

CALIFORNIA COASTAL COMMISSION

1000 SOUTH CENTRAL COAST AREA
1000 SOUTH CALIFORNIA ST., SUITE 200
VENTURA, CA 93001
(805) 641-0142

Filed: 7/13/01
49th Day: 8/31/01
180th Day: 1/9/02
Staff: SLG-VJA
Staff Report: 10/23/01
Hearing Date: 11/16/01
Commission Action:



RECORD PACKET COPY

STAFF REPORT: REGULAR CALENDAR

APPLICATION No. 4-01-034

APPLICANT: B.A.S.E. 22, LLC

AGENT: Goldman and Firth Architects

PROJECT LOCATION: 32640 Pacific Coast Highway, Malibu (Los Angeles County)

PROJECT DESCRIPTION: Construct new two-story, 28 ft. high, 8,129 sq. ft. single family residence with 675 sq. ft. attached garage, 660 sq. ft. basement, 202 sq. ft. sunset pavilion, swimming pool, spa, driveway, retaining walls, septic system, and 2,192 cu. yds. of grading (1665 cu.yds cut, 8.2 cu. yds fill, 518.5 cu. yds. overexcavation).

Lot Area:	127,208 sq. ft. (2.92 acres)
Building Coverage:	6,079 sq. ft.
Pavement Coverage:	6,511 sq. ft.
Landscaped Area:	32,000 sq. ft.
Parking Spaces:	5
Height above existing grade:	28 feet

LOCAL APPROVALS RECEIVED: ; County of Los Angeles, Fire Department, Approval in Concept, 2/8/01; City of Malibu, Planning Department, Approval in Concept, 1/12/01; City of Malibu, Geology and Geotechnical Approval in Concept, 9/26/00; City of Malibu, Environmental Health Approval in Concept, 7/20/00; County of Los Angeles, Fire Department, Preliminary Fuel Modification Plan Approval, 5/31/00.

SUBSTANTIVE FILE DOCUMENTS: Supplemental Letter: 75 year setback Line, 32640 Pacific Coast Highway (SubSurface Designs, Inc. 7/10/01); Addendum III: Response to City of Malibu Review Sheet, 32640 Pacific Coast Highway (SubSurface Designs, Inc. 9/7/00); Addendum II: Response to City of Malibu Review Sheet, 32640 Pacific Coast Highway (SubSurface Designs, Inc. 8/16/00); Addendum I: Response to City of Malibu Review Sheet (SubSurface Designs, Inc. 6/29/00); Geologic and Soils Engineering Investigation (SubSurface Designs, Inc., 3/23/00); Phase I Archaeological Study (Wlodarski, December 1999); Coastal Development Permits (CDPs) 4-98-142, 143, & 163 (Duggan & Levinson), CDP 4-97-031 (Anvil), CDP 5-90-020 (Young), CDP 4-99-169 (Trento).

SUMMARY OF STAFF RECOMMENDATION: Staff recommends **denial** of the proposed project for three reasons: 1) the project as proposed is inconsistent with the

policies of Chapter 3 of the Coastal Act – specifically policy 30251; 2) approval of the proposed project would prejudice the City's ability to prepare a Local Coastal Program (LCP) that is certifiable by the Commission; and 3) feasible alternatives exist which would lessen or avoid the adverse impacts to coastal resources posed by the project, but which the applicant has not proposed.

I. STAFF RECOMMENDATION

MOTION: *I move that the Commission approve Coastal Development Permit No. 4-01-034 for the development proposed by the applicant.*

STAFF RECOMMENDATION OF DENIAL:

Staff recommends a **NO** vote. Failure of this motion will result in denial of the permit and adoption of the following resolution and findings. The motion passes only by affirmative vote of a majority of the Commissioners present.

RESOLUTION TO DENY THE PERMIT:

The Commission hereby denies a coastal development permit for the proposed development on the ground that the development will not conform with the policies of Chapter 3 of the Coastal Act and will 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. Approval of the permit would not comply with the California Environmental Quality Act because there are feasible mitigation measures or alternatives that would substantially lessen the significant adverse impacts of the development on the environment.

I. Findings and Declarations

The Commission hereby finds and declares:

A. Project Description and Background

The subject site is a 2.92-acre vacant bluff top lot located on the south (seaward) side of Pacific Coast Highway, immediately west of the intersection of Encinal Canyon Road and Pacific Coast Highway, in the City of Malibu (Exhibit 1). The bluff top area south of Pacific Coast Highway in the vicinity of the subject site is characterized by scattered residential development, vacant parcels, and parkland. The subject property is situated between La Piedra State Beach to the west and a narrow vacant parcel to the east (Exhibits 1 and 2). Access to the site is directly from Pacific Coast Highway.

The applicant is proposing the construction of a 8,129 sq. ft., 28 ft. high, two-story single family residence with 675 sq. ft. attached garage, 660 sq. ft. basement, 202 sq. ft.

sunset pavilion, swimming pool, spa, driveway, retaining walls, septic system, and 2,192 cu. yds. of grading (1665 cu. yds cut, 8.2 cu. yds fill, 518.5 cu. yds overexcavation). (See Exhibits 3 through 7)

Slopes on site descend gently to the south, with approximately a 40-foot change in elevation from Pacific Coast Highway to the top seawardmost edge of the bluff. A nearly vertical coastal bluff descends from the southern margin of the bluff top terrace approximately 125 feet to the beach area below. In addition, a steep ravine aligns the western property boundary adjacent to La Piedra State Beach. This drainage is not a United States Geological Survey designated "blueline" drainage course. Slopes descend steeply into this north-south trending ravine, with the descending bluff nearly vertical and ranging in height from 50 to 100 feet. All proposed development would be located on the relatively gently sloping bluff top portion of the site (Exhibit 3). The residence is proposed in the northeast portion of the property, set back from the coastal bluff to the south and the ravine to the west.

Vegetation at the project site is heavily disturbed along the entire bluff top. The applicant asserts that the disturbance is due to fuel modification requirements associated with Pacific Coast Highway and existing development on neighboring properties to the east. Vegetation on the site is relatively sparse consisting primarily of weedy vegetation with the exception of a mature stand of Eucalyptus trees along the eastern property boundary.

Pacific Coast Highway is designated as a scenic highway for coastal views in the previously certified County of Los Angeles Malibu/Santa Monica Mountains Land Use Plan (LUP). Views from Pacific Coast Highway along the property are partially impaired by the existing stand of eucalyptus trees. The proposed residence would significantly reduce the existing bluewater views across the property. The site is adjacent to La Piedra State Beach and the proposed development would be visible from the entrance, parking lot, and other locations along the bluff top at the state park.

B. Visual Resources

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 subordinated to the character of its setting.

Coastal Act Section 30251 requires that visual qualities of coastal areas shall be considered and protected, landform alteration shall be minimized, and where feasible, degraded areas shall be enhanced and restored. In addition, the certified County of Los Angeles Malibu/Santa Monica Mountains Land Use Plan (LUP) has been used as

guidance by the Commission to protect specific visual resources in the Malibu/Santa Monica Mountains area. In this particular case, the LUP recognizes adjacent Pacific Coast Highway as a scenic highway, and specifically provides for protection of the panoramic bluewater view of the Pacific Ocean from the highway. To assess any potential visual impacts of this project to the public, the Commission also reviews the publicly accessible locations where the proposed development is visible, such as parks and trails. The proposed project would be visible from La Piedra State Beach, which is adjoins the subject parcel's westernmost property boundary.

