

CALIFORNIA COASTAL COMMISSION

SOUTH COAST AREA

245 W. BROADWAY, STE. 380

P.O. BOX 1450

LONG BEACH, CA 90802-4416

(310) 590-5071

Filed: 11/1/96
49th Day: 12/20/96
180th Day: 4/30/97
Staff: CP-LB
Staff Report: 11/6/96
Hearing Date: Dec. 10-13, 1996
Commission Action:

STAFF REPORT: CONSENT

APPLICATION NO.: 5-96-224

APPLICANT: Jeffrey Lee

AGENT: N/A

PROJECT LOCATION: 119 Union Jack Mall (Lot 6, Block 13, Del Rey Beach Tract), Venice, City of Los Angeles, Los Angeles County.

PROJECT DESCRIPTION: Construction of a three-story, 42 foot high, 5,024 square foot single family residence with an attached three-car garage on a vacant lot. The applicant also proposes to improve the portion of the Union Jack Mall right-of-way which fronts the site.

Lot Area	4,167 sq. ft.
Building Coverage	2,545 sq. ft.
Pavement Coverage	580 sq. ft.
Landscape Coverage	1,042 sq. ft.
Parking Spaces	3
Zoning	R1-1
Plan Designation	Single Family Residential
Ht abv fin grade	42 feet

SUMMARY OF STAFF RECOMMENDATION:

The proposed single family residence is located on a block on which a public right-of-way has not yet been improved as required by an underlying permit. Staff is recommending that the Commission allow the applicant to develop the lot prior to improvement of the public right-of-way in its entirety by granting a Coastal Development Permit for the proposed development with special conditions relating to public improvements, maintenance of public areas, underlying permit requirements, and the provision of adequate parking. The applicant has proposed to improve the portion of the Union Jack Mall right-of-way which fronts the site and agrees with the recommendation.

LOCAL APPROVAL RECEIVED:

1. City of Los Angeles Approval in Concept #96-043, 10/16/96.

SUBSTANTIVE FILE DOCUMENTS:

1. Coastal Development Permit A-266-77 (ILA) & amendment.
2. Coastal Development Permit Amendment 5-91-686-A (Hoffman/Mulvihill).
3. Coastal Development Permit 5-89-815 (Weinberg).
4. Coastal Development Permit 5-95-207 (Croutch).
5. Coastal Development Permit 5-87-112 (Del Rey Assoc.) & amendment.
6. Coastal Development Permit application 5-96-223 (Lee).

STAFF RECOMMENDATION:

The staff recommends that the Commission adopt the following resolution:

I. Approval with Conditions

The Commission hereby grants, subject to the conditions below, a permit for the proposed development on the grounds that the development, as conditioned, will be in conformity with the provisions of Chapter 3 of the California Coastal Act of 1976, 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 of the Coastal Act, and will not have any significant adverse impacts on the environment within the meaning of the California Environmental Quality Act.

II. 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 this permit is reported to the Commission. 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. Compliance. All development must occur in strict compliance with the proposal as set forth in the application for permit, subject to any special conditions set forth below. Any deviation from the approved plans must be reviewed and approved by the staff and may require Commission approval.

4. Interpretation. Any questions of intent or interpretation of any condition will be resolved by the Executive Director or the Commission.
5. Inspections. The Commission staff shall be allowed to inspect the site and the project during its development, subject to 24-hour advance notice.
6. 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.
7. 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. Public Improvements

Prior to occupancy of the approved residence, the applicant shall complete the public improvements proposed for the portion of the Union Jack Mall right-of-way which fronts the site as approved on the final plans (Exhibit #3). All construction shall be compatible with the utilities and plans approved under Coastal Development Permit A-266-77 (ILA). The applicant is responsible for obtaining the required final approvals from the City of Los Angeles for all work in the public right-of-way.

2. Maintenance of Public Areas

Prior to authorization of permit, the applicant shall record free of prior liens and encumbrances except for tax liens, a deed restriction in a form and content approved by the Executive Director, binding the applicant and his successors in interest to participate with the lot owners of the Silver Strand on a fair and equitable basis in the maintenance of the public areas, buffers and drainage devices prescribed by Coastal Permit A-266-77. The public areas shall be identified in the deed restriction. The deed restriction shall run with the land.

