

**BUSINESS OF THE CITY COUNCIL  
OF THE CITY OF HALF MOON BAY**

**AGENDA REPORT**

**For the meeting of:** May 2, 2000

**TO:** Mayor and City Council

**FROM:** Ken Curtis, Planning Director

**TITLE:** PDP-10-98 – Resolution making findings and denying the appeal and Coastal Development Permit application for the Beachwood Project.

**RECOMMENDATION:**

Staff recommends that the City Council review the resolution and determine if it adequately and completely reflects the conclusions of the Council reached after the close of the public hearing on March 21, 2000. Council should then consider adoption of the resolution to take final action to deny the appeal and coastal development permit application.

**FISCAL IMPACT:**

Identified in staff report for the Council meeting of March 21, 2000.

**BACKGROUND:**

The Council closed the public hearing at the meeting on March 21, 2000 and determined that the appeal and project application must be denied due to inability to make the findings required for approval. Council directed staff to prepare a draft resolution incorporating the findings and decision for final action at the regular Council meeting of April 18, 2000. The matter was continued from April 18 to the meeting of May 2, 2000.

Prepared by:



Ken Curtis  
Planning Director

Approved by:



Blair King  
City Manager

**LIST OF ATTACHMENTS:**

1. Draft Resolution

**Denying Approval of PDP 10-98,  
Coastal Development Permit  
for the Beachwood Subdivision**

The City Council of the City of Half Moon Bay does find and resolve as follows:

**Findings.**

The owners of a 24.7 acre parcel of land generally known as the Beachwood subdivision sought and obtained approval of a vesting tentative map ("VTM" herein) from the City of Half Moon Bay in 1990. That tentative map approved certain conditions which if satisfied would allow for the subdivision of the parcel into 83 buildable lots. At the time that the VTM was approved, it was determined that wetlands covered a portion of the site, and the map was approved so as to prevent development of that area.

Because the area is within the Coastal Zone, and because the subdivision of land qualifies as "development" under the California Coastal Act, before a final map can be issued for the project, a Coastal Development Permit (CDP) must be applied for and issued. In order to approve a CDP for this project, the issuing agency must find that the project is consistent with the requirements of the certified local coastal plan for the area.

At the time the VTM was approved, the City of Half Moon Bay did not have a certified LUP, and thus at that time a CDP for this project could only issue from the California Coastal Commission. However, shortly after the VTM was approved, the City was placed under a sewer hookup moratorium. Because the Coastal Commission would only accept applications for projects which could prove availability of sewer and water, and because this project could not do so until the end of the sewer moratorium, the Coastal Commission refused to file the CDP application submitted to the Commission for this project in 1990.

The sewer moratorium continued until 1998 and no further CDP application was filed with the Coastal Commission. During this time, the City of Half Moon Bay obtained certification of its LCP, and thus the City became the appropriate government agency to which CDP applications would be filed once the sewer moratorium was lifted. An application was submitted to the City by the appellant on August 11, 1998 requesting approval of a Coastal Development Permit in conjunction with the previously approved VTM. The City accepted the application as complete on August 22, 1998. At about the same time that the application was filed with the City, the applicant filed a petition for a writ of mandate in San Mateo Superior Court in which she sought the ministerial approval of a CDP for this project. The applicant argued that because the City has previously undertaken its duties under the Subdivision Map Act and had made certain findings under that Act, the City was precluded from performing its statutory obligations under the separate and distinct California Coastal Act. The applicant further argued that

because, in her opinion, the City's duties under the Coastal Act were ministerial, the City was precluded from undertaking any environmental review for this project under the California Environmental Quality Act, since that Act does not require such review prior to acting on ministerial duties.

The City rejected those arguments, and has argued that the City's duties under the Coastal Act are never ministerial, and must be taken fully consistent with the LCP and only after CEQA based environmental review. The Court has stayed action on this matter pending final City action on this CDP application. Thereafter, in October 1998, the City, in accordance with the California Environmental Quality Act and applicable State Guidelines prepared an Initial Study and a proposed mitigated negative declaration.

