

CALIFORNIA COASTAL COMMISSION

South Coast Area Office
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Th6c

Filed: 1/20/15
180th Day: 7/9/15
Staff: F. Sy-LB
Staff Report: 5/21/15
Hearing Date: 6/11/15

STAFF REPORT: CONSENT CALENDAR

Application No.: 5-14-01840

Applicants: Duane and Janet Brown

Agent: William Guidero

Location: 3503 Seashore Drive, City of Newport Beach (County of Orange)

Project Description: Demolition of an existing two-story duplex with an attached garage and construct a new 2,985 square foot, three-story duplex with an attached 372 square foot two (2) garage and two (2) car carport on a beach fronting lot. Grading will consist of 34 cubic yards of fill.

Staff Recommendation: Approval with conditions.

SUMMARY OF STAFF RECOMMENDATION

The applicants are proposing the demolition of an existing duplex and construction of a new duplex on a beach fronting lot. The major issues raised by this proposed development concern beachfront development that could be affected by waves, erosion, storm conditions, and sea level rise or other natural hazards in the future.

Due to its oceanfront location, the project site may be potentially exposed to the hazard of waves, erosion, storm conditions, sea level rise or other natural hazards. However, the project is consistent with previous Commission approvals in the area and conditions have been imposed in order to minimize potential adverse impacts from the development consistent with Coastal Act.

Staff is recommending **approval** of the proposed project with Seven (7) Special Conditions regarding: 1) assumption of risk; 2) no future shoreline protective device; 3) storage of construction

materials, mechanized equipment, and removal of construction debris; 4) conformance with the submitted drainage and run-off control plan; 5) landscape controls; 6) future development; and 7) a deed restriction against the property, referencing all of the Special Conditions contained in this staff report.

I. MOTION AND RESOLUTION

Motion: *I move that the Commission approve the Coastal Development Permit applications included on the consent calendar in accordance with the staff recommendations.*

Staff recommends a **YES** vote. Passage of this motion will result in approval of all the permits included on the consent calendar. The motion passes only by affirmative vote of a majority of the Commissioners present.

Resolution: *The Commission hereby approves a Coastal Development Permit for the proposed development and adopts the findings set forth below on grounds that the development as conditioned will be in conformity with the policies of Chapter 3 of the Coastal Act and will not prejudice the ability of the local government having jurisdiction over the area to prepare a Local Coastal Program conforming to the provisions of Chapter 3. Approval of the permit complies with the California Environmental Quality Act because either 1) feasible mitigation measures and/or alternatives have been incorporated to substantially lessen any significant adverse effects of the development on the environment, or 2) there are no further feasible mitigation measures or alternatives that would substantially lessen any significant adverse impacts of the development on the environment.*

II. STANDARD CONDITIONS

This permit is granted subject to the following standard conditions:

1. **Notice of Receipt and Acknowledgment.** The permit is not valid and development shall not commence until a copy of the permit, signed by the permittee or authorized agent, acknowledging receipt of the permit and acceptance of the terms and conditions, is returned to the Commission office.
2. **Expiration.** If development has not commenced, the permit will expire two years from the date on which the Commission voted on the application. Development shall be pursued in a diligent manner and completed in a reasonable period of time. Application for extension of the permit must be made prior to the expiration date.
3. **Interpretation.** Any questions of intent or interpretation of any condition will be resolved by the Executive Director or the Commission.

4. **Assignment.** The permit may be assigned to any qualified person, provided assignee files with the Commission an affidavit accepting all terms and conditions of the permit.
5. **Terms and Conditions Run with the Land.** These terms and conditions shall be perpetual, and it is the intention of the Commission and the permittee to bind all future owners and possessors of the subject property to the terms and conditions.

III. SPECIAL CONDITIONS

1. Assumption of Risk, Waiver of Liability and Indemnity. By acceptance of this permit, the applicants acknowledges and agrees (i) that the site may be subject to hazards from waves, erosion, storm conditions, liquefaction, flooding, and sea level rise; (ii) to assume the risks to the applicants and the property that is the subject of this permit of injury and damage from such hazards in connection with this permitted development; (iii) to unconditionally waive any claim of damage or liability against the Commission, its officers, agents, and employees for injury or damage from such hazards; and (iv) to indemnify and hold harmless the Commission, its officers, agents, and employees with respect to the Commission's approval of the project against any and all liability, claims, demands, damages, costs (including costs and fees incurred in defense of such claims), expenses, and amounts paid in settlement arising from any injury or damage due to such hazards.

2. No Future Shoreline Protective Device.

- A. By acceptance of this permit, the applicants agree, on behalf of themselves and all other successors and assigns, that no shoreline protective device(s) shall ever be constructed to protect the development approved pursuant to Coastal Development Permit No. 5-14-1840 including, but not limited to, the residence and garage, foundations, and any future improvements, in the event that the development is threatened with damage or destruction from waves, erosion, storm conditions, flooding, sea level rise or other natural coastal hazards in the future. By acceptance of this permit, the applicants hereby waive, on behalf themselves and all successors and assigns, any rights to construct such devices that may exist under Public Resources Code Section 30235.
- B. By acceptance of this Permit, the applicants further agree, on behalf of themselves and all successors and assigns, that the landowners shall remove the development authorized by this permit, including the concrete slab, if any government agency has ordered that the structure is not to be occupied due to any of the hazards identified above. In the event that portions of the development fall to the wetland before they are removed, the landowner shall remove all recoverable debris associated with the development from the wetland and lawfully dispose of the material in an approved disposal site. Such removal shall require a coastal development permit.

