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Staff:	Randall Stemler
Staff Report:	July 25, 2002
Hearing Date:	August 7, 2002
Commission Action:	

STAFF REPORT: PERMIT AMENDMENT**APPLICATION NO.: 1-89-028-A3****APPLICANT: GENE A. MEREDITH****APPLICANT'S AGENTS:** Alan Block; Bud Kamb; Obie Bowman;
Erik Olsborg; John Phillips; Gordon McBride**PROJECT LOCATION:** 17230 Ocean Drive, Fort Bragg, Mendocino County
(APN 017-330-10)**DESCRIPTION OF PROJECT
PREVIOUSLY APPROVED:**

Division of a 56.7-acre parcel into five parcels of 8.6 acres, 10.6 acres, 11.1 are, 12.5 acres, and 13.9 acres, each with designated building envelopes; plus the construction of one paved roadway and one rocked roadway, two entrance gates, and six wells.

**DESCRIPTION OF
AMENDMENT REQUEST:**

Enlarge the building envelope for the 10.6-acre parcel at the southern end of the subdivision to 18,000 square feet and relocate the building envelope southwesterly from 75 feet to within 35 feet of the coastal bluff.

GENERAL PLAN DESIGNATION: Rural Residential – 5, Planned Unit Development
(Rural Residential – 2, Planned Unit Development)

ZONING DESIGNATION: Residential Estates (R-E)

LOCAL APPROVALS RECEIVED: Mendocino County Minor Subdivision
Approval Modification and LCP
Consistency Review

SUBSTANTIVE FILE DOCUMENTS: (1) 1-89-28, 1-89-28-A, 1-89-28-A2
(2) Mendocino County LCP

SUMMARY OF STAFF RECOMMENDATION:

The staff recommends that the Commission deny the requested amendment to the coastal development permit granted originally for the Belinda Point Subdivision, the division of a 56.7-acre parcel into five parcels of 8.6 acres, 10.6 acres, 11.1 acres, 12.5 acres, and 13.9 acres; plus the construction of one paved roadway and one rocked roadway, two entrance gates, and six wells. The Belinda Point Subdivision is located on a coastal terrace within an area designated as highly scenic. The subject property—an undeveloped parcel, except for the existence of an established water well—is the southern-most of the five parcels in the subdivision, and is located at 17230 Ocean Drive, about 3 miles south of Fort Bragg, Mendocino County.

Coastal Development Permit No. 1-89-28 (E.F.S. Associates) was approved by the Commission on June 13, 1989 with six (6) special conditions intended to: (1) ensure protection of open space and the identified environmentally sensitive habitat areas by requiring a deed restriction to be executed and recorded; (2) ensure that no interference with public rights will occur for public access to or along the shoreline, including public trust and prescriptive rights; (3) require approval for and revisions to Belinda Point Subdivision Covenants, Conditions, and Restrictions related to water conservation measures, visual screening for satellite dishes, and requirements included in the original staff report; (4) provide public access to and passive recreational use of the blufftop, beach, and rocky cove at the northerly end of Belinda Point Subdivision; (5) provide public pedestrian ingress and egress to the public access easement required in Special Condition #4; and (6) protect archaeological resources.

The original building envelopes for the subdivision, established in 1989 by approval of Coastal Development Permit No. 1-89-28, were delineated to preserve open space and protect public views. The building envelope for Parcel 1—the subject property—is situated behind a stand of

trees west of it that would serve to block views of the development by the public from Jug Handle State Reserve headlands located across a small bay southwest of the property.

The current amendment requests authorization to change the size and location of the existing building envelope established for Parcel 1. The reduction in visual screening that would result from the requested relocation and expansion of the building envelope would cause the future development of a home within the building envelope to have much greater visual impact on coastal views from public viewing areas at nearby Jug Handle State Reserve. Therefore, the proposed permit amendment would not be consistent with the certified Local Coastal Program policies regarding the protection of visual resources from new development located in highly scenic areas.

In addition, the proposed relocated building envelope would not allow for a 100-foot buffer between buildable areas and environmentally sensitive habitat located on the site as is required by the Land Use Plan buffer policies in cases where the Department of Fish & Game has not agreed to a smaller buffer. Therefore, the proposed permit amendment is also inconsistent with the LCP environmentally sensitive habitat buffer policies.

Accordingly, staff recommends that the Commission deny the permit amendment request.

STAFF NOTES:

1. Action Required at August 7 Meeting.

The permit amendment was filed as complete as of February 28, 2002. The 180th day since filing of the amendment request is August 27, 2002. The only Commission meeting occurring prior to the 180th day is the Commission meeting of August 6-9 in San Luis Obispo. Unless the applicant extends the 180-day Permit Streamlining Act deadline for action on the permit amendment request, the Commission will need to act on the project at the August 7, 2002 meeting.

2. Simultaneous Processing of CDP Appeal No. A-1-MEN-01-051

The proposed permit amendment would move the building envelope approved under the original permit for the applicants' parcel to the southwest, closer to the bluff and within a grove of trees on the terrace. The proposed permit amendment would also enlarge the building envelope from 10,000 to 18,000 square feet and reconfigure the envelope to accommodate the 210-foot length of a contemplated house, avoid the sensitive rare plant community found at the site, and reduce the setback from the bluff edge from 75 to 35 feet. The applicants have simultaneously applied to the County for a coastal development permit for the construction of the contemplated 6,810-square-foot house within the building envelope as proposed to be revised by this permit amendment. The

house is the subject of Coastal Development Permit Appeal No. A-1-MEN-01-051. At the July 11, 2002 Coastal Commission meeting, the Commission considered an appeal of the decision of the Mendocino County Planning Commission to grant a permit for the house. The Commission found that the appeal raised a substantial issue with respect to the grounds on which the appeal was filed. The hearing on the de novo portion of the appeal was continued. The proposed house that is the subject of the appeal would not fit within the building envelope established by the Commission's original subdivision permit.

The Commission notes that although gaining approval to develop the particular house proposed by the applicants under Coastal Development Permit Appeal No. A-1-MEN-01-051 is dependent on Coastal Development Permit Amendment Request No. 1-89-028-A3 also being approved, approval of the permit amendment is not dependent on Commission approving Coastal Development Permit Appeal No. A-1-MEN-01-051. The amendment request only seeks relocation and reconfiguration of the building envelope, and does not seek authorization for any particular house. Thus, in evaluating Coastal Development Permit Amendment Request No. 1-89-028-A3, the Commission must consider the effects of any future development that could be built within the envelope, not just the particular house proposed under Coastal Development Permit Appeal No. A-1-MEN-01-051.

3. Procedure and Background:

Section 13166 of the California Code of Regulations states that the Executive Director shall reject an amendment request if it lessens or avoids the intent of the approved permit unless the applicant presents newly discovered material information, which he or she could not, with reasonable diligence, have discovered and procured before the permit was granted.

Coastal Development Permit No. 1-89-028 (E.F.S Associates) was approved by the Commission on June 13, 1989 with special conditions. This original permit approved the division of a 56.7-acre parcel into five parcels of 8.6 acres, 10.6 acres, 11.1 are, 12.5 acres, and 13.9 acres; plus the construction of one paved roadway and one rocked roadway, two entrance gates, and six wells. The permit was approved with the following six Special Conditions. Special Condition No. 1 required recordation of an open space easement/deed restriction over environmentally sensitive habitat areas on the property and 50-foot buffers surrounding the ESHAs. Special Condition No. 2 states that by acceptance of the permit, the applicants agreed that approval of the permit did not prejudice any assertion of public rights of access on the property. Special Condition No. 3 required recordation of Conditions Covenants & Restrictions for the property that include requirements for the use of water-conservation measures such as water-conserving appliances and drought tolerant vegetation. Special Condition No. 4 required recordation of an offer to dedicate a vertical public access easement from the road at the east end of the property to the blufftop and beach. Special Condition No. 5 required the submittal of plans for the review and approval of the Executive Director providing for the creation of a public access opening through gates at the east end of the offered vertical public access easement. Finally, Special Condition No. 6 required the cessation of development activities if archaeological resources were found

during development until a qualified archaeologist could inspect the project site, determine the nature and significance of the archaeological materials, and, if necessary, develop appropriate mitigation measures that would be incorporated into the permit by a permit amendment request.

In its approval of the project, the Commission adopted findings indicating the project was consistent with Coastal Act visual policies in part because the proposed building envelopes would ensure that the future development of homes would not create visual impacts from public vantage points along the public road east of the site and from the vertical public access way that was required to be offered for dedication. The findings indicated the project was consistent with Coastal Act geologic hazard policies because the building envelopes would all be located 75 feet back from the bluff edge in conformance with the recommendations of a preliminary geologic report prepared for the subdivision.

The current amendment request seeks approval to change the size and location of the existing building envelope for Parcel 1. The proposed modified building envelope would be increased in size from a 100' by 100' square, totaling 10,000 square-feet, to an irregularly shaped polygon of 18,000 square-feet designed to encompass the proposed structural dimensions of the intended future residence. The location would be moved southwesterly to 35 feet from the edge of the coastal bluff.

The proposed amendment would not conflict with any of the special conditions of the permit. The proposed amendment would also not conflict with the findings adopted for consistency of the proposed building envelopes with the visual resource policies of the Coastal Act. The approval of the existing building envelope was based on findings that the building envelope would not be visible from the road and would not affect views from the vertical access way required to be offered for dedication. The findings make no mention of protecting views from Jug Handle State Reserve or any other public vantage point besides the road to the east and the location of the required access way. As discussed in the staff recommendation, staff has determined that the expanded and relocated building envelope proposed under the current amendment request would have significant visual impacts on users of Jug Handle State Reserve. However, as the findings adopted by the Commission when the original subdivision was approved do not address the protection of views from the State Reserve and only address the protection of views from the road to the east and the location of the public access way, approval of the amendment would not conflict with the intent of the Commission's action as reflected in the findings approved for the original project.

The proposed amendment would conflict with the findings adopted for consistency of the proposed building envelope with the geologic hazard policies of the Coastal Act. As noted, approval of the building envelope was based in part, on the building envelope's adherence to a 75-foot setback from the bluff edge, as recommended by the preliminary geotechnical report prepared for the subdivision. The proposed amendment request

would reduce that setback for the building envelope on Parcel 1 to 35 feet. However, newly discovered material information which the applicant could not, with reasonable diligence, have discovered and produced before the permit was granted exists. The amendment request was accompanied by an updated geotechnical report that was produced recently, many years after the Commission's action on the original permit. The geotechnical report not only reviewed current geologic conditions to update the available information about geologic hazards affecting the site, but the report also contained a site specific analysis of bluff retreat occurring at the project site. The preliminary geotechnical report prepared prior to the Commission's approval of the project in 1989 did not include a site specific analysis of bluff retreat. Instead, the preliminary geotechnical report relied on general assessments of bluff retreat for other parts of California in making its recommendation for a 75-foot setback. The more recent report determined a bluff retreat rate and recommended a geologic setback from the bluff edge of 35 feet. This recommendation supports the proposed relocation of the building envelope to a location as close as 35 feet from the bluff edge. Therefore, as the updated geotechnical report provides newly discovered material information concerning the conformance of the amendment request with the geologic hazard policies of the Coastal Act which the applicant could not, with reasonable diligence, have discovered and produced before the permit was granted, and as the proposed project would not result in a lessening or avoidance of the intent of the approved permit in other respects, the Executive Director accepted the amendment request for processing.

4. Standard of Review:

The original permit was approved by the Commission in 1989, prior to certification of the Mendocino County LCP. The standard of review for the project at that time was the policies of Chapter 3 of the Coastal Act. The Coastal Commission effectively certified Mendocino County's LCP in October of 1992. Pursuant to Section 30604 of the Coastal Act, after effective certification of an LCP, the standard of review for all coastal permits and permit amendments for developments located between the first public road and the sea is the certified LCP and the public access policies of the Coastal Act.

I. MOTION, STAFF RECOMMENDATION AND RESOLUTION:

The staff recommends that the Commission adopt the following resolution:

Motion:

I move that the Commission approve proposed amendment to Coastal Development Permit No. 1-89-028-A3 for the development as proposed by the applicant.

STAFF RECOMMENDATION OF DENIAL:

Staff recommends a **NO** vote. Failure of this motion will result in denial of the permit amendment 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 AMENDMENT:

The Commission hereby denies the proposed amendment to the coastal development permit on the grounds that the development as amended will not conform with the certified Local Coastal Program and the access policies of Chapter 3 of the Coastal Act. Approval of the amendment 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 amended development on the environment.

II. Findings and Declarations for DENIAL:

The Commission hereby finds and declares:

1. Project Setting:

The subject property is a 10.6-acre bluff top parcel located within the Belinda Point Subdivision about three miles south of Fort Bragg, Mendocino County. It is the most southerly of the 5 lots in the subdivision, which range in size from about 9 acres to about 14 acres. The project site is located west of Ocean Drive, and south of Pacific Way, at 17230 Ocean Drive (Exhibit 1 and 2).

The subject parcel is undeveloped except for an existing water well on the property. The property is zoned Rural Residential, Five Acres Minimum, Planned Development (RR:L-5:PD). Within the Rural Residential Zone, a single-family residence is a permitted use, subject to approval of a coastal development permit. The Belinda Point subdivision was originally approved by the Commission pursuant to Coastal Development Permit No. 1-89-028, which was granted to E.F.S. Associates on June 13, 1989. Each parcel has an approved building envelope proposed by the applicants as part of the subdivision. The building envelopes were initially developed to address environmental concerns related to bluff setback policies, riparian and other sensitive habitat areas, as well as archaeological resources located on the project site. In addition, conditions of the coastal development permit required that Environmentally Sensitive Habitat Areas (ESHA) on the property be deed restricted as open space. The majority of the deed restricted ESHA is located on the four parcels to the north of the applicant's property, with a small patch of protected riparian ESHA located on the applicant's parcel immediately to the east of the defined building envelope. Furthermore, an offer to dedicate a vertical public access way to a cove from Ocean Drive across the subdivision properties was required to be recorded in a location along the northerly boundary

of the subdivision, well to the north of the applicant's property. The parcels are served by two common driveways extending from Ocean Drive toward the shoreline, along alignments that are north of the applicant's parcel. All of the subdivision parcels were proposed to be served by wells and septic systems.

