



**COUNTY OF SAN LUIS OBISPO  
DEPARTMENT OF PLANNING AND BUILDING  
STAFF REPORT**

**Tentative Notice of Action**

*Promoting the wise use of land  
Helping build great communities*

|  |   |  |                                    |
|--|---|--|------------------------------------|
| <b>MEETING DATE</b><br>September 4, 2015<br><b>LOCAL EFFECTIVE DATE</b><br>September 18, 2015<br><b>APPROX FINAL EFFECTIVE DATE</b><br>October 9, 2015   | <b>CONTACT/PHONE</b><br>Megan Martin, Planner II<br><a href="mailto:mamartin@co.slo.ca.us">mamartin@co.slo.ca.us</a><br>(805)781-4163 | <b>APPLICANT</b><br>Carol Waltos             | <b>FILE NO.</b><br>DRC2014-00092   |
| <b>SUBJECT</b><br>Hearing to consider a request by <b>CAROL WALTOS</b> for a Minor Use Permit/Coastal Development Permit (DRC2014-00092) to allow the construction of a two-story 2,400 square foot mixed use building with 1,200 square feet of office space on the first floor and one, 1,200 square foot residence on the second floor with an attached garage. The project also includes a request to modify the parking standards established in Section 23.04.160 by reducing the required number of spaces from 5 to 4. The project will result in the disturbance of the entire parcel through development, landscaping and associated improvements. The building will be approximately 26'-3" in height above natural grade. The maximum allowable height for this area is 28 feet above average natural grade. The project site is within the Office Professional land use category within the Central Business District located at 696 South Ocean Avenue in the community of Cayucos. The site is in the Estero planning area. |   |  |                                    |
| <b>RECOMMENDED ACTION</b><br>Approve Minor Use Permit DRC2014-00092 based on the findings listed in Exhibit A and the conditions listed in Exhibit B.  |   |  |                                    |
| <b>ENVIRONMENTAL DETERMINATION</b><br>A Class 3 Categorical Exemption was issued on July 20, 2015 (ED15-017).  |   |  |                                    |
| <b>LAND USE CATEGORY</b><br>Office Professional  | <b>COMBINING DESIGNATION</b><br>Central Business District, Coastal Zone, Coastal Appealable   | <b>ASSESSOR PARCEL NUMBER</b><br>064-145-037 | <b>SUPERVISOR DISTRICT(S)</b><br>2 |
| <b>PLANNING AREA STANDARDS:</b><br>Estero Planning Area – Cayucos Urban Area Standards, Central Business District, Mixed-Use Development, Office/Professional Category, Commercial Category<br>Does the project meet applicable Planning Area Standards: Yes - see discussion  |   |  |                                    |
| <b>LAND USE ORDINANCE STANDARDS:</b><br>Setbacks, Parking, Parking Adjustment, Residential Uses in Office and Professional or Commercial Categories<br>Does the project conform to the Land Use Ordinance Standards: Yes - see discussion  |   |  |                                    |
| <b>FINAL ACTION</b><br>This tentative decision will become the final action on the project, unless the tentative decision is changed as a result of information obtained at the administrative hearing or is appealed to the County Board of Supervisors pursuant Section 23.01.042 of the Coastal Zone Land Use Ordinance; effective on the 10th working day after the receipt of the final action by the California Coastal Commission. The tentative decision will be transferred to the Coastal Commission following the required 14-calendar day local appeal period after the administrative hearing.<br><br>The applicant is encouraged to call the Central Coast District Office of the Coastal Commission in Santa Cruz at (831) 427-4863 to verify the date of final action. The County will not issue any construction permits prior to the end of the Coastal Commission process.  |   |  |                                    |

---

---

ADDITIONAL INFORMATION MAY BE OBTAINED BY CONTACTING THE DEPARTMENT OF PLANNING & BUILDING AT:  
COUNTY GOVERNMENT CENTER γ SAN LUIS OBISPO γ CALIFORNIA 93408 γ (805) 781-5600 γ FAX: (805) 781-1242