The applicant is proposing to construct a new single family residence on a 2.92-acre, vacant bluff top lot. The parcel extends approximately 130 feet in width at Pacific Coast Highway and widens to approximately 246 feet at the base of the bluff. Development is proposed in the northeast portion of the property, near Pacific Coast Highway. The project includes construction of a 8,129 sq. ft., 28 ft. high, two-story residence with 675 sq. ft. attached garage, 660 sq. ft. basement, 202 sq. ft. sunset pavilion, swimming pool, spa, driveway, retaining walls, septic system. In addition, the applicant proposes 2,192 cu. yds. of grading (1665 cu. yds cut, 8.2 cu. yds fill, 518.5 cu. yds overexcavation) at the site (Exhibit 3).

The project site is a vacant bluff top lot on the seaward side of Pacific Coast Highway in a partially built-out area of Malibu, primarily consisting of residential development. Vegetation at the project site is heavily disturbed, consisting primarily of low-lying grasses and weeds with the exception of a mature stand of eucalyptus trees that aligns the eastern property boundary. The eucalyptus trees and several large shrubs along Pacific Coast Highway partially block bluewater ocean views from Pacific Coast Highway along the site.

Pacific Coast Highway is designated as a scenic highway for coastal views by the LUP. Pacific Coast Highway is also a major coastal access route, not only utilized by local residents, but also heavily used by tourists and visitors to access several public beaches located in the surrounding area which are only accessible from Pacific Coast Highway. Construction of single family residences, privacy walls, fencing, landscaping, and other residential related development between Pacific Coast Highway and the ocean may block public views of the beach and water from Pacific Coast Highway. As a result, the construction of individual beachfront or bluff top residences, when viewed on a regional basis, has the potential to result in significant cumulative adverse effects to public views and to the visual quality of coastal areas.

In past permit actions, the Commission has required that new development located on the seaward side of Pacific Coast Highway be sited and designed to protect public bluewater views of the ocean and, where feasible, to restore and enhance visual quality in visually degraded areas. Specifically, in regard to new development located on beachfront lots the Commission has required that new development occupy no more than 80% of the lineal frontage of Pacific Coast Highway in order to maintain a public view corridor over the lot for ocean views [Saban (4-99-146), Broad (4-99-185), 4-99-154 (Montanaro)]. In addition, in past permit actions regarding development on bluff top sites where slopes descend seaward from the highway, such as the proposed project site, the Commission has limited the height of new structures and landscaping to an

elevation adequate to ensure that public views of the ocean are retained over the entire project site [CDPs 4-98-142, -143, & -163 (Duggan & Levinson), CDP 4-97-031 (Anvil), CDP 5-90-020 (Young)]. Coastal Development Permits 4-98-142, -143 and -163 were approved by the Commission in 1998 for the construction of three new single family residences on the three separate neighboring vacant lots immediately east of the subject site. The Commission notes that the approved single family residences on the neighboring lots to the east were limited to a single story of no more than 18 ft. in height in order to ensure that ocean views were retained above the rooflines of the residences. Similarly, under Coastal Development Permit 4-99-169, the Commission found that the proposed 28-foot high single-family residence would adversely impact public bluewater views of the ocean from the highway by extending at or near the horizon line. The Commission required revisions to the plans to lower the height to preserve public views of the ocean.

In the subject application, the proposed 28 ft. high, two-story residence is designed at a height equal to the elevation of Pacific Coast Highway at its centerline. Although the development is proposed downslope and below the centerline elevation of Pacific Coast Highway, the development will significantly reduce or completely block public views of the ocean over a portion of the subject site. Staff has confirmed during a site visit that the proposed structures would significantly block public views of the ocean from Pacific Coast Highway. At Staff's request, prior to the site visit, the project site was staked with poles and flagging adequate to indicate the footprint and height of the proposed buildings. Staff notes, based on visual analysis of the staked project site, that the proposed roofline would extend near the horizon line significantly blocking public bluewater views of the ocean as seen from points along Pacific Coast Highway from La Piedra State Beach to points east of the property. Exhibits 6 and 7 include photographic simulations of the development, as proposed, from two vantage points, across from the parcel along Pacific Coast Highway and from the entrance to La Piedra State Beach.

The applicant's representative suggests that the removal of existing vegetation at the site, including the large stand of eucalyptus trees along the eastern property line, would open up the public views toward the ocean from the site. The applicant's representative suggests that tree removal be credited as mitigation to offset the impacts of the proposed project on public coastal views. The applicant's representative further suggests that the undergrounding of the utilities at the front of the property, along Pacific Coast Highway, would enhance the visual quality in the area, mitigating, in part, the impact to public views the project will otherwise cause. These measures would not, however, reduce the impacts upon public coastal views that would be caused if the project is constructed in accordance with the description as presently proposed. In addition, many of the trees suggested for removal by the applicant would be removed to accommodate the proposed development in any case. Moreover, the lifespan of these mature trees is finite and replanting with the same species in the same locations would not be in compliance with the landscape conditions typically imposed by the Commission. Thus, removal of these trees would have minimal value as visual resource impact mitigation.

Staff has discussed the project's potential effects on public bluewater views with the applicant, and has explored with the applicant conceptual design modifications to avoid

or reduce these impacts. The applicant has conceptually proposed an alternative that would reduce the height of the residence by approximately three feet by increasing site grading and reducing the proposed pad elevation by three feet. The applicant supplied a photographic simulation of the impact to ocean views from Pacific Coast Highway based on the original proposal and the conceptually reduced height alternative. These simulations are included as Exhibits 6 and 7. Though the revised project would lower the profile of the structure, the reduction is insufficient to avoid the impact. Despite the applicant's conceptual changes there would still be a significant adverse impact to the bluewater views under this scenario. Due to the modest gradient of the bluff top, the applicant asserts that lowering the residence more than three feet would require design changes to include a larger basement or subterranean floor, or would require extensive grading of the bluff top to allow daylighting of the structure. Therefore, the applicant has declined to incorporate more extensive changes that might sufficiently reduce the project's impacts so that public coastal views from Pacific Coast Highway are not impaired.

However, as discussed in Section D, below, potential modifications in the design of the residence have been identified that would preserve ocean views and still allow the applicant to construct a large single story residence. As presently designed, the first floor of the proposed residence is 6,079 square feet. Living space could be further supplemented by including a larger below grade, or partially below grade, basement sub-story. As discussed in detail in Section D, it is clearly feasible to redesign this project consistent with Section 30251 of the Coastal Act which mandates that views to the ocean be protected. As determined in the alternatives analysis below, views would be adequately preserved by limiting the project to a single story of no more than 18 ft. in height. If the residence was designed at 18 feet in height above natural grade, the standard height permitted in the City of Malibu and consistent with previous Commission actions, a significant portion of public bluewater views would be retained over the structure. This height limit would allow for a single story residence with a pitched roofline.

The proposed project includes the construction of a masonry wall with a wood gate at the front of the residence, downslope of Pacific Coast Highway. The wall is proposed at a height equal to the centerline elevation of Pacific Coast Highway. However, privacy walls, gates, landscaping, and other features associated with the residence may also intrude into the view horizon, effectively impairing views from Pacific Coast Highway. In past permit actions, the Commission has required use of low-lying plant species and visually permeable gates and fences at heights that would not block or adversely impact public views of the ocean from the highway. In this case, any associated structural or landscaping features on the bluff top must be designed in a manner consistent with the protection of public views. Development features, including landscaping, should be designed to lie below an abstract plane as drawn between the centerline of Pacific Coast Highway and the dominant ridgeline of the roof of the proposed residence. This restriction ensures that appurtenant structures and landscaping will not impact public views from Pacific Coast Highway toward the ocean.

Therefore, for the reasons discussed above, the Commission finds that the proposed development is not consistent with Section 30251 of the Coastal Act. Furthermore, the

Commission finds that the adverse effects of the proposed project on public ocean views can be feasibly reduced by limiting the design of the residence to a single story residence of 18 feet in height.

