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## COASTAL PERMIT ADMINISTRATOR STAFF REPORT FOR CDP MODIFICATION

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APRIL 15, 2024  
CDPM\_2023-0004

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### SUMMARY

**OWNER/APPLICANT:** Karen and Lee Trepte  
1710 Center Road  
Novato, CA 94947

**AGENT:** Douglas L. Losak  
445 N. State Street  
Ukiah, CA 95482

**REQUEST:** After-the-fact Administrative Coastal Development Permit Modification of CDP\_2004-0049 to convert a 1,940 square-foot quilting barn into a single-family residence, convert a 1,131 square-foot farm labor housing unit into an accessory dwelling unit, and install a new septic system.

**LOCATION:** In the Coastal Zone, 5.5± miles northeast of the Fort Bragg town center, 0.75± mile northeast of the intersection of State Route 1 (SR 1) and the Little Valley Road (CR 426), at 26585 N. Highway 1, Fort Bragg, APN: 069-060-26.

**TOTAL ACREAGE:** 11.5± Acres

**GENERAL PLAN:** Rural Residential – 10 Acre Minimum (RR10)

**ZONING:** Rural Residential – 10 Acre Minimum (RR:10)

**SUPERVISORIAL DISTRICT:** 4 (Gjerde)

**ENVIRONMENTAL DETERMINATION:** Categorically Exempt

**RECOMMENDATION:** Approve with Conditions

**STAFF PLANNER:** Shelby Miller

### BACKGROUND

**PROJECT DESCRIPTION:** After-the-fact Coastal Development Administrative Permit Modification of CDP\_2004-0049, which authorized the construction of a 5,000± square-foot single-family residence with a 1,170 square foot garage, a 640 square-foot guest cottage, a tennis court with a storage building, two (2) 1,440 square-foot greenhouses, construction of a 960 square-foot addition to an existing quilting barn, and construction of a 560 square-foot addition to a tractor barn. In addition, CDP\_2004-0049 authorized the conversion of an existing residence to a farm produce and equipment storage facility upon completion of new residence, the installation of LPG or fuel oil tanks, installation of a new septic system and well, the addition of water tanks, the construction of pump houses, the installation of exterior light fixtures, and to repair and construct a new driveway and turnarounds, the installation of deer fencing with gates around parcel perimeter, and to repair existing septic system.

The original coastal development permit (CDP\_2004-0049) was approved with conditions on November 9, 2005. The CDP\_2004-0049 permit was vested following the issuance of a Septic Repair Permit that included an additional septic tank installation for the barn bathroom (CE\_2004-0024, Septic No. ST 23861).

The after-the-fact Modifications of CDP\_2004-0049 consists of converting the 1,940 square-foot quilting barn into a single-family residence and converting a 1,131 square-foot farm housing unit into an accessory dwelling unit and installing a septic system (ST27851) that would serve the proposed single-family residence.

**RELATED APPLICATIONS:**

- FB98-900191: 200 AMP Overhead Service to residence, **Finaled.**
- BF\_2004-0335: 980 SF Workshop. **Expired.**
- BF\_2004-0336: 990 SF Garage. **Expired.**
- CDP\_2004-0049: Construct a SFR, Tennis Court, Farm Equipment, Guest Cottage, Septic, and Well, **Approved with Conditions.**
- BF\_2004-0440: Addition to Farm Labor Housing, **Finaled.**
- ST23860 Septic System For 4 Bedrooms. **Approved.**
- ST27851 Septic System Permit. **On Hold.**
- CE\_2004-0024: Replacement Well, **Finaled.**
- CE\_2004-0035: Repair Farm Housing Septic System (ST23861). **Finaled.**
- BF\_2021-0578: Legalize Existing Addition. **Expired.**

**SITE CHARACTERISTICS:** The 11.5± acre subject parcel is located 5.5± miles northeast of the Fort Bragg City center, 0.75± mile east of the intersection of Highway 1 and the Little Valley Road (CR 426), at 26585 N. Highway 1, APN: 069-060-26. This property is mapped as Moderate Fire Hazard within the Fort Bragg Rural Fire Protection District and the California Department of Forestry and Fire Protection (CalFire) District<sup>1</sup>. The parcel can be accessed from private driveway easement via State Route 1 (SR 1). The property is currently developed with one (1) septic system (ST 23861), one (1) well (WW16720F), one (1) 1,940 single-family residence, one (1) 1,131 square-foot accessory dwelling unit (ADU), one (1) 320 square-foot barn, and one (1) 140 square-foot shed. The original CDP included a septic system (ST23860) which was not installed and is superseded. The proposed septic system (ST27851) to serve the single-family residence is currently on hold with the Division of Environmental Health pending the approval of this CDP modification.

