CALIFORNIA COASTAL COMMISSION SOUTH CENTRAL COAST AREA 89 SOUTH CALIFORNIA ST., SUITE 200 VENTURA, CA 93001 (805) 641-0142

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Staff:	J. Johnson ge	
Staff Report:	3/19/96 00	
learing Date:	4/9-12/96	
Commission Action:		
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STAFF REPORT: CONSENT CALENDAR

APPLICATION NO.: 4-96-022

APPLICANT: Mr. and Mrs. Alan Smith

AGENT: Matt Kivlin, Architect

PROJECT LOCATION: 6301 Porterdale Drive, City of Malibu, Los Angeles County

PROJECT DESCRIPTION: The construction of a two-story 7491 sq. ft., 25 ft. high single family residence and three car garage, 750 sq. ft. guest house, pool and spa, retaining walls, entry gates, fences, septic system, and grade 1896 cubic yards of material including 1229 cubic yards of remedial recompaction.

Lot area: Building coverage: Pavement coverage: Landscape coverage: Parking spaces: Plan Designation: Zoning: Project Density: Ht abv fin grade: 89,363 sq. ft. 5,674 sq. ft. 5,755 sq. ft. 10,000 sq. ft. four Residential Rural Residential 2 1 du/ 2 acres 25 ft.

LOCAL APPROVALS RECEIVED: Approval in Concept, City of Malibu Planning Department dated 2/1/96; In Concept Approval for Septic System, Department of Environmental Health, City of Malibu, dated January 30, 1996.

SUBSTANTIVE FILE DOCUMENTS: Certified Malibu/Santa Monica Mountains Land Use Plan; Coastal Permit 4-94-115, Traub; Coastal Permit 4-95-191, Damian; Coastal Permit 4-95-237, Perman; Coastal Permit 4-95-243, Cortazzo.

SUMMARY OF STAFF RECOMMENDATION:

Staff recommends approval of the proposed project with five (5) Special Conditions addressing design restrictions, landscape and erosion control plans, plans conforming to the consulting geologist's recommendations, a wild fire waiver of liability, and a future development restriction.

The project site is located within a partially developed subdivision about two miles north of Pacific Coast Highway between Escondido and Ramirez Canyons. The vacant site is the crest of a broad north-south ridge located at the northwest corner of Porterdale and Winding Way. To the west and east of the site are unnamed drainages which lead directly onto Escondido Beach. The proposed development will be visible to the south from the relocated Coastal Slope trail located along Winding Way. The applicant proposes some grading to construct the project including 1229 cubic yards of remedial recompaction as recommended by the consulting geologist.

I. STAFF RECOMMENDATION

Approval with Conditions

The Commission hereby <u>grants</u> a permit for the proposed development, subject to the conditions below, on the grounds that, as conditioned, the development 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. <u>Notice of Receipt and Acknowledgment</u>. 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. <u>Expiration</u>. 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. <u>Compliance</u>. All development must occur in strict compliance with the proposal as set forth below. Any deviation from the approved plans must be reviewed and approved by the staff and may require Commission approval.
- 4. <u>Interpretation</u>. Any questions of intent or interpretation of any condition will be resolved by the Executive Director or the Commission.
- 5. <u>Inspections</u>. The Commission staff shall be allowed to inspect the site and the development during construction, subject to 24-hour advance notice.
- 6. <u>Assignment</u>. 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. <u>Terms and Conditions Run with the Land</u>. 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. <u>Special Conditions</u>

1. DESIGN RESTRICTIONS

Prior to issuance of the Coastal Development Permit, the applicant shall execute and record a deed restriction, in a form and content acceptable to the Executive Director, which restricts the color of the subject structures and roofs to colors compatible with the colors of the surrounding environment. White tones shall not be acceptable. All windows and glass for the proposed structure shall be of non-glare glass. The document shall run with the land for the life of the structure approved in this permit, binding all successors and assigns, and shall be recorded free of prior liens.

2. LANDSCAPE AND EROSION CONTROL PLANS

Prior to issuance of permit, the applicant shall submit a landscape plan prepared by a licensed landscape architect and an erosion control plan prepared by a licensed engineer for review and approval by the Executive Director. The plans shall incorporate the following criteria:

- All graded areas on the subject site shall be planted and maintained a) for erosion control and visual enhancement purposes. To minimize the need for irrigation and to screen or soften the visual impact of landscaping shall consist primarily of native, development all drought resistant plants as listed by the California Native Plant Society, Los Angeles - Santa Monica Mountains Chapter, in their document entitled Recommended Native Plant Species for Landscaping in the Santa Monica Mountains, dated October 4, 1994. Invasive. non-indigenous plant species which tend to supplant native species shall not be used. The plan shall include vertical elements, such as trees, which break up the appearance of the proposed structure and partially screens the structure from Pacific Coast Highway and Winding Way.
- b) All disturbed areas on the subject site shall be planted and maintained for erosion control and visual enhancement purposes according to the approved landscape plan within thirty (30) days of final occupancy of the residence. Such planting shall be adequate to provide ninety (90) percent coverage within six (6) months and shall be repeated, if necessary, to provide such coverage.
- c) Should grading take place during the rainy season (November 1 March 31), sediment basins (including debris basins, desilting basins, or silt traps) shall be required on the project site prior to or concurrent with the initial grading operations and maintained through the development process to minimize sediment from runoff waters during construction. All sediment should be retained on-site unless ' removed to an appropriate approved disposal location.
- The erosion control plan shall assure that run-off from the roof, d) patios, and all other impervious surfaces on the subject parcel are collected and discharged in a non-erosive manner which avoids ponding on the pad area. Site drainage shall not be accomplished by sheet flow runoff over the face of the slope which descends to a drainage area on the southern portion of the parcel. The erosion control plan shall include revegetation of the remediated slope with drought-tolerant, native species more specifically described in the landscape plan above. The plan shall also include application of geotextiles or other appropriate materials to prevent erosion of the slope surface during establishment of new plantings. By the acceptance of this permit, the applicant agrees to maintain the drainage devices on a yearly basis in order to insure that the system functions properly. Should the device fail or any erosion result from drainage from the project, the applicant or successor interests shall be responsible for any necessary repairs and restoration.

