

F192

FORM FOR DISCLOSURE
OF EX PARTE
COMMUNICATIONS

Click here to go
to the staff report.

Date and time of communication: February 02, 2011, 8:08 a.m.

Location of communication: Received a forwarded e-mail from Fortuna City Hall
(If communication was sent by mail or
facsimile, indicated the means of transmission.)

Identity of person(s) initiating communication: Arne Blemker

Identity of person(s) receiving communication: Kenneth E. Zanzi

Name or description of project: Representing multiple applicants

Description of content of communication:
(If communication included written material, attach a copy of the complete text of the written
material.)

Requesting an hour ex parte discussion per attached e-mail.

Signature on file

January 8, 2011
Date

Signature of Commissioner

If communication occurred seven (7) or more days in advance of the Commission hearing on the item that was the subject of the communication, complete this form and transmit it to the Executive Director within seven (7) days of the communication. If it is reasonable to believe that the completed form will not arrive by U.S. mail at the Commission's main office prior to the commencement of the meeting, other means of delivery should be used, such as facsimile, overnight mail, or personal delivery by the Commissioner to the Executive Director at the meeting prior to the time that the hearing on the matter commences.

If communication occurred within seven (7) seven days of the hearing, complete this form, provide the information orally on the record of the proceeding and provide the Executive Director with a copy of any written material that was part of the communication.

APPENDIX 2

EX PARTE Communication

From: Anne Blemker [mailto:ablemker@mccabeandcompany.net]
Sent: Tuesday, February 01, 2011 5:33 PM
To: k zanzi
Subject: RE: February Briefing Request

Commissioner Zanzi,

Just following up to see if you'd be available for a briefing on any of the items listed below. Thanks for your time.

Anne

From: Anne Blemker
Sent: Thursday, January 27, 2011 9:35 AM
To: Ken Zanzi (kzanzi@ci.fortuna.ca.us)
Cc: Susan McCabe
Subject: February Briefing Request

Good Morning, Commissioner Zanzi;

We're representing multiple applicants at the upcoming February hearing and would appreciate an opportunity to brief you on the following items:

- **W18a:** Poseidon Resources, Condition Compliance for Marine Life Mitigation Plan
- **W14e:** Shea Homes-Parkside, CDP for geologic testing w/archaeological and Native American monitoring
- **Th14a:** City of San Diego LCPA Resubmittal, Pt. Loma Townhomes
- **Th15a:** Westbridge, Appeal of residential subdivision approved by City of Encinitas
- **F19a:** Seaworld, Construction of new manta ray ride/attraction

Due to the number of items we've got up, we'll probably need about an hour to discuss them all. We could either do that all in one briefing or break it into two separate calls. Please let me know your preference and availability.

Additionally, Susan suggested I arrange a separate time to get together aside from the ex parte

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briefings. If you're getting into San Diego on Tuesday evening before the hearing, perhaps we could all meet for coffee or drinks. Let me know if that might work for you.

Thank you,
Anne

Anne Blemker
McCabe & Company
Phone: 310-463-9888
10520 Oakband Drive
San Diego, CA 92131

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I. STAFF RECOMMENDATION:

The staff recommends the Commission adopt the following resolution:

MOTION: *I move that the Commission approve Coastal Development Permit No. 6-10-85 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:

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.

See attached page.

III. Special Conditions.

The permit is subject to the following conditions:

1. Revised Final Plans. **PRIOR TO THE ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT**, the applicant shall submit to the Executive Director for review and written approval, final site, building and elevation plans that have been approved by the City of San Diego, which shall clearly delineate the ride in its approved location. Said plans shall be in substantial conformance with the preliminary plans submitted by the applicant, titled "2012 Attraction", dated 12/02/10 by SeaWorld San Diego and shall include the following:

- a. **Coloration of Structure:** To minimize visibility from outside SeaWorld, those portions of the approved 'Manta Ray Ride' visible from outside the SeaWorld Park shall be finished in earth tone colors with no solid white or bright colors.

The permittees 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 an amendment to this coastal development permit unless the Executive Director determines that no amendment is legally required.