|  |                                   |
|--|-----------------------------------|
| EXISTING USES:<br>Vacant   |                                   |
| SURROUNDING LAND USE CATEGORIES AND USES:<br>North: Office Professional / Single Family Residences<br>East: Residential Multi-Family / Single Family Residences<br>South: Residential Single Family / Single Family Residences<br>West: Residential Single Family / Single Family Residences     |                                   |
| OTHER AGENCY / ADVISORY GROUP INVOLVEMENT:<br>The project was referred to: Public Works, Building Division, HEAL SLO, County Service Area 10, Cayucos Fire, Cayucos Sanitary District, Paso Robles Beach Water Association (Cayucos), Coastal Commission, and Cayucos Citizens Advisory Council. |                                   |
| TOPOGRAPHY:<br>Relatively level  | VEGETATION:<br>None               |
| PROPOSED SERVICES:<br>Water supply: Paso Robles Beach Water Association<br>Sewage Disposal: Community sewage disposal system<br>Fire Protection: Cayucos Fire  | ACCEPTANCE DATE:<br>July 14, 2015 |

**DISCUSSION**

PLANNING AREA STANDARDS:

ESTERO AREA PLAN – CAYUCOS URBAN AREA STANDARDS

**Communitywide**

**A. Resource Capacity and Service Availability.**

Land Divisions and Land Use Permits: Application Content. All applications for new land divisions and land use permits for new development shall be accompanied by letters from the applicable water purveyor and the Cayucos Sanitary District stating their intent to serve the proposed project

*Staff Response: The proposed project complies with this standard. The applicant submitted a letter from Paso Robles Beach Water Association (water purveyor) and Cayucos Sanitary District stating their intent to serve the proposed project.*

**C. Parking Lot Design – Central Business District.**

The following standards are intended to facilitate a more pedestrian-friendly environment downtown. These standards apply to publicly and privately-owned parking lots in the central business district that are defined as vehicle storage per Table O in Coastal Framework for Planning, or are accessory to another allowable principal use.

1. Parking Lot Location. Where feasible, locate parking areas to the rear or side of buildings.
2. Access. Minimize the number of driveways. Where feasible, access to parking areas shall be taken from side streets, alleys, or the less busy street.
3. Size of Parking Areas. Wherever possible, separate the parking lot into smaller, connected areas of 20 or less cars, interrupted by planted areas and sidewalks.

4. **Pedestrian Connections.** Wherever possible, provide safe, convenient, and landscaped pedestrian connections between parking areas, walkways and businesses; and between businesses and surrounding neighborhoods.

*Staff Response: The project complies with these standards. The parking area for the proposed office use is located at the side of the building along 7<sup>th</sup> Street and will utilize only one driveway. The parking area will consist of two (2) parking spaces, one handicapped accessible. The applicant will be required to install sidewalk as a part of this development and pedestrians and/or visitors to the site will be to conveniently and safely walk between the proposed business and the surrounding neighborhood.*

### **Commercial Retail**

#### **C. Central Business District**

The following standards apply within the central business district:

1. **Building Location.** In order to create a pedestrian-friendly environment, locate the front facades of new buildings adjacent to the street or other public spaces such as internal plazas.

*Staff Response: The proposed project complies with this standard. The mixed-use development includes a small patio area between the county right-of-way (S. Ocean Avenue) and the building.*

2. **Pedestrian Connections.** Wherever possible, provide safe, convenient and landscaped pedestrian connections between parking areas, walkways and businesses; and between businesses, recreation areas, and surrounding neighborhoods.

*Staff Response: The proposed project includes the development of curb, gutter and sidewalk along South Ocean Avenue and 7<sup>th</sup> Street, providing safe and convenient access for pedestrians to the surrounding neighborhood. This project complies with these requirements.*

4. **Building Height, Mass, Scale, and Pedestrian Orientation, Ocean Avenue.** The following standards are intended to reduce the visual massing of buildings in the central business district, while allowing a wide range of two-story building designs. The following standards apply only to properties having frontage on Ocean Avenue

- a. **Measurement of Height:** Building and plate heights shall be measured from the center line of Ocean Avenue, at a point midway between the two side property lines projected to the street center line, to the highest point of the structure. However, on lots having an average natural grade less than the Ocean Avenue center line elevation--as measured above--building and plate heights shall be measured from the average natural grade of the lot to the highest point of the structure.

*Staff Response: The existing lot has an average natural grade less than the Ocean Avenue center line elevation. The proposed development shall be*

*measured from the average natural grade of the lot to the highest point of the structure. The project complies with this requirement.*

- b. **Building Height.** All proposed development, including additions and building replacement, shall meet all of the following:

- (1) Buildings shall be no more than two stories, not to exceed 28 feet in height. Basements, parking areas and building floors that are six feet or more below street level and that have a finished floor not more than four feet above street level do not count as a story.