3. Storage of Construction Materials, Mechanized Equipment and Removal of Construction Debris. The permittees shall comply with the following construction-related requirements:

- A. No demolition or construction materials, debris, or waste shall be placed or stored where it may enter sensitive habitat, receiving waters or a storm drain, or be subject to wave, wind, rain, or tidal erosion and dispersion;

- B. No demolition or construction equipment, materials, or activity shall be placed in or occur in any location that would result in impacts to environmentally sensitive habitat areas, streams, wetlands or their buffers;
- C. Any and all debris resulting from demolition or construction activities shall be removed from the project site within 24 hours of completion of the project;
- D. Demolition or construction debris and sediment shall be removed from work areas each day that demolition or construction occurs to prevent the accumulation of sediment and other debris that may be discharged into coastal waters;
- E. All trash and debris shall be disposed in the proper trash and recycling receptacles at the end of every construction day;
- F. The applicants shall provide adequate disposal facilities for solid waste, including excess concrete, produced during demolition or construction;
- G. Debris shall be disposed of at a legal disposal site or recycled at a recycling facility. If the disposal site is located in the Coastal Zone, a coastal development permit or an amendment to this permit shall be required before disposal can take place unless the Executive Director determines that no amendment or new permit is legally required;
- H. All stock piles and construction materials shall be covered, enclosed on all sides, shall be located as far away as possible from drain inlets and any waterway, and shall not be stored in contact with the soil;
- I. Machinery and equipment shall be maintained and washed in confined areas specifically designed to control runoff. Thinners or solvents shall not be discharged into sanitary or storm sewer systems;
- J. The discharge of any hazardous materials into any receiving waters shall be prohibited;
- K. Spill prevention and control measures shall be implemented to ensure the proper handling and storage of petroleum products and other construction materials. Measures shall include a designated fueling and vehicle maintenance area with appropriate berms and protection to prevent any spillage of gasoline or related petroleum products or contact with runoff. The area shall be located as far away from the receiving waters and storm drain inlets as possible;
- L. Best Management Practices (BMPs) and Good Housekeeping Practices (GHPs) designed to prevent spillage and/or runoff of demolition or construction-related materials, and to contain sediment or contaminants associated with demolition or construction activity, shall be implemented prior to the on-set of such activity; and
- M. All BMPs shall be maintained in a functional condition throughout the duration of construction activity.

4. Conformance with Drainage and Run-Off Control Plan. The applicants shall conform with the drainage and run-off control plan dated November 20, 2014 showing roof top and surface drainage directed to trench drains. Any proposed changes to the approved plan shall be reported to the Executive Director. No changes to the approved plan shall occur without a Commission amendment to this coastal development permit unless the Executive Director determines that no amendment is legally required.

5. Landscaping-Drought Tolerant, Non-Invasive Plants. Vegetated landscaped areas shall only consist of native plants or non-native drought tolerant plants, which are non-invasive. No plant species

listed as problematic and/or invasive by the California Native Plant Society (<http://www.CNPS.org/>), the California Invasive Plant Council (formerly the California Exotic Pest Plant Council) (<http://www.cal-ipc.org/>), or as may be identified from time to time by the State of California shall be employed or allowed to naturalize or persist on the site. No plant species listed as a “noxious weed” by the State of California or the U.S. Federal Government shall be utilized within the property. All plants shall be low water use plants as identified by California Department of Water Resources (See: <http://www.water.ca.gov/wateruseefficiency/docs/wucols00.pdf>).

6. Future Development. This permit is only for the development described in Coastal Development Permit No. 5-14-1840. Pursuant to Title 14 California Code of Regulations Section 13250(b)(6), the exemptions otherwise provided in Public Resources Code Section 30610(a) shall not apply to the development governed by Coastal Development Permit No. 5-14-1840. Accordingly, any future improvements to the residence and patio authorized by this permit, including but not limited to repair and maintenance identified as requiring a permit in Public Resources Section 30610(d) and Title 14 California Code of Regulations Sections 13252(a)-(b), shall require an amendment to Permit No. 5-14-1840 from the Commission or shall require an additional coastal development permit from the Commission or from the applicable certified local government.

7. Deed Restriction. PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicants shall submit to the Executive Director for review and approval documentation demonstrating that the landowners have executed and recorded against the parcel(s) governed by this permit a deed restriction, in a form and content acceptable to the Executive Director: (1) indicating that, pursuant to this permit, the California Coastal Commission has authorized development on the subject property, subject to terms and conditions that restrict the use and enjoyment of that property; and (2) imposing the Special Conditions of this permit as covenants, conditions and restrictions on the use and enjoyment of the Property. The deed restriction shall include a legal description of the entire parcel or parcels governed by this permit. The deed restriction shall also indicate that, in the event of an extinguishment or termination of the deed restriction for any reason, the terms and conditions of this permit shall continue to restrict the use and enjoyment of the subject property so long as either this permit or the development it authorizes, or any part, modification, or amendment thereof, remains in existence on or with respect to the subject property.

IV. FINDINGS AND DECLARATIONS:

The Commission hereby finds and declares:

A. PROJECT LOCATION AND DESCRIPTION

The subject site is a beach front lot located at 3503 Seashore Drive within the City of Newport Beach, Orange County (**Exhibits No. 1-2**). Currently, an existing two (2) story duplex with an attached garage occupies the project site. The lot size is 2,336 square feet and the City of Newport Beach Coastal Land Use Plan (CLUP) designates the site Single-Unit Residential Detached and the proposed project adheres to this designation. The project is located within an existing urban residential area, located generally west of the Newport Pier.

