

VANNUCCI MOMSEN MORROW

Attorneys at Law
An Association of Sole Practitioners

Philip M. Vannucci
Brian S. Momsen
The Hofman Building
308 S School St.
Ukiah, CA 95482
Phone: 707.462.0900
Email: pvannucci@vmm-law.com
Email: bmomsen@vmm-law.com

Colin W. Morrow
The Penny Farthing Building
45060 Ukiah St., Ste. A
P.O. Box 1214
Mendocino, CA 95460
Phone: 707.380.1070
Email: cmorrow@vmm-law.com

April 10, 2025

VIA EMAIL ONLY

California Coastal Commission
North Coast Office
1385 8th Street #130
Arcata, CA 95521
(NorthCoast@coastal.ca.gov)

Re: Appeal of City of Fort Bragg City Council's Approval of CDP 8-24
Concerning Development at 1151 South Main Street in Fort Bragg,
California

Honorable Commissioners of the Coastal Commission:

I represent Paul Clark, who appeals the Fort Bragg City Council's approval of a wall of residential apartments upon the water. Such a barrier of bedrooms is fundamentally incompatible with the City of Fort Bragg's local coastal plan and the public access provisions of the Coastal Act.

PC -1

The project under appeal is an 87 unit residential development situated west of Highway 1 and comprising 84,387 square feet. The City Council found the project to be located "between the first public road and the sea." (Permit Finding, (3)(g).) The real property was zoned in conformity with the City of Fort Bragg's General Plan to only have "[r]esidential uses . . . above the ground floor or on the ground floor at the rear of buildings, (General Plan, Part 2(G)¹), but this requirement was ignored. Space that should have been reserved for visitor serving and recreational commercial facilities is being closed off for private residential use.

PC-2

Although the City of Fort Bragg's review of the proposed project was rife with error, the current appeal focuses primarily upon (i) the project improperly sacrificing real

PC-3

¹ The City's General Plan is available at <https://www.city.fortbragg.com/departments/community-development/general-plan-zoning-information/local-coastal-program>, and those parts made part of the certified local are identified in Part 1(C)(2)(a).)

property intended for commercial visitor serving facilities to private non-visitor serving residential development in a manner contrary to Fort Bragg's local coastal plan and general plan; (ii) similarly being inconsistent with the policy objectives of the Coastal Act by prioritizing private residential development over visitor serving or recreational opportunities, and (iii) failing to evaluate or consider major traffic impacts that are likely to be inconsistent with both the local coastal plan and policy objectives of the Coastal Act.

The Council's approval of the project is appealable under Public Resources Code section 30603, subdivisions (a)(1 & 4).

In an appeal to the state Coastal Commission from a grant of a coastal development permit, if the Commission determines that the appeal presents a substantial issue, the permit application is reviewed de novo; in effect, the Commission hears the application as if no local governmental unit was previously involved, deciding for itself whether the proposed project satisfies legal standards and requirements. (*McAllister v. California Coastal Com.* (2008) 169 Cal.App.4th 912.) "The Commission has the ultimate authority to ensure that coastal development conforms to the policies embodied in the state's Coastal Act. In fact, a fundamental purpose of the Coastal Act is to ensure that state policies prevail over the concerns of local government." (*Charles A. Pratt Construction Co., Inc. v. California Coastal Com.* (2008) 162 Cal.App.4th 1068, 1075.)

