" and calculated the "average" lot size. The proposed project site is located on the east side of Topanga Canyon. Staff determined that the major topographic features that define the surrounding area is this canyon. As such, the surrounding area was defined as including the slopes of both sides of the canyon down to the canyon bottom. Within this surrounding area, which includes three small lot subdivisions, staff identified about 581 lots. The median lot size of the surrounding area is about 6,500 sq. ft.. Based on this analysis, even the smallest of the reconfigured lots at 15,880 sq. ft. or 0.36 acres would be no smaller than the average size of surrounding parcels, consistent with Section 30250(a).

3. Transfer of Development Credit Lots

One of the existing parcels, parcel one, Project B, includes five former TDC lots which have been recombined with parcel one. The applicant proposes through the redivision to add the land area of four of these former TDC lots to the new parcel one and the land area of one former TDC lot to the new parcel two. It is important to note that once the development rights of TDC lots are transferred to another lot, the TDC lots are then joined to or combined with an adjoining lot. No further development of a TDC lot is allowed for residential purposes in any event, other than for very minor accessory developments. Since these five TDC lots have been recombined with an existing developable parcel (Existing parcel 1, Project B) and the applicants now propose to redivide this parcel into two different parcels, the recombination open space deed restriction needs to be replaced and superceded with two new recombination and open space deed restrictions for each redivided parcel. This will ensure the applicant, as well as future land owners are aware that these recombined TDC lots are to remain in open space in perpetuity. Condition number one (1) provides for these new recorded documents. No additional development on the TDC restricted portions of these parcels will be allowed as a result of this redivision. Therefore, the Commission finds that the proposed project, as conditioned, is consistent with Coastal Act section 30250.

C. Coastal Resources.

In addition to the previously noted criteria, Section 30250(a) states that new development should be located where it will not have significant adverse effects, either individually or cumulatively, on coastal resources. It is, thus, necessary to also review the proposed project for any significant impacts on coastal resources.

As discussed above, the applicants propose the subject lot reconfiguration in order to facilitate residential development of the proposed project sites. Regarding Project B, the existing small lot subdivision lot (Exhibit 5, existing parcel 3) is very small in size and very steeply sloping from Topanga Canyon Boulevard. It would be very difficult at best to provide a driveway, fire truck turnaround, garage, septic system and home on a very small lot, in particular for existing parcel three (3), Project B (Exhibit 5). It is likely that substantial amounts of landform alteration (grading) and a number of oak trees would be removed or adversely impacted to develop the lot (as was done with the development of the adjoining lot). The applicant's agent has estimated that about 750 cubic yards of grading would be necessary to construct a residence similar to the one that exists on the adjoining parcel (existing parcel 2, Exhibit 5). Therefore, the cumulative impacts of developing this small lot with a residence would be substantial.

Instead, the applicants propose to reconfigure the project site such that only one home would be constructed in this small lot area, as existing parcels two (2) and three (3) would be merged together and known as new parcel three (3). The remainder of the project site includes building pads where residences could be built in the future on two of the remaining undeveloped parcels, new parcel one (1) and two (2). These building sites are not located on the portions of the lots restricted through the TDC program. These parcels are accessed by an existing private driveway further discussed below.

1. Hazards/Landform Alteration

Section 30253 of the Coastal Act states, in part, that new development shall:

(1) Minimize risks to life and property in areas of high geologic, flood, and fire hazard.

(2) Assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs.

Section 30251 of the Coastal Act states that:

The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas. New development in highly scenic areas such as those designated in the California Coastline Preservation and Recreation Plan prepared by the Department of Parks and Recreation and by local government shall be subordinate to the character of its setting.

a. Geologic Stability

The proposed development is located in the Santa Monica Mountains, an area which is generally considered to be subject to an unusually high amount of natural hazards. Geologic hazards common to this area include landslides, erosion, and flooding.

Regarding Project B, the resulting parcel reconfigurations will provide for potential development of two separate parcels that each have at least one flat building pad, respectively (new parcels one and two, Exhibit 5). Regarding new parcel one, a coastal permit (5-88-997) was approved for the construction of a residence in 1989 by the Commission. No residence was constructed and the coastal permit has expired. The Commission found the site stable from a geologic standpoint and was able to accommodate a septic system consistent with building code requirements. Two level building sites (the second is relatively flat at a lower elevation) exist on the new proposed parcel two (Exhibit 5).

Given the close proximity to this previously approved building site on existing parcel one, Project B, the building site on new parcel two are also likely to have adequate geologic stability and percolation rates to accommodate future single family residences. If residential development is proposed on any of these sites in the future a more detailed geologic and soils assessment will be required to ensure the proposed structures are stable from a geologic standpoint and the septic systems have adequate percolation. However, based on the preliminary geologic assessment, future residences can be located in geologically stable areas.

Regarding Project A, (lot line adjustment) the resulting parcel reconfiguration will not affect potential building sites. Two relatively level building sites exist on parcel two, Project A. Parcel one includes an existing residence.

b. Landform Alteration/Fire Hazard

Section 30251, as noted above, requires that permitted development be sited and designed to protect views to and along the ocean and scenic areas, to minimize alteration of natural land forms, and be visually compatible with the character of surrounding areas.

In addition to Section 30253(a) which requires that development minimize risks to life and property from fire hazard, the Malibu/Santa Monica Mountains Land Use Plan (LUP) includes the following policies that pertain to fire hazard and to grading and landform alteration. The LUP policies cited below have been found to be consistent with the Coastal Act and therefore, may be looked to as guidance by the Commission in determining consistency of the proposed project with the Coastal Act.

P82 Grading shall be minimized for all new development to ensure the potential negative effects of runoff and erosion on these resources are minimized.

P125 New development shall be sited and designed to protect public views from LCP-designated scenic highways to and along the shoreline and to scenic coastal areas, including public parklands. Where physically and economically feasible, development on sloped terrain should be set below road grade.

P130 In highly scenic areas and along scenic highways, new development (including buildings, fences, paved areas, signs, and landscaping) shall:

be sited and designed to protect views to and along the ocean and to and along other scenic features, as defined and identified in the Malibu LCP.

minimize the alteration of natural landforms.

be landscaped to conceal raw-cut slopes.

be visually compatible with and subordinate to the character of its setting.

be sited so as not to significantly intrude into the skyline as seen from public viewing places.

P134 Structures shall be sited to conform to the natural topography, as feasible. Massive grading and reconfiguration of the site shall be discouraged.

P137 Clustering of development in suitable areas shall be encouraged as a means to facilitate greater view protection.

P142 New development along scenic roadways as designated in Figure 8 shall be set below the road grade on the down hill side wherever feasible, to protect designated scenic canyon and ocean views.

P156 Continue to evaluate all new development for impact on, and from, fire hazard.

P159 Continue present requirements on all new development for emergency vehicle access and fire-flow water supply as determined by the Forester and Fire Warden until such time as alternative mitigation measures providing an equivalent degree of safety are developed and implemented.

To address the fire hazard and potential landform alteration issues, staff conducted a site visit and contacted the Los Angeles County Fire Department regarding the road access to future residential development resulting from the proposed project.

Regarding Project A there is no change in the road access as a result of the lot line adjustment. In Project A, (Exhibit 4) the existing residence on parcel 1 is accessed from Topanga Canyon Boulevard before and after the lot line adjustment is completed. The existing vacant lot, parcel 2, is accessed from the private driveway leading southeast from Topanga Canyon Boulevard before and after the lot line adjustment is completed.

Regarding Project B, all of the subject lots include existing road access to each of the three reconfigured parcels from either Topanga Canyon Boulevard or a private driveway accessed from Topanga Canyon Boulevard. In Project B, (Exhibit 5) parcel 1 is a vacant lot, that is accessed from the same private road before and after the proposed redivision is complete. Existing parcel 2 includes a residence accessed by a short driveway from Topanga Canyon Boulevard. After the redivision is complete, parcel 2 will be joined with parcel 3, which is now vacant; no new access driveway will be needed to serve the existing residence that already has a short driveway. The new parcel 2, as a result of the redivision, is a vacant parcel that will be accessed from the same private road.

Regarding building sites for Project B, the two new parcels, one and two include building pads that are accessed from the private road. Staff's visit to the site confirmed that the proposed building pad locations are the flatter areas of the sites and that there is the potential to create, at the same grade, short driveways from the existing private road to a potential building site on each parcel. Parcel two also includes a second building site, a relatively flat area about fifty feet below the existing pad to the west.