C. Alternatives

Although the Commission is denying the applicant a coastal development permit for the residence as proposed, the Commission notes that the applicant is not barred from applying for a permit or pursuing an alternative proposal that minimizes the impact to bluewater views along Pacific Coast Highway. As described in more detail below, basic changes in the design of the residence have been identified that would preserve ocean views while still allowing the property to be developed with a single-family residence in compliance with the Coastal Act.

In the subject application, the applicant has proposed a 28-foot residence, which extends near or above the horizon as viewed from points along Pacific Coast Highway from La Piedra State Beach to points east of the property. To address this issue, staff reviewed typical options that would eliminate the adverse effects to public bluewater views at the site, including (1) relocating the development to a more appropriate site on the property, (2) designing the project to align with the topographic contours of the site, (3) excavating the residence into the landform to achieve an adequate reduction in height, and (4) limiting the structure to a single story.

The first option, to relocate the development footprint to an alternative location on the site would increase, rather than reduce, project impacts on public coastal views. The development potential of the site is constrained by geologic and hazard setbacks from the bluff (south) and the ravine (west). In addition, siting it further south on the bluff top would impact public views from one of the most prominent viewpoints, the entrance to La Piedra State Beach. Exhibit 7 illustrates the existing and proposed conditions, in a photographic simulation provided by the applicant, of the proposed project from the La Piedra State Beach entrance. Moving the residence location further south would increase the adverse impact to this view corridor. Therefore the proposed building site is the most logical location for development of a single family residence on the site, and furthermore, any modification to site location may have additional adverse effects to bluewater views as seen from public viewing points.

The second option, "stepping" the residence into the topographic contours of the site by grading multiple levels along the slope, is of limited mitigation potential due to the gentle slope of the bluff top.

The third option, to lower the structure by excavating the structure into the landform, was considered by staff to offer significant potential reductions in the project's adverse impacts on public coastal views. The applicant provided a conceptual plan to lower the proposed residence into the building site by only three feet, while retaining a total structural height of 25 feet above natural grade. This alternative lowers the profile of the residence somewhat but the profile would nevertheless extend near the horizon line, blocking most of the ocean views available above the structure (Exhibit 6d). The applicant indicated that lowering the residence, as presently designed, more than three

feet would not be reasonably feasible. Due to the modest gradient of the bluff top, the applicant asserts that lowering the residence more than three feet would require design changes to include a larger basement or subterranean floor, or would require extensive grading of the bluff top to allow daylighting of the structure. Therefore, the applicant has declined to pursue this alternative. However, it appears that this alternative would allow development of a multi-level residence and would minimize the adverse impacts to public views of the ocean.

The fourth option is to minimize adverse effects upon public views by limiting the project to a single story of no more than 18 ft. in height. If the residence was designed at 18 feet in height above natural grade, the standard height permitted in the City of Malibu and consistent with previous Commission actions, a significant portion of public bluewater views would be retained over the structure. This height limit would allow for a large single story residence with a pitched roofline and is a feasible alternative. Design of the residence may include a below grade, or partially below grade, larger basement sub-story to supplement the single story, as considered in option three above.

As presently designed, the first floor of the proposed residence is 6,079 square feet in size. This floor area is above the average (total) size of other bluff top residences in the vicinity. For example, of the ten bluff top lots developed with residences to the east, eight are less than 2,800 sq. feet in size, according to Los Angeles County Assessor data. To the west of the site between La Piedra State Beach and El Pescador State Beach, there are seven bluff top lots with existing residences, or Commission-approved residences not yet constructed. Of these residences, five are under 3,300 square feet in size as reported in Los Angeles County Assessor records.

For the above mentioned reasons, the Commission finds that it is feasible to substantially reduce the adverse effects of the proposed project on public ocean views by modifying the design of the project to a single story residence limited to 18 feet in height. For the above reasons, the Commission finds that the proposed project as designed is not consistent with the visual resource policies of the Coastal Act.

D. Local Coastal Program

Section 30604 of the Coastal Act states:

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 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 would not be in conformity with the provisions of Chapter 3 of the Coastal Act. The

proposed development would result in adverse effects and is found to be inconsistent with the applicable policies contained in Chapter 3. Therefore, the Commission finds that approval of the proposed development would prejudice the City of Malibu's ability to prepare a Local Coastal Program which is also consistent with the policies of Chapter 3 of the Coastal Act as required by Section 30604(a).

E. CEQA

Section 13096(a) of the Commission's administrative regulations requires Commission approval of Coastal Development Permit application 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 which would substantially lessen any significant adverse effect that the activity may have on the environment.

The Commission finds that the proposed project would result in significant adverse effects on the environment, within the meaning of the California Environmental Quality Act of 1970 and that there are feasible alternatives which would substantially reduce the project's adverse impacts on coastal access or visual resources. Therefore, the proposed project is determined to be inconsistent with CEQA and the policies of the Coastal Act.

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MAP
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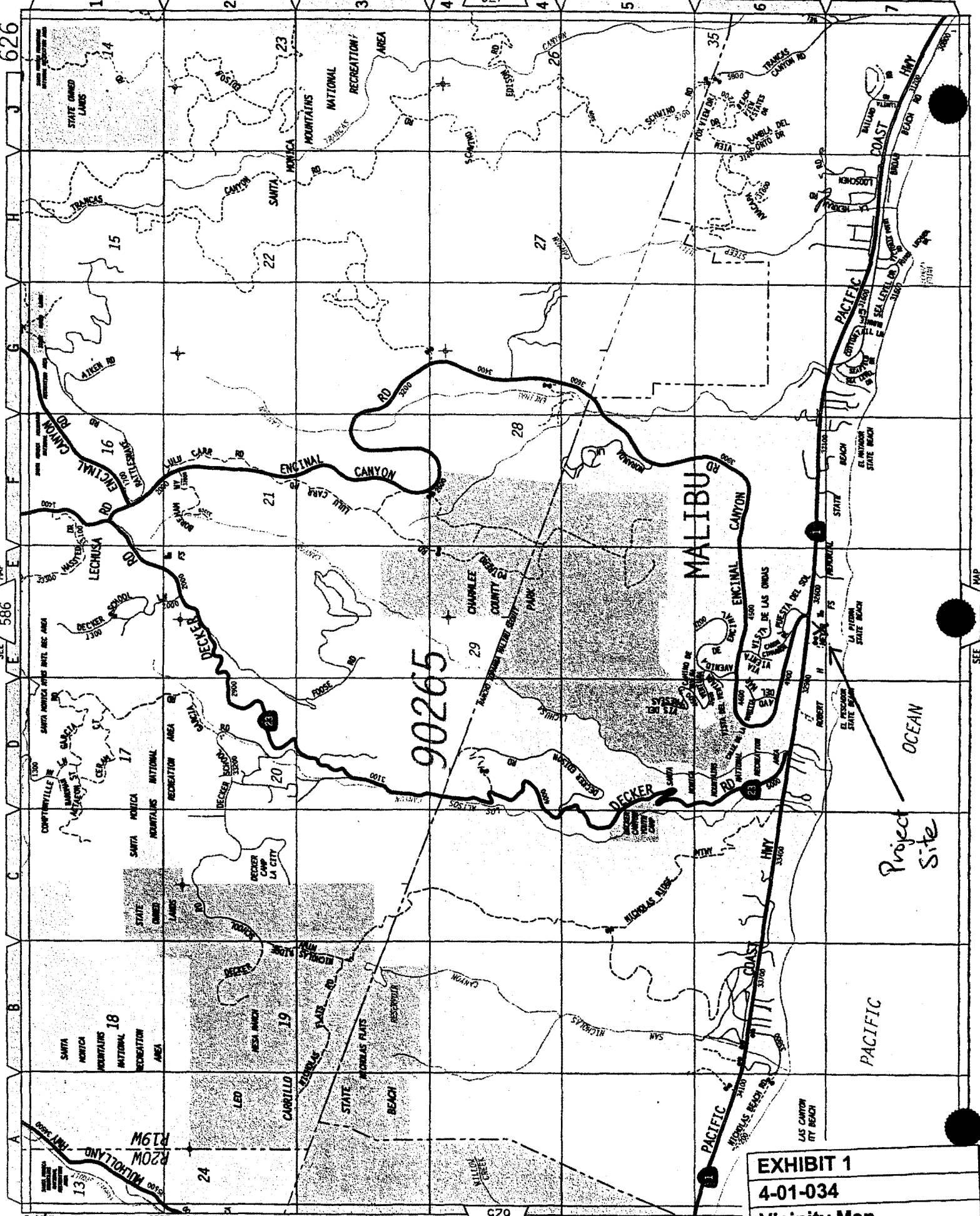
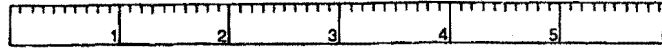