*Staff Response: The proposed project complies with this standard. The proposed mixed-use development will be approximately 26'-3" in height above average natural grade.*

- (2) **Maximum plate height.** Maximum plate height shall be 24 feet. Above that height, only pitched roofs or decorative elements are allowable.

*Staff Response: The proposed project complies with this standard. The first floor plate height of the proposed mixed-use development will be approximately 9 feet above average natural grade. Second floor plate height will be approximately 19 feet above average natural grade.*

- (3) **Wall face measurements.** No wall facing a public street shall be greater than 24 feet above finished grade. No other wall shall be greater than 28 feet above finished grade.

*Staff Response: The proposed project complies with this standard. The proposed mixed-use development has broken up its building faces on both South Ocean Avenue and 7<sup>th</sup> Street with significant articulation and architectural details providing visual relief that decreases the massing of the structure.*

6. **Mixed Use Development.** The following standards are intended to encourage provision of a mixture of residential and non-residential uses on the same site in appropriate locations, consistent with the intent of this visitor-serving priority area. Such mixed-use development can increase opportunities for development of affordable housing. Development of non-visitor-serving uses in accordance with these standards will not prejudice the provision of adequate visitor-serving facilities to meet the foreseeable demand during the horizon of this plan. Residential development shall be subject to the standards in Chapter 23.08 of the Coastal Zone Land Use Ordinance--Residential uses in Office and Professional or Commercial categories--except that where those standards conflict with the following standards, the following standards shall prevail.

- a. **Findings Required.** Before approving an application for a mixed-use development, the review authority shall make the following findings, in addition to those required by Chapter 23.08 of the Coastal Zone Land Use Ordinance:

- i. Mixed-use development will not remove or convert existing lower-cost visitor-serving or recreational facilities unless replaced by a facility offering comparable opportunities.
- ii. Mixed-use development will not adversely affect parking and access for existing or future visitor-serving and recreational uses. In particular, new residential uses will not diminish opportunities for parking for existing or expanded visitor serving or recreational uses on the same site. This finding may be satisfied if new residential development is accompanied by new visitor-serving or recreational development on the same site.

*Staff Response: The proposed project would not remove or convert visitor-serving or recreational uses because the project includes the development of a new mixed-use building on a vacant lot, surrounded by existing single family residences and office uses. In addition, the proposed project will not adversely affect parking and access for existing or future visitor-serving and recreational uses because the lot is currently the last remaining lot on the block to be developed and will provide parking for both of the proposed office and residential uses on the site. This project complies with these requirements.*

- b. **Secondary Use.** Residential development shall be subordinate to the primary non-residential use(s) on the same site. Residential development, excluding garages, shall comprise no more than 50% of the floor area of the primary non-residential use, except that where this results in a residential floor areas of less than 1,200 square feet, the review authority may approve a greater amount of residential floor area, up to the amount of the primary non-residential use and not to exceed 1,200 square feet.

*Staff Response: The proposed project complies with this standard. The proposed mixed-use development includes a 1,200 square foot residence to be located entirely on the second floor of the building with a 1,200 square foot office on the first floor of the building. The residence will be subordinate to the office use on the same site.*

- c. **Location.** Residential development shall only be located on the second or upper story--above the primary non-residential use.

*Staff Response: The proposed project complies with this standard because the residential component will be located entirely on the second/upper story of the primary non-residential office use.*

- d. **Parking.** Residential development shall have one (1) on-site parking space per bedroom, with a minimum of two spaces per unit.

*Staff Response: The proposed residential development will have two parking spaces on-site located within a proposed garage. This project complies with this requirement.*

- e. **Floor Area and Open Area.** The maximum floor area and minimum open area requirements in Chapter 23.04 of the Coastal Zone Land Use Ordinance shall not apply. Instead, the land use permit shall require an amount of private open space and common area for privacy, recreation, light, and air that is appropriate for the nature of the project.

*Staff Response: The proposed project complies with this standard. The project includes two areas of private open space and common area for privacy, recreation, light, and air that is appropriate for the nature of the project. The office use will be able to utilize a small patio area at the front of the building adjacent to South Ocean Avenue and the residence will utilize a small 10 foot patio area at the rear of the lot.*

- f. **Residential Density.** Maximum residential density shall be 10 dwelling units per acre, calculated using the acreage of the entire mixed use site.

