

TK  
1/28/01**CALIFORNIA COASTAL COMMISSION**CENTRAL COAST DISTRICT OFFICE  
725 FRONT STREET, SUITE 300  
SANTA CRUZ, CA 95060  
(831) 427-4863**TH 7C****RECORD PACKET COPY**

Filed:	08/07/00
49 <sup>th</sup> Day:	09/25/00
Staff:	RB
Staff Report:	1/26/01
Hearing Date:	2/15/01
Commission Action:	
Opened and Continued	09/14/00
Substantial Issue	11/15/00

**STAFF REPORT: REGULAR**

**Appeal Number** .....A-3-SLO-00-119

**Local Government** .....San Luis Obispo County

**Decision** .....Approved with conditions, 047/07/00

**Applicant** .....Joe Todd

**Appellants** .....Commissioners Sara Wan and Pedro Nava

**Project Location** .....16485 Cabrillo Highway (approx. 1.5 miles north of Piedras Blanca Lighthouse, North Coast Area Plan), San Simeon (San Luis Obispo County) (APN 011-231-001)

**Project Description** .....Construction of an approximately 2,980 sq. ft. single family dwelling with attached 720 sq. ft. garage, and 1,200 sq. ft. barn.

**File Documents** .....San Luis Obispo County Certified Local Coastal Plan; Coastal Development Permit D990190P; COAL 90-137.

**Staff Recommendation** .....Denial

**EXECUTIVE SUMMARY**

The proposed development is located on a roughly rectangular site on the portion of the property east of Highway 1, approximately 1.5 miles north of Piedras Blancas Lighthouse, San Luis Obispo County. The applicant proposes to construct an approximately 2,980 square foot, one-story, single family residence with an attached 720 square foot garage, a 1,120 square foot barn, water well and a water storage tank on a 4.37 acre site. The surrounding land is currently owned by the Hearst Corporation and is used for cattle grazing, with the exception of three vacant parcels, ranging from 3.4 to 6.4 acres, located directly south of the property.

The proposed residential development poses significant adverse impacts to visual and scenic resources because the structures are not designed to be subordinate to, or blend with, the rural character of the area. This stretch of the California coast is regarded as a

**California Coastal Commission**

scenic coastal resource of great public importance. Feasible alternatives exist that would result in a reconfigured project that would comply with the resource policies of the San Luis Obispo County LCP. Because such a substantial redesign of the project is necessary to bring it into conformance with the LCP, staff recommends that the Commission **deny** the coastal development permit for the project as approved by the County of San Luis Obispo.

In addition, because this area is designated for agricultural use, development of this single-family dwelling creates potential conflicts between residential and surrounding agricultural uses. Also, the proposed development is located outside the San Simeon Urban Services Line; therefore, more definitive information regarding water availability on the subject parcel should be secured. Additionally, because there are known prehistoric cultural resources in the area of the project, care should be taken to ensure that no ground disturbing activities will harm any potential archaeological resources on the site. Although these circumstances alone are not a basis for denial, a redesigned project should include remedies to address the issues as discussed in this staff report.

#### STAFF REPORT CONTENTS

Executive Summary .....	1
Staff Report Contents .....	2
Staff Recommendation on Coastal Development Permit.....	2
Recommended Findings and Declarations .....	3
A. Visual Resources .....	3
B. Agriculture .....	8
C. Water .....	10
D. Archaeology .....	10
California Environmental Quality Act (CEQA) .....	11
Exhibits.....	<b>Error! Bookmark not defined.</b>
1. Vicinity Maps	
2. Project Plans	
3. Site Photos	
4. County's Conditions of Approval	
5. COAL 90-137 Exhibit	
6. Applicant's Visual Analysis	

#### STAFF RECOMMENDATION ON COASTAL DEVELOPMENT PERMIT

Staff recommends that the Commission, after the public hearing, **deny** coastal development permit application A-3-SLO-00-119.

**MOTION:** *I move that the Commission approve Coastal Development Permit No. A-3-SLO-00-119 as approved by San Luis Obispo County.*



Staff recommends a **NO** vote. Failure to pass 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 prejudice the ability of the local government having jurisdiction over the area to carry out 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.

### **RECOMMENDED FINDINGS AND DECLARATIONS**

#### **A. Visual Resources**

The property is located approximately 1.5 miles north of Piedras Blancas Lighthouse, away from urban development and is within a more rural setting (within the Agriculture Land Use Category) on the North Coast of San Luis Obispo County. The parcel is approximately 4.37 acres (1,155 feet long and 165 feet wide) and slopes up gradually from Highway 1.

Policy 1 for Visual and Scenic Resources states in relevant part:

*Unique and attractive features of the landscape, including but not limited to unusual landforms, scenic vistas and sensitive habitats are to be preserved, protected, and in visually degraded areas restored where feasible.*

Policy 2 for Visual and Scenic Resources addresses site selection for new development:

*Permitted development shall be sited so as to protect views to and along the ocean and scenic coastal areas. Wherever possible, site selection for new development is to emphasize locations not visible from major public view corridors. In particular, new development should utilize slope created "pockets" to shield development and minimize visual intrusion.*

Policy 4 for Visual and Scenic Resources applies to new development in rural areas:

*New development shall be sited to minimize its visibility from public view corridors. Structures shall be designed (height, bulk, style) to be subordinate to, and blend with, the rural character of the area. New development which cannot be sited outside of public view corridors is to be screened utilizing native vegetation; however, such vegetation, when mature, must also be selected and sited in such a manner as to not obstruct major public views.*



Finally, Policy 5 for Visual and Scenic resources addresses grading and landform alteration:

*Grading, earthmoving, major vegetation removal and other landform alterations within public view corridors are to be minimized. Where feasible, contours of the finished surface are to blend with adjacent natural terrain to achieve a consistent grade and natural appearance.*

North Coast Area Plan Standard for Site Design and Building Construction addresses site selection criteria for lands outside of urban and village reserve lines.

1. **Site Selection.** *Primary site selection for new development shall be locations not visible from Highway 1 as follows:*
  - a. *Sites shall be selected where hills and slopes would shield development unless no alternative location exists or the new development provides visitor-serving facilities.*
  - b. *New development shall be located so that no portion of a structure extends above the highest horizon line of ridgelines as seen from Highway 1.*
  - c. *Where single ownership is on both sides of Highway 1, building sites shall be located on the east side of Highway 1 except for identified visitor-serving development.*
  - d. *Development proposals for sites with varied terrain are to include design provisions for concentrating developments on moderate slopes, retaining steeper slopes visible from public roads undeveloped.*

The applicant has proposed, and the County approved, a residence and barn located on the least visible portion of the parcel, at the eastern end of the property, approximately 800 feet from the highway. A large knoll is located to the north of the property, which helps shield the proposed residence from view of southbound travelers; however, the entire property is visible from northbound Highway 1. The proposed single-story residence is approximately 15'7" in height and the applicant has proposed landscaping that will help screen the project from northbound travelers. The barn, which is approximately 1,120 square feet and 15'6" in height, is located behind the residence and will not be shielded by the proposed landscape screening.

The project site, as well as the three vacant parcels immediately to the south of the site, are surrounded by the vast open spaces of the approximately 77,000 acre Hearst Ranch. The scenic character of this area is defined by rolling hills and wide coastal terraces vegetated with grasses and low growing, shrubby plants that turn green and gold with the seasons. Major vegetation like the pine and oak forests found elsewhere in the San Luis



Obispo Coastal Zone are not a part of the natural landscape along this portion of the north coast although some trees have been planted over the years to provide shade and act as wind breaks. Exhibit 3 depicts the open character of this area. This entire sweep of open, rolling hillsides and unspoiled landscape against the majestic backdrop of the Santa Lucia Mountains can be viewed by the public in a continuously unfolding panorama along Highway 1. Indeed, there is perhaps no reach of coast in California that is more visually sensitive than the North Coast of San Luis Obispo. This southern gateway to Big Sur is a powerful landscape of incomparable and stunning beauty that is extremely vulnerable to degradation by new development because of its open character, long vistas and lack of natural screening vegetation. The Commission recognized this most recently during its review of the San Luis Obispo County North Coast Area Plan Update (approved May 13, 1998), finding that the North Coast is "regarded as a scenic coastal resource of great public importance." The findings go on to observe the following in regard to the character of Hearst Ranch and the surrounding area:

*These views are often said to illustrate what "Old California" looked like before it was developed and urbanized. Even a relatively small amount of visible modern development would under these circumstances be intrusive, and would significantly degrade the sense of an essentially innocent landscape.*

There is no question that the current development proposal would significantly impact the scenic quality of the rural and rugged North Coast. As shown in Exhibits 3 and 6, the proposed development would be located in the middle of an undeveloped, open expanse of agricultural lands west of Highway 1 typical of this stretch of coast. The potential for three similar proposals immediately south of the project site raises concerns about the cumulative impact of development and its associated landscaping and landform alteration on this coastal terrace. Although some development can be seen from Highway 1 in this general area (i.e. Piedras Blancas Motel, Hearst Ranch residence), these buildings were constructed prior to adoption of the Coastal Act. They also provide evidence of the visual impacts that can result from inappropriately designed development in this sensitive area. (See, for example, the photos of the motel in Exhibit 6.) Moreover, given the scenic nature of this stretch of coast, it is that much more important to limit any additional development that would break up expansive views of the rolling hillsides and incrementally degrade the rural character of the North Coast. Thus, the greatest possible effort must be put forth to safeguard this area from the intrusions of new development.

Policy 2 for Visual and Scenic Resources and the North Coast Area Plan Standard regarding site selection serve to protect the unique qualities of scenic areas and prohibit the siting of development, where possible, in areas visible from public view corridors. As stated previously, the residence is located in the least visible portion of the site, consistent with this LCP policy and Planning Area Standard. Thus, in terms of visual resource impacts, the Commission does not raise issue with the general area currently proposed for development.



However, as required by Policy 4 for Visual and Scenic Resources, "new development shall be sited to minimize its visibility from public view corridors" and the structures in that area "shall be designed to be subordinate to, and blend with, the rural character of the area." In addition, Policy 1 for Visual and Scenic Resources requires that the scenic rural landscape of the North Coast be preserved and protected. Policy 4 also allows for the use of native vegetative screening to shield development *so long* as it does not obstruct major public views, but only after all efforts have been exhausted to site the development outside of public view corridors.

In the context of the rural agricultural North Coast, conformance with the visual policies of the LCP is best achieved without reliance on unnatural vegetation such as the Cypress or Eucalyptus trees that have been planted as windbreaks on other lots in the past.<sup>1</sup> The controlling objective of Policy 4 is to design new structures so as to be subordinate to and blend with the landscape. Policy 1 requires the protection of unique landscapes. Given the existing landscape, substantial unnatural vegetative screening around a residential structure would still constitute a significant intrusion into the North Coast rural character, particularly if alternatives exist for structural design that would not require significant vegetation screening.

The Applicant has recently submitted a visual analysis that illustrates this concern. (Please see Exhibit 6.) The analysis includes three photos of the same view of the site from Highway One (existing landform, existing landform with proposed structures, existing landform with proposed structures and vegetative screening). The depiction of the proposed dwelling screened by trees shows how the natural, open grassland landscape will be altered by the incongruous placement of a line of trees leading up from Highway One up to an unnatural appearing grove of trees encircling the house site. This screening, because it uses plant materials that are not generally seen in the context of this open landscape, serves to focus the viewers eye on this site rather than provide a setting that causes the proposed development to recede into the landscape and be visually unobtrusive and subordinate to its setting. An additional problem with the use of trees as screening material is that with age, the tree canopy that provides the most effective screening will often grow above the structures it was designed to obscure. The structures at that point become visible once again. (See, for example, Exhibit 6 showing the existing farmhouse to the south of this property surrounded by mature Cypress trees.) However, while the LCP also requires that landform alteration be minimized, it does allow such alteration if done in way to blend with adjacent natural terrain (Visual Policy 5). As discussed below, siting and design options that rely on natural-looking berms, rather than vegetative screening, best

---

<sup>1</sup> A small number of young, short Cypress, approximately 4, are on the Applicant's property directly adjacent to Highway One. (See Exhibit 6.) The unnatural effect of these few trees would be greatly amplified if the linear rows of a large number of Cypress in the middle of this open, grassy parcel were allowed as directed by the County-approved project design.



meet the intent the LCP Visual Resource policies for this particular portion of the San Luis Obispo coastline.

As proposed, the residence and barn are approximately 15'6" in height. Vegetative screening is proposed to help shield the residence from view of northbound travelers on Highway 1; however, the barn will be fully exposed to these viewers, and potentially in partial view of southbound travelers. It should be acknowledged that the applicant and the County have worked toward minimizing the visual impacts of the development itself, including the use of lower-house design, appropriate colors, and vegetative screening as a mechanism to shield the residence from public viewing areas. Nonetheless, these measures are not adequate to ensure that the extremely sensitive rural viewshed of the North Coast will forever be preserved to the maximum extent feasible. Every reasonable effort must be made to assure that new development in this area is truly subordinate to, and blended with the rural landscape. Again, although vegetation can be effective in some instances, when used in areas such as the vast, rolling hillsides and grasslands found along this stretch of coast, it may create an unnatural look and has an impact, equivalent to that of a structure, on the visual and scenic qualities of this area. The Commission also notes that the design and material used in the driveway to the building site as presently proposed will blend into the landscape during the dry periods of the year when the hills are golden brown but will be obtrusive during the season when the hills are green. (See Exhibit 6.) The use of a paving material, such as turf block, that allows for this seasonal color change may be worthy of consideration in a re-designed project.

