CALIFORNIA COASTAL COMMISSION

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Staff Report:

July 24, 1996

Hearing Date: August 13-16, 1996

REGULAR CALENDAR STAFF REPORT AND PRELIMINARY RECOMMENDATION

Application No.:

6-96-45

Applicant:

City of San Diego

Metropolitan Wastewater Dept.

Agent: Tim Daly

Description:

Construction of shoreline protection works including a rock revetment at the base of the bluff and a 30 foot-high, 176 foot-wide, tied-back shotcrete wall on the upper bluff, the installation of a 24-inch pipeline storm drain system and the construction of a 100 space parking area at an adjacent vacant, 4.2 site to the north. Grading for the proposals will involve approximately 6,037 cubic yards of cut and approximately 7,427

cubic yards of fill.

Site:

Point Loma Wastewater Treatment Plant (PLWTP), 1902 Gatchell Road, Peninsula, San Diego, San Diego County. (APN 532-520-06)

Substantive File Documents: Environmental Impact Report - PLWTP, Revised February 23, 1995; Final Preliminary Report - North Shoreline Protection Improvements for PLWTP, July 3, 1995; and Limited Geotechnical Investigation for Navy Property Improvements at PLWTP, February 15, 1996.

STAFF NOTES:

Summary of Staff's Preliminary Recommendation:

Staff is recommending approval of the proposed development subject to special conditions requiring applicant's acknowledgement that future protective works for the proposed parking area will not be permitted and submission of a revised grading plan for the parking area increasing the setbacks of development from the bluff edge. Other conditions address potential requirements for State Lands or other state or federal permits. execution of a hold harmless agreement and compliance with identified mitigation measures addressing paleontological resources. The major issues involved in the development include potential impacts to visual resources, public access, paleontological resources, shoreline erosion and bluff stability.

PRELIMINARY STAFF RECOMMENDATION:

The staff recommends the Commission adopt the following resolution:

I. Approval with Conditions.

The Commission hereby grants a permit for the proposed development, subject to the conditions below, 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.

See attached page.

III. Special Conditions.

The permit is subject to the following conditions:

- 1. <u>Waiver of Future Shoreline Stabilization</u>. The permittee shall not construct shoreline stabilization projects along the shoreline west of the 4.2-acre North Parking Facility site, as shown on exhibit 2, to protect the proposed parking area. Any proposed development at this location which becomes threatened in the future is considered expendable and shall be removed.
- 2. <u>Revised Plans</u>. Prior to the issuance of the coastal development permit, the permittee shall submit for the Executive Director's review and written approval the following revised project plans:
 - a. Revised grading and construction plan which shall indicate that no development at the North Parking Facility will occur seaward of the 50-year bluff-retreat line as identified on the "50 to 75 Year Bluff Retreat Line" Map dated July 10, 1996.
 - b. A detailed landscape plan for the North Parking Facility that indicates the type, size, extent and location of all plant materials, the proposed irrigation system and other landscape features. Drought tolerant and California species native to the San Diego coastline shall be utilized to the maximum extent feasible. Said plan shall include a planting schedule that indicates that an interim planting plan shall be implemented within 60 days of completion of grading.
- 3. <u>Paleontology</u>. The applicant shall comply with the mitigation measures identified by the City of San Diego in the certified Environmental Impact Report regarding paleontological resources. Any changes to the required mitigation shall be promptly reported to the Executive Director and may require an amendment to the coastal development permit.

- 4. <u>Public Rights.</u> The permittee shall, by accepting the terms and conditions of this permit, agree that issuance of the permit and completion of the authorized development shall not prejudice any subsequent assertion of public rights, e.g., prescriptive rights, public trust, etc.
- 5. <u>Waiver of Liability</u>. Prior to the issuance of the coastal development permit, the applicants 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, operation, maintenance, existence, or failure of the permitted project.
- 6. Other Permits. The applicant shall submit copies of all other required state or federal discretionary permits for the development herein approved. Any mitigation measures or other changes to the project required through said permits shall be reported to the Executive Director and shall become part of the project. Such modifications, if any, may require an amendment to this permit or a sepearate coastal development permit.

IV. Findings and Declarations.

The Commission finds and declares as follows:

1. Detailed Project Description. The proposed development consists of the reinforcement of an approximately 100 foot-wide cove by placing 4,500 tons of rip-rap at the base of the coastal bluff to arrest continuing marine erosion, and the construction of a 30-foot-high, 176-foot-wide, reinforced shotcrete tied-back wall to increase stability of the upper bluff. The tied-back wall will also feature 12-and 22-foot-wide retaining walls on each end and include multiple perch/roosting structures over its surface. These shoreline protection devices will be located seaward of the existing paint warehouse and Odor Removal System No. 6 for the Point Loma Wastewater Treatment Plant (PLWTP). Also proposed is the installation of a 24-inch diameter storm drain system to disperse runoff from the upper bluff and the southern portion of the proposed parking area. In addition, the project includes the grading, paving, striping and landscaping of a currently-disturbed, approximately 4.2 acre site north of the cove. This site will used foremployee parking and as a staging area for on-going PLWTP construction activities. Grading for the proposed developments will involve approximately 6,037 cubic yards of cut, approximately 7,427 cubic yards of fill requiring approximately 1,390 cubic yards of import. Import material will be acquired onsite from ongoing construction activity at PLWTP.

