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Teresa Beddoe, Project Coordinator
Raymond Hall, Coastal Permit Administrator
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790 South Franklin Street
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Robert Merrill, District Manager
North Coast District Office
California Coastal Commission
710 E Street, Suite 200
Eureka, CA 95501

Subject: Deny CDP #55-2006
Deny Special Condition No. 1 to CDP #1-83-270-A1

Ref: Drouillard letter dated October 19, 2007
Draft staff report released October 22, 2007

November 12, 2007

Dear Ms. Beddoe, Mr., Hall and Mr. Merrill,

As an owner of property within the coastal zone near Gualala, and avid user of the Gualala Bluff Trail, the Gualala River and the Gualala Point Regional Park, I ask that you consider my comments regarding the staff report on the application for CDP #55-2006.

BACKGROUND

My main objections to the wall are related to its location west of the current bluff edge and the need for a wall the full length of parcels AP Nos. 145-261-05 and 145-261-13.

The Engineers

Rau and Associates are highly qualified engineers that used sound engineering principals to develop a design that meets the needs of their client. Unfortunately, the resulting design cannot be reconciled with either the Local Coastal Plan (LCP) or the California Coastal Act.

The Project

The project extends across two adjacent parcels, namely the Surf Center parcel and the old pharmacy parcel (AP Nos. 145-261-05 and 145-261-05, respectively). The need for and purpose of the wall differ at each parcel.

The Proposed Wall Location

Most of the adverse impacts of this project are directly attributable to the proposed wall location. Locating the wall west of the current bluff edge creates several conditions that are incompatible with both the Local Coastal Plan (LCP) and the California Coastal Act.

As currently proposed the development will significantly degrade or eliminate the existing Gualala Bluff Trail and eliminate a substantial portion of the natural bluff environment along the Gualala River.

Purpose and Need for Wall at Surf Super Parcel

Special Condition No. 1 of CDP 1-83-270-A1 requires the applicant to build and maintain a wood retaining wall to protect the easement for the Gualala Bluff Trail and the existing development (Surf Super). The applicant seeks an amendment that will allow the construction of a concrete block wall west of the previously established bluff edge.

As described in my October 19, 2007 letter, constructing a timber crib wall aligned with the previous bluff edge is feasible at the location of the large debris slide behind Surf Super. The "Caltrans Timber Crib Wall Type D" can retain heights up to 22 feet with a 12-foot deep footprint. (See attached Caltrans standard plan sheets.) A timber crib wall will protect the existing development, restore the bluff trail and conform to Special Condition No. 1 without any amendments.

Since the applicant can conform to Special Condition No. 1 as currently written, the requested amendment should be denied.

Project Opportunities on the Old Pharmacy Parcel

The project on the old pharmacy parcel that is the subject of CDP #55-2006 presents a unique opportunity to meet both the letter and spirit of the Mendocino County Coastal Zoning Code (MCCZC).

Section 20.488.005 of the MCCZC, which covers the purpose and applicability of general review criteria, states:

(A) The purpose of the coastal development special review criteria is to insure that proposed development will protect, maintain and where feasible enhance and restore the overall quality of the coastal zone environment and its natural and artificial resources.

(B) The approving authority shall apply the general review standards of this Chapter to all Coastal Development Permit applications. (Ord. No. 3785 (part), adopted 1991)

The applicant can protect existing coastal-dependent development and enhance the natural environment of the Gualala Bluff Trail by locating any necessary fill-stabilization solutions east of the existing bluff trail.

In so doing, the need for any retaining structure or hazard removal (fill removal) is largely diminished or eliminated entirely. This will also enable the project to better conform to the general review standards of Section 20.488.100, which state:

(A) Development shall not significantly degrade, or destroy the habitat for, endangered plant and animal species, including native mammals and resident and migratory birds. Diversity, both functionally and numerically, shall be maintained.

(B) The productivity of wetlands, estuaries, tidal zones and streams shall be protected, preserved, and, where feasible, restored.

(C) Approved grading activities shall be conducted in a manner that will assure that environmentally sensitive habitat areas will

be protected from adverse impacts that can result from mechanical damage and undesirable changes in the water table, subsurface aeration and impacts to the root system of riparian vegetation, the alteration of surface or subsurface drainage, or other environmental conditions.

(D) Wetland buffer areas (the transition areas between wetland and upland habitats) shall be protected, preserved, and, where feasible, restored. (Ord. No. 3785 (part), adopted 1991)

The proposed project should be denied because it fails to meet county general review criteria.