As a result, it appears to staff that a driveway and home could be constructed on each of the two reconfigured lots in a manner that minimizes landform alteration. Reconfigured parcel three includes an existing residence and short driveway, no further grading is needed. However, the private road may need to be widened up to twenty-six (26) feet to access two of the reconfigured parcels, new parcel 1 and 2 and the other two parcels at the end of the road. This road now accesses five lots, three of which have existing residences. Once the redivision is complete, this private road will access six lots, three lots would be vacant while three others are developed with residences. The private driveway ranges from eleven (11) to twenty-five (25) feet wide as further discussed below. Staff discussions with the Los Angeles County Fire Department, Fire Prevention Division indicate that the full development of either five existing or six proposed lots may require widening of the private road to a maximum of twenty-six (26) feet to meet fire code requirements at the time additional residences are constructed. As a result of Project B, one additional lot would be accessed from this private road.

Its important to note that there is no difference in the road widening requirements if this road is accessed with either the five existing and six proposed lots.

According to the Fire Department, the end of a private road may also be progressively reduced to 24 feet wide from 26 feet to access the remaining three or four lots and reduced to 20 feet wide to access the last one or two lots. According to the Fire Department, road widening requirements are recommended to County decision makers on a case by case basis and would be determined at the time residential construction is proposed. In this case, the Fire Department may recommend that the section of the private road accessing the first two lots from Topanga Canyon Boulevard be widened to 26 feet, the section of the road accessing the next two lots (Project B, parcels one (1) and two (2)) be widened to 24 feet, and the section of the road accessing the final two lots be widened to 20 feet. Road widening to accommodate new development can be reduced to 20 feet for a short section (about 25 lineal feet) to protect a significant tree or pass a steep section of a slope. Specific recommendations of the Fire Department to the Department of Regional Planning, Los Angeles County, would be made at the time residential construction were proposed. Therefore, it is possible to widen the private road to accommodate the requirements of the Fire Department to minimize fire hazard risks to future development on these reconfigured parcels.

The initial portion of the private road leading up a cut grade from Topanga Canyon Boulevard is between about twenty-two to twenty-five feet wide, with open drainage ditches along each side. The next 200 foot section crossing a relatively flat ridge is also between about twenty-two to twenty-five feet wide, which accesses new parcel one (1). The final 200 foot section which accesses the last three lots (including new parcel two (2)) ranges from eleven (11) to nineteen (19) feet wide. The narrowest portion, at 11 feet, is where an existing fire hydrant is located within the 40 foot road right-of-way. Although this portion of the road follows a steep portion of the hillside, the widening of the road to meet Fire Department standards is possible with a cut into the hillside upslope and a fill to the downslope, supported by retaining walls. The applicant has estimated that this cut and fill for widening the final 200 foot section of the road to 24 feet wide could be completed with about 400 cubic feet of cut on the uphill side. The cut material would be placed on the downslope. Unlike the Rein, et. al. redivision permit application (number 4-96-150), recently denied by the Commission, which required massive grading to gain access to a remote ridgeline, the 800 cubic yards of grading required to improve this access road will result in minimal landform alteration.

Although the applicant's have not submitted grading plans for road improvements based on site topography, it can be determined from, the length of roadway section to be widened and the Commission's experience with similar road improvements in the Santa Monica Mountains, this relatively short stretch of roadway can be improved to the Fire Department standard of 24 feet (for this middle section of the roadway) consistent with the landform alteration and visual resource protection policies of the Coastal Act, because it appears a minimal amount of grading is needed. When future residences are proposed on the reconfigured parcels, detailed grading plans will be reviewed by the Commission to ensure that landform alteration and vegetation removal is minimized and that proper drainage is incorporated into the design. In addition, the potential visual impacts of grading the hillside to widen the road will be minimal as this road is not visible from Topanga Canyon Road, a scenic highway. Additional mitigation, including immediate replanting with native species would be required at the time the road widening is proposed.

The potential impacts of widening this roadway are less significant compared to the potential impacts of developing the 8,500 sq. ft. lot (existing lot 3, Exhibit 5) along Topanga Canyon Boulevard. It's important to note that as a result of Project B, this vacant lot will be added to another lot with a residence, therefore eliminating the need for driveway access directly from Topanga Canyon Boulevard. As a result, a significant landform alteration will not occur, a cut in the hillside of about 750 cubic yards, because a new residence will not be cut into the hillside along Topanga Canyon Boulevard as was done for the existing residence on the adjoining lot at 1316 Topanga Canyon Boulevard. Eliminating the potential for this grading also reduces potential visual impacts as seen by the public along the LUP scenic designated Topanga Canyon Boulevard. In addition, a number of significant oak trees would be removed or adversely affected. Further, the parcel would be accessed directly off of Topanga Canyon Blvd. which is a very busy State Highway. Finally, as previously mentioned, as proposed the reconfigured lots have relatively level building sites and would not require significant grading or the removal of oak trees.

Therefore, as proposed the project, as proposed, is consistent with Sections 30251 and 30253 of the Coastal Act.

2. Environmentally Sensitive Habitat Areas

Section 30240 of the Coastal Act states that:

(a) Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on such resources shall be allowed within such areas.

(b) Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade such areas, and shall be compatible with the continuance of such habitat areas.

The proposed project site is located on the east side of Topanga Canyon. Although there are no environmentally sensitive habitat areas on the project site, the Malibu/Santa Monica Mountains Land Use Plan indicates that the west hillsides of these parcels along Topanga Canyon Road are designated as a disturbed Significant Oak Woodland. This designated area is located along the lower elevation portion of these parcels and is considered disturbed oak woodlands. Project A does not impact this designated habitat as the potential building sites are located outside of the oak woodlands. The existing residence on parcel one will include additional land as a result of this lot line adjustment. Regarding Project B, existing parcels two (2) and three (3), include disturbed oak woodlands. The potential building sites on parcels two and three are also located outside of the oak woodlands. It is important to note that the ESHA designated in the Land Use Plan is located along Topanga Creek opposite Topanga Canyon Road, well beyond the project site.

Excessive grading or vegetation removal on these parcels could directly impact the ESHA and significant oak woodlands by contributing to increased runoff, erosion, and sedimentation. However, the grading associated with the future road widening will be minimal and located about 600 feet beyond the ESHA; therefore, the ESHA will not be adversely impacted.

In summary, the proposed configuration is preferred when compared to the existing configuration. The existing lot configuration provides for a potential residence on existing parcel 3, Project B. This site has the potential to impact the oak woodland, and the designated ESHA across Topanga Canyon Road as a result of the landform alteration needed to construct a building pad and driveway. On other hand, the proposed configuration will eliminate a potential residence on parcel 3, while transferring it to new parcel two. New parcel two already has two potential building sites, one which exists on a flat pad located about 500 feet from the designated ESHA along Topanga Road and outside the oak woodland. The grading required to widen the road is minimal and will not adversely impact the oak woodland or the ESHA. In fact, the road widening will be required with or without the proposed project to access existing potential building sites on Parcel 1, Project B and Parcel two, Project A. Therefore, for these reasons, the future residential development of the proposed redivision is preferable compared to the existing lot configuration relative to potential impacts to coastal resources.

The Commission's past experience with lot redivisions supports the conclusion here that this application is consistent with the Coastal Act. The proposed redivision is different from the Rein et. al. application (4-96-150) because the development of the reconfigured lots would not require massive landform alteration (over 100,000 cubic yards of grading) to existing and proposed access roads or a significant fire risk, and the Rein project did. Further, the proposed redivision would not create significant visual impacts as seen from Topanga State Park as a result of the landform alteration proposed in the Rein et. al. application. The proposed redivision would not create potential impacts to Topanga Creek or Greenleaf Creek, designated as ESHA, as a result of minimal landform alteration.

And lastly, because the proposed project does not involve any physical development, no adverse impacts to the designated disturbed oak woodland, or the designated ESHA, will occur. Therefore, as proposed, the project will not result in any adverse impacts on environmentally sensitive resources, and thus, as proposed is consistent with Section 30240 of the Coastal Act.

3. Septic Systems.

Section 30231 of the Coastal Act states that:

The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface water flow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, minimizing alteration of natural streams.

