CALIFORNIA COASTAL COMMISSION

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Staff Report:	September 22, 2005
Hearing Date:	October 12-14, 2005
Commission Action:	

STAFF REPORT: REGULAR CALENDAR

APPLICATION NUMBER: 5-05-221

APPLICANT: City of Newport Beach Public Works Department

AGENT: RBF Consulting, Attn: Richard Beck

PROJECT LOCATION: Morning Canyon (located below the intersection of Surrey Drive and Rockford Road), City of Newport Beach (Corona Del Mar), Orange County

PROJECT DESCRIPTION: Slope stabilization and restoration of Morning Canyon by constructing seven grade control structures, restoring the eroded canyon bottom to its previous bed elevation and reducing the potential for adjacent slope failures, removal of exotic plant species and re-vegetation with native plant species.

LOCAL APPROVALS RECEIVED: Approval-in-Concept No. 1470-2005 by the City of Newport Beach dated June 9, 2005

SUMMARY OF STAFF RECOMMENDATION:

The applicant is proposing to stabilize and restore Morning Canyon by constructing seven grade control structures, restoring the eroded canyon bottom to its previous bed elevation and reducing the potential for adjacent slope failures, removing exotic plant species and re-vegetation with native plant species, located inland of Pacific Coast Highway in Corona del Mar (Newport Beach). The site is currently undeveloped with a natural drainage, bounded by existing residential developments on both sides of the creek. Primary issues addressed in this staff report include assurance that the proposed development is consistent with the geologic hazard policies of the Coastal Act, as well as assuring that the development is consistent with the biological resource protection policies of the Coastal Act including but not limited to the protection of environmentally sensitive habitat areas (ESHA).

Staff is recommending **APPROVAL** of the proposed project subject to nine (9) special conditions requiring: 1) conformance with engineering recommendations; 2) conformance with general construction responsibilities; 3) submittal of a final restoration and monitoring program; 4) U.S. Army Corps Of Engineers approval; 5) other agency

approvals; 6) materials, maintenance and monitoring of proposed grade control structures; 7) assumption of risk; 8) future development be submitted for review by the Commission or applicable certified local government agency; and 9) a deed restriction against the properties, referencing all of the special conditions contained in this staff report.

SUBSTANTIVE FILE DOCUMENTS: City of Newport Beach Land Use Plan; *Results of Investigation Slope Damage Wynkoop and Walton Properties*, prepared by Douglas E Moran, Inc. dated January 29, 1999; *Hydrologic, Geomorphic, Hydraulic and Geotechnical Findings* prepared by Lockwood-Singh & Associates dated February 1, 1999; *Preliminary Geotechnical Report* prepared by Lotus Consulting Engineers, Inc., dated September 25, 2000; *Geotechnical Evaluation and Recommendations for Repair of Slope Failure* prepared by Geofirm, dated May 28, 2003; *Findings of Biological Constraints Analysis* prepared by LSA Associates, Inc., dated May 27, 2004; *Morning Canyon Stream Stability and Channel Restoration Study* prepared by RBF Consulting, dated March, 2005; *Notice of Exemption* prepared by the City of Newport Beach, dated March 22, 2004; *Risk Assessment, Embankment Failure Along Morning Canyon, Westerly of Rockford Road, Newport Beach, California*, prepared by Leighton Consulting, Inc. dated August 8, 2005.

STAFF RECOMMENDATION:

Staff recommends that the Commission **APPROVE** the permit application with conditions.

MOTION: ***I move that the Commission approve Coastal Development Permit No. 5-05-221 pursuant to the staff recommendation.***

STAFF RECOMMENDATION OF APPROVAL:

Staff recommends a **YES** vote. Passage of this motion will result in approval of the permit as conditioned and adoption of the following resolution and findings. The motion passes only by affirmative vote of a majority of the Commissioners present.

RESOLUTION TO APPROVE THE PERMIT:

I. APPROVAL WITH CONDITIONS

The Commission hereby **APPROVES** a coastal development permit for the proposed development and adopts the findings set forth below on grounds that the development as conditioned will be in conformity with the policies of Chapter 3 of the Coastal Act and will not prejudice the ability of the local government having jurisdiction over the area to prepare a Local Coastal Program conforming to the provisions of Chapter 3. Approval of the permit complies with the California Environmental Quality Act because either 1) feasible mitigation measures and/or alternatives have been incorporated to substantially lessen any significant adverse effects of the development on the environment, or 2) there are no further feasible mitigation measures or alternatives that would substantially lessen any significant adverse impacts of the development on the environment.

II. STANDARD CONDITIONS

1. Notice of Receipt and Acknowledgment. The permit is not valid and development shall not commence until a copy of the permit, signed by the permittee or authorized agent, acknowledging receipt of the permit and acceptance of the terms and conditions, is returned to the Commission office.

2. Expiration. If development has not commenced, the permit will expire two years from the date this permit is reported to the Commission. Development shall be pursued in a diligent manner and completed in a reasonable period of time. Application for extension of the permit must be made prior to the expiration date.

3. Interpretation. Any questions of intent or interpretation of any condition will be resolved by the Executive Director or the Commission.

4. Assignment. The permit may be assigned to any qualified person, provided assignee files with the Commission an affidavit accepting all terms and conditions of the permit.

5. Terms and Conditions Run with the Land. These terms and conditions shall be perpetual, and it is the intention of the Commission and the permittee to bind all future owners and possessors of the subject property to the terms and conditions.

III. SPECIAL CONDITIONS

1. Conformance with Engineering Recommendations

A. All final design and construction plans, grading and drainage plans, shall be consistent with all recommendations contained in the *Morning Canyon Stream Stability and Channel Restoration Study* prepared by RBF Consulting, dated March, 2005.

B. **PRIOR TO THE ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT**, the applicant shall submit, for the Executive Director's review and approval, evidence that an appropriate licensed professional has reviewed and approved all final design and construction plans and certified that each of those final plans is consistent with all of the recommendations specified in the above-referenced engineering evaluation approved by the California Coastal Commission for the project site.

C. The permittee shall undertake development in accordance with the approved final plans. Any proposed changes to the approved final plans shall be reported to the Executive Director. No changes to the approved final plans shall occur without a Commission amendment to this coastal development permit unless the Executive Director determines that no amendment is legally required.

2. General Construction Responsibilities

A. The permittee shall comply with the following construction-related requirements:

1. Prior to commencement of any work approved by this permit, a temporary barrier or work area demarcation (such as but not limited to flagging, staking or plastic mesh fencing) shall be placed along the edges of the construction areas and to prevent disturbance to areas that aren't part of the project. All temporary flagging, staking, fencing shall be removed upon completion of the development.
2. All areas disturbed and/or denuded by the project shall be stabilized using non-vegetative erosion controls such as mulching or fiber rolls/ground cover as well as native vegetation.
3. No construction materials, debris, or waste shall be placed or stored where it may encroach upon or enter the stream any storm drain.
4. Construction materials, chemicals, debris and sediment shall be properly contained and secured on site or upon adjacent existing paved areas to prevent the unintended transport of material, chemicals, debris, and sediment into habitat areas and coastal waters by wind, rain or tracking. Best Management Practices (BMPs) and Good Housekeeping Practices (GHPs) designed to prevent spillage and/or runoff of construction-related materials, and to contain sediment or contaminants associated with construction activity, shall be implemented prior to the on-set of such activity. BMPs selected shall be maintained in a functional condition throughout the duration of the project. A pre-construction meeting shall be held for all personnel to review procedural and BMP/GHP guidelines.
5. Disposal of debris and excess material. Debris and excess material shall be disposed or recycled at a legal disposal/recycling site. If the disposal site is located in the coastal zone, a coastal development permit or an amendment to this permit shall be required before disposal can take place unless the Executive Director determines that no amendment or new permit is required. No debris or excess material shall be placed on or within the canyon or stream.
6. Debris and sediment shall be removed from the construction areas as necessary to prevent the accumulation of sediment and other debris which may be discharged into habitat areas and coastal waters.
7. Any and all debris resulting from construction activities shall be removed from the project site within 24 hours of completion of construction.