The project sites are located at the north end of the PLWTP. The PLWTP is located at the southern end of the Point Loma peninsula in the City of San Diego. The facility provides sewage treatment for the City of San Diego and 14 other local jurisdictions. Cabrillo National Monument is located to the south of the plant and the U.S. Navy owns land to the north and the east. The Pacific Ocean lies directly west of the project site.

2. <u>Geologic Hazards/Shoreline Erosion</u>. Section 30235 of the Act states, in part, that:

Revetments, breakwaters, groins, harbor channels, seawalls, cliff retaining walls, and other such construction that alters natural shoreline processes shall be permitted when required to serve coastal-dependent uses or 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, 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, 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 project sites are part of a large blufftop property, located near the southern end of Point Loma, just north of lands owned by Cabrillo National Monument. The original PLWTP facility was constructed in the 1960s, predating the Coastal Commission by several years. Since then, many improvements and expansions of the facility have gained Commission approval, as regional growth has demanded larger and improved sewage treatment. In 1989, after it was determined that coastal erosion threatened the PLWWTP, the Commission approved Coastal Development Permit #6-89-217, for extensive shoreline stabilization. This included augmentation of existing rip-rap, seawall repair and new construction, and repair of previously-filled sea caves, among other things.

The proposed development consists, generally, of two distinct projects. The first involves the installation of a rock revetment at the base of an existing bluff at the back (east side) of a small cove and a construction of a tied-back shotcrete wall on the upper bluff (see exhibit #2 for location), at a location north of the previously approved shoreline stabilization projects. The second project is the construction of a 100 space parking lot and construction storage and staging area to be located on the north side of PLWTP and north of the proposed shoreline stabilization projects.

The first phase of the development at the cove involves the lowering of a bulldozer by crane to the shingle beach. The bulldozer will push approximately 2,000 cubic yards of beach materials seaward into the inter-tidal zone. A crane will then be used to place 4,500 tons of 8-ton rip-rap at the base of the bluff. The bulldozer will then cover the rip-rap with the 2,000 cubic yards of beach materials. All work will be limited to an area approximately 40 feet landward of surf grass beds.

The second phase of the cove development involves the installation of the Approximately 1,100 cubic yards of sand-sized materials will tied-back wall. be excavated from the bluff face to create a 12-foot-wide bench that will form the footing for the upper bluff retaining wall. A free-form, 30-foot-high, 210-foot-wide, tied-back structural wall, which will be carved and shaped to conform with the natural geologic landform, will then be installed to stabilize the upper bluff. The wall will extend from the Point Loma formation contact to the top of the bluff, protecting both the terrace deposits and the existing overlying fill soils. A chemical stain will be used to provide a mottled natural appearance similar in color to the adjacent rock. will be very similar to those previously approved by the Commission at sites south of the proposed development within the PLWTP. In addition, a 24 inch diameter pipeline storm drain will be installed under the tied-back wall to permit runoff from the PLWTP to bypass the blufftop and discharge over the proposed rock revetment. This storm drain pipeline will replace an existing storm drain which has collapsed due to upper bluff failure.

Section 30235 of the Act permits construction of revetments and retaining walls when required to protect existing structures. The proposed project is intended to stabilize a limited area of ongoing coastal erosion along the northern boundary of the PLWTP. The corrective measures are proposed to ensure accessibility and continued operations of the PLWTP's maintenance/paint warehouse structures and Odor Removal System No. 6. Due to the constrained nature of operations at PLWTP, the asphalt area near the edge of the seaward slope serves as the only access into the plant's sheet metal maintenance and paint warehouse buildings. These plant facilities lie within 8 feet from the edge of the threatened slope.

Prior to grading for development of the plant in the early 1960's, this area sloped toward the bluff-top at a relatively gentle gradient of 12 percent. Subsequently, upwards of 20 feet of fill was placed on the site to create a more level topography. The geotechnical report prepared for the subject project indicates that the rate of marine erosion in this area above the cove is approximately 0.33 feet per year. In the ensuing 30 years since the plant was constructed, upwards of 10 feet of marine erosion has been estimated to have occurred at the subject site. The report further indicates that during the same time period, "combined marine and subaerial processes have significantly undermined, steepened and eroded the face of the original fill slope, leaving what is today a marginally stable, approximately 20-foot-tall fill slope." An existing storm drain which exits near the site has collasped due to ongoing upper bluff erosion. The existing development which has been identified as requiring protection lies within 8 feet from the edge of the threatened fill slope. The western boundary of the access pavement for the facilities is the fill slope's seaward edge. The geotechnical report indicates that the fill slope has become progressively less stable and will eventually fail, "possibly taking upwards of 10 to 15 feet of bluff-top improvements." The report also indicates that the rapidity of the failure which could occur would pose a life-safety threat to anyone in the vicinity.

