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STATE OF CALIFORNIA -- THE RESOURCES AGENCY

CALIFORNIA COASTAL COMMISSION

SOUTH CENTRAL COAST AREA 29 SOUTH CALIFORNIA ST., SUITE 200 NTURA, CA 93001 805) 641 - 0142

RECORD PACKET COPY

4/9/99 5/28/99 10/6/99

Staff: J. Johnson A-Staff Report: 4/14/99 Hearing Date: 5/11 – 14/99 Commission Action:

Filed:

49th Day:

180th Day:

STAFF REPORT: REGULAR CALENDAR

APPLICATION NO.: 4-99-013

APPLICANT: Jess Platt & Mark Masi

PROJECT LOCATION: 3898 Rambla Orienta, Malibu (Los Angeles County)

PROJECT DESCRIPTION: Construct a two story single family residence (approximately 2,657 sq. ft.) and an attached two car garage (399 sq. ft.), with two additional off-street parking spaces, and septic system to replace residence destroyed in 1993 Malibu fire. Minor grading is proposed consisting of about 109 cubic yards of cut and 109 cubic yards of fill.

Lot area:	6,030 sq. ft.
Building coverage:	1,500 sq. ft.
Pavement coverage:	360 sq. ft.
Landscape coverage:	4,000 sq. ft.
Parking spaces:	4

LOCAL APPROVALS RECEIVED: City of Malibu, Planning Department, Approval in Concept, 1/12/99; Geology and Geotechnical Engineering, Approved in Concept, 5/18/98; Environmental Health, In-Concept Approval, July 7, 1998.

SUBSTANTIVE FILE DOCUMENTS: Malibu/Santa Monica Mountains Certified Land Use Plan; Preliminary Soils and Engineering-Geologic Investigation for Proposed Rebuild of Burned Out Residence, Geosystems, dated December 11, 1997 and Updated Investigation dated March 2, 1999; Coastal Development Permit No. 4-98-005, Weil/Cleveland; Coastal Development Permit No. 4-98-022, Weil/Cleveland; Coastal Development Permit No. 4-97-196, Burdge.

SUMMARY OF STAFF RECOMMENDATION

Staff recommends approval of the project with Special Conditions relating to: plans conforming to geologist and engineer recommendations, drainage and erosion control plan, landscape, irrigation and monitoring plan, and a wild fire waiver of liability, to bring the project into conformance with the Coastal Act. The project site is located about one seventh of a mile inland and north of Pacific Coast Highway and will be visible from the public Highway and shoreline. The site included a former residence burned during the 1993 Malibu firestorm.

GRAY DAVIS, Governor

STAFF RECOMMENDATION:

The staff recommends that the Commission adopt the following resolution:

I. Approval with Conditions

The Commission hereby <u>grants</u> a permit, subject to the conditions below, for the proposed development on the grounds that the development, as conditioned, 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 governments 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 effects on the environment within the meaning of the California Environmental Quality Act.

II. Standard Conditions

1. <u>Notice of Receipt and Acknowledgment</u>. 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. <u>Expiration</u>. 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. <u>Compliance</u>. 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. <u>Interpretation</u>. Any questions of intent or interpretation of any condition will be resolved by the Executive Director or the Commission.

5. <u>Inspections</u>. The Commission staff shall be allowed to inspect the site and the development during construction, subject to 24-hour advance notice.

6. <u>Assignment</u>. 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. <u>Terms and Conditions Run with the Land</u>. 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. Plans Conforming to Geologist and Engineer Recommendations

PRIOR TO THE ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicant shall submit, for review and approval by the Executive Director, evidence of the geologist and geotechnical engineer consultants review and approval of all project plans. All recommendations contained in the submitted geologic report titled: Preliminary Soils and Engineering-Geologic Investigation for Proposed Rebuild of Burned Out Residence, dated December 11, 1997 and Updated Investigation dated March 2, 1999 and completed by Geosystems, including issues related to <u>site</u> preparation, foundation and building setback, foundations, lateral design, expansion index, temporary excavation slopes, foundation settlement, retaining wall, floor slabs, drainage protection, and private sewage disposal system, shall be incorporated into all final design and construction project plans. All plans must be reviewed and approved by the consultants.

The final plans approved by the consultants shall be in substantial conformance with the plans approved by the Commission relative to construction, grading and drainage. Any substantial changes in the proposed development approved by the Commission which may be required by the consultants shall require an amendment to the permit or a new coastal permit.

2. Drainage and Erosion Control Plan

PRIOR TO THE ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicant shall submit for the review and approval of the Executive Director, a run-off and erosion control plan designed by a licensed engineer which assures that run-off from the roof, patios, and all other impervious surfaces on the subject parcel are collected and discharged in a manner which avoids ponding on the pad area and erosion on the site. The drainage and erosion control plan shall be implemented within 30 days of the applicant's receipt of the City of Malibu's issuance of the certificate of occupancy. By acceptance of this permit, the applicant agrees to maintain the drainage devices on a yearly basis in order to insure that the system functions properly. Should the devices fail or any erosion result from drainage from the project, the applicant or successor interests shall be responsible for any necessary repairs and restoration.