3. Final Restoration and Monitoring Program

A. PRIOR TO ISSUANCE OF THIS COASTAL DEVELOPMENT PERMIT, the applicant shall develop, in consultation with the California Department of Fish and Game and U.S. Fish and Wildlife Service as appropriate, and submit for review and written approval of the Executive Director, a final detailed program designed by a qualified wetland biologist for restoration and monitoring of the project reach of Morning Canyon. Required restoration shall be at a minimum

ratio of 1:1 (restoration to impact). The restoration and monitoring program shall at a minimum include the following:

1. Plans for site preparation and invasive plant removal;

2. Restoration plan including planting design, plant palette, source of plant material, plant installation, erosion control;

3. Final Success Criteria. The restoration will be considered successful if the overall species composition and the vegetative cover of the dominant perennial species are similar to relatively undisturbed vegetation of the same type in nearby reference areas. The Army Corps of Engineers "50/20" rule shall be used to determine dominance. Species composition shall be considered similar if all the dominant species and at least 80% of the non-dominant species at the reference site are present at the restored site. The vegetative cover of dominant species at the restoration and reference sites will be compared with an appropriate statistical test. Random sampling of the restoration and reference sites will be done with sufficient replication to detect a 10% absolute difference in cover with 90% power with alpha=0.10. The cover of dominant species will be considered similar if there is no statistical difference (P>0.10) in the average cover of each dominant species between the two sites; or, if there is a statistically significant difference, it is no greater than 10% absolute cover;

4. The sampling design to be employed, an estimate of the sample variance, and a statistical power analysis to estimate the necessary number of samples to meet the requirements specified above. Power analysis software is available commercially and on the world wide web (e.g, http://www.stat.uiowa.edu/~rlenth/Power/index.html).

5. Provisions for assessing the initial biological and ecological status of the "as built" restoration site within 30 days of establishment of the site in accordance with the approved restoration program. The assessment shall include an analysis of the attributes that will be monitored pursuant to the program, with a description of the methods for making that evaluation.

6. Provisions for monitoring and remediation of the restoration site in accordance with the approved final restoration and monitoring program for a period of five years or until it has been determined that success criteria have been met or have failed to be met, whichever comes first.

7. Provisions for submission of annual reports of monitoring results to the Executive Director for the duration of the required monitoring period, beginning the first year after submission of the "as-built" assessment. Each report shall include copies of all previous reports as appendices. Each report shall be a cumulative report that summarizes all previous reports. Each report shall document the condition of the restoration with photographs taken from the same fixed points in the same directions. Each report shall also include a "Performance Evaluation" section where information and results from the monitoring program are used to evaluate the status of the stream/wetland restoration project in relation to the performance standards.

8. Provisions for submission of a final monitoring report to the Executive Director at the end of the final performance monitoring period. Final

performance monitoring shall take place after at least three years without remediation or maintenance other than weeding. The performance monitoring period shall either be five years or three years without maintenance or remediation, whichever is longer. The final report must be prepared in conjunction with a qualified wetlands biologist. The report must evaluate whether the restoration site conforms to the goals, objectives, and performance standards set forth in the approved final restoration program. The report must address all of the monitoring data collected over the monitoring period.

B. If the final report indicates that the restoration project has been unsuccessful, in part, or in whole, based on the approved performance standards, the applicant shall submit within 90 days a revised or supplemental restoration program to compensate for those portions of the original program which did not meet the approved performance standards. The revised restoration program, if necessary, shall be processed as an amendment to this coastal development permit.

C. The permittee shall monitor and remediate the stream/wetland restoration site in accordance with the approved monitoring program, including any revised restoration program approved by the Commission or its staff. Any proposed changes to the approved restoration and monitoring program shall be reported to the Executive Director. No changes to the approved restoration and monitoring program shall occur without a Commission amendment to this coastal development permit unless the Executive Director determines that no amendment is legally required.

4. U.S. Army Corps Of Engineers Approval

PRIOR TO COMMENCEMENT OF THE CONSTRUCTION AUTHORIZED BY THIS COASTAL DEVELOPMENT PERMIT, the permittee shall provide to the Executive Director a copy of a permit issued by the U.S. Army Corps of Engineers, or letter of permission, or evidence that no permit or permission is required. The applicant shall inform the Executive Director of any changes to the project required by the U.S. Army Corps of Engineers. Such changes shall not be incorporated into the project until the applicant obtains a Commission amendment to this coastal development permit, unless the Executive Director determines that no amendment is legally required.

5. Other Agency Approvals

PRIOR TO ISSUANCE OF THIS COASTAL DEVELOPMENT PERMIT, the permittee shall provide to the Executive Director a copy of a permit, or letter of permission, or evidence that no permit or permission is required for the project by the following entities: California Department of Fish and Game; U.S. Fish and Wildlife Service; Regional Water Quality Control Board. The applicant shall inform the Executive Director of any changes to the project required by the California Department of Fish and Game; U.S. Fish and Wildlife Service; Regional Water Quality Control Board. Such changes shall not be incorporated into the project until the applicant obtains a Commission amendment to this coastal development permit, unless the Executive Director determines that no amendment is legally required.

6. Materials, Maintenance and Monitoring of Proposed Grade Control Structures

A. The permittees shall maintain the grade control structures in good condition throughout the life of the development. PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicants shall submit a Maintenance and Monitoring Plan, for the review and approval of the Executive Director. The permittee, and their successors in interest shall be responsible for carrying out all provisions of the approved Maintenance and Monitoring Plan for as long as the grade control structures remain in place. The maintenance and monitoring plan, at a minimum, shall provide for:

(1) Regular inspections by a licensed engineer. These inspections shall be performed at least every year for the first 12 years after the grade control structures have been installed, and following every storm event generating flows in excess of the 25-year event, or at least every three years thereafter.

(2) The inspections shall examine the exposed portions of the grade control structures (to the streambed) for signs of weakness or possible failure, including, but not limited to cracking, bending, splitting, splintering, or flaking. All weak or potential failure areas shall be marked on an as-built plan of the grade control structures, and there shall be photographs and text to explain the nature and extent of each weakness. The inspections shall examine the adjacent stream banks and the streambed for signs of erosion, scour, flanking or other channel damage that may indicate future instability of the drop structures.

(3) Inspection reports shall be prepared and conveyed to the Executive Director within 30 days of the inspection work. These reports shall provide information on and photographs from the date of the inspection, the name and qualifications of the person performing the inspection, and an overall assessment of the continued integrity of the grade control structures. If the inspection identifies any areas where the grade control structures have been damaged, the report shall identify alternatives to remedy the damage.

B. In the event that any areas of the stream channel should erode, scour, flank or indicate other signs of instability or if sections of the grade control structures are damaged or flaking, the permittees shall notify the Commission within 10 days; and in such event, within 30 days of such notification, submit to the Commission a complete application for any coastal development permit amendment, or new permit, necessary for the repair or replacement of the grade control structures or repairs to the integrity of the stream channel. The permittee shall carry out the work approved in any such permit or amendment in a timely manner.

7. Assumption of Risk, Waiver of Liability and Indemnity

By acceptance of this permit, the applicant and each landowner acknowledges and agrees (i) that the site may be subject to hazards from slope creep, soil movement and erosion; (ii) to assume the risks to the applicant and landowners and the properties that are the subject of this permit of injury and damage from such hazards in connection with this permitted development; (iii) to unconditionally waive any claim of damage or liability against the Commission, its officers, agents, and employees for injury or damage from such hazards; and (iv) to indemnify and hold harmless the Commission, its officers, agents, and employees with respect to the Commission's approval of the project against any and all liability, claims, demands, damages, costs (including costs and fees incurred in defense of such claims), expenses, and amounts paid in settlement arising from any injury or damage due to such hazards.

8. Future Development

This permit is only for the development described in Coastal Development Permit No. 5-05-221. Pursuant to Title 14 California Code of Regulations Section 13253(b)(6), the exemptions otherwise provided in Public Resources Code Section 30610(b) shall not apply to the development governed by Coastal Development Permit No. 5-05-221. Accordingly, any future improvements to the development authorized by this permit, including but not limited to repair and maintenance identified as requiring a permit in Public Resources Section 30610(d) and Title 14 California Code of Regulations Sections 13252(a)-(b), shall require an amendment to Permit No. 5-05-221 from the Commission or shall require an additional coastal development permit from the Commission or from the applicable certified local government.

9. Generic Deed Restriction

PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicant shall submit to the Executive Director for review and approval documentation demonstrating that the landowner(s) have executed and recorded against the parcel(s) governed by this permit a deed restriction, in a form and content acceptable to the Executive Director: (1) indicating that, pursuant to this permit, the California Coastal Commission has authorized development on the subject property, subject to terms and conditions that restrict the use and enjoyment of that property; and (2) imposing the Special Conditions of this permit as covenants, conditions and restrictions on the use and enjoyment of the Property. The deed restriction shall include a legal description of the entire parcel or parcels governed by this permit. The deed restriction shall also indicate that, in the event of an extinguishment or termination of the deed restriction for any reason, the terms and conditions of this permit shall continue to restrict the use and enjoyment of the subject property so long as either this permit or the development it authorizes, or any part, modification, or amendment thereof, remains in existence on or with respect to the subject property.