2. Final Landscape Plans. **PRIOR TO THE ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT**, the applicant shall submit to the Executive Director for review and written approval, final landscaping plans approved by the City of San Diego. The plans shall be in substantial conformance with the landscape plans submitted by the applicant titled "2012 Attraction", dated 12/02/10 by SeaWorld San Diego and shall include the following:

- a. All new landscaping shall be drought tolerant and native or non-invasive plant species. No plant species listed as problematic and/or invasive by the California Native Plant Society, the California Exotic Pest Plant Council, or identified from time to time by the State of California shall be employed or allowed to naturalize or persist on the site. No plant species listed as 'noxious weed' by the State of California or the U.S. Federal Government shall be utilized within the property.
- b. A written commitment by the applicants that five years from the date of the issuance of the coastal development permit for the residential structure, the applicants will submit for review and written approval of the Executive Director, a landscape monitoring report, prepared by a licensed Landscape Architect or qualified Resource Specialist, that certifies whether the on-site landscaping is in conformance with the landscape plan approved pursuant to this Special Condition. The monitoring report shall include photographic documentation of plant species and plant coverage.

If the landscape monitoring report indicates the landscaping is not in conformance with or has failed to meet the performance standards specified in the landscaping plan approved pursuant to this permit, the applicants, or their successors in interest, shall submit a revised or supplemental landscape plan for the review and written approval of the Executive Director. The revised landscaping plan must be prepared by a licensed Landscape Architect or Resource Specialist and shall specify measures to remediate those portions of the original plan that have failed or are not in compliance with the original approved plan.

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

3. Construction Access/Staging Area/Project Timing. **PRIOR TO THE ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT**, the applicant shall

submit plans showing all locations which will be used as staging and storage areas for materials and equipment during the construction phase of this project. The staging/storage plan shall be subject to review and written approval of the Executive Director. Use of public walkways and public parking areas, including on-street parking for the interim storage of materials and equipment shall not be permitted. If areas outside the leasehold are designated as staging/storage areas, or if construction will require any restrictions on traffic along Sea World Drive (such as lane closures), the plan shall also indicate that no work may occur during the summer months (Memorial Day weekend to Labor Day) of any year.

4. Future Development. When the documented annual attendance level at the SeaWorld Park reaches four million visitors, additional traffic and parking mitigation measures may be required for identified Tier 2 project and Special Project sites, pursuant to the SeaWorld Master Plan Update EIR.

IV. Findings and Declarations.

The Commission finds and declares as follows:

1. Detailed Project Description/History. The proposed project involves construction of a new attraction within the existing SeaWorld of California theme park leasehold. The proposed 'Manta Ray Ride' attraction consists of a riding track to accommodate a roller coaster type themed ride, three main support facility structures, and various accessory buildings providing visitor services and storage space for mechanical ride operations. The proposed primary support facility buildings are classified as Building No. 20, 21 and 10 within the building plans submitted by the applicant. Building 10 is an existing on site building, which would be slightly modified as part of this project, while Building 20 and 21 would be new development. As proposed, Building No. 20 consists of a two level, 30-ft. high, 9,900 sq. ft. loading/unloading ride launch, ride show, and ride maintenance facility. As proposed, Building 21 would be located directly adjacent to this ride launch facility and serve as a 2,620 sq. ft. one story restroom facility. Building No. 10 is an existing building removed from the immediate ride loading and unloading area that is proposed to undergo interior and exterior remodeling and function as a visitor serving gift shop, underwater aquarium viewing site, and mechanical operations center upon project completion. This 6,560 sq. ft., two level, 30-ft. high building would also house a marine conservation exhibit and be located adjacent to the existing 'Ray Pool' where the public can interact with live rays. The proposed project also involves some minor modifications to existing accessory structures including a restaurant (Building 12), a bell tower (Building 13), and an animal food sales and storage structure (Building 11). Demolition of two existing gift shops, one existing restaurant, an existing restroom, and an existing small storage building, cumulatively totaling 10,258 sq. ft., is also proposed with construction of the 'Manta Ray Ride' exhibit. The proposed area for the ride track and associated facilities will be located on an approximately 5 acre site that includes the existing Forbidden Reef exhibit and a 1.7 acre area identified as Site J-2 on Figure II-3 of the Sea World Master Plan Update (ref. Exhibit #3).