3. Landscape, Irrigation and Monitoring Plan

A. PRIOR TO THE ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicant shall submit for the review and approval of the Executive Director, a revised landscaping and irrigation plan designed by a licensed landscape architect. The landscape plans shall incorporate the following criteria:

- (1) Landscape Plan Criteria All disturbed areas on the subject site, including the slope below the residence shall be planted and maintained for erosion control and visual enhancement purposes according the submitted landscape plan within ninety (90) days of the applicant's receipt of the Certificate of Occupancy from the City of Malibu. Such planting shall be adequate to provide ninety (90) percent coverage within two (2) years and shall be repeated, if necessary to provide such coverage. To minimize the need for irrigation and to screen or soften the visual impact of development all landscaping shall consist primarily of native, drought resistant plants as listed by the California Native Plant Society, Santa Monica Mountains Chapter, in their document entitled Recommended List of Native Plants for Landscaping in the Santa Monica Mountains, dated October 4, 1994. Invasive, non-indigenous plant species which tend to supplant native species shall not be used. The plan shall include vertical elements, such as trees and shrubs, which partially screen the appearance of the proposed structure as viewed from Pacific Coast Highway located to the south. The plan shall specify the erosion control measures to be implemented and the materials necessary to accomplish short-term stabilization as needed on the site.
- (2) <u>Sediment Basins</u> Should grading take place during the rainy season (November 1 - March 31), sediment basins (including debris basins, desilting basins, or silt traps) shall be required on the project site prior to or concurrent with the initial grading operations and maintained through the development process to minimize sediment from runoff waters during construction. All sediment should be retained on-site unless removed to an appropriate disposal site located outside the coastal zone or to a disposal site located within the coastal zone with an approved coastal permit.
- B. Monitoring Plan
 - (1) Five years from the date of the applicants' receipt of the Certificate of Occupancy for the residence, the applicant shall submit, for the review and approval of the Executive Director, a landscape monitoring report, prepared by a licensed Landscape Architect or qualified Resource Specialist, that certifies the on-site landscaping is in conformance with the landscape plan approved pursuant to this Special Condition. The monitoring report shall include photographic documentation of plant species and plant coverage.
 - (2) If the landscape monitoring report indicates the landscaping is not in conformance with or has failed to meet the performance standards specified in the landscaping plan approved pursuant to this permit, the applicant, or successors in interest, shall submit a revised or supplemental landscape plan for the review and approval of the Executive Director. The revised landscaping plan must be prepared by a licensed Landscape Architect or a

qualified Resource Specialist and shall specify measures to remediate those portions of the original plan that have failed or are not in conformance with the original approved plan.

4. Wild Fire Waiver of Liability

PRIOR TO THE ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicant shall submit a signed document which shall indemnify and hold harmless the California Coastal Commission, its officers, agents and employees against any and all claims, demands, damages, costs, expenses of liability arising out of the acquisition, design, construction, operation, maintenance, existence, or failure of the permitted project in an area where an extraordinary potential for damage or destruction from wild fire exists as an inherent risk to life and property

IV. Findings and Declarations

The Commission hereby finds and declares:

A. Project Description and Background

The subject site is located in a built-out section of the La Costa district of Malibu. The neighboring properties to the north across Rambla Orienta and to the south are established residences, although numerous homes within the immediate neighborhood have been recently reconstructed. The lots adjacent to the east and west and many nearby lots are vacant with burned out former residences. The subject building site is located at an elevation of about 220' above sea level and approximately one seventh of a mile from Pacific Coast Fighway. (Exhibits 1 - 3)

The applicants propose to construct an approximate 2,657 sq. ft., 25 1/4 foot high, twostory single family residence with a 399 sq. ft. attached two car garage and two additional off-street parking spaces. The total size of the residence and garage is 3,056 sq. ft. A new septic system incorporating the existing seepage pit will be constructed to serve the residence. Minor grading is proposed consisting of 109 cubic yards of cut (excavations and site recompaction) and 109 cubic yards of fill. The majority of the fill is to be placed and compacted between the existing retaining wall and the proposed residence which is located within the front yard along Rambla Orienta. (Exhibits 3 - 7)

The proposed project wil replace a 1,808 sq. ft. single family residence destroyed in the 1993 Malibu Firestorm. Pursuant to P.R.C. Section 30610(g)(1) no Coastal Permit is required for the replacement of a structure destroyed by disaster, if the structure(s) does not exceed either floor area, height, or bulk of the destroyed structure by 10%. In this case, the proposed replacement structure square footage exceeds the previous residence by 69%, and therefore a Coastal Permit is required.

Although the site and proposed development will be visible from Pacific Coast Highway and the shoreline, there are no public trails or parks within sight of the proposed residence. There are no designated environmentally sensitive habitat areas on or near the subject site.

B. Geologic Stability and Hazards

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, 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.

The proposed development is located in the Santa Monica Mountains, an area that is generally considered to be subject to an unusually high amount of natural hazards. Geologic hazards common to the Santa Monica Mountains include landslides, erosion, and flooding. In addition fire is an inherent threat to the indigenous chaparral community of the coastal mountains. Wild fires often denude hillsides in the Santa Monica Mountains of all existing vegetation thereby contributing to an increased potential for erosion and landslides on property.

Section 30253 of the Ccastal Act mandates that new development provide for geologic stability and integrity and minimize risks to life and property in areas of high geologic, flood, and fire hazard. In addition to Section 30253 of the Coastal Act, the certified Malibu/Santa Monica Mountains Land Use Plan (LUP) includes several policies and standards regarding hazards and geologic stability. These policies have been certified as consistent with the Coastal Act and used as guidance by the Commission in numerous past permit actions in evaluating a project's consistency with Section 30253 of the Coastal Act. For example, Policy 144 of the LUP, suggests that the Commission continue to provide information concerning hazards and appropriate means of minimizing the harmful effects of natural disasters on persons and property.

1. Geology

The applicant has submitted a Preliminary Soils and Engineering-Geologic Investigation Report, dated December 11, 1997, prepared by Geosystems for the subject site. An Update to this report dated March 2, 1999 by Geosystems was also submitted by the applicants. The City of Malibu "Approved in Concept" in the planning stage after their review of this report which is noted on the Geology and Geotechnical Engine ring Review Sheet, dated 5/18/98.