3. Coastal Development Permit A-266-77 (ILA)

Through the acceptance of this Coastal Development Permit, the applicant acknowledges that the subject site is subject to Coastal Development Permit A-266-77 (ILA) and that all development on the site and within the affected portions of the Silver Strand and Del Rey Beach subdivisions must be consistent with Coastal Development Permit A-266-77 (ILA). All public areas provided and improved pursuant to Coastal Development Permit A-266-77 (ILA), including Union Jack Mall and the other landscaped pedestrian malls, the public streets and alleys, all public parking spaces, and the Ballona Lagoon public access path, shall remain open and

available for use by the general public on the same basis as similar public areas within the City. Public parking areas shall not be used for preferential parking.

4. On-site Parking

Prior to authorization of permit, the applicant shall record free of prior liens and encumbrances except for tax liens, a deed restriction in a form and content approved by the Executive Director, assuring the provision of three off-street parking spaces on the project site. These parking spaces shall take access from Via Donte. The deed restriction shall run with the land, binding on all heirs and assigns of the applicants.

IV. Findings and Declarations

The Commission hereby finds and declares:

A. Project Description

The applicant proposes to construct a three-story, 42 foot high, 5,024 square foot single family residence on a vacant lot in the interior of the Del Rey Beach tract in Venice (See Exhibits). The proposed residence contains a three-car garage with vehicular access to Via Donte (Exhibit #4).

The applicant also proposes to improve the portion of the Union Jack Mall right-of-way which fronts the site (Exhibit #3). Union Jack Mall is an unimproved public right-of-way which is required to be developed as a landscaped pedestrian mall under Coastal Development Permit A-266-77 (ILA).

The site and Union Jack Mall are located in the Del Rey Beach tract. The Silver Strand subdivision is located just north of Via Donte. Ballona Lagoon is located about three hundred feet west of the subject site (Exhibit #2). The entire area is referred to as the "Silver Strand area".

B. Project Background

The Silver Strand subdivision and the Del Rey Beach tract share a long history before the Coastal Commission. Both subdivisions, referred to together as the Silver Strand area, are located along the east bank of Ballona Lagoon and have only recently been developed with single family residences. Although the subdivisions were created in the early 1900's, the development of the area did not occur until the late 1970's. Therefore, the Commission has reviewed and permitted the development of the subdivisions with single family residences.

The first Commission approval in the area occurred in 1977 when the Commission approved the "Silver Strand Permit", A-266-77 (ILA), which was brought before the Commission on an appeal. Prior to the Commission's action on Coastal

Development Permit A-266-77 (ILA) in 1977, the Commission and its predecessor denied several applications to improve the streets and supply utilities within portions of the Silver Strand subdivision and the Del Rey Beach tract to make residential development possible. The previous projects were denied because of adverse impacts on traffic, recreation, and wetland habitat.

The Commission's 1977 approval of Coastal Development Permit A-266-77 (ILA) permitted the applicants, the Isthmus Landowners Association (ILA), to develop the infrastructure necessary for the development of single family homes on approximately three hundred lots located on Blocks 7 through 18 of the Silver Strand subdivision and Blocks 13 through 15 of the Del Rey Beach Tract (Exhibit #2). The currently proposed project is located on a lot (Lot 6, Block 13, Del Rey Beach Tract) which is subject to Coastal Development Permit A-266-77 (ILA) (Exhibit #2).

Coastal Development Permit A-266-77 (ILA) was subject to conditions addressing lagoon protection, maintenance of public areas, public access, and public parking. In its approval of Coastal Development Permit A-266-77 (ILA), the Commission found that Ballona Lagoon, located adjacent to the Silver Strand and Del Rey Beach subdivisions and about three hundred feet west of the subject site, was critical habitat area and an important coastal resource. The Commission further found that residential development of the Silver Strand area would have major adverse cumulative impacts on the lagoon and that several measures were necessary to mitigate the adverse impacts of development. One of the mitigation measures was the requirement for the lagoon fronting lot owners to dedicate an easement for a habitat protection and public access as part of a lagoon buffer to reduce the impacts of the residential development on the lagoon. The protective lagoon buffer area was to be restored according to the Ballona Lagoon Preserve Plan in order to improve the degraded habitat area. Another mitigation measure was a condition of Coastal Development Permit A-266-77 (ILA) which required the lot owners who benefited from Coastal Development Permit A-266-77 (ILA) to establish a private homeowners association sufficient to maintain all public areas and landscaping approved and required by the permit.