IV. FINDINGS AND DECLARATIONS

The Commission hereby finds and declares:

A. PROJECT DESCRIPTION

The proposed project (Morning Canyon) is located below the intersection of Surrey Drive and Rockford Road, inland of Pacific Coast Highway (PCH) within the City of Newport Beach, Orange County (Exhibit #1). The proposed project is located in a reach of the channel (upper canyon) that runs in a southwest direction, from the northern boundary (outlet from Pelican Hills Golf Course Detention Basin) to an existing reinforced concrete box culvert on PCH. The creek itself is a natural drainage system that has an urbanized tributary drainage area of approximately 365 acres at the PCH culvert. The creek is in an unimproved condition through the entire reach of the project site, and has been recently experiencing significant erosion and degradation. Morning Canyon is a steep-sided canyon bounded by existing residential developments along both sides of the creek. The Corona Highlands development is to the northwest and the Cameo Highlands development is located to the southeast. The residences are designated R-1 in the certified LUP. The property lines for each of the developments generally extend to the centerline of the canyon creek, which discharges into the ocean approximately ¼ mile south of the project site. The proposed project is inland of PCH and is not between the first public road and the sea. The nearest coastal access is available at Corona del Mar State Beach, approximately one-quarter mile from the subject site on the opposite side of PCH.

The proposed development consists of slope stabilization and reconstruction of Morning Canyon by constructing seven grade control structures, restoring the canyon bottom to its previous bed elevation and reducing the potential for adjacent slope failures, removal of exotic plant species and replacement with native plant species.
The grade control structures are proposed along the canyon to restore the stream invert to its original grade and to establish an equilibrium slope to prevent future erosion and bank failures. The grade control structures are proposed to be rock-filled gabion baskets and each structure would include a 3-foot vertical drop height and a length of approximately 35 feet. The banks of the gabion structures vary from 5 to 6 feet in height and are designed to contain the flow from a 100-year frequency storm event. The voids in the rock-filled gabion baskets are proposed to be backfilled with soil and re-vegetated to restore the canyon to a more natural channel system. Vegetation is proposed to be a mixture of native species including willows, mulefat, coast live oaks and California sycamores.

The project includes the use of approximately 800 cubic yards of earth fill to restore the canyon invert to its previous elevations and approximately 910 cubic yards of rock-filled gabion baskets to form the 7 grade control structures. Although no dewatering activities are anticipated, water would be diverted via pipe from the upstream portion of the project to downstream of the project activities. Diverted water is anticipated to be solely from urban runoff, which primarily includes residential uses and the Pelican Hills Golf Course.

Future maintenance activities for the proposed project are anticipated to be very minor, and would generally include annual inspections of the grade control structures, inspections after major storm events, routine general maintenance including debris and exotic vegetation removal and minor repairs to the wire mesh of the gabion baskets. Maintenance and repair would also include repair items identified during periodic inspections and emergency repair work.

Construction of the proposed project is anticipated to take 60 working days. Construction staging and equipment storage shall occur along Surrey Drive. Construction of the proposed project would occur from the north end of the project site. Access to the site would occur from Surrey Drive along the existing ingress/egress easement previously dedicated to the City of Newport Beach. Implementation of the project would require permanent and temporary easements from the adjacent properties along the streambed. A 22-foot drainage easement is currently dedicated from the properties along the southern side of the canyon. Additional easements have recently been obtained from the remaining properties on both sides of the canyon. A temporary construction access road is proposed to be graded to the channel invert within the existing ingress/egress easement. The access road is proposed to be a bladed earthen road that would be allowed to re-vegetate after construction.

Long-term access for maintenance operations is proposed to occur within the existing ingress/egress easement. Annual inspections and minor maintenance would include pedestrian access only. Major maintenance activities, if required, would require reconstruction of the bladed earthen roadway installed during the initial construction activities. The access route would be approximately 8 feet in width.

In developing the proposed project, the applicant's consultants examined several alternatives, as well as the no build alternative, which were developed, evaluated and selected based on their satisfaction of the following goals of the project:

- Restore the canyon gradient to an equilibrium condition to prevent further erosion and degradation;
- Reconstruct the canyon bed to the original grade to alleviate stability impacts to the adjacent development slopes;
- Minimize adverse environmental effects; and
- Increase water quality associated with post-project conditions.

The alternatives evaluated in detail include the no build alternative, gabion grade control alternative (proposed project), no elevation fill alternative, grouted riprap grade control alternative, vinyl pile grade control alternative, and the soil cement grade control alternative. Off-site alternatives beyond the immediate project reach were not evaluated due to the need to build the improvements in the canyon. The only alternative that met all the objectives and goals listed above was the proposed project (Gabion Grade Control).

B. HAZARDS

Section 30236 of the Coastal Act states,

> *Channelizations, dams, or other substantial alterations of rivers and streams shall incorporate the best mitigation measures feasible, and be limited to (1) necessary water supply projects, (2) flood control projects where no other method for protecting existing structures in the floodplain is feasible and where such protection is necessary for public safety or to protect existing development, or (3) developments where the primary function is the improvement of fish and wildlife habitat.*

Section 30253 of the Coastal Act states, in pertinent part:

> *New development shall:*
>
> *(1) Minimize risks to life and property in areas of high geologic, flood, and fire hazard.*
>
> *(2) Assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs.*

The applicant submitted the *Morning Canyon Stream Stability and Channel Restoration Study* prepared by RBF Consulting, dated March, 2005 and a *Risk Assessment, Embankment Failure Along Morning Canyon, Westerly of Rockford Road, Newport Beach, California* prepared by Leighton Consulting, Inc. dated August 8, 2005. Several hydrology, hydraulic, geomorphic and geotechnical analyses have been developed for Morning Canyon and its watershed in the past 15 years as a result of erosion, slope failures and property damage that has occurred along the canyon. The applicant has developed a whole scale stream restoration project for the upper Morning Canyon.

A sediment transport analysis was prepared for the project site by the applicant's consultants to develop the recommended improvements for the proposed project. The analysis was based on the current condition of the watershed that has been fully developed. The purpose of the analysis was to develop an equilibrium slope for the canyon, which is the slope that the channel invert would tend to adjust to based on the current watershed conditions. According to the applicant's consultants, the equilibrium slope was determined to be approximately 0.0025 feet per foot. Over the length of the project reach, this equilibrium slope could result in the lowering of the stream channel invert by up to 21 feet.

The theoretical analysis was checked with actual field conditions to determine the reasonableness of the predicted results. The construction of the Cameo Highlands development included the installation of a 51-inch diameter pipe, which outlets to the canyon via a box culvert energy dissipater at approximately the midpoint of the project reach. The outlet of the pipe was constructed at the invert of the canyon. After the

2004/2005 storm season, visual and topographic surveys of the canyon were performed by the applicant's consultants, which indicated that the invert of the canyon has dropped by approximately 10 feet at the outlet of the 51-inch storm drain. According to the applicant's consultants, this corresponds very closely with the predicted scour of 10.5 feet at this location. Currently, a vertical drop of approximately 7-8 feet exists just downstream of the pipe energy dissipater, which according to the applicant's consultants, is an unsafe condition, and any further erosion will result in the failure of the energy dissipater structure, and could result in the potential for significant property damage.

Stability analyses have been previously performed for the Cameo Highlands fill slope by Douglas E. Moran, Inc (1999), Lockwood-Singh & Associates (1999), Lotus Consulting Engineers (2000), and Geofirm (2003). According to the applicant's consultants, the results of these studies generally indicate that the factor of safety of these fill slopes is less than 1.25 and therefore prone to failure. The Lockwood-Singh study indicated that during the 1997/1998 El Nino years, the down cutting and undercutting process contributed to the failure of the Wynkoop and Walton slopes within the Cameo Highlands development. The erosion and degradation of the channel invert removed some subjacent lateral support for the fill slopes and further exacerbated the already unstable slopes. To minimize this problem, the proposed project includes the filling of the incised canyon to reconstruct the original channel grades.

As mentioned above, on August 11, 2005, the applicant's consultants submitted a risk assessment for the proposed project entitled "Risk Assessment, Embankment Failure Along Morning Canyon, Westerly of Rockford Road, Newport Beach, California" prepared by Leighton Consulting, Inc. This study concluded that within the stretch where the manufactured fill comprises the major portion of canyon side, the landsliding risk is very high. Almost certainly there will be massive landsliding even if the next rainy season produces moderate rain and stream flow. Where stream flow is contained within bedrock and the fill starts higher up on the canyon side, the potential for landsliding is moderate. Continued canyon downcutting increases the potential for landslides. Massive landsliding could occur during an extreme rainy season.

As a result of this study, the City of Newport Beach at their City Council Meeting on September 13, 2005, passed Resolution No. 2005-47 (Exhibit # 5), which declared the immediate stabilization of Morning Canyon to be a matter requiring emergency action and authorized the Public Works Director to award a contract for the proposed project. The City has decided to begin construction of the proposed project on Monday, October 3, 2005[1].