EXHIBIT 1
4-01-034
Vicinity Map

1-800-345-7334

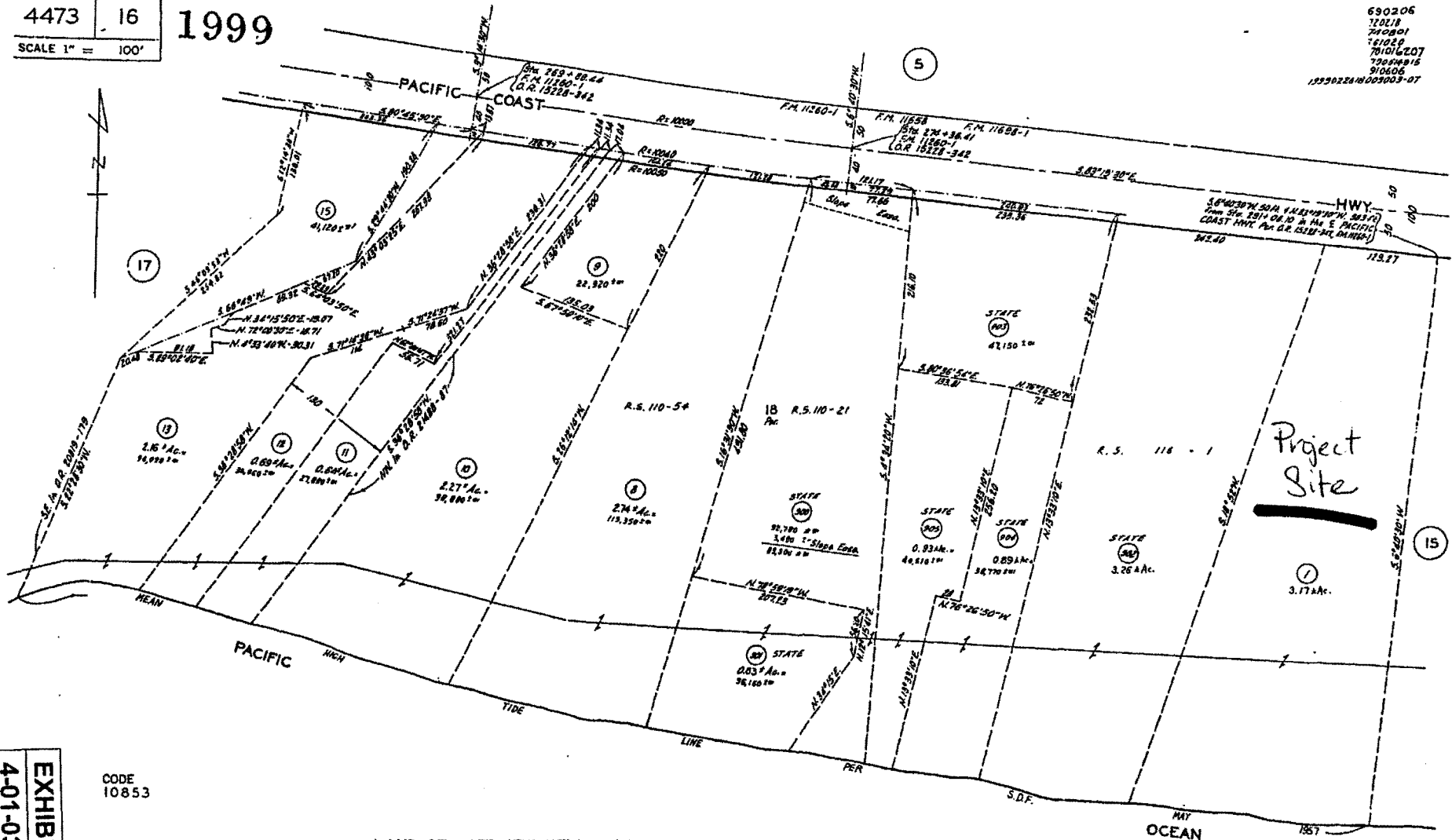


SCALE IN 1/10 OF AN INCH

4473 16
SCALE 1" = 100'

1999

690206
710218
740201
710209
70101207
70040916
910606
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Project Site