The subject site is on a south facing slope of between about $2\frac{1}{2}$: 1 to $1\frac{1}{2}$: 1 slope on the southern flanks of the Santa Monica Mountains. The slope is located within an

area of stable bedrock between the Calle del Barco and the Rambla Pacifico Landslides according to the applicant's report. The Calle del Barco Landslide located about 500 feet to the northwest has been partially stabilized. The Rambla Pacifico Landslide located about 350 feet to the northeast is currently dormant but considered unstable. The site is not located in an area that would be adversely effected by future instability or movement of these landslides.

The building site consists of a level building pad notched into the south-facing slope approximately 10 feet below the street level of Rambla Orienta (Exhibit 3). The building pad is formed by an approximate 10 foot retaining wall adjacent to the street and an approximate 4 foot retaining wall along the down slope side of the pad. Although both of these retaining walls are intended to remain on site, they will be reviewed by the structural engineer to provide any necessary repair or replacement to conform with the recommendations for the foundation and retaining wall design, as part of this application. The new residence will be structurally separate from the existing retaining walls.

The foundation for the prior burned out residence has been mostly removed from the area of the proposed residence to allow the firm terrace deposits to be exposed in the remaining excavations. The site consists of minor amounts of fill material that is proposed to be removed on the southern portion of the building pad. Most of the site includes Terrace Deposits on a horizontal contact with underlying bedrock of the Calabasas Formation.

In reviewing the subject site, the applicant's engineer and geologist consultants reviewed engineering geologic factors including the bedding plane orientation, joints and fractures, excavations characteristics, landslides, and groundwater. These consultants determined that ancient or recent landslides were not observed on the property and the site is not located within the areas affected by the nearby Calle del Barco and Rambla Pacifico landslides, located 500 feet to the northwest and 350 feet to the northwest, respectively. In conclusion, the geology report states that:

"It is the finding of this firm that the proposed building and or grading will be safe and that the site will not be affected by any hazard from landslide, settlement or slippage and the completed work will not adverse affect adjacent property in compliance with the City code, provided our recommendations are followed."

This report and the update report developed a set of recommendations based on their analysis to minimize the risk of geologic hazards for the following issues: site preparation, foundation and building setback, foundations, lateral design, expansion index, temporary excavation slopes, foundation settlement, retaining wall, floor slabs, drainage protection, and private sewage disposal system.

Based on the findings and recommendations of the consulting geologist and engineer, the Commission finds that the development is consistent with Section 30253 of the Coastal Act so long as all the consultant's recommendations regarding the proposed

development are incorporated into the project plans. Therefore, the Commission finds it necessary to require the applicant to submit project plans that have been certified in writing by the consulting geologist and geotechnical engineer as conforming to their recommendations, as noted in special condition number one (1) for the final project plans for the proposed project.

2. Erosion

The subject building site is located on a south-facing slope that ascends from the Pacific Ocean to an elevation of approximately 220 feet above sea level. Physical relief on the site is on the order of about forty (40) feet. Slope gradients vary from nearly horizontal at the building site to as steep as 2.5:1. Slope drainage is by sheet flow runoff directed toward the south across the existing contours. The applicants propose to conceptually direct roof runoff through rain gutters to the street, while street drainage is controlled via curb and gutter to storm drains.

A properly designed drainage system to convey runoff offsite in a controlled manner will minimize erosion and enhance site stability. The applicant's consulting geologist and engineer recommend that all pad and roof drainage should be collected and transferred to an approved location in non-erosive drainage devices. Therefore, given the potential for uncontrolled run-off to contribute towards soil erosion and possibly larger instability problems, the Commission finds it necessary to require drainage and erosion control plans as recommended by the applicants consultants as noted in special condition number two (2). This condition requires the drainage and erosion control plan to be completed by a licensed engineer.

In addition, the slope areas of the subject lot seaward of the residence should be planted according to a landscape and irrigation plan with drought tolerant, deep rooted, erosion retardant ground cover, to be selected in consultation with a landscape architect to reduce the potential for future erosion and soil slippage along The applicants have submitted a conceptual landscape plan which the slope. indicates a number of non-native species. The applicant needs to submit a revised landscape and irrigation plan that includes primarily native drought resistant plant species. The revised plan needs to be designed to minimize and control erosion, as well as screen and soften the visual impact of the structure from the south. A monitoring plan is needed to ensure that the landscaping meets the approved landscaping and irrigation plan after a five year time period from the time of occupancy of the residence. In addition, in the event the proposed grading occurs during the rainy season (November 1 - March 31) sediment basins need to be installed on the project site prior to or concurrent with grading operations and maintained through the development process to minimize sediment from runoff waters Therefore, the Commission finds it necessary to require a during construction. revised landscape and irrigation plan with sediment basins and a monitoring plan to further minimize and control erosion as noted in special condition number three (3).

3. <u>Fire</u>

The Coastal Act also requires that new development minimize the risk to life and property in areas of high fire hazard. The Coastal Act recognizes that new development may involve the taking of some risk. Coastal Act policies require the Commission to establish the appropriate degree of risk acceptable for the proposed development and to establish who should assume the risk. When development in areas of identified hazards is proposed, the Commission considers the hazard associated with the project site and the potential cost to the public, as well as the individual's right to use his property.

Vegetation in the coastal areas of the Santa Monica Mountains consists mostly of coastal sage scrub and chaparral. Many plant species common to these communities produce and store terpenes, which are highly flammable substances (Mooney in Barbour, <u>Terrestrial Vegetation of California</u>, 1988). Chaparral and sage scrub communities have evolved in concert with, and continue to produce the potential for frequent wild fires. The typical warm, dry summer conditions of the Mediterranean climate combine with the natural characteristics of the native vegetation to pose a risk of wild fire damage to development that cannot be completely avoided or mitigated.

Due to the fact that the proposed project is located in an area subject to an extraordinary potential for damage or destruction from wild fire, the Commission can only approve the project if the applicant assumes the liability from these associated risks. Through the fire waiver of liability, the applicant acknowledges and appreciates the nature of the fire hazard which exists on the site and which may affect the safety of the proposed development, as incorporated by special condition number four (4).