The SeaWorld Master Plan update was certified by the Commission in 2002 and addressed future development within the SeaWorld leasehold over the next 15-20 years. The SeaWorld Master Plan Update divided potential future projects into Tier 1, Tier 2, and Special Projects. The subject project area includes the existing Forbidden Reef exhibit area as well as an adjacent region shown as Site J-2 in the Sea World Master Plan Update that is identified as a Tier 2 exhibit/ride show project site. Tier 2 project sites are defined as candidates for redevelopment that have the potential to accommodate new rides or show exhibits but were sites that had no specific plans for development at the time the SeaWorld Master Plan Update was certified. This proposed theme ride project would occupy an approximately 5 acre site within the SeaWorld Park that currently contains food service type facilities as well as the 'Forbidden Reef' exhibit. The area of work is in compliance with all requirements and setbacks stipulated in the SeaWorld Master Plan, approved by the Commission on 02/07/02.

SeaWorld is located within Mission Bay Park in the City of San Diego. It is situated adjacent to Mission Bay and is surrounded largely by City parklands consisting of grassy open areas. Although there is a certified master plan for SeaWorld, which is itself a part of the certified Mission Bay Park Master Plan, these documents are land use plans only; no implementation component has been proposed for Mission Bay Park. Thus, the area remains an area of deferred certification, with the Coastal Commission retaining coastal development permit authority. Chapter 3 of the Coastal Act is the legal standard of review and the land use plans are used as guidance.

2. Visual Impacts. Section 30251 of the Coastal Act addresses visual resources, and states, in part:

The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas....

The SeaWorld leasehold is located immediately adjacent to the waters of Mission Bay as well as the City parklands of Mission Bay Park. The proposed ride exhibit will be located entirely within an existing developed area of the SeaWorld park leasehold. The subject site proposed for construction of the 'Manta Ray' ride exhibit is removed from the immediate SeaWorld entrance and parking lot facilities and is surrounded by existing SeaWorld venues, ride attractions, and exhibit areas, including the Commission approved "Atlantis" splashdown ride that consists of three towers with heights of 95 ft., 89ft., and 83ft (Ref. CDP 6-01-129). The proposed ride track system and all associated primary and accessory support structures will not exceed 30 ft. in height and will not be visible from the southern or eastern part of the SeaWorld leasehold. The proposed construction will result in slight modifications to existing public views of the SeaWorld Park from the peak of Ingraham Street Bridge, Ski Beach, and Fiesta Island, but will not obstruct or alter existing public ocean or bay views. In other words, while the proposed ride venue

will not block any views, it will be visible from these offsite public vantages. As such, Special Condition #1 is proposed. This condition calls for the submittal of final plans for the project that document the ride and its associated facilities will be colored with earth tones colors with no white or bright colors to help reduce its visibility from off site public areas. In addition, the applicant is proposing significant landscaping that will help screen the project and help reduce its visibility from offsite locations. Special Condition #2 requires the submittal of final landscape plans with a requirement that the applicant provide a monitoring report in 5 years to assure the landscaping continues to comply with the plans approved with this permit.

In summary, the applicant is proposing to construct the 'Manta Ray' ride and associated support facilities in an appropriate location, consistent with the SeaWorld Master Plan that the Commission voted to certify. The subject site will be removed from public viewing areas, and it will blend in with the existing SeaWorld venues and attractions. As conditioned, the proposed structures and roller coaster ride track systems will not significantly impact or obstruct any existing public ocean or bay views and will be consistent with the height analysis as identified within the SeaWorld Master Plan Update in Figure III-1. All proposed development will be consistent with the character and design of existing exhibits and venues within the SeaWorld leasehold. Therefore, as conditioned, the Commission finds the proposed new attraction will be consistent with Section 30251 of the Act.

3. Public Access/Parking. The following Coastal Act policies are most pertinent to the proposed development, and state, in part:

Section 30211

Development shall not interfere with the public's right of access to the sea where acquired through use or legislative authorization, including, but not limited to, the use of dry sand and rocky coastal beaches to the first line of terrestrial vegetation.

Section 30212

(a) Public access from the nearest public roadway to the shoreline and along the coast shall be provided in new development projects except where:

(1) it is inconsistent with public safety, military security needs, or the protection of fragile coastal resources,

(2) adequate access exists nearby.

Section 30604(c)

(c) Every coastal development permit issued for any development between the nearest public road and the sea or the shoreline of any body of water located within the coastal zone shall include a specific finding that the development is in

conformity with the public access and public recreation policies of Chapter 3 (commencing with Section 30200).

Section 30252

The location and amount of new development should maintain and enhance public access to the coast by...(4) providing adequate parking facilities or providing substitute means of serving the development with public transportation, [and] (5) assuring the potential for public transit for high intensity uses....

