CALIFORNIA COASTAL COMMISSION
SAN DIEGO COAST AREA
3111 CAMINO DEL RIO NORTH, SUITE 200
SAN DIEGO, CA 92108-1725
(619) 521-8036

Staff: LRO-SD
Staff Report: March 11, 1996
Hearing Date: April 10-12, 1996

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AMENDMENT REQUEST
STAFF REPORT AND PRELIMINARY RECOMMENDATION

Application No.: 6-84-408-A

Applicant: Seaview LLC, a CA Ltd. Liability Co. Agent: Matthew Peterson, Esq.

Original Description: Demolition of an existing series of seawalls and construction of approximately 225 linear feet of concrete seawall.

Zoning	R-1-5
Plan Designation	Low Density Residential
Ht abv fin grade	17 feet (maximum)

Proposed Amendment: Repair an existing series of seawalls seaward of an existing oceanfront residence in lieu of demolition and reconstruction of the wall, including removal of existing seawall footings, construction of new seawall footings, and placement of a narrow high strength concrete scour panel on the face of the existing seawall with a bluff-colored and sculpted finish to match the adjacent natural land formations (bluffs).

Site: 6026 Camino de la Costa, La Jolla, San Diego, San Diego County. APN 357-151-02

Substantive File Documents: CDP #6-84-408/Zien; Geotechnical Report by Skelly Engineering dated January 1996; Update to Geotechnical Report by Skelly Engineering dated March 27, 1996; Geologic Evaluation of Sea Bluff and Soil/Wall Design Parameters by Geotechnical Exploration, Inc. - January 31, 1996; City of San Diego Certified LCP - SCR Ordinance; Certified La Jolla-La Jolla Shores LCP Addendum - 1983.

PRELIMINARY STAFF RECOMMENDATION:

Staff is recommending approval of the subject amendment request with special conditions for: a waiver of liability; seawall design and maintenance to incorporate exterior colors that blend in with the natural sandstone bluffs of the area; construction materials; and, timing of construction/staging areas.

PRELIMINARY STAFF RECOMMENDATION:

The staff recommends the Commission adopt the following resolution:

I. Approval with Conditions.

The Commission hereby grants a permit amendment for the proposed development as amended, subject to the conditions below, on the grounds that the development as amended 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.

See attached page.

III. Special Conditions.

The permit is subject to the following conditions:

1. Assumption of Risk. Prior to the issuance of the coastal development permit amendment, the applicant [and landowner] shall execute and record a deed restriction, in a form and content acceptable to the Executive Director, which shall provide: (a) that the applicant understands that the site may be subject to extraordinary hazard from wave action and the applicant assumes the liability from such hazard (b) the applicant hereby unconditionally waives any claim of liability against the Commission or its successors in interest and agrees to indemnify and hold harmless the Commission, its officers, agents, and employees relative to the Commission's approval of the project for any damage. The document shall run with the land, binding all successors and assigns, and shall be recorded free of prior liens.

2. Seawall Design and Maintenance. Prior to the issuance of the coastal development permit amendment, the applicant shall submit final plans approved by the City of San Diego, for the repairs to the existing seawall, to the Executive Director for review and written approval and shall be done in substantial conformance with the plans dated 1/22/96 by Skelly Engineering and accompanying geotechnical report dated January 1996 by same. The plans for the seawall shall demonstrate that:

a) the seawall shall be designed to incorporate surface treatments (e.g., air-placed concrete) that resemble the surface texture of the adjacent natural bluffs;

b) the color of the seawall shall match the color of the adjacent coastal bluffs to be verified through submittal of a color board;

c) the construction method and technology to be utilized for texturing

and coloring the wall shall provide assurance that the herein approved seawall will closely match the adjacent natural bluffs in color and texture for the lifetime of the structure.

d) the final plans shall delineate the methods for maintenance of the air-placed concrete to maintain the natural appearance, which shall be conducted annually. Maintenance of the protective works shall be the responsibility of the applicant. If after inspection, it is apparent additional repair or maintenance is necessary, the applicant should contact the Commission office to determine whether permits are necessary.

3. Construction Materials. Disturbance to sand and intertidal areas shall be minimized during construction of the seawall. Beach sand excavated shall be redeposited on the beach. Local sand, cobbles or shoreline rocks shall not be used for back-fill or construction material.

4. Construction Access/Staging Area/Project Timing. Prior to the issuance of the coastal development permit amendment, the applicant shall submit plans showing the locations, both on- and off-site, which will be used as staging and storage areas for materials and equipment during the construction phase of this project. The staging/storage plan shall be subject to review and written approval of the Executive Director. The plans shall indicate that no temporary storage will occur on sandy beach or public parking areas, including on-street parking. The plan shall also indicate that no work may occur on sandy beach during the summer months (Memorial Day to Labor day) of any year and that equipment used on the beach shall be removed from the beach at the end of each work day.

IV. Findings and Declarations.

The Commission finds and declares as follows:

1. Project History/Amendment and Site Description. The original permit (#6-84-408) for the subject site was approved by the Coastal Commission on September 14, 1984. The permitted work was to remove several existing seawalls which were failing and to construct approximately 225 linear feet of concrete seawall ranging in height from four to seventeen feet. The failing seawall protected a residence and accessory improvements seaward of the home. The applicant has confirmed that not all of the work which was authorized under the original permit was completed. Only an approx. 28 linear-foot section of seawall was demolished and replaced pursuant to the original permit. No other work has been done to the seawall since then. Since the applicant commenced with a portion of the permitted development pursuant to the subject coastal development permit, the permit is considered vested.

Since the permit is vested, the applicant has the option of continuing with the permitted development to demolish the remainder of the seawall and build a new one. However, techniques for seawall construction have changed, and improved, since 1984. The applicant seeks to amend the permit to repair the existing seawall using improved technology.

The subject site is an ocean blufftop lot comprised of an upper and lower mesa. The site contains an existing two-story single family residence with detached guest quarters over a three-car garage. Accessory improvements on the site seaward of the home consist of a swimming pool, garden walls, and a gazebo. As shown on the project plans, the home is located on the upper mesa (approx. +32.00 feet MSL) of the site and the garden and terrace walls with gazebo are located on the lower mesa (approx. +23.9 feet MSL). There is also a set of beach access stairs that lead from the lower mesa down to the beach level (approx. +5.7 feet MSL) of the site. The site is located on Camino de la Costa, which is in the southern portion of the community of La Jolla and is characterized by large custom and estate-type homes. The shoreline of this area consists of ocean blufftop lots situated adjacent to rocky headlands and tidepools. At some locations, there are small pocket beaches. Several older homes in the area have some form of shoreline protection generally consisting of vertical seawalls or upper bluff stabilization such as gunite.