There is no question that Visual Policy 4 of the San Luis Obispo LCP sets a high standard for protection of the extreme visual sensitivity of the North Coast. A traditional house design such as that proposed by the applicant does not readily blend in with, nor is it subordinate to, the rural character of the area. Thus, the project as currently proposed is not consistent with Visual Policies 1 and 4. However, alternative home designs are available that would at once minimize the intrusion of unnatural structures and vegetation into this environment and that also allow for reasonable single family living. For example, a berm of approximately 6 feet in height could be constructed on the applicant's parcel, behind which a residence could be hidden from view. Based on analysis of existing contours on and around the project site, a six-foot high berm with slopes of 10-15% would not significantly detract from the surrounding landscape and is feasible to construct on the site. In conjunction with a lowered site grade of approximately 4-5 feet, this berm height limit would allow for construction of a house of reasonable height while meeting the objective of subordinating development to the rural character of the area. Although landform alteration would be required, such alteration, if done appropriately to blend in with existing contours, would be preferable to unnatural vegetative screening.

More innovative and attractive home designs are also possible that would meet the LCP requirement of blending with the rural character of the North Coast. In particular, it is feasible to design and construct "earth-sheltered housing" that is essentially "bermed" houses (or banked with earth). A bermed structure may be above grade or partially below



grade, with outside earth surrounding one or more walls. Both types usually have earth-covered roofs, and some of the roofs may have a vegetation cover to reduce erosion.<sup>2</sup> The combination of natural, sod-roof treatments, and lowered grade is an innovative means of shielding development from critical viewsheds and building in complete accord with nature. Such techniques have been used along the California coast, including along the Big Sur Coast where the Commission has previously approved single family residences that incorporated earthen or vegetated roofs to minimize impacts to visual resources in this highly scenic area (Salomon (P-77-0581), Chase (P-77-0689), Gold (3-83-203)).

In light of the extreme visual sensitivity of the North Coast, the Commission finds that such innovative approaches to home design are necessary yet reasonable measures to meet the high standards of the County's LCP. Only through such design can the visual resources be "preserved and protected." Such designs also maximize the extent to which new development will blend in with the environment and be subordinate to the rural character of the North Coast unlike the design of the proposed project.

The Commission therefore finds that the project approved by the County does not comply with the visual resource policies discussed in the preceding paragraphs and the project must be denied. The Commission notes that feasible alternatives, some of which have been discussed in these Findings, exist for redesigning the proposed home that would result in a project that would meet the applicants objectives of locating a home on the site and would also comply with the applicable LCP policies

## **B. Agriculture**

The property is one of four small (3.5 to six acres) clustered parcels surrounded by large agricultural parcels (Hearst Ranch), all within the Agricultural land use category. This area has historically been used for grazing; however, fences now delineate these four smaller lots and prevent the movement of cattle onto these parcels. Because the applicant is proposing a residential (non-agricultural) use on agricultural land, Policy 3 for Agriculture is applicable.

***Policy 3 for Agriculture: Non-Agricultural Uses.*** *Non-agricultural development shall meet the following requirements:*

- d. The proposed use will result in no adverse effect upon the continuance or establishment of agricultural uses on the remainder of the site or nearby and surrounding properties.*
- e. The development...includes a means of securing the remainder of the parcel(s) in agricultural use through agricultural easements. As a condition of approval of non-agricultural development, the county shall require the applicant to assure that the remainder of the parcel(s) be retained in agriculture...by the following methods:*

<sup>2</sup> U.S. Department of Energy (Consumer Energy Information: EREC Fact Sheets) "Earth-Sheltered Houses."





***Agricultural Easement.*** *The applicant shall grant an easement to the county over all agricultural land shown on the site plan. This easement shall remain in effect for the life of the non-agricultural use and shall limit the use of the land covered by the easement to agriculture, non-residential use customarily accessory to agriculture, farm labor housing and a single-family home accessory to the agricultural use.*

Single family residences are a special, principally permitted land use on non-prime soils in the Agriculture land use category. Therefore, such a development is subject to special criteria regarding the siting of structures. In addition, because this is a non-agricultural use proposed in an area that has been, and is currently, used for cattle grazing, adequate measures to protect on-site agricultural activities, as well as those of the surrounding properties, shall be put into place.

Pursuant to CZLUO Section 23.04.024, the minimum size for grazing lands is 320 acres. Clearly, the five-acre parcel does not meet this minimum parcel size. Nonetheless, the LCP requires the applicant to record a deed restriction that prohibits future land divisions. and requires the applicant to grant an agricultural easement to the county over all agricultural land on the property, as required by Policy 3(e) for Agriculture. In addition, the disturbance envelope on the site should be limited to that necessary to support the residential use, so as to minimize impacts on adjacent agricultural lands.

Due to the limited width of the parcel, the residence will be in close proximity to adjacent agricultural uses. To minimize potential conflicts between surrounding agricultural operations and the proposed residential development, the applicant should record a "Right to Farm" statement consistent with Policy 3(d) for Agriculture as a component of future non-agricultural development proposed for the site. "Right to Farm" statements put current and future landowners on notice that the property and home are adjacent to land used, or planned to be used, for agricultural purposes and discloses the consequences of residing near existing and potential agricultural operations (e.g. dust, noise, odors, agricultural chemicals).

The County, in their action on this Coastal Development Permit application, failed to require the agricultural easement, the deed restriction relevant to future land divisions, and the recordation of the "Right to Farm" statement as directed by the LCP policies cited above. The County also did not analyze the effect of the proposed building site on adjacent agricultural uses as required by Policy 3 (d). For these reasons, the County approved project is inconsistent with the Agricultural Policies of the LCP. It is anticipated that these issues can be resolved through additional analysis, the consideration of alternative project designs, and the incorporation of additional permit conditions if necessary. Nonetheless, in light of the fundamental unresolved issues regarding inconsistency of the proposed project with the visual resource protection policies of the LCP, the project must be denied.



## C. Water

Applicable LCP Policy and Ordinance:

**Public Works Policy 1:** *New development shall demonstrate that adequate public or private service capacities are available to serve the proposed development.... Permitted development outside the USL shall be allowed only if it can be serviced by adequate private on-site water and waste disposal systems.*

**CZLUO Section 23.04.430:** *Development outside the urban service line shall be approved only if it can be served by adequate on-site water and sewage disposal systems...*

San Luis Obispo County LCP Public Works Policy 1 and CZLUO Section 23.04.430 require new development to demonstrate that adequate public or private service capacities are available to serve the proposed development. The proposed development is located outside the San Simeon Urban Services Line and thus must comply with the policies cited above. The Applicant has provided information regarding wells on adjacent property that indicates adequate water is most likely also available on the subject property in an amount sufficient to support the proposed development. In addition to this data on the water issue, the Applicant has submitted the results of test borings and soils analysis for the installation of the septic system that will be used for on-site waste disposal. The author of the report states that "*Based upon current County of San Luis Obispo Standards, the performance test results are adequate for effluent disposal by the leach line method in the area tested.*" (Mid Coast Geotechnical Inc., Report prepared by Dane Jensen, RCE and dated 11/30/00) Evidence of County Environmental Health Division approval of the well and septic system has not, however, been provided. Therefore, this aspect of the proposed development appears to be generally consistent with the cited LCP policies and ordinance; however, a redesigned project should include more definitive information regarding water availability on the subject parcel and County approval of the well and septic system.

## D. Archaeology

Applicable LCP Policy regarding Archaeological Resources:

**Policy 1 for Archaeology: Protection of Archaeological Resources.** *The county shall provide for the protection of both known and potential archaeological resources. All available measures, including purchase, tax relief, purchase of development rights, etc., shall be explored at the time of a development proposal to avoid development on important archaeological sites. Where these measures are not feasible and development will adversely affect identified archaeological or paleontological resources, adequate mitigation shall be required.*



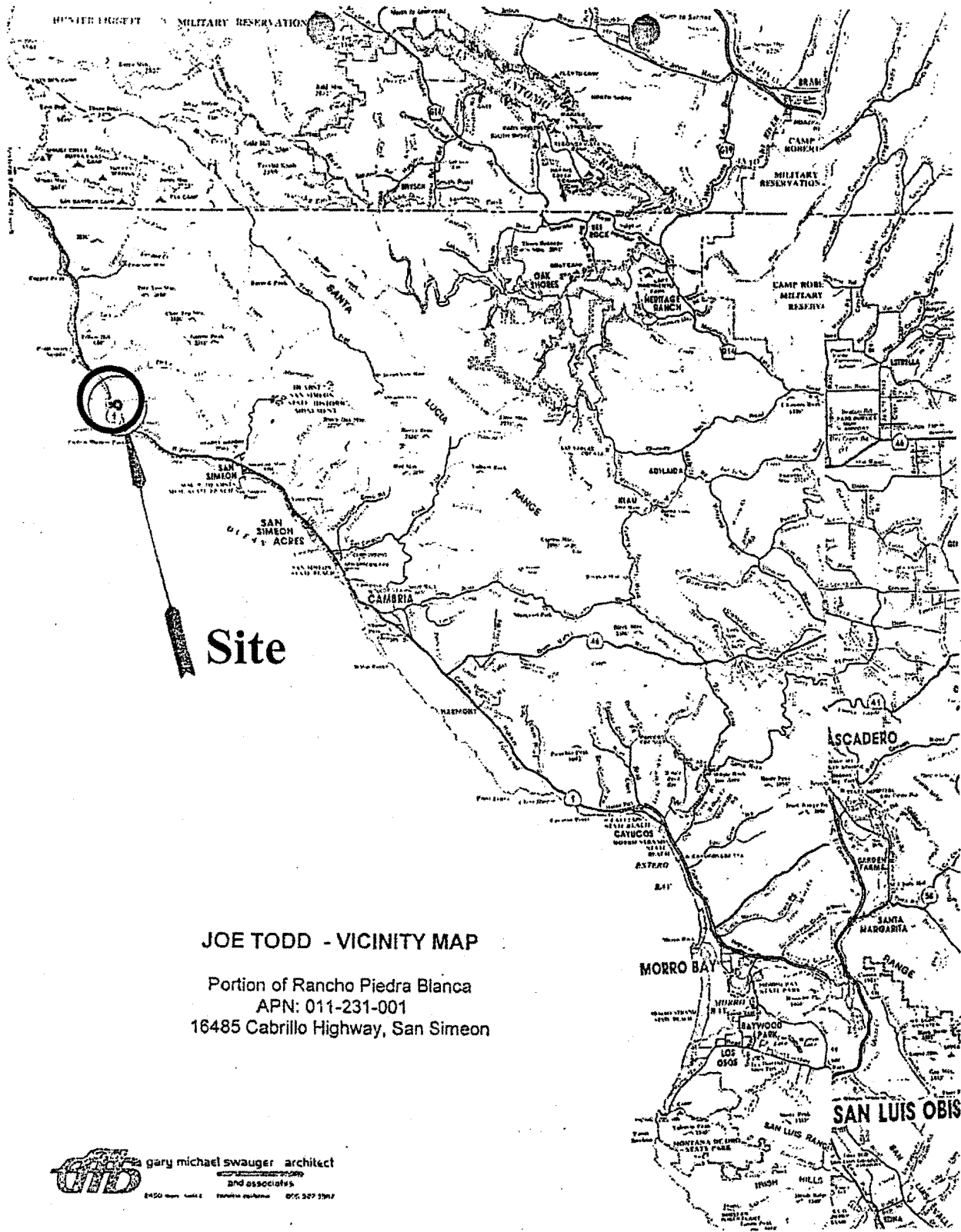
An archaeological surface survey was conducted for the parcel (Singer, October 12, 1999). Although no evidence of prehistoric cultural resources were noted during the survey, there are two known sites in the immediate area. The County did not adequately address the potential for archeological resources on the subject parcel because it did not require the Applicant to have a qualified archaeologist present to monitor all ground disturbing activities and prepare and implement mitigation measures, if any resources are found below the surface of the site. Therefore, a redesigned project should ensure that such monitoring will occur in order to be consistent with the LCP.

#### **CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)**

Section 13096 of the California Code of Regulations requires that a specific finding be made in conjunction with coastal development permit applications showing the application to be consistent with any applicable requirements of 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 which the activity may have on the environment. The Coastal Commission's review and analysis of land use proposals has been certified by the Secretary of Resources as being the functional equivalent of environmental review under CEQA. As discussed herein, a coastal development permit for the Todd residence cannot be approved because there are feasible, alternative designs for a home on this site that are substantially less environmentally-damaging. Furthermore, potential adverse impacts on adjacent agricultural lands have not been adequately analyzed or mitigated in compliance with CEQA requirements.