The Commission recognizes that the potential build-out of lots in Malibu, and the resultant installation of septic systems, may contribute to adverse health effects and geologic hazards in the local area. As noted above, one of these parcels, new parcel one (1), Project B, included an approved coastal permit 5-88-997. The coastal permit included the construction of a sewage disposal system, as approved in concept by Los Angeles County Health Department. As

noted above, the residence and sewage disposal system was not constructed and the permit expired.

The applicants do not, at this time, propose any construction of structures or septic systems. At such time as coastal development permit applications are reviewed for development of the reconfigured undeveloped lots, a full geologic evaluation which includes percolation testing will be necessary to ensure adequate percolation exists to accommodate effluent disposal. However, based on the staff's preliminary geologic assessment in coastal permit number 5-88-997 and the fact that two existing residences are located in the immediate vicinity, future residences can be located such that adequate septic systems can be provided. Additionally, any proposed septic systems for structures on the reconfigured lots would be more widely spaced than if structures were constructed on the existing lots. Necessary geology and soils analysis would be completed and any proposed septic system would be designed at the time a new residence is proposed for the review and approval of the County and Commission. For the small lot portion of the proposed project site (proposed parcel three (3), Project B, Exhibit 5), only one septic system would need to be provided under the proposed reconfiguration; it already exists to serve the existing residence on the adjoining lot proposed for a lot merger. Therefore, the project is consistent, as conditioned, with Section 30231 of the Coastal Act.

4. Conclusion.

In conclusion, the proposed redivision of three parcels into three parcels, and the lot line adjustment discussed above are consistent with the 50 percent and the average lot size criteria of Section 30250(a). While one of the proposed lots will not be completely consistent with the land use designations of the LUP (the two small lots merged together will become less non-conforming), no additional lots will be created and the overall density of the proposed project site will not be increased. Finally, although site-specific evaluations will have to be made at the time that coastal development permit applications are submitted for structures on the reconfigured parcels, this proposed project will have no adverse impacts on coastal resources. Therefore, the Commission finds that the proposed project, as conditioned, is consistent with Section 30250(a) of the Coastal Act.

In addition, the reconfigured parcels will effectively be limited in terms of any further land divisions, with the exception of parcel two, Project A, because any further divisions would not be in conformance with the underlying land use plan density designations. (The TDC lots do not provide additional land that might allow further land divisions of the lots resulting from the redivision, Project B.) The only parcel that could potentially be divided under the Land Use Plan designations is parcel two, Project A, which is located in an area designated for five acre minimum parcels. Prior to this lot line adjustment, this parcel (Exhibit 4) was 17.33 acres in size; in the end it will be 16.17 acres in size, thereby continuing to provide acreage for a potential of three lots. However, this parcel appears to have only two potential building sites. Therefore, the proposed lot line adjustment and the lot redivision is consistent as conditioned with the Chapter three policies of the Coastal Act.

C. Violation

Although development has taken place prior to submission of this permit application (Project A, the lot line adjustment discussed above), consideration of the application by the Commission has been based solely upon the Chapter 3 policies of the Coastal Act. Review of this permit does not constitute a waiver of any legal action with regard to any violation of the Coastal Act that may have occurred.

D. Local Coastal Program

Section 30604 of the Coastal Act states that:

(a) Prior to certification of the local coastal program, a coastal development permit shall be issued if the issuing agency, or the commission on appeal, finds that the proposed development is in conformity with Chapter 3 (commencing with Section 30200) and that the permitted development will not prejudice the ability of the local government to prepare a local coastal program that is in conformity with Chapter 3 (commencing with Section 30200).

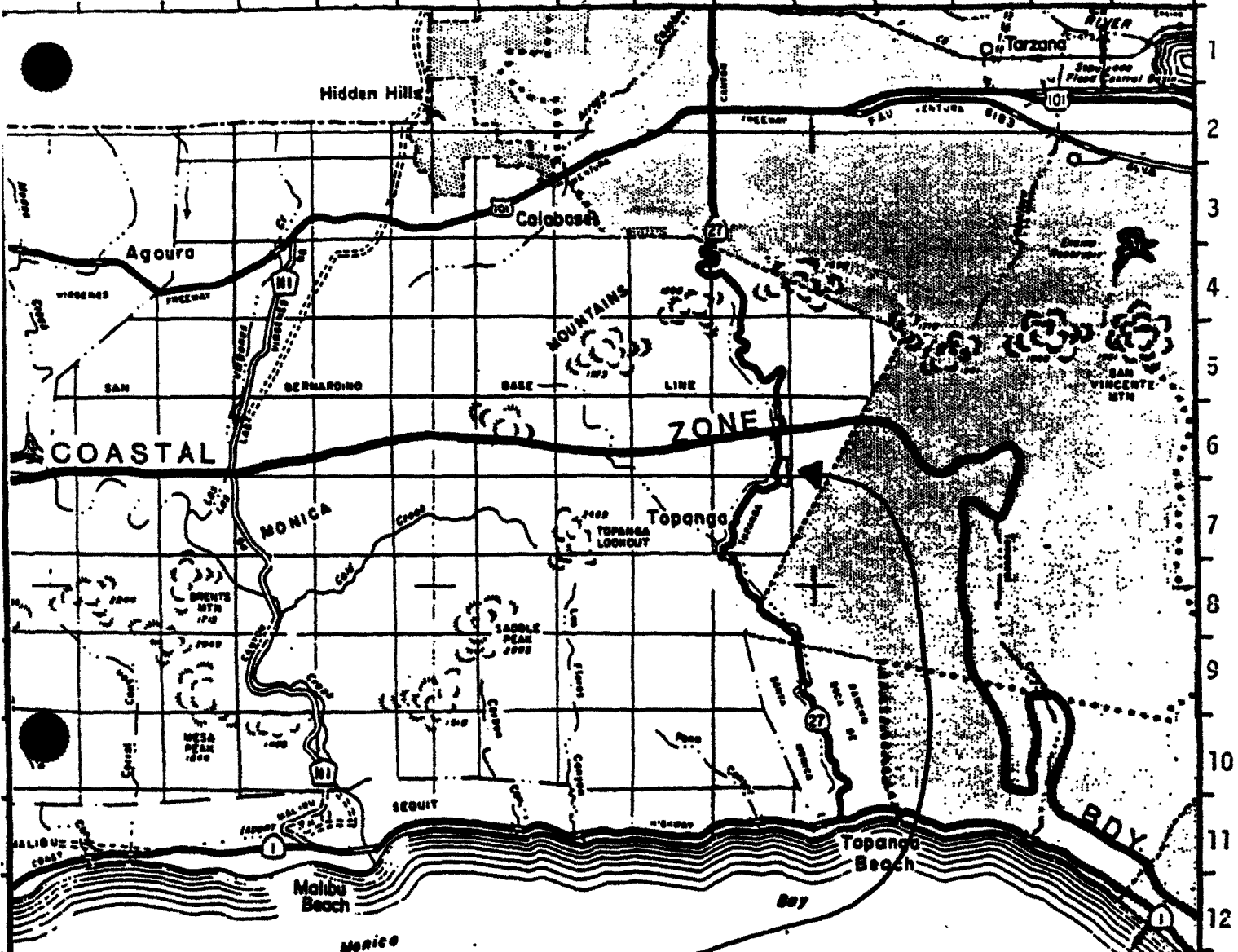
Section 30604(a) of the Coastal Act provides that the Commission shall issue a coastal permit only if the project will not prejudice the ability of the local government having jurisdiction to prepare a Local Coastal Program which conforms with Chapter 3 policies of the Coastal Act. The preceding sections provide findings that the proposed project will be in conformity with the provisions of Chapter 3. The proposed development will not create adverse impacts and is found to be consistent with the applicable policies contained in Chapter 3. Therefore, the Commission finds that approval of the proposed development will not prejudice the County of Los Angeles' ability to prepare a Local Coastal Program for this area of the Santa Monica Mountains that is also consistent with the policies of Chapter 3 of the Coastal Act as required by Section 30604(a).