The property has changed ownership three times since the Commission approved the original project. Assignment applications have been completed which effectively transfer the original coastal development permit to the current owner. The current applicant is proposing to amend the permit to repair the existing series of seawalls (approx. 132 linear feet) seaward of the home in lieu of demolishing and replacing them pursuant to the original permit. For the most part, the existing wall is comprised of five sections of seawall that were each constructed at different time periods. The wall is continuous except for one area of the wall that contains a gap or exposed area of bare bluff. This section of the bluff is between wall #2 and wall #3, pursuant to the project engineer, and is approx. ten feet in length. The current applicant now proposes to repair nearly the entire length of the existing seawall through removal of the existing seawall footings, which encroach approx. two feet seaward of the existing seawall, and replaceing them with new vertical footings (15 1/2 feet deep) along the entire length of the seawall. The face of the existing seawall will then be covered with a narrow high strength concrete scour panel. The panels will then be covered with an approx. four-inch thick bluff-colored shotcrete finish that will be sculpted and highlighted with concrete stain to match the adjacent natural land formations and coastal bluffs. At the very southern end of the property, there is a tall brick seawall--this is the only section of seawall on the subject site that the applicant has indicated the mean high tide line reaches. However, this portion of wall is not proposed to be replaced or repaired, presumably because it is still in good condition. All of the proposed repairs will stay within the existing footprint of the existing wall and no backfilling or landscaping is proposed in association with the seawall.

Since the time of the original permit, the City's LCP for the La Jolla community has been certified and the City is now the permit-issuing authority for coastal development permits in this area. However, in this case, the applicant is seeking to amend the originally-approved permit which was to demolish an existing seawall and construct a new one in its place, by simply repairing the existing seawall instead. As such, an amendment may be processed to the previous permit issued by the Commission.

2. Shoreline Hazards/Geologic Stability. Coastal Act Section 30235 states, in part:

> Revetments,...seawalls, cliff retaining walls, and other such construction that alters natural shoreline processes shall be permitted when required to... protect existing structures or public beaches in danger from erosion, and when designed to eliminate or mitigate adverse impacts on local shoreline sand supply.

In addition, Section 30253 states, in part:

> New development shall:
>
> (1) Minimize risks to life and property in areas of high geologic, flood, and fire hazard.
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> (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 Commission has traditionally been concerned with the siting of new development directly along the shoreline in terms of both its encroachment onto public sandy beach as well as visual impacts. Bluff erosion has been a concern for this coastal area and there are numerous older homes which have drainage pipes which directly discharge onto the bluff face in the surrounding area. The existing seawall on the subject site was constructed prior to the passage of the Coastal Act. In 1984 the Commission approved replacement of the existing wall. Through the subject amendment request, the Commission is approving a substantial renovation to the existing wall in lieu of demolishing it and replacing it with a new one.

As is noted above, the construction of shoreline protective devices may be permitted to protect existing principal structures in danger from erosion and hazardous conditions. In determining whether shoreline protection is required to protect existing structures, the Commission considers all possible alternatives for protection of the structures, including modifications to the structures. In this case, such alternatives have been considered and the applicant has documented that shoreline protection is necessary to protect the existing structure.

The repairs to the existing wall are necessary to protect the existing structure and are the least environmentally-damaging alternative. Specifically the engineer has noted the existing shore protection consists of five different walls of which the oldest is approx. 50 years old. Many sections of the wall do not have proper drainage, the steel within the walls has rusted, portions of the structural steel within the footings is exposed and deteriorated, and none of the walls are tied back to the bed rock. As

noted, a seawall designed by today's engineering standards would typically be founded approx. four feet into the bedrock, constructed of epoxy coated steel and corrosion resistant concrete and tied back into the bluff near the top of the wall. Most of the oceanfront residences in this area have some form of shoreline protection or bluff protection devices and the bluffs have been altered in some way including construction of block walls, terracing and air-placed concrete.

According to the geology report that was prepared for the subject site, as an alternative to repairing the existing wall, the applicant considered demolishing the existing series of seawalls and constructing a new seawall in their place. The difference is that through the subject amendment, the existing seawall can remain its place, and the applicant need only remove the existing seawall footings, trench below the existing wall, and pour in new concrete footings. The applicant will then place a pre-cast concrete panel on the face of the existing seawall.

According to the findings of the geology report, the removal of the existing seawalls would likely result in some destruction of the natural bluff behind the wall. In addition, according to the applicant, demolition of the walls would require closure of this part of the beach to the public for at least two months. Construction of a new wall would also require much more excavation of beach bed rock and the use of large excavation equipment on the beach. The proposed repairs, by contrast, will only require a minimum of approx. three weeks on the beach and the use of smaller hand-held equipment with far less short and long-term adverse impacts on the nearshore areas. As further noted in the engineering report, the original permit (approved in 1984) was for the construction of a new seawall with a plain vertical face which was visually acceptable at that time. Since then, aesthetic treatments to seawalls have been developed that enable seawalls to mimic the color and texture of natural bluffs. The amended project would include use of these treatments so that the resulting seawall will be bluff-colored and bluff-textured air-placed concrete.

In addition, the originally approved seawall incorporated footings which extended seaward of the seawall, did not incorporate methods for using tie-backs to the bedrock and used rebar for reinforcement. As proposed to be amended, the repairs to the seawall will remove the footings that encroach seaward of the wall, replace them with new concrete vertical footings, will incorporate tiebacks to the bedrock and a geosynthetic reinforcement. In lieu of demolishing the existing seawall and constructing a new one, the wall will be reinforced by the placement of precast high-strength, concrete scour panels on the face of the existing wall. All of these methods are an improved means of structural reinforcement for the seawall. In addition to the structural improvements, the applicant also proposes aesthetic improvements to the seawall consisting of a texturing and coloring the wall with air-placed concrete which will make the wall blend in with the natural surrounding bluffs and sandstone shelves in the area.

Therefore, in summary, the Commission finds that since the proposed repairs to the existing seawall are necessary to protect an existing residence, the

project, as conditioned, can be found consistent with Section 30235 of the Act. Additionally, the project involves replacement of an existing seawall which will not increase the impact of the structure on shoreline sand supply to any greater degree than the seawall that was constsructed prior to passage of the Coastal Act.

Also, due to the inherent risk of shoreline development and the Commission's mandate to minimize risks, the standard waiver of liability condition (Special Condition No. 1) has been attached. By this means, the applicant is notified of the risk and the Commission is relieved of liability in permitting the development. Pursuant to Section 13166(a)(1) of the Commission's regulations, an application may be filed to remove Special Condition No. 1 from this permit if the applicant presents newly discovered material or information regarding the existence of any hazardous condition which was the basis for the condition, if they could not with reasonable diligence have discovered and produced such information before the permit was granted.

3. Public Access. Section 30211 of the Coastal Act states:

> Development shall not interfere with the public's right of access to the sea where acquired through use or legislative authorization, including, but not limited to, the use of dry sandy and rocky coastal beaches to the first line of terrestrial vegetation.