PC-4

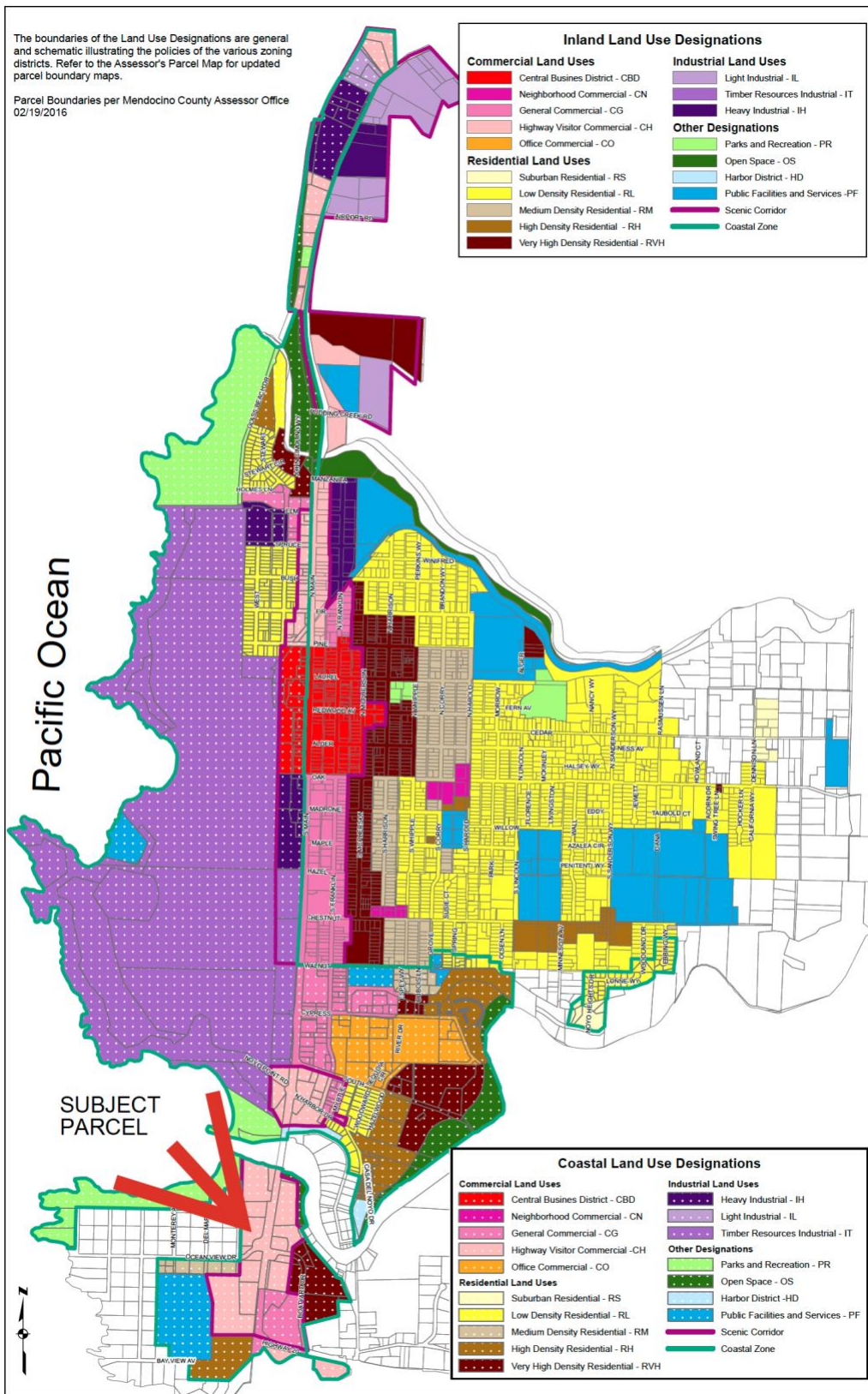
I. Background

The proposed project is an 87 unit residential village located at 1151 South Main Street. The subject parcel is a 2.6 acre parcel zoned as "Highway Visitor Commercial." The subject parcel is located on the west side of Highway 1, lying between Highway 1 and the Pacific Ocean. It is also located in a central arterial in-route to Fort Bragg, directly where visitors from either San Francisco (traveling north via Highways 101 or 1) or the Central/Sacramento Valley (traveling west via Highway 20) would enter Fort Bragg.

PC-5

The subject site's location and relevant zoning is provided on the zoning map appearing on the following page. As this map emphasizes, (i) the subject location is a central arterial point of ingress and egress for the City, (ii) the City's zoning has consciously elected to designate this site for visitor serving commercial facilities, and (iii) private residential development is generally favored both inland and toward the town's interior.