There is a wide sandy beach, approximately 350-feet wide, between the subject property and the Pacific Ocean. Due to its oceanfront location, the project site may be potentially exposed to the hazard of waves, erosion, storm conditions, sea level rise or other natural hazards.

The applicants propose to demolish an existing two-story duplex with an attached garage and construct a new 2,985 square foot, three-story duplex with an attached 372 square foot two (2) garage and two (2) car carport on a beach fronting lot (**Exhibits No. 3-4**). Grading will consist of 34 cubic yards of fill. New 6-foot high side yard property line walls are proposed, as well as, a new 3-foot high front yard property line wall. Grading will consist of 34 cubic yards of fill.

The proposed project will not have an adverse effect on public access. The project site is located on the inland portion of Oceanfront, which consists of the City's paved public lateral access way (boardwalk). The Commission has found through previous permit actions in this area that the City's setback in this area is acceptable for maintaining public access. The proposed project is consistent with the City's 5-foot required setback from the seaward property line. Vertical public access to this beach is available approximately 25-feet east (downcoast) of the project site at the end of 35th Street. Lateral public access is available along the boardwalk and wide sandy beach seaward of the subject site (**Exhibit No. 2**).

The proposed development is located in an area where coastal hazards exist and can adversely impact the development. Therefore, the Commission imposes **Special Condition No. 1**, which requires the applicants to assume the risk of development. To minimize the project's potential future impact on shoreline processes, the Commission imposes **Special Condition No. 2**, which prohibits construction of any future shoreline protective device(s) to protect the development approved pursuant to Coastal Development Permit No. 5-14-1840 including, but not limited to residence and garage, foundations, and any other future improvements in the event that the development is threatened with damage or destruction from waves, erosion, storm conditions, flooding, sea level rise or other natural coastal hazards in the future.

Since coastal processes are dynamic and structural development may alter the natural environment, future development adjacent to the beach could adversely affect future shoreline conditions if not

properly evaluated and potentially may result in a development which is not consistent with the Chapter 3 policies of the Coastal Act. In order to ensure that development on the site does not occur which could potentially result in adverse impacts to coastal processes, the Commission imposes **Special Condition No. 6**, which informs the applicants that future development at the site requires an amendment to Coastal Development Permit No. 5-14-1840 or a new coastal development permit.

The proposed project is considered development and there is an opportunity to improve water quality. To minimize erosion and prevent debris from being dispersed down the storm drain system leading to the ocean during construction, the Commission imposes **Special Condition No. 3**, which provides construction-related requirements to provide for the safe storage of construction materials and the safe disposal of construction debris. To minimize any impacts to water quality the proposed project may have after construction, the applicants are proposing water quality improvements as part of the proposed project, consisting of rooftop and surface drainage directed to trench drains consistent with past Commission action. In order to ensure that the drainage and runoff control plan is adhered to, the Commission imposes **Special Condition No. 4**, which requires the applicants to conform with the drainage and runoff control plan and to adequately maintain it throughout the life of the proposed development. The applicants have also stated that they shall also comply with the applicable water efficiency and conservation measures of the City's adopted CALGreen standards concerning irrigation systems, and efficient fixtures and appliances

Currently, no landscaping is being proposed. If it were proposed in the future, the placement of any vegetation that is considered to be invasive which could supplant native vegetation should not be allowed. Invasive plants have the potential to overcome native plants and spread quickly. Invasive plants are generally those identified by the California Invasive Plant Council (<http://www.cal-ipc.org/>) and California Native Plant Society (www.CNPS.org) in their publications. Furthermore, any plants in the landscape plan should only be drought tolerant to minimize the use of water (and preferably native to coastal Orange County). The term drought tolerant is equivalent to the terms 'low water use' and 'ultra low water use' as defined and used by "A Guide to Estimating Irrigation Water Needs of Landscape Plantings in California" prepared by University of California Cooperative Extension and the California Department of Water Resources dated August 2000 available at <http://www.water.ca.gov/wateruseefficiency/docs/wucols00.pdf>). Therefore in order to minimize the use of water and the spread of invasive vegetation, the Commission imposes **Special Condition No. 5**, which imposes landscape controls that require that all vegetated landscaped areas shall only consist of native plants or non-native drought tolerant plants, which are non-invasive.

Due to the oceanfront location of the proposed development and frequent bird activity in the area, there is a substantial risk of bird strikes. Clear glass walls are known to have adverse impacts upon a variety of bird species. Birds are known to strike glass walls causing their death or stunning them which exposes them to predation. Birds strike the glass because they either don't see the glass, or there is some type of reflection in the glass which attracts them (such as the reflection of bushes or trees that the bird might use for habitat.). The applicants have proposed to address this issue by using Ornilux or similar bird safe glass along the new ocean-facing decks.

To ensure that any prospective future owners of the property are made aware of the applicability of the conditions of this permit, the Commission imposes **Special Condition No. 7**, which requires the

property owner record a deed restriction against the property, referencing all of the above special conditions of this permit and imposing them as covenants, conditions and restrictions on the use and enjoyment of the Property.

Section 30600(c) of the Coastal Act provides for the issuance of coastal development permits directly by the Commission in regions where the local government having jurisdiction does not have a certified Local Coastal Program (CLP). The City of Newport Beach only has a certified Coastal Land Use Plan (CLUP) and has not exercised the options provided in 30600(b) or 30600.5 to issue its own permits. Therefore, the Coastal Commission is the permit issuing entity and the standard of review is Chapter 3 of the Coastal Act. The certified Coastal Land Use Plan may be used for guidance.