The subject parcel is located on a coastal terrace that slopes gently to the west and south, and is largely vegetated by maritime pine forest dominated by Bishop pine, with some occurrence of shore pine—which extends to within a few feet of the steep ocean bluff. The parcel includes approximately 550 linear feet of bluff edge. The bluff is approximately forty to fifty feet in height, with mostly near-vertical slope gradients, and has four relatively small sea caves. A transition between forestland and grassland occurs in the northwestern corner of the applicant's parcel. Along the terrace area to the north, the land assumes more of the character of open coastal-grassland, vegetated with native grasses, ferns, various wildflowers, and associated species. The existing building envelope established in 1989 by approval of Coastal Development Permit No. 1-89-28 lies generally in a clearing within the transition area, with a stand of trees approximately 100 feet wide to the west between the clearing and the bluff (Exhibit 6).

The subject parcel contains environmentally sensitive habitat areas. As noted previously, a riparian ESHA with a 50-foot buffer located immediately east of the building envelope was required to be deed restricted as open space as part of the subdivision approval. In addition, a population of the rare plant *Castilleja latifolia* spp. *mendocinensis* (Mendocino coast paintbrush) was discovered during a botanical survey performed for the proposed development by Dr. Gordon McBride in 2001 (Exhibit 3).

The property is located two parcels to the north of the mouth of Mitchell Creek, within an area designated "Highly Scenic" in the Coastal Plan. Although the parcel is not visible from Highway One or other public roads, the parcel is visible from the publicly visited Jug Handle State Reserve headland to the southwest, across the small bay that forms the ocean inlet of Mitchell Creek (Exhibit 3 and Exhibit 6). There are other residences in the view of the coastal bluff from Jug Handle State Reserve. On the parcel immediately south of the applicant's property is a partial two-story structure partly screened by trees. On the parcel immediately to the north is a one-story structure currently under construction, and north of it another single-story house, both of which are located in open grassland with no natural screening available. Although other houses can be seen from Jug Handle State Reserve, the viewscape from the park property along this stretch of coast is dominated by views of Pine Cove Beach located within the embayment at the mouth of Mitchell Creek, the dramatic coastal bluffs, and the forested bluff-top terrace (Exhibit 6). The houses are generally scattered along the terrace about every 400-500 feet.

2. Project Amendment Description

The proposed permit amendment would move the approved building envelope for the applicants' parcel to the southwest, closer to the bluff and within the approximately 100-foot wide grove of trees on the terrace mentioned above that exists near the bluff along the southwest portion of the

parcel. The proposed permit amendment would also enlarge the building envelope from 10,000 to 18,000 square feet, reconfigure the envelope to an irregular shape that would accommodate a larger and longer house, and reduce the setback from the bluff edge from 75 to 35 feet. The northwest end of the revised building envelope would extend to an area as close as 50 feet away from the population of Mendocino coast paintbrush found along the bluff edge in 2001. The northeast end of the proposed revised building envelope would extend to within 50 feet of the deed restricted open space area that encompasses the riparian ESHA to the east and a 50-foot buffer space around the riparian habitat. The proposed revised building envelope would come to within 50 feet of the riparian habitat itself.

The configuration of the proposed revised building envelope is shown in Exhibit 3. The applicant indicates that the purpose of moving and reconfiguring the building envelope is to accommodate a larger house and enable the future home to be built on the site to take advantage of the scenic whitewater and blue water views to the southwest, which include views of the headland occupied by the Jug Handle State Reserve.

The proposed relocation and reconfiguration of the building envelope is designed to accommodate a specific house design that is separately proposed by the applicants. The proposed house is the subject of Coastal Development Permit Appeal No. A-1-MEN-01-051. At the July 11, 2002 Coastal Commission meeting, the Commission considered an appeal of the decision of the Mendocino County Planning Commission to grant a permit for the house. The Commission found that the appeal raised a substantial issue with respect to the grounds on which the appeal was filed. The hearing on the de novo portion of the appeal was continued and will be considered at a subsequent Commission meeting. The proposed house that is the subject of the appeal would not fit within the building envelope established by the Commission's original subdivision permit.

The Commission notes that although gaining approval to develop the particular house proposed by the applicants under Coastal Development Permit Appeal No. A-1-MEN-01-051 is dependent on Coastal Development Permit Amendment Request No. 1-89-028-A3 also being approved, approval of the permit amendment is not dependent on Commission approving Coastal Development Permit Appeal No. A-1-MEN-01-051. The amendment request only seeks relocation and reconfiguration of the building envelope, and does not seek authorization for any particular house. Thus, in evaluating Coastal Development Permit Amendment Request No. 1-89-028-A3, the Commission must consider the effects of any future development that could be built within the envelope, not just the particular house proposed under Coastal Development Permit Appeal No. A-1-MEN-01-051.

3. Visual Resources

The subject property is located in an area designated by the Mendocino County Land Use Plan as "highly scenic." The property is also within view of Jug Handle State Reserve, a State park open to the public that includes a promontory extending into the ocean across a cove from the shoreline of the subject property (Exhibits 2 and 6). The development was

originally approved by the Commission in 1989, prior to certification of the Mendocino County LCP. The standard of review for the project at that time was the policies of Chapter 3 of the Coastal Act. The Coastal Commission effectively certified the Mendocino County LCP in 1992 and thus, the standard of review for the permit amendment is the certified LCP and the public access policies of the Coastal Act. Applicable LUP Policies and Coastal Zoning Ordinance Standards regarding the protection of visual resources from the impacts of new development are as follows:

LCP Policies

Section 30251 of the Coastal Act has been specifically incorporated into the certified LCP as LUP Policy 3.5-1 and states in applicable part:

"The scenic and visual qualities of Mendocino County 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 designated by the County of Mendocino Coastal Element shall be subordinate to the character of its setting."

Policy 3.5-3 in applicable part states:

"The visual resource areas listed below are those which have been identified on the land use maps and shall be designated as "highly scenic areas," within which new development shall be subordinate to the character of its setting. Any development permitted in these areas shall provide for the protection of ocean and coastal views from public areas including highways, roads, coastal trails, vista points, beaches, parks, coastal streams, and waters used for recreational purposes.

- *Portions of the coastal zone within the Highly Scenic Area west of Highway 1 between the Ten Mile River estuary south to the Navarro River as mapped with noted exceptions and inclusions of certain areas east of Highway 1.*

In addition to other visual policy requirements, new development west of Highway one in designated "highly scenic areas" is limited to one-story (above natural grade) unless an increase in height would not affect public views to the ocean or be out of character with surrounding structures. Variances from this standard may be allowed for planned unit development that provides clustering and other forms of meaningful visual mitigation. New development should be subordinate to natural setting and minimize reflective surfaces. All proposed divisions of land and boundary line adjustments within "highly scenic areas" will be analyzed for consistency of potential future development with visual

resource policies and shall not be allowed if development of resulting parcel(s) could not be consistent with visual policies."

LUP Policy 3.5-4 states in applicable part:

Buildings and building groups that must be sited within the highly scenic area shall be sited near the toe of a slope, below rather than on a ridge, or in or near the edge of a wooded area. Except for farm buildings, development in the middle of large open areas shall be avoided if an alternative site exists...

Minimize visual impacts of development on terraces by (1) avoiding development in large open areas if alternative site exists; (2) minimize the number of structures and cluster them near existing vegetation, natural landforms, or artificial berms; (3) provide bluff setbacks for development adjacent to or near public areas along the shoreline; (4) design development to be in scale with rural character of the area....

LUP Policy 3.5-5 states, in applicable part:

"Providing that trees will not block coastal views from public areas such as roads, parks and trails, tree planting to screen buildings shall be encouraged ..".

Coastal Zoning Ordinance Section 20.504.010 – Purpose.

"The purpose of this section is to insure that permitted development shall be sited and designated 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."

Coastal Zoning Ordinance Section 20.504.015 – Highly Scenic Areas.

(A) *The visual resource areas listed below are those which have been designated highly scenic and in which development shall be subordinate to the character of its setting:*

...

(2) *Portions of the Coastal Zone within the Highly Scenic Area west of Highway 1 between the Ten Mile River estuary south to the Navarro River as mapped with noted exceptions and inclusions of certain areas east of Highway 1.*

...

(C) *Development Criteria.*

- (1) *Any development permitted in highly scenic areas shall provide for the protection of coastal views from public areas including highways, roads, coastal trails, vista points, beaches, parks, coastal streams, and waters used for recreational purposes.*
- (2) *In highly scenic areas west of Highway 1 as identified on the Coastal Element land use plan maps, new development shall be limited to eighteen (18) feet above natural grade, unless an increase in height would not affect public views to the ocean or be out of character with surrounding structures.*
- (3) *New development shall be subordinate to the natural setting and minimize reflective surfaces. In highly scenic areas, building materials including siding and roof materials shall be selected to blend in hue and brightness with their surroundings.*
- (4) *All proposed divisions of land and boundary line adjustments within highly scenic areas shall be analyzed for consistency of potential future development with the regulations of this Chapter, and no division of land or boundary line adjustment shall be approved if development of resulting parcel(s) would be inconsistent with this Chapter.*
- (5) *Buildings and building groups that must be sited in highly scenic areas shall be sited: (a) Near the toe of a slope; (b) Below rather than on a ridge; and (c) In or near a wooded area*
- ...
- (7) *Minimize visual impacts of development on terraces by the following criteria: (a) avoiding development, other than farm buildings, in large open areas if alternative site exists; (b) minimize the number of structures and cluster them near existing vegetation, natural landforms, or artificial berms; (c) Provide bluff setbacks for development adjacent to or near public areas along the shoreline." and (d) design development to be in scale with rural character of the area.*

Discussion:

Visual Setting:

The proposed permit amendment would move the approved building envelope for the southernmost of the five lots in the Belinda Point subdivision to the southwest, closer to the bluff and within an approximately 100-foot wide grove of trees on the terrace that exists near the bluff along the southwest portion of the parcel. The proposed permit amendment would also enlarge the building envelope from 10,000 to 18,000 square feet,

reconfigure the envelope to an irregular shape that would accommodate a larger and longer house, and reduce the setback from the bluff edge from 75 to 35 feet.

The property is located two parcels to the north of the mouth of Mitchell Creek, within an area designated "Highly Scenic" in the Land Use Plan. Pursuant to LUP Policy 3.5-3, the Highly Scenic Area designation covers all those areas west of Highway One between the Ten Mile River estuary south to the Navarro River with noted mapped exceptions. LUP Map No.14 does not exclude the subject property or any of the Belinda Point area from the highly scenic designation.

Although the parcel is not visible from Highway One or other public roads, the parcel is visible from the ocean and the publicly visited Jug Handle State Reserve headland to the southwest, across the small bay or cove that forms the ocean inlet of Mitchell Creek (Exhibits 3 and 6). Trails extend to the bluff edges along the reserve headland from parking areas along Ocean Drive. The view to the northeast and north along the shoreline that extends north from the headland is dramatic and an attraction to visitors to the reserve headland. In the distance to the north, one can see the rocky Mendocino coastline extending for many miles. The more immediate view to the northeast is of Pine Cove Beach, the cove separating the headland where the Reserve is located from the main coastline where the subject property is located. The greenish-blue open waters of the cove are fringed by whitewater as ocean swells surge against rocky tidepools and wash over Pine Cove Beach at the head of the cove. Steep and rugged 40 to 50-foot-high bluffs composed of sandstone, shale, and siltstone rise above the tidepools and beach to the nearly flat continuous coastal terrace. The dark green shades of the Bishop pine forest that envelopes most of the terrace contrast dramatically with the gray and yellow earthtones of the sandstone bluffs.

There are other residences within this view northeast and north from Jug Handle State Reserve. On the parcel immediately south of the applicant's property is a partial two-story structure partly screened by trees. Farther to the south, the viewer on the blufftop at Jug Handle State Reserve can see several other one and two story structures. The house on the parcel due east of the vantage points on the bluff top of Jug Handle State Reserve dominates the view of this group of houses south of the applicant's site, both because of its closer proximity, and because of the structure's unusual central tower or cupola structure with a pyramid-shaped roof (see page 13 of Exhibit 4). This house was built prior to the Coastal Initiative and therefore was not subject to coastal development permit requirements. On the parcel immediately to the north is a one-story structure currently under construction, and north of it another single-story house, both of which are located in open grassland with no natural screening available. Although other houses can be seen from Jug Handle State Reserve, the visual character of the viewscape from the park property is dominated by the open waters of the cove, the dramatic coastal bluffs, and the forested bluff-top terrace. The houses are greatly scattered along the terrace about every 400-500 feet, generally small in stature (with the exception of the closest house which appears large because of its proximity and its tall pyramidal shaped tower) and are muted in appearance by the backdrop of pine trees that rise above the homes.

Analysis of Conformance of Amendment to Visual Resource Policies:

The visual policies of the certified Mendocino County LCP are extensive and detailed as evidenced by the listing in the previous section of this finding of the subset of those policies that are relevant to the proposed permit amendment request. It should be noted that the County's LCP policies are more detailed and restrictive than the provisions of Section 30251 of the Coastal Act, the Chapter 3 policy pertaining to the review of new development for the protection of visual resources. Section 30005 of the Coastal Act allows local governments to adopt more restrictive policies, as Mendocino County did when it adopted its LCP.

The proposed amendment is consistent with some of the visual resource policies in the Mendocino LCP. For example, LUP Policy 3.5-1 states that new development shall minimize the alteration of landforms. Moving the building envelope as proposed would not locate the future home to be built on the parcel to a location that would require extensive alteration of landforms, because the amendment would simply move the building envelope from one part of the terrace to another. As another example, LUP Policy 3.5-4 states in applicable part that buildings and building groups that must be sited within the highly scenic area shall be sited in or near the edge of a wooded area. The relocated building envelope would be relocated to be within a Bishop pine forest. However, to be approved, a proposed development in the certified area must be consistent with all of the policies and standards of the certified LCP. As discussed below, the permit amendment request is inconsistent with provisions of the certified visual resource policies and standards in at least three key respects. First, the permit amendment request is inconsistent with the provisions of LUP Policies 3.5-1, 3.5-3, and Coastal Zoning Code Sections 20.504.010 and 20.504.015(c)(3) that require new development to be visually compatible with the character of surrounding areas and to be subordinate to the natural setting. Second, the permit amendment request is inconsistent with the provisions of LUP Policies 3.5-4, and Coastal Zoning Code Section 20.504.015(C)(7)(c) that require new development to minimize the visual impacts of development on terraces by providing bluff setbacks for development adjacent to or near public areas along the shoreline. Finally, the permit amendment request is inconsistent with the provisions of LUP Policies 3.5-1 and Coastal Zoning Code Section 20.504.010 that require new development to protect views to and along the coast from public areas including parks.