E. California Environmental Quality Act

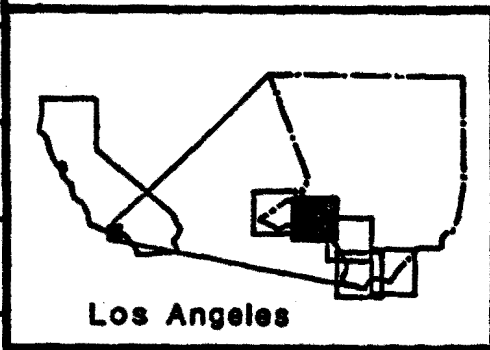
The Coastal Commission's permit process has been designated as the functional equivalent of CEQA. Section 13096(a) of the California Code of Regulations requires Commission approval of Coastal Development Permit applications to be supported by a finding showing the application to be consistent with any applicable requirements of CEQA. Section 21080.5 (d)(2)(i) of CEQA prohibits a proposed development from being approved if there are feasible alternatives or feasible mitigation measures available that would substantially lessen any significant adverse impacts that the activity may have on the environment.

The proposed project will not have significant adverse effects on the environment within the meaning of the California Environmental Quality Act of 1970. Therefore, the proposed project has been determined to be consistent with CEQA and the policies of the Coastal Act.

A B C D E F G H I J K L M N O



Project site SANTA MONICA

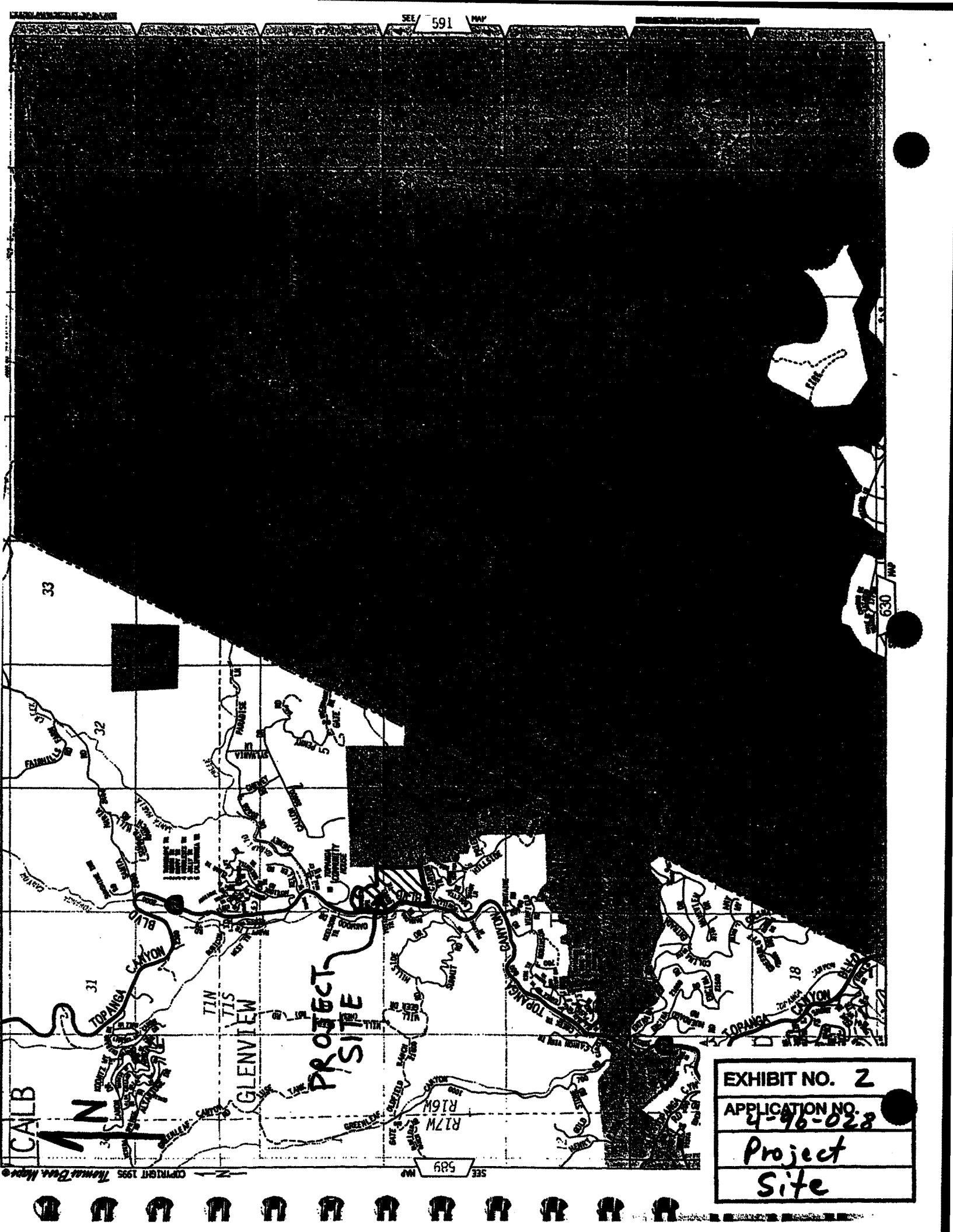


Los Angeles

EXHIBIT NO. 1
APPLICATION NO. 4-96-028
Project
Location

LOCATION MAP





33

32

31

CALIFORNIA

PROJECT SITE

GLENVIEW

589

EXHIBIT NO. 2
APPLICATION NO. 820-96-028
Project Site

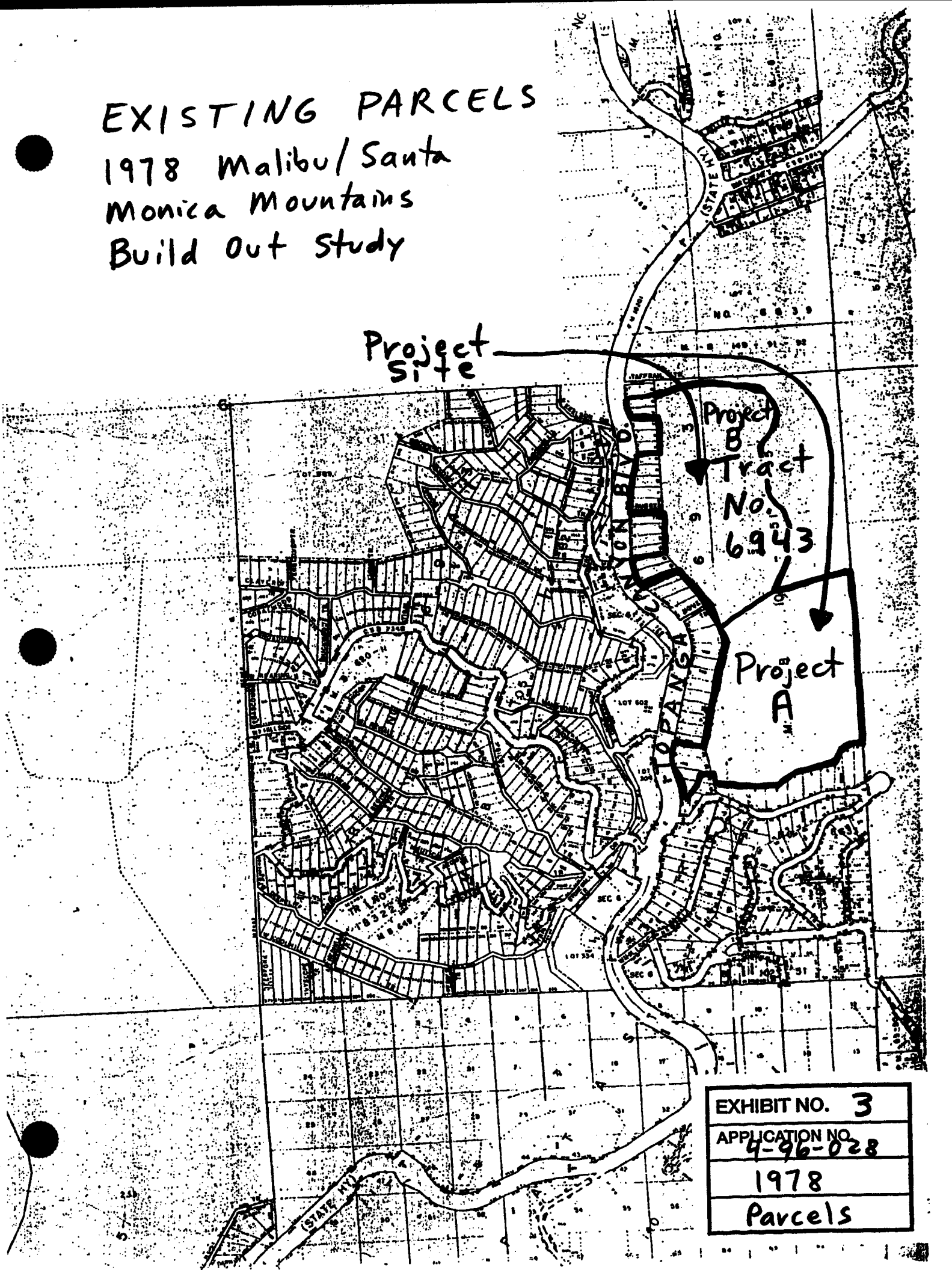
EXISTING PARCELS
1978 Malibu/Santa
Monica Mountains
Build Out Study