PC-6



The subject area currently provides ocean views—and visual notice of coastal access and opportunities at the nearby Pomo Bluffs and Todd’s Point public parks—as PC-7 depicted below:



By contrast, the artist’s rendering of the development highlights that the development would be replaced with a total barrier, operating both visually and psychologically, to dampen public access:

PC-8



II. The City Council Was Advised As to a Legally Defective Standard That Caused It to Fail to Engage in a Proper Local Coastal Plan Consistency Analysis; Moreover, the Council Failed to Make Adequate Findings of Fact Linked to Evidence in the Administrative Record

At the subject hearing, the City’s planner repeatedly misadvised the Council as to relevant standards of review. In discussing Government Code section 65589.5—California’s Housing Accountability Act—the planner misadvised the Council that it

could only deny the project either if there was a specific adverse impact upon health and safety or that there was no feasible method to satisfactorily mitigate or avoid the adverse impact. (Hearing Video, available at <https://www.city.fortbragg.com/government/city-council/council-meeting-live-stream>, at 1:15.) This was reiterated—incorrectly—by this planner.

This was a misstatement of the law. Moreover, it caused the Council to completely—and myopically—overlook local coastal plan consistency. What Government Code section 65589.5 says is that:

PC-9

For a housing development project for very low, low-, or moderate-income households, or an emergency shelter, a local agency shall not disapprove the housing development project or emergency shelter, or condition approval in a manner that renders the housing development project or emergency shelter infeasible, including through the use of design review standards, unless it makes written findings, based upon a preponderance of the evidence in the record, as to one of the following: [With the statute then going on to list a number of criteria.].

PC-9

(Gov. Code, § 65589.5, subd. (d).)

What the planner failed to understand or articulate to the Council, was that the Project failed to meet the criteria for a “a housing development project for very low, low-, or moderate-income households” as that phrase appears above. Only 8 of the 87 housing units will be low-income. (Notice of Final Action, Special Condition 6.)

Under the relevant definitions, at least ten percent of the units must be dedicated to “very low income households.” “‘Housing for very low, low-, or moderate-income households’ means housing for lower income households, mixed-income households, or moderate-income households.” (Gov. Code, § 65589.5, subd. (h)(3)(A).) A project that is “[h]ousing for mixed-income households” relying upon “very low income households” must have “at least 10 percent of the total units, . . . dedicated to very low income households.” (*Id.* at subd. (h)(3)(C)(i) (emphasis added).)

PC-9

Ergo, it was structural error for the Council to ignore the substantial considerations described in this appeal in approving the project. Even if the precise contours of this statutory reality were not expressly raised below, the functional thrust of the issue was raised because the City Council’s constituents repeatedly implored the Council to undertake the specific kinds of review that the planner advised the Council that Government Code section 65589.5 forbade.

PC-9

Even if this had not been structural error, the Housing Accountability Act:

[S]hall not be construed to prohibit a local agency from requiring a housing development project to comply with objective, quantifiable, written

PC-9

development standards, conditions, and policies appropriate to, and consistent with, meeting the jurisdiction's share of the regional housing need pursuant to Section 65584. However, the local agency shall apply those standards, conditions, and policies to facilitate and accommodate development at the density permitted on the site and proposed by the development.

(Gov. Code § 65589.5, subd. (f).)

Additionally clouding the issues otherwise discussed herein, it was error for the City to adopt its findings in only the most conclusory manner. Because the Council was functioning in a quasi-judicial (rather than legislative) manner, its decisions must be supported by factual findings with a legal nexus to an ultimate decision. (Code Civ. Proc. § 1094.5.) “[T]he agency which renders the challenged decision must set forth findings to bridge the analytic gap between the raw evidence and ultimate decision or order.” (*Topanga Assn. for a Scenic Community v. County of Los Angeles* (1974) 11 Cal.3d 506, 515.) The findings must be sufficient “both to enable the parties to determine whether and on what basis they should seek review and, in the event of review, to apprise a reviewing court of the basis for the [administrative] action.” (*Id.* at p. 514.) Here, however, this did not happen. This is reflected in the wholly conclusory nature of the Council’s findings of fact.²

PC-10

III. The Project Improperly Sacrifices Land Intended for Commercial Visitor Serving Facilities to Private Non-visitor Serving Residential Development in a Manner Contrary to Fort Bragg’s Local Coastal Plan

“The mission of [Fort Bragg’s] Coastal General Plan is to preserve and enhance the small town character and natural beauty that make the City a place where people want to live and visit, and to improve the economic diversity of the City to ensure that it has a strong and resilient economy which supports its residents.” (General Plan, Part 1(D).) This project does the opposite of that. It creates a homogenous monolith of apartments that undermine the small-town character of Fort Bragg, perpetuates the City’s drift toward a bedroom community, and physically obstructs highway visitors’ views of both the coastline and coastal access.