3. PLANS CONFORMING TO GEOLOGIC RECOMMENDATION

Prior to the issuance of the permit the applicant shall submit, for the review and approval by the Executive Director, evidence of the geology consultant's review and approval of all project plans. All recommendations contained in the two reports, "Engineering Geologic Report and Geotechnical Report for Proposed Subdivision of a 2.4 Acre Lot Into Two Parcels, APN 4467-4-11, Winding Way and Porterdale, Malibu, Los Angeles County, California, dated April 30, 1990, and Response to City of Malibu Geology Review Sheet, Dated May 11, 1995, Proposed Single Family Residence, APN 4467-4-11, Winding Way and Porterdale, Los Angeles County, California, dated November 6, 1995 by Donald B. Kowalewsky, Environmental & Engineering Geology, including issues related to <u>site preparation, temporary excavation, foundations, footing, retaining</u> <u>wall, cut and fill slopes, concrete slab, and drainage</u>, shall be incorporated in the final project plans. All plans must be reviewed and approved by the geologic consultants.

The final plans approved by the consultant shall be in substantial conformance with the plans approved by the Commission relative to construction, grading and drainage. Any substantial changes in the proposed development approved by the Commission which may be required by the consultant shall require an amendment to the permit or a new coastal permit.

4. WILD FIRE WAIVER OF LIABILITY

Prior to the issuance of the coastal development permit, the applicant shall submit a signed document which shall indemnify and hold harmless the California Coastal Commission, its officers, agents and employees against any and all claims, demands, damages, costs, expenses, of liability arising out of the acquisition, design, construction, operations, maintenance, existence, or failure of the permitted project in an area where an extraordinary potential for damage or destruction from wild fire exists as an inherent risk to life and property.

5. FUTURE DEVELOPMENT RESTRICTION

Prior to the issuance of a coastal development permit, the applicant shall execute and record a document, in a form and content acceptable to the Executive Director, stating that any future structures, additions or improvements related to the guest house or second unit, approved under coastal development permit number 4-96-022, will require a permit from the Coastal Commission or its successor agency. The document shall run with the land, binding all successors and assigns, and shall be recorded free of prior liens and any other encumbrances which the Executive Director determines may affect the interest conveyed.

IV. <u>Findings and Declarations</u>.

A. <u>Project Location and Description</u>

The project site is located within a partially developed subdivision about two miles north of Pacific Coast Highway between Escondido and Ramirez Canyons. (Exhibits 1, 2, and 3) The vacant two acre site is the crest of a broad ridge that gently descends in a a north-south direction located at the northwest corner of Porterdale and Winding Way. The property ranges from 230 feet above sea level at the southeast corner to 320 feet on the north side of the property. The slope gradient ranges from 6:1 along the ridge and for most of the property to 2.5:1 along the south facing slope at the northeast corner.

To the west and east of the site are unnamed drainages which lead directly onto Escondido Beach. The project site is accessed from Porterdale Drive. The lot is covered with grasses and there is one tree that will remain on the property near Winding Way.

The applicants proposes to construct a two-story 7491 sq. ft., 25 ft. high single family residence with a 833 sq. ft. three car garage, a 750 sq. ft. guest house, pool and spa, fences, various retaining walls, entry gates, and a septic system. (Exhibits 4, - 13) Remedial recompaction is proposed as recommended by the consulting geologist by grading 1126 cubic yards of cut and an equal amount of fill for the building sites prior to the final project grading of a 338 cubic yard cut and 429 cubic yard fill. (Exhibits 10 and 11)

The Los Angeles County Land Use Plan designates the lot as Residential I, one dwelling unit per acre. The City of Malibu designates the zoning on the lot as Rural Residential two acre minimum lot size.

B. <u>Visual Impacts</u>

Section 30251 of the Coastal Act states that:

The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas. New development in highly scenic areas such as those designated in the California Coastline Preservation and Recreation Plan prepared by the Department of Parks and Recreation and by local government shall be subordinate to the character of its setting.

The project site is located about 120 feet in elevation above Pacific Coast Highway to the south, bounded by a residence on the west, Winding Way on the south, Porterdale Drive on the east, and a vacant lot on the north. This area is characterized by lower intensity rural-type residential development.

The two acre lot descends from about the 320 foot elevation to 230 feet elevation along Porterdale Drive. The proposed project site is about one and one-half miles to the south east of the Santa Monica Mountains National Recreation Area (SMMNRA) land located along Kanan Dume Road and about the same distance from another portion of the SMMNRA to the northeast at Solistic Canyon.

Although the project site is visible from Pacific Coast Highway, this portion is not considered a first priority scenic highway, as the Malibu/Santa Monica Mountains Land Use Plan designates this section of the Highway as a second priority scenic segment. (See Exhibit 8 for the south elevation.) Because the location of the proposed residence is about a quarter of a mile north of Pacific Coast Highway, the appearance of the residence will be limited. However, the relocated Coastal Slope Trail is located along the south side of Winding Way Road immediately south of the project site. The proposed residence will be highly visible from this public trail, and Winding Way.

In conclusion, the residence will be visible from public viewing areas along the Coastal Slope Trail and Winding Way, and to a limited degree from a distance from Pacific Coast Highway. In order to ensure that the color of the structures and the potential glare of the glass windows will not create

adverse visual impacts, the Commission finds it necessary to require the applicant to use colors compatible with the the colors found in the surrounding area for exterior materials of the proposed structure and non-glare glass for all proposed windows and glass as required by condition number one (1). Additionally, visual impacts can be further mitigated by requiring all graded areas and the perimeter of the structures to be adequately landscaped. Although the applicant proposes to landscape the area surrounding the residence, the plan has not been submitted. The landscaping should consist of native, drought resistant plants. The landscape plan should be designed to minimize and control erosion, as well as, screen and soften the visual impact of the structures. Therefore, condition number two. (2) requires the applicant to submit a landscape plan meeting the above requirements to minimize the visual impact and an erosion control plan to minimize erosion as a result of the proposed project. The Commission finds that the proposed project, as conditioned, is consistent with Section 30251 of the Coastal Act.

C. <u>Geologic and Fire Hazards</u>

Section 30253 of the Coastal Act states, in part, that new development shall:

(1) Minimize risks to life and property in areas of high geologic, flood, and fire hazard.

(2) Assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs.

The proposed development is located in the Malibu area which is generally considered to be subject to an unusually high number of natural hazards. Geologic hazards common to the Malibu area include landslides, erosion, and flooding. In addition, fire is an inherent threat to the indigenous chaparral community of the coastal mountains. Wild fires often denude hillsides in the Santa Monica Mountains of all existing vegetation, thereby contributing to an increased potential for erosion and landslides on property.