The North Shoreline Protection Improvement, Final Preliminary Report, dated July 3, 1995, examined seven alternatives for upper bluff stabilization. Some of the alternatives involved the removal of the upper 20 feet of artificial

fill resulting in a substantial loss of usable bluff-top surface and the removal of structures the City now proposes to retain. Due to the limited existing usable space available for plant operations at PLWTP, this alternative was not feasible. The tied-back shotcrete wall alternative was chosen because it preserved the existing development at the top of the bluff, has an expected "service life" in excess of 100 years and will be visually compatible with the previously approved stabilization walls to the south.

The second project proposed under this application is the construction of a 100 space parking lot and construction staging area. The approximately 4.2-acre site is located directly north of the existing northern boundary of the PLWTP and, therefore, directly north of the proposed shoreline protection devices. The property is in the process of being transferred to City ownership from the U.S. Navy. The City has had an on-going lease arrangement with the Navy for use of the property for construction staging and parking for the past several years. Approximately 3/4 of the eastern portion of the site is highly disturbed, has been graded and has no vegetation. The remaining northern and western portion of the site is covered with ice plant and other invasive species. The applicants propose to grade and recontour the existing site to blend into the natural coastal setting, construct a 100 space asphalt parking area in the southwest corner and landscape the site with native vegetation. The grading and construction plans submitted with the application indicate that the toe of the proposed graded slope for the parking lot will at some points lie within 2 feet from the edge of the bluff. This proximity to to the bluff is inconsistent with Section 30253 of the Act which prohibits new development which would in any way require the construction of protective devices. The applicants have proposed a redesign of their proposal to conform to Section 30253 and will revise their plans to ensure that development will not occur closer than 10 feet from the edge of the bluff. This 10-feet location conforms to the 50 year retreat line projected for the site by the "50 to 75 Year Bluff Retreat Line" map submitted by applicant's geologist. Since the revised plans have not yet been received by the Commission, condition #2(a) has been attached. This condition requires the applicant to submit revised plans for the parking lot and construction staging area indicating that no development will encroach beyond the 50-year bluff retreat lines as identified on the "50 to 75 Year Bluff Retreat Line" map submitted to the Commission on July 10, 1996.

As indicated above, Section 30253 of the Act provides that new development not require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs. The "50 to 75 Year Bluff Retreat Line" map submitted with the application indicates the parking area could be subject to bluff failure within 50 years. However, the applicants have stated they do not consider the proposed parking lot a "principal structure" and will not seek protection for it in the future. Condition #1 assures that development is consistent with Section 30253 in that the applicants agree to not request the construction of protective devices in the future in the event the parking area is undermined. In addition, if any of the permitted north parking facility site is threatened by future coastal erosion, the applicants agree to remove those threatened sections.

Section 30253 requires that new development minimize risks to life and property. The subject site is located in a hazardous area as evidenced by the past damage from storms and the applicant's desire to protect the existing development. Although the presence of a revetment will substantially reduce the possibility of future damage, it will in no way eliminate such danger. Even with shoreline protection, there remains an inherent risk in any development along the shoreline. Therefore, the attached Special Condition #6 requires the applicant to sign a document which limits the Commission's liability in permitting the development.

The nature of the PLWTP facility is such that relocation of the plant is not a feasible alternative. The plant is essentially built-out within the existing property area and any vacant land has already been designated to future expansion of wastewater treatment needs. The City has made a substantial commitment of resources to this location and seeks to secure all existing developed area from the effects of coastal erosion. As conditioned, the project has been designed to mimimize impacts on natural shoreline processes; improve storm drain runoff; will neither create nor contribute significantly to increased erosion or geologic instability; will not adversely affect public access opportunities; and waives liability on the part of the Commission consistent with Sections 30235 and 30253 of the Coastal Act.

3. Marine Resources. Coastal Act Section 30230 provides that:

Marine resources shall be maintained, enhanced, and where feasible, restored. Special protection shall be given to areas and species of special biological or economic significance. Uses of the marine environment shall be carried out in a manner that will sustain the biological productivity of coastal waters and that will maintain healthy populations of all species of marine organisms adequate for long-term commercial, recreational, scientific, and educational purposes.

In addition, Section 30231 provides that:

The biological productivity and the quality of coastal waters, ... 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, ... encouraging waste water reclamation,

The shoreline protection measures including the rock revetment at the base of the bluff and the tied-back wall near the top, will not negatively impact the subtidal and intertidal habitat of the cove. All construction activity will take place landward of surf grass found in the intertidal zone. Tidepools, which are prominent features to the south of the proposed development, do not exist within the cove area itself. In addition, the EIR for the subject development has identified only temporary impacts to marine habitat and species during the installation of the shoreline protection devices. These include increased erosion/sedimentation, noise and human activity. The increased erosion and sedimentation impacts to the intertidal area will be temporary in nature since the site is within an existing high energy surf zone

and the material will be washed away. Wildlife and marine mammals may temporary avoid the area during construction.