PC-11

² The project was also improperly exempted from any CEQA review under CEQA Guideline section 15352 and 15192. The project is not consistent with the applicable general plan and zoning as required by CEQA Guideline 15352. Only some, and not all the units will be affordable, as required by CEQA Guideline 15192. For the reasons stated herein, there is a fair argument that such a large project will have relevant impacts upon the physical environment. Moreover, the fact that the project relied upon density bonuses that had been previously approved without notice to local landowners presents a due process issue under *Scott v. City of Indian Wells* (1972) 6 Cal.3d 541 and *Horn v. County of Ventura* (1979) 24 Cal.3d 605.

PC-11

The mission and vision of Fort Bragg is of “[a] city which seeks to preserve its natural beauty and provide access to the scenic and recreational resources of its natural setting.” (*Ibid.*) Nevertheless, the project obstructs natural beauty as mentioned above. The mission and vision of Fort Bragg is as “[a] city that embraces its role as the primary commercial and service center on the Mendocino coast.” (*Ibid.*) Nevertheless, this project sacrifices real property that was expressly allocated for visitor serving commercial facilities to insular bedroom units. The mission and vision of Fort Bragg is “[a] city which promotes itself as a tourist destination and which provides the necessary infrastructure and services to support a growing population of transient visitors.” (*Ibid.*) Nevertheless, this project rebuffs transient visitors in favor of cloistered bedrooms.

PC-12

“Highway Visitor Commercial”—as the subject property is zoned—is specifically designated by Fort Bragg’s Coastal General Plan as follows:

This land use designation applies to land uses serving residents and visitors on sites which are located along Highway One and arterials at the entry points to the community. Typical uses allowed in this designation include motels and other lodging enterprises, restaurants, and retail outlets. Residential uses are permitted above the ground floor or on the ground floor at the rear of buildings³³ at a maximum density of up to 24 units per acre with a conditional use permit.

PC-13

(General Plan, Part 2(G); see also Fort Bragg Municipal Code 17.22.030, subd. (C)(5)(a) [“Secondary uses oriented to local clientele may be permitted *where the primary use of a site is oriented to or serves visitor, regional, or transient traffic*,” (emphasis added)].)

PC-13

Paired with this, it is a goal of the local coastal plan to “[m]aximize public recreational opportunities in the Coastal Zone consistent with sound resource conservation principles and the constitutionally protected rights of property owners.” (General Plan, Goal LU-5.0) Local Coastal Plan policies include that the City of Fort Bragg should “[c]ontinue to provide for and encourage additional visitor-serving commercial facilities,” (General Plan, Policy LU-5.1,) and “[e]nsure that there are adequate sites for visitor-serving land uses by: a) Maintaining existing areas designated for Highway-Visitor Commercial uses; b) Maintaining the Highway Visitor Commercial land use designation as one allowing primarily recreational and visitor-serving uses; and

PC-13

³³ The choice to use—and approval of—ground floor spaces as residential facilities is a fundamental defect in the project. Moreover, the use of the ground floor for commercial use would not make the project unfeasible because the City’s planner explained at hearing that the applicant had initially been “perfectly happy” with a 56 residential unit project. (Hearing Video, available at <https://www.city.fortbragg.com/government/city-council/council-meeting-live-stream>.) The applicant could still have 56 units with the ground floors committed to visitor serving commercial uses.

c) Reserving adequate infrastructure capacity to accommodate existing, authorized, and probable visitor serving uses,” (General Plan, Policy LU-5.2)

It is additionally an express policy of the local coastal plan to:

Ensure Adequate Service Capacity for Priority Uses.