Coastal Development Permit A-266-77 (ILA) was amended in 1979. The amended permit still allowed the ILA to develop the infrastructure necessary for the development of approximately three hundred lots with single family homes. As amended, Coastal Development Permit A-266-77 (ILA) required the permittee (ILA) to perform all grading in a single contract, to improve a public access path on the east bank of the lagoon, restore the lagoon buffer, to improve the streets for public access and parking, and to establish a private homeowners association sufficient to maintain all public areas and landscaping including the lagoon buffer.

Since 1980, the approved grading has been completed, the public access path has been improved, and the permittee (ILA) has established the private homeowners association of the Isthmus Landowners Association (ILA) to maintain the lagoon buffer and other public areas. However, the ILA has not yet completed the required improvement of Union Jack Mall, Voyage Mall, Westwind Court, and Voyage Court.

The amendment also required that the lot owners who benefited from Coastal Development Permit A-266-77 (ILA) contribute equally for the restoration and maintenance of the lagoon buffer. The lagoon buffer was landscaped in an effort to restore the habitat in the mid-1980's, but that effort was not successful.

The conditions of approval for Coastal Development Permit A-266-77 (ILA) provided the basis for the mitigating special conditions which have been routinely applied to all subsequent Coastal Development Permits in the area. This set of special conditions ensure that the Chapter 3 policies of the Coastal Act and the intent of Coastal Development Permit A-266-77 (ILA) is carried out as individual lots are developed. This application is required to meet the special conditions of approval necessary to ensure consistency with the Chapter 3 policies of the Coastal Act and Coastal Development Permit A-266-77 (ILA).

The Commission has also approved permits for the development of the northern portion of the Del Rey Beach tract which was not subject to Coastal Development Permit A-266-77 (ILA). Coastal Development Permit 5-86-641 (Lee) allowed the development of ten single family residences on ten lots situated along the east bank of Ballona Lagoon (Exhibit #2). That Commission approval included provisions for the restoration and maintenance of the lagoon buffer areas adjoining the subject lots. The lagoon buffer adjoining the ten lots subject to Coastal Development Permit 5-86-641 (Lee) has been successfully improved with a continuation of the east bank public access path and restored with native coastal strand vegetation.

Coastal Development Permit 5-86-641 (Lee) also required the permittee (Lee) to join with the private homeowners association established under Coastal Development Permit A-266-77 (ILA) to participate in the maintenance responsibilities of the public areas and landscaping (including malls, parking nodes, lagoon buffer and path) approved and required by the Coastal Development Permit A-266-77 (ILA).

In 1987, the Commission approved Coastal Development Permit 5-87-112 (Del Rey Assoc.) for the development of streets, utilities, and 36 lots with single family residences on a southern portion of the Del Rey Beach tract located near the lagoon, but not adjoining it (Exhibit #2). In its approval, the Commission found that residential development of this portion of the Del Rey Beach tract would have cumulative adverse impacts on the lagoon and mitigation measures were necessary to mitigate those cumulative adverse impacts of development.

One of the mitigation measures was a condition which required the permittee (Del Rey Assoc.) and all members of the Del Rey Association to join with the private homeowners association established under Coastal Development Permit A-266-77 (ILA) to participate equally in the maintenance of the public areas and landscaping (including malls, parking nodes, lagoon buffer and path) approved and required by the Coastal Development Permits A-266-77 (ILA), 5-86-641 (Lee), and 5-87-112 (Del Rey Assoc.).

C. Public Improvements

As previously stated, Coastal Development Permit A-266-77 (ILA) permitted the construction of the infrastructure necessary for the development of approximately three hundred individual lots with single family homes (Exhibit #2). The permitted infrastructure included the public streets, alleys (courts), landscaped public malls, underground utilities, and drainage devices.

In approving Coastal Development Permit A-266-77 (ILA), the Commission found that the adverse impacts on public access and recreation caused by the residential development of the Silver Strand area would be partially offset by the improvement of the public rights-of-way for parking and pedestrian access.

Most of the infrastructure improvements permitted and required by Coastal Development Permit A-266-77 (ILA) have been constructed by the ILA consistent with the requirements of the permit. However, the ILA has not yet completed the required improvements on the following public rights-of-way: Union Jack Mall, Voyage Mall, Westwind Court, and Voyage Court. The proposed project is situated on the unimproved right-of-way of Union Jack Mall (Exhibit #3). The ILA did install the underground utilities serving the site.

As previously stated, the proposed single family residence is located on a public right-of-way which has not yet been improved as required by Coastal Development Permit A-266-77 (ILA). This raises the issue of whether the applicant should be required to wait until the entire Union Jack Mall public right-of-way is improved for public access before constructing the proposed residence, or whether the applicant can develop the lot prior to improvement of the public right-of-way in its entirety.