SeaWorld is a private commercial leasehold within Mission Bay Park, a public park built primarily on tidelands granted to the City of San Diego. The site is located between the first coastal roadway and the bay. Public visitors to the SeaWorld Park utilize the existing SeaWorld parking facilities, which currently provide 8,400 parking spaces. As a requirement of SeaWorld's Master Plan (EIR) update (approved by the Commission February 7, 2002), SeaWorld is required to conduct an annual Mitigation Monitoring Report Program (MMRP), which includes a traffic analysis of surrounding major intersections and roadways as well as a study of the on-site parking demand for the SeaWorld Park. The most recent traffic analysis and parking study was conducted throughout 2009 and finalized in August of 2010. The report concludes that the existing on site parking supply is adequate to accommodate the current public demand for parking at the SeaWorld Park. The report also found that no additional mitigation measures with regards to parking were triggered by the documented SeaWorld Park attendance levels in 2009. Overall, this report identified a net decrease in the demand for parking within the SeaWorld facilities as well as a reduction in the level of traffic congestion on major accessways to and from the SeaWorld Park.

Additionally, traffic improvements and roadway updates have been completed in anticipation of future attendance climbing to 4 million visitors per year. According to SeaWorld, the number of annual visitors in 2010 was approximately 3.8 million. Numerous Commission sanctioned traffic and parking mitigation projects have been completed by SeaWorld since the certification of the SeaWorld Master Plan Update including the addition of a public pedestrian promenade (Ref. CDP #6-06-022), road improvements along Sea World Drive and the southbound Interstate 5 (I-5) interchange (Ref., CDP #6-08-016), and resurfacing, restriping and landscaping to extend/widen bicycle/pedestrian path(s) across the southern and western edges of SeaWorld's main parking lot (Ref. CDP #6-05-075). These recent improvements as well as the previously established traffic, roadway and parking systems have been designed and constructed to support up to an approximated four million visitors annually. Additionally, the proposed redevelopment of existing facilities within the existing SeaWorld theme park to construct the new roller coaster ride is not expected to generate a significant annual increase in SeaWorld Park attendance levels. Thus, construction of the proposed ride venue will not, in itself, cause the Park to exceed the attendance criteria thresholds for parking or traffic mitigation as identified in the SeaWorld Master Plan Update EIR. Special Condition #4 puts the applicants on notice that when the annual SeaWorld Park attendance levels reach 4 million visitors, that future Tier 2 or Special project development proposals may be

required to complete certain traffic and parking mitigation measures as conditions of approval, in conformance with mitigation criteria established in the SeaWorld Master Plan Update EIR.

The subject site proposed for construction of the new 'Manta Ray Ride' currently supports the 'Forbidden Reef' exhibit as well as various restaurant and visitor serving gift shop structures. The proposed project site is an existing developed area within the interior of the SeaWorld Park that is frequently utilized by visitors, but is comprised of aging structures and facilities that were conceptually approved for redevelopment when the Commission certified the SeaWorld Master Plan Update. It is not expected that the proposed new 'Manta Ray Ride' venue will significantly increase overall annual SeaWorld visitor attendance or public demand for on-site parking at SeaWorld beyond what the existing parking facilities can accommodate.

Public non-vehicular access in the area is comprised of various pedestrian and bicycle paths within the Mission Bay Park area and around the SeaWorld leasehold. Pedestrian and bicycle traffic can cross through the parking areas and rejoin a bayside pathway that extends from either side of the SeaWorld leasehold. Vertical access to the shoreline is available both east and west of the Sea World leasehold. The proposed 'Manta Ray Ride' and all associated structures will not block or modify any existing public-non vehicular routes to or around the SeaWorld leasehold.

As the proposed ride is not expected, in and of itself, to significantly contribute to an overall rise in the level of annual SeaWorld park visitor attendance, none of the identified Sea World Master Plan Update EIR mitigation criteria thresholds will be exceeded as a result of this project. Additionally, the proposed project site is located within the already developed and enclosed portion of SeaWorld. Thus, the proposal will not adversely affect traffic on surrounding streets or necessitate expansion of the existing SeaWorld parking facility. Special Condition #3 requires identification of all construction staging and storage areas, prohibiting the use of public areas for this purpose. If use of public areas or closure of travel lanes cannot be avoided altogether, then work must occur outside the summer season.