The parcel is mapped as High Productivity Timberland land capabilities and Marine Terrace Deposits (Zone 2) – Strong Shaking natural hazards<sup>2</sup>. The property is within a Sufficient Coastal Ground Water Resources area<sup>3</sup>. Soils present on the parcel are Sirdrak Loamy Sand, 0 to 14 percent slopes, and is suitable for planting trees such as Monterey Cypress, Monterey Pine, and Bishop Pines<sup>4</sup>.

**SURROUNDING LAND USE AND ZONING:** As listed on Table 1 below, the property is surrounded by Rural Residential, Forest Land, Remote Residential, and Timberland Production zoning.

Table 1: Surrounding Land Use and Zoning				
	GENERAL PLAN	ZONING	LOT SIZES	USES
NORTH	Rural Residential (RR10)	Rural Residential (RR:10)	10± Acres	Residential
EAST	Forest Land (RL160)	Timberland Production (TP:160)	80± Acres	Residential
SOUTH	Rural Residential (RR2), Remote Residential (RMR20)	Rural Residential (RR:2), Remote Residential (RMR:20)	1± to 62±Acres	Residential
WEST	Rural Residential (RR2)	Rural Residential (RR:2)	6±, 1± Acres	Residential

**PUBLIC SERVICES:**

Access: Private Driveway easement via SR 1  
Fire District: Fort Bragg Rural Fire Protection District & CalFire  
Water District: None  
Sewer District: None  
School District: Fort Bragg Unified

**AGENCY COMMENTS:** Project referrals were sent to the following responsible or trustee agencies with jurisdiction over the Project (See Table 2). Their required or related permits, if any, are listed below.

<sup>1</sup> Fire Hazard Zones Map.

<sup>2</sup> LCP Land Capabilities and Natural Hazards Map.

<sup>3</sup> Coastal Ground Water Resources Map.

<sup>4</sup> Soil Survey of Mendocino County, California, Western Part.

Table 2: Referral Agency Responses	
REFERRAL AGENCIES	COMMENT
Environmental Health	Comments
Air Quality Management District	No Response
Building Inspection – FB	No Comment
Planning Division – FB	Comments
Assessor	No Response
Archaeological Commission	Comments
CALTRANS	No Response
CalFire	Comments
Department of Transportation (DOT)	No Comment
Fort Bragg Rural Fire Protection District	No Comment
Sonoma State University	Comments
CA Department of Fish and Wildlife	No Comment
Fort Bragg City Planning Department	No Comment
California Coastal Commission	No Response
Cloverdale Rancheria	No Response
Redwood Valley Rancheria	No Response
Sherwood Valley Band of Pomo Indians	No Response

On March 13, 2024, the California Department of Fish and Wildlife (CDFW) stated, “considering that the property’s development is outside of 100-foot buffers for any Environmentally Sensitive Habitat Areas and that the proposed activities do not include ground disturbance or impacts to surrounding vegetation, CDFW does not have any comments or recommendations at this time”.

### **LOCAL COASTAL PROGRAM CONSISTENCY**

The proposed development is consistent with the goals and policies of the Local Coastal Program (LCP), General Plan, and Zoning Code as detailed below:

Land Use: The project site is located within the boundaries of the LCP area, as shown on LCP Land Use Map 11: Little Valley<sup>5</sup>. The subject parcel is classified as Rural Residential in the Mendocino Coastal Element Chapter 2.2<sup>6</sup> which is intended,

“...to encourage local small scale food production (farming) in areas which are not well suited for large scale commercial agriculture, defined by present or potential use, location, mini-climate, slope, exposure, etc. The Rural Residential classification is not intended to be a growth area and residences should be located as to create minimal impact on agricultural viability.”

The after-the-fact project involving the conversion of a 1,940 square-foot quilting barn into a single-family residence and a 1,131 square-foot farm housing unit into an accessory dwelling unit, would not impact the agricultural viability of the RR land use classification. The project, as proposed, is consistent with the principal permitted uses associated with residential development per Mendocino County Coastal Element Chapter 2.2.