After the preparation of the Initial Study, and the proposed Negative Declaration, the City was informed about the potential presence of additional and previously unstudied wetlands on the property, potentially in areas where development was proposed to occur. Based on this information the City undertook preliminary field studies of these potential wetlands, and in a letter sent to the City by Wetlands Regulatory Scientist Terry Huffman, PhD dated March 4, 1999, the City was informed that certain areas of the site

“seasonally pond and saturate the soils sufficiently to satisfy the Corps’ criteria that wetland hydrology and soil conditions are present. In addition, the prevalent vegetation found within the depressional areas satisfies the Corps’ criteria that a prevalence of wetland vegetation occurs. ... It also appears that the depressional areas are potentially subject to regulation under the LCP.”

After the conclusion of a duly noticed public hearing on the matter held on March 11, 1999, at which time all interested persons were given an opportunity to be heard, the Planning Commission considered all written and oral testimony presented for its consideration of the CDP application. Because the City was required by the Permit Streamlining Act time to act on this application, the Planning Commission could not order that action on the application be delayed pending further environmental review. Instead, based primarily on the new information pertaining to the potential greater presence of wetlands on the site than had previously been studied and the need for further study of the area prior to action to approve the CDP, the Planning Commission denied the application.

On March 17, 1999 the applicant appealed the decision of the Planning Commission to the City Council, pursuant to section 18.20.073 (B) of the Zoning Code of the City of Half Moon Bay. On March 29, 1999 the applicant submitted a letter waiving a right to a hearing before the City Council within 30 days of the filing of the appeal. Both the City and the applicant thereupon undertook extensive analysis of the potential presence of wetlands on the site.

The applicant has submitted wetland studies prepared by Wetlands Research Associates (WRA) and Sequoia Associates, prepared specifically by Michael Josselyn (Certified Professional Wetland Scientist #121) of WRA and Stephen Faulkner, PhD of Sequoia Associates, respectively, as well as correspondence from Dana R. Sanders, Sr. PhD.

In addition to the preliminary information prepared by Terry Huffman, PhD, the City has received reports prepared by LSA Associates, Inc., prepared specifically by Wildlife Biologist Steve Foreman and Soil Scientist Sean Lohmann. The information provided by LSA indicates the presence of nine areas of previously unknown wetlands on the site, shown in the areas marked on the map attached as Attachment A hereto, which is incorporated herein by reference. The areas shown as wetlands in Attachment A occur in areas of the project where development is proposed to occur. Because the City's LCP precludes most development within any wetland area or within a 100 foot buffer of that area, the City Council must determine if these areas are in fact wetlands, and if so, if the project can be approved.

The City Council held a duly noticed public hearing on March 21, 2000, at which time all interested persons were given an opportunity to be heard on the matter, and at which the City Council received testimony from the above described Messrs. Josselyn, Faulkner and Foreman as well from the applicant and counsel for the applicant Anne E. Mudge. Prior to the meeting, the City Council received an extensive Agenda Report on the Beachwood Subdivision, and an extensive Biological Report on the Beachwood Subdivision. During the meeting counsel for the applicant provided the City Council with multiple boxes of what she purported to be the record pertaining to this matter over a multi-year period. In addition, information contained in the Agenda Report was augmented with further correspondence from the various experts just prior to the City Council's hearing, including correspondence from the General Counsel of the California Coastal Commission.

The City has in prior proceedings relied upon the wetlands expertise of Messrs. Josselyn, Foreman and Huffman in acting on projects brought before and approved by the City Council. For instance, the City Council has relied upon the expertise of Dr. Josselyn in approving a very large project known as the North Wavecrest Specific Plan; the City has relied upon the expertise of Mr. Foreman in approving a project adjacent to the Beachwood project known as the Pacific Ridge subdivision.

In this matter, the City Council finds that the team of Josselyn and Faulkner disagree with the team of Foreman and Lohmann with regard to the issue of whether the site has seen an increase in the presence of wetlands since the 1990 approval of the VTM. Messrs. Josselyn and Faulkner have provided the City with a considerable amount of analysis which they say indicates that the areas in question do not qualify as hydric soils. This alleged lack of hydric soils, they argue, mandates a finding of no wetlands under a definition of wetland they argue is present in the City of Half Moon Bay certified local coastal program. They do not argue that the areas in question do not meet the

definition of wetland as set forth in section 30121 of the Coastal Act, and in fact Dr. Josselyn's analysis indicates that nine areas in question are heavily populated with hydrophytic vegetation; instead, they argue that the areas in question do not meet an interpretation of the City's LCP argued for by Anne E. Mudge.