In summary, construction of the proposed new "Manta Ray Ride" venue is not expected to necessitate expansion or reconfiguration of the existing traffic systems or parking facilities as the proposed project would not exceed any traffic or parking thresholds as identified in the SeaWorld Master Plan EIR. As such, this project, as proposed and conditioned, will not have adverse impacts on the existing circulation systems and parking facilities of the SeaWorld Park. As such, the Commission finds that construction and operation of the proposed roller coaster type ride will not diminish any existing access opportunities or recreational experiences, and adequate lateral and vertical access is available to serve the demonstrated needs of the public in this area of Mission Bay Park, as specifically required in Section 30604(c) of the Coastal Act.

4. Water Quality. The following Coastal Act policies addressing water quality are most applicable to the subject proposal, and state, in part:

Section 30230

Marine resources shall be maintained, enhanced, and where feasible, restored. Special protection shall be given to areas and species of special biological or economic significance. Uses of the marine environment shall be carried out in a manner that will sustain the biological productivity of coastal waters and that will maintain healthy populations of all species of marine organisms adequate for long-term commercial, recreational, scientific, and educational purposes.

Section 30231

The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum population 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 ...

Over the years, concerns have been raised regarding SeaWorld's land and water operations with respect to maintaining optimum water quality. In particular, the manner in which surface runoff from the parking lots is discharged has been raised as a significant issue. This issue was addressed in detail in review of the master plan, and SeaWorld's grading, drainage, erosion and stormwater requirements were reviewed and found acceptable by the Commission's water quality unit. The proposed project is identified in the master plan, and is designed to be a part of the existing stormwater improvements.

The subject site is located in an area of the SeaWorld leasehold with established storm water and runoff drainage systems and irrigation facilities that are compliant with City and regional irrigation standards. The applicant is proposing to incorporate native and drought tolerant landscaping within the new ride exhibit and show area including designated areas for establishment of a 'palm and cycad canyon' and a 'succulent garden'. All Marine life support system facilities and drainage discharge will be compliant with the discharge standards set by the Regional Water Quality Control Board, as stipulated in the SeaWorld Mater Plan Update.

Moreover, the proposed 'Manta Ray Ride' will not substantially increase impermeable surfaces or significantly change existing patterns of runoff. The subject proposal does not modify any of SeaWorld's existing water treatment, collection or discharge facilities. These facilities currently process runoff from some of SeaWorld's paved parking lots and nearly all of its developed venues; this treatment will continue. Therefore, as conditioned to address other concerns, the Commission finds the proposed development consistent with the cited policies of the Coastal Act.

5. Local Coastal Planning. Section 30604(a) also requires that a coastal development permit shall be issued only if the Commission finds that the permitted development will not prejudice the ability of the local government to prepare a Local Coastal Program (LCP) in conformity with the provisions of Chapter 3 of the Coastal Act. In this case, such a finding can be made.

Mission Bay Park is primarily unzoned. As a whole, Mission Bay Park is a dedicated public park, and SeaWorld is designated as Lease Area in the presently-certified Mission Bay Park Master Plan (land use plan). The proposed development is consistent with the designation in the Mission Bay Park Master Plan, and has been found consistent with all applicable Chapter 3 policies of the Coastal Act. No modifications to SeaWorld's lease with the City of San Diego, or other local discretionary actions, are required as a result of the improvements proposed herein. Therefore, the Commission finds that approval of the project, as conditioned, will not prejudice the ability of the City of San Diego to prepare a fully certifiable LCP for its Mission Bay Park segment.

6. California Environmental Quality Act (CEQA). Section 13096 of the Commission's Code of Regulations requires Commission approval of coastal development permits to be supported by a finding showing the permit 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.

As discussed herein, the proposed project will not cause significant adverse impacts to the environment. Specifically, the project, as conditioned, has been found consistent with the public access and recreation, visual resource, and water quality policies of the Coastal Act. There are no feasible alternatives or mitigation measures available which would substantially lessen any significant adverse impact which the activity might have on the environment and still achieve the purpose of the project. Therefore, the Commission finds that the proposed project is the least environmentally damaging feasible alternative and is consistent with the requirements of the Coastal Act to conform to CEQA.

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 on which the Commission voted on the application. Development

shall be pursued in a diligent manner and completed in a reasonable period of time. Application for extension of the permit must be made prior to the expiration date.