B. HAZARDS

Development adjacent to the ocean is inherently hazardous. Development which may require a protective device in the future cannot be allowed due to the adverse impacts such devices have upon, among other things, public access, visual resources and shoreline processes. To minimize the project's impact on shoreline processes, and to minimize risks to life and property, the development has been conditioned to: require an appropriate set-back from the water; require a drainage and run-off control plan to direct, treat, and minimize the flow of water offsite; prohibit construction of protective devices (such as a seawall) in the future; and to require that the landowner and any successor-in-interest assume the risk of undertaking the development. As conditioned, the Commission finds that the development conforms to the requirements of Sections 30235 and 30253 of the Coastal Act regarding the siting of development in hazardous locations.

C. DEVELOPMENT

The development is located within an existing developed area and is compatible with the character and scale of the surrounding area. However, the proposed project raises concerns that future development of the project site potentially may result in a development which is not consistent with the Chapter 3 policies of the Coastal Act. To assure that future development is consistent with the Chapter 3 policies of the Coastal Act, the Commission finds that a future improvements special condition be imposed. As conditioned the development conforms with the Chapter 3 policies of the Coastal Act.

D. PUBLIC ACCESS

The proposed development will not affect the public's ability to gain access to, and/or to use the coast and nearby recreational facilities. Therefore, as proposed the development, as conditioned, conforms with Sections 30210 through 30214, Sections 30220 through 30224, and 30252 of the Coastal Act.

E. WATER QUALITY

The proposed development has a potential for a discharge of polluted run-off from the project site into coastal waters. The development, as proposed and as conditioned, incorporates design features to minimize the effect of construction and post-construction activities on the marine environment. These design features include, but are not limited to, the appropriate management of equipment and

construction materials, reducing run-off through the use of permeable surfaces, the use of non-invasive drought tolerant vegetation to reduce and treat the run-off discharged from the site, and for the use of post-construction best management practices to minimize the project's adverse impact on coastal waters. Therefore, the Commission finds that the proposed development, as conditioned, conforms with Sections 30230 and 30231 of the Coastal Act regarding the protection of water quality to promote the biological productivity of coastal waters and to protect human health.

F. DEED RESTRICTION

To ensure that any prospective future owners of the property are made aware of the applicability of the conditions of this permit, the Commission imposes one additional condition requiring that the property owner record a deed restriction against the property, referencing all of the above Special Conditions of this permit and imposing them as covenants, conditions and restrictions on the use and enjoyment of the Property. Thus, as conditioned, any prospective future owner will receive actual notice of the restrictions and/or obligations imposed on the use and enjoyment of the land including the risks of the development and/or hazards to which the site is subject, and the Commission's immunity from liability.

G. LOCAL COASTAL PROGRAM (LCP)

The LUP for the City of Newport Beach was effectively certified on May 19, 1982. The certified LUP was updated on October 8, 2009. As conditioned, the proposed development is consistent with Chapter 3 of the Coastal Act and with the certified Coastal Land Use Plan for the area. Approval of the project, as conditioned, will not prejudice the ability of the local government to prepare a Local Coastal Program that is in conformity with the provisions of Chapter 3.

H. California Environmental Quality Act (CEQA)

The City of Newport Beach is the lead agency responsible for certifying that the proposed project is in conformance with the California Environmental Quality Act (CEQA). The City determined that in accordance with CEQA, the project is ministerial or categorically exempt. Section 13096(a) of the Commission's administrative regulations requires Commission approval of coastal development permit applications to be supported by a finding showing the application, as conditioned by any conditions of approval, to be consistent with any applicable requirements of the California Environmental Quality Act (CEQA).

Although the proposed development is categorically exempt from CEQA, the Commission has imposed conditions to ensure conformity with Coastal Act requirements. As conditioned, there are no feasible alternatives or additional feasible mitigation measures available that would substantially lessen any significant adverse effect that the activity may have on the environment. Therefore, the Commission finds that the proposed project, as conditioned to mitigate the identified impacts, is the least environmentally damaging feasible alternative and consistent with the requirements of the Coastal Act and CEQA.

APPENDIX A

SUBSTANTIVE FILE DOCUMENTS: Approval-In-Concept from the City of Newport Beach Planning Department dated November 21, 2014; *Coastal Hazard and Wave Runup Study, 3503 Seashore Drive, Newport Beach, California* prepared by *Geosoils, Inc.* dated October 9, 2014; Letter from Commission staff to agent dated December 23, 2014; Letter from agent to Commission staff dated January 20, 2013; and Letter from agent to Commission staff received February 26, 2015.