EXHIBIT 2
4-01-034
Parcel Map

CODE 10853

FOR PREV. ASSMT SEE:
4470-17, 32, 33

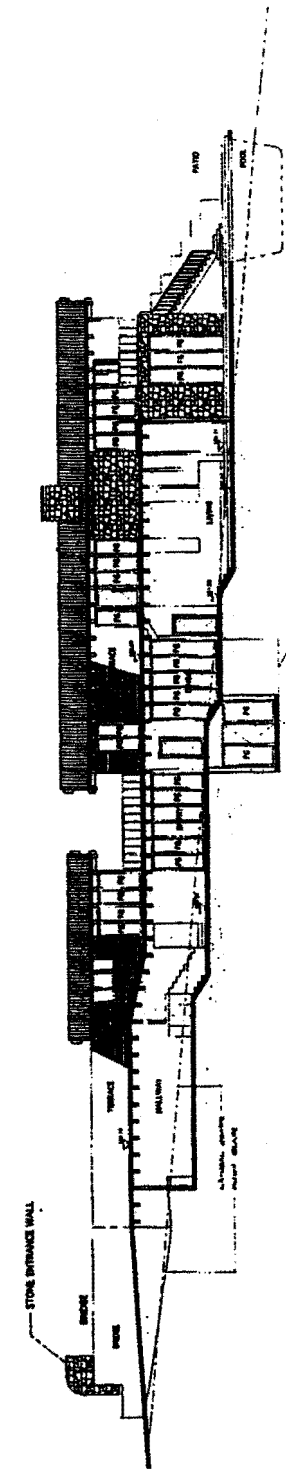
LAND OF MATTHEW KELLER IN THE
RANCHO TOPANGA MALIBU SEQUIT

R.F. 534

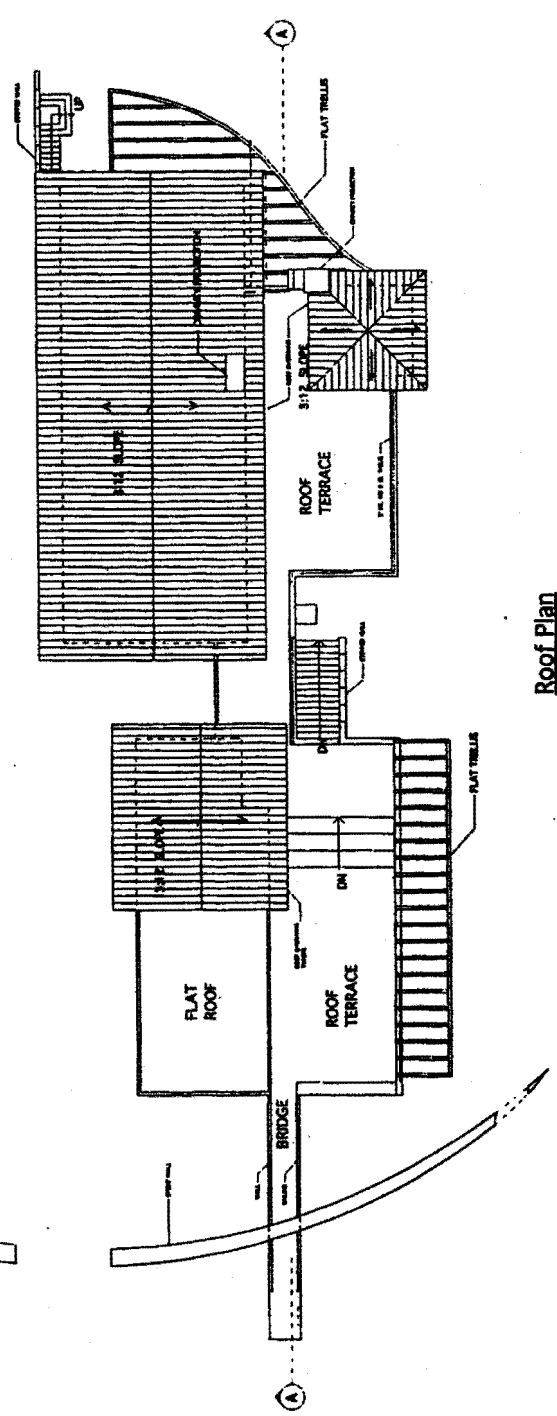
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ASSESSOR'S MAP
COUNTY OF LOS ANGELES, CALIF.

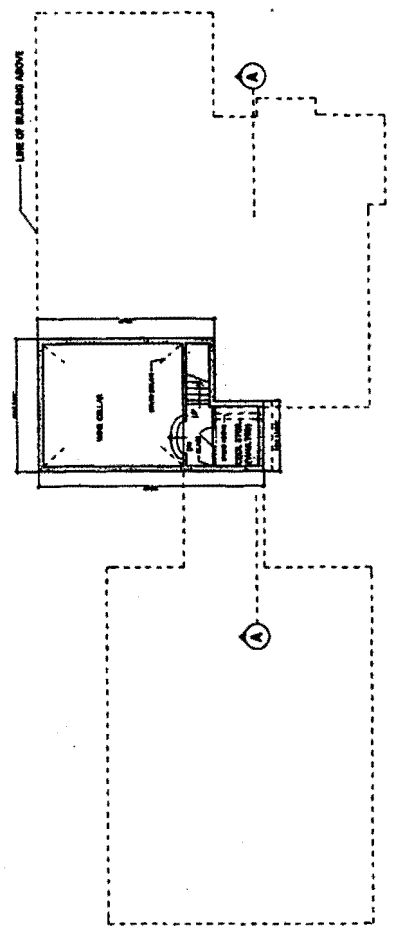
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Section A



Roof Plan



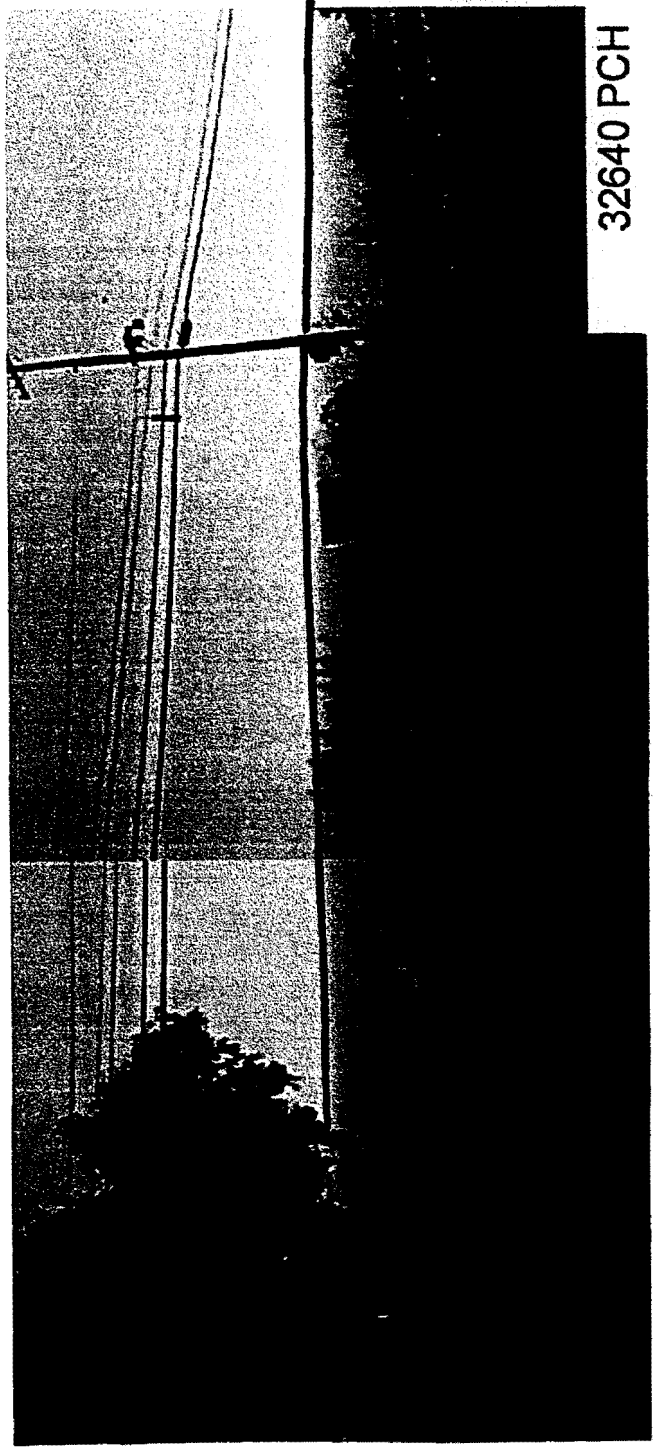
Basement Plan
660 S.F.

An aerial photograph showing a coastal area. A road, identified as Pacific Coast Highway, runs horizontally across the middle of the image. To the left of the road, there is a winding path or road. To the right, there are several buildings and structures. The foreground shows a rocky or uneven terrain. A white box with black text is overlaid on the top part of the image.

