

CALIFORNIA COASTAL COMMISSION

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Hearing Date: Nov. 3-6-1998
Commission Action:

STAFF REPORT: REGULAR CALENDAR

APPLICATION NUMBER: 5-98-331
APPLICANT: Richard & Agnes Huff
PROJECT LOCATION: 8120 Billowvista Drive, Playa del Rey, City of Los Angeles
PROJECT DESCRIPTION: Construct a 4,400 sq. ft. single-family residence, 2-story over basement, 40' high with four parking spaces.

Lot Area	5,718 sq. ft.
Building Coverage	2,141 sq. ft.
Pavement Coverage	400 sq. ft.
Landscape Coverage	3,177 sq. ft.
Parking Spaces	Four
Zoning	Low Density Residential
Ht above final grade	40'

LOCAL APPROVALS RECEIVED: Approval in Concept from the Department of City Planning of the City of Los Angeles

SUMMARY OF STAFF RECOMMENDATION:

Staff recommends approval of the proposed development with special conditions regarding participation in a drainage mitigation project, submittal of a drainage plan, conformance with geologic recommendations, assumption of risk from slope failure/erosion, grading/landscaping, and future improvements.

SUBSTANTIVE FILE DOCUMENTS:

1. Certified Playa Vista Land Use Plan.
2. California Coastal Commission; Statewide Interpretive Guideline for Wetland and Other Wet Environmentally Sensitive Habitat Areas.
3. National Audubon Society; Ballona Wetland, Landscape and Access Plan, Appendix III, Landscape.

4. Staff Recommendation on Minor Boundary Adjustment BA#6-89, City of Los Angeles, Los Angeles Co., 8/31/90.
5. City of Los Angeles, ICO Westchester Bluffs #165,508.
6. Recommended Native Plant Species for Landscaping Wildland Corridors in the Santa Monica Mountains, California Native Plant Society, November 23, 1988.
7. Department of Airport Commission, Airport Dunes Study, By Rudy Mattoni.
8. Coastal Development Permits 5-89-377 (Storey), 5-90-1109 (Wilhelmsen) & 5-91-282 (Pridgen).
9. Court Case C525-826 Friends of Ballona Wetlands et al. vs. California Coastal Commission, et al.

STAFF RECOMMENDATION:

The staff recommends that the Commission adopt the following resolution:

I. Approval with Conditions

The Commission hereby **GRANTS** a permit, subject to the conditions below, for the proposed development on the grounds that 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 effects on the environment within the meaning of the California Environmental Quality Act.

II. Standard Conditions:

1. **Notice of Receipt and Acknowledgment.** The permit is not valid and development shall not commence until a copy of the permit, signed by the permittee or authorized agent, acknowledging receipt of the permit and acceptance of the terms and conditions, is returned to the Commission office.
2. **Expiration.** If development has not commenced, the permit will expire two years from the date this permit is reported to the Commission. Development shall be pursued in a diligent manner and completed in a reasonable period of time. Application for extension of the permit must be made prior to the expiration date.
3. **Compliance.** All development must occur in strict compliance with the proposal as set forth in the application for permit, subject to any special conditions set forth below. Any deviation from the approved plans must be reviewed and approved by the staff and may require Commission approval.
4. **Interpretation.** Any questions of intent or interpretation of any condition will be resolved by the Executive Director or the Commission.

5. Inspections. The Commission staff shall be allowed to inspect the site and the project during its development, subject to 24-hour advance notice.
6. Assignment. The permit may be assigned to any qualified person, provided assignee files with the Commission an affidavit accepting all terms and conditions of the permit.
7. Terms and Conditions Run with the Land. These terms and conditions shall be perpetual, and it is the intention of the Commission and the permittee to bind all future owners and possessors of the subject property to the terms and conditions.

III. SPECIAL CONDITIONS

1. Conformance with Geotechnical Recommendations

PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicant shall submit grading and foundation plans for the review and approval of the Executive Director. The approved foundation plans shall include plans for the retaining walls, subdrains and footings. These plans shall include the signed statement of the geotechnical consultant certifying that these plans incorporate the recommendations contained in the Geotechnical Investigation Report dated December 9, 1996, prepared by Strata-Tech, Inc. The approved development shall be constructed in accordance with the plans approved by the Executive Director. Any deviations from said plans shall be submitted to the Executive Director for a determination as to whether the changes are substantial. Any substantial deviations shall require an amendment to this permit or a new coastal development permit.