SAN LUIS OBISPO COUNTY DEPARTMENT OF PLANNING AND BUILDING



JOE TODD - VICINITY MAP

Portion of Rancho Piedra Blanca  
APN: 011-231-001  
16485 Cabrillo Highway, San Simeon



gary michael swauger architect  
and associates  
2450 Main Street, Suite 100, San Luis Obispo, CA 93401  
805.327.3367

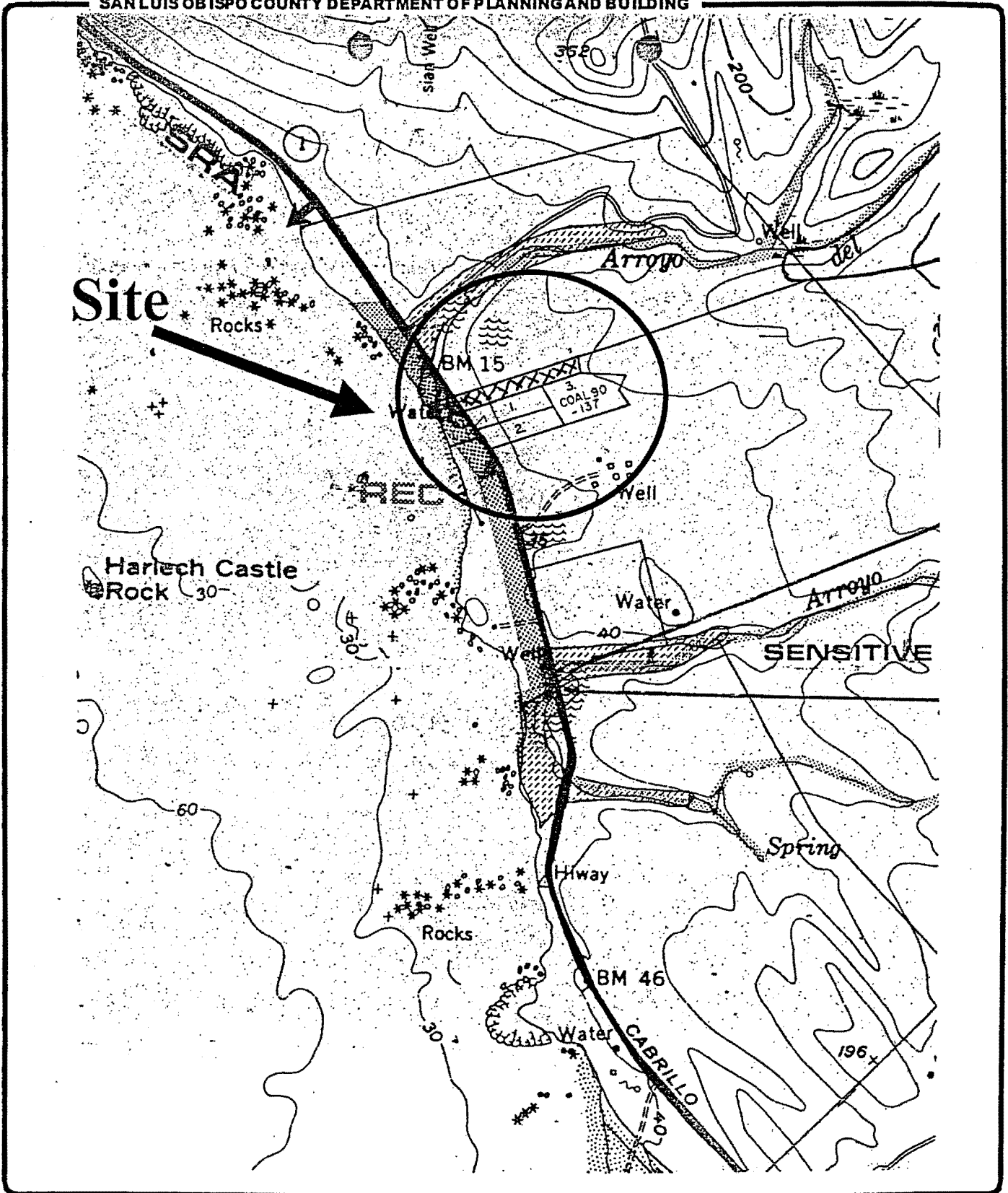
PROJECT

Minor Use Permit  
Todd - D990190P



EXHIBIT

Vicinity Map



PROJECT

Minor Use Permit  
Todd - D990190P



EXHIBIT

Land Use Category Map

REVISIONS	BY

PROPOSED RESIDENCE FOR

JOE TODD

16485 CABRILLO HWY

PIEDRAS BLANCAS, CA

COVER

gary michael swauger architect

and associates

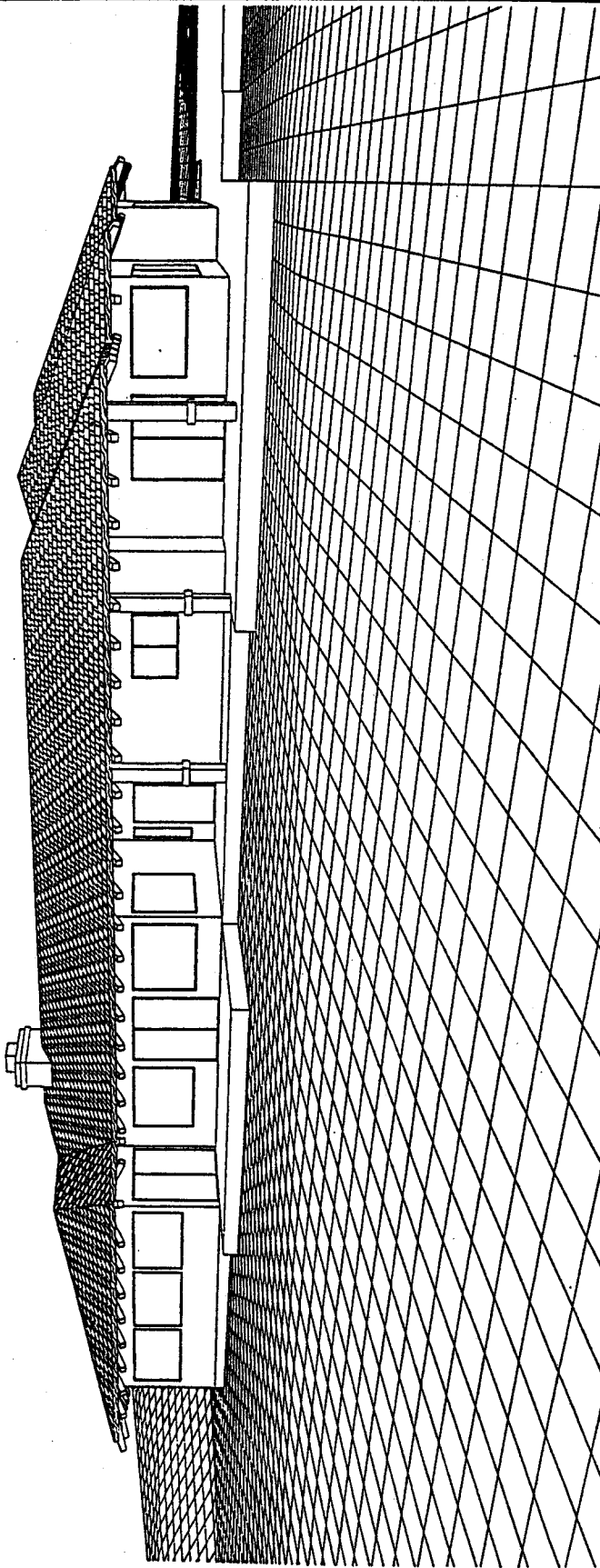
2400 north bluff & south bluff

LOS ANGELES, CA 90027-0007

2400 north bluff & south bluff

LOS ANGELES, CA 90027-0007

DATE	NOV 1999
BY	NO SCALE
PROJECT	16485 CABRILLO HWY
SHEET	1
TOTAL	6



PROPOSED RESIDENCE FOR:

JOE TODD

16485 CABRILLO HWY, PIEDRAS BLANCAS

© COPYRIGHT 1999 GARY MICHAEL SWAUGER, ARCHITECT

# LOT DESCRIPTION:

LOT: PORTION  
BLOCK: RANCHO  
TRACT: PEDRA BLANCA  
APN: 011-231-001  
LOT AREA: 4.37 AC

## SCOPE OF WORK:

CONSTRUCT NEW 1 STORY SINGLE FAMILY  
RESIDENCE WITH ATTACHED 3 CAR GARAGE,  
BARN, WELL AND SEPTIC SYSTEM

## BUILDING DATA:

TYPE OF CONSTRUCTION: V-N NON-SPRINKLED  
USE GROUP: AREA-SF MAX-SF OCC LOAD  
DWELLING: R-3 2700 N/A 10  
GARAGE: M 720 N/A 4

## BUILDING AREA:

LIVING	EXISTING	PROPOSED	TOTAL
MAN FLR	0 S.F.	2700 S.F.	2700 S.F.
TOTAL	0 S.F.	2700 S.F.	2700 S.F.
GARAGE	0 S.F.	720 S.F.	720 S.F.
BARN	0 S.F.	1120 S.F.	1120 S.F.
PATIO/PORCH	0 S.F.	1791 S.F.	1791 S.F.
PAVING	0 S.F.	17,232 S.F.	17,232 S.F.

## BUILDING HEIGHT:

	SFR	BARN
HIGHEST NATURAL GRADE ADJACENT TO STRUCTURE	99'-0"	100'-0"
LOWEST NATURAL GRADE ADJACENT TO STRUCTURE	95'-6"	98'-8"
AVERAGE NATURAL GRADE	97'-3"	99'-8"
MAXIMUM TOP OF STRUCTURE	119'-3"	121'-8"
ACTUAL TOP OF STRUCTURE	112'-10"	115'-2"

## MINIMUM SETBACKS:

GARAGE	RESIDENCE
FRONT: 25'	FRONT: 25'
SIDE: 30'	SIDE: 30'
REAR: 30'	REAR: 30'

## LOT COVERAGE STANDARDS:

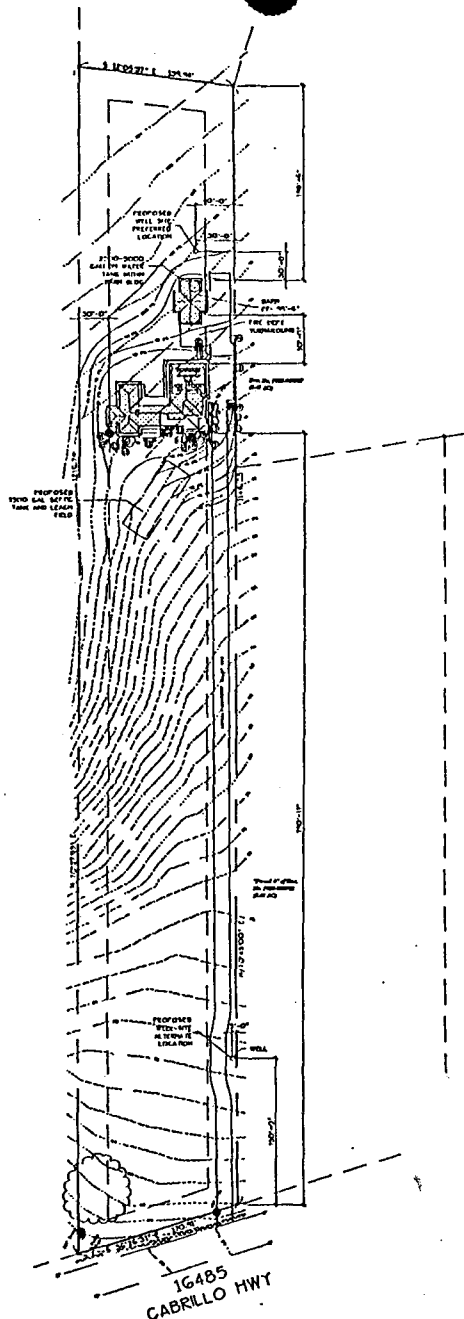
LOT SLOPE: 7.2	EXISTING	PROPOSED	TOTAL
ACTUAL FOOTPRINT	0 S.F.	4840 S.F.	4840 S.F.
ALLOW FOOTPRINT		N/A	
ACTUAL G.S.A.	0 S.F.	4840 S.F.	4840 S.F.
ALLOW G.S.A.		N/A	
ACTUAL HEIGHT	15'-7" A.N.G.		
ALLOW HEIGHT	22'-0" A.N.G.		

## GRADING INFORMATION:

CUT	HEIGHT	FEET
WITHIN FOOTPRINT	0-3	FEET
QUANTITY	100	CU.YD.
OUTSIDE FOOTPRINT	0-2	FEET
QUANTITY	900	CU.YD.
FILL	0	FEET
WITHIN FOOTPRINT	0	FEET
QUANTITY	0	CU.YD.
OUTSIDE FOOTPRINT	0-2	FEET
QUANTITY	1000	CU.YD.
SITE DISTURBANCE	42,500	SQ.FT.

## LEGEND

---	EXISTING CONTOUR
---	FINISH CONTOUR
---	WATER
---	SEWER
---	GAS
---	ELEC
---	CATV
---	PHONE
---	EDGE OF PAVEMENT
---	PROPERTY LINE
---	ONE STORY BUILDING
---	TWO STORY BUILDING
---	THREE STORY BUILDING
---	FINISH GRADE
---	TOP OF SLAB
---	TOP OF PAVEMENT
---	NATURAL GRADE
---	TOP OF 6" CURB
---	FINISHED SURFACE ELEV
---	TOP OF WALL
---	TOP OF GRADE ELEVATION



# PLOT PLAN

1"=200'

© COPYRIGHT 1999 GARY MICHAEL SWAUGER, ARCHITECT

REVISIONS	BY

Small text block containing project details and contact information.