The proposed project is consistent with the engineering recommendations and designed to restore the canyon gradient to an equilibrium condition to prevent further erosion and degradation, reconstruct the canyon bed to the original grade to alleviate stability

[1] The Commission defines an emergency as a sudden unexpected occurrence demanding immediate action to prevent or mitigate loss or damage to life, health, property or essential public services. The circumstance at the proposed project site does not meet the Commission's definition of an emergency. Consequently, it must go through the regular permit process. The Commission staff recognizes that circumstances warrant expedited consideration of the application, thus the application was scheduled at the earliest possible hearing. Nevertheless, the matter didn't meet the circumstances required to issue an emergency permit. Furthermore, the applicant has not made a request for the Commission to issue an emergency permit.

impacts to the adjacent development slopes, minimize adverse environmental effects and increase water quality associated with post-project conditions. The recommended improvements utilize structural control measures (grade control structures) and modifications to the stream alignment and geometry and will provide 100-year level flood protection to the adjacent areas and will stabilize the streambed and channel banks while restoring the natural channel system.

According to the applicant's consultants, a total of seven grade control structures are required to stabilize and adjust the channel invert to the proper equilibrium slope (Exhibit #4) in order to maintain its sediment balance. The grade control structures will have a maximum drop height of 3 feet. Exhibit #2 shows the locations of the proposed grade control structures and Exhibit #3 shows the detail of the grade control structures. Rock filled gabion structures were selected because of their minimum of construction impacts, environmental sensitivity and they are economical with a long service life. The gabion structures are rock-filled wire baskets, which are stacked and tied together to form the grade control structure. The degraded, incised channel is proposed to be backfilled to reconstruct the original canyon grades. The gabions will be filled with soil and re-vegetated to restore the canyon to a more natural channel system.

The proposed project is designed to interlock with a previously approved project at 515 Place and 601 Rockford Road (5-03-503), which is a slope repair project at two lots along Morning Canyon, including reconstruction of an approximately 45 foot high slope with soil buttress and geogrid reinforcement, construction of a retaining wall at the top of the slope and re-vegetation with native plant material.

Section 30236 of the Coastal Act allows alterations of rivers and streams when required to protect existing development. Such projects must incorporate the best mitigation measures feasible. Section 30253 requires that risks to life and property in hazard areas are minimized, assures stability and structural integrity, doesn't contribute to erosion, instability or destruction of the area.

The Commission has found that in order to assure that the proposed development minimizes risks to life and property in areas of high geologic hazard and assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area the applicant shall be conditioned for: 1) conformance with engineering recommendations; 2) conformance with general construction responsibilities; 3) submittal of a final stream restoration and monitoring program; 4) U.S. Army Corps Of Engineers approval; 5) other agency approvals; 6) materials, maintenance and monitoring of proposed grade control structures; 7) assumption of risk; and 8) future development be submitted for review by the Commission or applicable certified local government agency; and 9) a deed restriction against the property, referencing all of the special conditions contained in this staff report. Only as conditioned does the Commission find that the proposed development is consistent with Sections 30236 and 30253 of the Coastal Act.

C. BIOLOGICAL RESOURCES

Section 30231 of the Coastal Act states:

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

Section 30236 of the Coastal Act states:

> *Channelizations, dams, or other substantial alterations of rivers and streams shall incorporate the best mitigation measures feasible, and be limited to (l) necessary water supply projects, (2) flood control projects where no other method for protecting existing structures in the floodplain is feasible and where such protection is necessary for public safety or to protect existing development, or (3) developments where the primary function is the improvement of fish and wildlife habitat.*

Newport Beach's certified Land Use Plan (LUP) discusses areas which are environmentally sensitive in nature and list Morning Canyon as an area which may contain environmentally sensitive habitat area. Morning Canyon is described as follows;

> *Located north and south of Pacific Coast Highway, between Shorecliffs and Corona Highlands, and Cameo Shores and Cameo Highlands in Corona del Mar, Morning Canyon is similar in character and function to Buck Gully. Like Buck Gully, Morning Canyon contains riparian vegetation at is base, sage scrub vegetation on the lower slopes, and a mixture of native and horticultural species on the upper slopes. A mixture of introduced grasses and forbs also exists in spots at the base of the canyon. Vegetation in Morning Canyon is most lush in the area below Pacific Cast highway, and progressively less well-developed farther up the canyon. Besides providing a high-quality wildlife habitat, Morning Canyon acts as a buffer for the Marine Life Refuge and provides a wildlife corridor to the Irvine coastal area.*

The proposed development is located along Morning Canyon in Corona del Mar. As cited above, the City's certified LUP identifies Morning Canyon as an area that may contain environmentally sensitive habitat area (ESHA). The project area also contains a stream that is afforded protections under Sections 30231 and 30236 of the Coastal Act.

Morning Canyon currently contains a majority of non-native plant species. The Commission advocates the preservation and reintroduction of native vegetation and discourages the introduction of non-native vegetation in coastal canyons. While no rare or endangered species have been reported to exist within the subject area, the City has indicated that Morning Canyon may contain environmentally sensitive habitat areas (ESHA) in the certified LUP. Coastal canyons act as open space and potential wildlife habitat, as well as corridors for native fauna. Decreases in the amount of native vegetation due to displacement by non-native vegetation have resulted in cumulative

adverse impacts upon the habitat value of the canyons. As such, the quality of canyon habitats must be assessed on a site-by-site basis.

It is necessary to obtain baseline information regarding existing vegetation and habitat value at the subject site in order to determine impacts of the proposed project. The applicant has submitted a report prepared by LSA Associates regarding biological resources within the entire Morning Canyon area (Exhibit #6). The City of Newport Beach has contracted with LSA to conduct this study to analyze the impacts of the proposed project. The study includes a detailed vegetation survey of the project area. The length of the drainage was surveyed for occurrences of native vegetation and the location of native plant species were recorded on an aerial photograph. The LSA analysis of Morning Canyon contains the following results:

> *The project site is located in a steep-sided canyon with residences on both sides. The rear yards of the residences are characterized as steep slopes down to the canyon bottom. Ornamental landscaping is the predominant vegetation within the yards adjacent to the drainage. Within the drainage itself, the vegetation is dominated by escaped and planted ornamental species combined with invasive nonnative species. Dominant species present within the drainage are myoporum (Myoporum laetum), garden nasturtiam (Tropaeolum majus) and giant reed (Arundo donax). Scattered occurrences of native species are shown on the attached figure. In some cases, these are natural "volunteer" occurrences; in other cases, such as some of the trees, they appear to have been planted by residents....*
>
> *...Given the nonnative nature of the vegetation, the location within a residential area, and the fact that the immediately adjacent area upstream is mostly developed with a golf course, it is highly unlikely that the project supports any special status or special interest plant or animal species...*
>
> *...With removal of nonnative plants and restoration of native habitat, Morning Canyon could provide increased habitat values to supplement the open space in the adjacent Newport Coast Planned Community.*

The canyon is considered somewhat degraded due to the predominance of non-native plant species. No portion of the area affected by the proposed development contains resources that presently rise to the level of ESHA. Thus, the protections established under Section 30240 of the Coastal Act are not applicable in this project. However, Section 30231 of the Coastal Act requires that the biological productivity and the quality of streams shall be maintained and, where feasible, restored; and Section 30236 of the Coastal Act requires that the best mitigation measures feasible shall be incorporated for the proposed project, which would protect public safety and existing development as well as improve habitat.

The previous section on geologic hazards includes findings to support 8 special conditions: including 1) conformance with engineering recommendations; 2) conformance with general construction responsibilities; 3) submittal of a final stream restoration and monitoring program; 4) U.S. Army Corps Of Engineers approval; 5) other agency approvals; 6) materials, maintenance and monitoring of proposed grade control structures; 7) assumption of risk; and 8) future development be submitted for review by the Commission or applicable certified local government agency; and 9) a

deed restriction against the property, referencing all of the special conditions contained in this staff report.

These conditions are necessary to ensure compliance with Section 30253 of the Coastal Act concerning geologic stability. Many of these are also necessary to ensure compliance with Section 30231 and 30236 of the Coastal Act concerning streams and biological resources.

Newport Beach's certified Land Use Plan (LUP) advocates the preservation of native vegetation and discourages the introduction of non-native vegetation in Morning Canyon. Coastal canyons act as open space and potential wildlife habitat, as well as corridors for native fauna. Decreases in the amount of native vegetation due to displacement by non-native vegetation results in an adverse impact upon habitat value of the canyons.