*Staff Response: The proposed project complies with this standard. Based on the acreage of the site (0.9 acres or 4,000 square feet), the project is allowed one (1) residential dwelling unit on the site. The project includes the development of one (1) residence on the site and therefore complies with the requirements of this standard.*

- g. **Total Residential Development.** The total amount of residential development, including caretaker residences, within the central business district shall not exceed 96 dwelling units.

*Staff Response: The development of the single family dwelling unit would bring the total number of dwellings in the Central Business District up to the 40-45 range, well below the 95 maximum.*

## **Office and Professional**

### **A. South Ocean Avenue East of 4th Street**

The following standards apply only to the area along South Ocean Avenue east of 4th Street:

1. **Building Height, Mass, Scale, and Pedestrian Orientation.** For properties having frontage on South Ocean Avenue, all proposed development, including additions and building replacement, shall comply with the preceding Commercial Retail category standards for building height, mass, scale, and pedestrian orientation on Ocean Avenue.

*Staff Response: The Commercial Retail land use category standards require development to reflect western, Victorian or nautical/seaside architecture and to provide a detailed façade plan at the time of application. The architectural character of the building shall show articulation of building facades to create relief and visual interest. In addition, the Commercial Retail land use category allows for building height to be a maximum of 30 feet, except as otherwise required in the Central Business District. These standards are described in detail above under the "Central Business District" section of this staff report.*

*The proposed project complies with the standards outlined in the Commercial Retail land use category. The applicant provided a detailed façade plan that provided significant articulation of building facades that created relief and visual interest. The proposed development is consistent with existing development in the immediate vicinity. In regards to maximum allowable height, the proposed project is subject to the requirements of the Central Business District, not to exceed a maximum height of 28 feet above average natural grade.*

2. **Mixed-Use Development.** Development of residential and non-residential uses on the same site shall be subject to all preceding mixed-use development standards and guidelines for the Commercial Retail category.

*Staff Response: The proposed project complies with this standard. Refer to the “Mixed-Use Development” section described above.*

#### COASTAL ZONE LAND USE ORDINANCE STANDARDS:

##### **Section 23.01.043 – Appeals to the Coastal Commission**

The proposed project is appealable to the Coastal Commission because the mixed-use residential and office development is characterized in Coastal Table O, Part I of the Land Use Element as a “Special Use” (S-8), and is therefore appealable.

##### **Section 23.04.100 – Setbacks**

Front Setbacks – Commercial and office categories. No front setbacks are required within a central business district; a 10-foot front setback is required in Commercial and Office categories elsewhere.

*Staff Response: The proposed project complies with this standard. The project site is located within the Central Business District of the community of Cayucos and no front setback is required. The project complies with this standard and proposes an 8 foot front setback from the property line.*

Side Setbacks – Corner lots. The side setback on the street side corner of a corner lot within urban and village areas on sites of less than one acre in net area is to be a minimum of 10 feet, except that in a central business district, no side setback is required.

*Staff Response: The project site is within the Central Business District of the community of Cayucos. No side setback is required. The project proposes variable street side setbacks ranging from 1 ½ feet to 7 feet from the property line. The proposed interior side setback is approximately 4 ½ feet from the property line.*

Rear Setbacks – Office and Professional and Recreation Categories. The rear setback is to be a minimum of 10 feet, except in a Central Business District, no rear setback is required except if adjacent to an alley, the rear setback is to be five feet.

*Staff Response:* The project site is within the Central Business District therefore no rear setback is required. However, after evaluating the site, staff finds that the location is adjacent to a residential use and therefore, an increased setback is required. The project is conditioned to maintain a 10-foot setback from the rear property line. The applicant is required to submit revised plans which will remove a staircase within the rear setback area at the time of application for construction permits.

#### **Section 23.04.116 – Projections into Required Setbacks**

Decks. When constructed higher than 30 inches above the surrounding finished grade, a wood deck may extend into required setbacks as follows:

Rear Setback. A deck may occupy up to 30% of a required setback, but is to extend no closer than three feet to the rear property line.