If the Commission requires that the public right-of-way be improved in its entirety before the residence is constructed, the applicant would be prevented from developing the subject lot for an extended period of time. The applicant would have to wait until the ILA has improved the remaining unimproved rights-of-way which are subject to Coastal Development Permit A-266-77 (ILA). The option of organizing the owners of the other 48 lots which front unimproved rights-of-way into a group to finance the necessary public improvements would also delay development of the individual lots for an extended period of time.

In any case, the applicant is unwilling to accept the ILA's burden of improving the entire length of the Union Jack Mall right-of-way. However, the applicant has proposed to landscape the width of Union Jack Mall where it fronts the site (Exhibit #3). This proposal, if applied to all the undeveloped lots in the area, would ultimately lead to the improvement of the unimproved public rights-of-way while allowing individual lots to be improved with single family residences without being held up while waiting for the ILA to make the required improvements. The alternative is to hold up development of single family residences until the ILA or some other entity improves all of the unimproved public rights-of-way in their entirety.

On similar proposals in 1994 and 1995, the Commission granted approvals for the construction of single family residences on nearby lots before all of the public rights-of-way on the block were improved [see Coastal Development

Permits 5-91-686 (Hoffman/Mulvihill) & 5-95-207 (Croutch)]. The applicants were, however, required to improve the alleys up to their property for vehicular access, and the malls which front their lots for public access.

The applicant's proposal is consistent with the prior Commission actions and will provide for the improvement of the public rights-of-way if applied to all subsequent permit applications. Even though the ILA is responsible under Coastal Development Permit A-266-77 (ILA) for the improvement of all the public rights-of-way, its inaction will no longer delay private lot owners from developing their properties. The public will eventually benefit through the improvement of Voyage Mall and Union Jack Mall as landscaped public malls for public access.

Therefore, the Commission finds that the proposed project, including the proposed improvement of a portion of the public right-of-way, is consistent with the public access and all other Chapter 3 policies of the Coastal Act. However, in order to ensure that the project is completed as proposed, a condition of approval is applied to the permit to require that prior to occupancy of the approved residence, the applicant shall complete the public improvements proposed for the portion of the Union Jack Mall right-of-way which fronts the site as approved on the final plans (Exhibit #3). All construction shall be compatible with the utilities and plans approved under Coastal Development Permit A-266-77 (ILA). In addition, the applicant is responsible for obtaining the required final approvals from the City of Los Angeles for all work in the public right-of-way. Finally, the applicant shall agree that Union Jack Mall and the other landscaped pedestrian malls, the public streets and alleys, all public parking spaces, and the Ballona Lagoon public access path, shall remain open and available for use by the general public on the same basis as similar public areas within the City. As conditioned, the proposed development is consistent the Chapter 3 policies of the Coastal Act.

D. Maintenance of Public Areas

When the Commission approved Coastal Development Permit A-266-77 (ILA) in 1977 and amended it in 1979, it found that the residential development of the Silver Strand area would have major cumulative impacts on Ballona Lagoon and that several measures were necessary to mitigate the adverse impacts of development. The mitigation measures included a requirement for the ongoing maintenance of the Silver Strand and Del Rey Beach public areas including the protective lagoon buffer, the public pedestrian malls, public parking spaces, the public access path along the lagoon, and the area's drainage devices. The Commission found that the ongoing maintenance of these public areas was necessary to mitigate the cumulative adverse impacts of the development of the Silver Strand area as a residential area.

Therefore, the Commission required the applicant (ILA) to, among other things, establish a homeowners association to maintain the public areas. The Isthmus Landowners Association (ILA) named themselves as the homeowners association which would maintain the public areas as required. As applicant, the ILA has the responsibility for the ongoing maintenance of the public areas because it

is the property owners comprising the ILA who benefit most from the development of the area as a residential area.

After the Commission's approval of the amendment to Coastal Development Permit A-266-77 (ILA) in 1979, the Commission began conditioning all individual Coastal Development Permits for single family residences in the Silver Strand area to require a deed restriction stating that each applicant is required to participate with the other lot owners in the maintenance of the public areas. The purpose of the condition is to ensure that all lot owners who benefit from development of their property participate in the mitigation of the cumulative impacts of the development of the area.