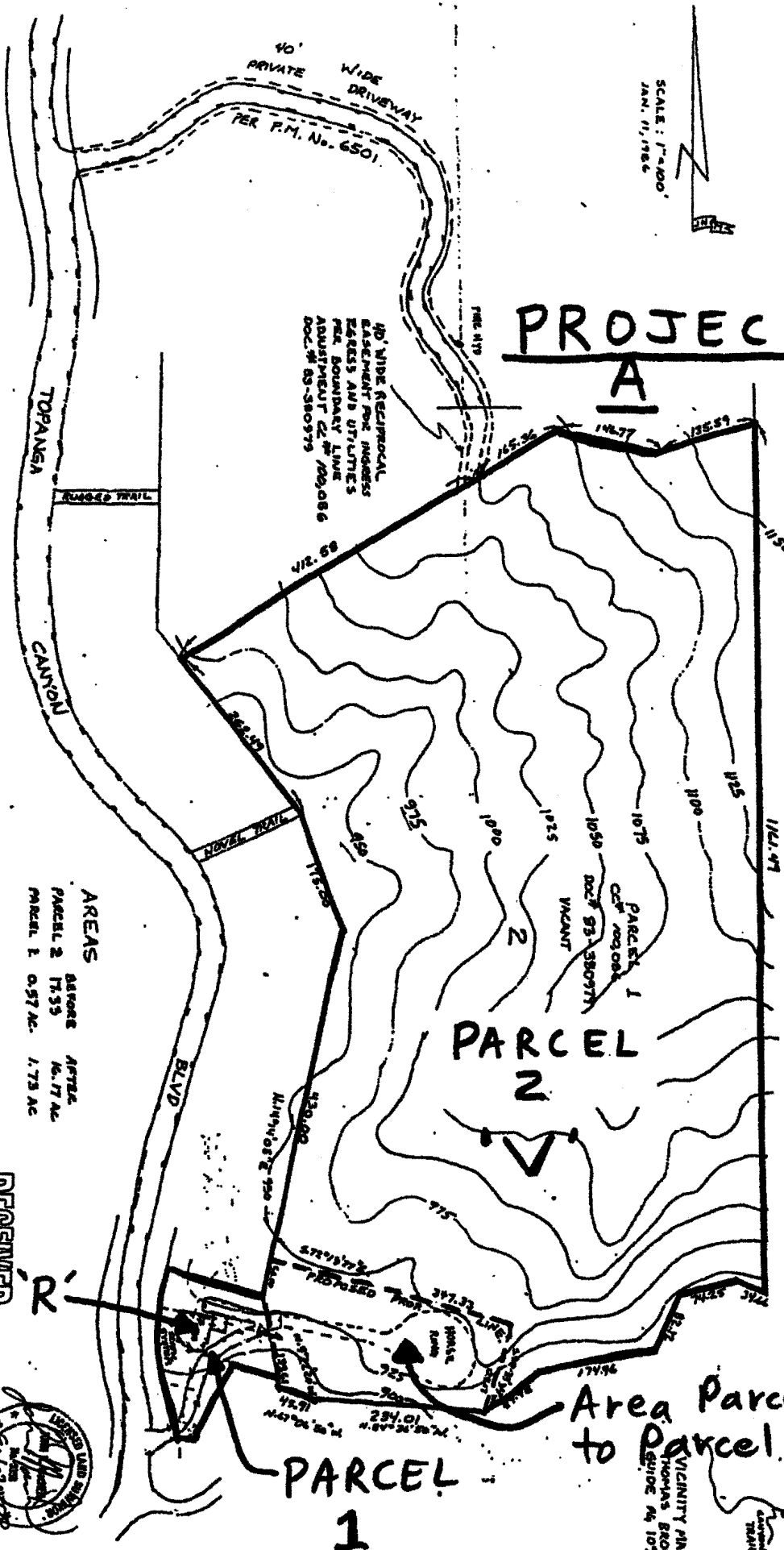
Project
Site

Project
B
Tract
No.
6943

Project
A

EXHIBIT NO. 3
APPLICATION NO. 4-96-028
1978
Parcels





PROJECT A

RECEIVED
AUG - 1 1986
Landscape
CONTRACT COMMENCED
FROM CHINA COURT BLDG.

CC # 100,312
BRING A LOT LINE ADJUSTMENT BETWEEN
PARCEL 1 OF PARCEL MAP 6501 PMS 1/4
AS MODIFIED BY CCA # 10908 AND LOTS 33
34, 35, 36, 37 AND 38 OF TRACT No. 6943 MS. 102 9/85
AS MODIFIED BY CCA # 100, 194

AREAS
PARCEL 2 17.55 AC
PARCEL 1 0.57 AC
APPROX. 1.73 AC

EXHIBIT NO. 4
APPLICATION NO. 4-96-028
Project A
Lot Line Admt.

