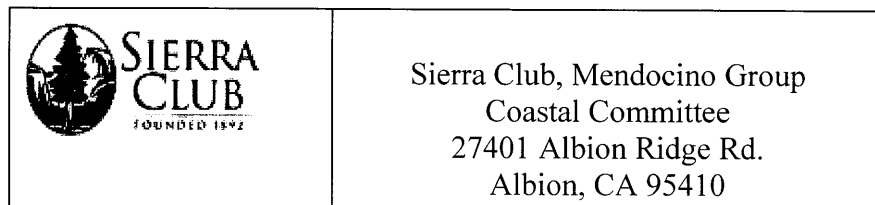


From: Rixanne Wehren, Chair, Sierra Club, Mendocino Group  
 To: Mendocino Coastal Permit Administrator, Planning staff and Coastal Commission  
 Re: CDP\_2017-0038, Kirkman & Kawase project

Date: May 12, 2021



**RECEIVED**  
 MAY 12 2021

Planning Services

May 12, 2021

Dear Planners,

The Sierra Club has long been concerned with the protection of coastal resources along the California Coast, especially the California Coastal Trail and associated trails, and the scenic resources that are so important to our residents and visitors. In particular we are interested in the Highly Scenic Area designations along the Mendocino Coast adjacent to Highway 1.

It has come to our attention that a residential development has been proposed for a parcel on Navarro Head, about 2 miles south of Albion. The Kirkman project (CDP-2017-0038) proposes a 3383 square-foot, two-story house and garage, another 100 sq. feet of covered deck and walkways, three 20' windmills, two water tanks, and two solar arrays, all of which would be highly visible from Highway 1 and from the public Navarro Point Preserve.

While the Highly Scenic Area maps show the project as slightly outside of the designated HSA area, there is quite a bit of dissension among Albion residents as to the actual scenic values that were recognized and evaluated to establish that line. The study that led to the drawing of the map was conducted in prior to and accepted in 1985. Fortunately at least one of the elected members of the Albion Citizens Advisory Committees, which was involved in the study, is still in the community and remains certain that the entire Navarro Head (aka Navarro Headlands Knoll) was to be included in the Highly Scenic Designation. Although we have not yet been able to access the minutes of those meetings, nor a staff report on the designations, we anticipate receiving those documents through the Public Records Act process.

If the Kirkman project had come anywhere close to the recommendations for the Highly Scenic Areas, our interest might not have been sparked, but instead the house is completely out of place in the viewshed. With a 26' elevation on the most visible side, plus the two water tanks below, the house would stick out like a sore thumb above the ridgeline, visible from every car traveling south on Highway 1. A huge horizontal expanse of glass windows and doors (perhaps as much as 100' wide)\* would reflect the afternoon and setting sun right back into the car windshields. This undisturbed hillside and ridge would become one more building spread out along the ridge in flagrant disregard for the policies of the Local Coastal Plan. [\* The expanse is hard to determine since the floor plan has no scale and the dimensions are unreadable.]

The Local Coastal Plan allows for reconsideration of the Highly Scenic Areas to reflect the Policies. We find the following Policies to be particularly relevant, especially section 3.5.6. (bold emphasis - Ed.)

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## Coastal Act Requirements

Protection of visual resources is a specific mandate of the Coastal Act:

30251. The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas to minimize alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas.

## County Coastal Element – Chapter 3

3/5

Coastal Element Policies: Visual Resources; Special Communities and Archaeological Resources

## 3.5.1

...

New development in highly scenic areas designated by the County of Mendocino Coastal Element shall be **subordinate** to the character of its setting.

3.5-3 The visual resource areas listed below are those which have been identified on the land use maps and shall be designated as "highly scenic areas," within which new development shall be subordinate to the character of its setting. Any development permitted in these areas shall provide for the protection of ocean and coastal views from public areas including highways, roads, coastal trails, vista points, beaches, parks, coastal streams, and waters used for recreational purposes.

...

In addition to other visual policy requirements, new development west of Highway One in designated "highly scenic areas" is limited to **one-story** (above natural grade) unless an increase in height would not affect public views to the ocean or be out of character with surrounding structures. ... New development should be subordinate to natural setting and minimize reflective surfaces. All proposed divisions of land and boundary line adjustments within "highly scenic areas" will be analyzed for consistency of potential future development with visual resource policies and **shall not be allowed** if development of resulting parcel(s) could not be consistent with visual policies.