*Staff Response:* The proposed project includes a deck on the second floor attached to the proposed residence. The deck, as proposed, extends into the required setback (as described above) by one (1) foot, exceeding the maximum 30% standard. The project is conditioned to revise the site plan and comply with the 30% standard at the time of application for construction permits.

#### **Section 23.04.160 – Parking and Loading**

Modification of parking standards. The parking standards of this chapter may be modified as follows:

Permit Requirements. Proposals to reduce the required number of parking spaces or to modify any of the other parking standards of this chapter may be authorized through Minor Use Permit approval.

*Staff Response:* The applicant is requesting to modify the parking standards of this section to allow for four (4) parking spaces instead of five (5) through the approval of this Minor Use Permit.

Criteria for approval. Proposed modifications of parking standards shall be approved only where the specific findings of fact can first be made:

- (1) The characteristics of the site, or its immediate vicinity do not necessitate the number of parking spaces, type of design, or improvements required by this chapter; and
- (2) Reduced parking or an alternative to the parking design standards of this chapter will be adequate to accommodate on the site all parking needs generated by the use, or that additional parking is necessary because of specific features of the use, site, or site vicinity; and
- (3) No traffic safety problems will result from the proposed modification of parking standards.

*Staff Response:* Modification of parking standards required by Coastal Zone Land Use Ordinance Section 23.04.160 is justified in this case because of the characteristics of the use or

*its immediate vicinity which do not necessitate the need for 5 parking spaces. The office portion of the mixed-use development is not anticipated to generate traffic that would otherwise necessitate the need for the additional parking; and the reduced parking (4 spaces) will be adequate to accommodate all parking needs generated by the use.*

**Section 23.04.166 – Required Number of Parking Spaces**

Mixed function buildings and storage areas. Where a building (or separate tenancy rental space within a building) occupied by a single use contains several functions (such as sales, office and storage areas), parking is to be as required for the principal use, for the gross floor area (total area of all internal functions), except where the parking standards in subsection c set special requirements for functional areas within a principal use (e.g., active use area and storage area). Where subsection c does not identify specific requirements for storage areas within a principal use and the principal use contains storage areas larger than 2,000 square feet, the parking requirement is to be determined separately for those areas, as specified for warehousing in subsection c(11) of this section.

*Staff Response: The proposed project does not comply with this standard. The principal use is the office use to be located on the lower level of the structure. Section 23.04.166 requires office and professional uses to designate on site 1 parking space for every 400 square feet of floor area. The office space will be approximately 1,200 square feet and therefore required to supply three (3) on-site parking spaces, with one of those three to be handicapped accessible (Section 23.04.166(b)(1)). The project proposes two (2) on-site parking spaces for the office use and is requesting a parking modification with this Minor Use Permit to allow for the reduced number of parking spaces. The proposed residence is required to provide 2 spaces per dwelling on site. The proposed project will provide 2 spaces for the residence within the proposed garage.*

**Section 23.08.162 – Residential Uses in Office and Professional Category**

Single Family and Multi-Family dwellings identified as S-8 uses in the Office and Professional or Commercial Retail categories are subject to the standards of this section; except for Caretaker Residences.

Limitation on use - Office and Professional category. Except where prohibited by planning area standards of the Land Use Element new single family or multi-family dwellings are allowed in an Office and Professional category, provided that they are:

- (1) Located on either the second floor and/or the rear of the site, and structurally attached to the main building. The first floor or front part of the building shall be used for the principal office use; and
- (2) Subordinate to the primary office use of the site; or
- (3) Multi-family residential development as a principal use authorized through Development Plan approval, in an Office and Professional category where planning area standards of the Land Use Element allow residential development as a principal use.

*Staff Response: The proposed project complies with this standard. The site is not prohibited by planning area standards and may have a mixed-use residential and office building within the Office and Professional category. The residence will be located entirely on the second floor and structurally attached to the main building. The first floor will be used for office space and will be the primary use of the site.*

Permit requirements.

- (1) The land use permit required to authorize residential uses pursuant to this section shall be the same as that required by this title for the principal use of the site; except that where Section 23.03.040 would require a higher permit level for the residential uses, the higher permit shall be required.
- (2) When Minor Use Permit or Development Plan approval is required by this title to authorize the proposed residential use, the applicable approval body shall, before granting such approval, find that the proposed residential use will not:
  - i. Significantly reduce the community inventory of office or commercial property available to satisfy the commercial needs of the population envisioned by the Land Use Element of the General Plan.
  - ii. Impede the continuing orderly development of community shopping and office areas with office and other commercial uses.