Project Adverse Visual Impacts

The visual impact of the proposed retaining wall is significant. Not only will it eliminate a substantial portion of unique bluff environment associated the Gualala River estuary, it will ruin Gualala's appearance as a town on a bluff above the river. (See attached sketch.)

The proposed project should be denied because it is incompatible with other bluff properties along the Gualala River estuary.

Grading Standards

The proposed project fails to comply with two key provisions of the grading standards in Section 20.492.010 of the MCCZC, namely:

(B) Development shall be planned to fit the topography, soils, geology, hydrology, and other conditions existing on the site so that grading is kept to an absolute minimum.

(C) Essential grading shall complement the natural land forms. At the intersection of a manufactured cut or fill slope and a natural slope, a gradual transition or rounding of contours shall be provided.

Staff incorrectly states "[t]he purpose of the project is to stabilize the slope." Actually, the purpose of the project is to stabilize fill that was placed without a permit.

Staff considered only the proposed wall and a no-build option. As a result, feasible alternatives such as removing the fill or stabilizing the fill east of the bluff trail only were not considered.

Alternatives such as those would protect uses that are truly coastal-dependent and enable the project to conform to county grading standards. Both would serve to increase the buffer between future development and the existing bluff environment, and both would comply with the letter and intent of Section 20.488 as well.

The proposed project should be denied because it is incompatible with key provisions of county grading standards.

Change in Topography

The staff report states the proposed project "would not result in significant changes to existing topography or ground surface relief

features." I couldn't disagree more with that characterization of the proposed wall and grading scheme.

By any measure, the proposed topographic changes to this unique bluff top environment are significant.

At 285 feet in length by 17.5 feet average in height, the affected area is significant. The change in slope of the "bluff" will be significant as well. The terrain will change from a slope of roughly 2.5:1 (40% grade) to 1:3 (300% grade). The angle break associated with the bluff will change from a downward deflection angle of roughly 22 degrees to one of roughly 72 degrees.

Staff considered only the proposed wall and the no-build option. As a result, feasible alternatives such as removing the fill or stabilizing the fill east of the bluff trail only were not considered.

Implementing either of those alternatives would allow the applicant to protect truly coastal dependent development and maintain the current bluff landform.

The proposed project should be denied because it results in significant changes to the existing topography of a unique bluff top environment.

CONCLUSIONS

The project presents a unique opportunity to meet both the letter and spirit of the Mendocino County Coastal Zoning Code provisions that require restoring or enhancing the overall quality of special environmental resources such as the Gualala Bluff Trail. Unfortunately, the project as currently proposed does not take advantage of that opportunity, and thus fails to conform to county general review criteria.

The applicant proposes to build a retaining structure located well west of the daily bluff edge. All of the adverse effects of the project are directly attributable to the proposed wall location. This is true of the proposed wall on both parcels.

The visual impact of the wall will significantly degrade the appearance of Gualala as the town on a bluff above the river.

The applicant can protect the existing coastal-dependent development and enhance the natural environment of the Gualala Bluff Trail by locating fill-stabilization solutions and site drainage improvements east of the existing bluff trail. Doing so will obviate the need for most of the wall proposed.

At the Surf Super parcel, a timber crib wall aligned along the previous bluff edge is a feasible alternative to the proposed concrete block wall. Such a wall could be built under Special Condition No. 1 as currently written.

The need for a wall at the old pharmacy parcel is dubious. Failing fill placed without a permit should not be considered development that requires protection by further filling of the bluff.

Ms. Beddoe, Mr. Hall and Mr. Merrill
November 12, 2007

Removing the unstable fill may be a better solution for fill stabilization and site drainage improvements than the proposed wall. Unstable fill removal would also make it easier to conform to county grading standards and landform alteration restrictions.

RECOMMENDATIONS

Because the project as proposed fails to comply with key provisions of the Mendocino County Coastal Zoning Code, and suitable alternatives are readily available that can conform to those provisions, **the application for CDP #55-2006 should be denied.**

Since there is a viable and more aesthetically desirable timber alternative to the proposed concrete block wall at parcel APN 145-261-05, **the proposed amendment to Special Condition No. 1 of CDP No. 1-83-270-A1 should be denied.**