Messrs. Foreman and Lohmann have provided the City with extensive analysis and personal observations of the hydrology and vegetation found on the site, and by letter dated February 24, 2000 have provided the City Council with their determination that nine areas of the site not identified in previous studies meet the LCP definition of wetlands.

The City Council considered all written and oral testimony presented for their consideration including the correspondence, analysis and opinions and oral presentations of Messrs. Josselyn, Faulkner Forman and Lohmann. The City Council finds that the opinions of Messrs. Faulkner and Josselyn regarding this issue is based primarily on their erroneous interpretation of the term "wetland" set forth in the City's certified LCP.

In this regard, the City Council finds that the term "wetland" is defined in the Coastal Act at section 30121 of the Public Resources Code as follows:

"'Wetland' means lands within the coastal zone which may be covered periodically or permanently with shallow water and include saltwater marshes, freshwater marshes, open or closed brackish water marshes, swamps, mudflats, and fen."

The term "wetland" is also defined in various places in the City's certified LCP including in the appendix to the Land Use Plan. The definition set forth in Appendix A of the LUP defines wetland as follows:

"Wetland is an area where the water table is at, near, or above the land surface long enough to bring about the formation of hydric soils or to support the growth of plants which normally are found to grow in water or wet ground. Such wetlands can include mudflats (barren of vegetation), marshes, and swamps. Such wetlands can be either fresh or saltwater, along streams (riparian), in tidally influenced areas (near the ocean and usually below extreme high water of spring tides), marginal to lakes, ponds, and man-made impoundments. Wetlands do not include areas which in normal rainfall years are permanently submerged (streams, lakes, ponds, and impoundments) nor marine or estuarine areas below extreme low water of spring tides, nor vernal wet areas where the soils are not hydric."

Messrs. Faulkner and Josselyn focus on the last phrase of the definition set forth above and argue that the phrase "Wetlands do not include ... vernal wet areas where the soils are not hydric" mandates that any portion of the site which is vernal wet but



where the soils are not hydric cannot be considered a wetland regardless of whether the area is significantly covered with hydrophytic vegetation.

The City Council has also received and considered correspondence from Ralph Faust, Chief Counsel of the California Coastal Commission dated March 20, 2000. That letter includes an analysis of the above argument made by Messrs. Josselyn, Faulkner and Ms. Mudge. Mr. Faust notes that the definition above begins with the phrase:

“Wetland is an area where the water table is at, near, or above the land surface long enough to bring about the formation of hydric soils **or** to support the growth of plants which normally are found to grow in water or wet ground.”

Mr. Faust notes that the first sentence of the definition includes within the definition of wetland both wet areas which produce hydric soils and wet areas which produce hydrophytic vegetation, and that the first phrase defining a wetland to include wet areas which produce hydrophytic vegetation separate from those wet areas which only produce hydric soils would have no meaning if the last phrase restricted all wetlands to only those vernal wet areas which produce hydric soils and ignores and excludes those wet areas which produce hydrophytic plants but not hydric soils. That is, the first sentence of the definition is the actual definition, and the remainder of the text is explanatory. As Mr. Faust notes:

“After providing a definition of wetlands consistent with the Coastal Act’s implementing regulations, the City’s certified LCP definition goes on to provide various examples of areas where the water table is near the surface long enough to promote the formation of hydric soils or support the growth of plants which normally are found to grow in water or wet ground.... After providing such examples, the definition of wetlands contained in the City’s certified LCP goes on to identify examples of areas where the water table is not near the surface long enough to promote the formation of hydric soils or support the growth of plants which normally are found to grow in water or wet ground. One such example identified in the last sentence of section 18.30.020(E) is ‘vernally wet areas where the soils are not hydric.’ ... This example of not-wetland areas does not extend to vernal wet areas that contain hydrophytes. Thus these latter vernal wet areas remain within the definition of wetlands. Accordingly, only vernal wet areas with neither hydric soils nor hydrophytes would be excluded from the City’s definition of wetlands.”

Mr. Faust’s letter concludes as follows:

“In conclusion, the most logical interpretation of the above-quoted language contained in the City’s certified LCP, construed in light of the Coastal Act as a whole, requires the City to protect those areas at the Beachwood site where the water table is near the land surface long enough to either support the growth of hydrophytes or to support the formation of hydric soils. As such, only vernal

wet areas with neither hydric soils nor hydrophytes are excluded from the City's definition of wetlands."