Area Parcel 2 Joined to Parcel 1

RECEIVED

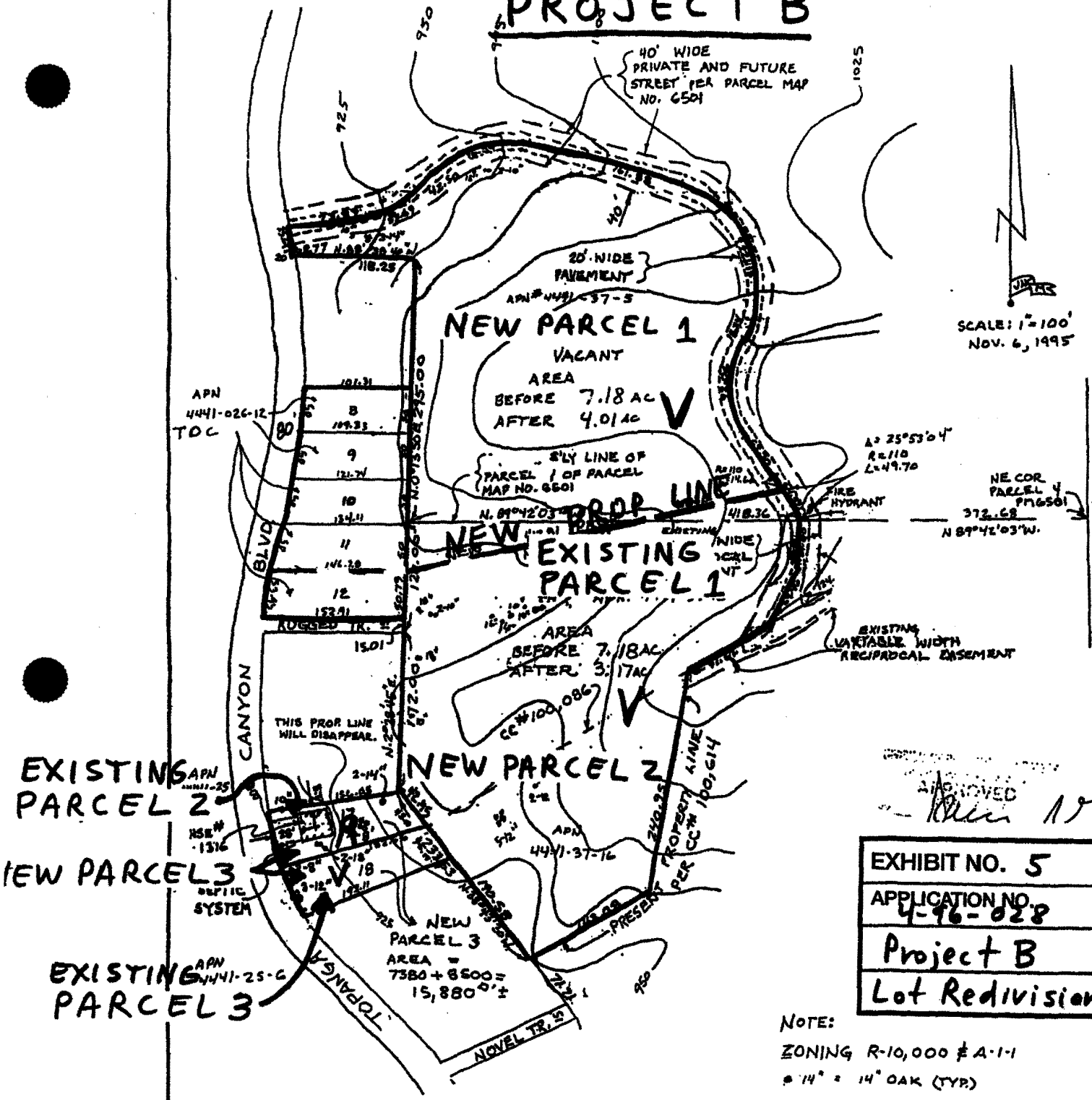


JOHN PACC NEIL
2930 N. TOPANGA CANY. BLVD
TOPANGA, CA. 90230
315-455-2013

VICINITY MAP
NOMAS BRO. D-2
SHOWN AS 107-D-2

TENTATIVE LOT LINE ADJUSTMENT MAP No. 4, 101, 701
 LOTS 17 & 18, TRACT NO. 6143 & PARCELS 1 & A PORTION OF
 PARCEL 4, PARCEL MAP No. 6501

PROJECT B

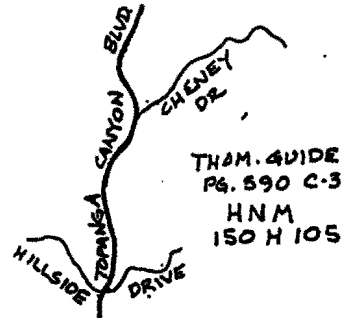


SCALE: 1" = 100'
 NOV. 6, 1995

EXHIBIT NO. 5
 APPLICATION NO. 4-96-028
 Project B
 Lot Redivision

NOTE:
 ZONING R-10,000 & A-1-1
 14" x 14" OAK (TYP)
 No OAK TREES WILL BE REMOVED BY THIS LOT LINE ADJ.
 START WITH 3 LOTS AND END WITH 3 LOTS.
 THIS MAP IS TO BE USED ONLY FOR THIS LOT LINE ADJUSTMENT

VICINITY MAP



JOHN H. MAC NEIL
 LICENSED LAND SURVEYOR NO. 5368
 2330 N. TOPANGA CANYON BLVD.
 TOPANGA, CA 90990
 810-466-2012

FILE # 7548

HISTORY

1981

GOTTLIEB SUBDIVIDES
PROPERTY INTO
4 PARCELS

PARCEL MAP #6501
Coastal Permit
P-4946

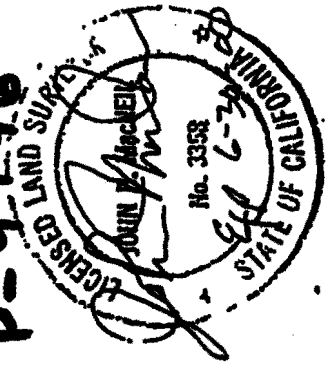
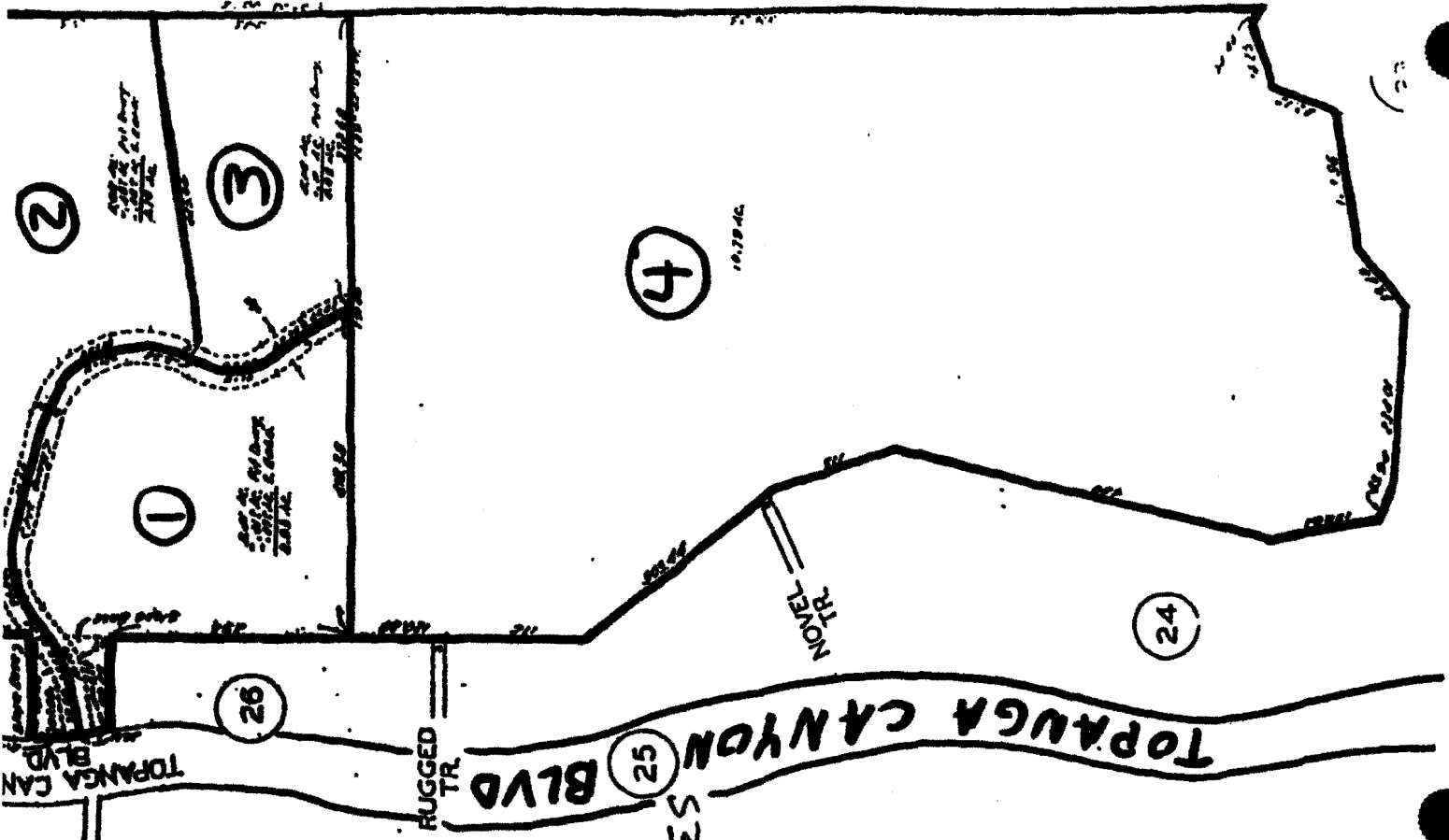
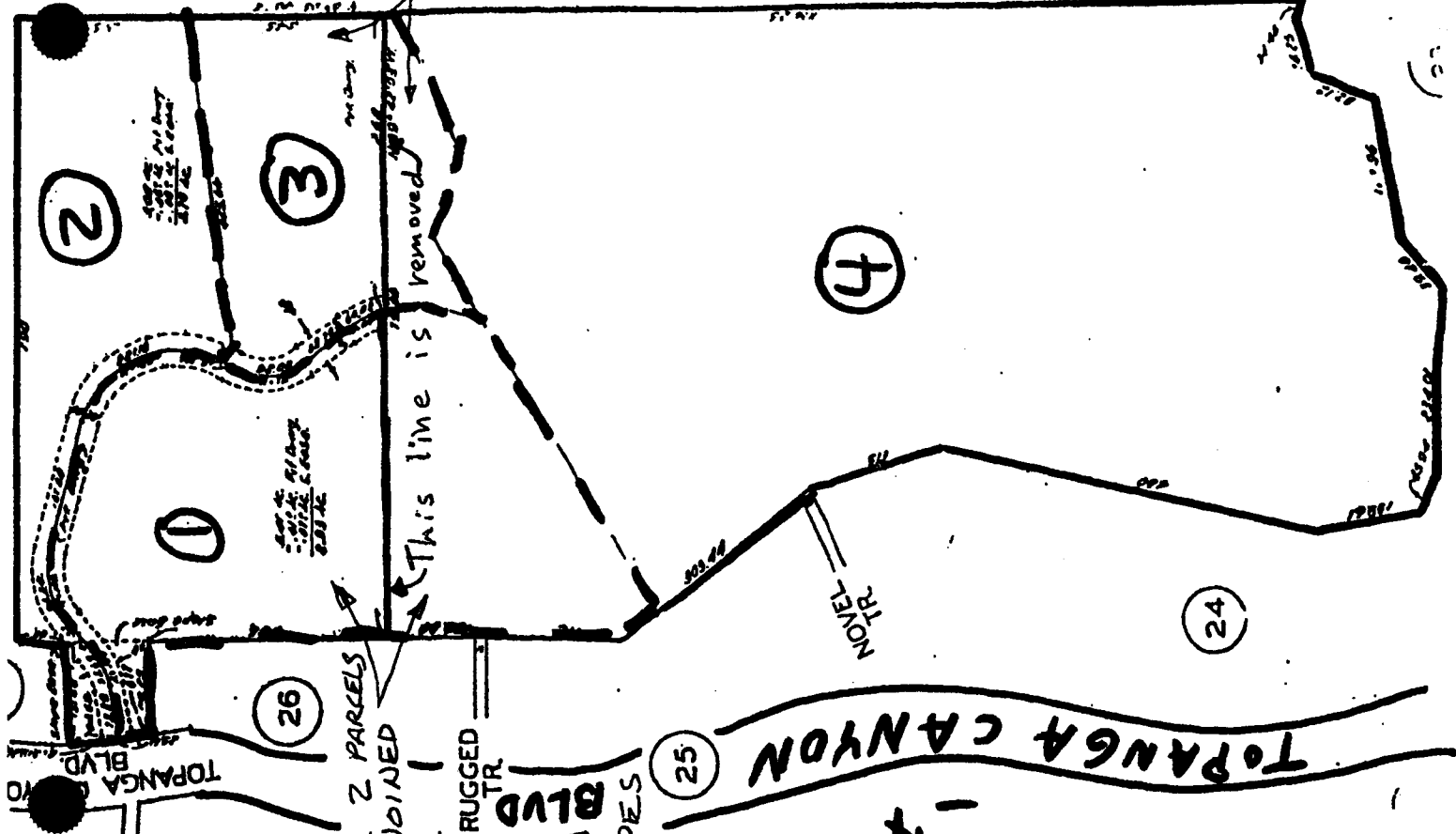