In addition, Section 30212 of the Act states, in part:

> (a) Public access from the nearest public roadway to the shoreline and along the coast shall be provided in new development projects except where:
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> (1) it is inconsistent with public safety, military security needs, or the protection of fragile coastal resources,
>
> (2) adequate access exists nearby....

Also, Section 30604(c) of the Act requires that a specific access finding be made for any project located between the first coastal roadway and the sea. The project site is located between the ocean and the first coastal roadway (Camino de la Costa). There remains uncertainty with regard to the exact location of the mean high tide line (MHTL) at this property. Commission staff has received conflicting information regarding the exact location of the MHTL and western property line. The Commission's mapping unit concluded that the MHTL is also the seaward lot line of the subject parcel. It was further stated that the existing seawall appears to meander in and out of the subject parcel's seaward lot line. The portion of the site inland of the MHTL is subject to the City's jurisdiction and that portion seaward of MHTL is subject to the Commission's jurisdiction. The assessor's parcel map shows the MHTL corresponding to the western property line in a zig-zag fashion; however, the applicant's surveyor has plotted the mean high tide line in an arc-shaped fashion approx. 25 feet seaward of the existing seawall, at its furthest

point. Based on the applicant's survey, commencing at the north portion of the property, the MHTL is about eight feet west of the existing seawall, at its midpoint, it is 25 feet west of the seawall, and at the southern portion of the site, the MHTL touches the southerly 15 feet of the existing seawall (a portion of seawall not modified herein). Thus, the Commission's mapping unit shows the existing seawall as encroaching onto state lands (i.e., land seaward of the MHTL), while the applicant's survey shows the seawall as ranging from eight to 25 feet landward of the MHTL and is completely on private land.

In a discussion with the State Lands Commission it was indicated that there is no valid information to show the exact location of the MHTL. While the assessor's parcel map shows the MHTL in a zig zag manner, this could be a surveyor's approximation of the MHTL for purposes of showing a lot line for the property. The applicant has indicated that the property ownership extends to the mean high tide line. In addition, the State Lands Commission indicated that any sovereign land seaward of the site has been granted to the City of San Diego. As such, the City acts as grantee to the State Lands and no permit from the State Lands Commission is necessary. As noted previously, there is a sandy beach area seaward of the proposed seawall. Part of the time this area is a shingle beach and at other times it is comprised of sand due to seasonal fluctuations. At very low tide, it is possible to walk along the rocky headlands which are seaward of the vista point to the south on Camino de la Costa. At high tide conditions, lateral access is not possible as the water line reaches the toe of the coastal bluffs and shoreline protection in the area. The City's certified La Jolla-La Jolla Shores LCP depicts this area as having limited or intermittent lateral access. The LCP further identifies that several unimproved dirt paths lead down from the improved vista point on Camino de la Costa (two to three lots south of the subject site) to a gentle sandstone outcropping to tidepool areas. This is regarded as the easiest natural access to the shoreline in this area.

The Commission will likely review more projects such as this which involve either repairs to, or replacement of, existing older seawalls. Many of these walls may presently encroach onto the public sandy beach. In the review of repairs to, or replacement of, older seawalls such as this, the seawall should incorporate the optimal design in terms of proper siting on the beach and should not encroach onto public sandy beaches or state tidelands. The issue with this particular project is to assure that the proposed repairs represent the least-environmentally damaging alternative and to determine whether or not the seawall should remain in its present alignment or be re-sited further inland.

While it cannot be determined with certainty whether or not the proposed seawall will encroach onto public lands it appears that since it is not possible to access the beach seaward of the property at high tide, that the beach is below the mean high tide and subject to the public trust in this location. In any event, the location of the wall can be found acceptable because the seawall is pre-existing and the proposed repair of the wall will not result in any further extension seaward of its present alignment. In addition, the proposed repairs to the existing seawall will not result in any greater impacts to public access than what presently exists since the location

of the wall remain the same. Existing public vertical access to the beach is available to the north at Mira Monte Place as well as Cortez Place, and two lots to the south at the aforementioned vista point on Camino de la Costa.

With regard to construction impacts, the applicant's engineer has indicated that the majority of the proposed work will involve the use of hand-held tools as opposed to large construction equipment. Approx. 240 cy. of excavation is proposed for removal of the existing footings and installation of the proposed vertical footings. The excavated sand will be placed on the beach and will be washed out with the ensuing high tide. The proposed amendment has been conditioned such that the applicant shall conduct the work outside of the summer beach season, and minimize the public area needed for staging and access corridors. Also, an advisory condition has been attached which requires that any excavated beach sand be redeposited on the beach and that no beach materials be used for construction purposes, etc. As conditioned, the Commission finds that the proposed work at this site will not result in any adverse impacts to public access and is consistent with the cited policies of the Coastal Act. Furthermore, as required in Section 30604(c) for development between the first public road and the sea, the project is found consistent with all other public access and recreation policies of the Act.

3. Visual Resources. Section 30251 of the Act calls for the protection of coastal scenic areas and views to and along the ocean; it also requires that new development be visually compatible with the character of the surrounding area. In the subject project, the repairs to an existing seawall are partly proposed to enhance the visual quality of the seawall and to improve the aesthetic qualities of the area. The existing wall is a collection of older seawalls composed of different materials, which do not represent a continuity in design. The newly proposed design will result in an improved appearance of the seawall in that it will incorporate texturing and coloring to blend in with the natural sandstone bluffs in the area. The seawall will appear more "natural" than a typical vertical concrete seawall.

The applicant's engineer has also indicated that the shotcrete will require maintenance during the life of the repaired wall. Special Condition No. 2 has been attached which requires that the seawall be constructed pursuant to the techniques outlined on the plans and geotechnical engineering report submitted with the application, assuring that the wall will be designed to incorporate surface treatments (e.g., air-placed concrete) that resembles the color (to be verified through submittal of a color board) and surface of the adjacent natural bluff areas. Also, the condition requires that the construction method and technology to be utilized for texturing and coloring the wall shall provide assurance that the seawall will closely match the adjacent natural bluffs in color and texture for the lifetime of the structure. In addition, final plans will be required which delineate the methods for maintenance of the air-placed concrete which shall be the responsibility of the applicant. The condition further requires that maintenance shall be conducted annually to assure that the air-placed concrete maintains its natural appearance. If at any time after the annual inspection it appears that any additional repair or maintenance is required, the applicant will need to contact the Commission office to determine whether additional coastal development permits will be

necessary. Therefore, as conditioned, the proposed project can be found consistent with Section 30251 of the Act.

4. Local Coastal Planning. Section 30604 (a) also requires that a coastal development permit or permit amendment shall be issued only if the Commission finds that the permitted development will not prejudice the ability of the local government to prepare a Local Coastal Program (LCP) in conformity with the provisions of Chapter 3 of the Coastal Act. In this case, as conditioned, such a finding can be made.