Zoning: This project site is located in the Rural Residential zoning district<sup>7</sup>. Mendocino County Code (MCC) Section 20.380.005: Rural Residential zoning is intended,

“...to encourage and preserve local small-scale farming in the Coastal Zone on lands which are not well-suited for large scale commercial agriculture. Residential uses should be located as to create minimal impact on the agricultural viability.”

In addition, Section 20.456.015 prescribes the following regulations for accessory uses:

<sup>5</sup> LCP Land Use Map.

<sup>6</sup> General Plan Classifications Map.

<sup>7</sup> Zoning Map.

“Subject to the restrictions and limitations of this Chapter, including the granting of a Coastal Development Permit, where applicable, the following accessory buildings and uses shall be permitted in all zoning districts which allow a single-family residence:

(G) Accessory Living Unit. Not more than one (1) guest cottage or detached bedroom may be permitted on each legal parcel. An Accessory Dwelling Unit (ADU) may also be permitted, subject to limitations established in Chapter 20.458. Pursuant to MCC Section 20.458.020 General Standards for Accessory Dwelling Units: an ADU shall only be permitted on a parcel that contains an existing or proposed single-family dwelling.

The proposed development would not contribute a significant impact on the agricultural viability of the RR District. As proposed, the project would permit an after-the-fact conversion of a single-family residence, septic system, and an ADU in a manner consistent with the principal permitted residential uses and accessory residential uses in the RR Zoning District.

The proposed development conforms to the maximum lot coverage and all front, rear, and side yard minimum distances. See Table 3.

Table 3: MCC Chapter 20.376 Rural Residential Development Standards (RR:10)		
SECTION	STANDARD	PROPOSED
20.376.030 Minimum Front & Rear Yards	50 feet	Greater than 50 feet
20.376.035 Minimum Side Yards	50 feet	Greater than 50 feet
20.376.045 Building Height Limit	28 feet	22 feet
20.376.065 Maximum Lot Coverage	10 percent	Less than 10 percent

Grading, Erosion, and Runoff: The purpose of MCC Chapter 20.492 Grading, Erosion, and Runoff is:

“The approving authority shall review all permit applications for coastal developments to determine the extent of project related impacts due to grading, erosion and runoff. The approving authority shall determine the extent to which the following standards should apply to specific projects, and the extent to which additional studies and/or mitigation are required, specifically development projects within Development Limitations Combining Districts.”

The project site is relatively flat with a slope of 15 degrees to 32 degrees. The after-the-fact project includes the conversion of a quilting barn into a single-family residence and a farm housing unit into an ADU. The original footprint of the structures was not altered during the conversions and no grading was performed. In addition, the proposed project includes installing a septic system to serve the single-family residence. The Division of Environmental Health (DEH) require applicants to install septic systems during dry weather only, specifically no earlier than May 1 and no later than November 1. Condition #12 has been included to ensure compliance with the DEH Construction Requirements. With added conditions, the proposed project complies with MCC Chapter 20.492 Grading, Erosion, and Runoff.

Habitats and Natural Resources: The LCP Habitats & Resources Map identifies several habitats on the project site including Coastal Prairie Grasslands, Hardwood Forest/ Grassland, and Coastal Forest<sup>8</sup>. The subject parcel also contains Riparian Wooded Habitats to the eastern undeveloped portion of the property. A botanical survey was conducted for CDP\_2004-0049 by Susan Morrison in 2004. Site visits were conducted on May 24, June 18, and July 8, 2004. Two Environmentally Sensitive Habitat Areas (ESHAs) were discovered including a wetland in the northeastern portion of the property and a population of swamp harebell along the northern edge of the wetland. In summary, the report states that no development was proposed within 100 feet of any ESHA.

On October 30, 2023, the proposed project was referred to the California Department of Fish and Wildlife (CDFW) and the California Coastal Commission (CCC). As of April 1, 2024, the CCC has not responded. On March 13, 2024, CDFW provided informal comments listed above.

<sup>8</sup> LCP Habitats & Resources Map.

Considering the proposed project does not include any grading and minimal construction, additional biological reports were not requested. As proposed, Staff finds the project consistent with the development criteria of MCC Chapter 20.496 Environmentally Sensitive Habitat and Other Resource Areas and with the Local Coastal Program policies related to Chapter 3.1.