EXHIBIT NO. 6
APPLICATION NO. 4-96-028
1981 Recorded
Subdivision



441
LET - 20

1983



Certificate of Compliance
 # 83-380979
 STILL 4 PARCELS
 JUST DIFFERENT SHAPES

LOT LINE ADJ. # 1

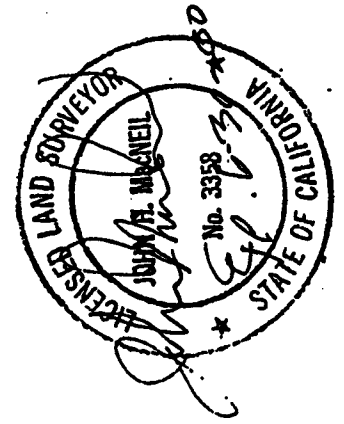
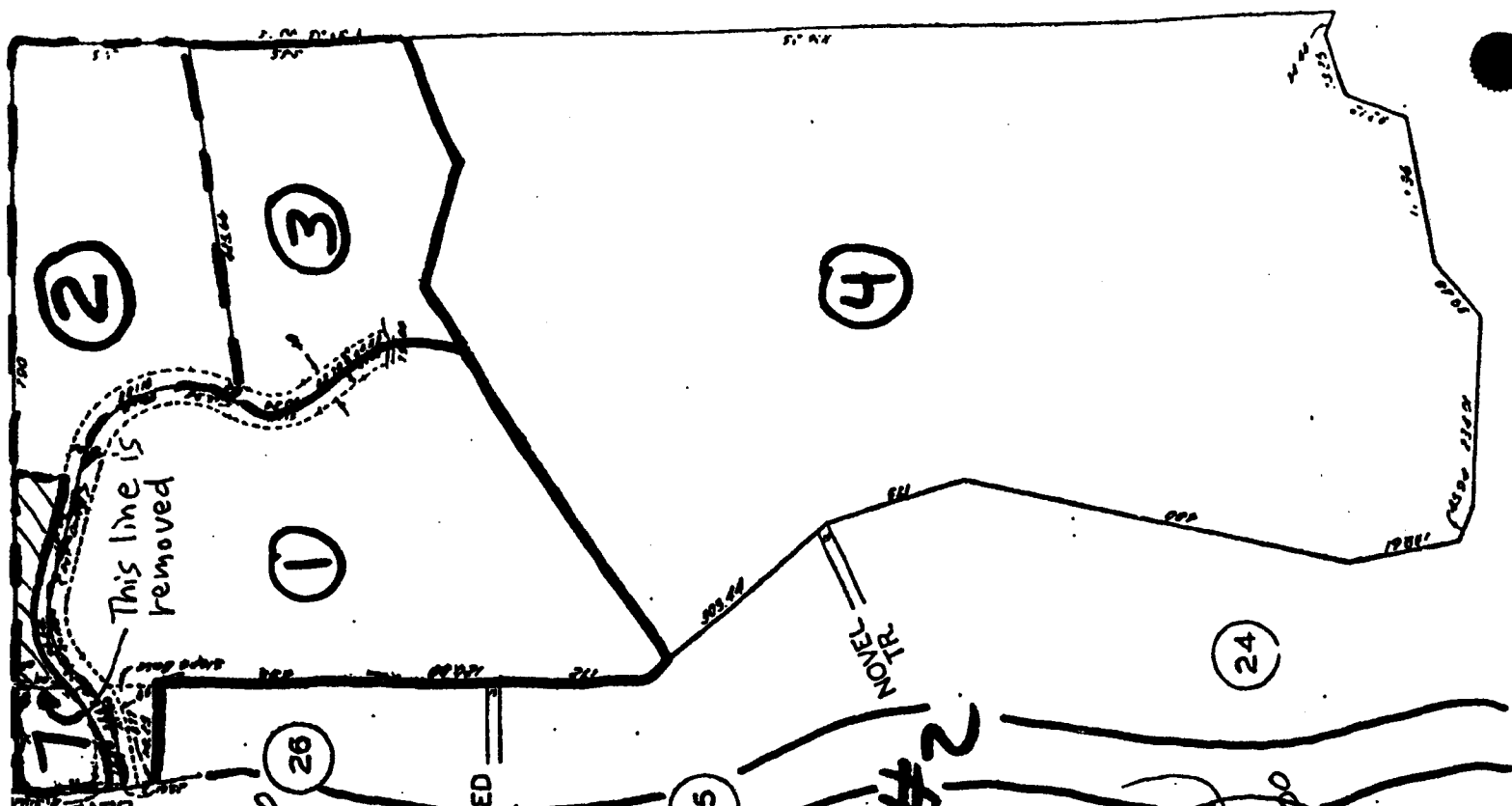


EXHIBIT NO. 7
APPLICATION NO. 9-96-28
Lot Line Adj
1983

(17)



BK 4440
KEELSON DR.

THIS PORTION ELIMINATED
& JOINED WITH LOT
2 OF OLD TRACT.