New development must be visually compatible with the character of surrounding areas and be subordinate to the natural setting:

The proposed permit amendment would be inconsistent with the LCP policies and standards requiring development to be subordinate to the character of its setting for several reasons. First, the proposed expansion and relocation of the building envelope would result in the future development of a house that would require removal of a portion of the pine forest that is a key portion of the natural setting visible from Jug Handle State Reserve. By causing the future removal of this portion of the visible natural setting and its replacement with views of a residence, the proposed permit amendment would not result in new development that is subordinate to the natural setting.

As discussed above, the natural setting of the site as viewed from the Reserve is comprised largely of the open waters of the cove, the 40 to 50-foot-high bluffs of the coastal terrace, and the pine forest that forms a dark green generally 30 to 35-foot-high band of trees that appears to cover most of the terrace when viewed from Jug Handle State Reserve. The existing building envelope includes some trees, but is located mostly in an open area behind a wide arm of the forest that extends over a portion of the terrace between the building envelope and the face of the bluff that is within view of Jug Handle State Reserve as shown in Exhibit 6. Any development within the existing building envelope would be screened from view from Jug Handle State Reserve by this wide arm of the forest. In contrast, the proposed relocated and expanded building envelope would be located along the front edge of the forest area as viewed from the State Reserve. Although the relocated and expanded building envelope would be set mostly within the trees, the future development of a house within the building envelope would eliminate many of the trees, displacing this portion of the natural setting and compromising the value of the forest to screen the development.

Pages 1-5 of Exhibit 4 show the proposed relocated and expanded building envelope superimposed against a diagram showing the existing trees. The trees are shown as dots that range in size to reflect the relative sizes of the trees in each location. The exhibit shows that many existing trees are located within the proposed expanded and relocated building envelope and that only a relatively small number of trees, and generally only smaller trees, are located outside of the proposed building envelope on the side facing Jug Handle State Reserve. Approval of the envelope would establish the expectation that future coastal development permit applications would be approved for removal of trees and development of a home anywhere within the confines of the building envelope. The proposed expanded and relocated building envelope could accommodate many possible building layouts for a single-family home and additions that might be proposed in future years. Building layouts constructed utilizing all or just the southwest side of the building envelope would be prominently visible from Jug Handle State Reserve and would eliminate this edge of the forest as viewed from the Reserve. Even a building layout that would leave some room between the building and the southwest side of the building envelope, such as the layout proposed by the applicants in their concurrent application for a house, Appeal No. A-1-MEN-01-051, would displace much of this portion of the pine forest because of the need to comply with the Fire Safe Regulations (FSR) of the California Department of Forestry and Fire Protection (CDF). These Fire Safe Regulations of CDF are directed at maintaining defensible space. The defensible space regulations require removal of flammable vegetation within 30 feet of any structure, including all brush, all dead branches within 10 feet of the ground and all dead trees within 30 feet of structures. The arborist's report prepared for the proposed permit amendment and related appeal indicates that a number of trees within the building envelope are dead or dying and thus would need to be removed to meet the Fire Safe Regulations. Furthermore, establishing a building envelope that comes to within 35 feet of a bluff edge where there are magnificent ocean and coastal views would likely encourage occupants of any home built there to try to take advantage of those views by clearing and limbing trees that would otherwise block these views from the structure's windows. Because the view that would be gained by any permissible tree limbing and vegetation clearance would look out at

the headland where Jug Handle State Reserve is located, such limbing and vegetation clearance would conversely further expand views of the house from Jug handle State Reserve. Thus, the combination of direct displacement of forest trees by future development of residential structures within the proposed expanded relocated building envelope, the need to remove dead limbs and dead trees within 30 feet of the structures to comply with Fire Safe Regulations, and the potential for further removal of limbs and vegetation by future occupants of residential structures built within the proposed expanded and relocated building envelope to take advantage of dramatic coastal views from the site would result in the removal of a significant portion of the pine forest that is a major element of the natural setting as viewed from public vantage points at Jug Handle State Reserve. Thus, the proposed amendment would not result in future development that is subordinate to the natural setting because it would eliminate a key portion of the natural setting as viewed from Jug Handle State Reserve, and replace it with views of residential development.

The proposed permit amendment would also not be consistent with the LCP policies requiring development to be subordinate to the character of its setting because it would allow for development of a very large structure within the public view shed from Jug Handle State Reserve in comparison to others currently within the view shed. The amendment would enlarge the building envelope to 18,000 square feet, and thereby nearly double the size of the existing 10,000 square foot envelope. As evidenced by the 6,810-square-foot structure proposed by the applicants under Appeal No. A-1-MEN-01-051, this enlarged building envelope could accommodate a very large home. Most of the homes built to date within the Belinda Point subdivision are of more modest size. For example, the house built pursuant to Coastal Development Permit (CDP) 1-92-200 for the parcel two lots to the north of the subject property is 4,049-square feet, 20 feet in height, with an addition of 840-square feet for a sunroom and swimming pool approved by CDP 1-92-200-A1. The house immediately to the north of the subject property, as approved by Mendocino County CDP No. 99-00, is a 2,109-square-foot, 18-foot high, one-story structure, with a 576-square-foot, one-story guest cottage, and a 675-square-foot detached garage—a total development of 3,360-square feet. The fact that all of the building envelopes established within the subdivision pursuant to Coastal Development Permit No. 1-89-28 are approximately 10,000 square feet in size serves to limit the size of future homes built on the parcels. Nearly doubling the applicants building envelope to 18,000 square feet would allow for the future development of a home disproportionate in size to the other homes that are built or could be built in the future. A structure disproportionately large in comparison to other structures in the area would not be subordinate to the character of its setting.

The particular configuration of the building envelope proposed would also encourage development of a structure that could have a large expanse facing the public viewing areas at Jug Handle State Reserve in comparison with the other houses within the subdivision. The southwest side of the proposed expanded and relocated subdivision, the side facing the State Reserve, would be the longest side of the irregularly shaped envelope. From end to end this side of the envelope would measure 230 feet long. In contrast, the sides of the generally square building envelopes currently established for this parcel and the others within the subdivision are approximately 100 feet in length. Thus, the proposed expanded and enlarged building envelope

would allow for the development of a home with a façade facing Jug Handle State Reserve that is more than double the length of façade of any other house in the subdivision that faces the State Reserve. In fact, the length of façade of the house facing the State Reserve proposed by the applicants under Appeal No. A-1-MEN-01-051 that would be accommodated by the proposed new building envelope is approximately 210 feet long. The proposed expanded and enlarged building envelope would thus encourage the development of a future home on the site in a manner that places the largest expanse of the home in an orientation that faces Jug Handle State Reserve, thereby maximizing its visual impact on the State Reserve. Furthermore, this expanse could be very large in comparison with the expanse facing the State Reserve of the other homes in the subdivision. Allowing for the development of a future home built with an exceptionally large façade facing Jug Handle State Reserve would not provide for future development that is subordinate to the character of its setting as viewed from the State Reserve, the principal public vantage point with views of the site.

Therefore, the proposed relocated and expanded building envelope would not provide for future development of the site in a manner that would be visually compatible with the character of surrounding areas and subordinate to the natural setting as it would maximize the visual impact of development on the subject parcel on views from Jug Handle State Reserve by (1) eliminating part of the pine forest that forms an important part of the natural setting of the site, (2) replacing views of this portion of the pine forest with views of a home, (3) providing for the development of a very large house much larger than other homes within the visual setting, and (4) providing for the development of a house where an exceptionally large expanse of the house would face the public viewing areas at the State Reserve. Therefore, the permit amendment request is inconsistent with the provisions of LUP Policies 3.5-1, 3.5-3, and Coastal Zoning Code Sections 20.504.010 and 20.504.015(c)(3) that require new development to be visually compatible with the character of surrounding areas and subordinate to the natural setting.

New Development Must Provide Appropriate Bluff Setbacks for Development Adjacent to or Near Public Areas Along the Shoreline:

The proposed permit amendment would be inconsistent with the LCP provisions requiring that the visual impacts of new development on terraces be minimized by providing bluff setbacks for development adjacent to or near public areas along the shoreline. As described earlier, the subject property is located on a coastal terrace near Jug Handle State Reserve, a public park along the shoreline. Coastal Zoning Ordinance 20.504.015(C)(7)(c) requires that visual impacts of development on terraces should be minimized by providing bluff setbacks for development adjacent to or near public areas along the shoreline. These setbacks are distinct from setbacks required for geologic reasons, and are necessary to provide visual screening. In this instance, the original coastal development permit for the subdivision established a 75-foot setback from the bluff edge for all of the building envelopes. Although this setback was established primarily for geologic hazard concerns, the 75-foot setback did serve to help separate and screen future development within the building envelope on the subject property from the nearby Jug Handle State Reserve. As noted above, significant visual screening is attained by keeping the building

site as far back from the bluff edge as possible because of the intervening forested areas. The proposed permit amendment to relocate and expand the building envelope would reduce the existing 75-foot setback to 35 feet. As discussed above, this reduction in setback between the building envelope and the bluff edge greatly compromises the screening value of the existing forest, because relocating the envelope would require the removal of many trees and relatively few trees would remain to screen the future development from view from Jug Handle State Reserve. The bluff setback remaining would be insufficient to allow for effective screening of future development within the building envelope to reduce its visual impact. Therefore, the Commission finds that the proposed permit amendment is not consistent with the provisions of Coastal Zoning Ordinance Section 20.504.015(C)(7)(c) that require that visual impacts of development on terraces should be minimized by providing bluff setbacks for development adjacent to or near public areas along the shoreline.

Protection of Ocean and Coastal Views From Public Parks:

The permit amendment request is inconsistent with the provisions of LUP Policies 3.5-1 and Coastal Zoning Code Section 20.504.010 that require new development to protect views to and along scenic coastal areas from public areas, including parks. Jug Handle State Reserve is a state park located across the cove from the subject property. The subject property is within an area designated in the LCP as highly scenic. As discussed previously, the trails on the headland at Jug Handle State Reserve afford dramatic coastal views, including the view to the northeast and north along the shoreline where the subject property is located. This view includes blue water and whitewater views of the cove, the rugged coastal bluffs, and the pine forest that envelopes most of the terrace. The existing building envelope for the parcel established by the original permit for the subdivision would allow for future development of a house to proceed that would not affect this view, because the development would be located where it would be completely screened by an arm of the existing pine forest from view of Jug Handle State Reserve. In contrast, the proposed permit amendment would relocate and reshape future development of the subject parcel in a manner that would eliminate a portion of the pine forest within view of the State Reserve and replace it with largely unscreened views of an exceptionally large expanse of house. In this rural coastal setting where homes are scattered relatively far apart and the visual character is established mostly by the natural features of the site including the cove, the rugged bluff face, and the pine forest that envelopes the terrace, development of one large home in a prominent location would have significant adverse impacts on the coastal views afforded from the Jug Handle State Reserve headland. Thus, relocating and enlarging the building envelope on the subject property as proposed would harm rather than protect views to and along this scenic coastal area. Therefore, the proposed permit amendment is inconsistent with the provisions of LUP Policies 3.5-1 and Coastal Zoning Code Section 20.504.010 that require new development to protect views to and along scenic coastal areas from public areas, including parks.

4. Environmentally Sensitive Habitat Areas:

In 1989, when the permit was granted, the subject property was known to contain one riparian ESHA to the east of the existing and proposed building envelopes. This ESHA was protected in the original permit through the imposition of an open space deed restriction over the ESHA itself and a 50-foot buffer surrounding the ESHA. Since that time, one additional ESHA has been discovered on the property, consisting of a population of Mendocino paintbrush, a rare plant population. The Mendocino paint brush is located along the edge of the bluff to the southwest of the existing building envelope. This discovery was made in 2001 by the applicant's biologist.

LCP Policies:

3.1-7 *"A buffer area shall be established adjacent to all environmentally sensitive habitat areas. The purpose of this buffer area shall be to provide for a sufficient area to protect the environmentally sensitive habitat from significant degradation resulting from future developments. The width of the buffer area shall be a minimum of 100 feet, unless an applicant can demonstrate, after consultation and agreement with the California Department of Fish and Game, and County Planning Staff, that 100 feet is not necessary to protect the resources of that particular habitat area from possible significant disruption caused by the proposed development. The buffer area shall be measured from the outside edge of the environmentally sensitive habitat areas and shall not be less than 50 feet in width. New land division shall not be allowed which will create new parcels entirely within a buffer area. Developments permitted within a buffer area shall generally be the same as those uses permitted in the adjacent environmentally sensitive habitat area and must comply at a minimum with each of the following standards:*

1. *It shall be sited and designed to prevent impacts which would significantly degrade such areas;*
- (c) *It shall be compatible with the continuance of such habitat areas by maintaining their functional capacity and their ability to be self-sustaining and to maintain natural species diversity; and*
3. *Structures will be allowed within the buffer area only if there is no other feasible site available on the parcel. Mitigation measures, such as planting riparian vegetation, shall be required to replace the protective values of the buffer area on the parcel, at a minimum ratio of 1:1, which are lost as a result of development under this solution."*

3.1-10 *"Areas where riparian vegetation exists, such as riparian corridors, are environmentally sensitive habitat areas and development within such areas shall be limited to only those uses which are dependent on the riparian resources. All such areas shall be protected against any significant disruption*

of habitat values by requiring mitigation for those uses which are permitted. No structure or development, including dredging, filling, vegetation removal and grading, which could degrade the riparian area or diminish its value as a natural resource shall be permitted in the Riparian Corridor except for:

- *Channelizations, dams, or other substantial alterations of rivers and streams as permitted in Policy 3.1-9;*
- *pipelines, utility lines and road crossings, when no less environmentally damaging alternative route is feasible;*
- *existing agricultural operations;*
- (d) *removal of trees for disease control, public safety purposes, or for firewood for the personal use of the property owner at his or her residence. Such activities shall be subject to restrictions to protect the habitat values."*

Section 20.496.010 of the Coastal Zoning Ordinance states in applicable part:

"Purpose.