2. Assumption of Risk/Indemnification

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 shall provide; (a) that the applicant understands that the site may be subject to extraordinary hazards from erosion, slope failure, mudslides and slumping and the applicant assumes the liability from such hazards; and (b) that the applicant unconditionally waives any claim of liability on the part of the Commission 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 due to natural hazards. The deed restriction shall run with the land, binding all successors and assigns, and shall be recorded free of prior liens that the Executive Director determines may affect the enforceability of the restriction.

3. Participation in Drainage Mitigation Project

Prior to issuance of the permit, the applicant shall record a Deed Restriction, in a form and content acceptable to the Executive Director, that provides that the applicant shall participate on the same basis as all similarly situated projects in any program to improve the drainage system and water quality of the street drainage emptying into the Ballona Wetlands. The agreement shall be enforceable by the City of Los Angeles, the State of California, or a private nonprofit organization with the designated responsibility of wetland restoration. The applicant shall agree to pay any fees or assessments to finance projects which would improve drainage, filter runoff, or improve the water quality of the Ballona Wetlands that would be applied to any new project on the Playa del Rey Bluffs, and would comply with any new standards for directing storm water to particular drains or treatment devices. The deed restriction shall run with the land, binding all successors and assigns, and shall be recorded free of prior liens that the Executive Director determines may affect the enforceability of the restriction.

4. Drainage Plan

Prior to the issuance of the coastal development permit, the applicant shall submit for the review and approval of the Executive Director, a final drainage and erosion control plan approved by the City of Los Angeles showing that all runoff from hardscape surfaces at the proposed building site will be diverted to Billowvista Drive.

5. Grading and Landscaping

Prior to the issuance of a Coastal Development Permit, the applicant shall submit for the review and approval of the Executive Director, a revised landscape plan which has been signed by a landscape architect or landscape contractor. All disturbed areas shall be planted and maintained for erosion control and visual enhancement purposes. All landscaping shall consist of native, drought resistant species (except for tall screening trees) as listed below to minimize the need for irrigation and to screen or soften the visual impact of development. Invasive, non-indigenous plant species which tend to supplant native species shall not be used. Such invasive plants are noted in an attachment to the document dated January 20, 1992, "Plants suited for wildland corridors of the Santa Monica Mountains" by the Native Plant Society, and in the Airport Department and Audubon documents noted above. The revised plans shall indicate the following:

- a) Trees shall be planted within the rear yard setback or in the rear yard area which, when mature, will screen those portions of the structure located more than 24 feet below the highest point on the roof from the Ballona Wetlands, Lincoln Boulevard and Culver Boulevard. Such trees shall not be of species which may

naturalize and invade native riparian and bluff areas, or which may inhibit the growth of native plants. The back yard area must be landscaped and not covered with any sort of impervious material with the exception of a small path. No deck or patio is permitted in this area.

b) Incorporate the use of California native plants selected from the list below (plants native to the bluff wetlands ecosystem, selected or placed to avoid situations of high flammability).

Acceptable Plants:

Sages (Salvia spp.)
 Chamise (Adenostoma fasciculatum)
 Yucca (Yucca whipplei)
 Buckwheat (Eriogonum fasciculatum), (Eriogonum parvifolium)
 Coastal brittlebush (Encelia californica)
 Coyote Bush (Baccharis pilularis)
 Box thorn (Lycium californicum)
 Golden bushes (Haplopappus spp.)
 Big root (Marah macrocarpus)
 Wild peony (Paeonia californica)
 Salt bushes (Atriplex spp. Native variety)
 Lemonade berry (Rhus integrifolia)
 Bladderpod (Isomeris arborea)

c) 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 (soil disturbance) and maintained through the development process to minimize sediment from run-off waters or gravity flow during construction. All sediment should be retained on-site unless removed to an appropriate approved dumping location.

6. Future Improvements

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 provides that Coastal Development Permit 5-98-371 is for the approved development only, and that any future additions or improvements to the property including lot-line adjustments, fencing and grading will require a new Coastal Development Permit from the Coastal Commission or its successor agency. The deed restriction shall run with the land, binding all successors and assigns, and shall be recorded free of prior liens that the Executive Director determines may affect the enforceability of the restriction.