The Council notes that the conclusions of Messrs. Josselyn and Faulkner are premised on an interpretation of the City's certified LCP proposed by Ms. Mudge in a letter to Dr. Josselyn dated September 9, 1999. However, it is the City Council's duty to construe its LCP, and it is mandated to do so in a manner which best protects the State's Coastal Resources. The City Council finds that the interpretation of the term wetland proposed by Ms. Mudge does not and would not satisfy the objectives of the City's LCP in that her interpretation would result in significantly reducing the protection of wetlands in Half Moon Bay. In addition, the City Council concurs with Mr. Faust that the final sentence in the City's definition is meant to and only does exclude from the definition of wetland those vernal wet areas with neither hydric soils nor hydrophytic vegetation. Because the City has received wetlands reports from Dr. Josselyn in prior matters, it is aware of his knowledge and expertise in this area of study. The City Council notes however that in prior reports submitted to the City in other matters, specifically with the recently City of Half Moon Bay approved Wavecrest project, Dr. Josselyn made no reference to the exclusionary language above quoted. The City Council notes that Messrs. Josselyn, Faulkner, Forman and Lohmann are all in agreement that the areas at issue are vernal wet, and are populated with hydrophytic vegetation.

The City Council concurs with the opinion of Mr. Faust with regard to the meaning and intent of the definition of wetland set forth in the City's LCP. Although the City Council finds that the definition of wetland in the certified LCP extends the definition to vernal wet areas with either hydric soils or hydrophytic vegetation, even if there is any uncertainty in the LCP definition, the City Council finds that an interpretation which extends the definition of wetland to these areas is required in order for the City's LCP to be found consistent with the goals and policies of the Coastal Act. In acting on any CDP application, the City Council must determine if the project is consistent with the City's Local Coastal Program (HMBMC section 18.20.070.A.). Pursuant to Policy 1-1 of the City's certified LUP, the City has adopted the policies of the Coastal Act (sections 30210 through 30264) as the guiding policies of the LUP. Public Resources Codes section 30233 sets forth the Coastal Act policy governing and restricting the diking, filling and dredging of wetlands. The City's certified LCP notes under the headline of "Definition of Terms Used in Coastal Act Policies" that the wetlands referred to in the policy found at PRC 30233 is as defined in the Act at section 30121. In furtherance of these Coastal Act policies, the certified LCP includes policies 3-1 through 3-5 wherein the LCP provides a Definition of Sensitive Habitats (Policy 3-1), a Designation of Sensitive Habitats (Policy 3-2), adopts a policy for the Protection of Sensitive Habitats (Policy 3-3) and lists Permitted Uses (Policy 3-4) and Permit Conditions (Policy 3-5). These LCP policies are all adopted pursuant to the guiding policy of PRC 30233 which requires the protection of wetlands as that term is defined in the Act. Pursuant to Policy 1-2, where policies within the LUP overlap or conflict, on balance, the policy which is most protective of coastal resources shall take precedence.

As noted above, the City's LCP adopts Coastal Act policies and thus also adopts the broad definition of wetland found at section 30121 of the Coastal Act which is an integral part of the Coastal Act wetlands policies; that definition is the one relied upon by the Coastal Commission in acting on projects within its original jurisdiction, and the definition by which its appellate jurisdiction is determined. Policy 1-4 of the LCP requires that "Prior to the issuance of any development permit required by this Plan, the City shall make the finding that the development meets the standards set forth in all applicable Land Use Plan policies." The City Council finds that a definition of wetland that would result in providing no protection to vernal wet areas with hydrophytic vegetation but lacking hydric soils would fail to meet the standards established by Policies 3-1 through 3-5, and would fail to implement the standard established by Policy 1-2 which requires that the City apply those policies which best protect coastal resources. Even if the definition of wetland set forth in Appendix A of the LUP could be afforded only the interpretation argued for by Ms. Mudge, it would then be in conflict with the Coastal Act definition of wetland set forth in section 3.1 of the LUP. Pursuant to Policy 1-2, the City Council must grant precedence to that definition which is most protective of coastal resources.