The purpose of this Chapter is to ensure that environmentally sensitive habitat and other designated resource areas listed on Pages 39, 40 and 41 of the Coastal Element dated November 5, 1985, which constitute significant public resources are protected for both the wildlife inhabiting them as well as the enjoyment of present and future populations.

Environmentally Sensitive Habitat Areas (ESHA's) include: anadromous fish streams, sand dunes, rookeries and marine mammal haul-out areas, wetlands, riparian areas, areas of pygmy vegetation which contain species of rare or endangered plants and habitats of rare and endangered plants and animals."

Section 20.496.015 of the Coastal Zoning Ordinance states in applicable part:

"ESHA- Development Application Procedures

- (A) *Determining Extent of ESHA. The Coastal Permit Administrator shall review, with the assistance of land use maps, all permit applications for coastal developments to determine whether the project has the potential to impact an ESHA. A project has the potential to impact an ESHA if*
 - (1) *The development is proposed to be located on a parcel or proximate to a parcel identified on the land use plan map with a rare and/or endangered species symbol;*
 - (2) *The development is proposed to be located within an ESHA, according to an on-site investigation, or documented resource information;*

- (3) *The development is proposed to be located within one hundred (100) feet of an environmentally sensitive habitat and/or has potential to negatively impact the long-term maintenance of the habitat, as determined through the project review.*

Development proposals in ESHA's including but not limited to those shown on the coastal land use maps, or which have the potential to impact an ESHA, shall be subject to a biological survey, prepared by a qualified biologist, to determine the extent of the sensitive resource, to document potential negative impacts, and to recommend appropriate mitigation measures. The biological survey shall be submitted for the review and approval of the Coastal Permit Administrator prior to a determination that the project application is complete. The biological survey shall be prepared as described in Section 20.532.060, 'Environmental Sensitive Habitat Area - Supplemental Application Procedures.'

Section 20.496.020 of the Coastal Zoning Ordinance states in applicable part:

"ESHA- Development Criteria

- (A) *Buffer areas. A buffer shall be established adjacent to all environmentally sensitive habitat areas. The purpose of this buffer area shall be to provide for a sufficient area to protect the environmentally sensitive habitat from degradation resulting from future developments and shall be compatible with the continuance of such habitat areas.*

(1) Width.

The width of the buffer area shall be a minimum of one hundred (100) feet, unless an applicant can demonstrate, after consultation with the California Department of Fish and Game, and County Planning staff, that one hundred feet is not necessary to protect the resources of that particular habitat area from possible significant disruption caused by the proposed development. The buffer area shall be measured from the outside edge of the Environmentally Sensitive Habitat Areas and shall not be less than fifty (50) feet in width [emphasis added]....Standards for determining the appropriate width of the buffer area are as follows:

(a) Biological Significance of Adjacent Lands.

Lands adjacent to a wetland, stream, or riparian habitat area vary in the degree to which they are functionally related to these habitat areas. Functional relationships may exist if species associated with such areas spend a significant portion of their life cycle on adjacent lands. The

degree of significance depends upon the habitat requirements of the species in the habitat area (e.g., nesting, feeding, breeding, or resting).

Where a significant functional relationship exists, the land supporting this relationship shall also be considered to be part of the ESHA, and the buffer zone shall be measured from the edge of these lands and be sufficiently wide to protect these functional relationships. Where no significant functional relationships exist, the buffer shall be measured from the edge of the wetland, stream, or riparian habitat that is adjacent to the proposed development.

- (b) Sensitivity of Species to Disturbance. The width of the buffer zone shall be based, in part, on the distance necessary to ensure that the most sensitive species of plants and animals will not be disturbed significantly by the permitted development. Such a determination shall be based on the following after consultation with the Department of Fish and Game or others with similar expertise:*
 - (i) Nesting, feeding, breeding, resting, or other habitat requirements of both resident and migratory fish and wildlife species;*
 - (ii) An assessment of the short-term and long-term adaptability of various species to human disturbance;*
 - (iii) An assessment of the impact and activity levels of the proposed development on the resource.*
- (c) Susceptibility of Parcel to Erosion. The width of the buffer zone shall be based, in part, on an assessment of the slope, soils, impervious surface coverage, runoff characteristics, and vegetative cover of the parcel and to what degree the development will change the potential for erosion. A sufficient buffer to allow for the interception of any additional material eroded as a result of the proposed development should be provided.*
- (d) Use of Natural Topographic Features to Locate Development. Hills and bluffs adjacent to ESHA's shall be used, where feasible, to buffer habitat areas. Where otherwise permitted, development should be located on the sides of hills away from ESHA's. Similarly, bluff faces should not be developed, but shall be included in the buffer zone.*
- (e) Use of Existing Cultural Features to Locate Buffer Zones. Cultural features (e.g., roads and dikes) shall be used, where*

feasible, to buffer habitat areas. Where feasible, development shall be located on the side of roads, dikes, irrigation canals, flood control channels, etc., away from the ESHA.

- (f) Lot Configuration and Location of Existing Development. Where an existing subdivision or other development is largely built-out and the buildings are a uniform distance from a habitat area, at least that same distance shall be required as a buffer zone for any new development permitted. However, if that distance is less than one hundred (100) feet, additional mitigation measures (e.g., planting of native vegetation) shall be provided to ensure additional protection. Where development is proposed in an area that is largely undeveloped, the widest and most protective buffer zone feasible shall be required.*
- (g) Type and Scale of Development Proposed. The type and scale of the proposed development will, to a large degree, determine the size of the buffer zone necessary to protect the ESHA. Such evaluations shall be made on a case-by-case basis depending upon the resources involved, the degree to which adjacent lands are already developed, and the type of development already existing in the area.*
- (2) Configuration. The buffer area shall be measured from the nearest outside edge of the ESHA (e.g., for a wetland from the landward edge of the wetland; for a stream from the landward edge of riparian vegetation or the top of the bluff).*
- (3) Land Division...*
- (4) Permitted Development. Development permitted within the buffer area shall comply at a minimum with the following standards:*

 - (a) Development shall be compatible with the continuance of the adjacent habitat area by maintaining the functional capacity, their ability to be self-sustaining and maintain natural species diversity.*
 - (b) Structures will be allowed within the buffer area only if there is no other feasible site available on the parcel.*
 - (c) Development shall be sited and designed to prevent impacts which would degrade adjacent habitat areas. The determination of the best site shall include consideration of drainage, access, soil type, vegetation, hydrological characteristics, elevation, topography, and distance from*

natural stream channels. The term "best site" shall be defined as the site having the least impact on the maintenance of the biological and physical integrity of the buffer strip or critical habitat protection area and on the maintenance of the hydrologic capacity of these areas to pass a one hundred (100) year flood without increased damage to the coastal zone natural environment or human systems.

- (d) Development shall be compatible with the continuance of such habitat areas by maintaining their functional capacity and their ability to be self-sustaining and to maintain natural species diversity.*
- (e) Structures will be allowed within the buffer area only if there is no other feasible site available on the parcel. Mitigation measures, such as planting riparian vegetation, shall be required to replace the protective values of the buffer area on the parcel, at a minimum ratio of 1:1, which are lost as a result of development under this solution.*
- (f) Development shall minimize the following: impervious surfaces, removal of vegetation, amount of bare soil, noise, dust, artificial light, nutrient runoff, air pollution, and human intrusion into the wetland and minimize alteration of natural landforms.*
- (g) Where riparian vegetation is lost due to development, such vegetation shall be replaced at a minimum ratio of one to one (1:1) to restore the protective values of the buffer area.*
- (h) Aboveground structures shall allow peak surface water flows from a one hundred (100) year flood to pass with no significant impediment.*
- (i) Hydraulic capacity, subsurface flow patterns, biological diversity, and/or biological or hydrological processes, either terrestrial or aquatic, shall be protected.*
- (j) Priority for drainage conveyance from a development site shall be through the natural stream environment zones, if any exist, in the development area. In the drainage system design report or development plan, the capacity of natural stream environment zones to convey runoff from the completed development shall be evaluated and integrated with the drainage system wherever possible. No structure shall interrupt the flow of groundwater within a buffer strip. Foundations shall be situated with the long axis of interrupted impermeable vertical surfaces oriented parallel to the groundwater flow direction. Piers may be allowed on a case by case basis.*

- (k) *If findings are made that the effects of developing an ESHA buffer area may result in significant adverse impacts to the ESHA, mitigation measures will be required as a condition of project approval. Noise barriers, buffer areas in permanent open space, land dedication for erosion control, and wetland restoration, including off-site drainage improvements, may be required as mitigation measures for developments, may be required as mitigation measures for developments adjacent to environmentally sensitive habitats."*

Section 20.496.035 of the Coastal Zoning Ordinance states in applicable part:

"Riparian Corridors and other Riparian Resource Areas.

- (A) *No development or activity which could degrade the riparian area or diminish its value as a natural resource shall be permitted in the riparian corridor or in any area of riparian vegetation except for the following:*
- (1) Channelizations, dams or other alterations of rivers and streams as permitted in Section 20.496.030(C);*
 - (2) Pipelines, utility lines and road and trail crossings when no less environmentally damaging alternative route is feasible;*
 - (3) Existing agricultural operations;*
 - (4) Removal of trees for disease control, public safety purposes or personal use for firewood by property owner.*
- (A) *Requirements for development in riparian habitat areas are as follows:*
- (1) The development shall not significantly disrupt the habitat the habitat area and shall minimize potential development impacts or changes to natural stream flow such as increased runoff, sedimentation, biochemical degradation, increased stream temperatures and loss of shade created by development;*
 - (2) No other feasible, less environmentally sensitive alternative exists;*
 - (3) Mitigation measures have been incorporated into the project to minimize adverse impacts upon the habitat;*
 - (4) Where development activities caused the disruption or removal of riparian vegetation, replanting with appropriate native plants shall be required at a minimum ratio of one to one (1:1) and replaced if the survival rate is less than seventy-five (75) percent."*

Discussion:

In 1989, when the permit was granted, the subject property was known to contain one riparian ESHA to the east of the existing and proposed building envelopes. This ESHA was protected in the original permit through the imposition of an open space deed restriction over the ESHA itself

and a 50-foot buffer surrounding the ESHA. Since that time, one additional ESHA has been discovered on the property, consisting of a population of Mendocino paintbrush, a rare plant population. The Mendocino paint brush is located along the edge of the bluff to the southwest of the existing building envelope. This discovery was made in 2001 by the applicant's biologist.

LUP Policy 3.1-7 and Zoning Code Section 20.496.020 require that buffer areas shall be established adjacent to all environmentally sensitive habitat areas to provide sufficient area to protect the environmentally sensitive habitat from significant degradation resulting from future developments. These provisions of the LCP state that the width of the buffer area shall be a minimum of one hundred (100) feet, unless an applicant can demonstrate, after consultation with the California Department of Fish and Game, and County Planning staff, that one hundred feet is not necessary to protect the resources of that particular habitat area from possible significant disruption caused by the proposed development, in which case the buffer can be reduced to not less than fifty (50) feet in width.

Coastal Zoning Code Section 20.496.020(A)(1)(a) through (g) sets forth specific standards to be considered when determining the width of a buffer. These standards include: (a) an assessment of the biological significance of adjacent lands and the degree to which they are functionally related to wetland resources, (b) the sensitivity of species to disturbance such that the most sensitive species of plants and animals will not be disturbed significantly by the permitted development, (c) the susceptibility of the parcel to erosion determined from an assessment of the slope, soils, impervious surface coverage, runoff characteristics, and vegetative cover of the parcel, (d) the use of natural topographic features to locate development so that hills and bluffs adjacent to ESHA's can be used to buffer habitat areas, (e) use of existing cultural features such as roads and dikes to buffer habitat areas, (f) lot configuration and location of existing development such that buildings are a uniform distance from the habitat area, and provision for additional mitigation if the distance is less than 100 feet, and (g) the type and scale of development proposed as a determining factor for the size of the buffer zone necessary to protect the ESHA.

The northwest corner of the proposed relocated building envelope would share the same line as that defining a 50-foot setback boundary for an endangered species ESHA. This ESHA resource is a population of Mendocino coast paintbrush (*Castilleja latifolia mendocinensis*) that was discovered on the property in June 2001. Similarly, the northeast corner of the proposed building envelope coincides with the 50-foot setback established in 1989 as a buffer for a riparian ESHA. The applicant intends to build a single-family residence in the building envelope proposed for relocation. This probable future development must be taken into account during the review of this permit amendment. It is apparent that the proposed building envelope would not provide for ESHA buffers of 100 feet for the riparian and rare plant habitat. If buffers of 100 feet were established for the two ESHAs, approximately 4,000 square feet of the northwest side of the proposed building envelope would need to be reduced to accommodate the rare plant habitat; and approximately 1,800 square feet of the eastern-most portion of the proposed building enveloped

would need to be reduced to accommodate the riparian habitat. A reduction of approximately 5,800 square feet from 18,000 square feet, would leave approximately 12,200 square feet.

No evidence has ever been presented with the application that substantiates that only 50-foot buffers are adequate, or that addresses the factors set forth in Coastal Zoning Ordinance Section 20.496.020(A)(1)(a) through (g) for determining the width of a buffer. Furthermore, there is no evidence that the California Department of Fish and Game was consulted with and agreed to a reduction of the buffer below the minimum standard of 100 feet. It is unclear if Fish & Game was ever contacted about the project. As noted previously, LUP Policy 3.1-7 and Zoning Code Section 20.496.020 states that the width of a buffer shall be a minimum of 100 feet unless an applicant can demonstrate, after consultation with the Department of Fish and Game and County Planning Staff that one hundred feet is not necessary to protect the habitat resources.

Therefore, the Commission finds that the proposed permit amendment is inconsistent with the provisions of LUP Policies 3.1-7 and Coastal Zoning Ordinance Section 20.496.020 concerning establishment of buffers between future development on a parcel and existing ESHA because the proposed amendment would not establish a buffer width based on the standards set forth in Coastal Zoning Ordinance Section 20.496.020 (A) (1) (a) through (g). Furthermore, the Commission finds that the proposed permit amendment is inconsistent with the provisions of LUP Policy 3.1-7 and Coastal Zoning Ordinance Section 20.496.020 (A) (1) for reducing the minimum buffer below 100 feet, because no evidence has been provided that all the necessary criteria for reducing the buffer to a width less than 100 feet have been satisfied.