As required on the previous Commission approvals in the area, the applicant is required to record a deed restriction stating that he will participate with the lot owners of the Silver Strand on a fair and equitable basis in the maintenance of the public areas, buffers and drainage devices prescribed by Coastal Development Permit A-266-77 (ILA).

The applicants are also required to acknowledge that the public areas provided and improved pursuant to Coastal Development Permit A-266-77 (ILA) shall remain open and available for use by the general public on the same basis as similar public areas within the City. This requirement is contained in special condition three which has been updated to reflect the completion of the landscaped public malls and the provision of public parking areas within the Silver Strand area. In previous Silver Strand area permits, special condition three had addressed the construction of the landscaped public malls and the provision of public parking areas within the Silver Strand area.

Recordation of the required deed restriction will ensure that the applicant meets his obligation to participate in the mitigation of the cumulative impacts which the development of the Silver Strand area, including the subject lot, has had on the coastal resources in the area as identified in Coastal Development Permit A-266-77 (ILA). Only as conditioned is the proposed development consistent with the Chapter 3 policies of the Coastal Act and Coastal Development Permit A-266-77 (ILA).

E. Public Access and Parking

The Commission has consistently found that a direct relationship exists between residential density, the provision of adequate parking, and the availability of public access to the coast. Section 30252 requires that new development should maintain and enhance public access to the coast by providing adequate parking facilities.

Section 30252 of the Coastal Act states, in part:

The location and amount of new development should maintain and enhance public access to the coast by... (4) providing adequate parking facilities....

The Commission has consistently required that single family residences in the

Silver Strand area provide three on-site parking spaces in order to meet the parking demands of the development and comply with Section 30252 of the Coastal Act. The proposed project provides the required three on-site parking spaces in a three-car garage located on the ground floor (Exhibit #4). In addition, as required on the previous Commission approvals in the area, the applicant is required to record a deed restriction stating that he will provide three on-site parking spaces. Only as conditioned is the proposed project consistent with the public access policies of the Coastal Act.

In addition, when the Commission approved Coastal Development Permit A-266-77 (ILA), it found that the adverse impacts on public access and recreation caused by the residential development of the Silver Strand area would be offset with the provision of a public access path along the east bank of Ballona Lagoon and with the improvement of the public rights-of-way for parking and pedestrian access. Therefore, in order to ensure that the public access improvements required by Coastal Development Permit A-266-77 (ILA) are protected for public use, the Commission requires as a condition of approval that the applicant acknowledge that the public areas provided and improved pursuant to Coastal Development Permit A-266-77 (ILA), including Union Jack Mall and the other landscaped pedestrian malls, the public streets and alleys, all public parking spaces, and the Ballona Lagoon public access path, shall remain open and available for use by the general public on the same basis as similar public areas within the City. The public parking areas located at the street and mall ends shall not be used for preferential parking. Only as conditioned is the proposed project consistent with the public access policies of the Coastal Act.

F. Local Coastal Program

Section 30604(a) of the Coastal Act provides that the Commission shall issue a Coastal Development Permit only if the project will not prejudice the ability of the local government having jurisdiction to prepare a Local Coastal Program which conforms with Chapter 3 policies of the Coastal Act:

- (a) Prior to certification of the Local Coastal Program, a Coastal Development Permit shall be issued if the issuing agency, or the commission on appeal, finds that the proposed development is in conformity with the provisions of Chapter 3 (commencing with Section 30200) of this division and that the permitted development 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 (commencing with Section 30200). A denial of a Coastal Development Permit on grounds it would prejudice the ability of the local government to prepare a Local Coastal Program that is in conformity with the provisions of Chapter 3 (commencing with Section 30200) shall be accompanied by a specific finding which sets forth the basis for such conclusion.

The Venice area of the City of Los Angeles does not have a certified Local Coastal Program. The proposed project, as conditioned, is consistent with the habitat, coastal access, and recreation policies of the Coastal Act.

Therefore, the Commission finds that approval of the proposed development, as conditioned, will not prejudice the City's ability to prepare a Local Coastal Program consistent with the policies of Chapter 3 of the Coastal Act, as required by Section 30604(a).

G. California Environmental Quality Act

Section 13096 Title 14 of the California Code of Regulations requires Commission approval of a Coastal Development Permit application 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). Section 21080.5(d)(2)(i) of CEQA prohibits a proposed development from being approved if there are feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse impact which the activity may have on the environment.