The Commission finds that only as conditioned above is the proposed project consistent with Section 30253 of the Coastal Act.

C. Scenic and Visual Impacts

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.

The site is surrounded by either existing reconstructed residences or vacant burned out lots; the result of residences burned due to the 1993 Malibu fire. This area is characterized by moderate intensity hillside residential development.

Regarding public roadways, the project site is located at about the 220 foot elevation level above the sea which is about 210 feet above the roadway elevation of Pacific Coast Highway which is located due south of the subject site. Because Pacific Coast Highway is located about one seventh (1/7) of a mile south of the site, the project site will be clearly visible from the Highway. The Malibu/Santa Monica Mountains Land Use Plan designates this section of the Highway as a second priority scenic segment (See Exhibit 7 for the south elevation of the residence). In addition, because the location of the proposed residence is about one seventh (1/7) of a mile north of Pacific Coast Highway, the size and appearance of the residence will be visible as viewed by the public from the Highway.

Regarding public lands and trails, the proposed project site will not be visible from public lands or trails, except for the public beach and ocean to the south.

Visual impacts can be mitigated by requiring the slope area seaward of the residence to be adequately landscaped. The landscaping should consist of native, drought resistant plants and be designed to minimize and control erosion, as well as, partially screen and soften the visual impact of the structure from the south with vertical elements such as trees and shrubs. Therefore, special condition number three (3) requires the applicants to submit a landscape and irrigation plan with a sediment basin and monitoring plan meeting the above requirements to minimize the visual impacts and to minimize erosion, as a result of the proposed project. A monitoring plan is needed to ensure that the landscaping meets the approved landscaping and irrigation plan after a five year time period from the time of occupancy of the residence. The Commission finds that the proposed project, as conditioned, is consistent with Section 30251 of the Coastal Act.

D. Septic System

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. The Coastal Act includes policies to provide for adequate infrastructure including waste disposal 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.

Section 30250(a) of the Coastal Act states in part that:

New residential, ... development, ... shall be located within, ... existing developed areas able to accommodate it ... and where it will not have significant adverse effects, either individually or cumulatively, on coastal resources.

The proposed development includes constructing a septic system for the new residence to provide for adequate sewage disposal. The applicants propose to construct a new septic tank and connect it to an existing seepage pit. The existing septic tank will be abandoned or removed. The applicants have also submitted a conceptual approval for the sewage disposal system from the Department of Environmental Health Services, City of Malibu, dated July 7, 1998. This approval indicates that the sewage disposal system for the project in this application complies with all minimum requirements of the City of Malibu Plumbing Code.

The Commission has found in past permit actions that compliance with the health and safety codes will minimize any potential for waste water discharge that could adversely impact coastal waters. Therefore, the Commission finds that the proposed septic system is consistent with Sections 30231 and 30250 of the Coastal Act.

E. Local Coastal Program

Section 30604(a) of the Coastal Act states that:

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 the provisions of Chapter 3 (commencing with Section 30200) of this division and that the permitted development will not prejudice the ability of the local government to prepare a local program that is in conformity with the provisions of 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 if certain conditions are incorporated into the project and accepted by the applicant. As conditioned, the proposed development will not create adverse effects and is found to be consistent with the applicable policies contained in Chapter 3.

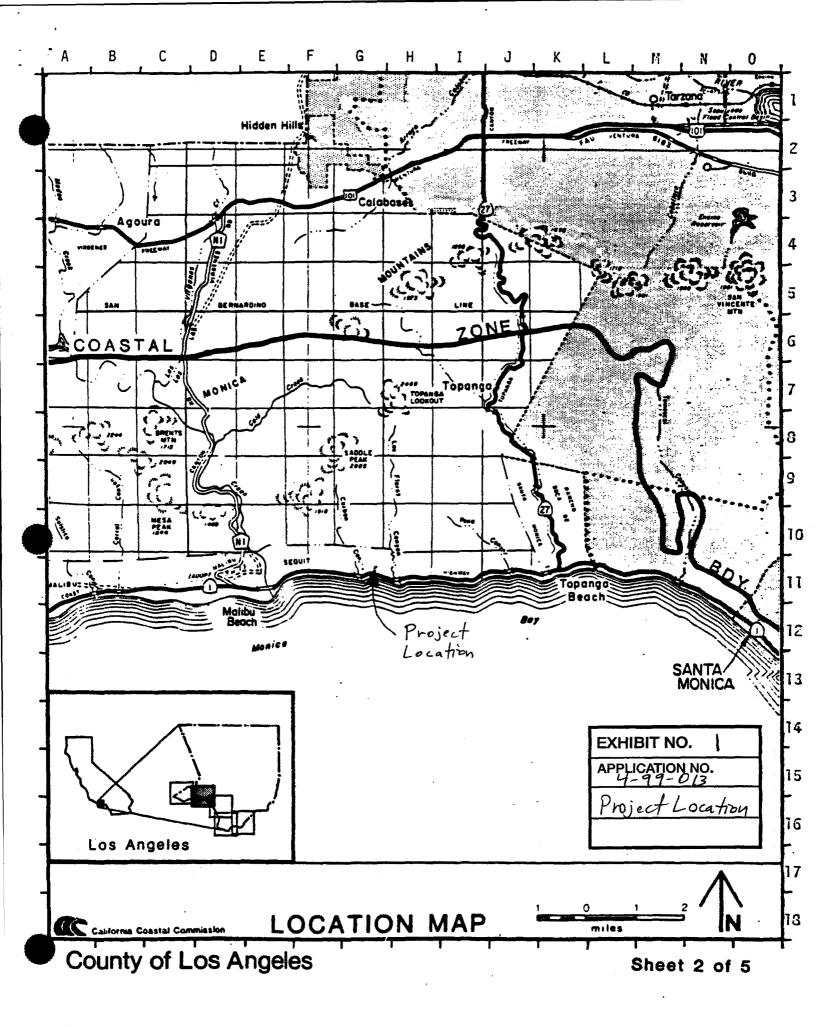
Therefore, the Commission finds that approval of the proposed development, as conditioned, will not prejudice the City's ability to prepare a Local Coastal Program for Malibu that is also consistent with the policies of Chapter 3 of the Coastal Act as required by Section 30604(a).