As discussed further below in the section on alternatives, denial of this amendment request to relocate the building envelope southwest closer to the coastal bluff would still leave the applicant feasible alternatives to use the property. The parcel contains 10.6 acres within which adequate building sites exist that would not impinge upon ESHA resources. It may also be possible to substantiate the permissibility of ESHA buffers at less than 100 feet that would provide adequate habitat protection consistent with the above-referenced limitations contained in LUP Policy 3.1-7 and Coastal Zoning Code Section 20.496.020.

The commission therefore denies a coastal development permit amendment for relocation and enlargement of the building envelope on the grounds that the modification would not be in conformity with the visual resource policies or ESHA protection policies and standards of the certified LCP as cited above.

5. Geologic Hazards and New Development:

LCP Policies:

LUP Policy 3.4-7 states:

"The County shall require that new structures be set back a sufficient distance from the edges of bluffs to ensure their safety from bluff erosion and cliff retreat during their economic life spans (75 years). Setbacks shall be of sufficient distance to eliminate the need for shoreline protective works. Adequate setback distances will be determined from information derived from the required geologic investigation and from the following setback formula:

$$\text{Setback (meters)} = \text{Structure life (years)} \times \text{Retreat rate (meters/year)}$$

The retreat rate shall be determined from historical observation (e.g., aerial photographs) and/or from a complete geotechnical investigation.

All grading specifications and techniques will follow the recommendations cited in the Uniform Building Code or the engineering geologist's report."

This language is reiterated in Zoning Code Section 20.500.020(B).

LUP 3.4-9 states that:

"Any development landward of the blufftop setback shall be constructed so as to ensure that surface and subsurface drainage does not contribute to the erosion of the bluff face or to the instability of the bluff itself"

Zoning Code Section 20.500.010 states that development shall:

- (1) "Minimize risk to life and property in areas of high geologic, flood and fire hazard;*
- (2) Assure structural integrity and stability; and*
- (3) Neither create nor contribute significantly to erosion, geologic instability or destruction of the site or surrounding areas, nor in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs"*

Zoning Code Section 20.500.020(B) state:

"Construction landward of the setback shall not contribute to erosion of the bluff face or to instability of the bluff."

LCP Policy 3.4-12 and Zoning Code Section 20.500.020(E)(1) state:

"Seawalls, breakwaters, revetments, groins, harbor channels and other structures altering natural shoreline processes or retaining walls shall not be permitted unless judged necessary for the protection of existing development, public beaches or coastal dependent uses."

Discussion:

The building envelopes established on each lot of the subdivision pursuant to the original permit were located at least 75 feet back from the edge of the bluff to ensure that bluff retreat would not affect the development over the life of the structure. The preliminary geotechnical report prepared prior to the Commission's approval of the project in 1989 did not include a site specific analysis of bluff retreat. Instead, the preliminary geotechnical report relied on general assessments of bluff retreat for other parts of California in making its recommendation for a 75-foot setback. A new geologic investigation by BACE Geotechnical has been performed since that time with a site specific evaluation of the expected bluff retreat rate at the site. A report was issued, dated June 28, 2001, that determined that the setback from the coastal bluff could be reduced to 33 feet. The Coastal Commission staff geologist reviewed the report, visited the site, and met with the applicants' geologist. After reviewing requested additional documentation concerning the analysis of aerial photos, the Commission staff geologist determined that the applicants' geologist's projection of the bluff retreat rate and his recommendations were reasonable.

The southwestern boundary of the proposed modified building envelope provides for a bluff setback of 35 feet from the coastal bluff edge, consistent with the recommendations of the geotechnical report.

The Commission thus finds that if the recommendations of the geotechnical report were implemented, the proposed development amendment, as conditioned, would be consistent with the policies of the Mendocino County LCP regarding geologic hazards, including LUP Policies 3.4-7, 3.4-9, 3.4-12, and Zoning Code Sections 20.500.010 and 20.500.020, because the proposed development would not result in the creation of any geologic hazards, and would not create nor contribute significantly to erosion or geologic instability of the coastal bluff.

6. Alternatives

Denial of the proposed permit amendment will not eliminate all economically beneficial or productive use of the applicant's property or unreasonably limit the owner's reasonable investment backed expectations of the subject property. Denial of this amendment request to relocate the building envelope southwest closer to the coastal bluff, would still leave the applicant available alternatives to develop the property in a manner that would be consistent with the visual resource protection, ESHA buffer, and all other policies of the LCP.

Portions of the existing building envelope are located between 50 and 100 feet away from the riparian ESHA to the east that was required to be protected by an open space deed restriction as

part of the original permit. The Commission notes that the standard of review that governed the Commission's review of the subdivision was the Chapter 3 policies of the Coastal Act, because the Mendocino County LCP had not yet been certified. Section 30005 of the Coastal Act allows local governments to adopt LCP policies that are more restrictive than the policies of the Coastal Act. The Mendocino LCP ESHA buffer policies are more restrictive in that they establish minimum buffer widths, unlike the Coastal Act. Since certification of these policies, the development of any home within the building envelope established for the lot would also have to be reviewed for conformance with the ESHA buffer policies as new development, even though the development may be contained totally within the building envelope. Because the building envelope is located at least 50 feet away from the ESHA, development could still be found to be in conformance with the LCP ESHA policies if an analysis of buffer width and consultation with the Department of Fish and Game determined that a buffer of more than 50 feet but less than 100 feet is sufficient in that location. As discussed in the visual finding, development within the building envelope approved by the Commission in its original approval of 1-89-028 would be screened by the existing pine forest from view from Jug Handle State Reserve and would be subordinate to the character of its setting and protective of views to and along scenic coastal areas. Therefore, development would be consistent with the visual resource policies of the LCP. Because the building envelope is located 75 feet away from the bluff edge, development within the building envelope would also be set back sufficiently from the bluff edge to conform to the 35-foot setback recommendations of the geotechnical report prepared for the project and could be found consistent with the geologic hazard provisions of the LCP.

In addition, whether or not development within the existing building envelope would be consistent with the subsequently certified LCP ESHA buffer standards, there are many other locations on this relatively large 10.6-acre parcel where development could proceed in conformance with LCP policies once a permit amendment to move the building envelope is obtained from the Commission. Development on the eastern half of the property and along the north side could be located so as to maintain at least a 100-foot buffer from the two ESHA identified on the property. In addition, development in many locations within the eastern half of the property would remain screened from view from the road and the offered public access way, and would be completely hidden from Jug Handle State Reserve by dense forest growth. Furthermore, locations to the east would be even farther away from the bluff edge and beyond geologic setback requirements.

Therefore, the Commission finds that feasible alternatives to the proposed project exist for developing the parcel in the future with a single-family residence consistent with the certified LCP.

7. California Environmental Quality Act (CEQA)

Section 13096 of the Commission's administrative regulations requires Commission approval of Coastal Development Permit applications to be supported by a finding showing the application, as modified 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 which the activity may have on the environment.

The Commission incorporates its findings on inconsistency with LCP policies at this point as if set forth in full. As previously stated, the proposed expansion and relocation of the approved building envelope is not consistent with the visual resource protection policies and environmentally sensitive habitat policies of the Mendocino County LCP. The Commission has found that approval of the changes to the building envelope would have significant adverse visual and habitat impacts. As such, the proposed permit amendment cannot be found consistent with the certified LCP policies and is recommended for denial.

As discussed above, there are feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse effect that the development may have on the environment. Therefore, the Commission finds that the proposed project cannot be found consistent with the requirements of the Coastal Act to conform to CEQA.

Exhibits:

1. Regional Location Map
2. Vicinity Map
3. Site Plan
4. Project Plans
5. State Park's Letter
6. Aerial Photo

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

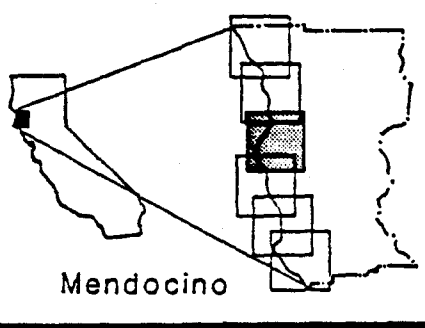
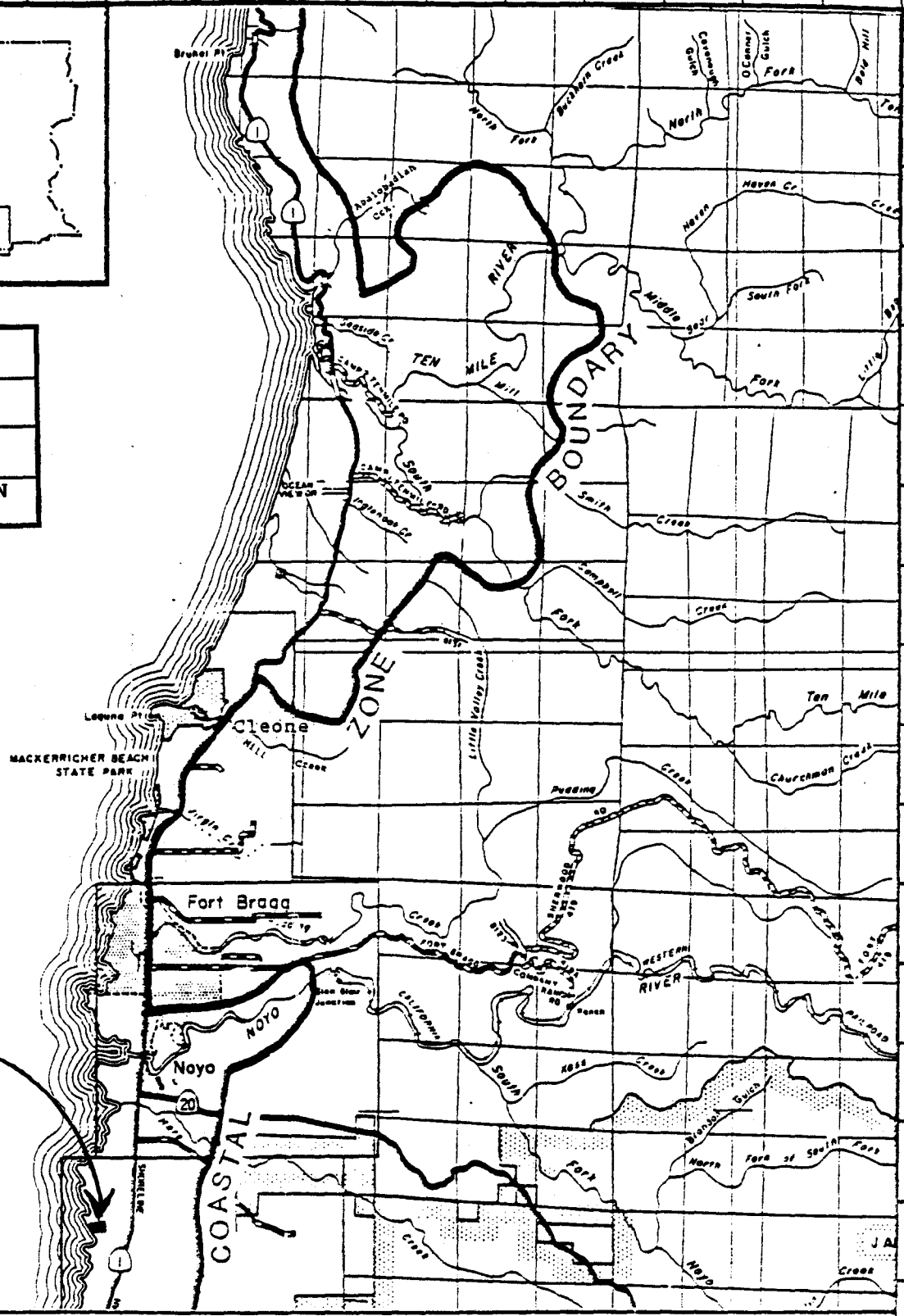