The proposed project, as conditioned, has been found consistent with the Chapter 3 policies of the Coastal Act. All adverse impacts have been minimized and there are no feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse impact which the activity may have on the environment. Therefore, the Commission finds that the proposed project can be found consistent with the requirements of the Coastal Act to conform to CEQA.



Site

COASTAL COMMISSION

5-96-224

EXHIBIT # 1

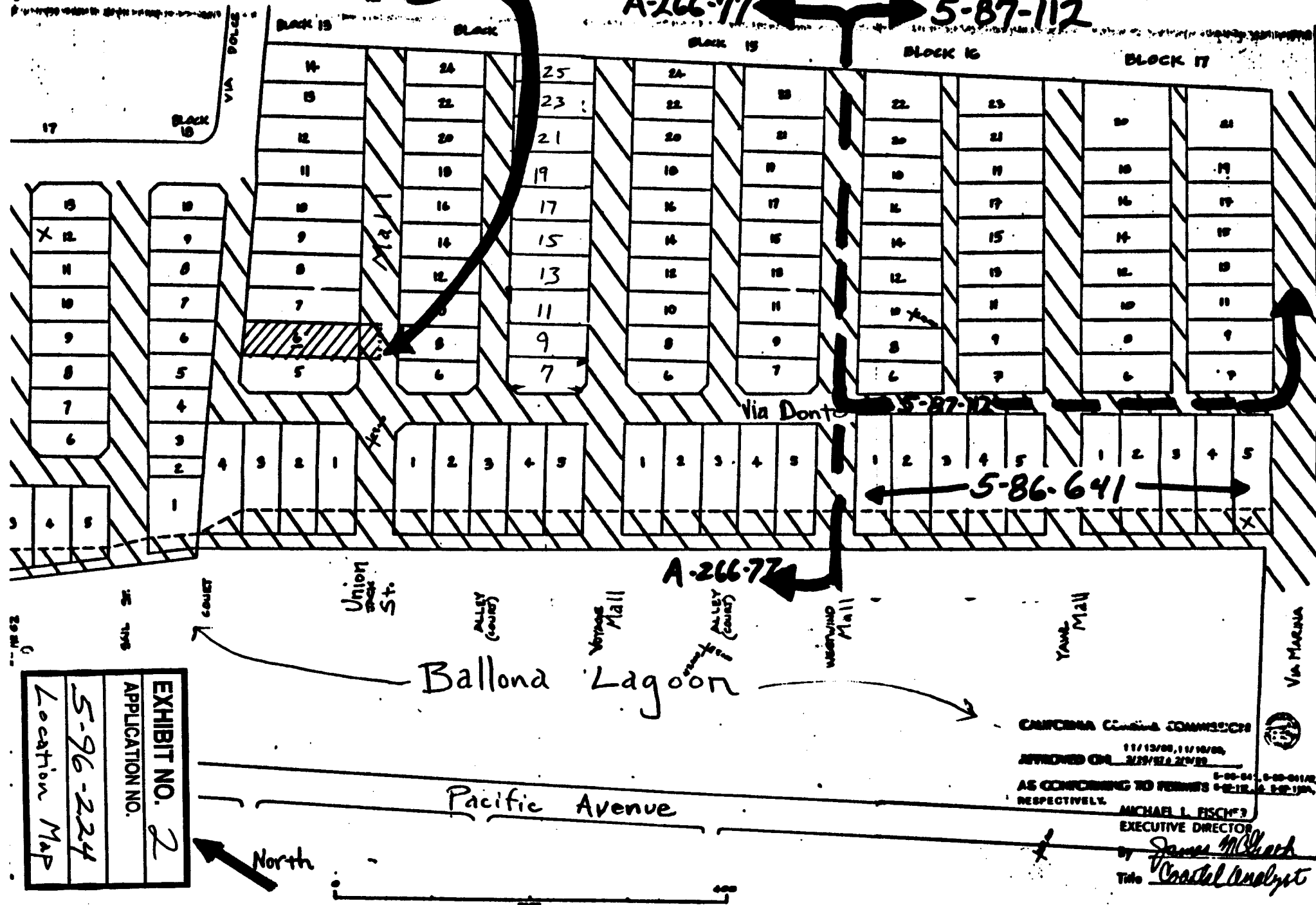
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Site

Del Rey Beach Tract

A-266-77

5-87-112



5-96-224

RECEIVED

MEMORANDUM

To: Chuck Posner

From: Jay Stark

Subject: Del Rey Beach - Union Jack Mall - Lot 6 and Lot 7 NOV 1 1996

Date: November 1, 1996

CALIFORNIA
COASTAL COMMISSION
SOUTH COAST DISTRICT

Chuck:

Per your discussion with Jeff Lee, enclosed please find a copy of the landscape plans for Union Jack Mall. As part of the development of Lot 6 and Lot 7, The Lee Group will install the landscape mall at the adjacent portions of Lot 6 and Lot 7. We are adding this as part of our project description. Please feel free to call me if you have any questions.