The Commission reviews the proposed project's risks to life and property in areas where there are geologic, flood and fire hazards. Regarding the geologic and flood hazards, the applicant submitted two geologic reports titled: "Engineering Geologic Report and Geotechnical Report, For Proposed Subdivision of a 2.4 Acre Lot Into Two Parcels, APN 4467-4-11, Winding Way and Porterdale, Malibu, Los Angeles County, California; and Response to City of Malibu Geology Review Sheet Dated May 11, 1995, Proposed Single Family Residence, APN 4467-4-11, Winding Way and Porterdale, Los Angeles County, California. These reports address the geology issues by concluding:

Provided the following recommendations are incorporated in the plans and implemented, building sites as designated on the geologic map Plate 1, will be safe from landslide, settlement or slippage. In addition, development of the proposed parcels, utilizing the following recommendations, will not adversely affect offsite property. Bedrock can be readily excavated by conventional truck mounted drill rigs or other grading equipment.

Based on the revised site plan provided by project architect Matt Kivlin, a single family dwelling, a guest house and a swimming pool are proposed approximately at the middle of the subject site. ... Five geologic cross

> sections were prepared for slope stability analyses. The on site slopes have slope gradients less than 3:1. ... The analyses indicate factors of safety greater than minimum Code requirements. The residual shear strength parameters of bedrock and terrace deposits determined by SWN Soiltech consultants, Inc. and the back-calculated mobilized shear strength parameters of sliding materials were used in analysis. This office will assume the responsibility for the use of SWN shear strength parameters in the slope stability analyses.

> We have visited the project site and found it to be essentially unchanged with respect to geologic and soils engineering conditions from the time the referenced reports were prepared. The conclusions and recommendations contained in the referenced reports, unless superseded by this report, are considered applicable to the proposed development at this time.

The recommendations in the Geotechnical report address the following issues: site preparation, temporary excavation, foundations, footing, retaining wall, cut and fill slopes, concrete slab, and drainage. Based on the findings and recommendations of the consulting geologist, the Commission finds that the consistent with PRC 30253 development is Section SO long all as recommendations regarding the proposed development are incorporated into project plans. Therefore, the Commission finds it necessary to require the applicant to submit project plans that have been certified in writing by the consulting geology consultant as conforming to their recommendations, noted in condition number three (3) for the final project design, grading and drainage plans for the residence.

Although the applicant has submitted a grading plan, a drainage plan was not submitted. The drainage plan should provide for the positive discharge of water through drainage routes and energy dissipators in a manner would reduce the potential for erosion. The above geology report includes recommendations regarding surface drainage which will be applied as appropriate by the consulting geologist when the final plans are reviewed and approved by the consulting geologist. Condition number two (2) requires the submittal of a drainage/erosion control plan to minimize erosion and provide for surface discharge in a non-erosive manner.

Additionally, due to the fact that the proposed project is located in an area subject to an extraordinary potential for damage or destruction from wild fire, the Commission will only approve the project if the applicant assumes liability from the associated risks. Through the waiver of liability, the applicant acknowledges and appreciates the nature of the fire hazard which exists on the site and which may affect the safety of the proposed development, as incorporated by condition number four (4).

The Commission finds that only as conditioned to incorporate the landscape and erosion control plans, all recommendations by the applicant's consulting geologist, and the wild fire waiver of liability, will the proposed project be consistent with Section 30253 of the Coastal Act.

D. <u>Septic System</u>

The Commission recognizes that the potential build-out of lots in Malibu, and the resultant installation of septic systems, may contribute to adverse health effects and geologic hazards. The Coastal Act includes policies to provide for adequate infrastructure including waste disposal systems. Section 30231 of the Coastal Act states that: The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface water flow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.

Section 30250(a) of the Coastal Act states in part that:

New residential, ... development, ... shall be located within, ... existing developed areas able to accommodate it ... and where it will not have significant adverse effects, either individually or cumulatively, on coastal resources.

The proposed development includes constructing a septic system for the new residence and guest house to provide for adequate sewage disposal. Exhibit 13. The applicant's geology and soils report indicates that the percolation rate exceeds the maximum Plumbing Code requirements for the project. The applicant has submitted a conceptual approval for the sewage disposal system from the Department of Environmental Health Services, City of Malibu. This approval indicates that the sewage disposal system for the project in this application complies with all minimum requirements of the City of Malibu Plumbing Code. The Commission has found in past permit actions that compliance with the health and safety codes will minimize any potential for waste water discharge that could adversely impact coastal waters. Therefore, the Commission finds that the proposed septic system is consistent with Sections 30231 and 30250 of the Coastal Act.

E. Second Residential Unit

Sections 30250 and 30252 of the Coastal Act address the cumulative impacts of new developments. Section 30250 (a) of the Coastal Act states:

(a) New residential, commercial, or industrial development, except as otherwise provided in this division, shall be located within, contiguous with, or in close proximity to, existing developed areas able to accommodate it or, where such areas are not able to accommodate it, in other areas with adequate public services and where it will not have significant adverse effects, either individually or cumulatively, on coastal resources. In addition, land divisions, other than leases for agricultural uses, outside existing developed areas shall be permitted only where 50 percent of the usable parcels in the area have been developed and the created parcels would be no smaller than the average size of surrounding parcels.

Section 30252 of the Coastal Act states:

The location and amount of new development should maintain and enhance public access to the coast by (1) facilitating the provision or extension of transit service, (2) providing commercial facilities within or adjoining residential development or in other areas that will minimize the use of coastal access roads, (3) providing non-automobile circulation within the development, (4) providing adequate parking facilities or providing substitute means of serving the development with public transportation, (5) assuring the potential for public transit for high intensity uses such as high-rise office buildings, and by (6) assuring that the recreational needs of new residents will not overload nearby coastal recreation areas by correlating the amount of development with local park acquisition and development plans with the provision of onsite recreational facilities to serve the new development.

New development raises coastal issues related to cumulative impacts on coastal resources. The construction of a second unit on the site where a primary residence exists intensifies the use of a parcel raising potential impacts on public services, such as water, sewage, electricity and roads. New development also raises issues regarding the location and amount of new development maintaining and enhancing public access to the coast.

Based on these policies, the Commission has limited the development of second dwelling units (the guest house) on residential parcels in the Malibu and Santa Monica Mountain areas. In addition, the issue of second units on lots with primary residences has been the subject of past Commission action in the certifying the Malibu Land Use Plan (LUP). In its review and action on the Malibu LUP, the Commission found that placing an upper limit on the size of second units (750 sq. ft.) was necessary given the traffic and infrastructure constraints which exist in Malibu and given the abundance of existing vacant residential lots. Furthermore, in allowing these small units, the Commission found that the small size of units (750 sq. ft.) and the fact that they are likely to be occupied by one or at most two people, such units would have less impact on the limited capacity of Pacific Coast Highway and other roads (as well as infrastructure constraints such as water, sewage, electricity) than an ordinary single family residence. (certified Malibu Santa Monica Mountains Land Use Plan 1986, page 29 and P.C.H. (ACR), 12/83 page V-1 - VI-1).