Archaeological/Cultural Resources: The proposed project was referred to the Northwestern Information Center (NWIC) and the Mendocino County Archaeological (ARCH) Commission on October 30, 2023. NWIC responded indicated that a previous study (Study #28988) was conducted by Van Buren in 2004, and one or more cultural resources was identified on subject parcel. The project and the NWIC response were scheduled for review by ARCH on December 13, 2023. The Arch Commissioners requested the applicant submit a copy of Study #28988 and continued the project to a later date. On February 14, 2024, the ARCH Commissioners accepted the Study and found that no cultural, historical, or archaeological sites were observed on project site and recommended the Discovery Clause as a condition of approval. The project was also referred to three local tribes for review and comment, including Cloverdale Rancheria, Redwood Valley Rancheria, and Sherwood Valley Rancheria. No response was received from the tribes.

Hazards Management: The proposed project will have minimal to no impact on geologic, fire, and flood hazards. The site is mapped as Moderate Fire Hazard and is serviced by the Fort Bragg Rural Protection Fire District and CalFire<sup>9</sup>. The proposed project was referred to the Fort Bragg Rural Fire Protection District and CalFire on October 30, 2023. The Fort Bragg Rural Fire Protection District responded with “no comment” and CalFire responded stating that if the applicant proposes to conduct timber operations in the future, a CalFire permit is required. The proposed project would not conflict with Coastal Element 3.4, and complies with MCC Chapter 20.500 Hazard Areas, including geologic, faults, bluffs, tsunamis, landslides, erosion fire, and flood hazards.

Visual Resources: The purpose of MCC Chapter 20.504 is to,

“...insure that 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 landforms, to be visually compatible with the character of surrounding areas and, where feasible, to restore and enhance visual quality in visually degraded areas.”

The subject parcel is not located in a mapped Highly Scenic Area. The parcel is east of State Route 1 (SR1). The project would be uniform to the natural setting and would not affect public views or be out of character with surrounding structures. There is no exterior lighting proposed at this time, the proposed project would be consistent with the intent of Visual Resources and Special Treatment Areas. Conditions of approval have been implemented to require exterior lighting to be kept to the minimum necessary for safety and security purposes and to be downcast and shielded and positioned in a manner that will not shine light or allow light glare to extend beyond the boundaries of the parcel in compliance with MCC Section 20.504.035.

Transportation and Circulation: The project would contribute minimally to new sources of traffic on local and regional roadways. The project was referred to Mendocino County Department of Transportation (DOT) and California Department of Transportation (Caltrans) for input. DOT responded with “no comment” and no response has been received from Caltrans. The proposed project complies with MCC Section 20.516.015(C)(2) Transportation Systems.

Groundwater Resources: The project site is designated as having “Sufficient” water resources by the Mendocino County Coastal Groundwater Study<sup>10</sup>. The project was referred to the Mendocino County Division of Environmental Health (DEH) – Fort Bragg for input on water and septic developments. DEH declared that the subject parcel has one well and one septic (Permit No. ST 23861) that holds capacity for a one-bedroom residence. An additional Septic Permit application (ST27851), which would hold capacity for three bedrooms, is currently on hold pending approval of this CDP Modification. DEH stated that the three-bedroom septic system design has been approved but the system has not been installed. In addition, the DEH determined the well would adequately serve the single-family residence and the ADU.

**ENVIRONMENTAL DETERMINATION:** The Secretary for Resources has found that certain classes or projects have been determined not to have a significant effect on the environment and are therefore exempt from the requirement for the preparation of environmental documents. The project meets the criteria to be

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<sup>9</sup> Fire Hazard Zones Map.

<sup>10</sup> Coastal Groundwater Resources Map.

Categorically Exempt from the California Environmental Quality Act, per CEQA Guidelines Section 15303, Class 3, which consists of construction and location of limited numbers of new, small facilities or structures; installation of small new equipment and facilities in small structures; and the conversion of existing small structures from one use to another where only minor modifications are made in the exterior of the structure.