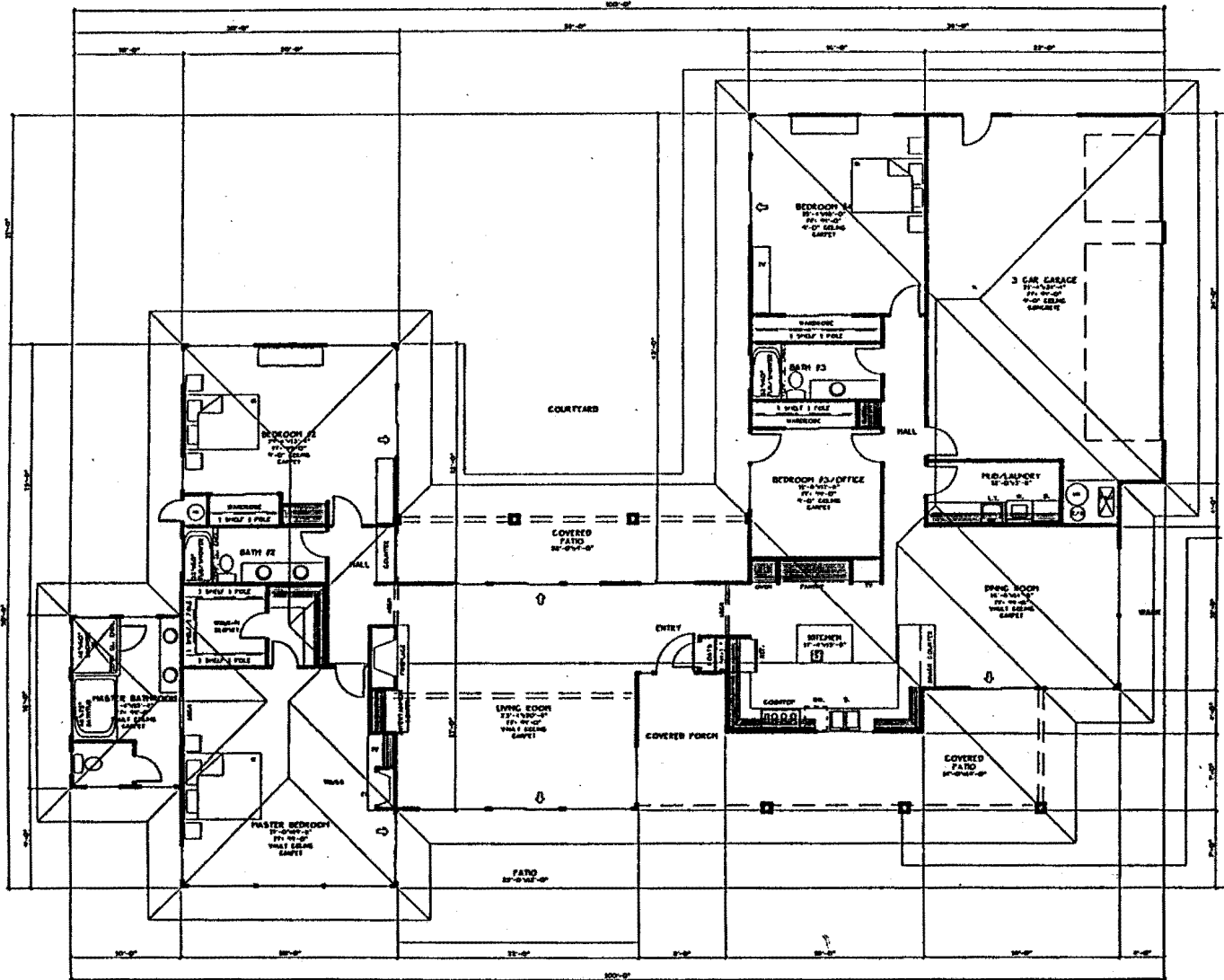
gary michael swauger architect  
and associates  
2440 MAIN SUITE 2  
SAN JOSE, CALIFORNIA 95128-3887  
408 227-3887



PROPOSED RESIDENCE FOR  
JOE TODD  
16485 CABRILLO HWY  
PIEDRAS BLANCAS, CA

PLOT PLAN

DATE	NOV 1999
DRAWN BY	G.M.S.
CHECKED BY	G.M.S.
SCALE	1"=200'-0"
SHEET NO.	99011.13
SHEET	2
OF 6 SHEETS	



# FLOOR PLAN

1/16"=1'-0"

© COPYRIGHT 1999 GARY MICHAEL SWAUGER, ARCHITECT

REVISIONS	BY

gary michael swauger architect  
and associates  
2440 MAIN ST. #200  
SAN FRANCISCO, CA 94102  
415.774.3887



PROPOSED RESIDENCE FOR  
**JOE TODD**  
16485 CABRILLO HWY  
PIEDRAS BLANCAS, CA

FLOOR PLAN

DATE	C.H.S.
DRAWN	C.H.S.
NOV 1999	
SCALE	1/16"=1'-0"
JOB NO.	99011.13
SHEET	3
OF 6 SHEETS	



REVISIONS	BY

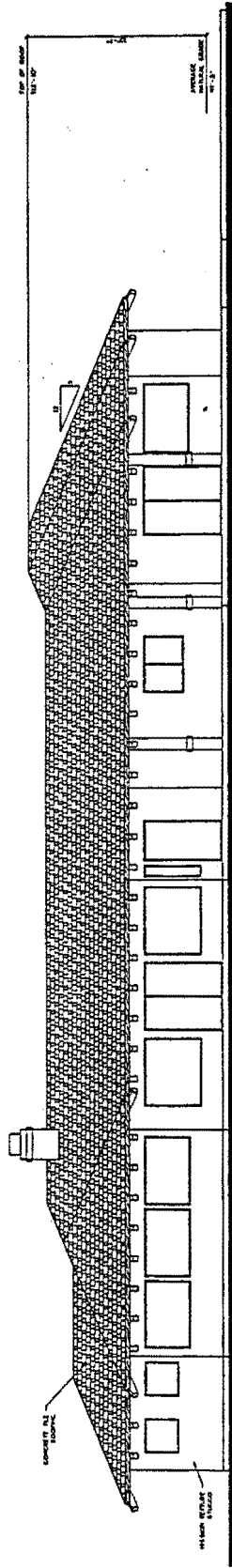
NOTES:  
1. ALL DIMENSIONS ARE IN FEET AND INCHES.  
2. FINISHES ARE TO BE DETERMINED BY THE OWNER.  
3. THE ARCHITECT IS NOT RESPONSIBLE FOR THE ACCURACY OF THE INFORMATION PROVIDED BY THE OWNER.  
4. THE ARCHITECT IS NOT RESPONSIBLE FOR THE ACCURACY OF THE INFORMATION PROVIDED BY THE OWNER.

gary michael swauger architect  
and associates  
2400 MICHIGAN BLVD. # 200  
SAN FRANCISCO, CA 94115-5007



PROPOSED RESIDENT FOR:  
**JOE TODD**  
16485 CABRILLO HWY  
PIEDRAS BLANCAS, CA

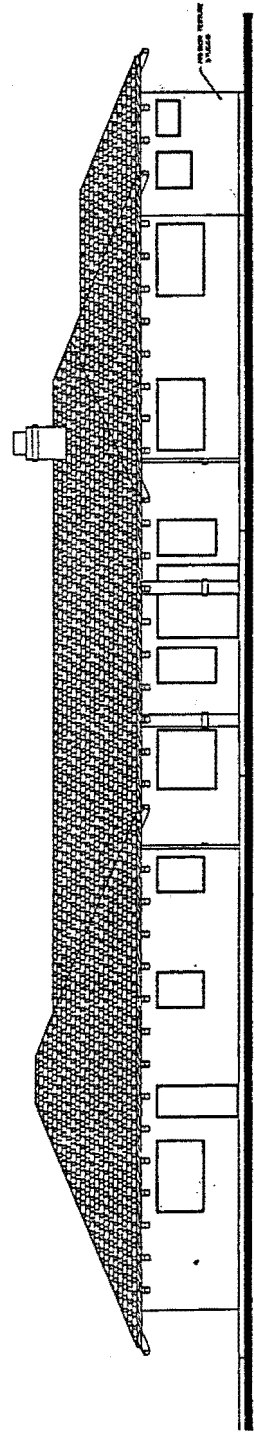
OWNER	G.M.S.
ARCHITECT	G.M.S.
DATE	NOV 1999
SCALE	1/16"=1'-0"
SHEET	9901133
OF	4
SHEETS	



FRONT

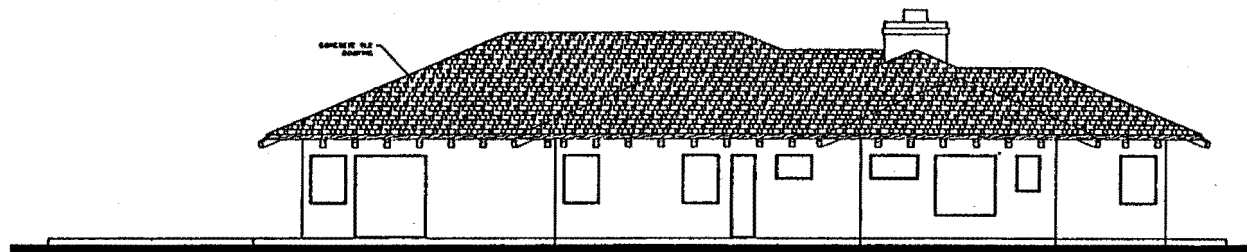
ELEVATIONS

1/16"=1'-0"



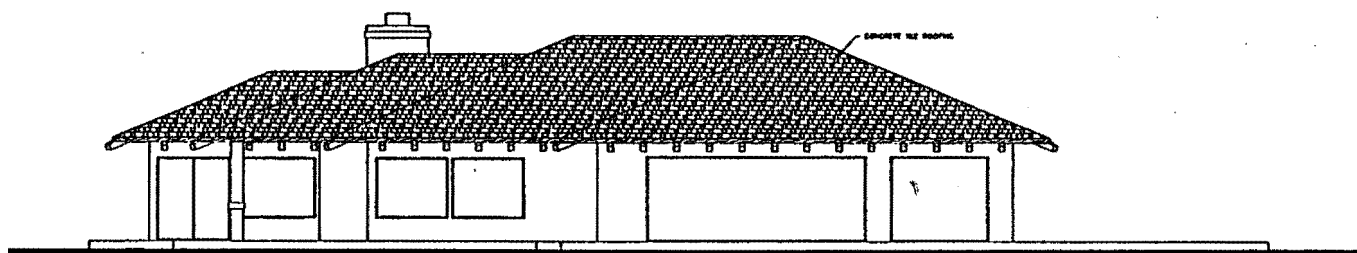
REAR

~~A-3-SLO-00-119 (Todd SFD)~~  
Exhibit 2 ( 5 of 6 )



LEFT

## ELEVATIONS

 $1/16'' \approx 1' - 0''$ 

**RIGHT**

REVISIONS	BY

[illegible]

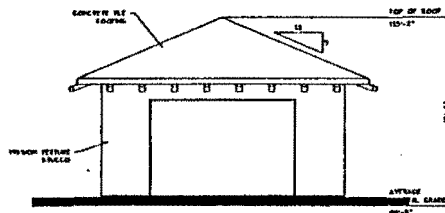
**gary michael swauger architect  
and associates**  
1450 main suite a    oakland california 94612-3337



**PROPOSED RESIDENCE FOR:**  
**JOE TODD**  
16485 CABRILLO HWY  
PIEDRAS BLANCAS, CA

### ELEVATIONS

DRAWN  
 C.M.S.  
 CHECKED  
 C.M.S.  
 DATE  
 NOV 1999  
 SCALE  
 1/16"=1'-0"  
 JOB NO.  
 99011.13  
 SHEET  
 5  
 OF 6 SHEETS

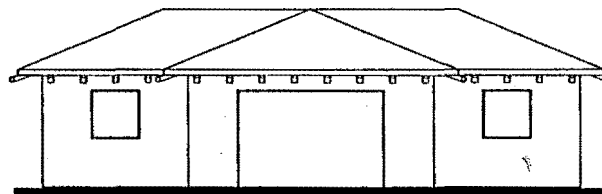


BARN-FRONT



# ELEVATIONS

1/16"=1'-0"



BARN-RIGHT

REVISIONS	BY

gary michael swauger architect  
and associates  
2400 main suite e  
san diego, california 92108  
619 527-3887