- SEE E2
- 1 SPINAKER RUN
 - 2 BROADSIDE LN
 - 3 BAYVIEW DR
 - 4 CLIPPER CT
 - 5 BENTLEY RUN
- SEE E2
- 1 AGATE LN
 - 2 BAYVIEW DR
 - 3 BAY OREST CTR
 - 4 CHARLENE LN
 - 5 BAYVIEW DR
 - 6 SEASIDE DR
 - 7 SEASPRITE CTR

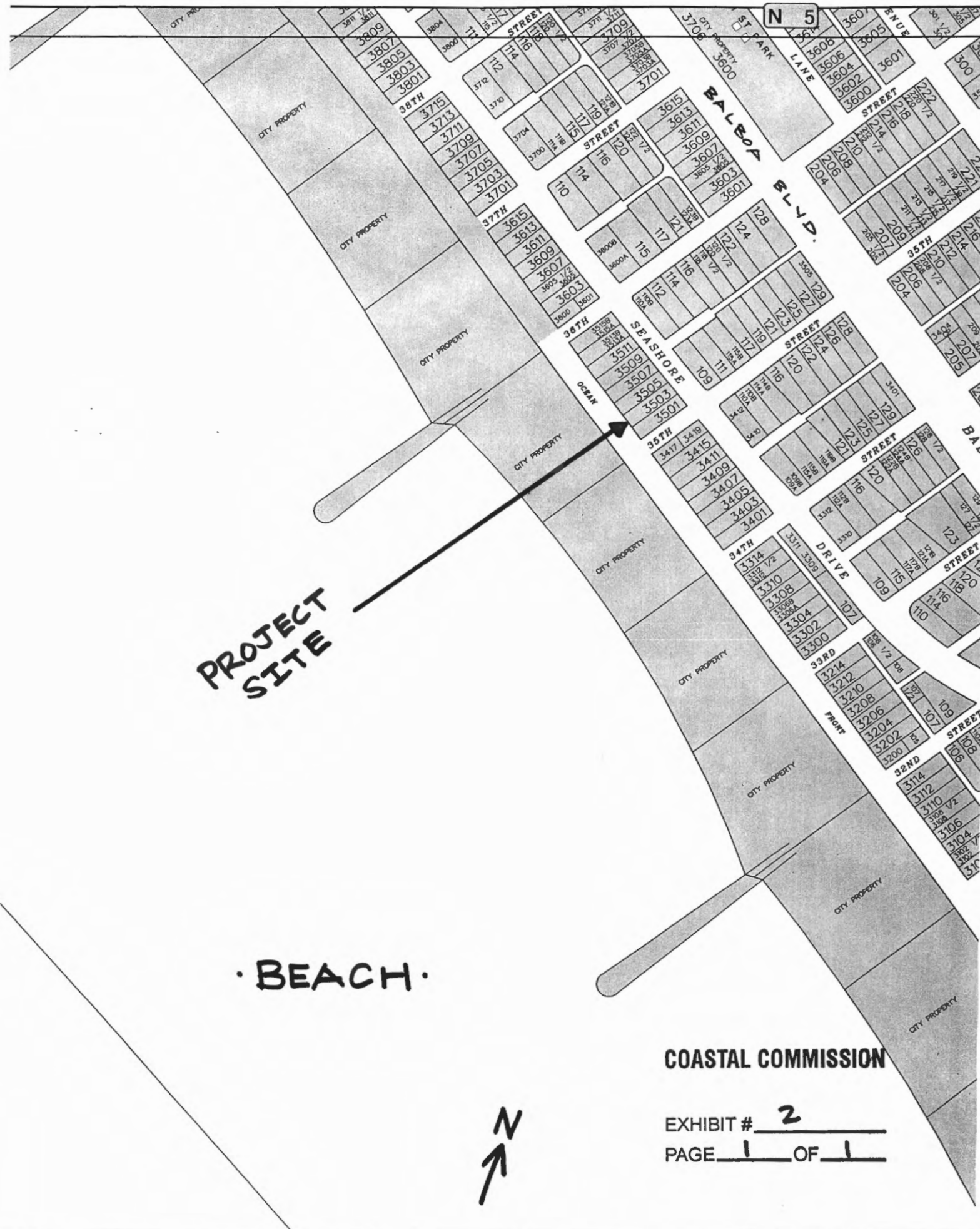
PROJECT SITE

OCEAN

PACIFIC

COASTAL COMMISSION

EXHIBIT # 1
PAGE 1 OF 1



PROJECT SITE

BEACH

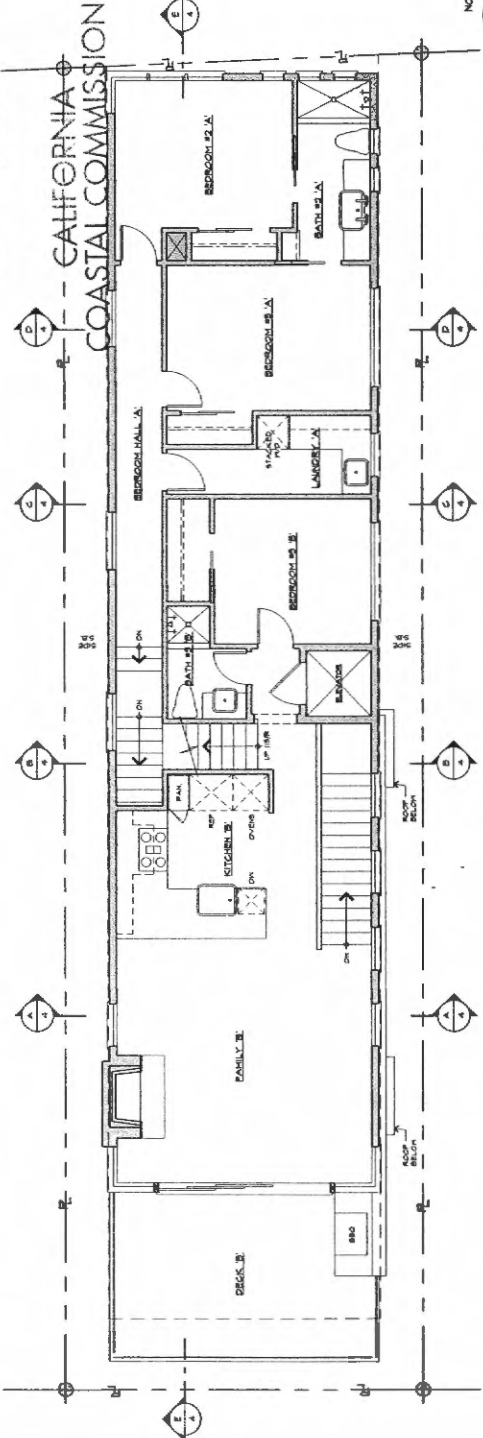
COASTAL COMMISSION

EXHIBIT # 2
PAGE 1 OF 1

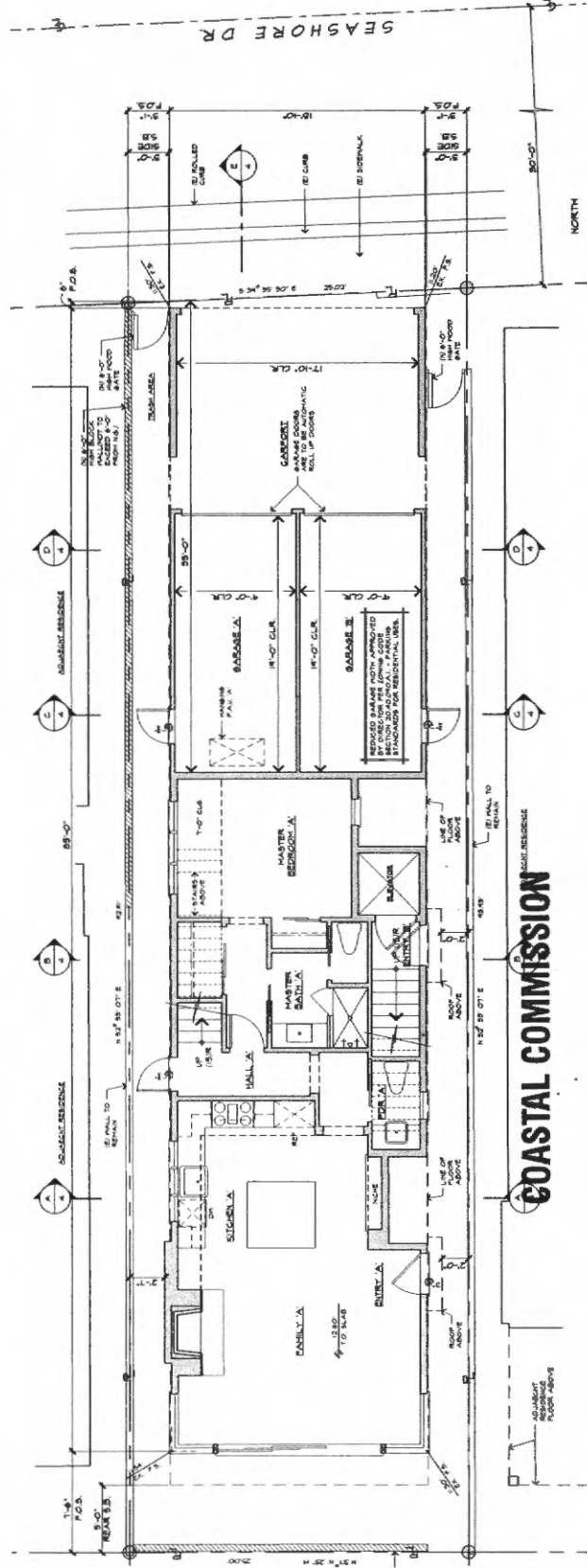


5 - 141840

NOV 25 2014



SECOND FLOOR PLAN
SCALE: 1/4" = 1'-0"



SITE & FIRST FLOOR PLAN
SCALE: 1/4" = 1'-0"

LEGAL DESCRIPTION
LOT 2, BLOCK 98, MAP OF BIRNPORT BEACH

MAX ALLOWABLE AREA CALCULATIONS
LOT AREA: 1080' x 2' = 2160 SF
BUILDING LOT AREA: 1080' x 2' = 2160 SF
MAX SQUARE FOOTAGE ALLOWABLE: 7,880 SF

BUILDING AREA CALCULATIONS
NET GROSS FLOOR AREA: 485 SQ. FT.
NET GROSS FLOOR AREA: 485 SQ. FT.