EXHIBIT NO. 1
 APPLICATION NO.
 1-89-028-A3
 MEREDITH
 REGIONAL LOCATION
 MAP



Project Site

Belinda Point Subdivision and Neighboring Property

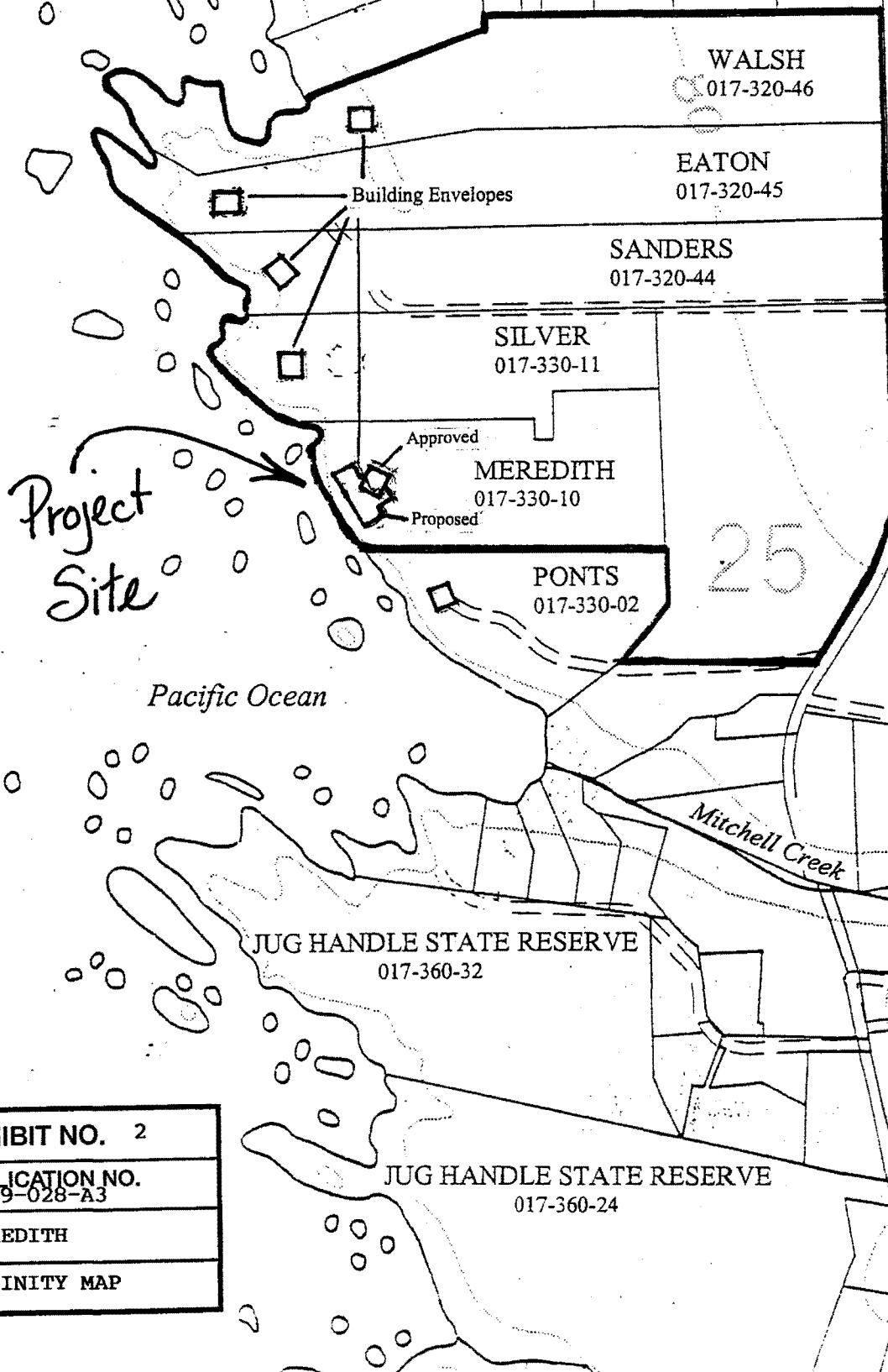


EXHIBIT NO. 2

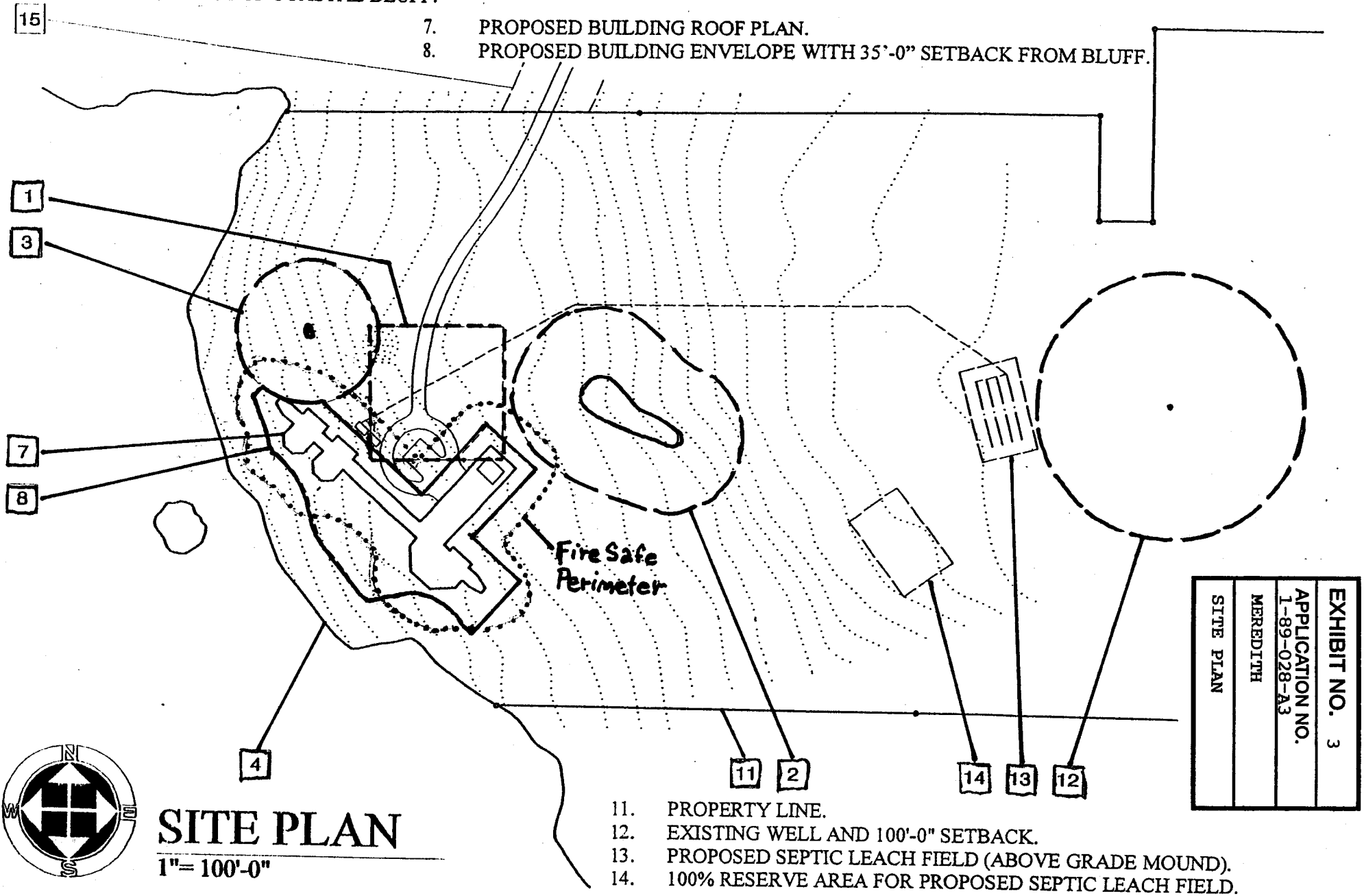
APPLICATION NO.
1-89-028-A3

MEREDITH

VICINITY MAP

1. ORIGINAL BUILDING ENVELOPE.
2. APPROXIMATE RIPARIAN AREA AND 50'-0" SETBACK.
3. MENDOCINO COAST PAINTBRUSH AND 50'-0" SETBACK.
4. TOP EDGE OF COASTAL BLUFF.

7. PROPOSED BUILDING ROOF PLAN.
8. PROPOSED BUILDING ENVELOPE WITH 35'-0" SETBACK FROM BLUFF.

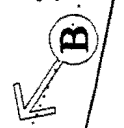
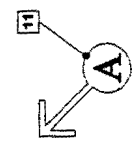


MEREDITH RESIDENCE
 17230 OCEAN DRIVE, FORT BRAGG, CA 95437

EXHIBIT NO. 4
APPLICATION NO. 1-89-028-A3
MEREDITH
PROJECT PLANS (1 of 14)

SITE PLAN
 1" = 40'-0"

SEE
 CLOSE-UP
 SHEETS 1-4.



2

2
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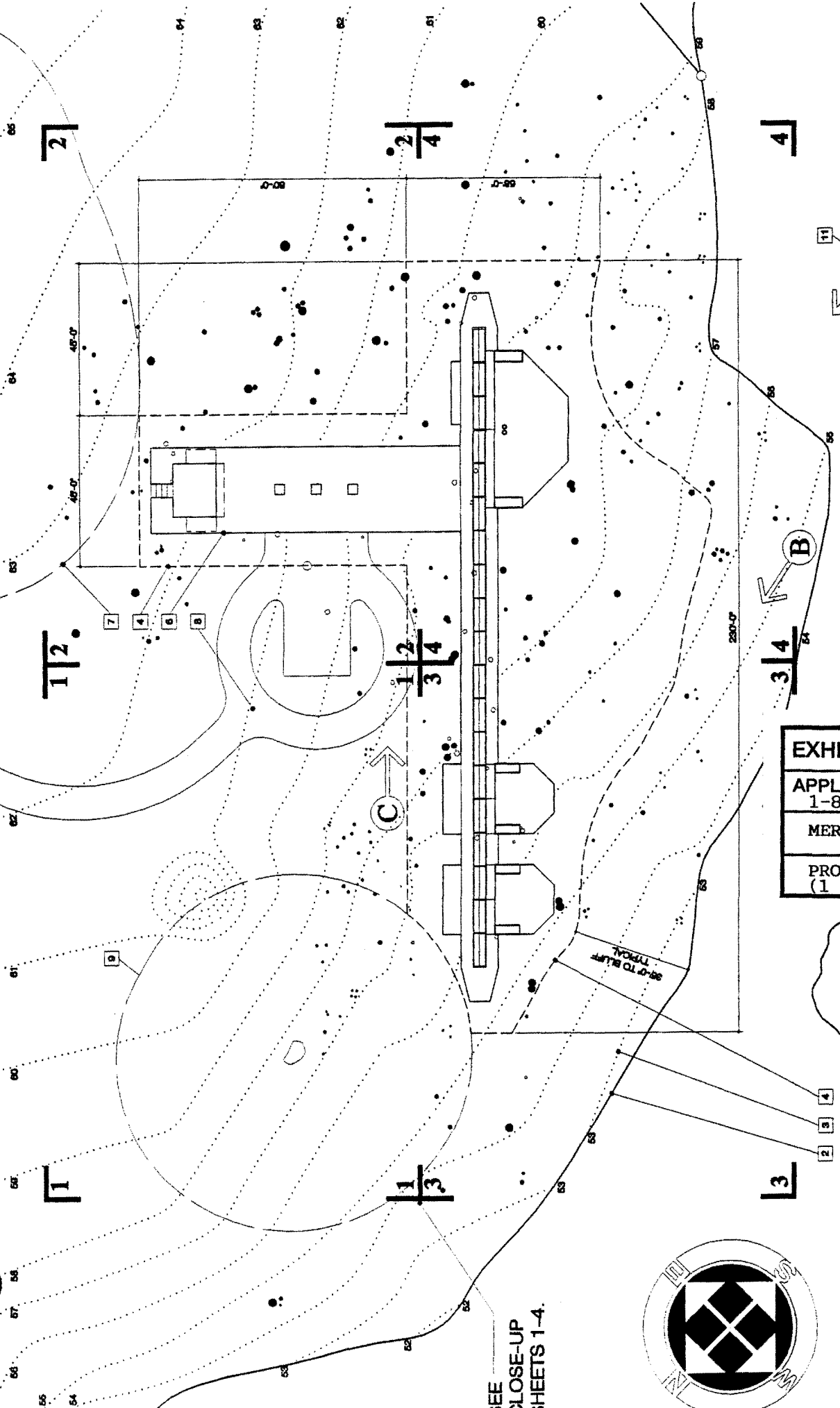
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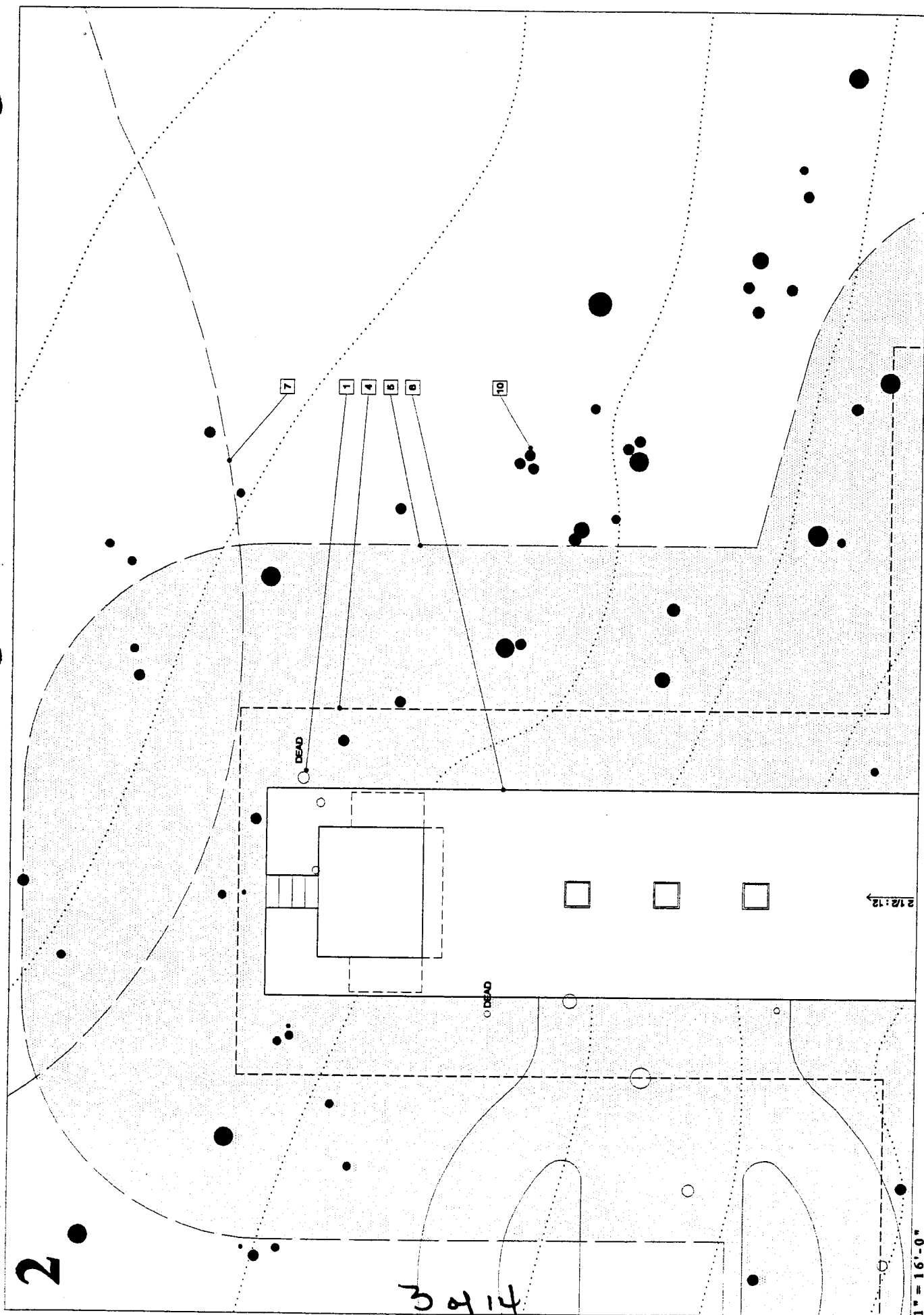
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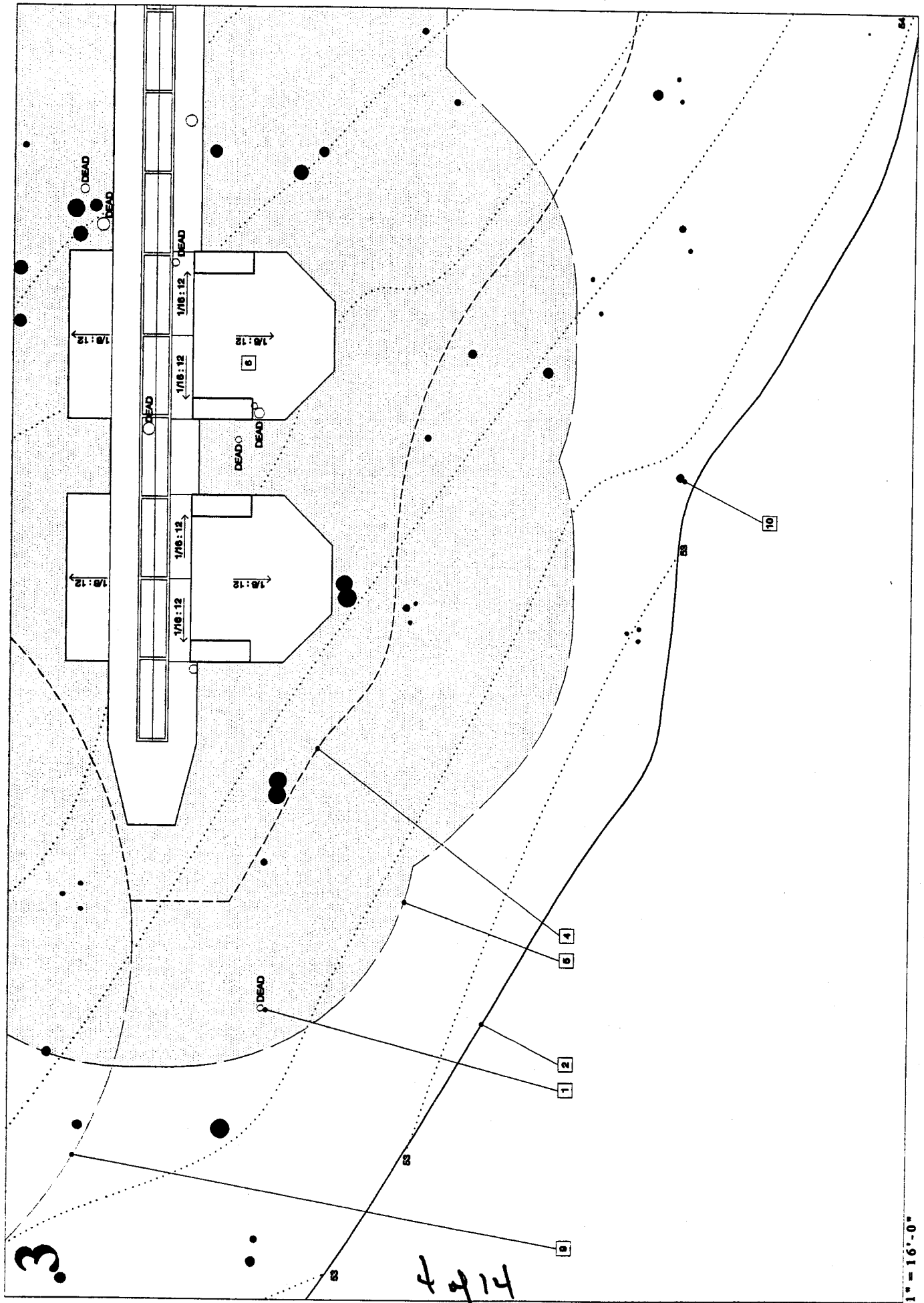
34'-0" TO BLUFF
 TYPICAL