IV. Findings and Declarations:

The Commission hereby finds and declares as follows:

A. Project Description and Location

The applicant proposes to construct a 4,400 sq. ft. single-family residence, 2-story over basement, 40' high with four parking spaces on a vacant 5.718 sq. ft. parcel. The subject lot descends northerly approximately 40 feet from the street.

The subject blufftop lot is located below the adjacent street, Billowvista Drive. The existing development along Billowvista Drive contains single-family residences. At the rear of these lots are undeveloped lots that are adjacent to Cabora Drive, an unimproved public utility access road.

There are single-family residences adjoining the currently vacant lot. Recently, in the nearby area, the Commission has approved coastal development permits for 5-91-285 (Gondal), 5-91-282 (Pridgen), 5-90-1109 (Wilhelmsen) , 5-92-349 (Galos) and 5-98-282 (Sheipe).

This property is located on a highly visible bluff overlooking Ballona wetlands; adjoining the Westchester bluffs. These bluffs are a prominent landform rising 140 feet above the Ballona Wetlands. Because the bluff faces were visually and biologically part of the Ballona Wetlands system, Los Angeles County included the lower portions of these bluff face lots as part of the Marina del Rey/Ballona Land Use Plan which was certified by the Commission on October 10, 1984. Subsequently, the City of Los Angeles annexed a 458 acre portion of the county's Marina del Rey/Ballona LCP area which included these blufftop and bluff face lots. The City of Los Angeles then submitted the Playa Vista Land Use Plan for the newly annexed coastal lands. The Commission certified the City's Playa Vista Land Use Plan in 1986. As a result of a court suit challenging the adequacy of habitat protection in the land use plan, the City and County are revising the LUP to reflect a settlement (Friends, etc.). The settlement proposes additional wetlands at the toe of the bluff but does not propose changes in land use for these lots.

The bluff face has been subdivided into multiple "tiers" of lots, with the first row generally located below (north of) Cabora Drive (currently a private, paved access road) and the second and third tiers located above (south of) Cabora Drive and below (north of) Billowvista Drive (at the top of bluff). This property lies on the bluff face above (south of) Cabora Drive and below (north of) Billowvista Drive. The property is within the certified Playa Vista Land Use Plan area and designated as a single-family residential area. The Playa Vista Land Use Plan identifies the area above (south of) Cabora Drive as Residential I and the area below (north of) Cabora Drive as a Ecological Support area or buffer area for the wetlands. The Ballona Creek wetlands occupy approximately 163 acres north of the bluff and Cabora Drive. The subject lot zoning is identified as Residential I.

The City of Los Angeles adopted an Interim Control Ordinance to address development decisions on the bluff face overlooking the wetland/Playa Vista area from Vista del Mar Lane to the San Diego Freeway. This property is located within an area subject to an Interim Control Ordinance issued by the City of Los Angeles. Ordinance No. 163,938, known as the Westchester Bluffs Interim Control Ordinance, specifies building regulations to guide and control development of the Westchester Bluffs on blufftops and bluff face areas, including building heights, setback requirements, lot coverage, design considerations, landscaping, grading, drainage, and erosion control. This ordinance was superseded by Ordinance No. 165,508, which became effective on March 26, 1990.

B. Environmentally Sensitive Habitat Areas

Sections 30240 and 30231 of the Coastal Act state:

Section 30241

(a) Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on such resources shall be allowed within such areas.

(b) Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade such areas, and shall be compatible with the continuance of such habitat areas.

Section 30231

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.