F. 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, as conditioned by any conditions of approval, to be consistent with any applicable requirements of the California Environmental Quality Act (CEQA). Section 21080.5(d)(2)(A) 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 effects that the activity would have on the environment.

The proposed development, as conditioned, would not have significant, adverse effects on the environment, within the meaning of the California Environmental Quality Act of 1970. Therefore, the Commission finds that the proposed project, as conditioned to mitigate the identified effects, is consistent with the requirements of CEQA and the policies of the Coastal Act.

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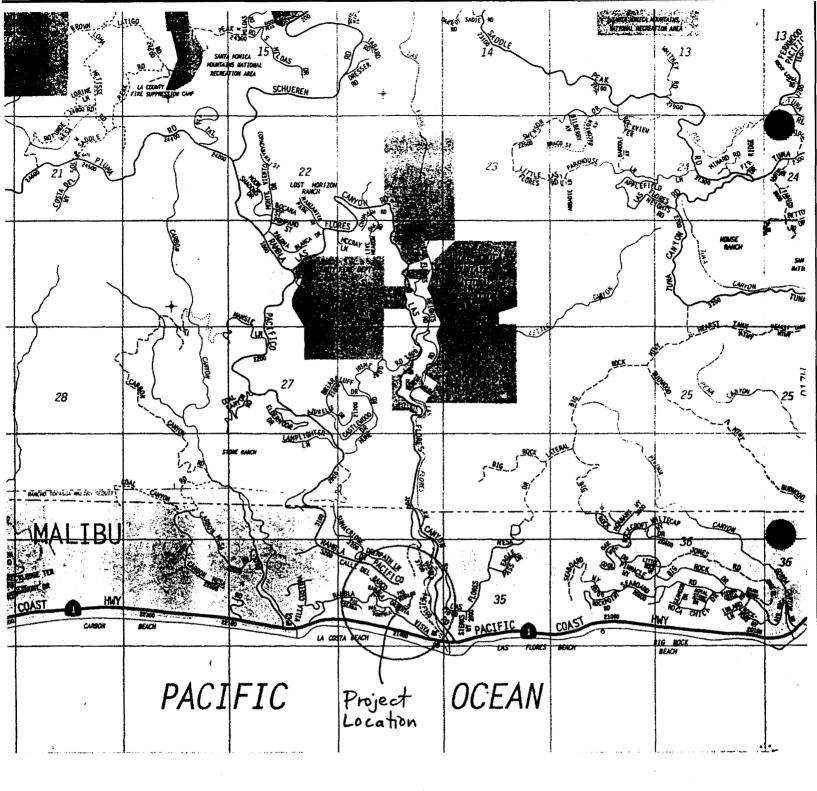
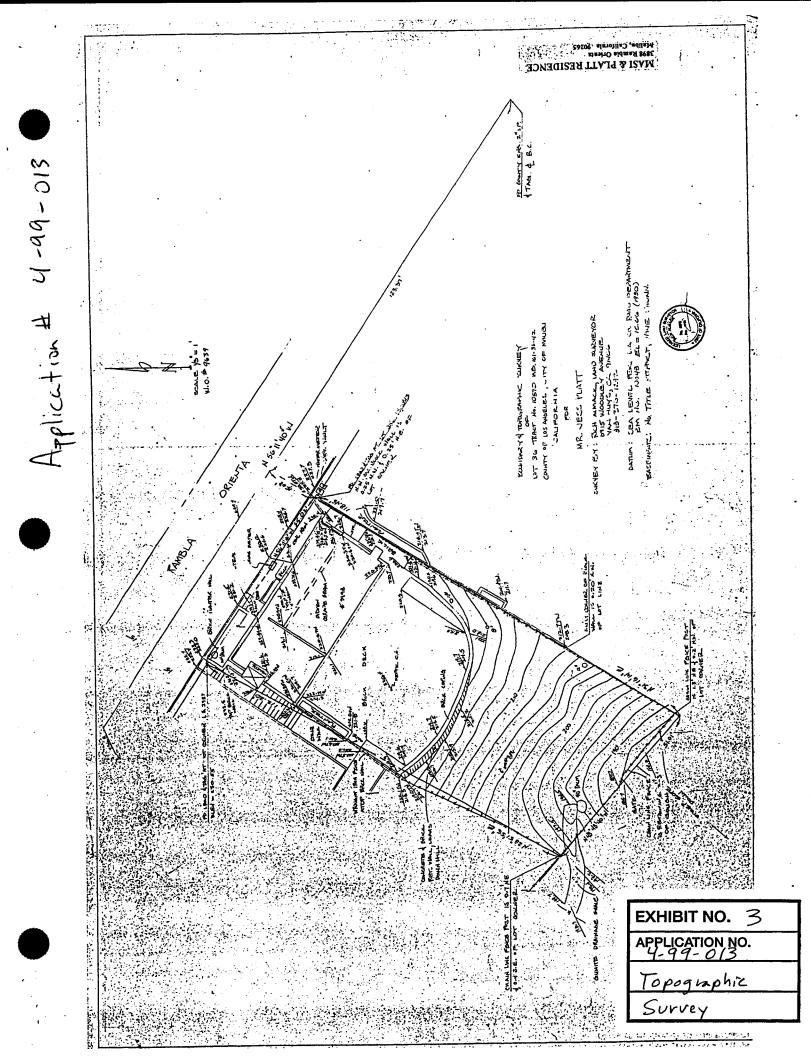
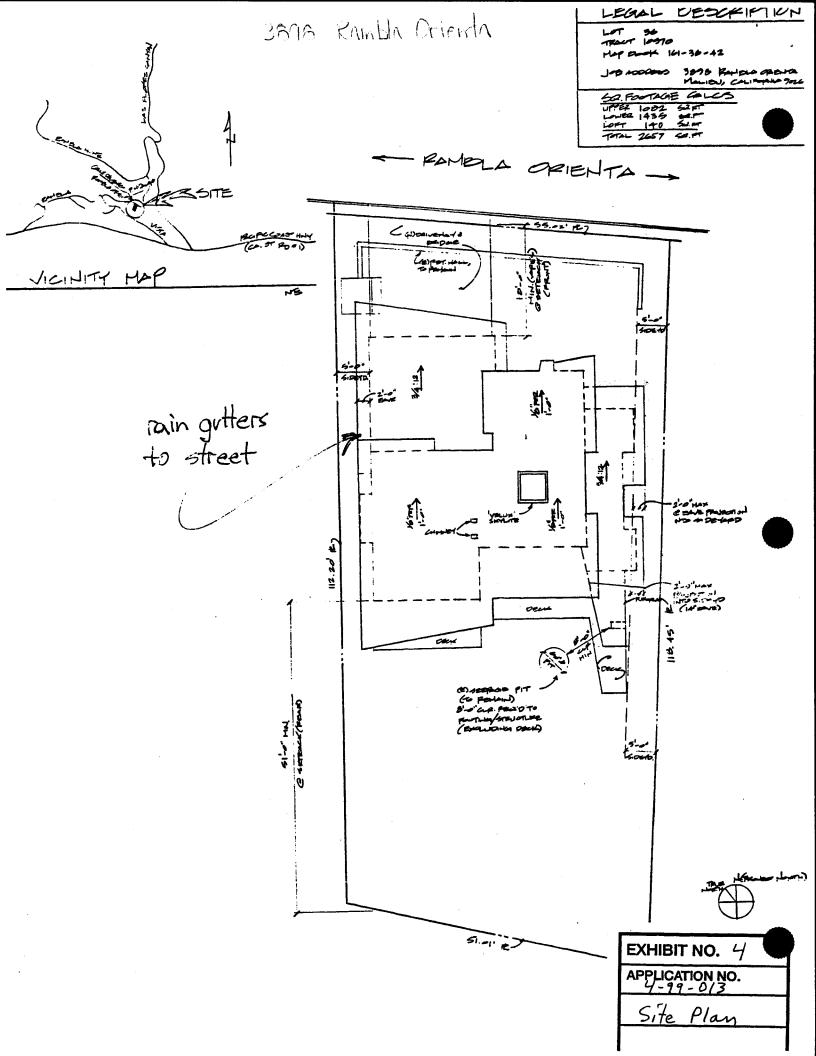
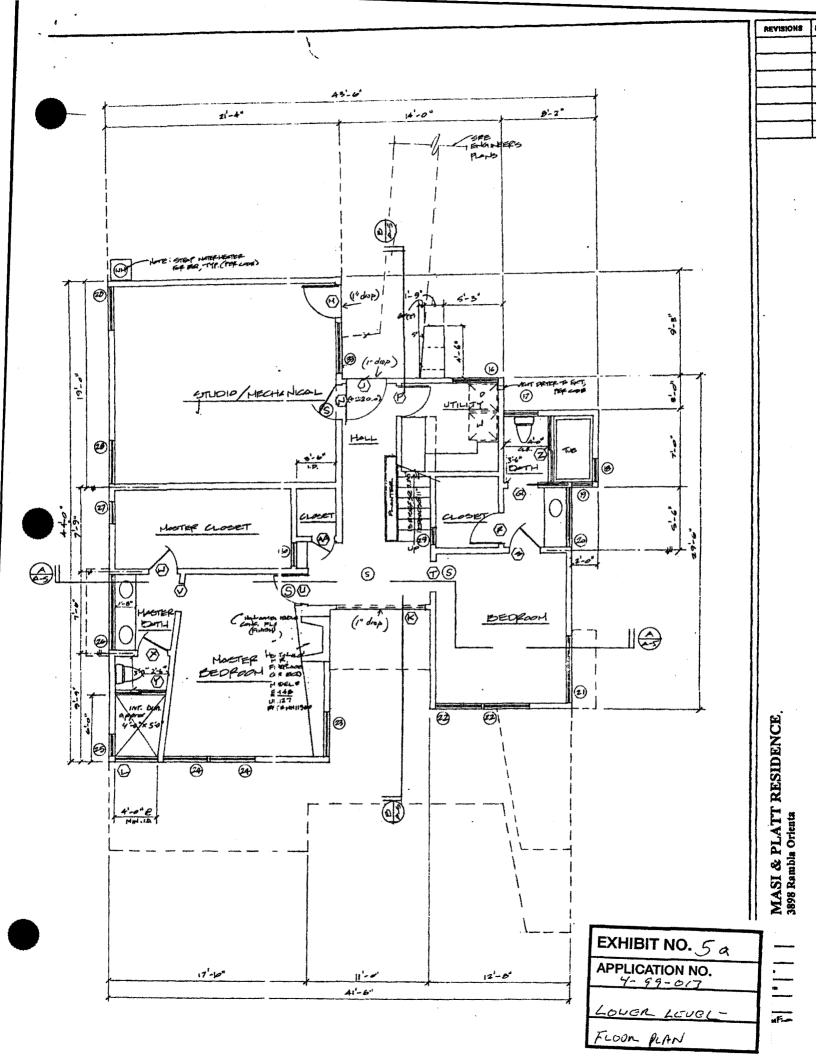
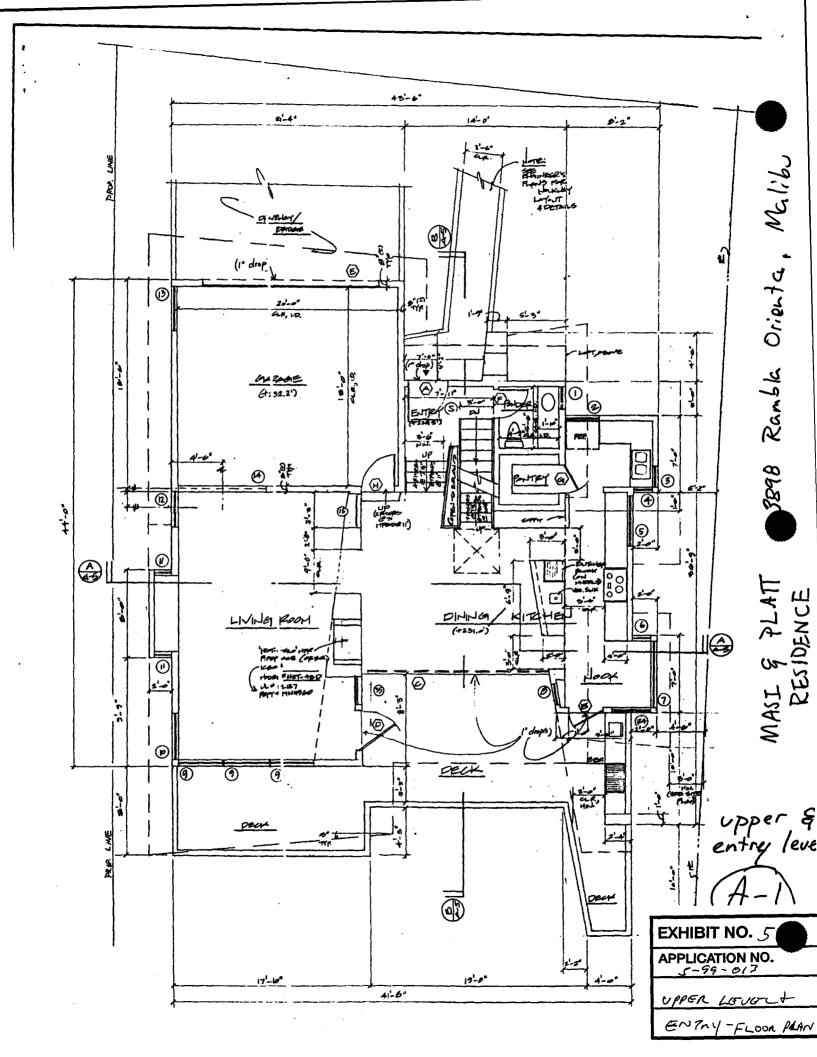