Because the proposed project will occur within a riparian area that drains to the ocean, proper care must be taken to prevent erosion and potential water quality impacts. As such, the Commission imposes Special Condition #2, which outlines construction responsibilities intended to prevent adverse impacts to the canyon. These responsibilities are discussed further in Section D. Special Condition #3 requires the applicant to submit a stream restoration and monitoring program, which establishes success criteria and a monitoring plan with the goal of increasing habitat value. Special Condition #8, the future development special condition, ensures that no development takes place that would adversely impact Morning Canyon. Due to its location within a drainage course, the project also requires review from the Department of Fish and Game (DFG) and Special Condition #5 requires the applicant to provide the approval of the DFG prior to issuance of this CDP.

The proposed development is within Morning Canyon, which is identified in the certified LUP as an area that may contain Environmentally Sensitive Habitat Area (ESHA). However, based on results of a site-specific analysis, the project location does not presently contain resources that rise to the level of ESHA. Nonetheless, the special conditions of this staff report described above are designed to protect and enhance Morning Canyon and to address requirements under Sections 30231 and 30236 of the Coastal Act and the certified LUP. Therefore, as conditioned, the Commission finds that the proposed development is consistent with Section 30231 and 30236 of the Coastal Act and the policies of the certified LUP.

D. WATER QUALITY

Section 30230 of the Coastal Act states, in pertinent part:

> *Marine resources shall be maintained, enhanced, and where feasible, restored.*

Section 30231 of the Coastal Act states:

> *The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of*

waste water discharges and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface water flow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.

Section 30232 of the Coastal Act states, in pertinent part:

Protection against the spillage of crude oil, gas, petroleum products, or hazardous substances shall be provided in relation to any development or transportation of such materials.

Storage or placement of construction materials, debris, or waste in a location which may be discharged into coastal waters via runoff carried by the storm water system would result in adverse impacts upon the marine environment that would reduce the biological productivity of coastal waters. For instance, construction debris entering coastal waters may cover and displace soft bottom habitat. In addition, the release of lubricants or oils from machinery may be toxic to marine life. Sediment discharged to coastal waters may cause turbidity which can shade and reduce the productivity of eelgrass beds and foraging avian and marine species' ability to see food in the water column.

Sedimentation could also have adverse impacts upon rocky intertidal resources known to be present at the beach at the mouth of Morning Canyon. In order to avoid adverse construction-related impacts upon marine resources, Special Condition #2 outlines construction-related requirements to provide for the safe storage of materials and the safe disposal of construction debris. The condition ensures that debris will not be allowed to enter the drainage course within Morning Canyon.

The applicant has applied for the necessary permits from the California Regional Water Quality Control Board (RWQCB), the California Department of Fish and Game (DFG) and the U.S. Army Corps of Engineers. Special Condition #4 requires the applicant to provide the U.S. Army Corps of Engineers approval Prior to commencement of the construction authorized by this CDP and Special Condition #5 requires the applicant to provide the approvals of the RWQCB and the DFG prior to issuance of this CDP.

After construction, the streambed within Morning Canyon will be restored and stream flow will continue unaltered. No post-construction impacts to water quality are proposed or anticipated. Only as conditioned for implementation of construction BMPs does the Commission find that the proposed development is consistent with Sections 30230, 30231 and 30232 of the Coastal Act.

E. GENERIC DEED RESTRICTION

To ensure that any prospective future owners of the properties are made aware of the applicability of the conditions of this permit, the Commission imposes one additional condition requiring that the property owners record a deed restriction against the properties, referencing all of the above Special Conditions of this permit and imposing them as covenants, conditions and restrictions on the use and enjoyment of the Properties. Thus, as conditioned, any prospective future owner will receive actual notice of the restrictions and/or obligations imposed on the use and enjoyment of the

land including the risks of the development and/or hazards to which the site is subject, and the Commission's immunity from liability.

F. LOCAL COASTAL PROGRAM

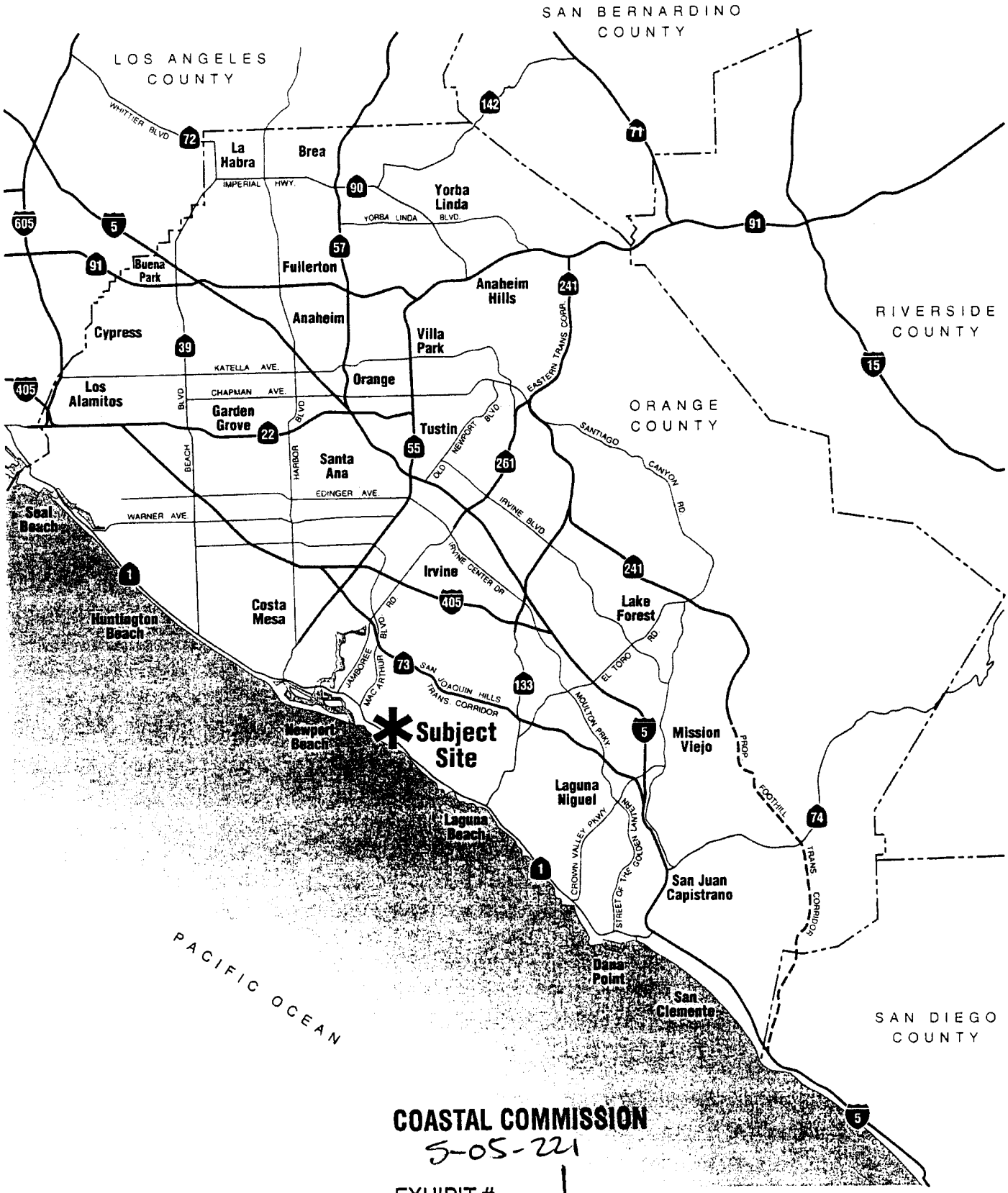
The LUP for the City of Newport Beach was effectively certified on May 19, 1982. The certified LUP was updated on January 9, 1990. As conditioned, the proposed development is consistent with Chapter 3 of the Coastal Act and with the certified Land Use Plan for the area. Approval of the project, as conditioned, will not prejudice the ability of the local government to prepare a Local Coastal Program that is in conformity with the provisions of Chapter 3.

G. CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)

Section 13096 of Title 14 of the California Code of Regulations requires Commission approval of Coastal Development Permits to be supported by a finding showing the permit, as conditioned by any conditions of approval, to be consistent with any applicable requirements of the California Environmental Quality Act (CEQA). Section 21080.5(d)(2)(A) of CEQA prohibits a proposed development from being approved if there are feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse effect that the activity may have on the environment.

The proposed project has been conditioned in order to be found consistent with the geologic hazards, water quality and biological resource protection policies of the Coastal Act. Mitigation measures, in the form of special conditions, require 1) conformance with geotechnical recommendations; 2) conformance with general construction responsibilities; 3) submittal of a final stream restoration and monitoring program; 4) U.S. Army Corps Of Engineers approval; 5) other agency approvals; 6) materials, maintenance and monitoring of proposed grade control structures; 7) assumption of risk; 8) future development be submitted for review by the Commission or applicable certified local government agency; and 9) a deed restriction against the property, referencing all of the special conditions contained in this staff report.