The Ballona Marsh/Wetlands is located at the base of the Playa del Rey (Westchester) bluffs. Approximately 210 acres of wetland area has been designated as a Habitat Management Area (163 acres will be restored to a full functioning wetland) in the Playa Vista Land Use Plan. Based on a 1991 settlement 190 acres will be restored by the landowner if the rest of the development requested in the plan is approved. The wetlands provide habitat for two endangered species the Beldings Savannah Sparrow and the Least Tern. The Playa Vista Land Use Plan identifies the area just south of Cabora Drive at the base of the bluff as a Ecologic Support Area or a buffer zone for the wetlands wetlands which will eventually be

restored. Early biologic reports identified the bluff face as habitat for predators that were a necessary part of the wetlands system.(LA County Museum)

In the Draft Land Use Plan, the bluff face was identified as an Environmentally Sensitive Habitat Area (ESHA). The Department of Fish and Game objected to the inclusion of this portion of the bluff as an Environmentally Sensitive Habitat Area. Except for its proximity to the Ballona Wetlands, the area would not be considered environmentally sensitive in any way. The sensitivity is due to the potential effects of nearby development on the wetlands, including invasion of plants from the yards adjacent to the wetlands. The Department of Fish and Game found that these impacts of adjacent residential uses proposed south of Cabora Drive along the top of the bluffs, as well as use of a portion of Cabora Drive for access to this housing, would preclude the long-term management of that portion of the bluffs as Environmentally Sensitive Habitat Area. The department, because of these long term management difficulties, proposed adding additional habitat in the marshland area, and deleting this area from the ESHA designation. Therefore, the Environmentally Sensitive Habitat Area designation was deleted for that portion of the bluffs from the Land Use Plan.

The proposed project could have the following impacts on the bluff and wetland habitat:

- A. The creation of impervious surfaces and earthwork can increase runoff and erosion adding soil solids to the drainage area and eventually into the wetlands in the form of greater water turbidity, and increased sedimentation.
- B. Residential/urban runoff contain a variety of pollutants (pesticides, residues, fertilizers etc.) that could be introduced into wetlands.
- C. Outdoor lighting could disturb wetland wildlife (primarily nocturnal and/or secretive species).
- D. Clearing vegetation from the bluff face and introduction of invasive non-indigenous vegetation could supplant native bluff and wetland plant species.

In a nearby development, the applicants were conditioned to pump the drainage and runoff from development up to Veragua Drive. The applicant's foundation plans show a sump pump connecting to a storm drain pipe. The water would be pumped up to Berger Ave. and would then flow east to the mouth of Hastings Canyon and then into the Ballona Wetlands.

The Playa Vista Land Use Plan contains policies which require and provide for the restoration of 163 acres of degraded wetlands and feasibly restorable historic wetlands into functioning wetland habitat. The Playa Vista Land Use Plan contains the following policy regarding the restoration of the Ballona wetlands:

Marine Resources

- P3 If found to be consistent with the Habitat Restoration Plan, a lagoon system of approximately 10 acres may be created in the wetland to (1) capture urban runoff, (2) provide a flood control system, (3) provide the wetlands with fresh water through overflow and (4) create a habitat for marine life.

The settlement cited "Agreement for Settlement of Litigation in the 1984 Case of Friends of Ballona wetlands, et al. Vs. the California Coastal Commission, et al. Case No. C525-826" above proposes the applicant seek an amendment to the LUP to relocate the lagoon system from a location between Culver Drive west of the terminus of Jefferson, and south of the flood control channel to a location at the toe of the bluffs directly west of Lincoln Boulevard. However, regardless of which location is ultimately chosen for the lagoon, the certified LUP will require treatment and filtration before it discharges into the marsh.

Wetland restoration may include the alteration of existing drainage systems emptying into the wetlands and possibly some form of runoff treatment. As stated above, runoff from the proposed development will flow into the Ballona Wetlands, contributing to the overall amount of urban runoff flowing into the wetlands.

The City's Interim Control Ordinance is designed to prohibit unregulated development and to set guidelines for development until a comprehensive plan for the Westchester Bluffs area is enacted. Thus, the ICO acknowledges that there are severe slope erosion problems with the bluffs, but still permits development, with provisions for drainage and erosion control.

For this reason, the Commission finds that as a special condition of approval, the applicant must record an agreement with the City of Los Angeles that provides the applicant shall participate on the same basis as all similarly situated projects in any program that improves the drainage system and water quality of the street drainage flowing into the Ballona Wetlands. The applicant shall agree to pay any fees or assessments regarding water quality that would be applied to any new project on the Playa del Rey Bluffs, and comply with any standards for directing storm water to particular drains or treatment devices.