Observation Point
From PCH

32640 : : : : PACIFIC COAST HIGHWAY

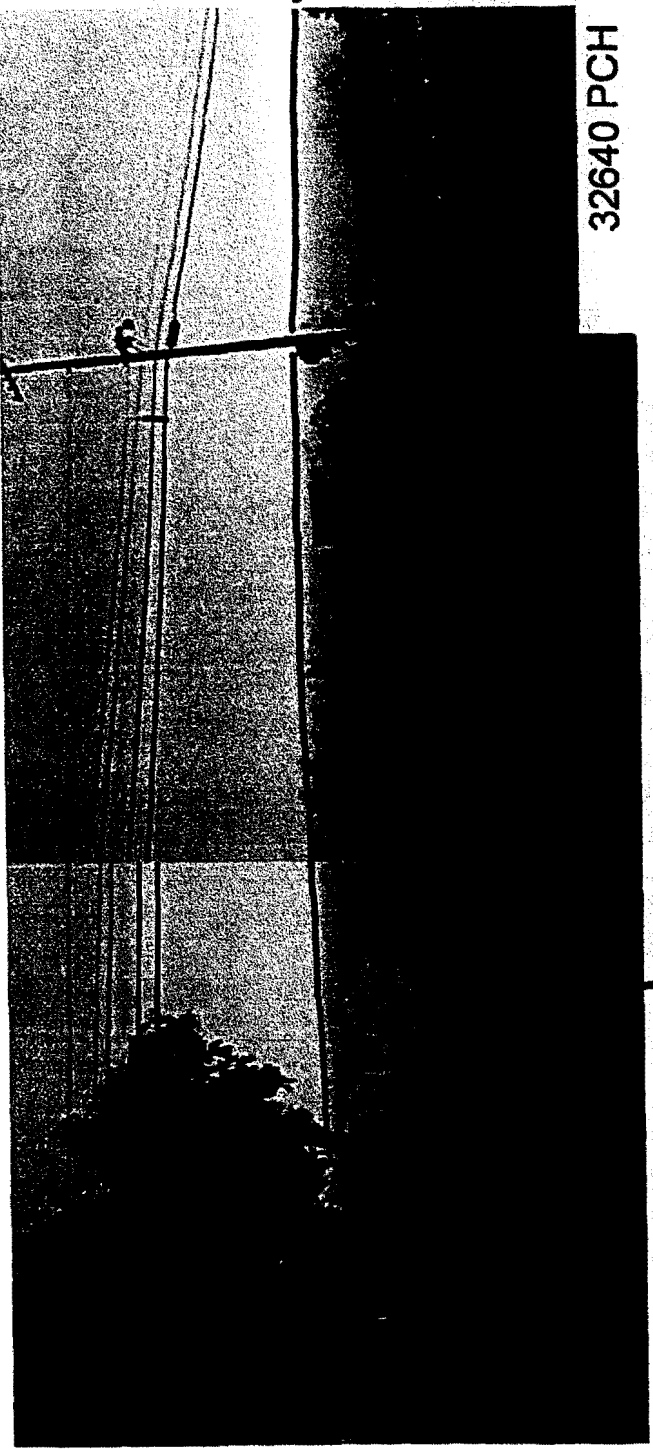
EXHIBIT 6a
4-01-034
Visual Simulation: From Pacific Coast Highway
OBSERVATION POINT ORIENTATION



32640 PCH

1) EXISTING SITE

EXHIBIT 6b
4-01-034
Visual Simulation: From Pacific Coast Highway
EXISTING SITE



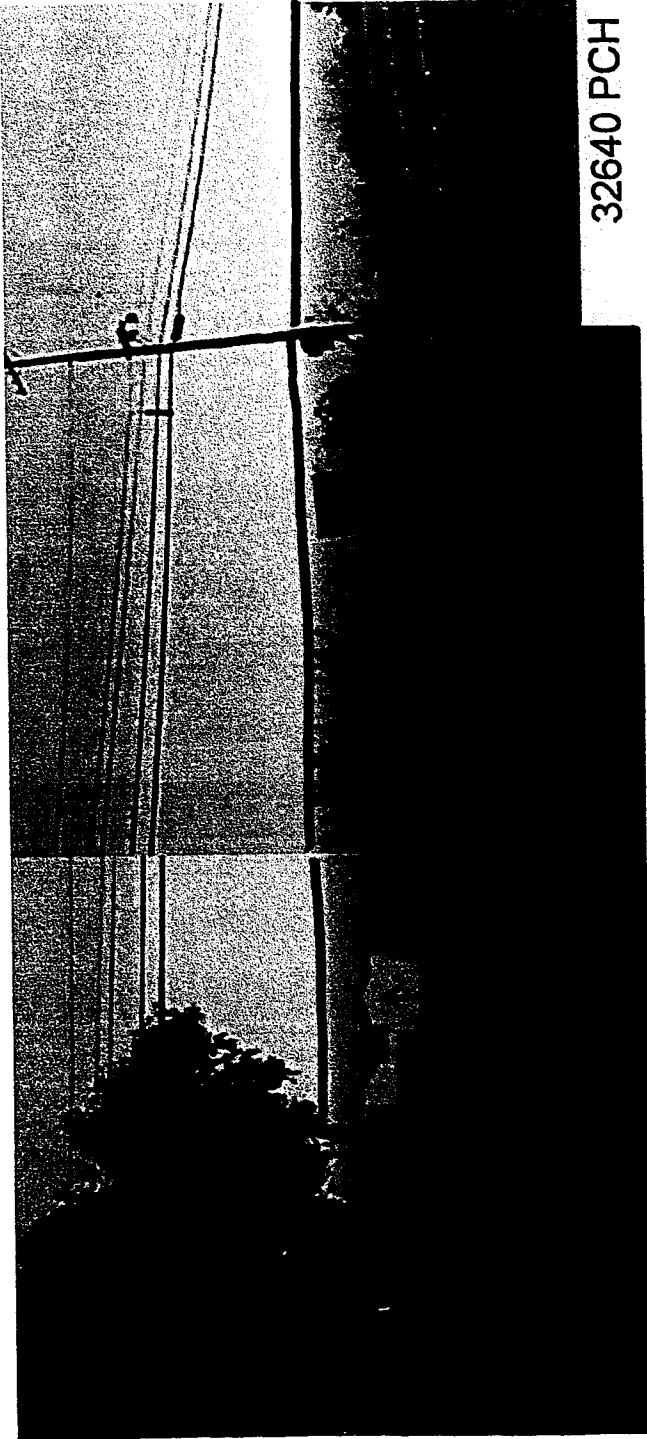
← bluewater horizon

32640 PCH

2) ROOFLINE AS SUBMITTED

proposed structure

EXHIBIT 6c
4-01-034
Visual Simulation: From Pacific Coast Highway
RESIDENCE AS PROPOSED



3) ROOFLINE LOWERED 3'

structure

EXHIBIT 6d
4-01-034
Visual Simulation: From Pacific Coast Highway
RESIDENCE LOWERED AN ADDITIONAL 3 FT.