The second unit issue has also been raised by the Commission with respect to statewide consistency of both coastal development permits and Local Coastal Programs (LCPs). Statewide, additional dwelling units on single family parcels take on a variety of different functions which in large part consist of: 1) a second unit with kitchen facilities including a granny unit, caretaker's unit, and farm labor unit; and 2) a guesthouse, without separate kitchen facilities. Past Commission action has consistently found that both second units and guest houses inherently have the potential to cumulatively impact coastal resources. As such, conditions on coastal development permits and standards within LCP's have been required to limit the size and number of such units to ensure consistency with Chapter 3 policies of the Coastal Act (Certified Malibu Santa Monica Mountains Land Use Plan 1986, page 29).

As proposed, the 750 sq. ft. guest house conforms to the Commission's past actions allowing a maximum of 750 sq. ft. for a second dwelling unit in the Malibu area. To ensure that any additions or improvements that could further intensify the use of this guest house or second unit will be reviewed by the Commission, condition number five (5) is required. The Commission finds it is necessary to require the applicant to limit the size of the guest house or second unit consistent with condition number five (5). Therefore, Commission finds that, as conditioned, the proposed development is consistent with Sections 30250 and 30252 of the Coastal Act.

F. Local Coastal Program

Section 30604 of the Coastal Act states that:

(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 Chapter 3 (commencing with Section 30200) 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 Chapter 3 (commencing with Section 30200).

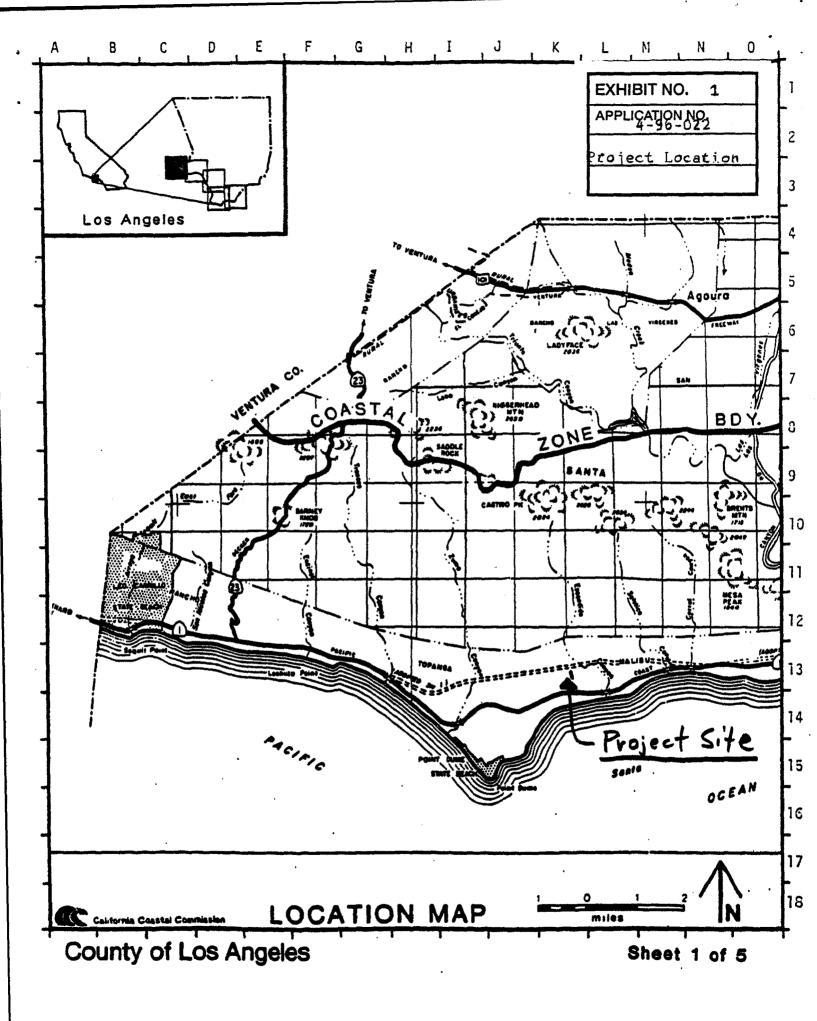
Section 30604(a) of the Coastal Act provides that the Commission shall issue a coastal permit only if the project will not prejudice the ability of the local government having jurisdiction to prepare a Local Coastal Program which conforms with Chapter 3 policies of the Coastal Act. The preceding sections provide findings that the proposed project will be in conformity with the provisions of Chapter 3 if certain conditions are incorporated into the project and accepted by the applicant. As conditioned, the proposed development will not create adverse impacts and is found to be consistent with the applicable policies contained in Chapter 3. Therefore, the Commission finds that approval of the proposed development, as conditioned, will not prejudice the City of Malibu's ability to prepare a Local Coastal Program for this area of Malibu that is also consistent with the policies of Chapter 3 of the Coastal Act as required by Section 30604(a).

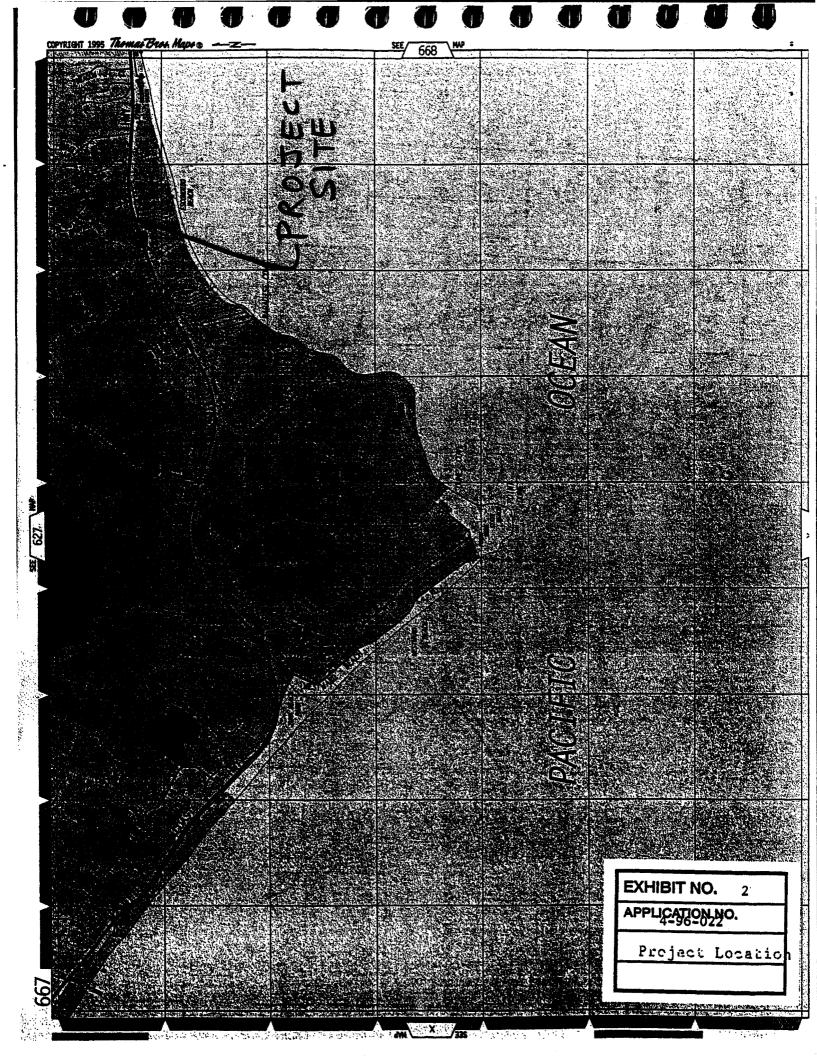
G. <u>California Environmental Ouality Act</u>