Outdoor lighting can disturb nocturnal or secretive species. The proposed design plans do not include plans illustrating the type and location of outdoor lighting. However, since the development is on the upper portion of the bluff face and not directly adjacent to the wetlands, night lighting should not significantly impact wetland wildlife since light attenuates rather rapidly with distance.

In addressing this issue in a previous Coastal Permit, #5-89-377 (Storey), where the Commission had jurisdiction over the back yard of the project only, the Commission required landscaping with native plants. In the cases of 5-90-1109 (Wilhelmsen, 7763 Veragua Dr.) and 5-91-285 (Gondal, 7779 Veragua Dr.) the Commission found that landscaping would be necessary to stabilize the topsoils on the bluff face surrounding the house. For this reason, the Commission found that as a special condition of approval, that rear yard setback areas be kept in a natural state and that paved areas, like patios, be removed. The city's Interim Control Ordinance (ICO) also addresses the issue by requiring the use of native plants.

However, the ICO does not require that any native soils be reserved on the property to provide a location to plant the native plants. In some projects, some landscaping will be necessary to stabilize the topsoils on the bluff face surrounding the house.

In this case, the applicant has not submitted a drainage plan. In keeping with nearby Commission approvals, and in order to protect the ESHA wetlands from siltation due to slope soil erosion, the Commission finds that the applicant must submit a final drainage plan showing that all drainage and runoff from the developed site is diverted to Berger Ave. In addition, the applicant is also being conditioned to submit a landscaping plan which conforms to the plant list in Special Condition 5. Therefore, the Commission finds that as a special condition of approval, the applicant must submit grading and landscaping plans that show:

1. Use of indigenous plant species on the site, and 2) identifies the final location and type of plants (all plants) which will be used in landscaping. The project is also conditioned to require the use of sediment basins during grading operations.

The Los Angeles City ICO requires that landscaping include plants indigenous to the Ballona Wetlands and bluffs. It also requires the use of trees for visual screening of the structures. In this case trees that are 40 feet high will be required. There are no trees that are 40 feet high that are native to the wetlands or bluffs, and which support ecosystems of low, ground-hugging plants or shrubs. In addition, the conditions in the Covenant and Agreement Regarding Maintenance of Building state that no trees shall be allowed in the side or front yards. Because the rear of the residence would be 45' high, trees planted here would not obstruct views. Therefore, the Commission permits the use of non-indigenous trees for purposes of screening, but requires that they not be of the many species that may invade sensitive habitat areas or inhibit native plants and animals. Lists of invasive species have been prepared in the course of preparing revegetation studies currently underway in the Ballona Wetlands, and in the nearby Airport Dunes portion of this same Pleistocene Dune Complex, and by the Native Plant Society. Invasive plants establish themselves in many areas and then choke out native plants which may be food plants to native animals.

The Coastal Act habitat policies require that projects adjacent to Environmentally Sensitive Habitat Areas be developed consistent with the maintenance of the habitat areas. Although this area is not immediately contiguous to the wetland and the value of small patches of habitat may be small, there is grounds within the general policies found in the Playa Vista Land Use Plan for preserving and restoring as much native vegetation as possible. It is most important, however, that development adjacent to the wetlands not include species that may escape and supplant native plants within the ecosystem. As conditioned to include some, (not all) compatible plants and to require no incompatible plants, this development is consistent with Section 30240(a) of the Coastal Act. As conditioned to control grading, reduce landform alteration, and to revegetate, the project conforms with Sections 30240 and 30251 of the Coastal Act.

C. Geologic Hazard

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, 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's Statewide Interpretive Guidelines state in part that:

To meet the requirements of the act, bluff and cliff developments must be sited and designed to assure stability and structural integrity for their expected economic lifespans while minimizing alteration of natural landforms. Bluff and cliff developments (including related storm runoff, foot traffic, site preparation, construction activity, irrigation, waste water disposal and other activities and facilities accompanying such developments) must not be allowed to create or contribute significantly to problems of erosion or geologic instability on the site or on surrounding geologically hazardous areas.

In addition, the Playa Vista Land Use Plan contains the following policy regarding development on the bluff:

Hazards

P11 Grading shall be permitted on the bluffs only to the extent necessary for habitat protection, mitigation of potential geologic hazard, slope stabilization, erosion control, residential development or road construction. However any development on the bluffs shall incorporate adequate standards for grading, drainage control, setbacks and geologic engineering.