The existing steep cliffsides of the project site do not offer good roosting locations and no direct impacts are anticipated to wildlife including the California brown pelican, Brandt's cormorant or other shore birds. The EIR does indicate that temporary impacts due to construction noise may affect roosting activity north of the site. These impacts seem minimal and temporary since construction activity is limited to daytime hours when most birds are typically away from the roosting areas. In addition, the proposed upper bluff stabilization wall has been designed to include numerous ledges for roosting of seabirds; thus, the project will ultimately expand the existing habitat area further south of the subject site. Since the proposed project does not permanently impact the subtidal or intertidal habitat area, is temporary in nature and will, upon completion, increase the roosting potential for shore birds at this location, the Commission finds the proposed development to be consistent with Sections 30230 and 30231 of the Act.

4. Visual Resources. Section 30251 of the 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....

The proposed project includes the construction of a tied-back shotcrete wall, a rock revetment and a 100 space parking lot. The projects face west toward the Pacific Ocean and will be visible from off-shore ships and boats. Although portions of the PLWTP site are visible from the adjacent Cabrillo National Monument, none of the proposed improvements will be visible from the Monument or the public parking lots and tidepools south of the site. In order to reduce the adverse visual impacts of the tied-back wall to viewers from offshore ships and boats, the applicants propose to use materials and colors which are coordinated with the surrounding bluff face. Although, as an at-grade improvement, the parking lot will not be significantly visible from offshore, the applicant has indicated the use of landscaping to further soften the effects of the parking/construction staging area. Since a landscaping plan for the parking/construction staging area was not included with the project plans, condition #2(b) has been attached requiring the submission of a landscaping plan which utilizes drought tolerant, California species native to the San Diego coastline. This would reduce the visual aspects of the parking lot and maintain the natural vegetation characteristics found to the north and south of the project site. The project, as conditioned, is therefore consistent with Section 30251 of the Coastal Act.

5. Paleontological Resources. Section 30244 of the Act states that:

Where development would adversely impact archaeological or paleontological resources as identified by the State Historic Preservation Officer, reasonable mitigation measures shall be required.

The geologic units in the project area include a unique sequence of Quaternary alluvial, nearshore marine, and marine terrace deposits and Cretaceous marine shales and sandstones. Two formations are found in the vicinity of the project site: the Point Loma Formation and the Unnamed Marine Terrace Deposits. The upper bluff stabilization and rip-rap installation will impact both the Point Loma Formation and the Unnamed Marine Terrace Deposits. The parking lot area will impact existing artificial fill placed in the early 1960's and Unnamed Marine Terrace Deposits. These formations consist of well-preserved remains of many types of fossil marine invertebrates and vertebrates including clams, snails, rays and sharks. According to the EIR for the subject development, the paleontological resources of the Point Loma Formation represent some of the best preserved examples of the late Cretaceous marine fossils known from California and one of the few sources of dinosaur fossils in the state. In addition, the San Diego Natural History Museum has collected monosaur remains (extinct marine reptiles) from the Point Loma Formation less than one mile north of the project site. These exposures are similar to those in the project area, thus suggesting the potential for such occurrences on the project site.

The EIR suggests the implementation of mitigation measures, including a monitoring program, in order to protect any paleontological resources from the potential of significant adverse impacts. With the attached condition requiring compliance with all the mitigation measures identified by the EIR, the proposed project is consistent with Section 30244 of the Coastal Act.

6. Shoreline Access. Section 30211 of the Act provides that:

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 sand and rocky coastal beaches to the first line of terrestrial vegetation.

In addition, Section 30212 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:
 - (1) it is inconsistent with public safety, military security needs, or the protection of fragile coastal resources,
 - (2) adequate access exists nearby, ...

The proposed development fronts on the Pacific Ocean. Currently, there is no public access to the shoreline at the project site. The shoreline presently consists of rocky headlands interspersed with the previously constructed revetments. Due to the revetments and the rocky headlands, lateral access opportunities have been relatively non-existent at the subject site since the time of plant construction. Also, due to the nature of the sewage treatment facility, public use of the area is restricted for safety reasons. With construction of the revetment and upper bluff stabilization, lateral access opportunities along the project shoreline will not be diminished beyond those that currently exist.

Additionally, to the north of the project site are Navy owned lands wherein public access along the shoreline is prohibited. To the south is the Cabrillo National Monument which encourages public access to the tip and westerly side of Point Loma. Parking lots and shoreline viewing areas are available at the Monument and along the access road south of the treatment plant facility, but only limited access to the shoreline is allowed because of the sensitive marine resources found at the base of the bluffs. The Monument offers guided tours of the tide pools, which does allow the public the opportunity to view inter- and sub-tidal marine life.