As conditioned, there are no feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse effect that the activity may have on the environment. Therefore, the Commission finds that the proposed project can be found consistent with the requirements of the Coastal Act to conform to CEQA.



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* Subject Site

RBF CONSULTING

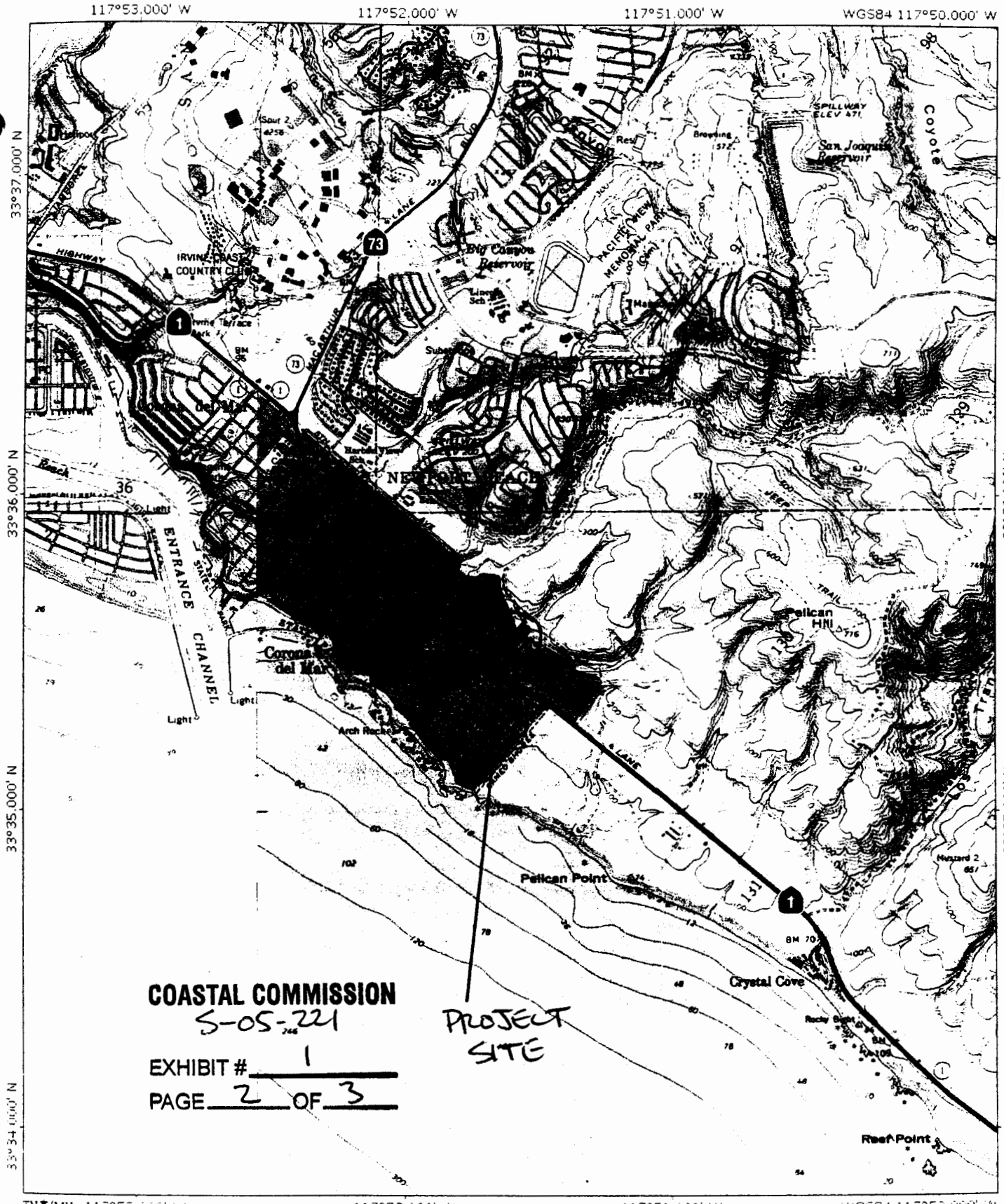
not to scale

MORNING CANYON • DELINEATION

Regional Vicinity

Exhibit 1

5/11/04 JN 10-103181-11151



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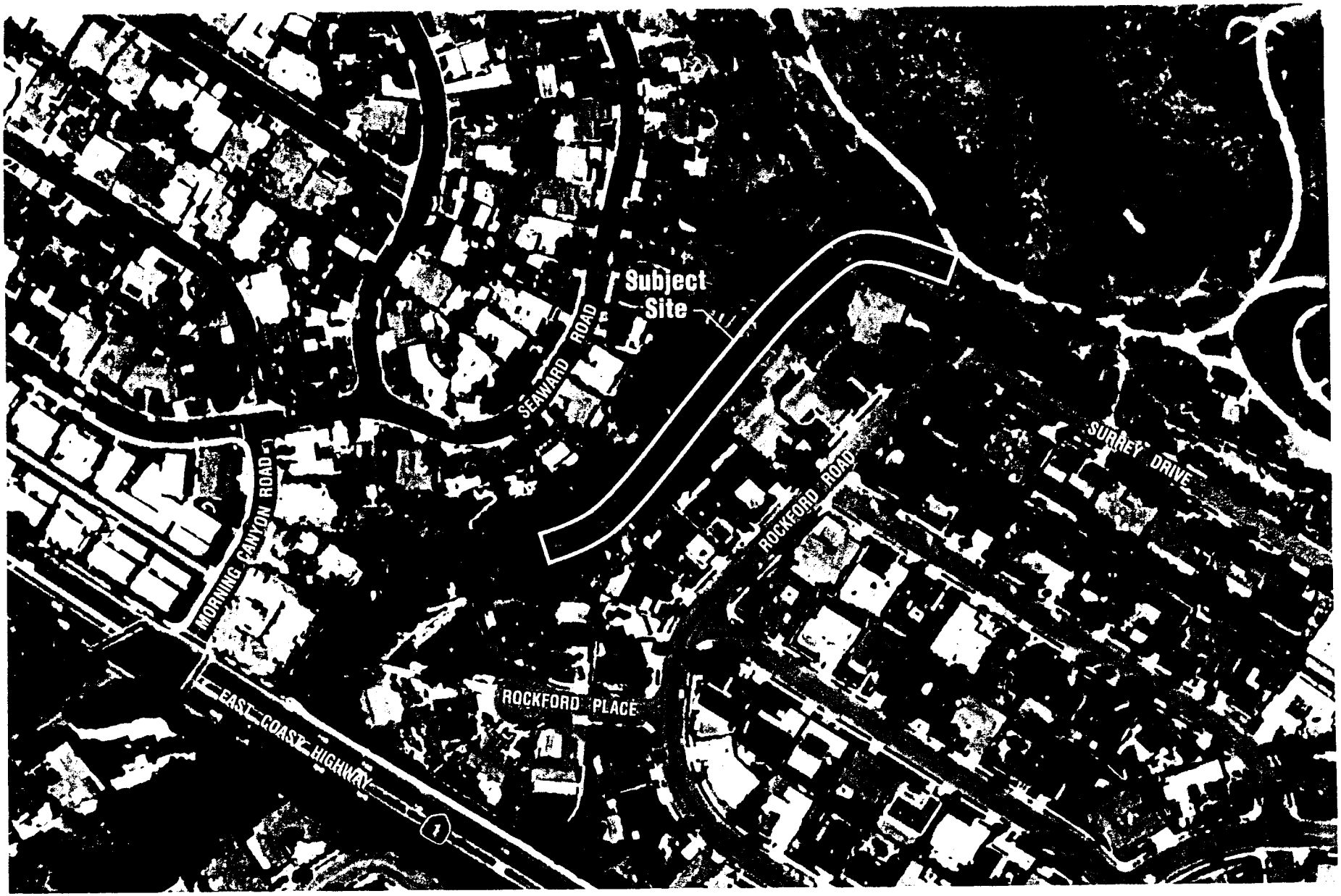
RBF CONSULTING

MORNING CANYON • DELINEATION

Site Vicinity

Exhibit 2



RBF CONSULTING

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MORNING CANYON • DELINEATION