The Playa del Rey Bluffs are in general composed of highly erodible sand with only slight cohesion. Severe erosion has occurred in areas where concentrated drainage has been allowed to flow uncontrolled over the slopes.

The City of Los Angeles Interim Control Ordinance #163,938 limits the issuance of building permits in the Westchester Bluffs area. The applicant has obtained a hardship exemption from aspects of the ordinance pertaining to height limitations. The ordinance discusses the stability of the bluffs.

Whereas, the entire slope that forms the Bluffs is in a state of minor failure due to the slope being too high for a continuous slope and too steep for the type of natural material exposed; and

Whereas, long-term stabilization of the Bluffs could become impossible if unregulated new development occurs; and

Whereas, there have been nine (9) separate slope failures identified on the Marina Bluffs slope between Veragua Drive and Cabora Drive which pose a threat to the long-term stability of the lots adjacent to Veragua Drive and Berger Avenue and a constant maintenance problem for Cabora Drive; and

Whereas, if the existing slope failures are left uncorrected, they will continue to grow in size, and support for Veragua Drive may be lost; and

Whereas, appropriate long-term slope failure mitigations may not be effective if solely confined to single lots; and

The proposed residence is located on a hillside lot in an area which is subject to natural hazards. Natural hazards common to this area include erosion, flooding and slumping. The applicant's geology report prepared by Strata-Tech, Inc. concludes that development "of the site as proposed is considered feasible from a soils engineering standpoint, provided that the recommendations stated herein are incorporated in the design and are implemented in the field."

Because of the steep slope of the lot, the recommendations contained in the geology report requires specific construction methods that are the responsibility of the applicant to carry out in a safe manner. Following is an excerpt from that report:

Exterior hardscape shall either be underlain by fills exhibiting a minimum of ninety(90%) relative compaction or supported by a foundation system placed into competent native material. The existing artificial fills are not adequate for support of hardscape. Hardscape should be supported by engineered fill soils, and designed for low expansive conditions or supported by deepened foundations deriving support from competent native material.

Positive drainage should be planned for the site. Drainage should be directed away from structures via non-erodible conduits to suitable disposal areas. The structure should utilize roof gutters and down spouts tied directly to yard drainage. Drainage shall not be directed onto or over slopes.

To minimize differential earth movements, such as heaving and shrinkage, due to the change in moisture contents of foundation soils which may cause distress to a residential structure, moisture content of the soils surrounding the structure should be kept relatively constant as possible.

The applicant has submitted a Geotechnical Investigation Report dated December 9, 1996, prepared by Strata-Tech, Inc. Following is a brief description of the site as excerpted from that report:

Within the site boundaries, the descending slope does not exhibit gross or surficial instabilities, although downslope or the property, small surficial instabilities are present. These are attributed to the lower slope having a slightly steeper gradient than the upper slope.

The site is not known to be in a zone known for active faults, but faults are nearby, which could affect the project. The design engineer should design the structure for soil profile S2, zone 4.

The likelihood of liquefaction on this site is considered remote based on moderate ground shaking.

From a geologic viewpoint, the site exhibits favorable conditions for the proposed development.

In addition, the applicant's conditional geology approval from the City of Los Angeles Department of Building and Safety also requires certain provisions be fulfilled with during site development. Following are some of the City's geology conditions:

7. The geologist and soil engineer shall inspect all excavations to determine that conditions anticipated in the report have been encountered and to provide recommendations for the correction of hazards found during grading.
8. All man-made fill shall be compacted to a minimum 90 percent of the maximum dry density of the fill material per the latest version of ASTM D 1557.
9. Both the geologist and the soils engineer shall inspect and approve all full and subdrain placement areas prior to placing fill. Both consultants shall include in their final reports a certification of the adequacy of the foundation material to support the fill without undue settlement and/or consolidation.
13. The residence and other structures shall be supported on footings founded in native soil.
14. Footings shall be located a minimum horizontal distance of 40 feet from the face of the slope.
15. The geologist and soil engineer shall inspect the excavations for the footings to determine that they are founded in the recommended strata before calling the Department for footing inspection.