The project site is located within the City of San Diego's La Jolla Land Use Plan (LUP) which has been certified by the Commission. Among the LUP policies are the following:

> The placement of shoreline protective works should be permitted only when required to serve coastal-dependent uses or to protect existing principal structures or public beaches in danger of erosion and when designed to eliminate or mitigate adverse impacts on shoreline sand supply.
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> The placement of any necessary shoreline protective works should not be allowed to encroach on any area utilized by the public unless engineering studies indicate that minimal encroachment may be necessary to avoid significant adverse erosion conditions, and that no better alternatives exist. Any infilling between protective devices shall encroach no further seaward than adjacent functioning protective works.
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> New shoreline protective devices should be constructed and designed to be visually compatible in design, materials, and color with the existing natural environment.

The proposed project is consistent with all of the applicable LUP policies. However, this particular project warrants further discussion in terms of the segmentation of the review process which has occurred. Since the applicant is prposing to change the method of repair to an existing seawall, versus the demolition and reconstruction of the wall as originally permitted by the Commission, the existing CDP may be amended, as is proposed. As noted previously, within the City's LCP jurisdiction, new development is required to obtain a coastal development from the City. If that development is located within the Sensitive Coastal Resource overlay area of the certified LCP, as depicted on Map #C-713, in addition to the CDP, a Sensitive Coastal Resource (SCR) overlay permit is also required. The SCR overlay was drafted for purposes of protecting public beaches from erosion and adverse impacts on local shoreline sand supply, as well as protection of coastal bluffs and wetland areas. The SCR process ensures that development will maintain the geologic integrity of coastal bluffs, and provide for physical and visual public access to and along the shoreline.

In this case, the City has not required that the applicant obtain a separate SCR permit because the Commission is processing the coastal development permit

(CDP). However, Commission staff disagrees with the City's assessment and believes that the CDP establishes the SCR review process as independent of the coastal development permit review process, as are other discretionary approvals such as Hillside Review permits. In other words, the City should require an SCR permit for the subject proposal regardless of whether the Commission or City issues the CDP. An SCR permit is a separate discretionary permit. Usually when the City proceses a coastal development permit for a site that is within the SCR overlay zone, they process a CDP and SCR overlay permit concurrently, make separate findings, and combine the public hearings on the item. However, the Commission believes that if the CDP is not being done by the City, there is no reason why an SCR permit should not still be required through the City. The need for an SCR permit is triggered by whether or not the site is located within the SCR overlay, pursuant to Map #C-713, which is part of the City's certified LCP. Nevertheless, the City has indicated that they would be comfortable approving the subject project, if they would have to, in that the project would be consistent with the SCR overlay.

The Commission does not believe that this is the preferred process and that all any proposed development on a particular site should be reviewed under one permit process. This is especially true when it is known that future development may occur on the site. It is difficult to separate the review process when the issues of new development on a blufftop site as well as repairs to an existing seawall are interrelated.

One reason for concern regarding this matter is that, for example, in the review of development on blufftop lots, the SCR overlay requires that new development must observe a 40-foot setback from the bluff edge unless, through a site-specific geology report, it can be determined that a reduced setback of 25 feet may be permitted and will not adversely affect the geologic integrity of the coastal bluffs, etc. The Commission staff was initially concerned that because the site has shoreline protection, that any future development on the site might be permitted to observe a reduced setback. (The applicant has indicated that the existing residence on the site is proposed to be demolished and a new home will be constructed via a new coastal development permit from the City of San Diego). However, upon consultation with the City's geologist, it was indicated that if a particular site warrants shoreline protection, then it is implied that the site is not stable. If the site is not stable, the proposed development would not be eligible for a fifteen-foot encroachment into the mandated 40-foot setback.

In addition, staff asked the City geologist to determine how the bluff edge would be determined for a site such as the subject project, taking into consideration that the natural bluff has been significantly altered. The geologist indicated that the seawall would not be used for purposes of determining the bluff edge. The City would review historic photos before the site was developed and determine the original bluff edge based on where it was before grading on the site occurred. As such, whenever future development occurs on the subject site, the City will determine the bluff edge in this manner, and the proposed improvements to the seawall through the subject amendment to the coastal development permit should neither preclude the City

from making this analysis through a future CDP/SCR permit, nor adversely affect the required geologic setback that will be determined by the City at that time.

In summary, as noted previously, since the proposed improvements to the existing seawall will not result in any further encroachment on the beach, and the seawall represents pre-existing shoreline protection, the proposed development can be found consistent with the certified La Jolla-La Jolla Shores LCP Addendum. The Commission finds that project approval should not prejudice the ability of the City of San Diego to implement its certified LCP for the La Jolla area.

5. Consistency with the California Environmental Quality Act (CEQA). Section 13096 of the California Code of Regulations requires Commission approval of coastal development permits to be supported by a finding showing the permit, as conditioned, 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 amendment has been conditioned in order to be found consistent with the shoreline hazard and visual resource policies of the Coastal Act. Mitigation measures, including conditions addressing construction techniques and color of construction materials and timing of construction will minimize all adverse environmental impacts. As conditioned, 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 amendment is the least environmentally-damaging feasible alternative and can be found consistent with the requirements of the Coastal Act to conform to CEQA.