The City Council is aware that the City's LCP was certified after the adoption of Coastal Commission "Statewide Interpretive Guidelines for Wetlands and Other Wet Environmentally Sensitive Habitat Areas." Because the Guidelines note that "[t]he guidelines should be viewed as a tool in reviewing coastal permit applications and LCP's for wetlands and adjacent areas..." and because the Guidelines were in effect when the Coastal Commission certified the City's LCP, they serve a useful tool in any interpretation of definitions set forth in the City's LCP. Pursuant to the Guidelines "[t]he Commission generally considers wetlands, estuaries, streams, riparian habitats, lakes and portions of open coastal waters to be environmentally sensitive habitat areas because of the especially valuable role of these habitat areas in maintaining the natural ecological functioning of many coastal habitat areas and because these areas are easily degraded by human developments." Furthermore, "[s]ome wetlands may not be readily identifiable by simple means. In such cases, the Commission also will rely on the presence of hydrophytes and/or the presence of hydric soils as evidence that an area may be periodically or permanently covered with shallow water. These are useful indicators of wetland conditions, but the presence or absence of hydric soils and/or hydrophytes alone are not necessarily determinative when the Commission identifies wetlands under the Coastal Act. In the past, the Commission has considered all relevant information in making such determinations and relied upon the advice and judgement of experts before reaching its own independent conclusion as to whether a particular area will be considered a wetland under the Coastal Act. The Commission intends to continue to follow this policy." The City Council finds that an interpretation of the term wetland set forth in Appendix A of the LCP which would afford no wetland protection to vernal wet areas covered in hydrophytic vegetation solely because those areas might lack hydric soils to be inconsistent with the goals of the above stated guidelines and violative of the Coastal Act and clearly not intended by either the City in adopting the definition or the Coastal Commission in certifying it.



Additionally, zoning ordinance section 18.38.080.A. sets forth the permitted uses within wetlands, and section 18.38.080.B. the uses which may be allowed if a use permit is granted. These sections do not permit either as a matter of right, or with the issuance of a use permit the construction and maintenance of roads to serve a new residential subdivision or the creation of individual lots within a subdivision, and thus the approval of this project would violate these provisions. Additionally, section 18.38.080.C. sets forth explicit standards which must be met in wetlands, section 18.38.080.D defines the extent of wetland buffer zones (100 feet) and section 18.38.080.E. sets forth findings the City Council must make prior to approving development within the requisite buffer zones including a finding that there are special circumstances or conditions affecting the property. Among the standards that must be met is that development be designed and constructed so as to minimize the removal of vegetation.

The City finds that the conclusions of Messrs. Foreman and Lohmann are sound, and bases its decision herein on the information provided to the City by LSA. The City Council finds that there is clear evidence that the nine areas of the site identified by both LSA and WRA as including extensive hydrophytic plant cover are areas where the water table is at, near or above the land surface long enough to bring about the formation of the hydrophytic vegetation found in these areas. As such these areas are wetlands as defined in the City's LCP. The nine areas at issue are found to be wetlands and therefore must be afforded the wetlands protections set forth in the LCP sections referred to above.

As wetlands subject to the provisions of Public Resources Code section 30233, the filling of these wetlands can be permitted only where there is no feasible less environmentally damaging alternative, where feasible mitigation measures have been provided, and then only if the development is of the type described in PRC section 30233 (a) (1) through (a) (8). The approval of the project would result in the filling of wetlands for the development of residential lots, homes and roads to serve those lots and homes. These uses are not among the types of uses permitted by PRC section 30233 (a) (1) through (a) (8) and thus this project cannot be approved. Additionally, even if the proposed filling of the wetlands was of the type set forth in PRC section 30233 (a) (1) through (a) (8), the City Council has been informed that the project as applied for does not propose or agree to undertake feasible mitigation measures nor, as explained below, does the developer agree to construct a feasible, less damaging alternative. The staff report provided to the City Council explains that the wetland areas can be protected with the required 100 foot buffers and still allow for residential development of the site. Although development of the site which provides required wetlands protections and buffer areas would not permit the creation of all of the lots as shown on the VTM, such an approval would allow residential development to occur on the property. The staff proposal is both a feasible mitigation measure and a less damaging alternative. As explained below, the developer has refused during the public hearing to consider or undertake any such alternative, and thus the City Council cannot find that this project would comply with the provisions of PRC section 30233.