Subject Site

Exhibit 3

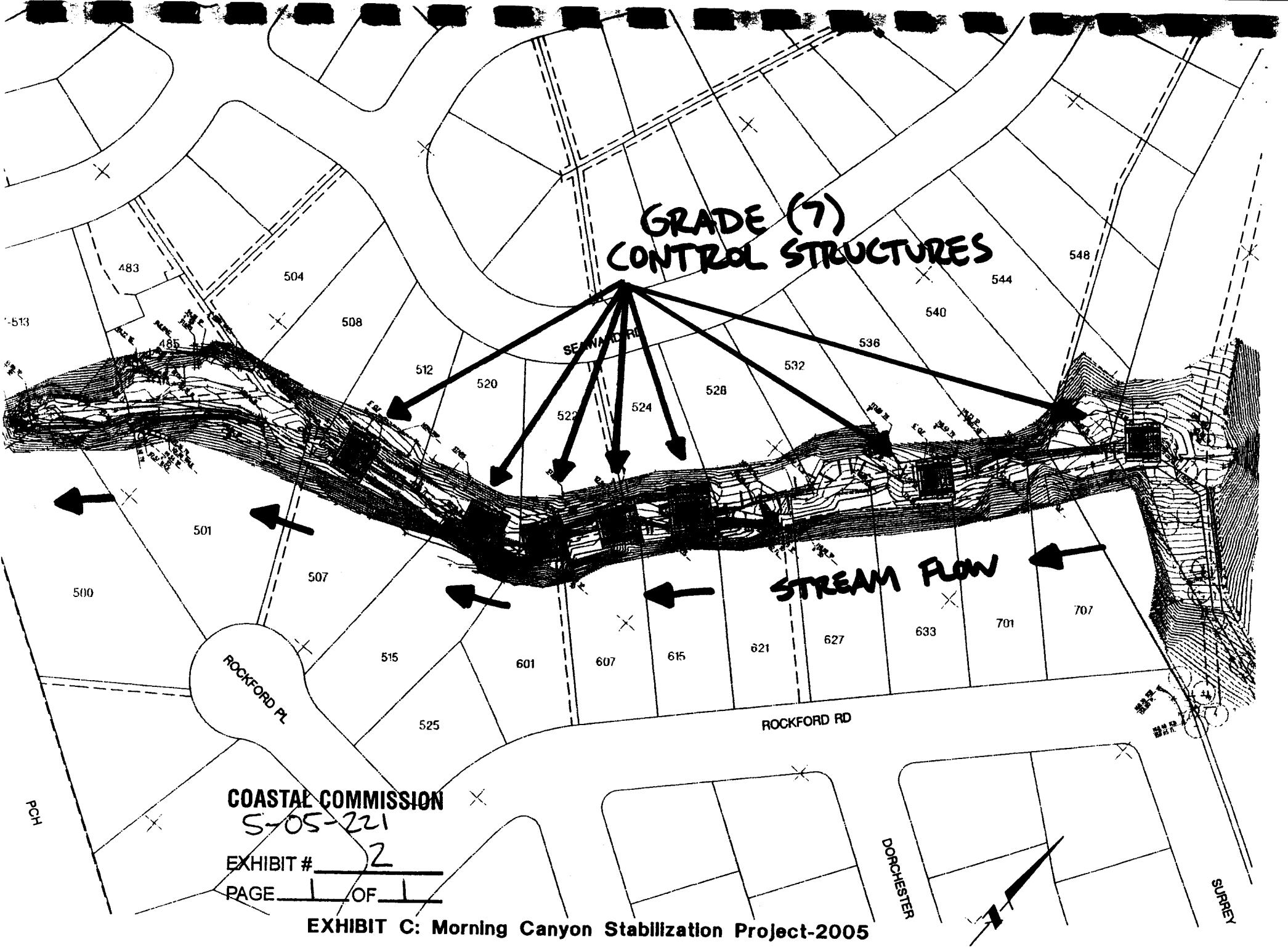

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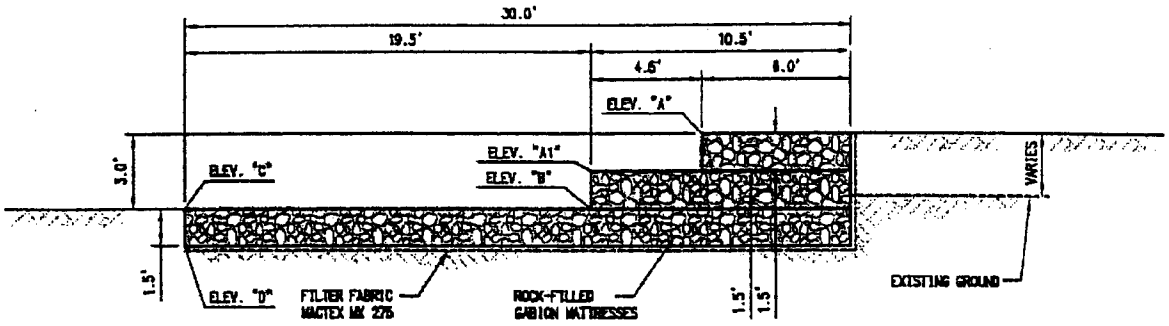
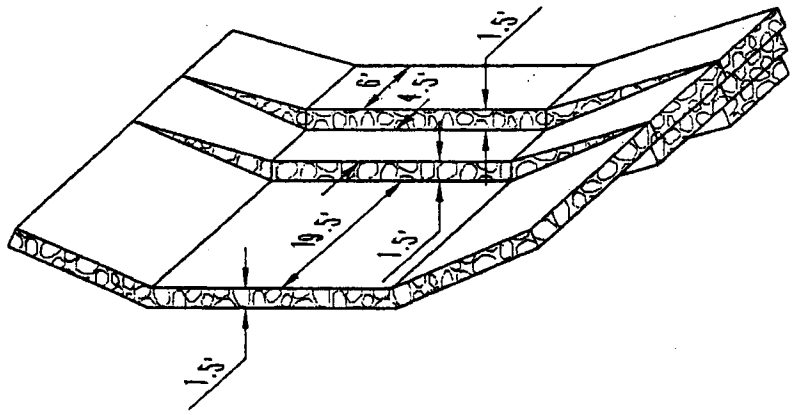
EXHIBIT C: Morning Canyon Stabilization Project-2005



Profile View



Isometric View

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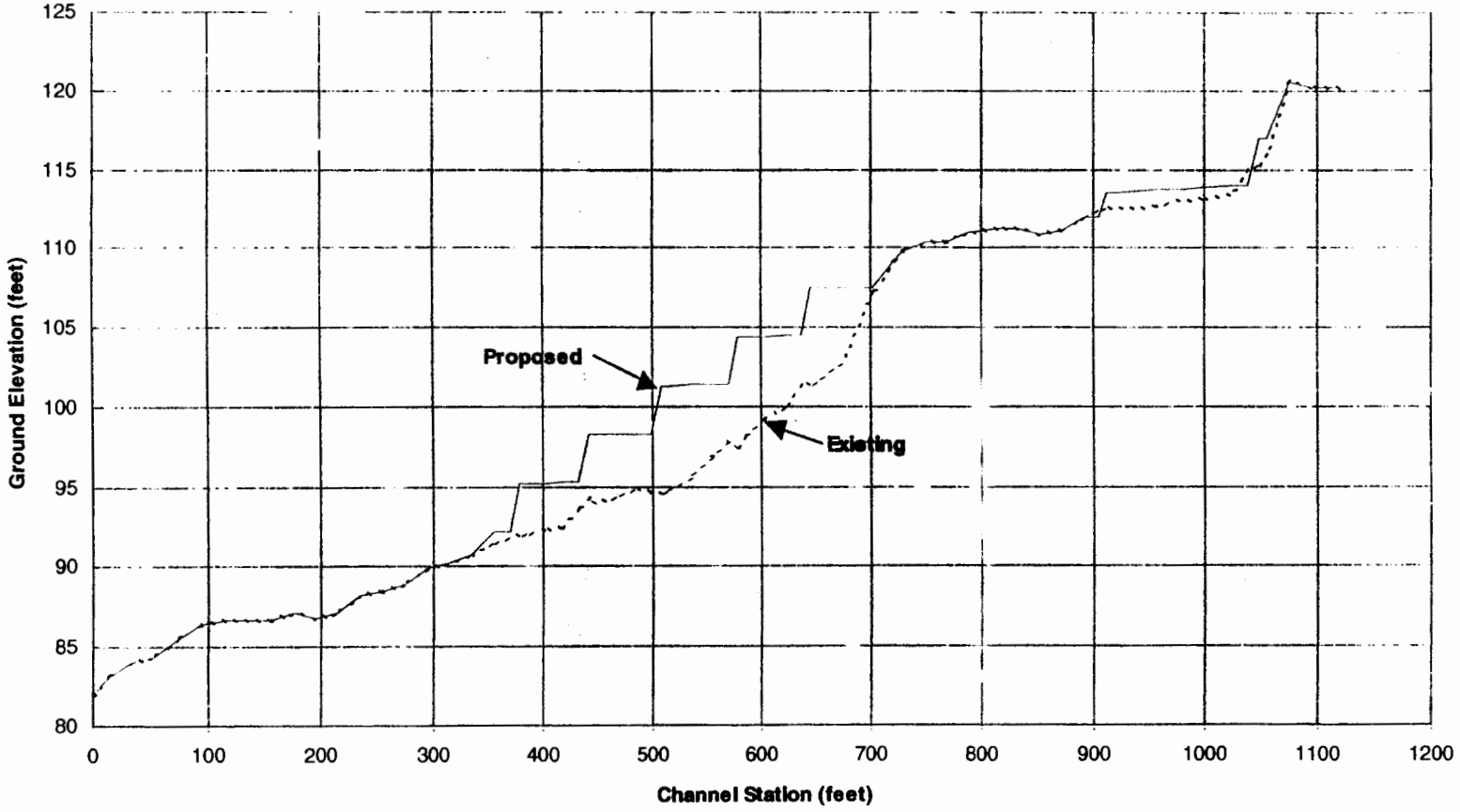
FIGURE 6. Channel Invert Comparison