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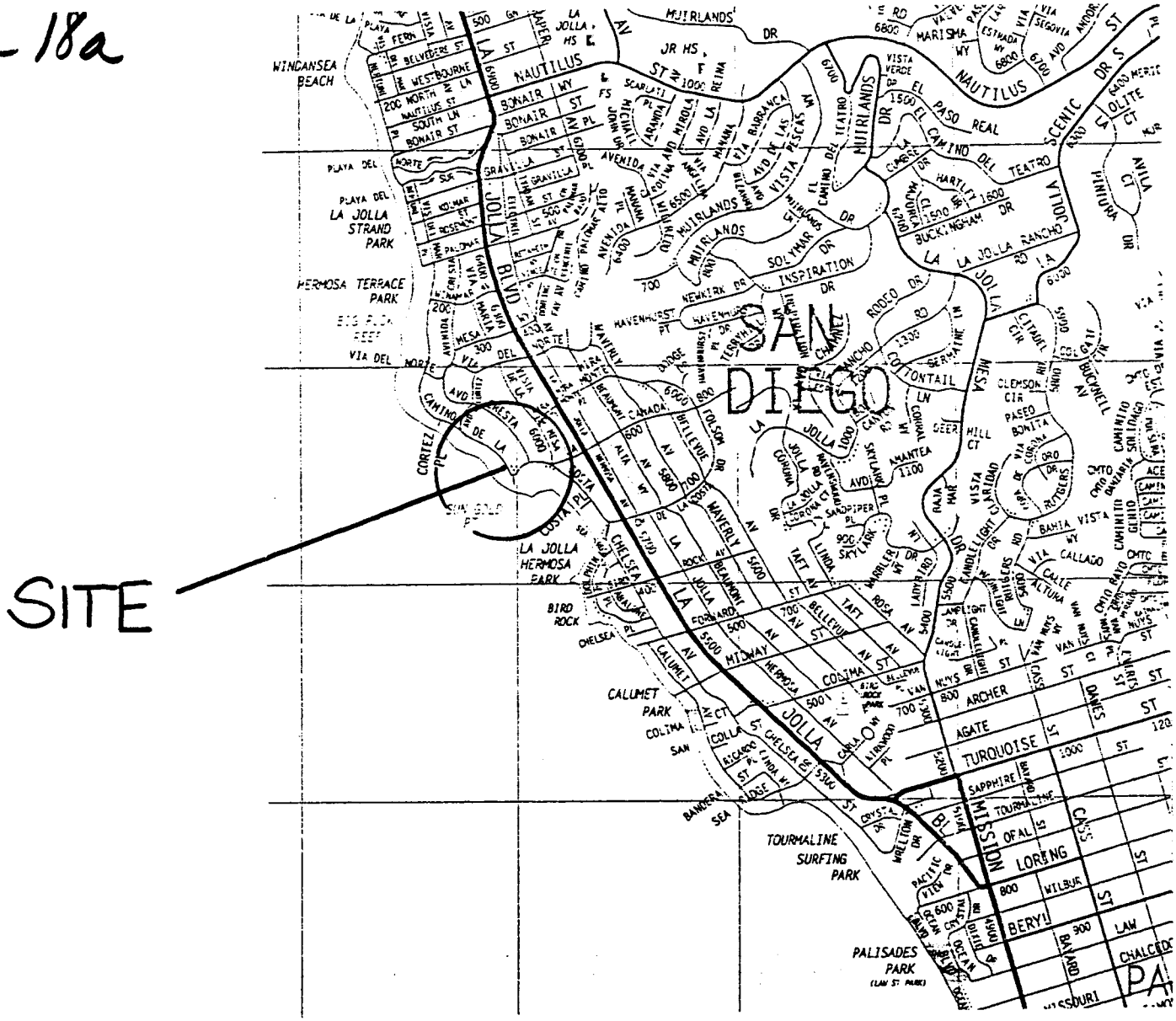


EXHIBIT NO. 1

APPLICATION NO. 6-84-408-A

Location Maps

California Coastal Commission

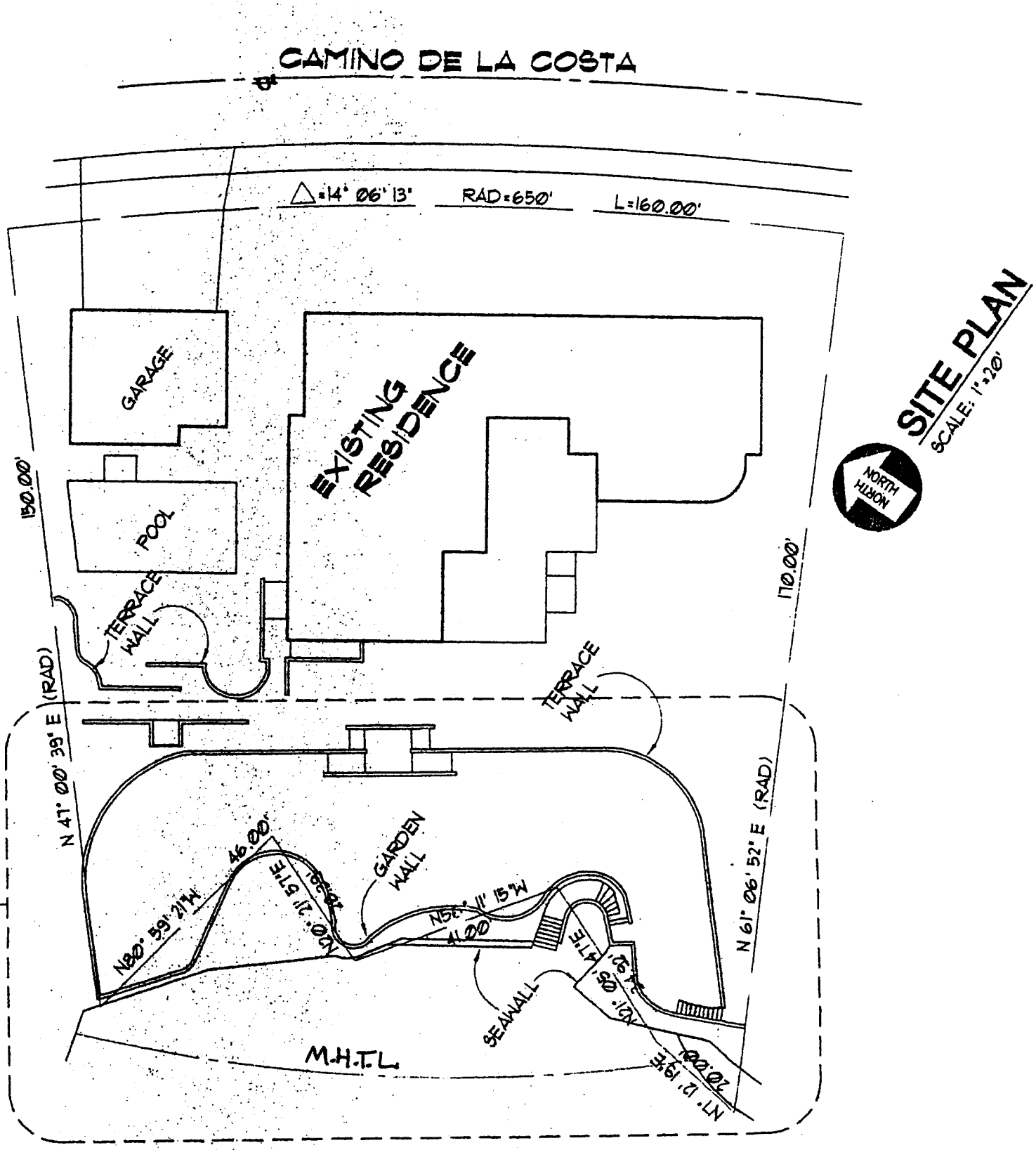
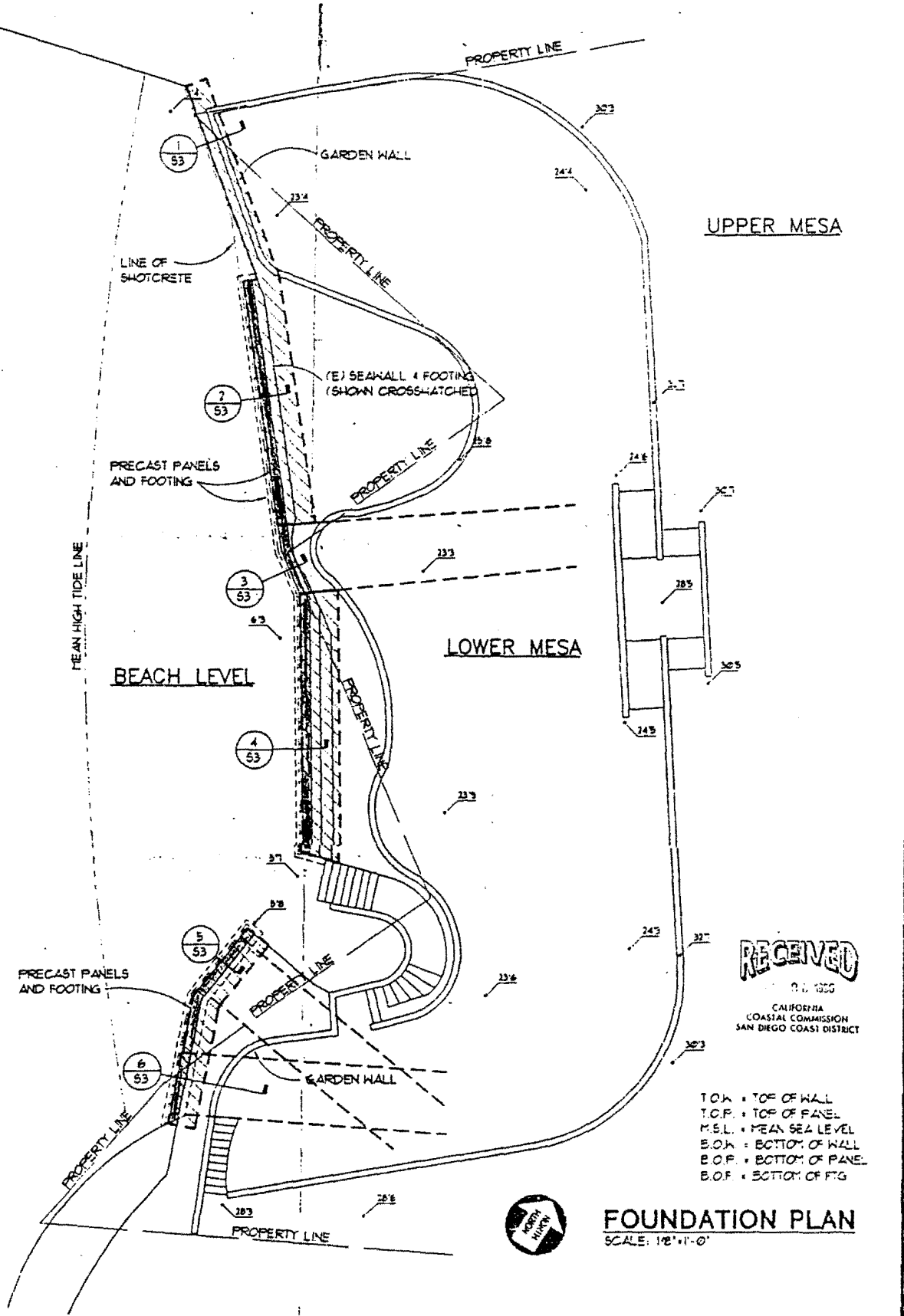