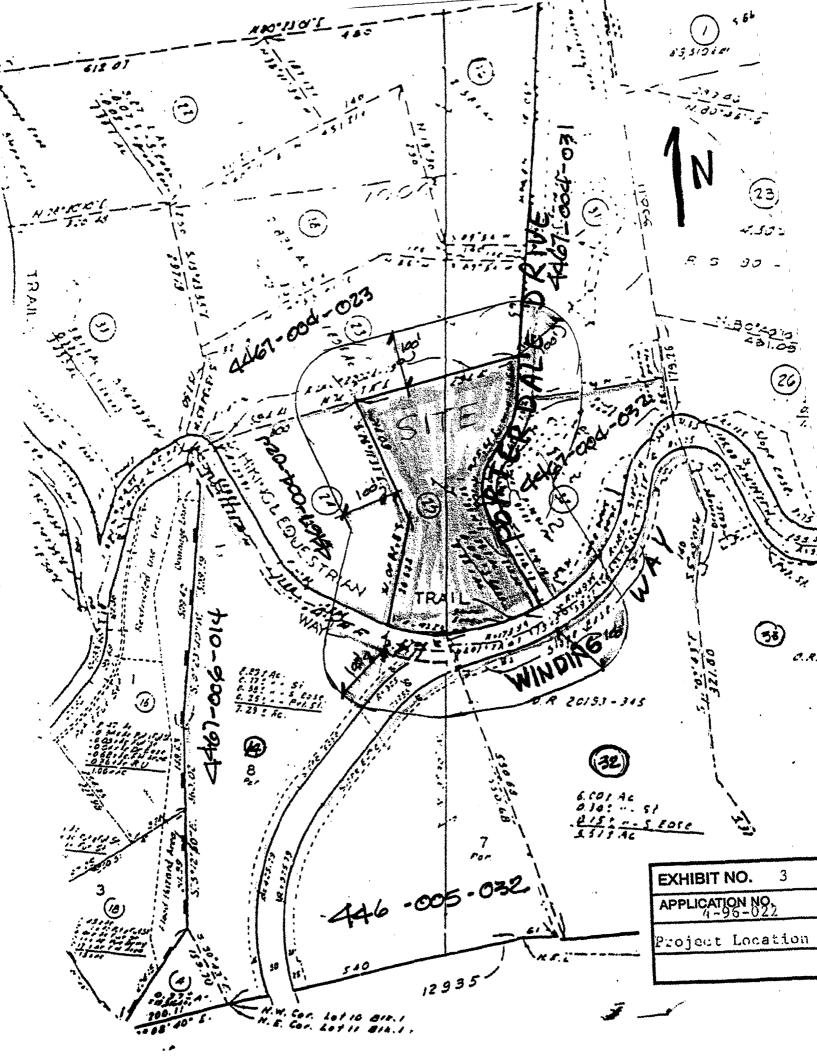
The Coastal Commission's permit process has been designated as the functional equivalent of CEQA. Section 13096(a) of the California Code of Regulations requires Commission approval of Coastal Development Permit applications to be supported by a finding showing the application, as conditioned by any conditions of approval, to be consistent with any applicable requirements of 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 that would substantially lessen any significant adverse impacts that the activity may have on the environment.

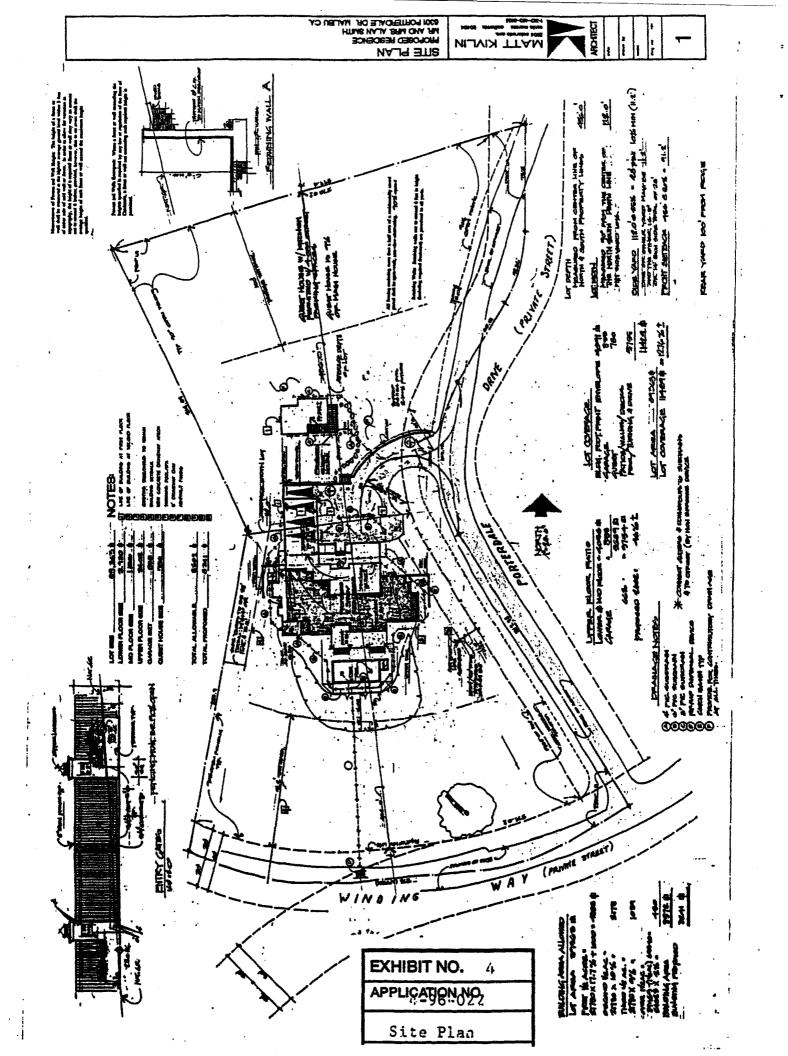
As discussed above, the proposed project has been mitigated to incorporate design restrictions, landscape and erosion control plans, plans conforming to the consulting geologist's recommendations, a wild fire waiver of liability, and a future development restriction. As conditioned, there are no feasible alternatives or mitigation measures available, beyond those required, which would lessen any significant adverse impact 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 is found consistent with the requirements of CEQA and the policies of the Coastal Act.