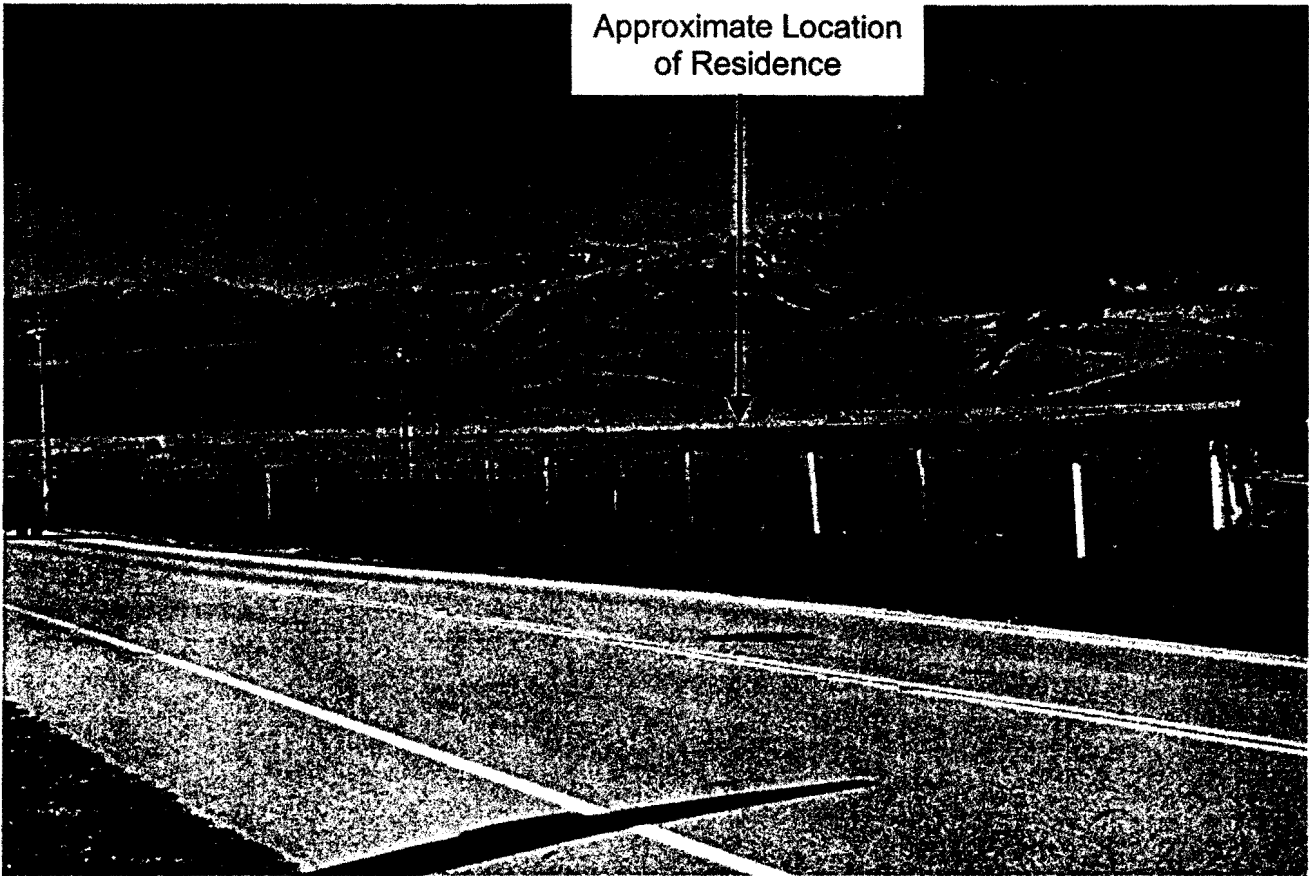


PROPOSED RESIDENCE FOR:  
JOE TODD  
16485 CABRILLO HWY  
PIEDRAS BLANCAS, CA

ELEVATIONS

DESIGN	C.M.S.
DRAWN	C.M.S.
CHECKED	C.M.S.
DATE	NOV 1999
SCALE	1/16"=1'-0"
PROJECT NO.	99011.13
SHEET	6

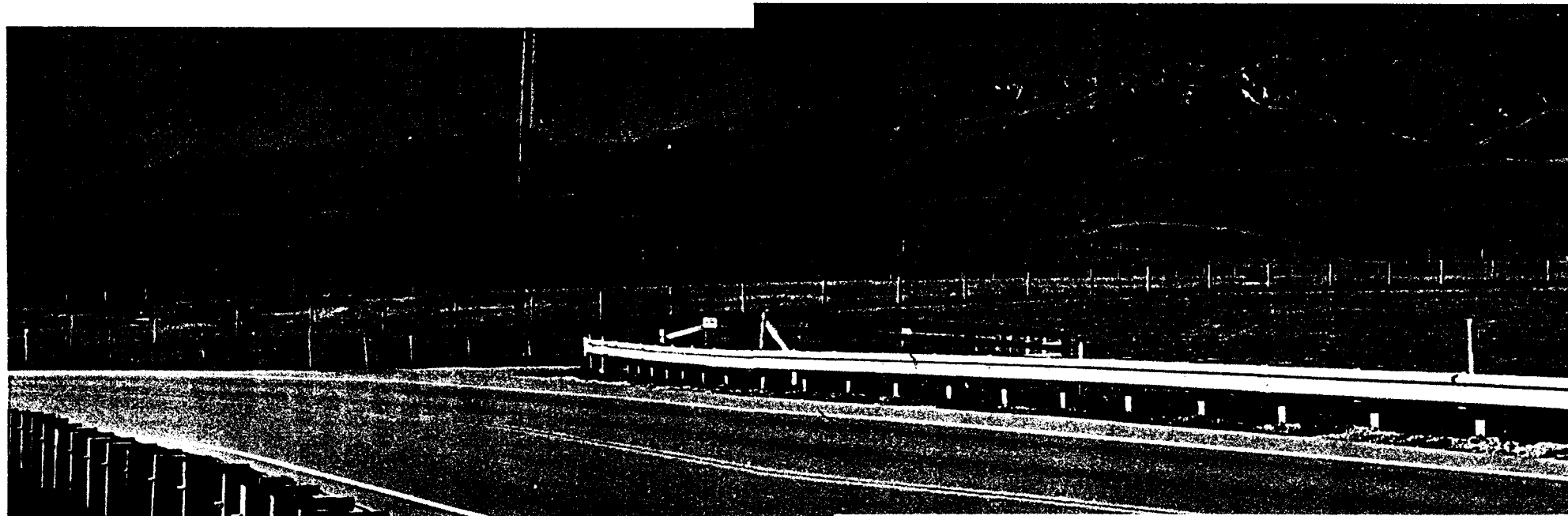
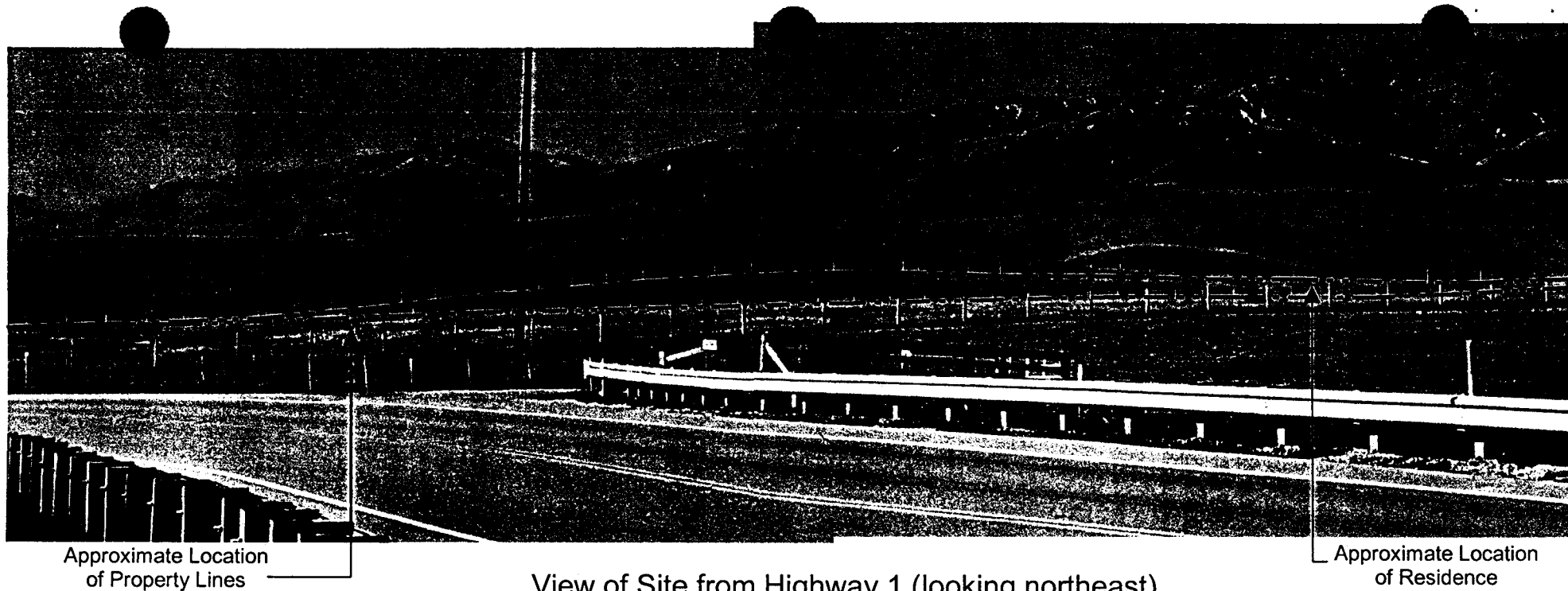
Approximate Location  
of Residence



Project Site as Viewed from Piedras Blancas Motel (looking northeast)



View of Piedras Blancas Lighthouse (Hwy 1) from Site (looking southwest)



**Exhibit B**  
**Conditions of Approval (D990190P)**

**Approved Development**

1. This approval authorizes the construction of an approximately 2,980 square foot single family residence, 720 square foot attached garage, 1,120 square foot barn and water well and septic system
2. Site development shall be consistent with the approved site plan, floor plans and elevations. **The maximum height of the project is 15' 7" above average natural grade.**

**Visual Resources**

3. **At the time of application for construction permits, the applicant shall submit a revised color board showing exterior colors and surface materials for review and approval. Colors shall minimize the structure massing of new development by reducing the contrast between the proposed development and the surrounding environment. Colors shall be compatible with the natural colors of the surrounding environment, including vegetation, rock outcrops, etc.. Darker, non-reflective, earth tone colors shall be selected for walls, chimneys etc. and darker green, grey, slate blue, or brown colors for the roof structures.**
4. **At the time of application for construction permits, the applicant shall clearly delineate the location and visual treatment of water tanks on the project plans. All water tanks shall be located in the least visually prominent location feasible when viewed from Highway 1. Screening with topographic features, existing vegetation or existing structures is encouraged. If the tank(s) cannot be screened, then the tank(s) shall be a neutral, non-contrasting color, and landscape screening shall be provided.**

**Landscaping**

5. **At the time of application for construction permits, the applicant shall submit a revised landscape, irrigation, landscape maintenance plans and specifications to the Department of Planning and Building for review and approval in consultation with the Environmental Coordinator. The landscape plan shall provide vegetation that will adequately screen the new development, including buildings, water tanks, etc., when viewed from Highway 1. The plan shall include an analysis by a qualified individual (e.g. qualified nurseryman, landscape architect, etc.) that considers the specific condition of the site including soil, exposure, temperature, moisture, and wind. Specific plant species recommended shall consider all environmental factors as well as screening goals.**

**County's Conditions**  
**Exhibit 4 (1 of 2)**

6. Prior to final inspections, the applicant shall install (or bond for) the landscaping as recommended in the approved landscaping plan.

Archaeology

7. During ground disturbing construction activities, the applicant shall retain a qualified archaeologist, approved by the Environmental Coordinator, to monitor all earth disturbing activities, per the approved monitoring plan. If any significant archaeological resources or human remains are found during monitoring, work shall stop within the immediate vicinity (precise area to be determined by the archaeologist in the field) of the resource until such time as the resource can be evaluated by an archaeologist and any other appropriate individuals. The applicant shall implement the mitigations as required by the Environmental Coordinator.
8. Upon completion of all monitoring/mitigation activities, and prior to occupancy or final inspection, whichever occurs first, the consulting archaeologist shall submit a report to the Environmental Coordinator summarizing all monitoring/mitigation activities and confirming that all recommended mitigation measures have been met.

County's Conditions  
Exhibit 4 (2 of 2)

# EXHIBIT A

APN(S): 011-231-002.003.004.005 PTNS

PROJECT NO: COAL 90-137

PARCEL NO: 1 (PARCELS A&B)

Todd  
Parcel

MR. EVANS  
7/15/20

ENVIRONMENTALLY  
SENSITIVE  
AREA

Well

BLANCO

PIEDRA

RANCHO

HWY 1

PACIFIC OCEAN

NOTE: INDICATES 10 CAL. MONITORING  
POINTS TO BE PLACED FOR  
VISUAL MONITORING WITH DRIP  
IRRIGATION

COAL 90-137 Exhibit  
Exhibit 5



JAN 25 2001

CALIFORNIA  
COASTAL COMMISSION  
CENTRAL COAST AREA**Visual Analysis for the Todd Residence**

January 23, 2001

**Overview:**

This visual analysis was conducted to determine the potential visibility of the proposed residence and barn from Highway 1 located in the general area of the Piedras Blancas Motel. On December 28, 2000, a field investigation was conducted. Pylons were set up at the three visible corners of the proposed structures and baseline photographs were taken. The applicant's residence and barn were then simulated onto the photographs using various computer programs. The applicant's proposed landscaping and berming were added to these simulations to present the graphics seen below. The photo-simulations show the trees as they would look five years after planting when they will be 15 to 20 feet high depending on the species. (See Appendix A for a more detailed description of the methodology used.)

**Context:**

The applicant's site is narrow: 160 x 1,095 feet. The structures are proposed at the rear of the site, 791 feet from Highway 1. The residence is proposed to be 16 feet high and the barn is proposed to be 15 feet high. At this location (see Figure 1: Site Plan with key viewing areas), even without vegetative screening, the structures cannot be seen by southbound travelers as they are hidden by a small hill. When viewed directly from the west, the 20-foot-high cypress trees growing adjacent to the highway will generally hide the structures, though there is a glimpse possible at Key Viewing Area (KVA) 5. The primary concern will be for the northbound travelers who have several opportunities to view the site as the highway meanders along the coast. However, the proposed structures will not project anywhere near the scenic backdrop ridgeline of the Santa Lucia Range.