a. New development that increases demand for new services by more than one equivalent dwelling unit (EDU) shall only be permitted in the Coastal Zone if,

PC-14

- Adequate services do or will exist to serve the proposed development upon completion of the proposed development, and
- Adequate services capacity would be retained to accommodate existing, authorized, and probable priority uses upon completion. Such priority uses include, but are not limited to, coastal dependent industrial (including commercial fishing facilities), visitor serving, and recreational uses in commercial, industrial, parks and recreation, and public facilities districts. Probable priority uses are those that do not require an LCP amendment or zoning variance in the Coastal Zone.

b. Prior to approval of a coastal development permit, the Planning Commission or City Council shall make the finding that these criteria have been met. Such findings shall be based on evidence that adequate service capacity remains to accommodate the existing, authorized, and probable priority uses identified above.

(General Plan, Policy PF-1.3.)

Said elsewhere, it is a policy of the local coastal plan to “[e]ncourage the development of residential uses *in conjunction with commercial enterprises in commercial zones*, where the viability of the commercial activities and visitor-serving uses would not be adversely affected.” (General Plan, Policy H-2.2 (emphasis added).)

PC-15

Here, however, the City failed to consider the effect of a residential monolith upon the ability to provide for new priority visitor serving facilities. The City is instead wholly sacrificing the potential for visitor serving or recreational facilities in favor of a wall of bedrooms between Highway 1 and coastal access. The Council appears to have failed to grapple with its local coastal plan primarily because it was told that it could not. Had it done so, the Council would have seen the objectively clear patent inconsistency.

PC-15

IV. Similarly, the Preference for Private Non-visitor Serving Residential Development Is Contrary to the Coastal Act

The policies of the Coastal Act prioritize that “maximum access, . . . and recreational opportunities shall be provided for all the people consistent with public safety needs” (Pub. Res. Code § 30210.) “Development shall not interfere with the public’s right of access to the sea” (*Id.* at § 30211.) “Lower cost visitor and

PC-16

recreational facilities shall be protected, encouraged, and, where feasible, provided. Developments providing public recreational opportunities are preferred.” (*Id.* at § 30213.) “Oceanfront land suitable for recreational use shall be protected for recreational use and development unless present and foreseeable future demand for public or commercial recreational activities that could be accommodated on the property is already adequately provided for in the area.” (*Id.* at § 30221.) “The use of private lands suitable for visitor-serving commercial recreational facilities designed to enhance public opportunities for coastal recreation shall have priority over private residential, general industrial, or general commercial development, but not over agriculture or coastal-dependent industry.” (*Id.* at § 30222.)

PC-16

These policies embrace—and specifically articulate—the paramount value of coastal access and visitor serving facilities. “[A] core principle of the Act is to maximize public access to and along the coast as well as recreational opportunities in the coastal zone.” (*San Diego Unified Port Dist. v. California Coastal Com.* (2018) 27 Cal.App.5th 1111, 1129.)

PC-17

Even though the City did rely upon California’s Density Bonus Law, the Density Bonus Law “does not supersede or in any way alter or lessen the effect or application of the California Coastal Act of 1976.” (Gov. Code § 65915.)

PC-18

Here, however, for the reasons stated above, this project will defeat these aims. It will hijack a substantial 2.6 acre tract of land that is paramountly situated to serve—and designated by prior conscious zoning for—visitor serving commercial facilities. Having a three story wall of private bedrooms also creates a visual barrier to coastal access contrary to Public Resources Code section 30251. Although the area is not labeled as a highly scenic viewshed, the ocean is clearly visible from Highway 1 through the lot, and this view (and notice to the public) of coastal access would be destroyed.⁴ This reality is made clear by the photograph of the current view provided above and the juxtaposed artist’s rendering provided by the applicant.

V. The City Failed to Consider or Evaluate Major Traffic Considerations in a Manner Inconsistent with the Local Coastal Plan and Coastal Act

The project is situated upon an arterial roadway that brings Fort Bragg the majority of its visitors.