Pursuant to Title 14, Division 6, Chapter 3, Article 19, Section 15303, the project, as proposed, to convert two existing structures into a single-family residence and an ADU would only require minor modifications on the interior and exterior of the structure. In addition, installing a septic system to serve the proposed single-family residence would include minimal ground disturbance. Staff finds that the project would not have a significant impact on the environment and is declared to be categorically exempt from further environmental review within the meaning of CEQA.

### **PROJECT FINDINGS AND CONDITIONS**

Pursuant to the provisions of Chapter 20.532 of the Mendocino County Code, the Coastal Permit Administrator approves the proposed project and adopts the following findings and conditions:

#### **FINDINGS:**

1. Pursuant with MCC Section 20.532.095(A)(1), the proposed project to convert a quilting barn into a single-family residence, convert a farm labor housing unit into an ADU, and install a new septic system is in conformity with the certified Local Coastal Program. The proposed project allows for continued residential use of the site, which is consistent with the intent of the Rural Residential Classification; and
2. Pursuant with MCC Section 20.532.095(A)(2), the project will be provided with adequate utilities, access roads, drainage, and other necessary facilities. The on-site well (WW16720F) would serve the property. The existing septic system serves the proposed ADU. The new septic system has been approved by the Division of Environmental Health and would serve the proposed single-family residence. The subject parcel is developed and is accessible by a private driveway via SR1; and
3. Pursuant with MCC Section 20.532.095(A)(3), the proposed project to convert two existing buildings into one single-family residence and one accessory dwelling unit aligns with the principally permitted uses for the Rural Residential District as well as the accessory uses which are necessarily and customarily associated with, and are appropriate, incidental, and subordinate to, such principal permitted uses. The proposed project would not create an impact on the agricultural viability of this District. The project is consistent with the purpose and the intent of the Rural Residential District, as well as all other provisions of Division II of Title 20 of the Mendocino County Code; and
4. Pursuant with MCC Section 20.532.095(A)(4), the proposed project to convert a quilting barn into a single-family residence, convert a farm labor housing unit into an accessory dwelling unit and installing a septic system would not have any significant adverse impacts on the environment. The quilting barn and farm labor housing unit are existing buildings, and grading or construction is not proposed to complete this project. In addition, installing a septic system would not have any significant adverse impacts on the environment within the meaning of the California Environmental Quality Act and is determined to be Categorically Exempt from further environmental review. The Secretary for Resources has found that certain classes or projects have been determined not to have a significant effect on the environment and are therefore exempt from the requirement for the preparation of environmental documents. The project meets the criteria to be Categorically Exempt from the California Environmental Quality Act, per CEQA Guidelines Section 15303(a) and Section 15303(d); and
5. Pursuant with MCC Section 20.532.095(A)(5), the project will not have any adverse impact on any known archaeological or paleontological resources. An Archaeological Report for the subject parcel, dated in 2004, by Thad Van Buren in support of CDP\_2004-0049. Considering the proposed project is located within the study area of the 2004 Archaeological Report, it was resubmitted for review. On October 30, 2023, local tribes were contacted to review the project. No response was submitted. On September 6, 2023, the Archaeological Commission accepted the 2004 Report and found that no cultural, historical, or archaeological sites were observed in the project area and to include the Discovery Clause in the conditions of approval.

As proposed, the project would be consistent with the archaeological resource policies of Coastal Element Chapter 3.5 and MCC Chapter 22.12. MCC Chapter 22.12 sets standard requirements and processes that apply in the event of archaeological discoveries during ground disturbance, and should any archaeological sites or artifacts be discovered further protection measures may be imposed as per Condition 7; and

6. Pursuant with MCC Section 20.532.095(A)(6), other public services, including but not limited to, solid waste and public roadway capacity have been considered and are adequate to serve the proposed development.

The project was referred to various agencies providing public services. On October 30, 2023, the project was referred to the Mendocino County Department of Transportation and Caltrans. As of April 1, 2024, the project has not received comments.

The project includes installing a new septic system that would serve the single-family residence. On April 2, 2024, the Division of Environmental Health confirmed that the septic design to support the single-family residence had been approved and will be issued pending the approval of the CDP modification. The septic system (ST23861) currently serves the proposed ADU. Water will be supplied by an on-site well.