Travelling from the south, northbound viewers will always see the proposed development site within the context of existing development. Excluding the Piedras Blancas Lighthouse, which is approximately two miles south, the viewer will first see a residence on the coastal side, then a trailer campground, and finally the Piedras Blancas Motel, located approximately 100 feet south of the entry to the Todd property. All of these structures with vegetation are on the ocean side of the viewer and in the primary cone of vision. On the inland side, there is a small farm complex generally screened by mature Monterey Cypress trees. However, two water tanks located on a small hill to the right of the complex are visible. In all cases, the development proposed by the Todds will be centered between these existing developments. Any vegetation planted by the Todds will be seen within the context of the trees surrounding the farm complex as well as the cypress trees in front of the motel, and existing vegetation on the front of the project site. The context of the proposed residence is shown in *Figures 2 and 3*. The colors proposed for the Todd residence are muted browns and beiges as seen on the copy of the color board submitted to the County of San Luis Obispo during the approval process, *Figure 7*.

Applicant's Visual Analysis  
Exhibit 6 (1 of 16)

**Evaluation:**

The potential to view the site was determined by driving the length of Highway 1 and choosing KVAs which best represented the combination of views toward the site. Figure 1: Site Plan, identifies these KVAs. Figures 4 through 6 show the photographic views from KVAs 3, 4 and 5 which were considered most representative of potentially significant views of the site. Table 1 on the next page summarizes the technical information, such as distance from the viewer, length of view, and percentage of horizontal view occupied by the project. All photographs were taken with a 50mm lens, which, for 35-mm film, is the same as the typical human eye. All photos were also taken from the same height as the typical person seated in an automobile.

In the three photo-simulations, the first photograph (Photo A) shows the pylon position so that the viewer can see the location of the proposed structures. The second photo (Photo B) shows the project in place without any berms or vegetative screening. The final photo (Photo C) shows the view as would be seen after the applicant's proposed vegetative screens have been in place for five years. In addition to using the field pylons, to insure accuracy Cannon Associates utilizes Adobe Photoshop and 3D StudioViz to render the simulations.

**KVA 1:** (Not simulated.) This location will be the first time it is possible to view the project when driving north on Highway 1. The project site becomes visible just above the fence on the right and will be seen in the distance approximately 5,000 feet away, with the farm on the right and the residence, campground, motel complex on the left. The view between KVAs 1 and 2 lasts up to 25 seconds, and then disappears as the vehicle drops down to a small creek and bridge.

**KVA 2:** (Not simulated.) This location will be the last from which the project site is visible prior to descending to the creek mentioned above. The view will disappear for 20 seconds until the vehicle again rises to the plateau.

**KVA 3:** At this location, the project site is in view between KVAs 3 and 4 up to 24 seconds (assuming a 50 mph speed). The context is the same as in the previous KVAs, with the motel complex on the left and the mature stand of trees around the farm on the right.

**KVA 4:** This location is directly opposite the motel and the farm complex. The primary view begins to sweep to the left (seaward) as Highway 1 heads toward the coast.

**KVA 5:** Located to the left of the driveway entry, this view will be 90 degrees to the direction of travel and can be glimpsed for less than a second. However, the project site is not in the primary cone of vision. It shows the mature trees that will remain on either side of the driveway. The photo-simulation also shows the applicant-proposed berm/hedge of cypress trees which will completely obscure the structures.

**KVA 6:** (Not simulated.) From the north, the project is not visible as it is hidden behind a low hill to the left of the southbound viewer.

**Table 1**  
**KVA Characteristics**

KVA	Distance from Site	Primary Cone of Vision	Percent of Horizontal View	Photo Simulation	Comment
1	5,000 ft.	yes	4.6%	no	not visible as mitigated
2	4,500 ft.	yes	5.3%	no	not visible as mitigated
3	3,500 ft.	yes	6.5%	yes	not visible as mitigated
4	1,800 ft.	yes	18.3%	yes	not visible as mitigated
5	780 ft.	no	16.6%	yes	not visible as mitigated
6	2,000 ft.	n/a	n/a	no	not visible as mitigated

- Site visible from KVA 1 to 3 for 25 seconds at 50 mph\*.
  - Site visible for 1,800 feet centered on KVA 4 for 24 seconds at 50 mph\*.
- \*50 mph equals 72/seconds/mile.

**Comments:**

The photographs in Figures 2 and 3 were taken to demonstrate the context within which the proposed residence and barn will be seen.

Figure 2 photo A: shows the Piedras Blancas Motel. These structures are located less than 1,000 feet south of the entry to the Todd site.

Figure 2 photo B is taken from the front yard of the motel toward the proposed residence. The arrows indicate the location of the pylons showing the extent of the residence and barn.

Figure 3 photo A is taken from Highway 1 opposite the motel toward the farm and mature Monterey Cypress tree windrows to the east. The main ridge of the Santa Lucia Range is on the horizon.

Figure 3 photo B shifts the view slightly left to include the Todd site. The arrows emphasize the location of the pylons (indicating the project location). The proposed buildings will be lower than the top of the pylons - 15 feet versus the pylon height of 18.5 feet.

In summary, the context of the project site when seen from the south will always be within the context of other structures and planting.

Figures 4 through 6 show the existing view as seen from the critical viewing areas, with pylons locating the proposed residence and barn. The photographs from the KVAs designated with a "b" show the applicant-proposed screening and berms in place. The photos designated with a "c" show the residence and barn after the proposed vegetative screening has been in place for five years. This screen is proposed to be a series of spruce, cedar and cypress trees. The trees will be 15 gallon or box specimens planted to provide maximum initial screening and will typically be 10 to 12 feet in height at the time of planting. Each year, they will grow 12 to 18 inches vertically and fill out to form a dense mass of greenery completely screening the structures within five years.

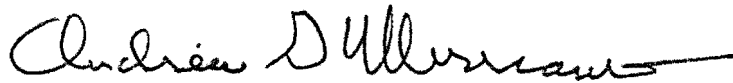
The comments below apply to KVAs 1 through 4 since they are all similar, except in the relative distance between the viewer and the proposed residence. In all cases, the landscape screen will function the same. While the house and barn are clearly visible in the unscreened version, they do not dominate the view. When the applicant-proposed landscaping is simulated, the structures are hidden. In fact, for KVAs 1, 2 and 3, this landscaping screen will be seen as an extension of the existing cypress trees adjacent to the existing farm. This relationship is demonstrated in the photo simulation for KVA 3.

KVA 5 is different in that it provides a glimpse of the structures lasting approximately one second perpendicular to the direction of travel. The character of the house is shown in Photo B. The applicant-proposed low berm and row of cypress trees would completely shield the structures from this viewing area after they are in place for three to five years. The applicant also proposes to color the driveway material an earthen brown which will further reduce the visual impact to the traveler.

In conclusion, with the proposed landscaping, the proposed structures will not be visible to the travelers along Highway 1. Furthermore, the vegetative screen will always be seen within the context of the existing adjacent cypress trees on the farm to the east, the motel to the west, and at the trees at the entry to the north. If the proposed trees are maintained, it is my opinion that no further planting or mitigation measures are warranted or would be effective. The project will be invisible to the casual visitor or traveler.

This evaluation was prepared by Andrew Merriam, an architect with over 20 years experience in this field. Mr. Merriam has prepared over 60 visual analyses ranging from single-family residences to shopping centers and offshore oil platforms.

Prepared by,



Andrew G. Merriam, AICP  
Principal, Director of Planning

## Visual Appendix A

### Overview

The following discussion is provided to familiarize the reader with the multiple parameters used in conducting a visual resource analysis for a project such as the Todd Residence Visual Analysis.

Impacts to a visual resource are a function of the visual character of the resource itself, the level of public interest and concern over changes in the quality of the resource, and the frequency with which the resource is viewed.

Visual impact analyses have subjective as well as objective components. It is recognized that any analysis will vary somewhat depending on the views and experience of those conducting the analysis, whether as a viewer or as a consultant. Furthermore, the environmental setting and perception of the proposed project may be subject to a wide range of opinion, probably more than any other environmental issue area.

### Methodology and Criteria

As discussed above, visual impacts are the function of three independent parameters: 1) the visual character of the resource itself; 2) the level of public interest and concern over changes in the quality of the resource; and 3) the frequency with which the resource is viewed.

There have been many attempts to develop objective criteria and clearly identify where subjective evaluations are made. Items 1 and 3 are relatively objective and can be defined with baseline photographs and statistics, while item 2 is subjective and deals with the visual quality and sensitivity of the public to the changes proposed by the project. The methodology used in this study is refined from the Bureau of Land Management and the U.S. Forest Service documents and is consistent with the visual component of major EIRs and EISs prepared for the Central Coast area. (These refinements have been made to allow more precise evaluation of discrete site specific impacts in more urbanized areas rather than evaluating, for example, the effects of logging a mountain side.) The methodology considers the following:

Visual Character - the landforms, water, vegetative patterns, and existing man-made modifications that give an area its distinguishing qualities. This component is relatively objective and is recorded in the baseline photos of an area prior to imposing the proposed development.

Visual Quality - the subjective feeling generated in the eye of the viewer. It identifies the overall attractiveness of an area and its capability of being preserved when new features are introduced.

Exhibit 6 (6 of 16)

Visual Sensitivity Level - evaluates the public's concern, expectations and viewing frequency. Where appropriate, the length of viewing time is provided in the individual site evaluation.

#### Evaluation Process

The visual evaluation method used analyzes the impacts of the proposed development as shown on the site plan. An image of the proposed development is superimposed on the baseline photographs in order to evaluate the impact from Key Viewing Areas.

The following factors were used to characterize and assess the visual sensitivity level of the project and evaluate its significance:

Proximity - a measure of the distance to a project component from a designated viewpoint, as well as from other existing facilities or other elements in the landscape.

Relative Scale - a description of the perceived size of a project component relative to other existing elements within the observer's field of vision.

Duration of Visibility - an estimate of the period of time during which the project component is visible to moving observers (e.g., from vehicles on an adjacent road.)

Visual Compatibility - an assessment of the physical properties of the project component, including height, mass, orientation, color, and materials. These attributes are reviewed for their compatibility with the existing character of adjacent elements in the visual landscape.

Visual Expectation - evaluates the way the viewer may subjectively react to changes in the landscape based on previous or anticipated experience.

Obtrusiveness - examines the degree to which the project component competes for visual attention in its landscape context with other existing landscape elements. The component's relationship to important landmarks or key visual orientation points is also considered.

The first four factors are used to determine the character and level of impact. The last two factors, visual expectation and obtrusiveness, are subjective measures of people's response to the impact. An impact is considered significant only if the effect is moderate (e.g., one which results in a long-term intrusion into the landscape or a short-term action or disruption that is especially obtrusive or highly visible and disruptive to the visual context).

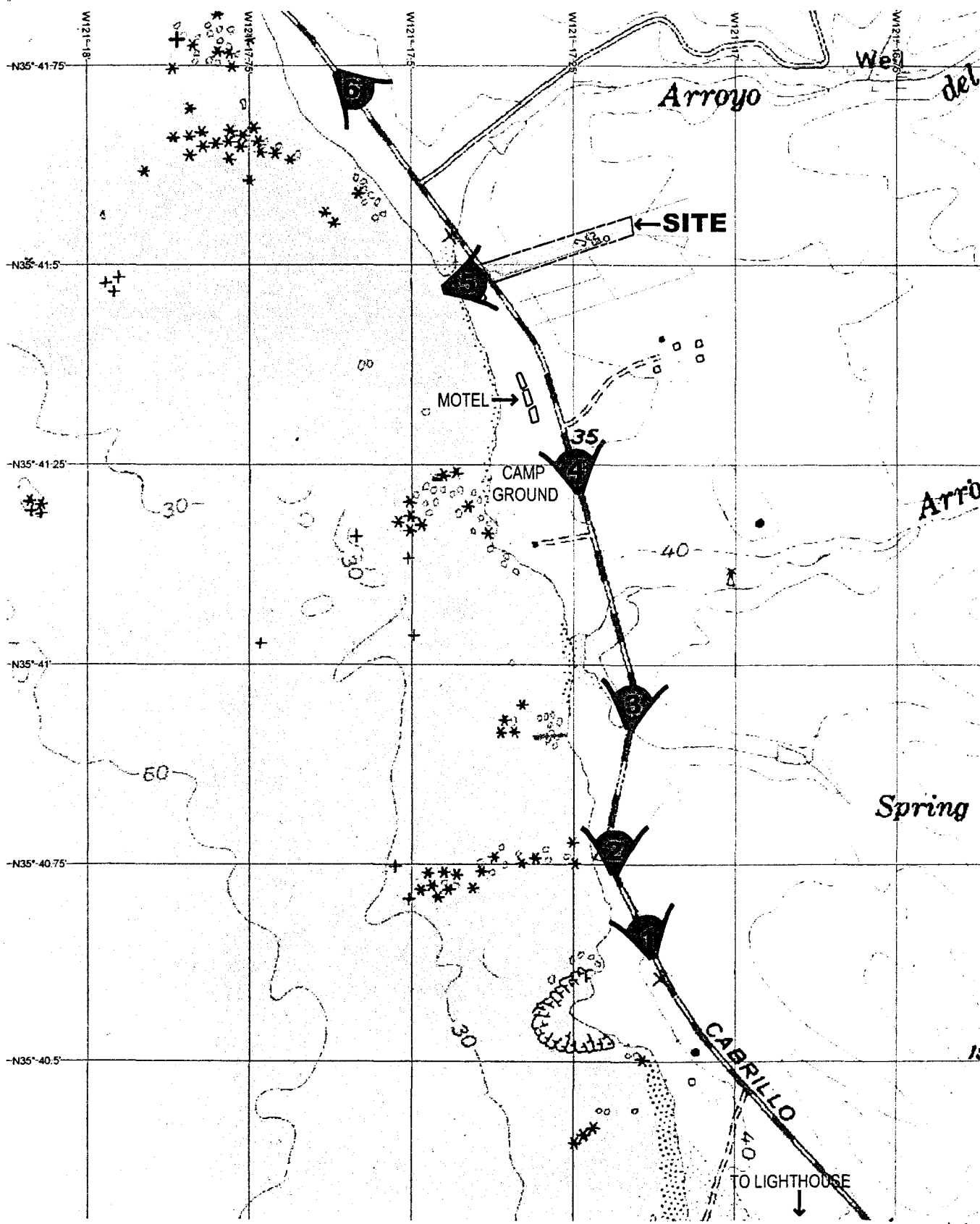
Exhibit 6 (7 of 16)

Definitions

Primary cone of vision for the automobile travelers: The cone of vision is generally considered to be 30 degrees in a circle about the line of travel. Horizontally, however, since the head may be rotated easily from side to side, the primary viewing angle is widened to be 45 degrees each side of the direction of travel. The number of passengers who look out at a 90-degree angle or from the rear window is considered negligible in an analysis of obtrusive elements within a non-urban setting.