As wetlands subject to the protections of HMBMC sections 18.38.080.C, 18.38.080.D and 18.38.080.E, the City Council can approve this project only if the project provides 100 foot buffers around all wetlands on the project site, and in all other respects does not result in filling those wetlands. In fact, the project proposes to fill the nine wetland areas identified by LSA in attachment A, and to provide no buffer around those areas. The City Council can find no special circumstances or conditions affecting the property which would support or justify such filling or the failure to provide the requisite buffers. The City Council finds that approval of this project would be contrary to the explicit standards set forth in section 18.38.080.C. in that the project would not minimize the removal of vegetation and would not result in the maintenance of 100 foot buffer zones around wetlands; the City Council further finds that there are no special circumstances which would permit development within the buffer zones, nor is the approval of this project necessary for the proper design and function of some permitted activity on the property. As such, the project fails to comply with the provisions of HMBMC sections 18.38.080.C, 18.38.080.D and 18.38.080.E.

The protection of these nine areas with the required 100 foot wetland buffers prohibits the development of these portions of the site otherwise slated for development under the VTM. Consistent with the certified LCP, the City cannot approve development in these areas except for the limited types of development permitted for wetlands in the LCP. Those provisions do not allow the construction of streets or home sites, and thus to the extent that this project if approved would result in the construction of streets or home sites in these areas, the project must be modified to protect these areas before it can be approved.

Because the extent of wetlands on the site is greater than was determined at the time the VTM was approved, and because the project proposes development on these wetlands, City staff proposed in their staff report to the City Council that the City Council modify the project to limit development to those areas outside of the 100 foot buffer zones around the nine new wetlands areas and issue a CDP for that modified project. In comments made to the City Council during the public hearing on this matter, and correspondence received just prior, the applicant and his attorney informed the City Council that he would not accept any modification of the original VTM approval, that is, he would not accept any modification of the project which would accommodate and protect the nine new wetlands areas. However, the City Council finds that modifications are required to the development contemplated by the VTM to avoid said wetlands. Although the City Council finds that the project could be modified so as to permit some level of development consistent with the LCP, because the developer has repeatedly stated that he will not accept such modifications, the City Council must take such action within its power to protect the areas in question. Since development is prohibited on and within 100 feet of the nine areas identified as wetlands shown in Attachment A, and since the applicant will not agree to undertake any Council imposed protections, the City Council is unable to find that the project proposes a development which is consistent with the City's LCP policies which prohibit development in or near wetland areas.

Before acting on this application, the City Council has reviewed the mitigated negative declaration prepared for this application dated October 5, 1998. Although CEQA does not apply to project denials, the City Council finds that because this proposed mitigated negative declaration did not consider the nine additional areas affected by wetlands, even if the City Council had been able to make findings under the LCP to approve the project, the Council would be unable to find under CEQA Guidelines section 15074 on the basis of the whole record before it (including the initial study and any comments received), that there is no substantial evidence that the project will not have a significant effect on the environment and that the negative declaration or mitigated negative declaration reflects the lead agency's independent judgment and analysis. Additionally, the Council finds under CEQA Guidelines section 15162 that although a negative declaration was adopted by the City in 1990 at the time of the approval of the VTM, on the basis of substantial evidence in the light of the whole record new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the negative declaration was adopted, shows that the project will have one or more significant effects not discussed in the initial study and previously adopted negative declaration and that therefore before project approval can be gained, an EIR analyzing the impacts of this project on the newly discovered wetlands located on the site must be undertaken unless the project is modified to mitigate all potential impacts to the wetlands in which case a mitigated negative declaration could be considered.

**Section 2: Decision.** Because the City Council cannot make the finding that the development, as proposed or as modified conforms to the Local Coastal Program, the appeal filed in this matter, and Coastal Development Permit application PDP 10-98 are hereby denied.

**PASSED AND ADOPTED** by the Half Moon Bay City Council at a meeting held on May 2, 2000, by the following vote:

AYES: \_\_\_\_\_

NOES: \_\_\_\_\_

ABSENT: \_\_\_\_\_

ABSTAIN: \_\_\_\_\_

APPROVED:

\_\_\_\_\_  
Dennis Coleman, Mayor

ATTEST:

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Dorothy R. Robbins, City Clerk

Attachment: Attachment A: LSA Map" Beachwood Subdivision, Location of Ponding Areas and Other Areas of Potentially Subject to LCP Jurisdiction

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