**CONDITIONS OF APPROVAL:**

1. This action shall become final and effective on the 11th day following the decision unless an appeal is filed pursuant to Section 20.544.015 of the Mendocino County Code. The permit shall expire and become null and void at the expiration of two years after the effective date except where construction and use of the property in reliance on such permit has been initiated prior to its expiration.
2. To remain valid, progress towards completion of the project must be continuous. The Applicants have sole responsibility for renewing this application before the expiration date. The County will not provide a notice prior to the expiration date.
3. The application, along with supplemental exhibits and related material, shall be considered elements of this permit, and that compliance therewith is mandatory, unless an amendment has been approved by the Coastal Permit Administrator.
4. This permit shall be subject to the securing of all necessary permits for the proposed construction and grading from County, State, and Federal agencies having jurisdiction. Any associated building permits that are expired shall be remediated to the satisfaction of the Department of Planning and Building Services during this process.
5. This permit shall be subject to revocation or modification upon a finding of any one or more of the following:
  - a. The permit was obtained or extended by fraud.
  - b. One or more of the conditions upon which the permit was granted have been violated.
  - c. The use for which the permit was granted is conducted so as to be detrimental to the public health, welfare or safety, or to be a nuisance.
  - d. A final judgment of a court of competent jurisdiction has declared one or more conditions to be void or ineffective or has enjoined or otherwise prohibited the enforcement or operation of one or more such conditions.
6. This permit is issued without a legal determination having been made upon the number, size, or shape of parcels encompassed within the permit-described boundaries. Should, at any time, a legal determination be made that the number, size, or shape of parcels within the permit-described boundaries are different than that which is legally required by this permit, this permit shall become null and void.

7. If any archaeological sites or artifacts are discovered during site excavation or construction activities, the property owner shall cease and desist from all further excavation and disturbances within 100 feet of the discovery and make notification of the discovery to the Director of the Department of Planning and Building Services. The Director will coordinate further actions for the protection of the archaeological resources in accordance with Section 22.12.090 of the Mendocino County Code.
8. Any building permit request shall include all conditions of approval of this Coastal Development Permit. Conditions shall be printed on or attached to the plans submitted.
9. Prior to a final for any building permit(s) associated with the Accessory Dwelling Unit, the applicant shall execute and record a deed restriction which shall run with the land, and be binding upon any future owners, heirs, or assigns. The deed restriction will include the following conditions:
  - a. No dwelling on the property (Accessory Dwelling Unit or primary residence) shall be used for transient habitation.
  - b. The Accessory Dwelling Unit shall not be sold or otherwise conveyed separate from the primary residence except when the primary dwelling and the Accessory Dwelling Unit are built by a qualified non-profit corporation and the Accessory Dwelling Unit will provide low-income housing in accordance with California Government Code Section 65852.26.
10. Prior to issuance of a Building Permit, exterior lighting details shall be printed on the plans submitted. All exterior lighting fixtures shall be kept to the minimum necessary for safety and security purposes, be downcast and shielded, and positioned in a manner that will not shine light or allow light glare to extend beyond the boundaries of the parcel in compliance with MCC Section 20.504.035.
11. The applicant(s) shall secure all required permits for the proposed project as required by the Division of Environmental Health.
12. Construction of the septic system shall be during dry weather only. The rainy season shall be avoided. Work may be performed no earlier than May 1 and no later in the year than November 1 without prior written approval from the Environmental Health Division. Extra work may have to be performed in order to construct in moist soil conditions.

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DATE

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SHELBY MILLER  
PLANNER I

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DATE

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JULIA KROG  
COASTAL PERMIT ADMINISTRATOR

Appeal Period: 10 Days  
Appeal Fee: \$2,674.00

**ATTACHMENTS:**

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| A. Location Map                            | K. Post LCP Certification & Appeal Jurisdiction |
| B. Aerial Map Imagery                      | L. Adjacent Parcels                             |
| C. Aerial Map Imagery (Detail)             | M. Fire Hazard Zones & Responsibility Areas     |
| D. Topographical Map                       | N. Wildland-Urban Interface                     |
| E. Site Plan                               | O. Special Flood Hazard Areas                   |
| F. Zoning Display Map                      | P. Wetlands                                     |
| G. General Plan Classifications            | Q. Ground Water Resources                       |
| H. LCP Land Use Map 11: Little Valley      | R. Estimated Slope                              |
| I. LCP Land Capabilities & Natural Hazards | S. Western Soil Classes                         |
| J. LCP Habitats & Resources                | T. Farmland Classifications                     |