*Staff Response: The project, as proposed, is required to submit for a Minor Use Permit because the project is within an appealable area of the coastal zone, where, any use normally required by Title 23 to have Plot Plan approval, shall instead require Minor Use Permit approval.*

*The proposed use will not significantly reduce the community inventory of office property available to satisfy the needs of the population envisioned by the Land Use Element of the General Plan, because the proposed project is a mixed-use development and includes development of 1,200 square feet of office space on the first floor with an upstairs 1,200 square foot residential component.*

*The proposed use will not impede the continuing orderly development of community shopping areas with commercial and office uses, because the project will not reduce community inventory of office property, includes ground floor office space, and incorporates parking for the office use.*

Minimum Site area and density. To be as required by Section 23.04.084 (Residential – Multi-Family Dwellings), or applicable planning area standards of the Land Use Element.

*Staff Response: The proposed project complies with this standard. Section 23.04.084 requires a minimum 6,000 square feet of site area to establish more than one dwelling unit on the site. The project site is approximately 4,000 square feet and is proposing one residential dwelling unit on the property.*

Parking.

- (1) When a commercial and residential use are located on the same site, the number of parking spaces provided is to be 80% of the total required for each residential and commercial use on the same site by Section 23.04.160 (Parking).
- (2) All parking for a residential use in a Commercial Retail, Commercial Service or Office and Professional category is to be located on-site.

*Staff Response: The proposed project complies with this standard. Item 1 is not applicable and all parking will be located on-site.*

COASTAL PLAN POLICIES:

Shoreline Access: N/A  
Recreation and Visitor Serving: N/A  
Energy and Industrial Development: N/A  
Commercial Fishing, Recreational Boating and Port Facilities: N/A  
Environmentally Sensitive Habitats: N/A  
Agriculture: N/A  
Public Works:  Policy No(s): 1  
Coastal Watersheds: N/A  
Visual and Scenic Resources: N/A  
Hazards: N/A  
Archeology: N/A  
Air Quality: N/A

***Does the project meet applicable Coastal Plan Policies:*** Yes, as conditioned.

COASTAL PLAN POLICY DISCUSSION:

**Public Works**

Policy 1 - Availability of Service Capacity. New development (including divisions of land) shall demonstrate that adequate public or private service capacities are available to serve the proposed development, a finding shall be made that there are sufficient services to serve the proposed development given the already outstanding commitment to existing lots within the urban service line for which services will be needed consistent with the Resource Management System where applicable. Permitted development outside of the USL shall be allowed only if:

- a. It can be serviced by adequate private on-site water and waste disposal systems;  
and
- b. The proposed development reflects that it is an environmentally preferable alternative.

*Staff Response: The applicant received intent to serve letter from the Cayucos Sanitary District and Paso Robles Beach Water Association on July 9, 2015. It appears there are adequate services to support the development. At the time of application for building permits, the applicant will be required to provide evidence that the Cayucos Sanitary District and Paso Robles Beach Water Association is willing and able to serve the property.*

COMMUNITY ADVISORY GROUP COMMENTS:

The Cayucos Citizens' Advisory Council reviewed the project on May 6, 2015 and recommended that the Review Authority support the project with one parking space waiver. No further issues were identified.

AGENCY REVIEW:

Public Works- Public Works comments have been included in Exhibit B – Conditions of Approval as applicable.

Building Division – Comments included in Exhibit B – Conditions of Approval as applicable. (Mike Stoker, March 2, 2015).

Cayucos Fire Protection District – “No Comments.” (Darrin Carlson, February 19, 2015).

HEAL SLO – “We are fully supportive of this development.” (March 18, 2015, HEAL SLO)

Cayucos Sanitary District – A conditional sewer will serve letter will be required.

Paso Robles Beach Water Association – No comments received.

California Coastal Commission – No comments received.

LEGAL LOT STATUS:

The parcel is Lot 5 in Block 9 of Paso Robles Beach No. 1 according to map recorded September 11, 1922 in Book 3, Page 115 of Maps, and was legally created by deed at a time when that was a legal method of creating parcels.

Staff report prepared by Megan Martin and reviewed by Ryan Hostetter and Steve McMasters.