NET GROSS FLOOR AREA: 485 SQ. FT.
NET GROSS FLOOR AREA: 485 SQ. FT.
TOTAL GROSS FLOOR AREA: 1,940 SQ. FT.
TOTAL BUILDING AREA: 1,940 SQ. FT.

AVERAGE NATURAL GRADE
1.20'
1.20'
1.20'
1.20'
1.20' = 7.58' + 7.58' + 7.58' + 7.58' + 7.58' = 37.70'

CITY NOTES:
1. THE CITY ENGINEER HAS REVIEWED THIS PLAN SET PRIOR TO THE ISSUANCE OF A BUILDING PERMIT. THIS REVIEW IS LIMITED TO THE TECHNICAL ASPECTS OF THE PLAN SET AND DOES NOT CONSTITUTE AN ENDORSEMENT OR A GUARANTEE OF THE ACCURACY OF THE INFORMATION PROVIDED. THE CITY ENGINEER'S REVIEW IS LIMITED TO THE TECHNICAL ASPECTS OF THE PLAN SET AND DOES NOT CONSTITUTE AN ENDORSEMENT OR A GUARANTEE OF THE ACCURACY OF THE INFORMATION PROVIDED. THE CITY ENGINEER'S REVIEW IS LIMITED TO THE TECHNICAL ASPECTS OF THE PLAN SET AND DOES NOT CONSTITUTE AN ENDORSEMENT OR A GUARANTEE OF THE ACCURACY OF THE INFORMATION PROVIDED.