Thank you.

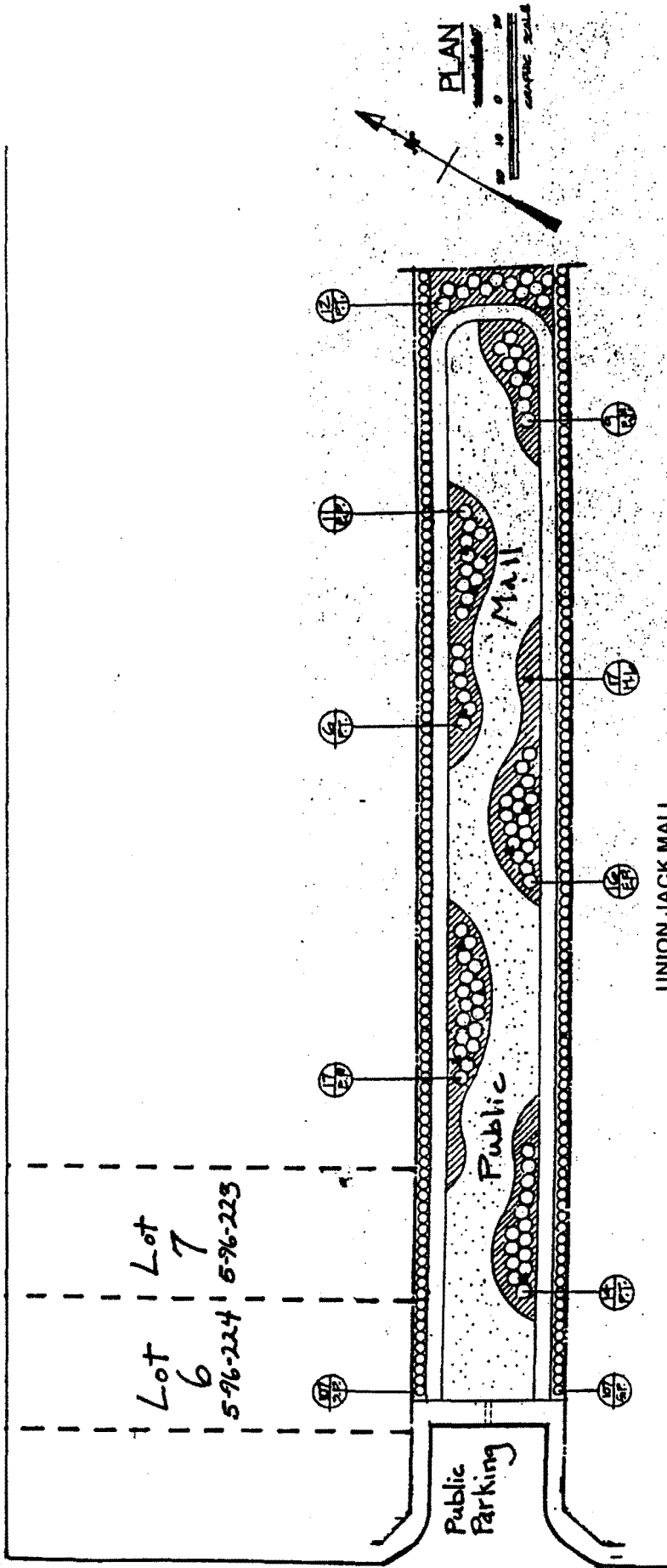
COASTAL COMMISSION

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EXHIBIT # 3

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Via Donte



PLAN

SCALE
1" = 100'

UNION JACK MALL

COASTAL COMMISSION

5-96-224

EXHIBIT # 3

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[illegible]

LOT AREA:	4,167.4 SQ. FT.
BUILDING AREA:	
FIRST FLOOR:	1,459.5 SQ. FT.
SECOND FLOOR:	1,960.0 SQ. FT.
THIRD FLOOR:	440.5 SQ. FT.
TOTAL:	4,492.8 SQ. FT.
GARAGE:	541.4 SQ. FT.
PAVED AREA:	560.5 SQ. FT.
LANDSCAPED AREA:	1,042.2 SQ. FT.
UNIMPROVED AREA:	NONE