Key Viewing Areas: These are defined as those areas where views of the proposed project may be seen by a significant number of viewers within the context of the methodology described in the introduction to this report.





**Cannon**  
ASSOCIATES

**TODD - VISUAL ANALYSIS**  
(LOCATION: Near Piedras Blancas Lighthouse)


 Photo Key Viewing Area  
KVA MAP  
FIGURE 1

Exhibit 6 (9 of 16)

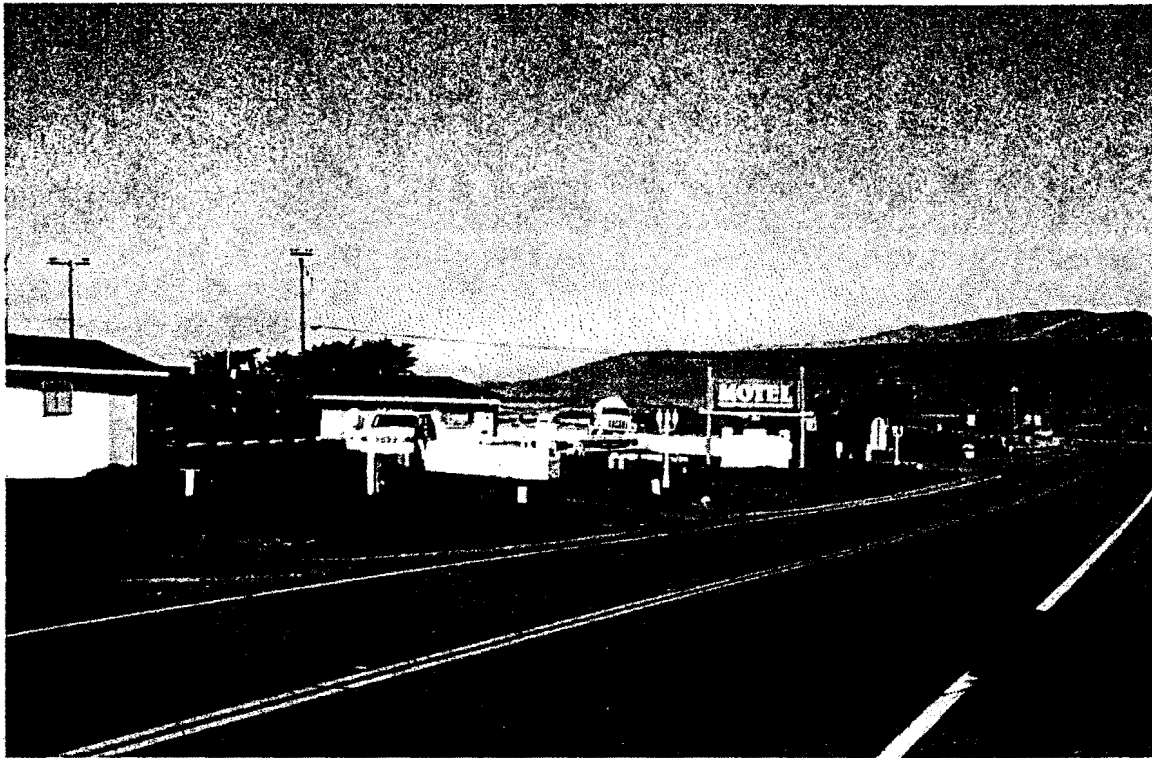


Photo A: PIEDRAS BLANCAS MOTEL



Photo B: LOCATION OF PROPOSED RESIDENCE AND BARN

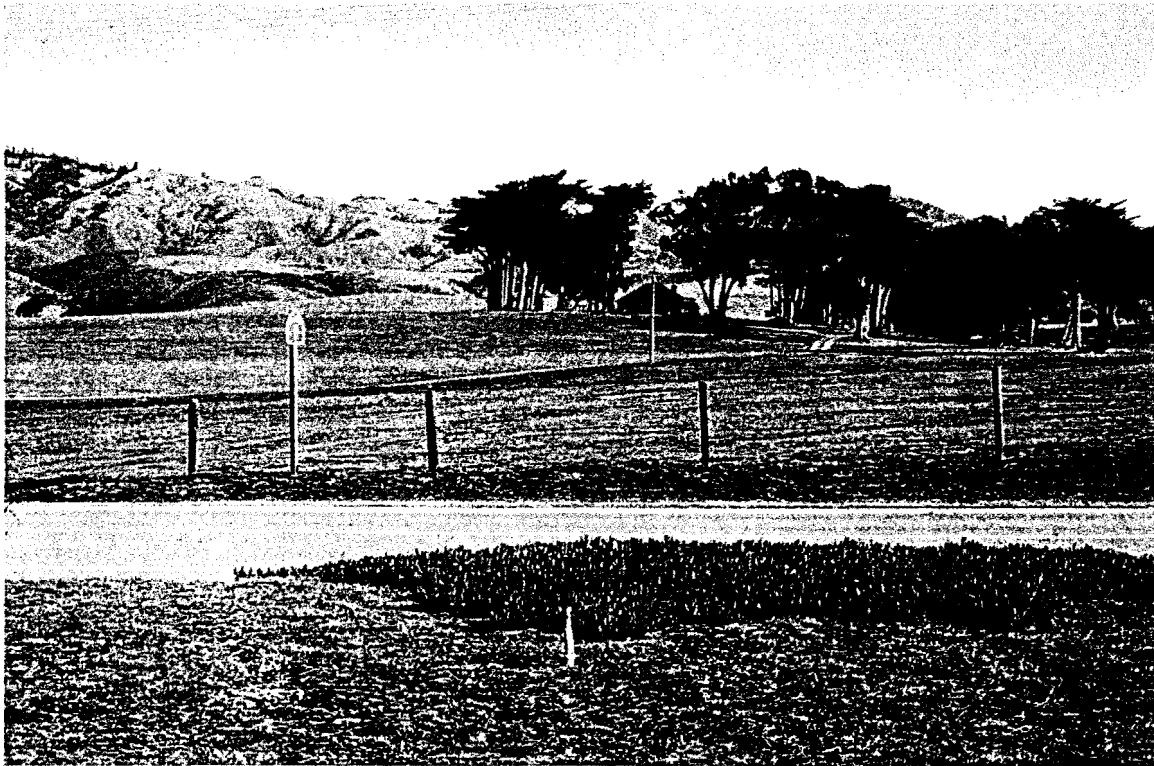


Photo A: ADJACENT FARM COMPLEX



Photo B: LOCATION OF PROPOSED RESIDENCE

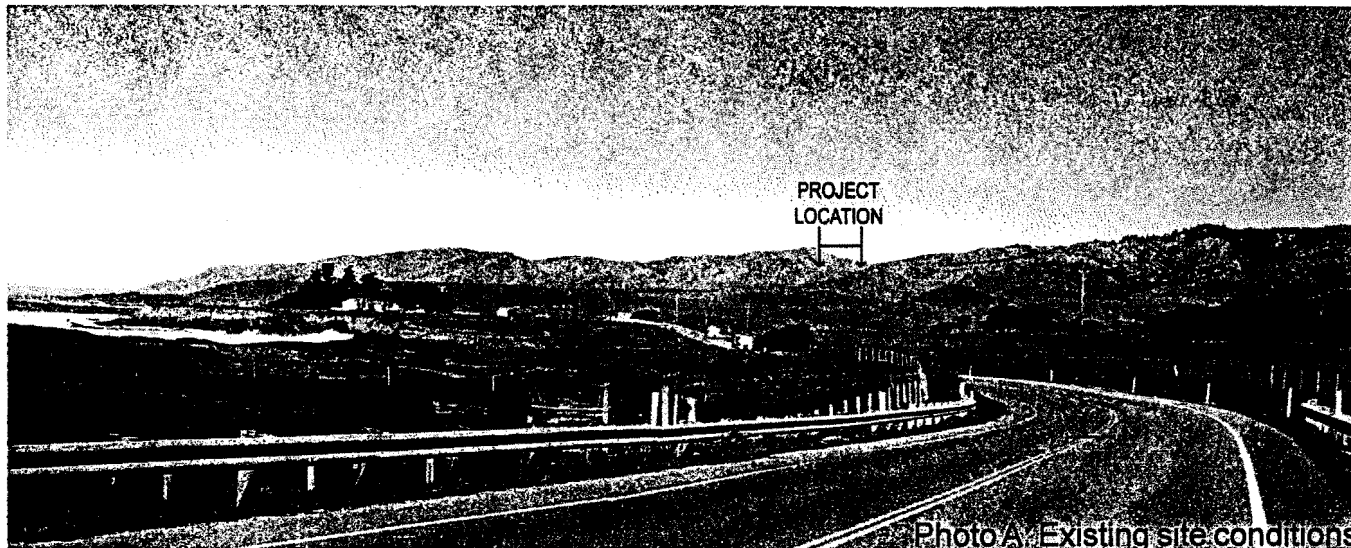


Photo A: Existing site conditions

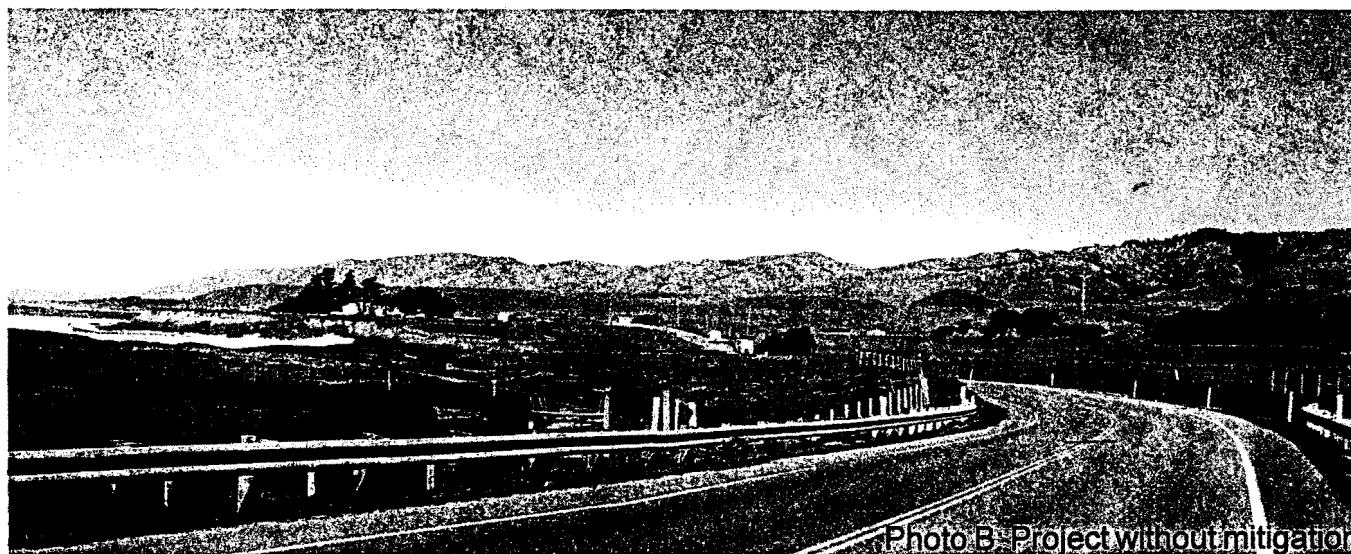


Photo B: Project without mitigation

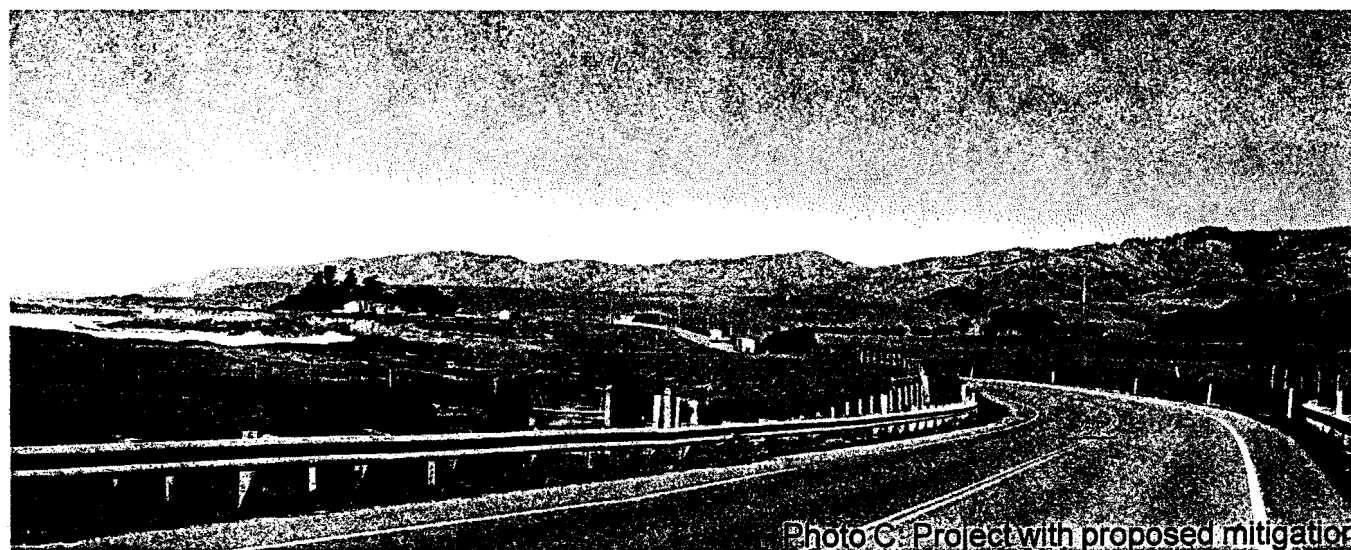


Photo C: Project with proposed mitigation

**Cannon**  
ASSOCIATES

**TODD - VISUAL ANALYSIS  
PHOTO SIMULATION**

NORTHBOUND HWY 1  
**KVA**  **FIGURE 4**

Exhibit 6 (12 of 16)