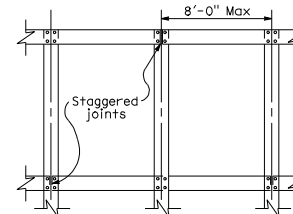
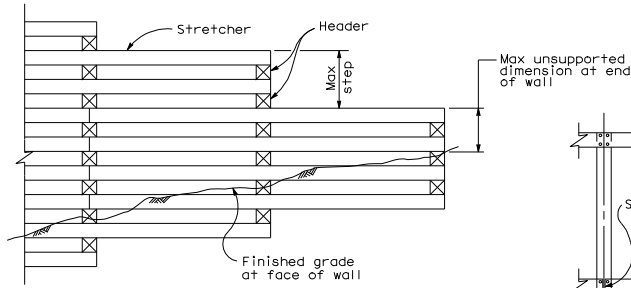
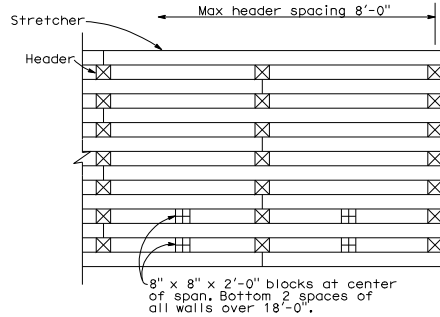
Thank you for considering my comments.

Sincerely Yours,

A handwritten signature in blue ink, appearing to read 'F. Drouillard', with a stylized flourish at the end.

Francis Drouillard, PE
Civil Engineer C 042040
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fdrouillard@opacengineers.com

Attachments: TimberCribWall.pdf
BowerWallAerial.jpg



TYPICAL PLAN VIEW

DIST	COUNTY	ROUTE	POST MILES TOTAL PROJECT	SHEET NO.	TOTAL SHEETS

Overcomer, Z. H. REGISTERED CIVIL ENGINEER

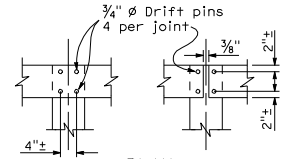
May 1, 2006 PLANS APPROVAL DATE

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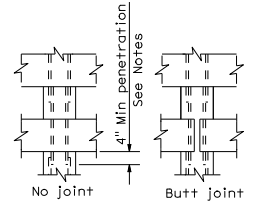
To get to the Caltrans web site, go to <http://www.dot.ca.gov>

OPEN FACE CRIB PARTIAL ELEVATIONS

HEIGHT OF WALL	TIMBER PER 8 FT CRIB SECTION HEADERS				STRETCHERS
	6'-0"	8'-0"	10'-0"	12'-0"	
4'-8"	3				8
6'-0"	4				10
7'-4"	5				12
8'-8"	4	2			14
10'-0"	5	2			16
11'-4"	5	3			18
12'-8"	5	4			20
14'-0"	5	3	2		22
15'-4"	5	4	2		24
16'-8"	5	4	3		26
18'-0"	5	4	4		28
19'-4"	5	4	3	2	32
20'-8"	5	4	4	2	38
22'-0"	5	4	4	3	43



PLAN



ELEVATION

TYPICAL END CONNECTIONS

NOTES:

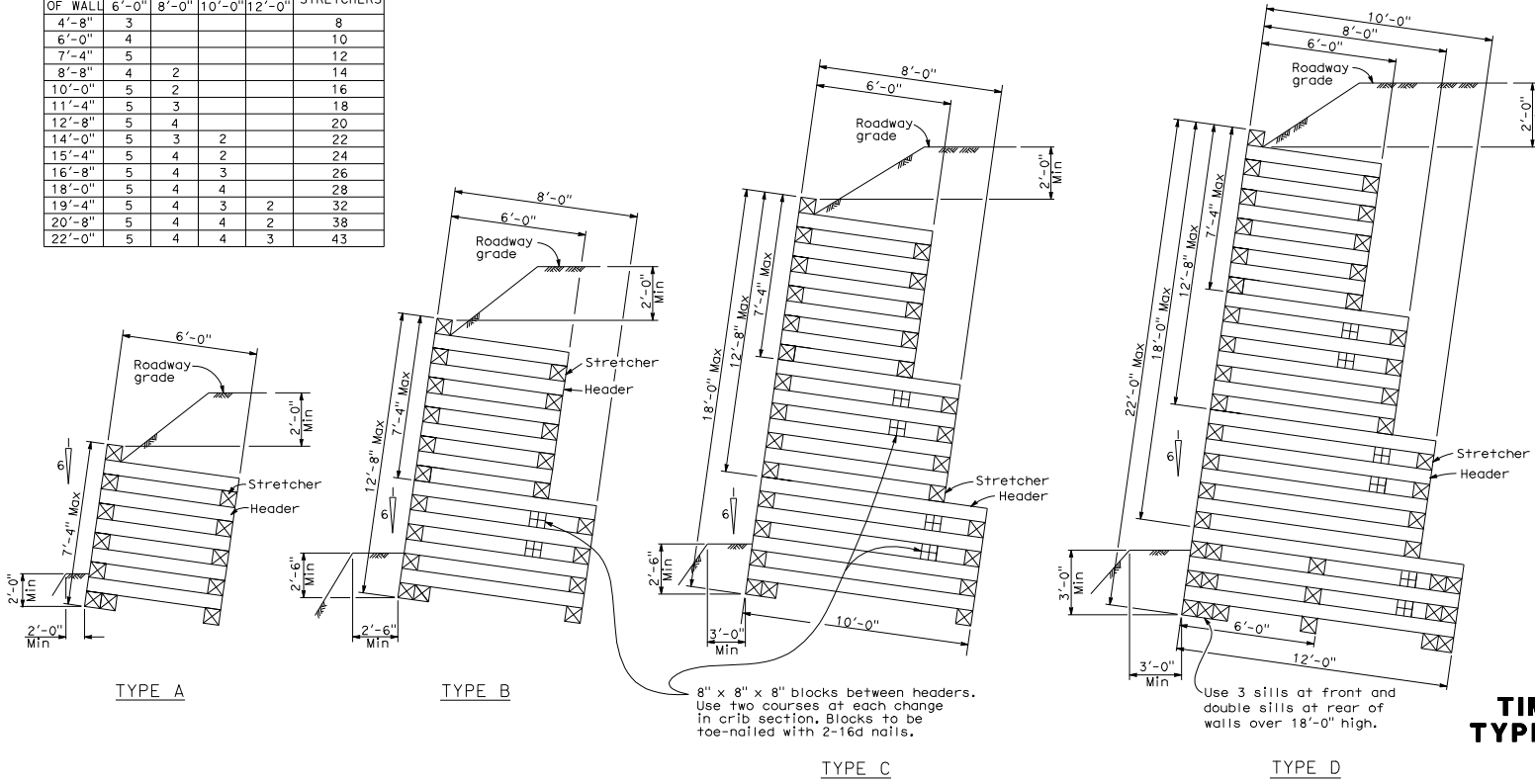
- All timber to be treated 8" x 8" full sawn No. 1 grade douglas fir-larch. All members to be pre-cut before treatment.
- Drift pins and holes to be 3/4" Ø.
- Drift pins to be of sufficient length to penetrate thru 2 members and 4" minimum into the third member. Drift pins shall cross each contact joint between headers and stretchers. Pins may lap, provided edge or end distance to pins is not less than 1 3/4".
- All stretchers to be laid horizontal.
- Vertical walls are not permitted.
- Maximum allowable height is 22'-0".
- All walls 18'-0" high or under shall have double sills at front and single sill at rear; when wall exceeds 7'-4", 12'-8" or 18'-0", use a minimum of two courses of next longer headers.
- For Design Data, see Standard Plan C9B.

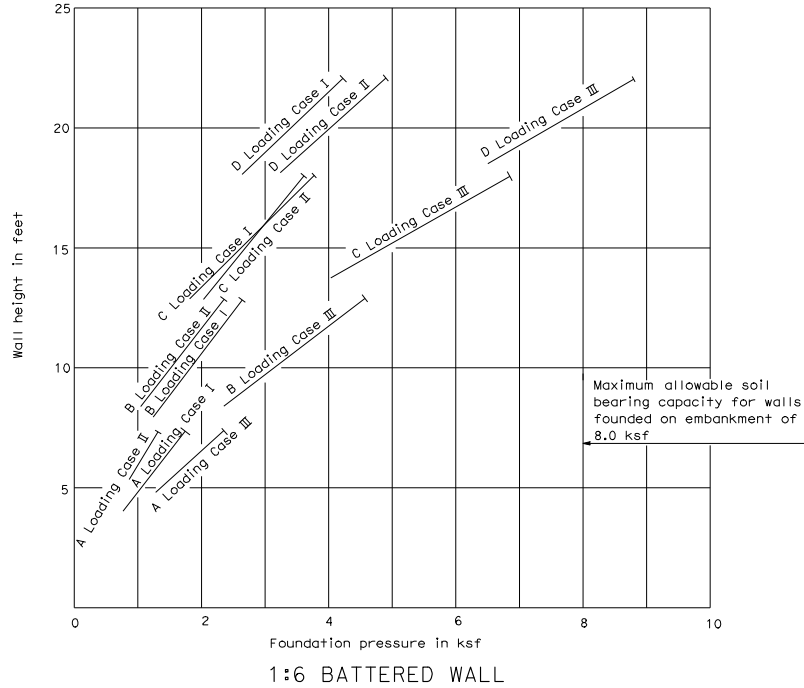
STATE OF CALIFORNIA DEPARTMENT OF TRANSPORTATION

TIMBER CRIB WALL TYPES A, B, C AND D

NO SCALE

C9A





LEGEND FOR GRAPH

- . A, B, C, D = Wall type.
- . Solid lines indicate normal range of wall use. Upper end of line indicates maximum wall height for a given wall type and loading.
- . For description of loading case see DETAIL OF DESIGN LOADING CASES.