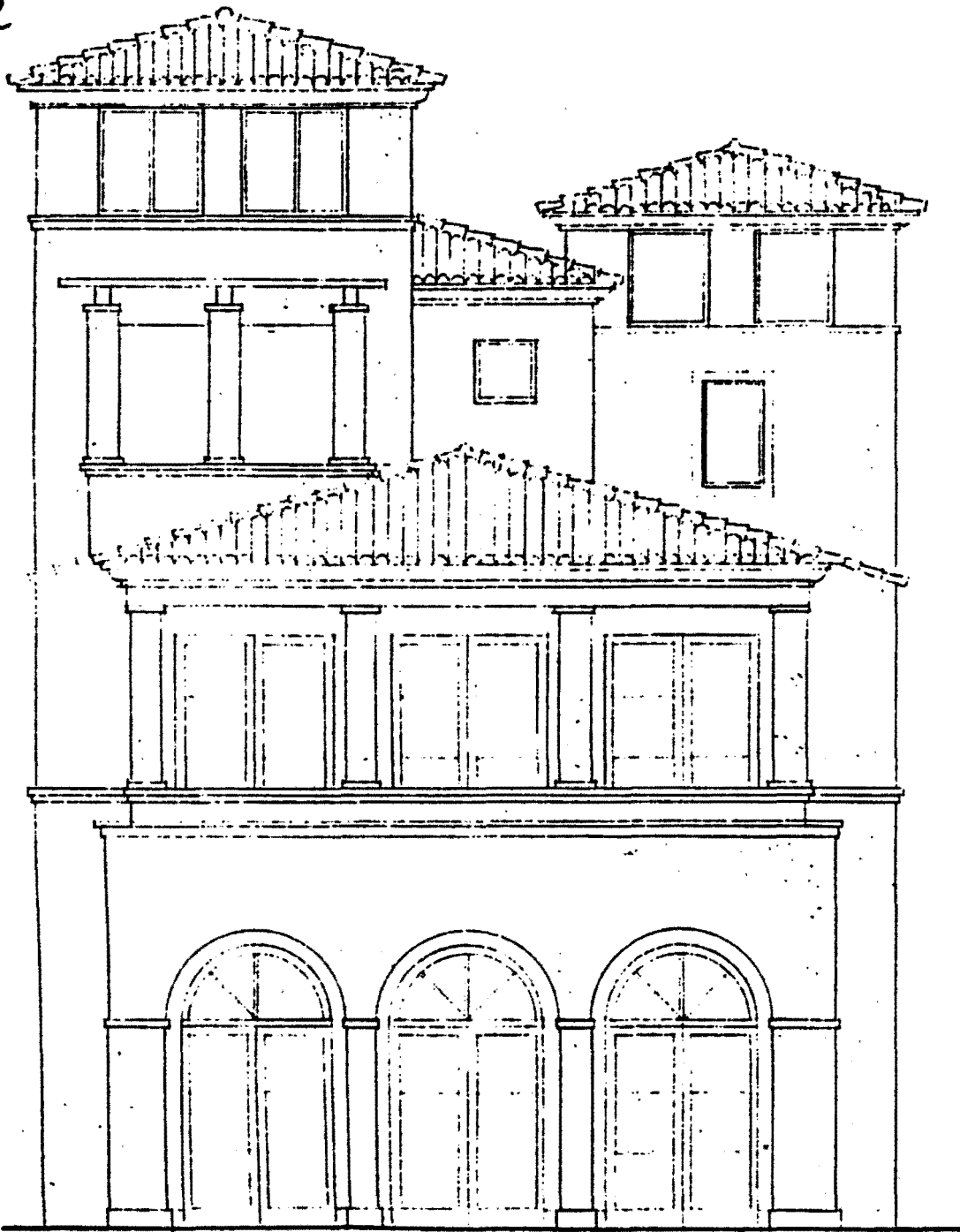
LOT 6 - DEL REY TRACT BLOCK 19 1'-0"

**PROPOSED SINGLE-FAMILY
3-STORY RESIDENCE WITH
ATTACHED 3-CAR GARAGE.**

5-96-224

PAGE 1 OF 1

42'



SOUTH ELEVATION

Union Jack Mall

Lot 6

COASTAL COMMISSION

5-96-224

EXHIBIT # 5

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