For this project site only, it is inappropriate to require public access along the shoreline due to the construction of the revetment which encompasses the entire beach zone (rocky, cobble beach) to the inter-tidal zone. With the addition of conditions #4 and #7 which address existing public rights and potential permit requirements from state or federal agencies, any existing public right to access this site will remain unaffected. Moreover, adequate access is available at the adjacent Cabrillo National Monument. Therefore, the proposed project, as conditioned, is consistent with Sections 30211 and 30212 of the Coastal Act.

7. Local Coastal Planning. Section 30604 (a) also requires that a coastal development permit 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, such a finding can be made.

The subject site is located within an unzoned geographic area included in the Peninsula Community Plan segment of the City of San Diego Local Coastal Program and has contained the Point Loma Wastewater/Sewage Treatment Plant since 1963. This area was not included in the City of San Diego's certified Local Coastal Program, and the Commission retains permit jurisdiction over the site at this time. Pursuant to the above findings, the proposed development will be consistent with all applicable policies of Chapter 3 of the Coastal Act. Therefore, as conditioned, project approval should not result in adverse impacts to coastal resources nor prejudice the City's ability to implement its certified LCP.

8. Consistency with the California Environmental Quality Act (CEQA). Section 13096 of the Commission's 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.

As discussed herein, the proposed project, as conditioned, will not cause significant adverse impacts to the environment. Specifically, the project, as conditioned, has been found consistent with the marine, visual and paleontological resources, public access and geologic hazard policies of the

Coastal Act. 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 project is the least environmentally-damaging feasible alternative and can be found consistent with the requirements of the Coastal Act to conform to CEQA.

STANDARD CONDITIONS:

- 1. Notice of Receipt and Acknowledgement. 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.

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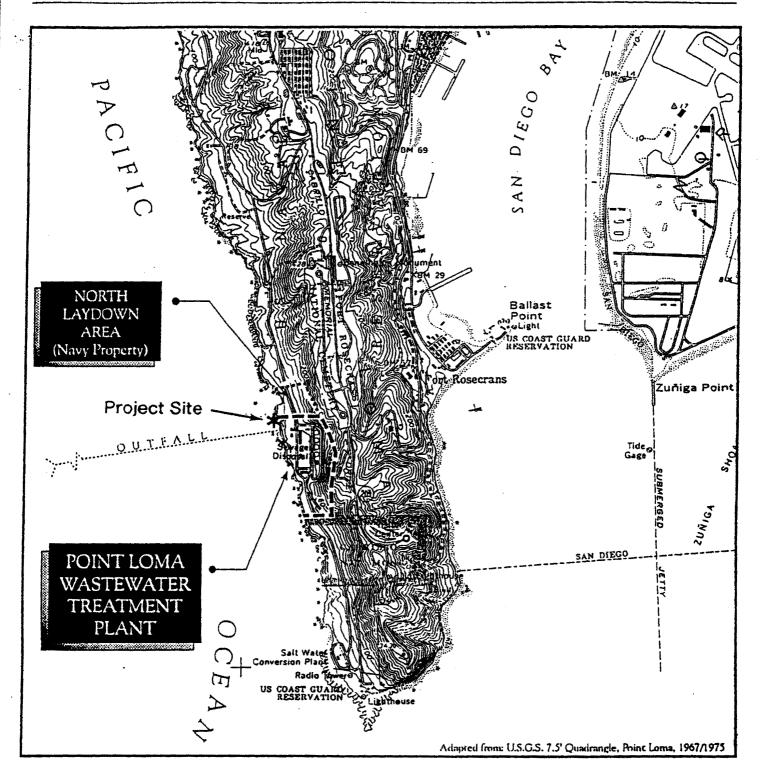