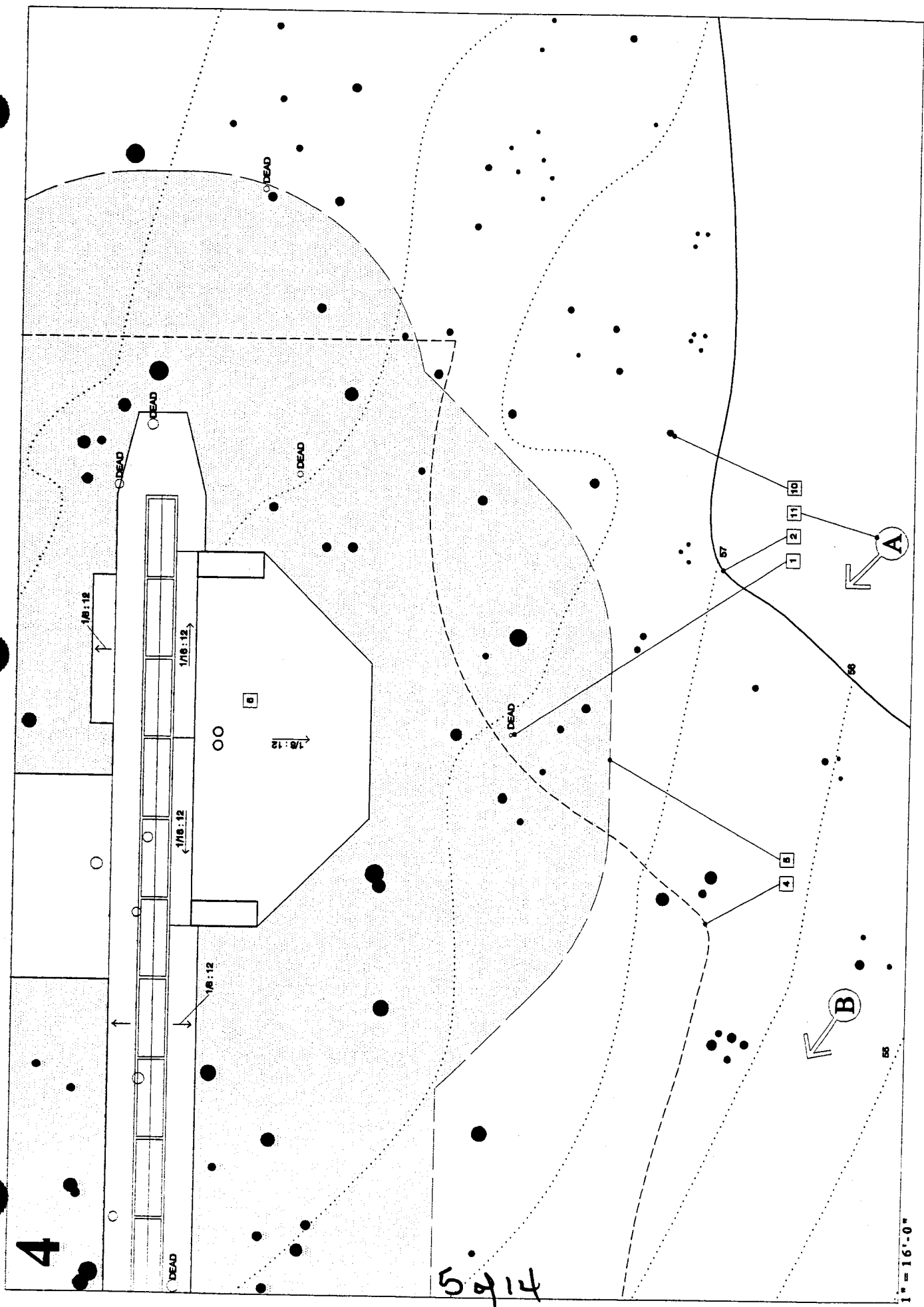


2914







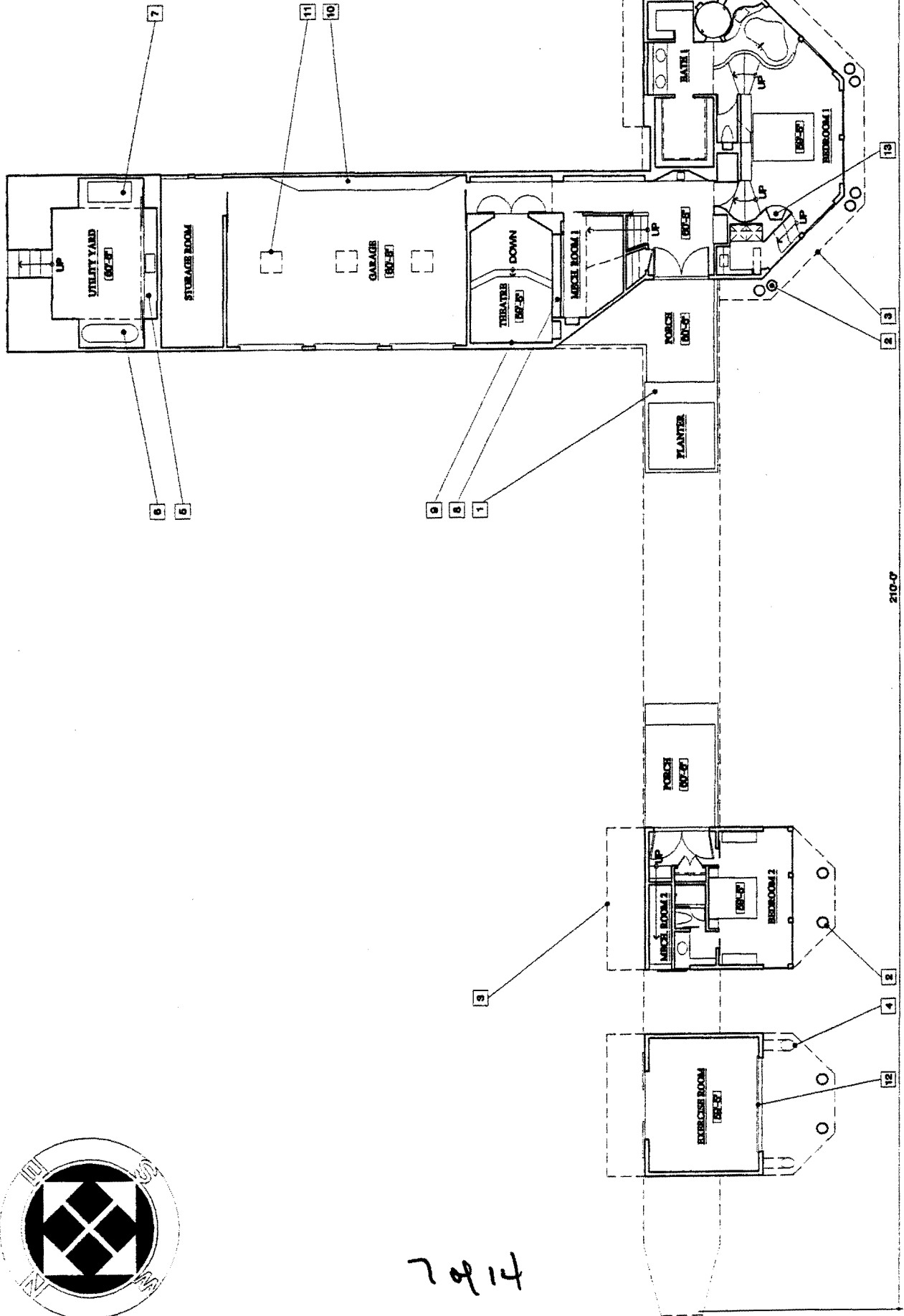


SITE PLAN NOTES



INDICATES NOTE BELOW AS MARKED ON DRAWINGS.

1. DEAD TREES REMOVED WITHIN 30' BUILDING SETBACK AS MARKED.
2. EDGE OF COASTAL BLUFF.
3. EXISTING GRADES.
4. PROPOSED 18,000 SQUARE FOOT BUILDING ENVELOPE WITH 35'-0" BLUFF SETBACK.
5. REMOVE DEAD BRANCHES WITHIN 10' OF GROUND AND ALL DEAD TREES WITHIN 30' DEFENSIBLE SPACE BUFFER (SHADED) PER CDF.
6. PROPOSED BUILDING ROOF PLAN.
7. APPROXIMATE RIPARIAN AREA 50'-0" SETBACK.
8. PROPOSED DRIVEWAY AND TURNAROUND.
9. MENDOCINO COAST PAINTBRUSH AND 50'-0" SETBACK.
10. EXISTING LIVE TREES REMAIN EXCEPT WITHIN BUILDING DRIPLINE OR DRIVEWAY.
11. PHOTO REFERENCES.
12. SEE INSET SHEETS 1-4 FOR CLOSE-UPS OF SITE PLAN AND 30' CDF SETBACK.