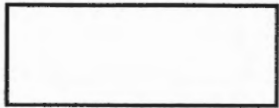
A New Duplex for:
Diane S. Janet Brown
3505 Seaford Dr., Newport Beach, CA 92660
(949) 887-6515

DATE: 11-12-2014

1

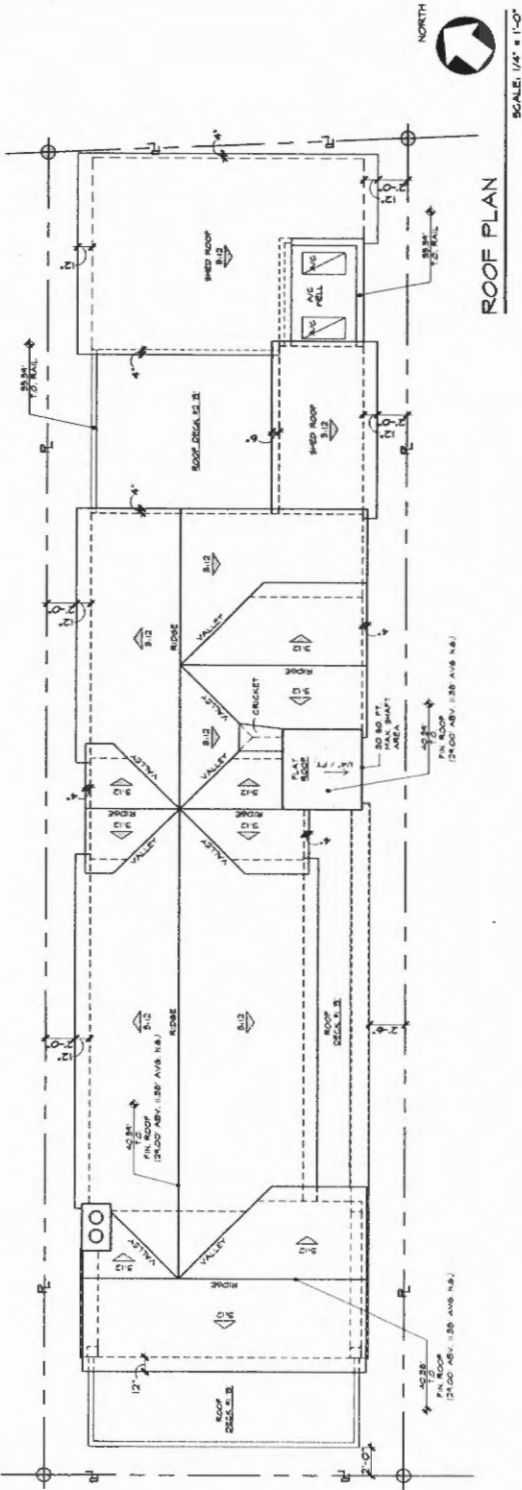


A New Duplex for:
 Duane & Janet Brown
 2505 Siskiyout Dr., Newport Beach, CA 92663
 (949) 877-8515



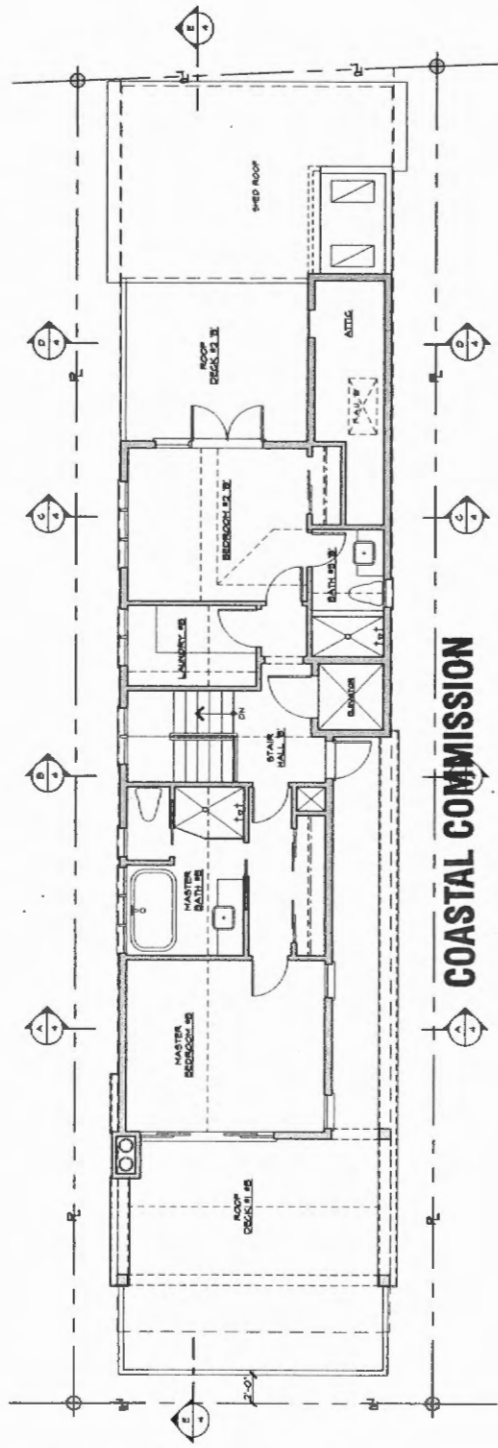
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ROOF PLAN