EXHIBIT NO. 2
APPLICATION NO. 6-84-408-A
Site Plan
California Coastal Commission



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CALIFORNIA COASTAL COMMISSION
SAN DIEGO COAST DISTRICT

T.O.W. = TOP OF WALL
T.O.P. = TOP OF PANEL
M.S.L. = MEAN SEA LEVEL
B.O.W. = BOTTOM OF WALL
B.O.P. = BOTTOM OF PANEL
B.O.F. = BOTTOM OF FTG

NORTH ARROW

FOUNDATION PLAN

SCALE: 1/8"=1'-0"

REGISTERED PROFESSIONAL ENGINEER
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EXP. 3-31-97
CIVIL
STATE OF CALIFORNIA

REGISTERED PROFESSIONAL ENGINEER
DAVID W. SKELLY
No. C 47857
EXP. 12/98

NOWAK-MEULMESTER & ASSOCIATES
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Project Address:
6016 CAMINO DE LA COSTA
LA JOLLA, CA. 92037

Project Name:
CAMINO DE LA COSTA SEAWALL IMPROVEMENTS
JOB # 96-004

Revision 14:
Revision 13:
Revision 12:
Revision 11:
Revision 10:
Revision 9:
Revision 8:
Revision 7:
Revision 6:
Revision 5:
Revision 4:
Revision 3:
Revision 2:
Revision 1:

Original Date

Sheet (Title): FOUNDATION PLAN
WALL SECTIONS

Sheet 3 of THREE

EXHIBIT NO. 3
APPLICATION NO. 6-84-468-A
Site Plan for Seawall
California Coastal Commission

with epoxy coated steel and corrosion resistant concrete, and tied back into the bluff near the top of the wall. None of the walls are constructed in this fashion. In particular:

Wall #1, (North West Wall, approx. 25 feet length). This wall was built in 1984 and is in fair condition. The wall was not constructed with drainage and is not founded into the bedrock. The footing rests on top of the bedrock. The wall is not tied into the bluff. The recommended repairs to extend the life of the wall are: 1. Drill tieback anchors and drainage holes. Change the footing of the wall to extend into the bedrock.

Wall #2, (North Central Wall, approx. 28 feet length). This wall was built in 1985 and is in fair condition. The reentrant feature is showing signs of deterioration of the structural steel. The wall has been flanked by the ocean on the southern end. Wave uprush has scoured the southern end and the bluff has scoured behind the wall. The drains are working but need to be cleaned. The end of the wall needs to be protected from out flanking. The base of the wall needs to be reinforced.