Fort Bragg is built along Highway One which is also called Main Street within the City. Highway One is the only continuous north-south road serving the north coast of Mendocino County, providing a local

⁴ The three story height of the project—which would be superlatively above grade in the area—was a repeated point of concern in both written comments and public opposition at hearing.

transportation corridor for many communities and the primary access route for visitors. Traffic volumes on this roadway have increased steadily over the years.

(General Plan, 5-C.)

The primary intersection in the area of the project is Ocean View Drive and Highway 1. The City of Fort Bragg's own analysis has concluded that even prior to this project, the level of service at this intersection was in decline. (General Plan, Table C-3.) PC-20

Numerous local coastal plan policies focus on the importance of traffic considerations. It is a policy to "[e]nsure that the amount and phasing of development can be adequately served by transportation facilities." (General Plan, Policy C-21.) To service this policy, the City Council is to "[r]eview development proposals for their direct and cumulative effects on roadway Level of Service standards. During the development review process, City staff will determine whether traffic studies need to be carried out and the scope of such studies. (General Plan, Program C-1.2.1.) The City is to "provide consistent standards for the City's street system." (General Plan, Policy C-2.4.) PC-20

The local coastal plan is clear that "[t]raffic studies shall be required for all major development proposals, including but not limited to, drive-through facilities, fast food outlets, convenience markets, major tourist accommodations, shopping centers, commercial development, residential subdivisions, and other generators of high traffic volumes that would affect a Level of Service. Traffic studies shall identify, at a minimum: (a) the amount of traffic to be added to the street system by the proposed development; (b) other known and foreseeable projects and their effects on the street system; (c) the direct, indirect, and cumulative adverse impacts of project traffic on street system operations, safety, and public access to the coast; (d) mitigation measures necessary to provide for project traffic while maintaining City Level of Service standards; (e) the responsibility of the developer to provide improvements; and (f) the timing of all improvements." (General Plan, Policy C-2.6.) PC-20

These requirements are further in accord with—and parallel—the policy objectives of the Coastal Act.

Numerous written comments and speakers addressed a myriad of traffic issues. These concerns, however, were ignored. The City Council did nothing to address these concerns, nor did it make proper findings of fact in relation to traffic. Traffic is an important policy consideration here for multiple reasons. Among these is that the significant traffic of 87 units will create a barrier to recreational users and visitors accessing the coast at Todd's Point and Pomo Bluffs. The only meaningful—and certainly only signalized—route from Highway 1 to coastal uses at Todd's Point and Pomo Bluffs is the intersection of Highway 1 and Ocean View Drive. The Council never PC-20

meaningfully considered these traffic considerations. The traffic serving this 87 unit development being compressed through a single intersection will undoubtedly create a barrier to visitor and recreational access.

Moreover, the City's dismissal of traffic concerns was consistently defective. The City suggested that no traffic study was warranted solely because Caltrans determined no traffic study was warranted under their rubric. (Staff Report, p. 36.) Caltrans, however, is not charged with policing either local coastal plan consistency or the objectives of the Coastal Act. To the extent the City relied on any traffic study, the City merely looked at a years old study for a 7,500 square foot AutoZone commercial building. That, however, was a fundamentally different project both in the size, number of users served, and times of uses that would be relevant to a commercial/retail versus residential project. Additionally, the city's failure to study cumulative and access related impacts particularly implicates Coastal Act sections 30210, 30211, and 30252.

PC-20

With the City Council having failed to fundamentally review any traffic concerns, a major project is set to have major impacts upon both the physical environment of Fort Bragg—and recreational and visitor access—without any meaningful review.

PC-20

VI. Conclusion

For the foregoing reasons, appellant Paul Clark respectfully prays that the Coastal Commission vacate the decision of the Fort Bragg City Council and enter a new and different decision denying the subject Coastal Development Permit.