EXHIBIT NO. 1

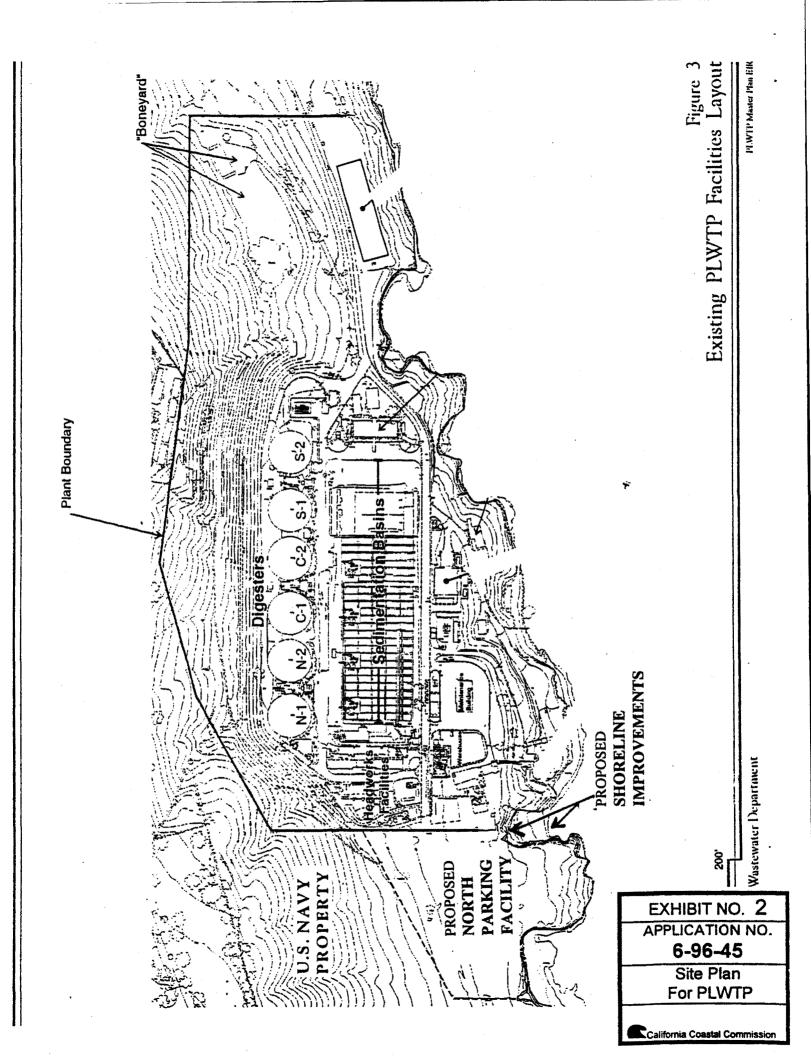
APPLICATION NO.
6-96-45

Location Map

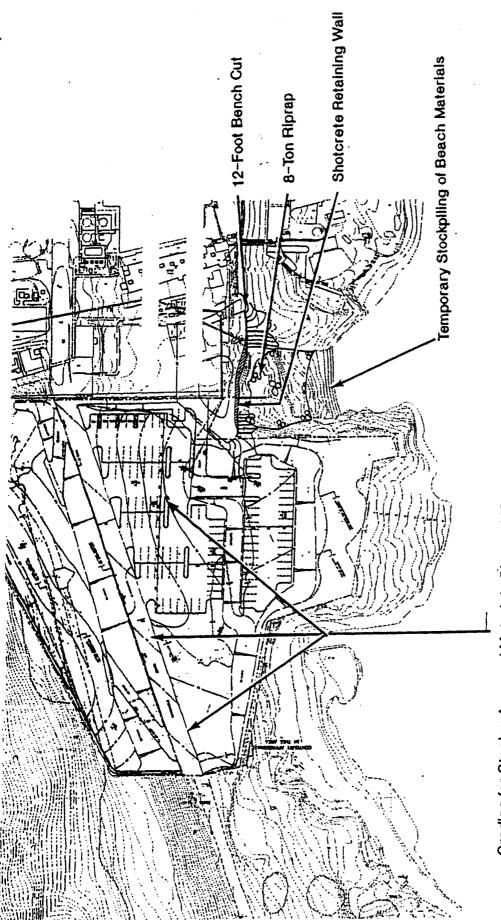
California Coastal Commission



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North Shore Protection Improvements - Site Plan



Grading for Staging Area and Materials Disposal/Stockpiling Northern Parking Facility