MEREDITH RESIDENCE
 17230 OCEAN DRIVE, FORT BRAGG, CA 95437

FIRST FLOOR PLAN
 1" = 20'-0"

7214

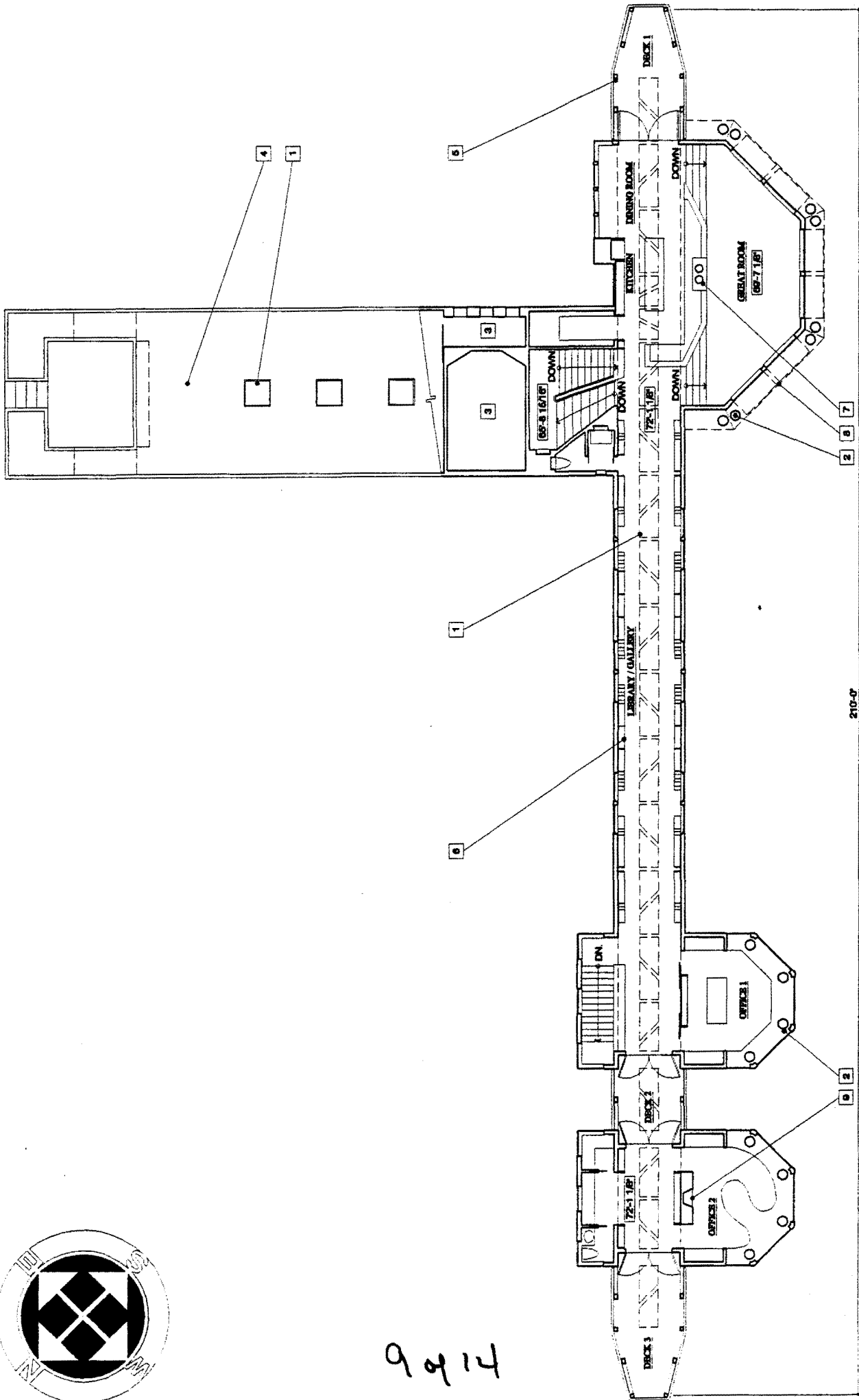
FIRST FLOOR PLAN NOTES

1. BENCH/LOW WALL.
2. 18" Ø CONCRETE COLUMNS.
3. LINE OF OVERHANG ABOVE.
4. KNEEBRACES ABOVE.
5. POTTING AREA.
6. PROPANE TANK.
7. EMERGENCY POWER GENERATOR.
8. SALTWATER AQUARIUM.
9. PROJECTION SCREEN.
10. STORAGE CABINETS.
11. SKYLIGHTS.
12. SECTIONAL GLASS DOOR.
13. ZERO CLEARANCE PROPANE FIREPLACE.

8 of 14



9914



SECOND FLOOR PLAN

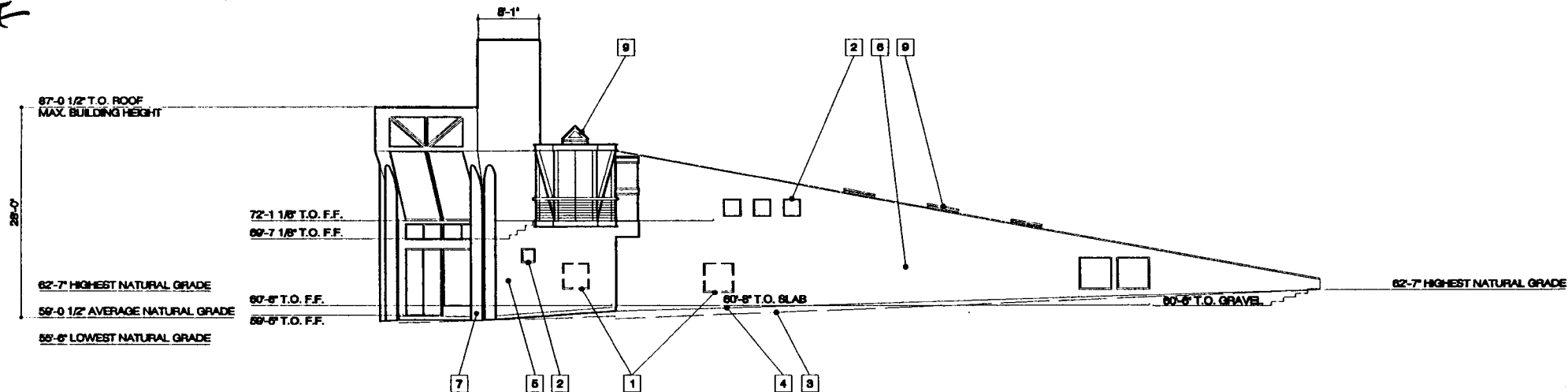
1" = 20'-0"

MEREDITH RESIDENCE
17230 OCEAN DRIVE, FORT BRAGG, CA 95437

SECOND FLOOR PLAN NOTES

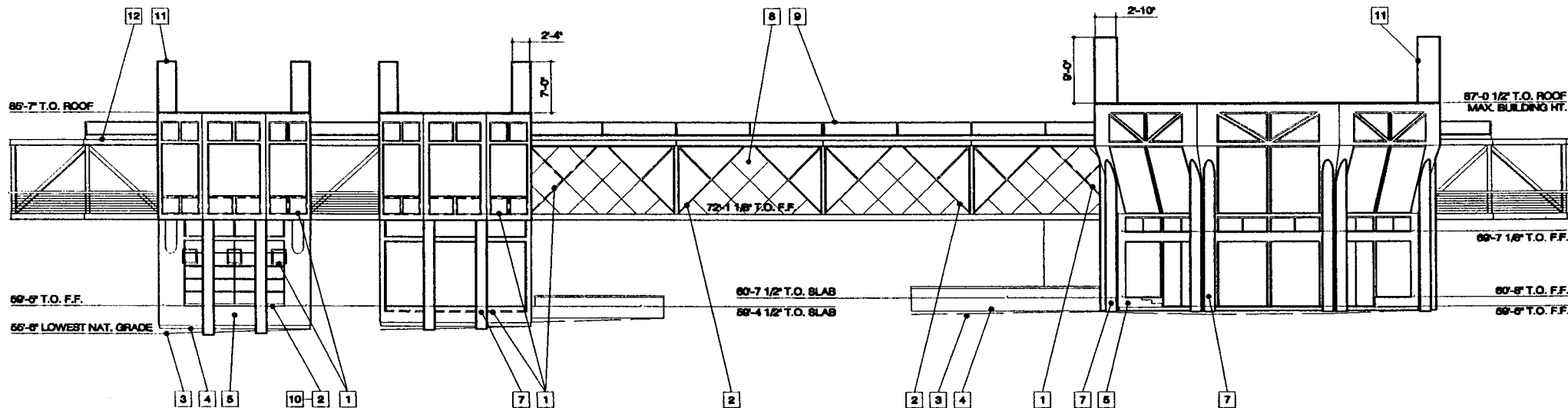
1. SKYLIGHTS.
2. 18" Ø CONCRETE COLUMNS.
3. OPEN TO BELOW.
4. EARTH ROOF BELOW.
5. STRUCTURAL TRUSS MEMBER. SEE DETAILS.
6. SHELVES AND/OR CABINETS BELOW.
7. INSULATED FLUES WITH RUMFORD MASONRY FIREPLACE BELOW.
8. LINE OF ROOF OVERHANG.
9. ZERO-CLEARANCE PROPANE FIREPLACE.

11/14



SOUTHEAST ELEVATION

1" = 20'-0"



SOUTHWEST ELEVATION

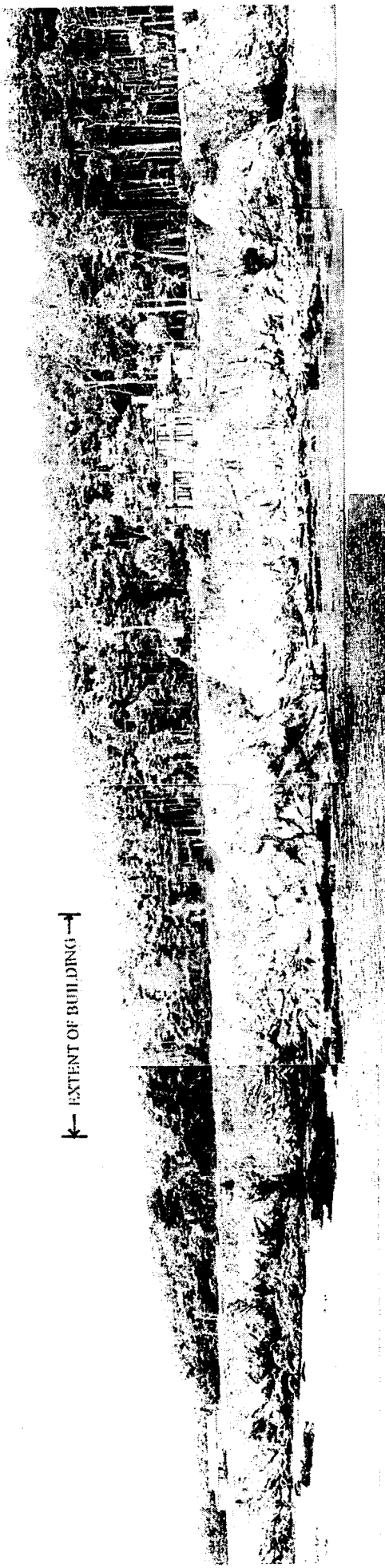
1" = 20'-0"

MEREDITH RESIDENCE
17230 OCEAN DRIVE, FORT BRAGG, CA 95437

ELEVATION NOTES

1. OMITTED GLAZING.
2. NEW GLAZING.
3. EXISTING GRADE.
4. FINISHED GRADE.
5. CORRUGATED COPPER CLADDING.
6. CONCRETE.
7. 18" Ø CONCRETE COLUMNS.
8. STAINED CEMENT BOARD CLADDING.
9. SKYLIGHTS.
10. SECTIONAL GLASS DOOR.
11. PASSIVE COOLING / VENTILATION CHIMNEYS.
12. CANTILEVERING DECKS / TRUSSES.

12 of 14



13 of 14



A - NORTH COAST VIEW FROM JUGHANDLE STATE RESERVE



B - VIEW ALONG BLUFF LOOKING NORTHWEST



C - VIEW ALONG BUILDING LONG AXIS

14 w 14



State of California • The Resources Agency

DEPARTMENT OF PARKS AND RECREATION
Mendocino District
PO Box 440
Mendocino, CA 95460

EXHIBIT NO. 5

APPLICATION NO.
1-89-028-A3

MEREDITH

STATE PARKS'
LETTER (1 of 2)

RECEIVED

July 9, 2002

JUL 10 2002

Randall Stemler
California Coastal Commission
North Coast District Office
710 E Street, Suite 200
Eureka, Ca 95501

CALIFORNIA
COASTAL COMMISSION

re: Meredith Appeal A-1-MEN-01-051

Dear Mr. Stemler :

State Parks submits the following comments to clarify and update the comments submitted to Charles Hudson and the Mendocino County Planning Department on January 29, 2001. The Meredith project appears to have the potential for a significantly greater visual impact from Jug Handle State Reserve than we were initially led to believe.

State Parks staff met with the applicant and agents and reviewed the plans on December 20, 2000, following which our staff visited the site to assess visual impacts. The agents assured us at that time that no more than nine small trees would be removed to accommodate the project. The building dimensions were not defined on site, nor do the plans submitted to us indicate the intended bluff setback or any building dimensions. It is surprising that even now no story poles have been erected to provide a clear indication of the potential visual impacts, particularly of the southwestern façade 210 feet in length and 28 feet in height, with six 37-foot vents.

Subsequent to our meeting with the applicant and agents, they appear to have amended their application (Request # 1-89-028-A3) to reduce the bluff setback from 75 to 35 feet, to enlarge the building envelope from 10,000 to 18,000 square feet and place it within the grove of Bishop pines, and to reduce the tree removal setback along the south parcel boundary from 150 to 70 feet. All of these amendments change the character of the project and significantly increase the potential for visual impacts from Jug Handle State Reserve.

Of greatest concern to us is that, if the building is to be sited within 35 feet of the bluff's edge and if California Department of Forestry and Fire Protection requires extensive clearing and fuel reduction within a 30-foot radius of the house, this will significantly reduce the vegetative screening needed to camouflage the structure from public views in the park.

In light of these concerns, State Parks concurs with the California Coastal Commission that there are substantial issues raised by this project with regard to potential visual impacts, height limitations in the highly scenic coastal corridor (typically 18 foot maximum) and bluff setback (typically 75 feet).

At the very least, State Parks recommends additional conditions, deeded in perpetuity, requiring the maintenance of at least 18 shore pines (*Pinus contorta*) along the southwestern bluff edge and 18 Bishop pines (*Pinus muricata*) between the building and the shore pines, along the entire length of the southwestern façade of the building to screen it from the park. State Parks also recommends the use of non-reflective glass and non-reflective surfaces along the southwestern elevation to prevent glare, especially in the afternoon, toward sunset, and the use of interior and exterior indirect downcast lighting and dark earth-tone exterior colors that recede into the surrounding woodlands.

Hopefully this letter provides a more accurate picture of the nature of the concerns that State Parks has regarding the proposed Meredith project, and hopefully our suggestions will help the Coastal Commission make an equitable determination of the merits of the project. Feel free to contact me at (707) 937-5804 x 110 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Ron Munson", with a stylized flourish at the end.

Ron Munson
Chief Ranger

2 of 2

N 1

10.6 Acres

Parcel # 017-330-10

BUILDING ENVELOPE

Existing Approved ———

Proposed ———

Pacific Ocean

Pine
Cove
Beach

Mitchell Creek

Coastal Headlands
of
Jug Handle State Reserve

EXHIBIT NO. 6

APPLICATION NO.
1-89-028-A3

MEREDITH

AERIAL PHOTO