32640 PCH

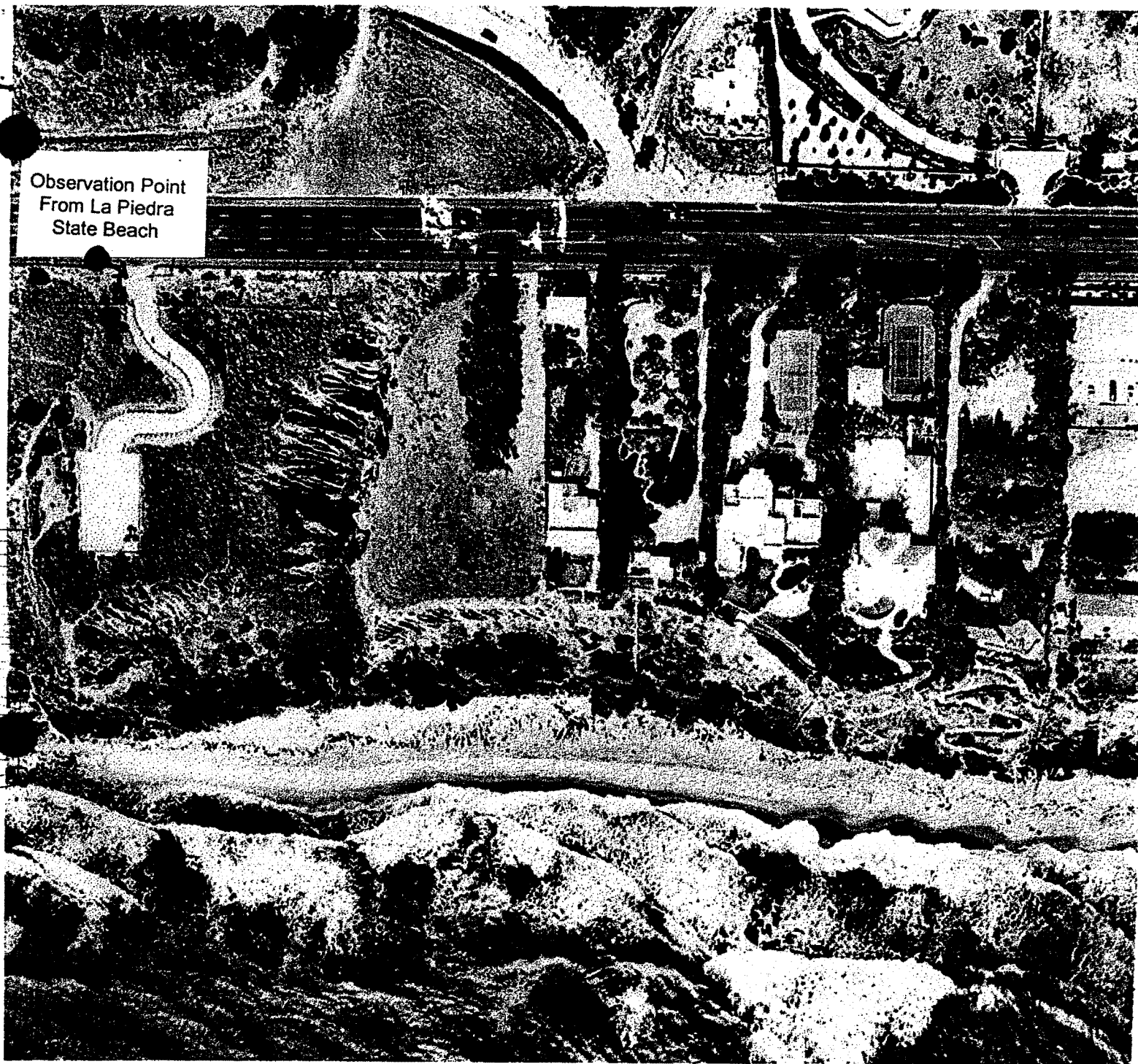
← horizon

4) ROOFLINE LOWERED 3'
W/P.L.'S @ PLANE OF FRONT
OF HOUSE; NO TREES

structure

EXHIBIT 6e
4-01-034
Visual Simulation: From Pacific Coast Highway
LOWERED RESIDENCE WITH REMOVAL OF TREES & POWERLINES

:\pt\4-01-041 story poles.2(4).jpg

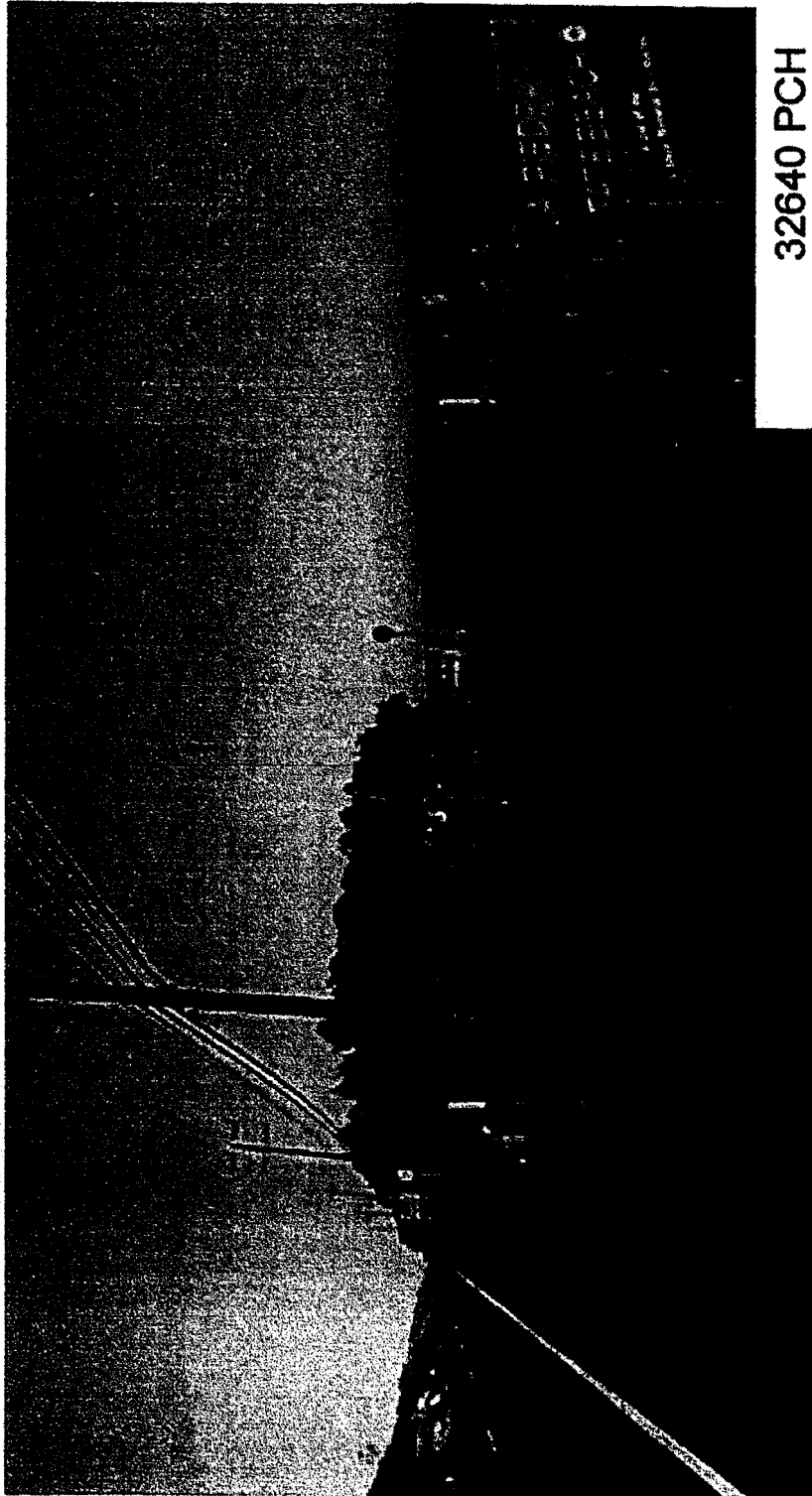


32640

PACIFIC COAST HIGHWAY

EXHIBIT 7a
4-01-034
Visual Simulation: From La Piedra State Beach Entrance
OBSERVATION POINT ORIENTATION