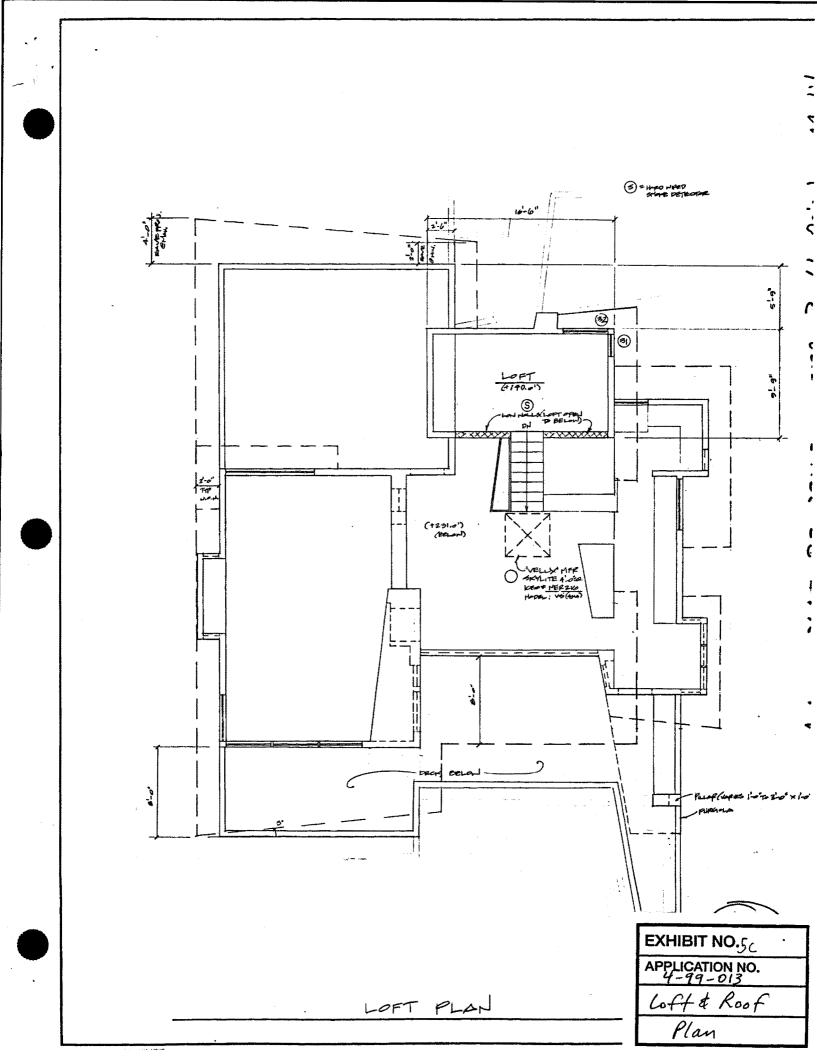
EXHIBIT NO. 2
APPLICATION NO. 4-99-013
Project Location