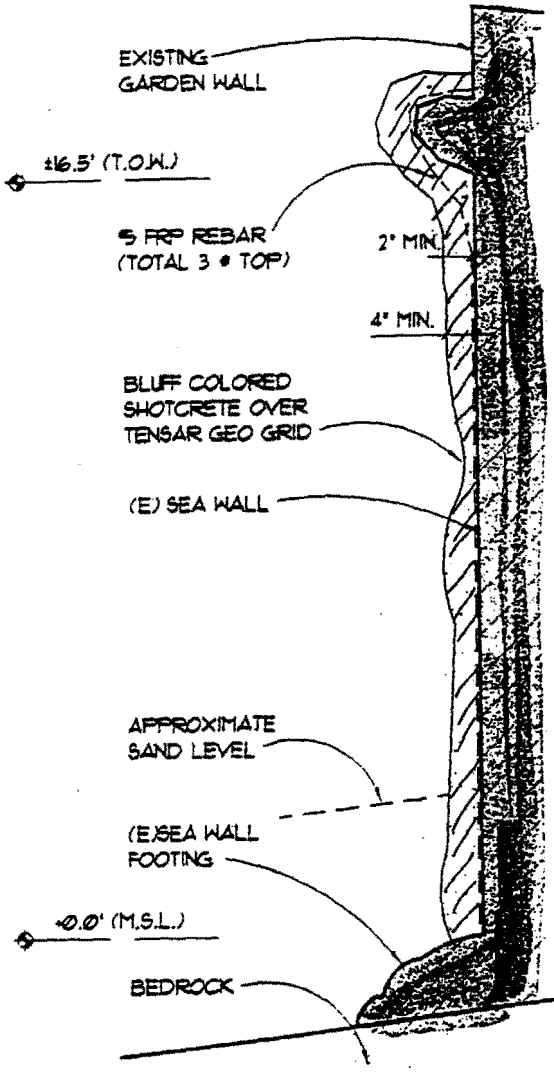
Bare Bluff. There is a bare section of bluff between Wall #2 and Wall #3 (approx. 10 feet length) that has been undercut and is in jeopardy of failing. This would result in the loss of the garden wall on top of the bluff. This section of bluff needs to be protected at the base.

Wall #3, (Central Wall, approx 24 feet length). This wall is a cast in place concrete wall of unknown age, but according to historical photographs was built prior to 1928. The wall is in poor to failing condition. There is a large vertical crack extending down the middle of the wall. There are no drains in the wall. A brick wall, constructed on top of this wall, has failed and has allowed this section of seawall to be overtopped. The bluff is still being undercut behind the wall. The base of the wall shows extensive scour from cobbles.

Wall #4, (Stairway Wall, approx. 30 feet length). This wall makes up the stair well. The wall is of unknown age and most likely built when Wall #3 was built. The wall is in poor condition. There are no drains in this area. The wall has been undercut and scoured at the base. The stairway has a large hole in one step and has exposed steel in several locations.

Wall #5, (South Wall, approx. 25 feet length). This wall is constructed of masonry block and is of unknown age. The wall is in poor condition. The wall has been severely undercut (approx. 1

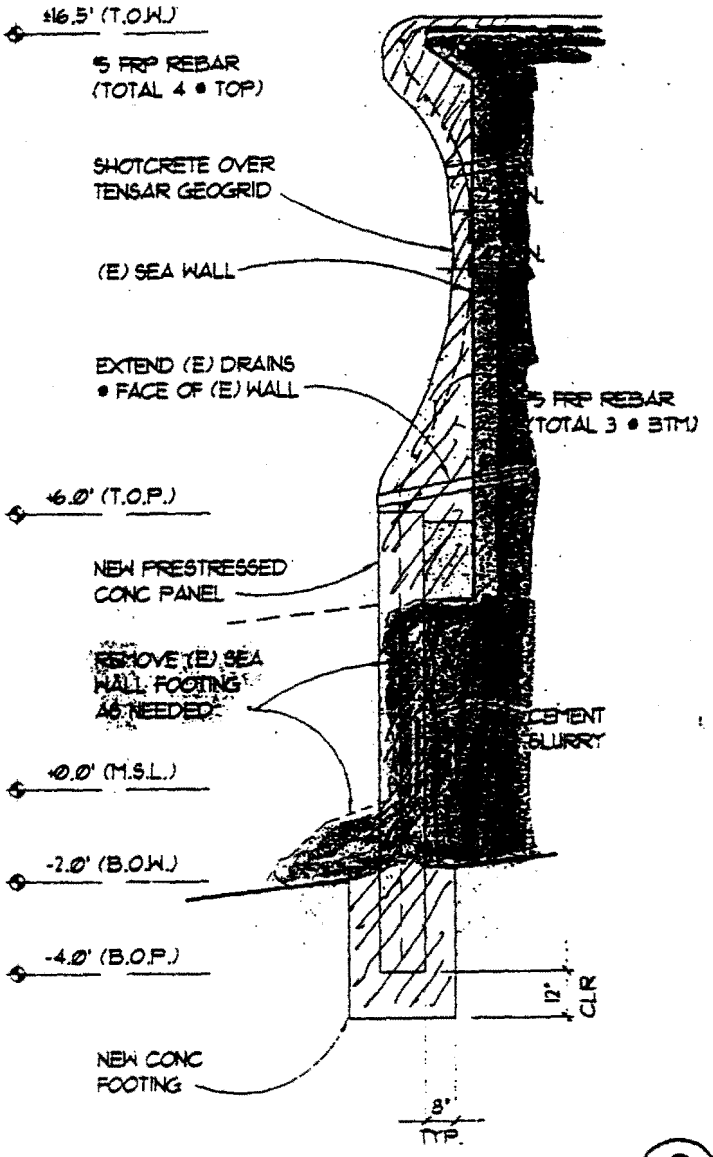
619 S. VULCAN AVE, #214B ENCINITAS, CA 92024 PHONE/FAX 619 942-8379



EXISTING SEAWALL PROFILE VARIES DASHED LINE SHOWS MAXIMUM SEAWARD EXTENT AND APPROXIMATE ORIGINAL FOOT PRINT. SOLID LINE SHOWS MAXIMUM LANDWARD EROSION

SEAWALL REINFORCEMENT AND FACADE (NEW) PORTIONS OF EXISTING FOOTINGS TO BE REMOVED

1



2

EXHIBIT NO. 5
APPLICATION NO. 6-84-408-A
Seawall sections
California Coastal Commission