SCALE: 1/4" = 1'-0"

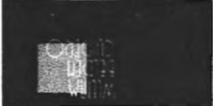


THIRD FLOOR PLAN

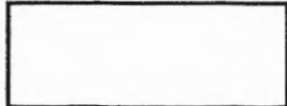
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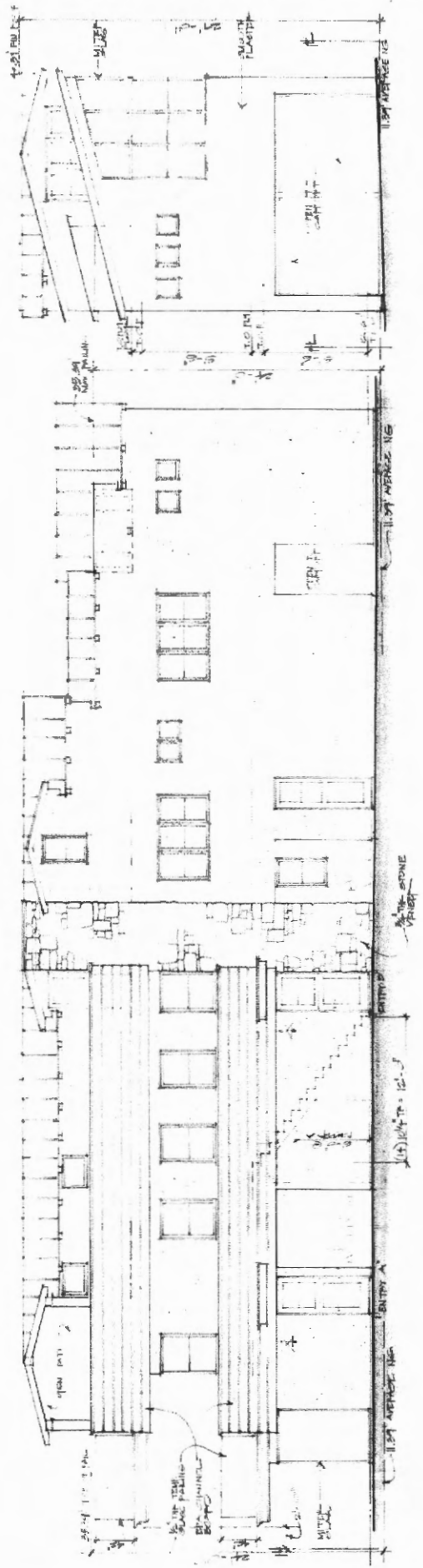
COASTAL COMMISSION
 EXHIBIT # 3
 PAGE 2 OF 2



3505 SEASIDE DR., Newport Beach, CA 92663 (949) 877-6515
 A New Home for:
 Duane S Janet Brown



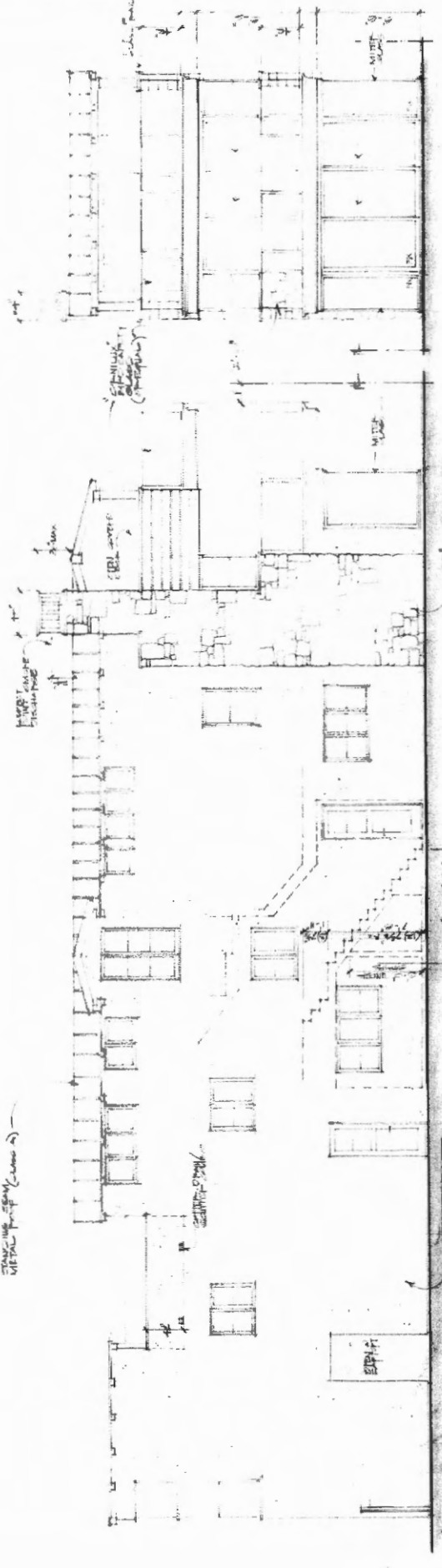
1/4/14
 11/20/14



SOUTH (ENTRY SIDE)

1/4" = 1'-0"

EAST (SEA-SIDE) 1/4" = 1'-0"



COASTAL COMMISSION

WEST 1/4" = 1'-0"

NORTH

EXHIBIT # 4
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