RESOLUTION NO. 2005 - 47

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF NEWPORT BEACH DECLARING THE IMMEDIATE STABILIZIATION OF MORNING CANYON TO BE A MATTER REQUIRING EMERGENCY ACTION, CONFIRMING AUTHORIZATION OF THE PUBLIC WORKS DIRECTOR TO AWARD A CONTRACT FOR THE STABILIZATION OF THE CANYON , AND CONFIRMING THE AWARD OF THE CONTRACT TO SUNQUEST GENERAL ENGINEERING

The City Council finds and declares as follows:

WHEREAS, urban development in the Morning Canyon watershed over the past 60 years has reached a critical point such that the canyon bottom is rapidly eroding; and

WHEREAS, the fill material on the Cameo Highlands canyon slopes sits on a clay layer which in turn sits on an adversely inclined bed surface, and that this barely stable slope condition can be disrupted with minor amounts of infiltrated rainwater, and that the 2005 catastrophic Bluebird Canyon slope failure in Laguna Beach was due to a similar failure mode and resulted in substantial loss of property and endangered residents; and

WHEREAS, the risk assessment by Leighton Consulting, Inc. dated August 8, 2005, states that in Morning Canyon, especially "... where the manufactured fill comprises the major portion of canyon side, the landsliding risk is very high. Almost certainly there will be a massive landsliding even if the next rainy season produces moderate rain and stream flow"; and

WHEREAS, the storm season officially commences on October 15 and significant rainfall usually is expected no later than January; and

WHEREAS, a rigorous assessment of the canyon hydrodynamics and sediment transport has been performed and has been used as the basis for the preparation of engineered drawings and specifications to repair the canyon flood plain and install engineered gabion control structures to forestall future streambed erosion in an environmentally sensitive manner in accordance with best practices and in concert with the regulatory agencies; and

WHEREAS, the project will take approximately 60 days to complete; and

WHEREAS, permit applications have been submitted and approved by State Fish and Game, Army Corps of Engineers and Regional Water Quality Control Board; and

WHEREAS, the permit application with the California Coastal Commission (CCC) has been deemed complete and City staff has met with CCC staff to discuss the project, CCC staff cannot agendize the permit application to be heard before the

Commission until October 13 and such a delay will put the City in jeopardy of not being able to complete the project in advance of the expected storms within the winter rain season.

NOW THEREFORE, based upon the above findings, the City Council declares the conditions in Morning Canyon constitute an emergency situation and that staff is directed to:

1. Move forward with the Morning Canyon Stabilization Project so work can be completed in advance of the expected storms and
2. Continue working with California Coastal Commission staff to secure a Coastal Development Permit and make their best efforts to incorporate the conditions of the permit into the ongoing project.

Adopted this 13th day of September, 2005

Mayor

ATTEST:

City Clerk

CITY OF NEWPORT BEACH CALIFORNIA

COASTAL COMMISSION
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STATE OF CALIFORNIA }
COUNTY OF ORANGE } ss.
CITY OF NEWPORT BEACH }

I, LaVonne M. Harkless, City Clerk of the City of Newport Beach, California, do hereby certify that the whole number of members of the City Council is seven; that the foregoing resolution, being Resolution No. 2005-47 was duly and regularly introduced before and adopted by the City Council of said City at a regular meeting of said Council, duly and regularly held on the 13th day of September 2005, and that the same was so passed and adopted by the following vote, to wit:

Ayes: Selich, Rosansky, Webb, Ridgeway, Daigle, Nichols, Mayor Heffernan

Noes: None

Absent: None

Abstain: None

IN WITNESS WHEREOF, I have hereunto subscribed my name and affixed the official seal of said City this 14th day of September 2005.

LaVonne M. Harkless
City Clerk
Newport Beach, California

(Seal)

COASTAL COMMISSION
5-05-221
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LSA

LSA ASSOCIATES, INC.
20 EXECUTIVE PARK, SUITE 200
IRVINE, CALIFORNIA 92614-4731
949.553.0666 TEL
949.553.8076 FAX

BERKELEY
FORT COLLINS
POINT RICHMOND

RIVERSIDE
ROCKLIN
SAN LUIS OBISPO

May 27, 2004

Mr. Richard Beck
RBF Consulting
14725 Alton Parkway
Irvine, California 92618

Subject: Findings of Biological Constraints Analysis: Morning Canyon, Newport Beach, California

Dear Mr. Beck:

LSA Associates, Inc. (LSA) is pleased to submit to you this letter report addressing the biological resources associated with the subject property in Morning Canyon portion of Newport Beach between Pelican Hill Golf Club and Pacific Coast Highway. RBF Consulting (RBF) and the City of Newport Beach (City) are studying ways to deal with the stabilization of portions of this drainage.

METHODS

RBF has retained LSA to provide a constraints analysis relative to biological resources present within this portion of the canyon area. LSA biologists considered the potential for occurrence of sensitive plant and animal species on the project site or in the vicinity of the site as defined by the following: federal and State lists of sensitive species; current database records, including the *California Natural Diversity Database* (California Department of Fish and Game 2003) and the California Native Plant Society's *Electronic Inventory of Rare and Endangered Vascular Plants of California* (California Native Plant Society 2002); and other relevant sources. A list of the references is provided in Attachment B.

As part of a previous contract with another prime consultant to the City, LSA biologists Art Homrighausen and Jim Harrison conducted reconnaissance-level pedestrian surveys of the site on several occasions in 2002 to evaluate the area for the presence of potentially suitable habitat for sensitive species and to preliminarily identify areas that may be considered wetlands, waters of the U.S., or streambeds, as defined by the U.S. Army Corps of Engineers (Corps), and the California Department of Fish and Game (CDFG). More recently, On May 19, 2004, LSA biologist Chris Meloni performed a detailed vegetation survey of the project area. The length of the drainage was surveyed for occurrences of native vegetation. The locations of native plant species were recorded on an aerial photograph (attached).

RESULTS

The project site is located in a steep-sided canyon with residences on both sides. The rear yards of the residences are characterized as steep slopes down to the canyon bottom. Ornamental landscaping is the predominant vegetation within the yards adjacent to the drainage. Within the drainage itself, the vegetation is dominated by escaped and planted ornamental species combined with invasive nonnative

species. Dominant species present within the drainage are myoporum *(Myoporum laetum)*, garden nasturtium *(Tropaeolum majus)*, and giant reed *(Arundo donax)*. Scattered occurrences of native species are shown on the attached figure. In some cases these are natural "volunteer" occurrences; in other cases, such as some of the trees, they appear to have been planted by residents.

While there is very little native vegetation associated with the canyon, or the drainage course itself, the well-defined drainage course is virtually perennially wet and subject to the jurisdiction of the Corps and Regional Water Quality Control Board under the federal Clean Water Act, and CDFG under Section 1602 of the Fish and Game Code. The drainage course would almost certainly be viewed as a wetland by the California Coastal Commission under the Coastal Act, and some portions would meet the federal criteria for wetlands, as described in the Corps wetland delineation manual.

Given the nonnative nature of the vegetation, the location within a residential area, and the fact that the immediately adjacent area upstream is mostly developed with a golf course, it is highly unlikely that the project area supports any special status or special interest plant or animal species.

CONSTRAINTS AND OPPORTUNITIES

Due to the lack of native habitat, modification of the Morning Canyon drainage is not likely to have any impacts upon threatened or endangered species or other significant impacts. However, it would require authorizations from the Corps, CDFG, Regional Water Quality Control Board (RWQCB) and the Coastal Commission, and these agencies will likely require that the modification entail methods that allow vegetation to grow in most portions the channel. With removal of nonnative plants and restoration of native habitat, Morning Canyon could provide increased habitat values to supplement the open space in the adjacent Newport Coast Planned Community.

Thank you for the opportunity to assist you on this project. If LSA can be of further assistance, or if you have any questions concerning this report, please do not hesitate to call me at (949) 553-0666.

Sincerely,

LSA ASSOCIATES, INC.

Art Homrighausen
Principal

Attachments: References
Aerial Photograph

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