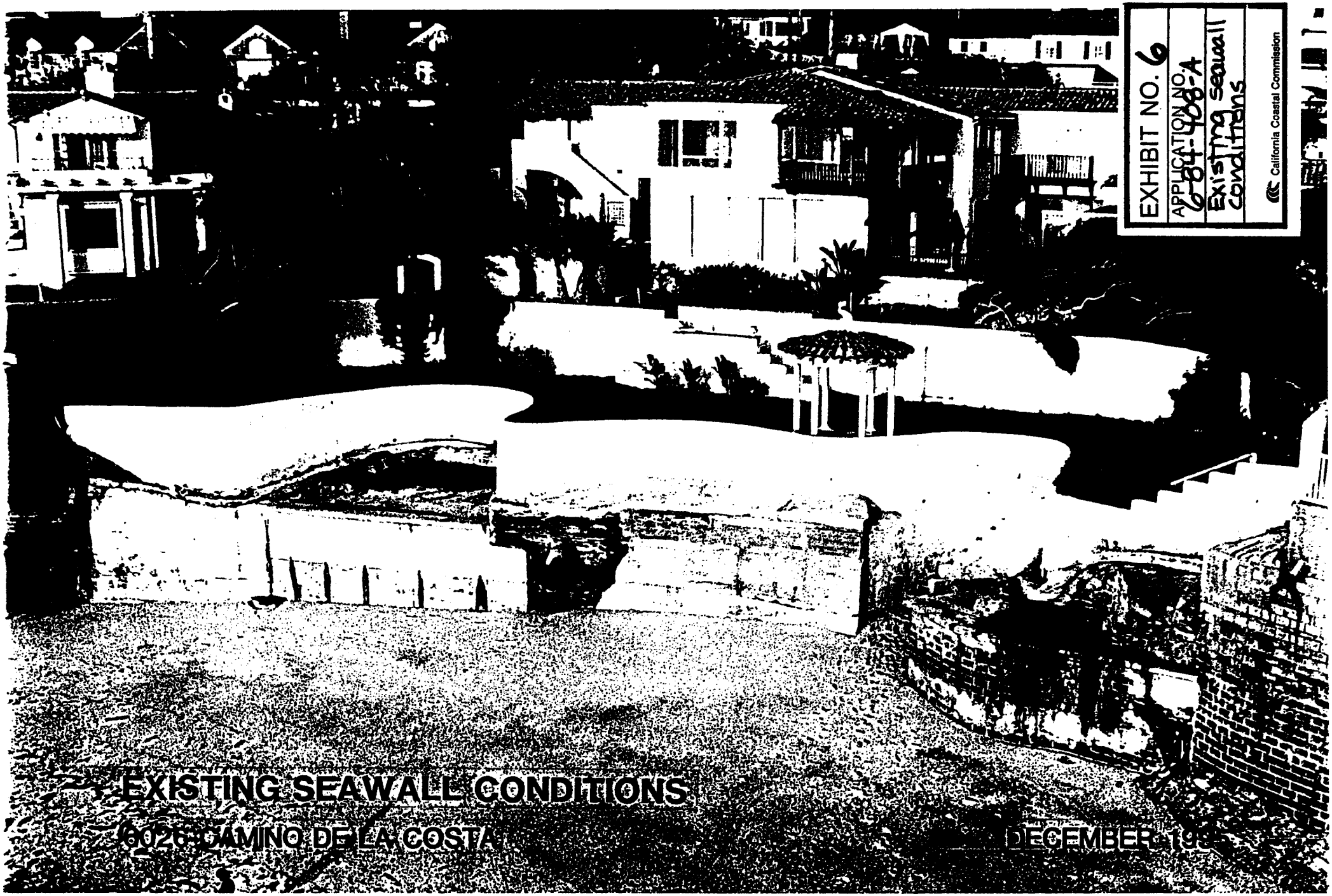
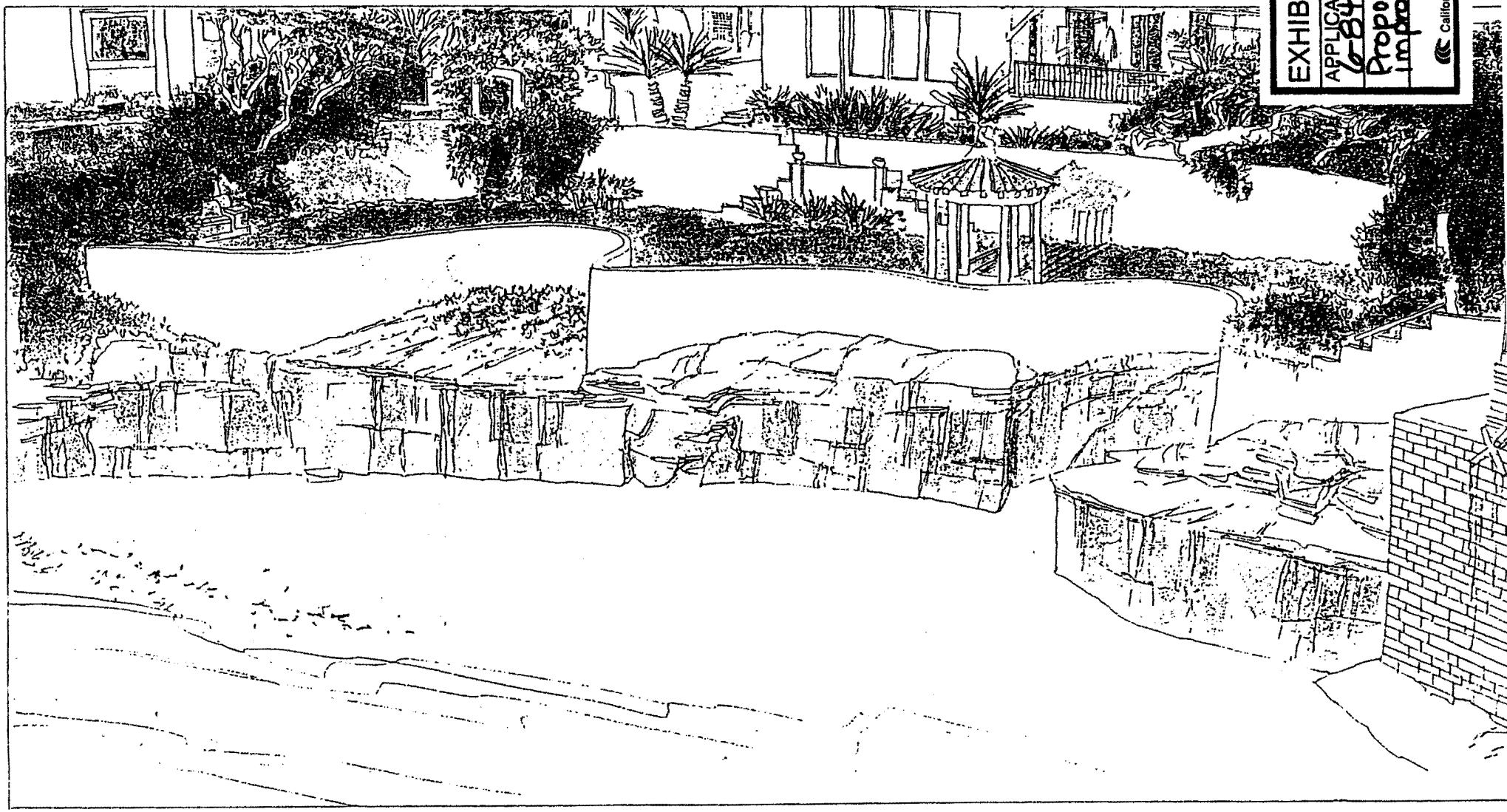


EXHIBIT NO. 6
APPLICATION NO. 4-84-684-A
Existing seawall conditions
California Coastal Commission



PROPOSED SEAWALL IMPROVEMENTS

6026 CAMINO DE LA COSTA

CDP No. 6-84-