DESIGN NOTES:

1. **WALL BASE IN EMBANKMENT:** A minimum depth of 5' of embankment at 95% relative soil compaction is required below the base of all walls in order to constitute an embankment condition. When the foundation pressure is between 5.0 ksf and 8.0 ksf embankment below the wall shall consist of "Structure backfill" material as set forth in Section 19-3.06 of the Standard Specifications. The limits of relative compaction (95%) shall be as set forth in Section 19-5.03 of the Standard Specifications.
2. **WALL BASE IN ORIGINAL GROUND:** Allowable soil pressure at toe of wall shall be determined by foundation site investigation. Walls that are to retain cut slopes shall be designed for lateral and toe pressures determined from site investigation data. Overall stability of slope with wall in place must be analyzed. If original ground slopes away from toe of wall, reduction in allowable bearing capacity due to slope must be considered. Walls shall not be founded in original ground having an allowable bearing capacity of less than 3.0 ksf. Consideration should be given to removal and replacement of unsuitable material with "Structure backfill" material as set forth in Section 19-3.06 of the Standard Specifications. The limits of relative compaction (95%) shall be as set forth in Section 19-5.03 of the Standard Specifications.
3. **Soil Parameters;**
 Backfill - $\phi = 34^\circ$, $\gamma = 120$ LB/CF
 Foundation - $\phi = 34^\circ$
 Lateral earth pressure determined by Rankine Theory.

DESIGN EXAMPLES

EXAMPLE No. 1

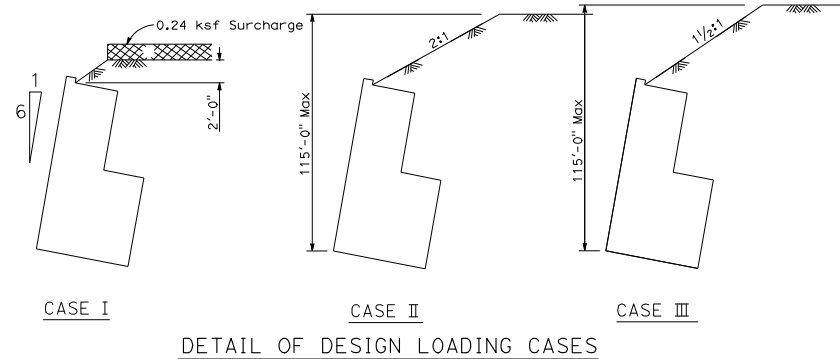
Given: Wall height 14'
 Design Loading Case II.
 Base in embankment (5' depth minimum See Note 1)
 Select: 1:6 batter "C" wall gives 2.5 ksf foundation pressure.
 Vertical Wall not permitted.
 See chart for required numbers and sizes of timber members.

EXAMPLE No. 2

Given: Wall height 19'-4"
 Design Loading Case III. Base is in original ground.
 Foundation site investigation determines the allowable soil bearing capacity at 6.0 ksf.
 Select: 1:6 batter "D" wall gives 7.5 ksf foundation pressure.
 Vertical wall not permitted. Since foundation pressure is greater than allowable bearing capacity of native material, replace original material with "Structure backfill" to increase base bearing capacity. (See Note 2)

EXAMPLE No. 3

Given: Wall height 22'
 Design Loading Case II. Base is in embankment.
 (See Note 1)
 Select: 1:6 batter "D" wall gives 5.2 ksf foundation pressure.
 Vertical wall not permitted. Foundation pressure is less than 5.0 ksf. Base material below wall shall be compacted to a relative compaction of 95%. (See Note 1).



STATE OF CALIFORNIA
 DEPARTMENT OF TRANSPORTATION
**TIMBER CRIB WALL
 TYPES A, B, C AND D
 DESIGN DATA**

NO SCALE

C9B

DIST	COUNTY	ROUTE	POST MILES TOTAL PROJECT	SHEET NO.	TOTAL SHEETS
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Proposed Fill of Bluff

Proposed Finished Grade

Bottom of Proposed Wall