Photo A: Existing site conditions

Photo B: Project without mitigation



Photo C: Project with proposed mitigation

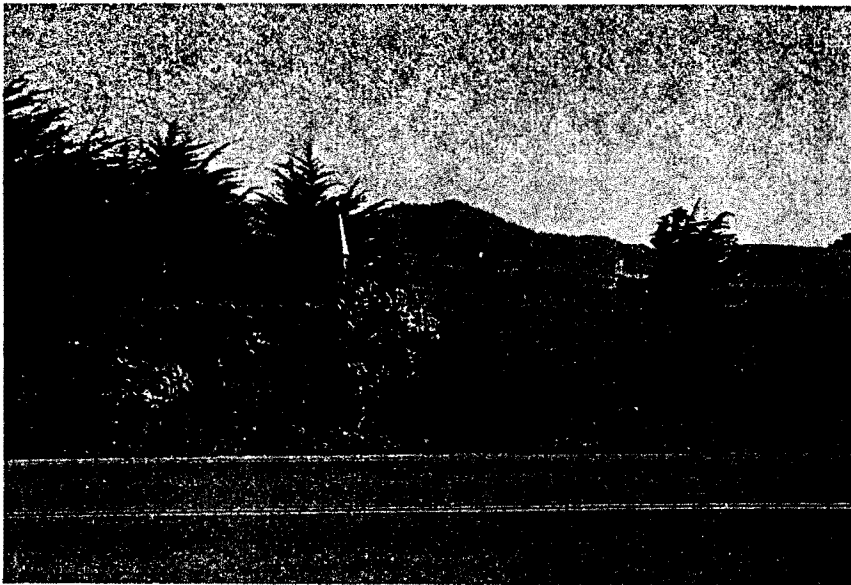


Photo A: Existing site conditions

Photo B: Project without mitigation



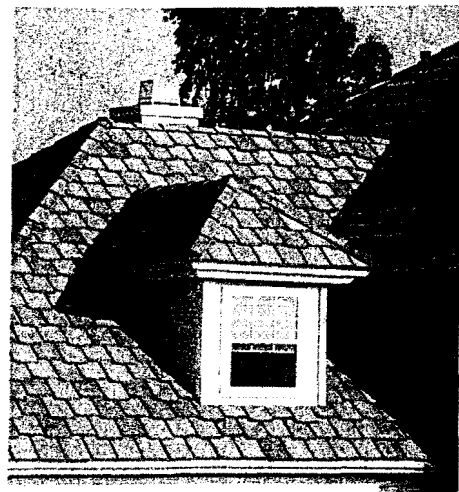
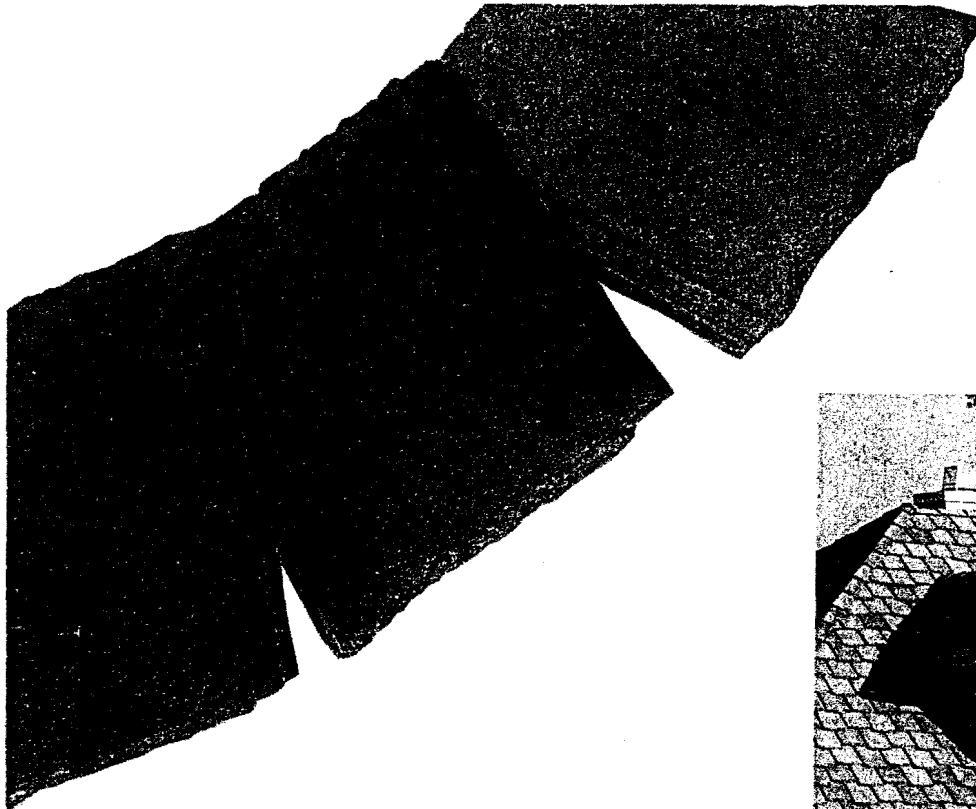
Photo C: Project with proposed mitigation



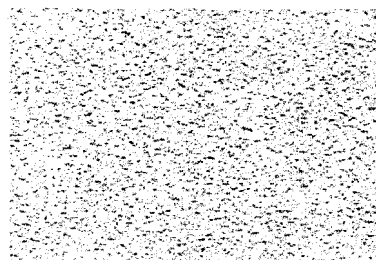
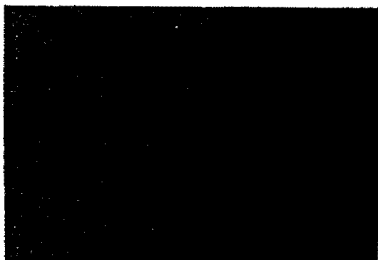
**TODD # D990190P**

16 J Cabrillo Highway Piedras Blancas

**COLOR BOARD**



ROOFING: Pioneer's *Old World* Concrete Tiles  
w/ cobbled edge for greater dimension &  
staggered layout to break up straight roof lines  
in "Ironwood" tri-color blend



TRIM:

Sherwin Williams  
Terrace Brown # SW 2042

STUCCO:

La Habra Products  
# X-24, Santa Fe

**TODD - VISUAL ANALYSIS**

COLOR BOARD  
FIGURE 7

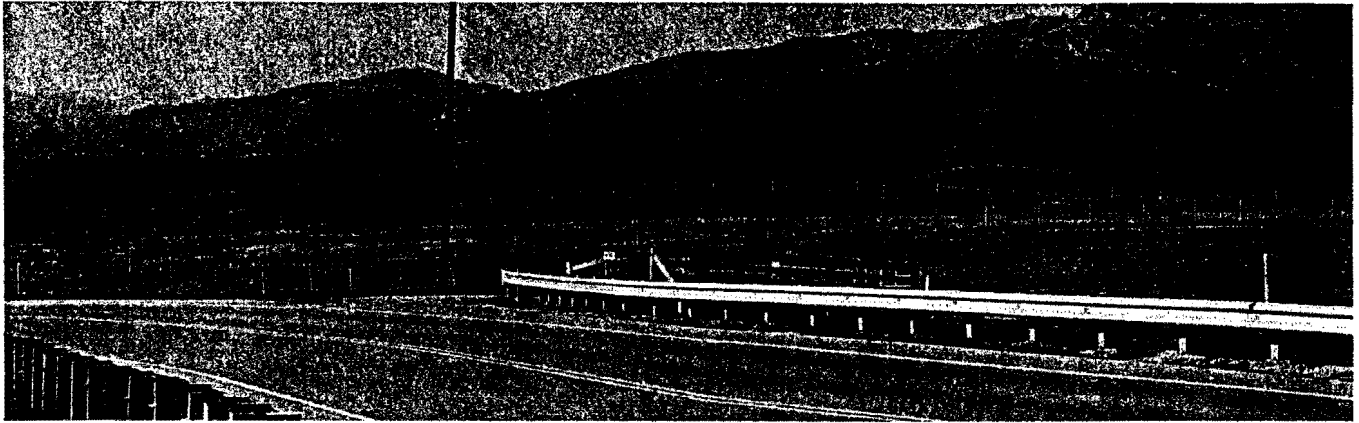


Photo A: Existing site conditions

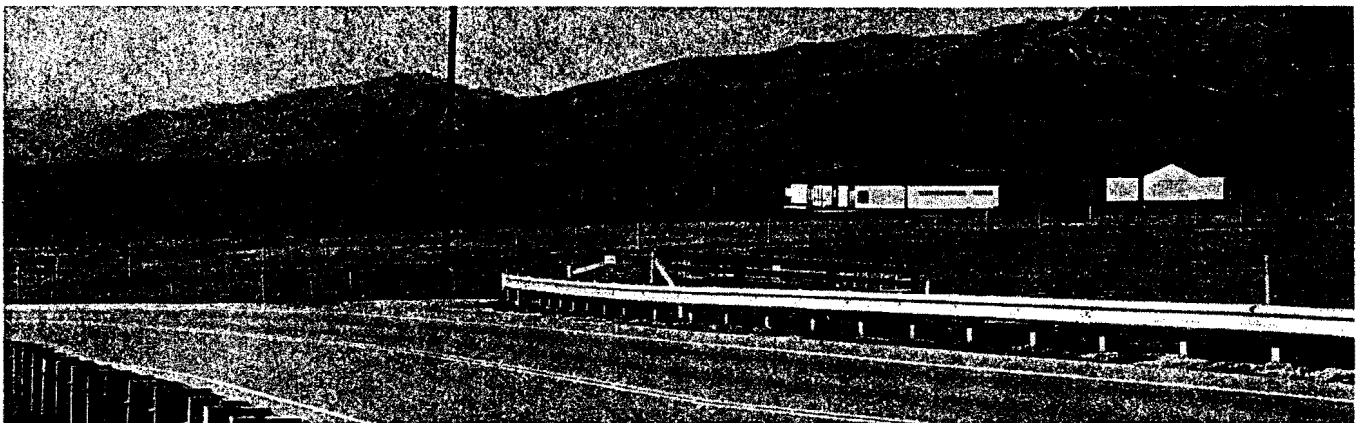


Photo B: Project without mitigation

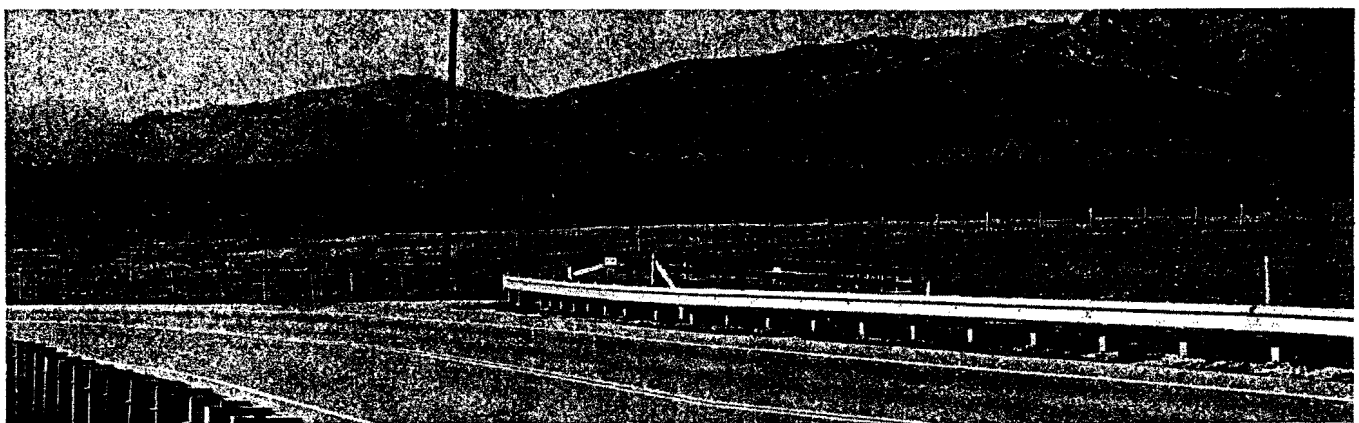


Photo C: Project with proposed mitigation