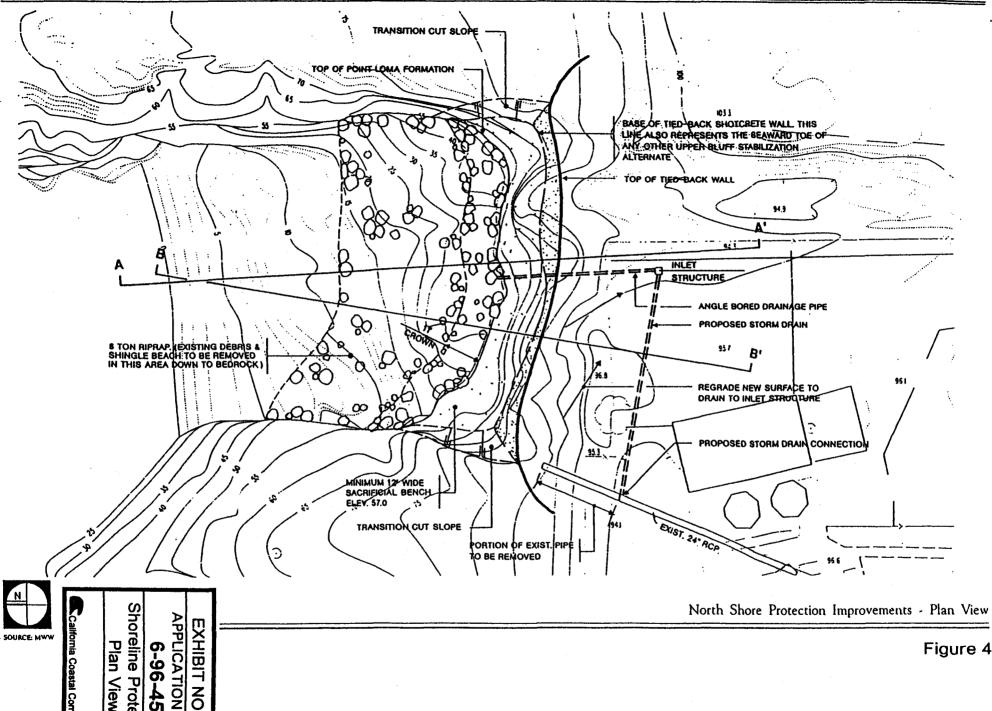
EXHIBIT NO. 3

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6-96-45

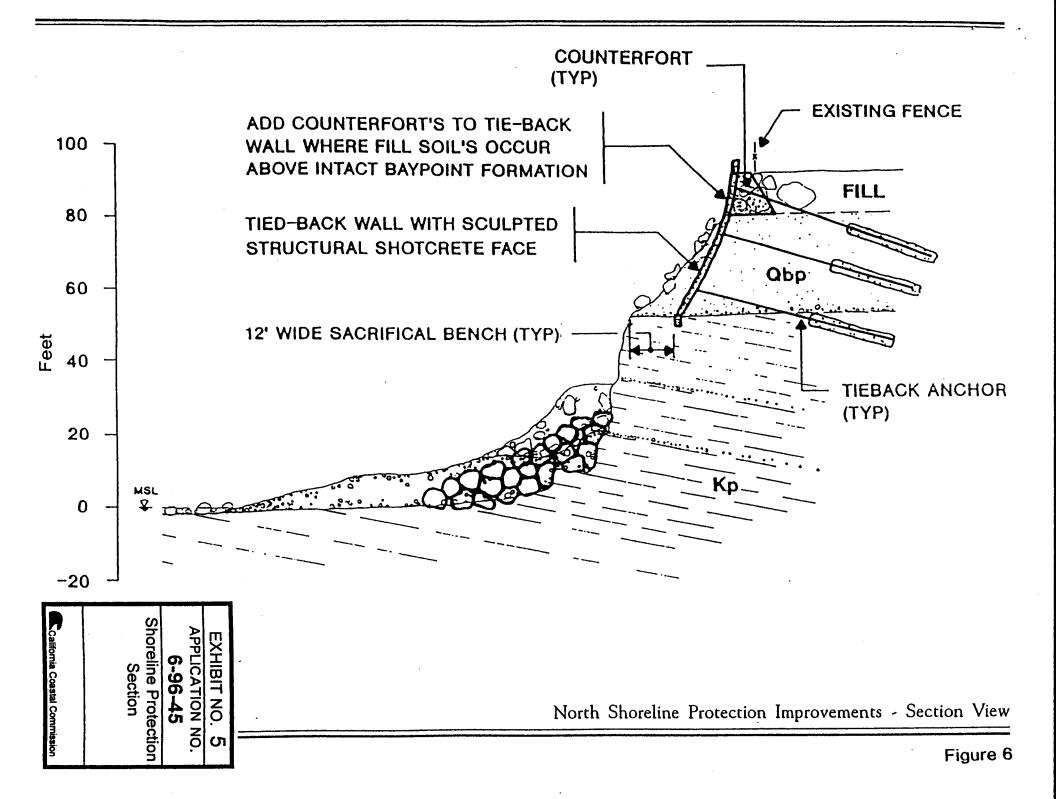
Project Specific
Site Plan

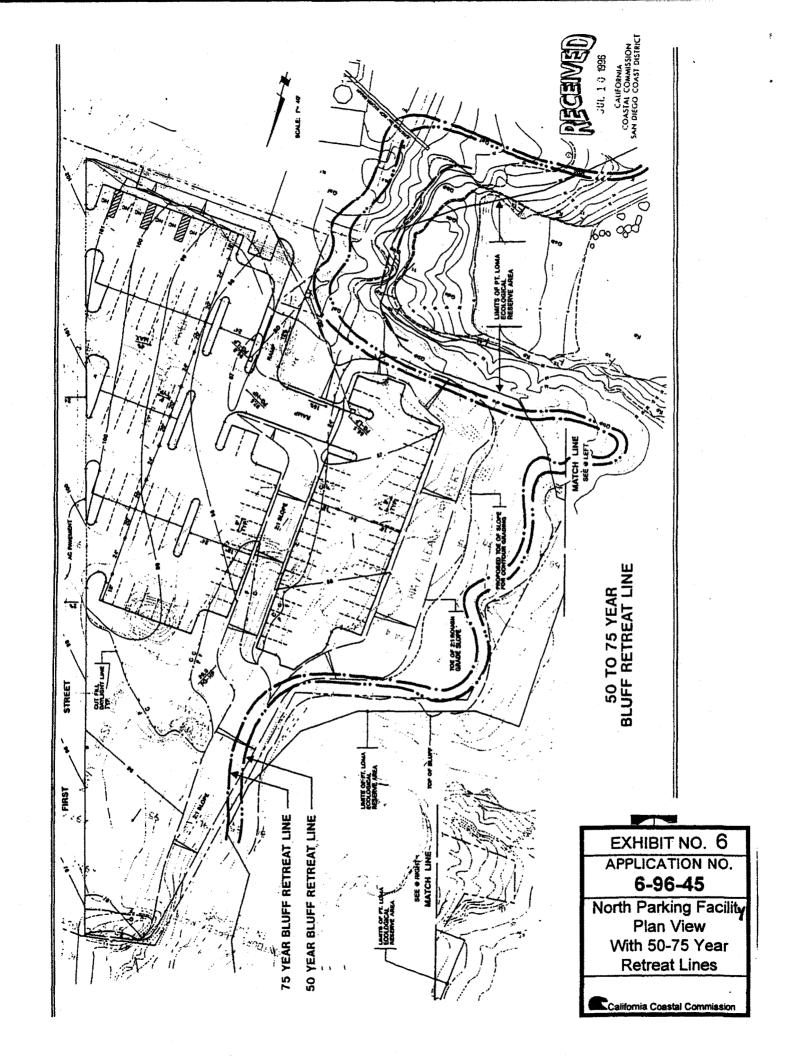
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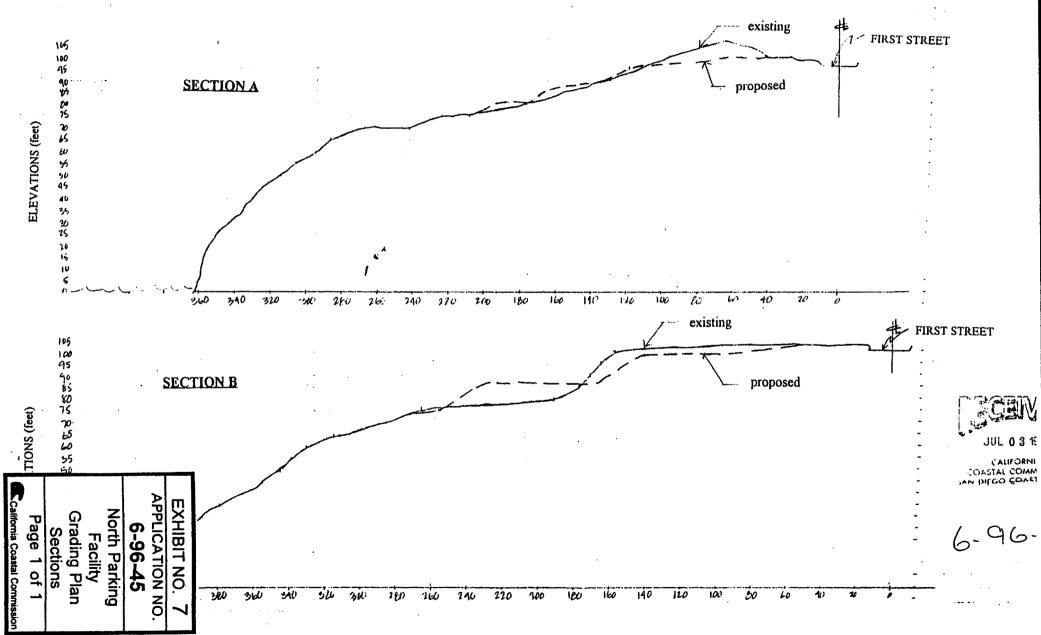
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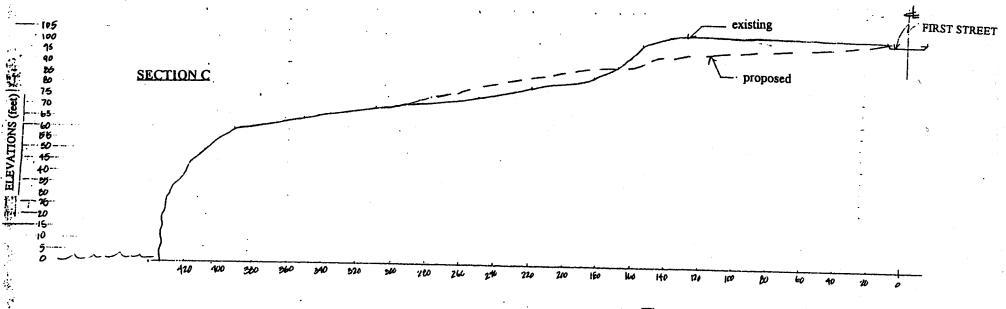




NORTH SHORELINE PROTECTION IMPROVEMENTS Profiles for the North Parking Facility

SCALE: Horizontal 1"= 40'
Vertical 1"= 30'





DISTANCE FROM CENTERLINE OF FIRST STREET (feet)

RECEIVED

JUL 0 3 1936

CALIFORNIA COASTAL COMMISSION SAN DIEGO COAST DISTRICT

6-96-45

APPLICATION NO. /
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North Parking
Facility
Grading Plan
Sections
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California Coastal Commission