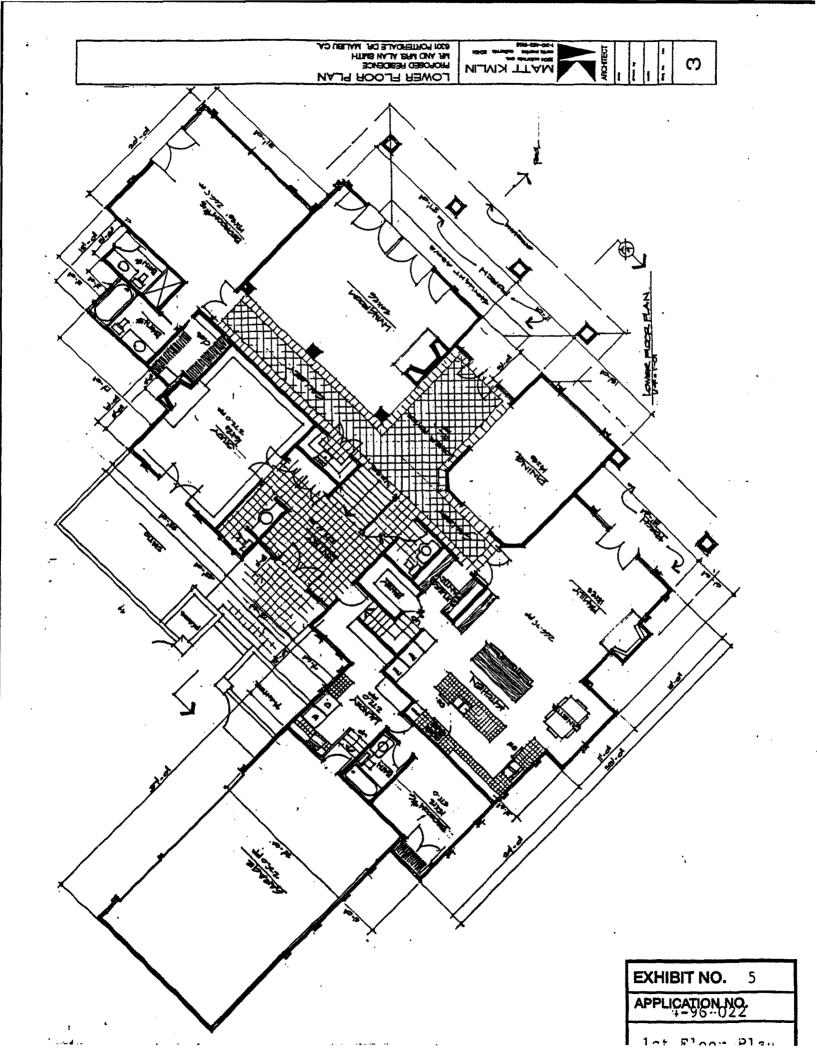
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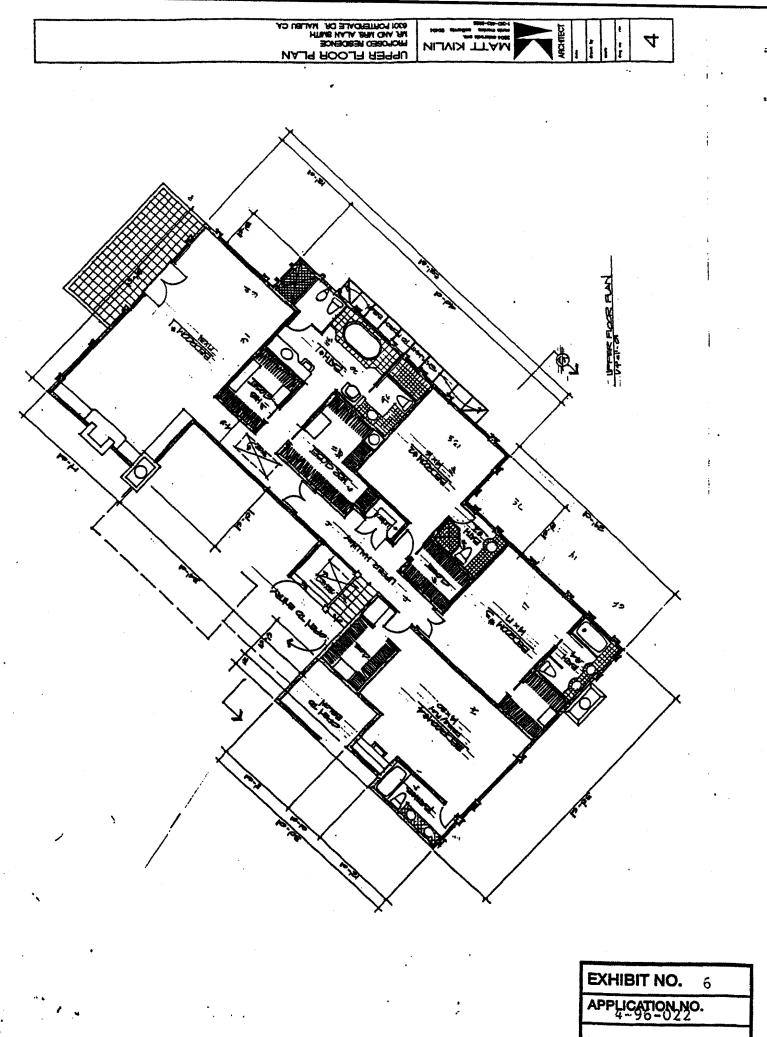