3. 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.



Site location M

- 1 Belmont Park
- 2 Dana Inn Hotel & M
- 3 Hyatt Islandia
- 4 Presido Park
- 5 Princess Resort
- 6 SeaWorld Marina
- 7 South Shores Boat L
- 8 Sports Arena

Figure

MASTER PL



EXHIBIT NO. 1
 APPLICATION NO.
6-10-085
 Location Map

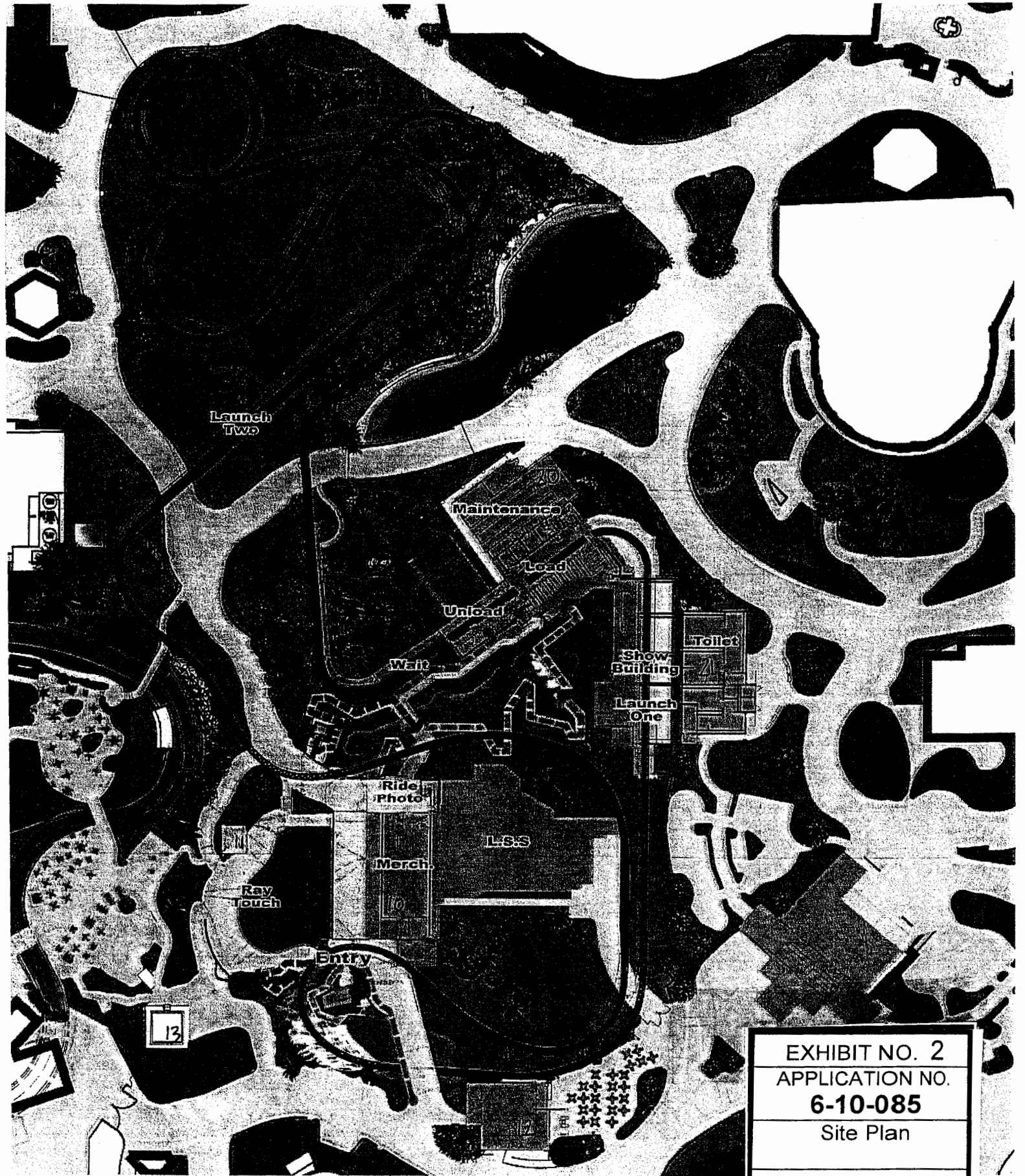


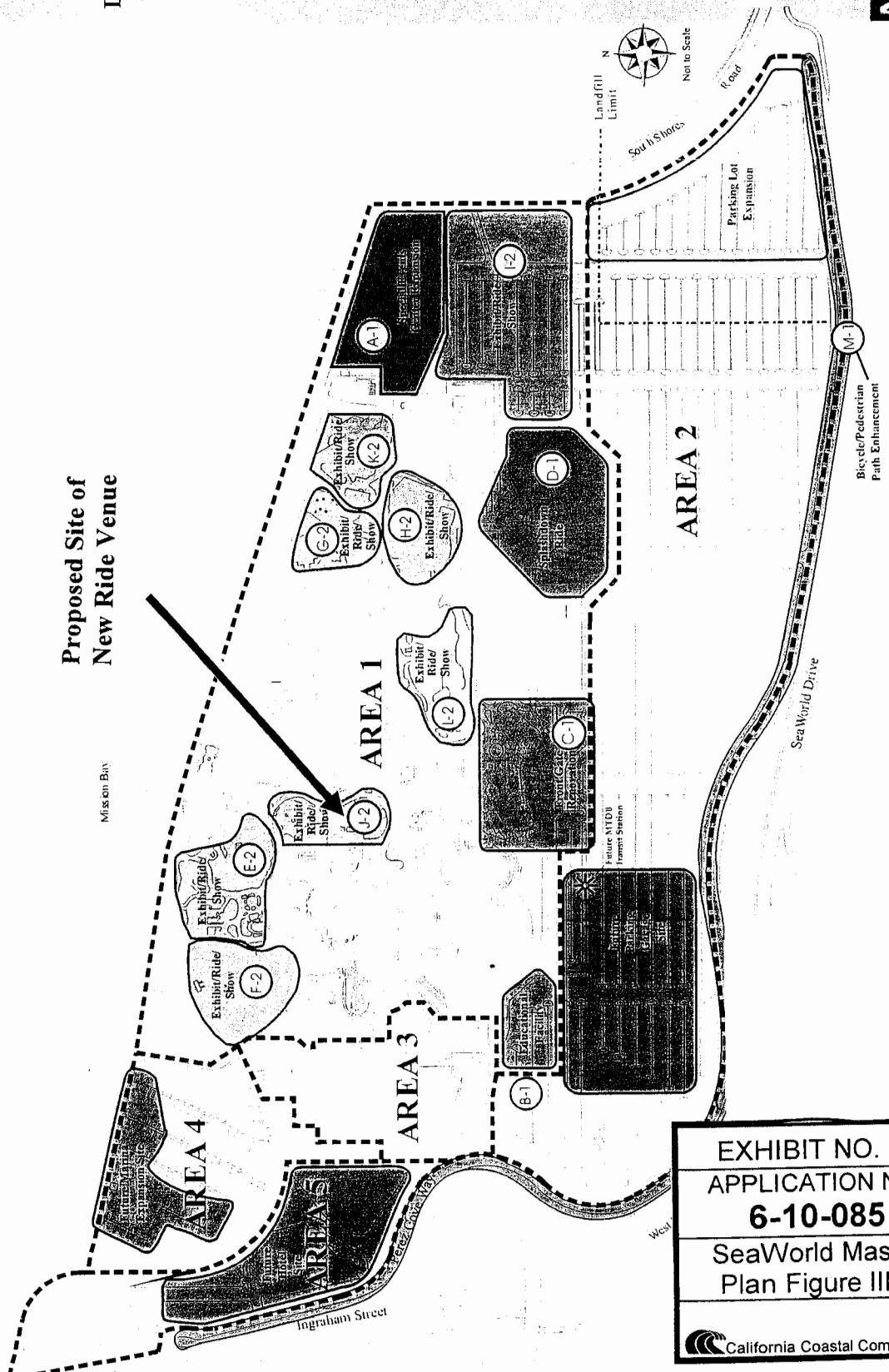
EXHIBIT NO. 2
APPLICATION NO.
6-10-085
Site Plan



Conceptual Development P

- Tier 1 Project
- Tier 2 Project
- Special Projct

Proposed Site of New Ride Venue



Figure

MASTER PLAN III-3

EXHIBIT NO. 3
 APPLICATION NO.
6-10-085
 SeaWorld Master
 Plan Figure III-3