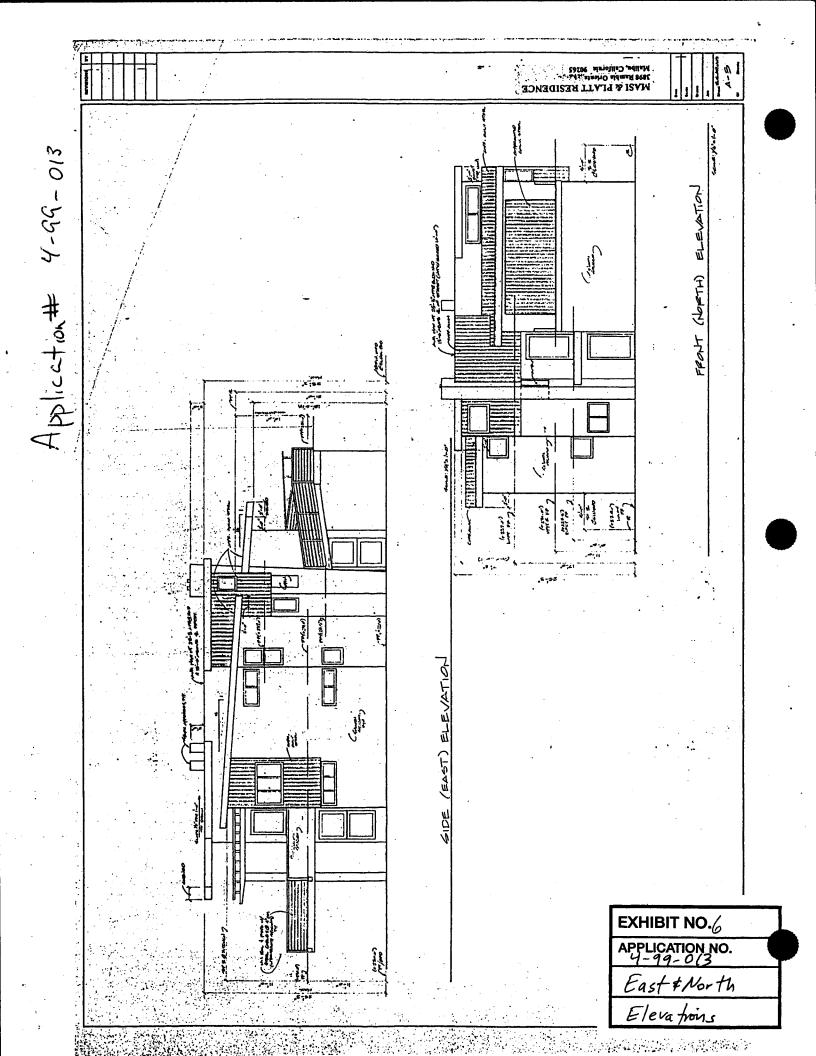


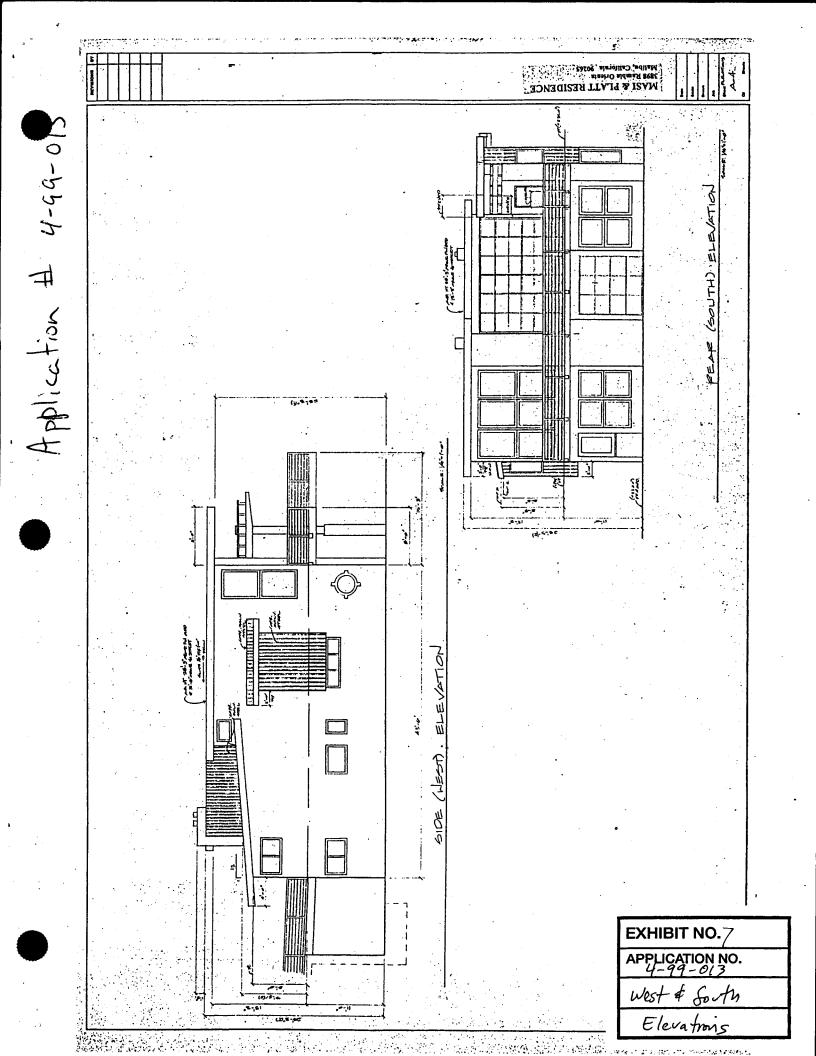












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