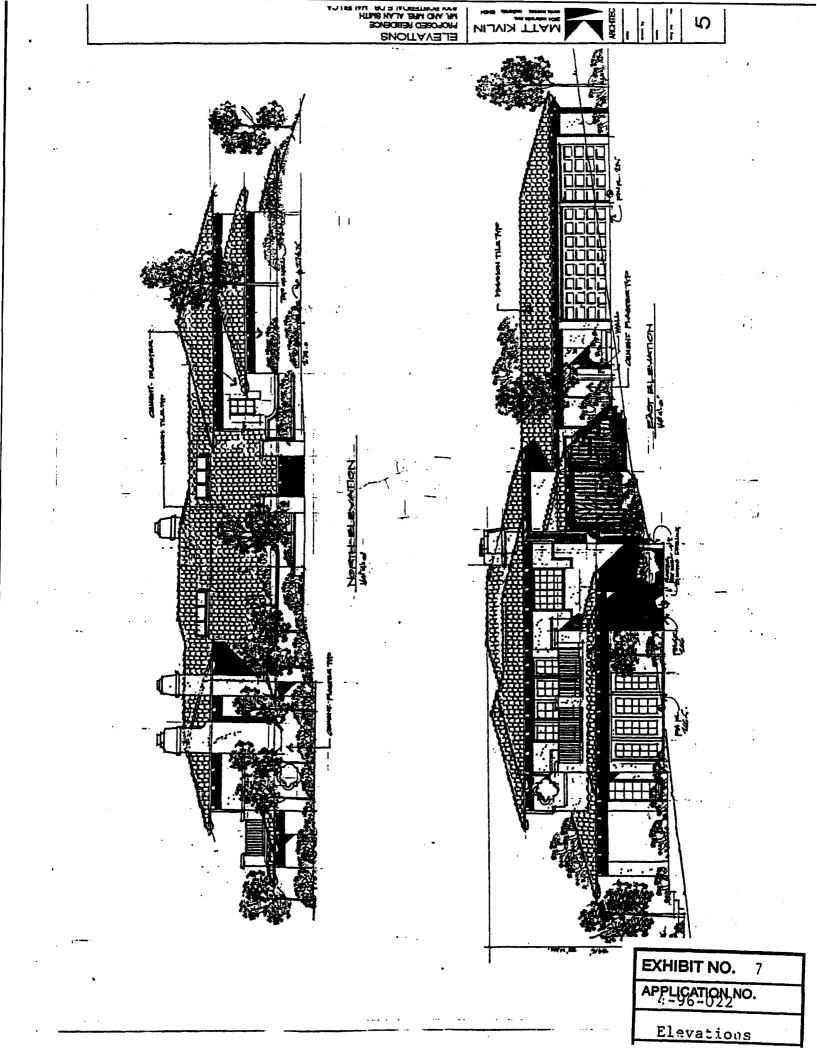


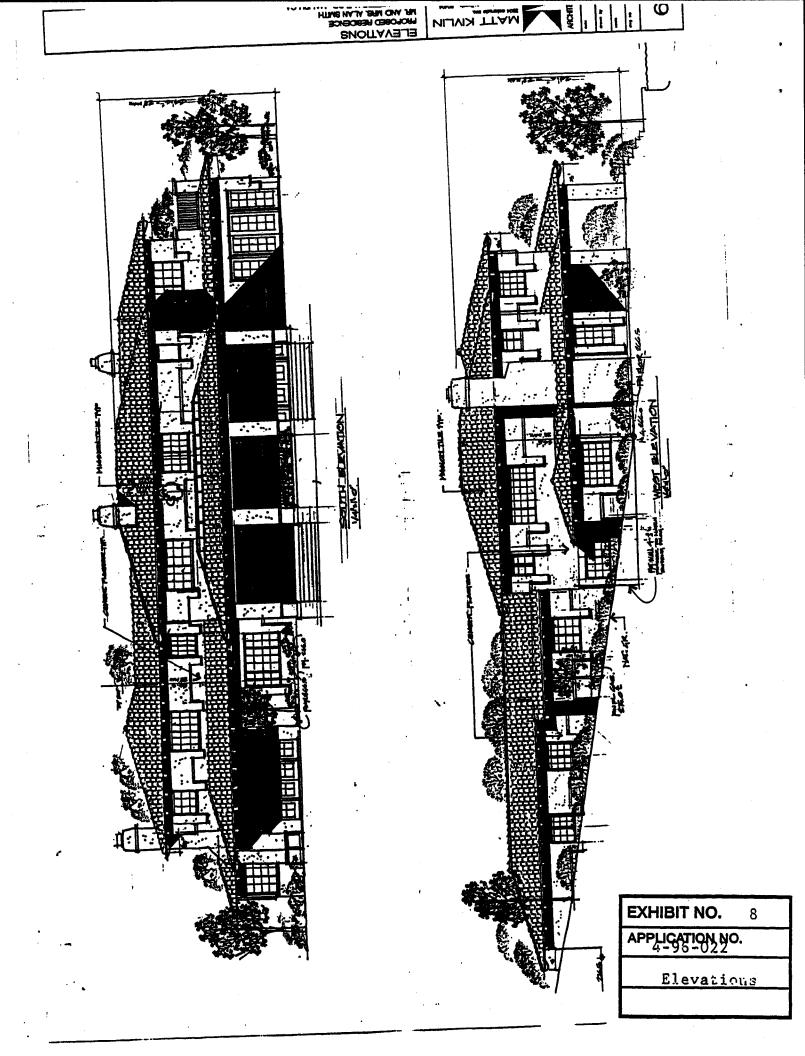


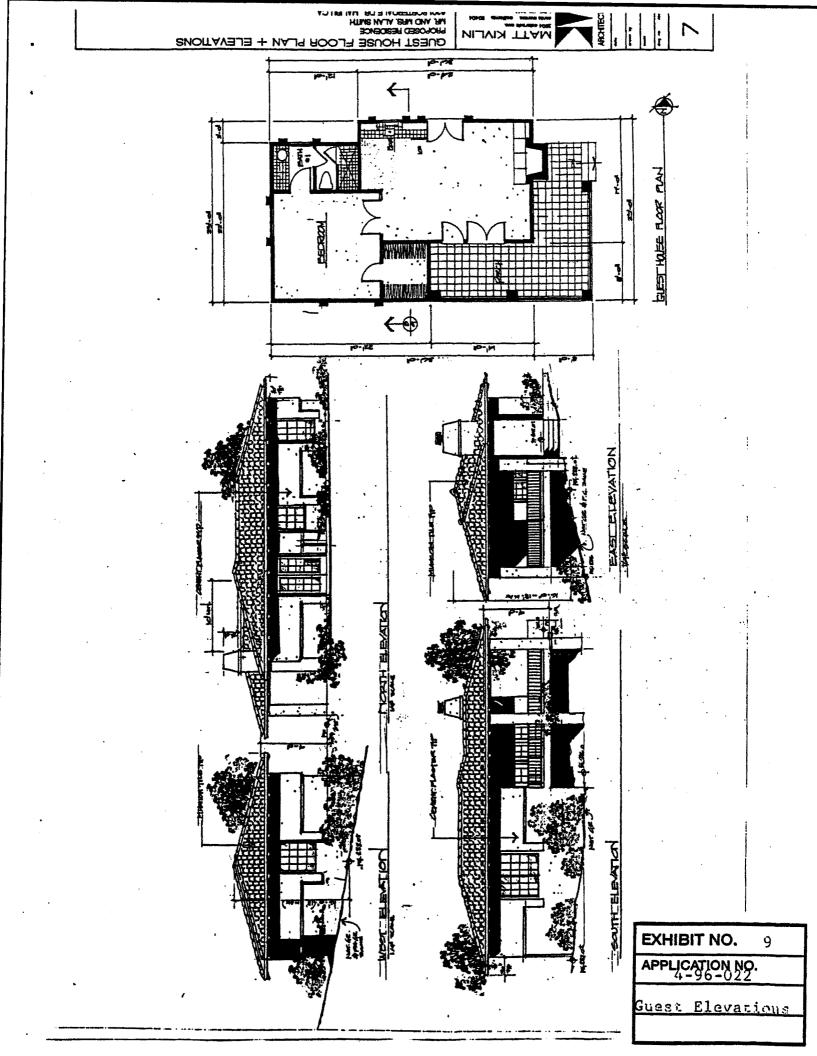




2nd Floor Plan







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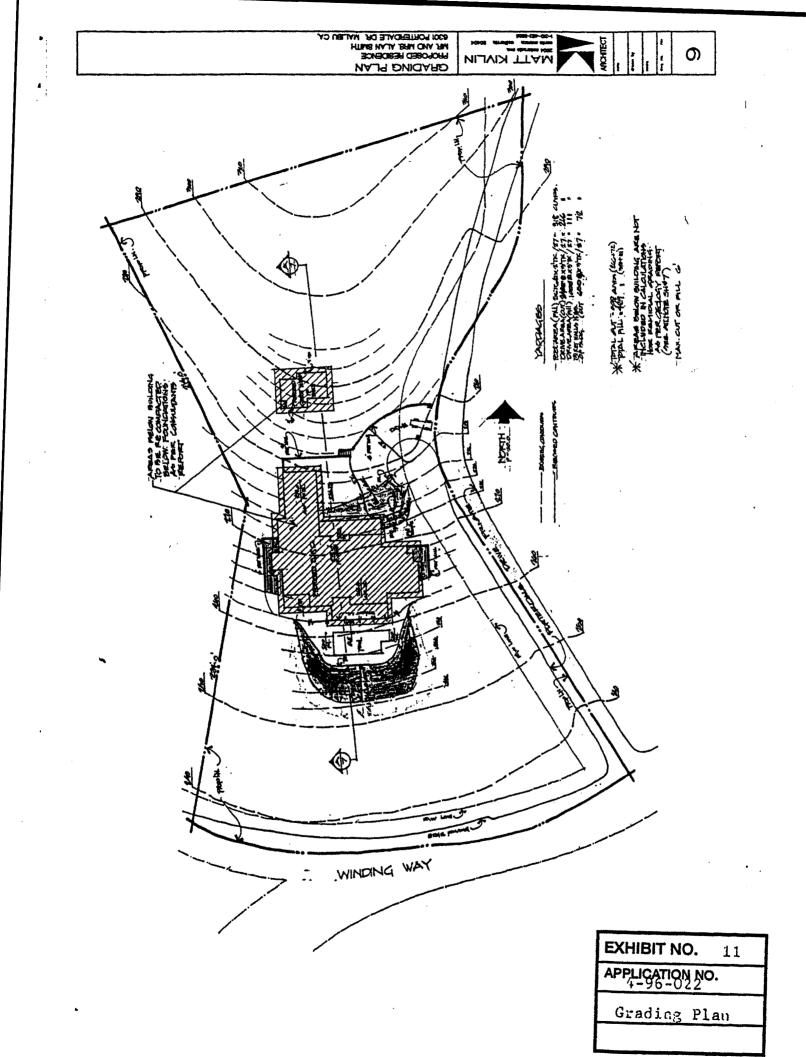