PC-21

Respectfully submitted,



Colin W. Morrow

CALIFORNIA COASTAL COMMISSION

NORTH COAST DISTRICT OFFICE
1385 EIGHTH STREET, SUITE 130
ARCATA, CA 95521
(707) 826-8980
NORTHCOAST@COASTAL.CA.GOV

**APPEAL FORM****Appeal of Local Government Coastal Development Permit****Filing Information (STAFF ONLY)**

District Office: North Coast

Appeal Number: _____

Date Filed: _____

Appellant Name(s): _____

APPELLANTS

IMPORTANT. Before you complete and submit this appeal form to appeal a coastal development permit (CDP) decision of a local government with a certified local coastal program (LCP) to the California Coastal Commission, please review the appeal information sheet. The appeal information sheet describes who is eligible to appeal what types of local government CDP decisions, the proper grounds for appeal, and the procedures for submitting such appeals to the Commission. Appellants are responsible for submitting appeals that conform to the Commission law, including regulations. Appeals that do not conform may not be accepted. Appeals must be received no later than 5 pm on the last day of the appeal period. If you have any questions about any aspect of the appeal process, please contact staff in the Commission district office with jurisdiction over the area in question (see the Commission's contact page at <https://coastal.ca.gov/contact/#/>).

Note regarding emailed appeals. Please note that emailed appeals are accepted **ONLY** at the general email address for the Coastal Commission district office with jurisdiction over the local government in question. For the North Coast district office, the email address is NorthCoast@coastal.ca.gov. An appeal emailed to some other email address, including a different district's general email address or a staff email address, will be rejected. It is the appellant's responsibility to use the correct email address, and appellants are encouraged to contact Commission staff with any questions. For more information, see the Commission's contact page at <https://coastal.ca.gov/contact/#/>.

Appeal of local CDP decision

Page 2

1. Appellant Information

Name: Judy Mashhour-Azad
Mailing address: 5080 Westbury Circle Granite Bay, CA 95746
Phone number: 916-995-9971
Email address: jmashhour@me.com

How did you participate in the local CDP application and decision-making process?

☐ Did not participate ☒ Submitted comment ☒ Testified at hearing ☐ Other

Describe: Attended, submitted opposition at both
Planning Commission and City Council
Meeting

If you did *not* participate in the local CDP application and decision-making process, please identify why you should be allowed to appeal anyway (e.g., if you did not participate because you were not properly noticed).

Describe: _____

Please identify how you exhausted all LCP CDP appeal processes or otherwise identify why you should be allowed to appeal (e.g., if the local government did not follow proper CDP notice and hearing procedures, or it charges a fee for local appellate CDP processes).

Describe: Do not feel facts were all presented in
order to push this proposal through.
Traffic study not made for this project.

JMA-1

If there are multiple appellants, each appellant must provide their own contact and participation information. Please attach additional sheets as necessary.

Appeal of local CDP decision

Page 3

2. Local CDP decision being appealed²

Local government name:

Fort Bragg City Council

Local government approval body:

Planning Commission Fort Bragg

Local government CDP application number:

CDP 8-24

Local government CDP decision:



CDP approval



CDP denial³

Date of local government CDP decision:

March 24, 2025

Please identify the location and description of the development that was approved or denied by the local government.

Describe:

1151 Harbor Avenue

1151 Frontage Road

2.6 acres zoned Highway/Visitor Commercial

First planned for 53 apartment units and

now has 67 units. First started out at

28' now 38' height

Property does have somewhat ocean view and is

at the gateway to Fort Bragg

JMA-2

² Attach additional sheets as necessary to fully describe the local government CDP decision, including a description of the development that was the subject of the CDP application and decision.

³ Very few local CDP denials are appealable, and those that are also require submittal of an appeal fee. Please see the appeal information sheet for more information.

Appeal of local CDP decision

Page 4

3. Applicant information

Applicant name(s):

Kosh Grewal

Applicant Address:

4. Grounds for this appeal

For appeals of a CDP approval, grounds for appeal are limited to allegations that the approved development does not conform to the LCP or to Coastal Act public access provisions. For appeals of a CDP denial, grounds for appeal are limited to allegations that the development conforms to the LCP and to Coastal Act public access provisions. Please clearly identify the ways in which the development meets or doesn't meet, as applicable, the LCP and Coastal Act provisions, with citations to specific provisions as much as possible. Appellants are encouraged to be concise, and to arrange their appeals by topic area and by individual policies.