← horizon



32640 PCH

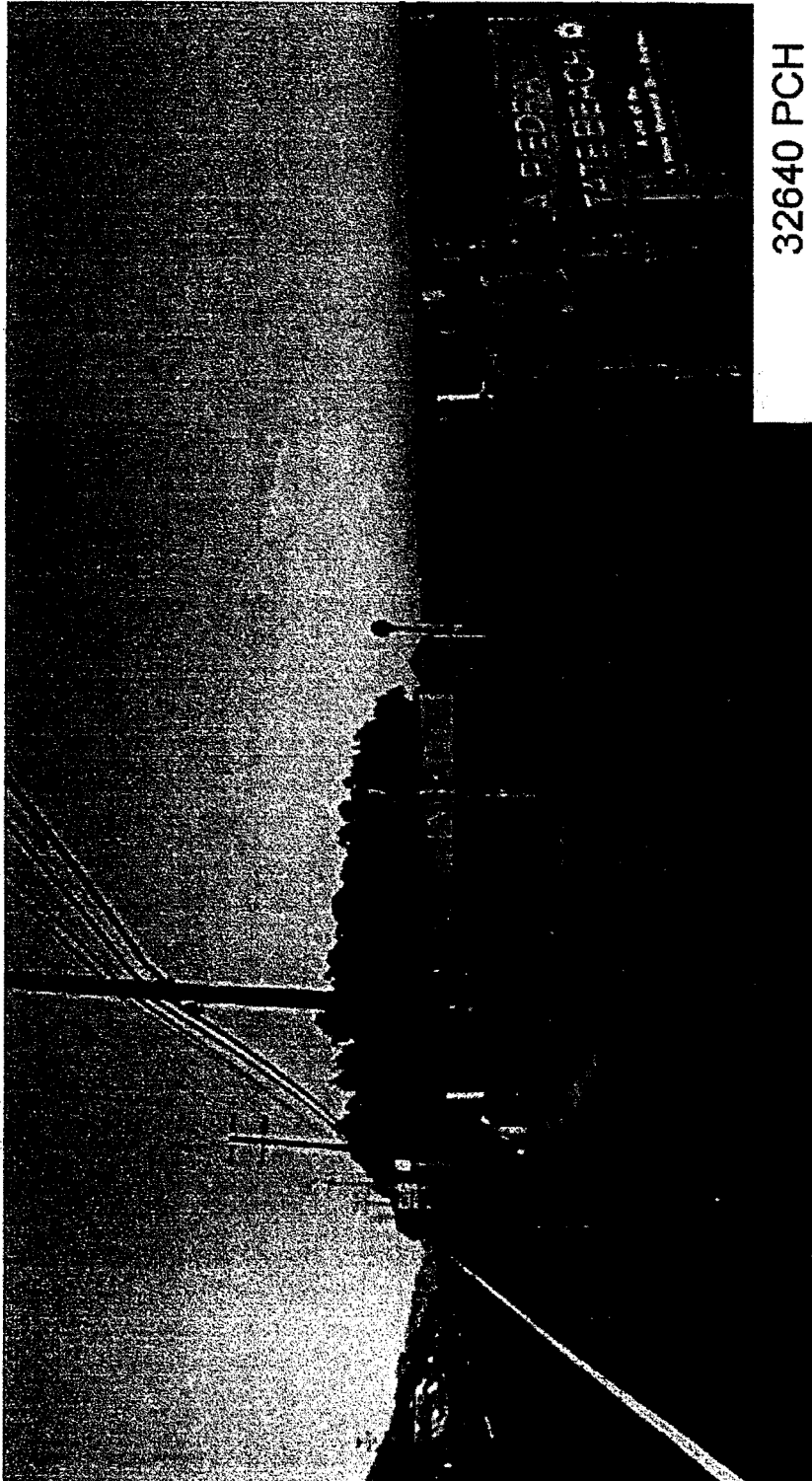
1) EXISTING SITE

10/2/01

1-041 story poles.1(1).jpg

EXHIBIT 7b
4-01-034
Visual Simulation: From La Piedra State Beach Entrance
EXISTING SITE

← horizon



32640 PCH

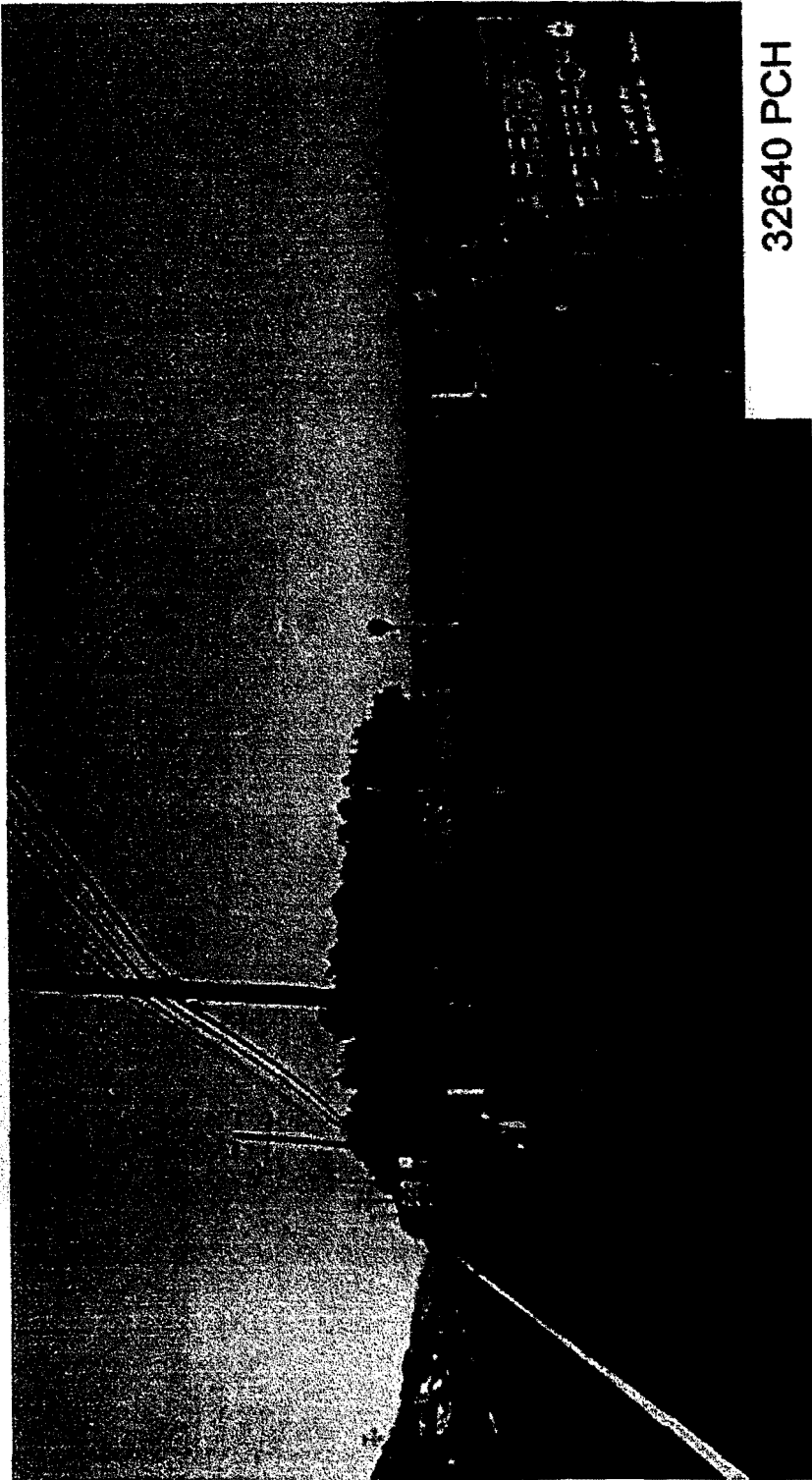
2) ROOFLINE AS SUBMITTED

Structure

1 story poles 1(2).jpg

EXHIBIT 7c
4-01-034
Visual Simulation: From La Piedra State Beach Entrance
RESIDENCE AS PROPOSED

← horizon



32640 PCH

3) ROOFLINE LOWERED 3'

Structure

041 story poles (3).jpg

EXHIBIT 7d
4-01-034
Visual Simulation: From La Piedra State Beach Entrance
RESIDENCE LOWERED AN ADDITIONAL 3 FT.