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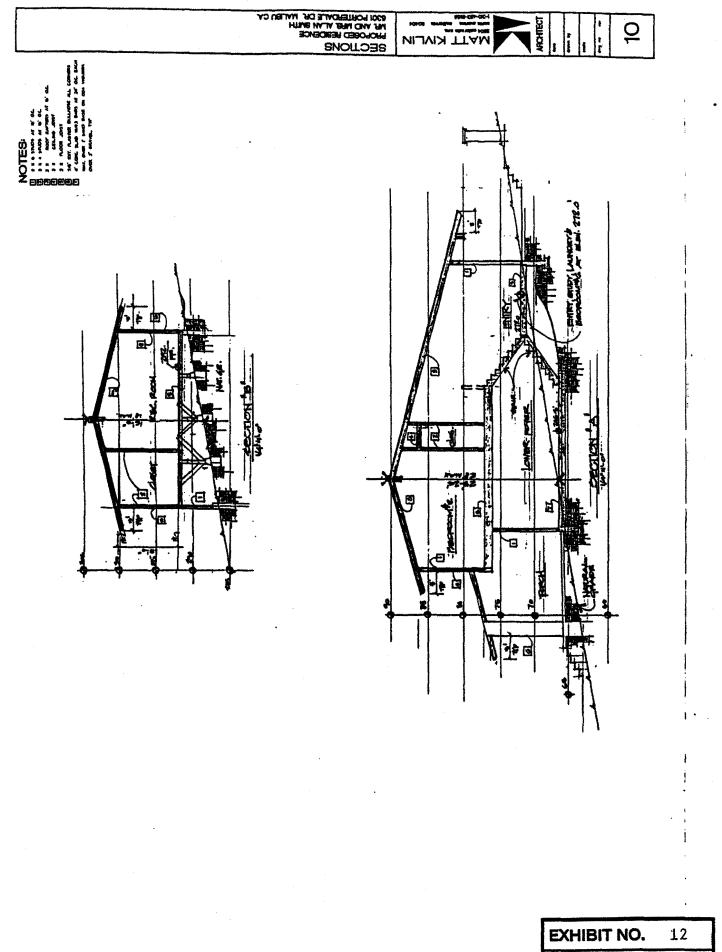
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SECTON A





APPL	ICATION	NO 222

Residence Section