Certificate of Compliance
85-1265685

STILL 4 PARCELS
JUST DIFFERENT SHAPES

LOT LINE ADJ. #2

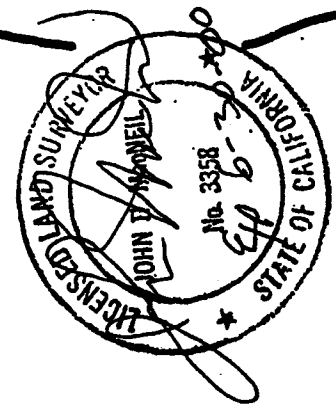


EXHIBIT NO. 8
APPLICATION NO. 4-96-28
Lot Line Adj.
1985

SCALE - 200'

1985

LOT LINE ADJ. #4

THESE 2 PARCELS ARE JOINED AS ONE PARCEL

THESE ARE JOINED

Certificate of Compliance # 83-1434632

STILL 4 PARCELS

START WITH 4 PARCELS IN 1981, END WITH 4 PARCELS IN 1995 JUST DIFFERENT SHAPES

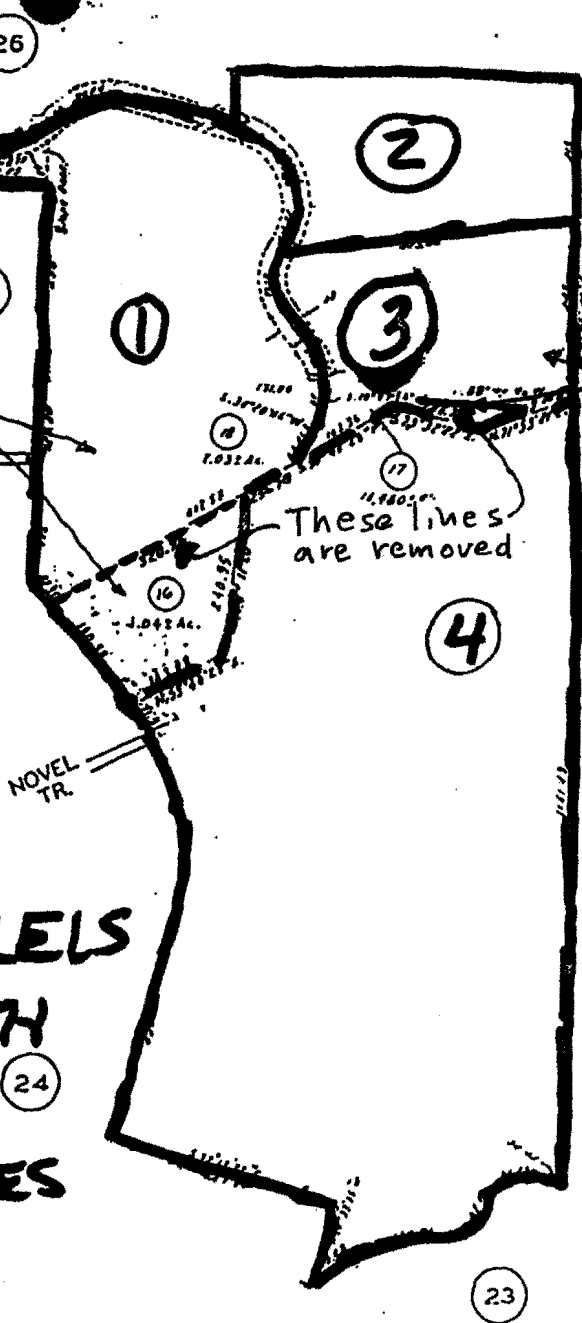
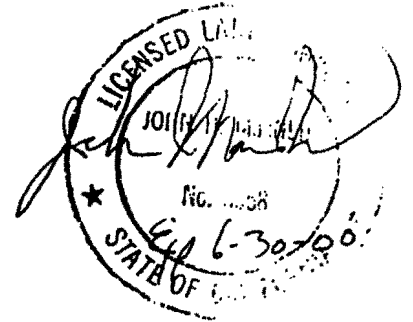


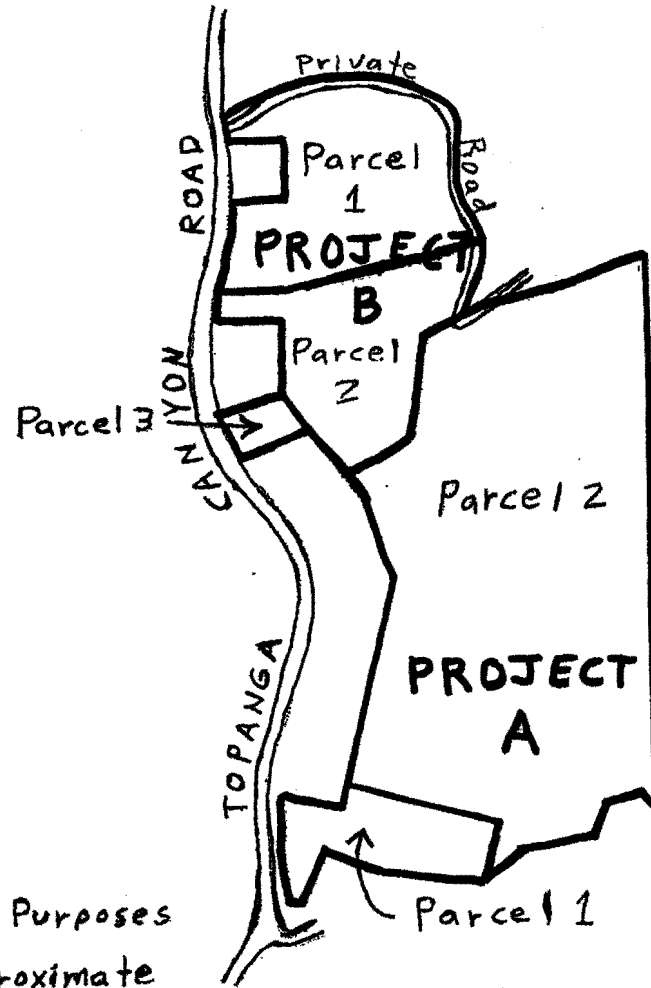
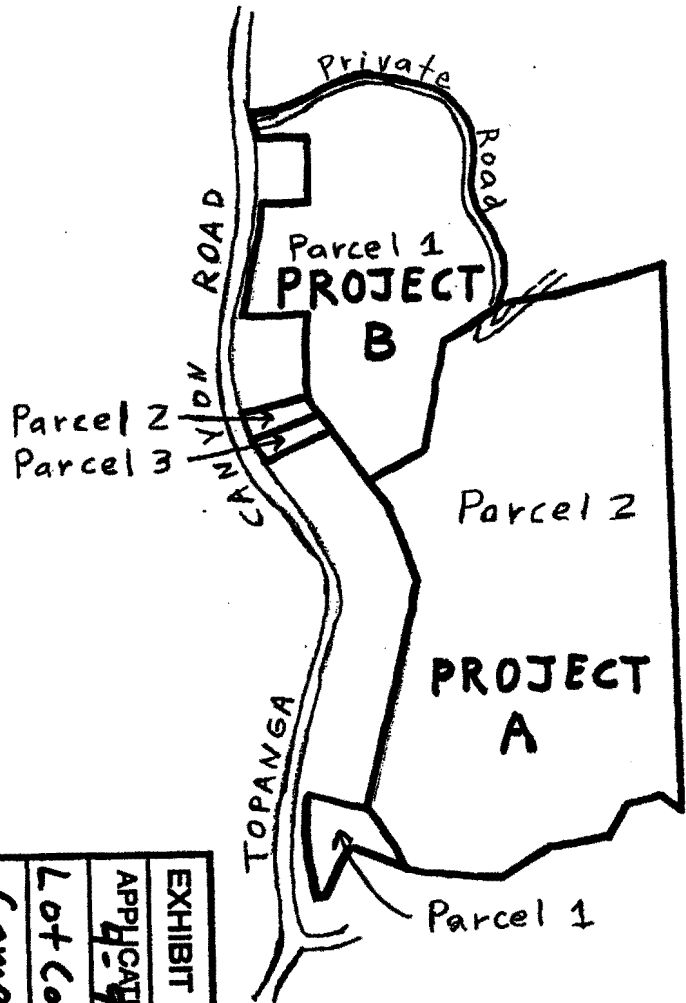
EXHIBIT NO. 9
APPLICATION NO. 4-916-28
Lot Line Adj. 1988



LOT CONFIGURATIONS

EXISTING

PROPOSED



For Illustration Purposes
 Lot Lines are Approximate
 No Scale

EXHIBIT NO. 10
APPLICATION NO. 46-28
Lot Configuration Comparison