- Describe: - CC 30251: Scenic visual qualities of coastal JMA-3
areas, to minimize the alteration of natural land JMA-4
forms, to be visually compatible with character of JMA-5
surrounding areas
- cc 30253 - Protect special communities and
neighborhoods that, because of their unique JMA-6
characteristics, are popular visitor destination
points for recreational uses.
- Complex appearance, will distract from economic JMA-7
vitality of established apartments consistent with
small town, rural characteristics of Fort Bragg.
- Zoned Highway / Visitor Commercial - would be required JMA-8

Page 4 Continued

to have at least one commercial business per planned building.

- Greenhouse Gas Emissions created with 400 plus vehicles on daily business. These from daily trips by residents with approximately 170 to 200 vehicles JMA-9
- Possible contamination of our ground wells at Todd's Point from oil and other contaminants from apartments leaking into our soil and effecting our aquifers, thus contaminating our existing wells in all of Todd's Point JMA-10
- No ADA access from apartment complex to Pomo Bluffs Trail and Park other than down one small main road or the dirt road to the trails. Please note the one main road is already heavily traveled daily. JMA-11
- CalTrans pointed out very limited access under American Disabilities Act to Coastal Trail. JMA-11

Appeal of local CDP decision

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5. Identification of interested persons

On a separate page, please provide the names and contact information (i.e., mailing and email addresses) of all persons whom you know to be interested in the local CDP decision and/or the approved or denied development (e.g., other persons who participated in the local CDP application and decision making process, etc.), and check this box to acknowledge that you have done so.

☐ Interested persons identified and provided on a separate attached sheet

6. Appellant certifications

I attest that to the best of my knowledge, all information and facts in this appeal are correct and complete.

Print name Judy Mashhour-Azad

Signature Judy Mashhour-Azad

Date of Signature April 5, 2025

7. Representative authorizations

While not required, you may identify others to represent you in the appeal process. If you do, they must have the power to bind you in all matters concerning the appeal. To do so, please complete the representative authorization form below and check this box to acknowledge that you have done so.

☐ I have authorized a representative, and I have provided authorization for them on the representative authorization form attached.

§ If there are multiple appellants, each appellant must provide their own certification. Please attach additional sheets as necessary.

§ If there are multiple appellants, each appellant must provide their own representative authorization form to identify others who represent them. Please attach additional sheets as necessary.

CALIFORNIA COASTAL COMMISSION

455 MARKET STREET, SUITE 300
SAN FRANCISCO, CA 94105-2219
VOICE (415) 904-5200
FAX (415) 904-5400

**DISCLOSURE OF REPRESENTATIVES**

If you intend to have anyone communicate on your behalf to the California Coastal Commission, individual Commissioners, and/or Commission staff regarding your coastal development permit (CDP) application (including if your project has been appealed to the Commission from a local government decision) or your appeal, then you are required to identify the name and contact information for all such persons prior to any such communication occurring (see Public Resources Code, Section 30319). The law provides that failure to comply with this disclosure requirement prior to the time that a communication occurs is a misdemeanor that is punishable by a fine or imprisonment and may lead to denial of an application or rejection of an appeal.

To meet this important disclosure requirement, please list below all representatives who will communicate on your behalf or on the behalf of your business and submit the list to the appropriate Commission office. This list could include a wide variety of people such as attorneys, architects, biologists, engineers, etc. If you identify more than one such representative, please identify a lead representative for ease of coordination and communication. You must submit an updated list anytime your list of representatives changes. You must submit the disclosure list before any communication by your representative to the Commission or staff occurs.

Your Name _____

CDP Application or Appeal Number _____

Lead Representative

Name _____

Title _____

Street Address. _____

City _____

State, Zip _____

Email Address _____

Daytime Phone _____

Your Signature _____

Date of Signature _____

Additional Representatives (as necessary)

Name _____
Title _____
Street Address. _____
City _____
State, Zip _____
Email Address _____
Daytime Phone _____

Name _____
Title _____
Street Address. _____
City _____
State, Zip _____
Email Address _____
Daytime Phone _____

Name _____
Title _____
Street Address. _____
City _____
State, Zip _____
Email Address _____
Daytime Phone _____

Name _____
Title _____
Street Address. _____
City _____
State, Zip _____
Email Address _____
Daytime Phone _____

Your Signature _____

Date of Signature _____