16. Temporary excavations shall be no steeper than 1:1.

Therefore, the Commission finds that the house can be approved consistent with Section 30253 of the Coastal Act, as long as the applicant conforms to the recommendations contained in the aforementioned soils and geology report. The Commission further finds that the proposed residence as conditioned to conform to the consultant's geology and soils recommendations, will minimize risks of developing in this area that may occur as a result of natural hazards.

The Commission, in previous permit actions on development in this area, has found that there are certain risks associated with hillside development that can never be entirely eliminated. In addition to the general risks associated with hillside development in geologically hazardous areas, the Commission notes that its approval is based on professional reports and professional engineering solutions that are the responsibility of the applicants to implement. Based on site specific soil/geologic constraints addressed in the applicant's geology report, the applicant shall, as a condition of approval, assume the risks inherent in potential slope failure from erosion. Therefore, the Commission further finds that in order to be consistent with Section 30253 of the Coastal Act, the applicant must also record a deed restriction assuming the risk of developing in this hazardous area, and waiving the Commission's liability for damage that may occur as a result of such natural hazards.

D. Visual Resources

Section 30251 of the Coastal Act states that permitted development shall be sited and designed to minimize the alteration of natural landforms and protect the scenic and visual quality of coastal areas:

Section 30251

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 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.

In addition, the Playa Vista Land Use Plan contains the following policy regarding the protection of visual resources:

Development Standards/Compatibility of Development:

- P1 Views of distinctive visual resources (e.g. bluffs, wetlands) will not be significantly disturbed.

As mentioned above, the proposed project is a 45-foot high (above existing natural grade) single-family dwelling on a vacant bluff face lot. As proposed, the structure is setback approximately 17 feet from Billowvista Drive down the bluff face and will be highly visible from the wetlands, and Lincoln and Culver Boulevards. Culver Boulevard is a designated Scenic Highway. From the top of the bluff, expansive, generally unobstructed views of the wetlands, ocean, marina, cityscape, and the Santa Monica and San Gabriel Mountains are offered from Veragua and Berger Drives. A number of single-family dwellings have been recently constructed on the bluff face which are similar to the proposed dwelling regarding size and scale. Since the Coastal Zone Boundary Adjustment, this is the fourth house that has come before the Commission on this row of lots, which also contains other as yet undeveloped parcels. The City's Interim Control Ordinance has provisions to limit the visual impacts of development.

The ordinance limits heights above the curb at the top of the lot to 9 feet maximum and to 5 feet over some portions of the lot. On bluff faces, the ordinance permits houses to be a maximum of 57 feet in height above finished grade. This house conforms to both those height limits.

The Coastal Act issue here is whether the house as a whole has a negative visual impact on areas to be dedicated to the public, the wetlands below, and on views from coastal access routes; Culver and Lincoln Boulevards.

Although the development is approximately 45 feet high and highly visible from Culver Boulevard and the wetlands, it is similar in size and scale to existing homes on the bluff.

The City requires screening of structures on downslope lots which exceed 24 feet in height. This requirement is not possible to carry out by means of potted plants that would grow on a terrace. Tall trees can also be planted below the retaining wall for screening purposes. Coastal Dun and Coastal Sage Scrub plants, appropriate biologically to the area, are not high enough to soften the visual effect of the building. However, there are some plants which are not invasive, which could be placed in the rear yard setback and which could reduce the apparent height of the structure. With the structure as it is proposed, using the guidance of the ICO, such trees should be at least 40 feet high. Although landscaping with tall trees generally soften visual impacts of solid structures, review of previously approved projects that have been built on the bluff face, it is apparent that due to the steepness of the bluff and size of the structures the residences are highly visible and landscaping has only a minimal effect on reducing the visual impact of the structures.

The Commission finds that the view through the project, as required by the City, will supply views to and along the coast. Accordingly, the Commission finds that it is necessary to require the applicant to record a Deed Restriction to limit future development on the property. Special condition #6 requires all future improvements on the site including, but not limited to,

grading, lot-line adjustments, landscaping, and fencing to receive a Coastal Development Permit. Only as conditioned, is the proposed project consistent with Section 30251 of the Coastal Act and will not reduce the ability of the city to adopt ordinances for view protection consistent with the Playa Vista certified Land Use Plan.

E. Local Coastal Program

Section 30604(a) of the Coastal Act states that:

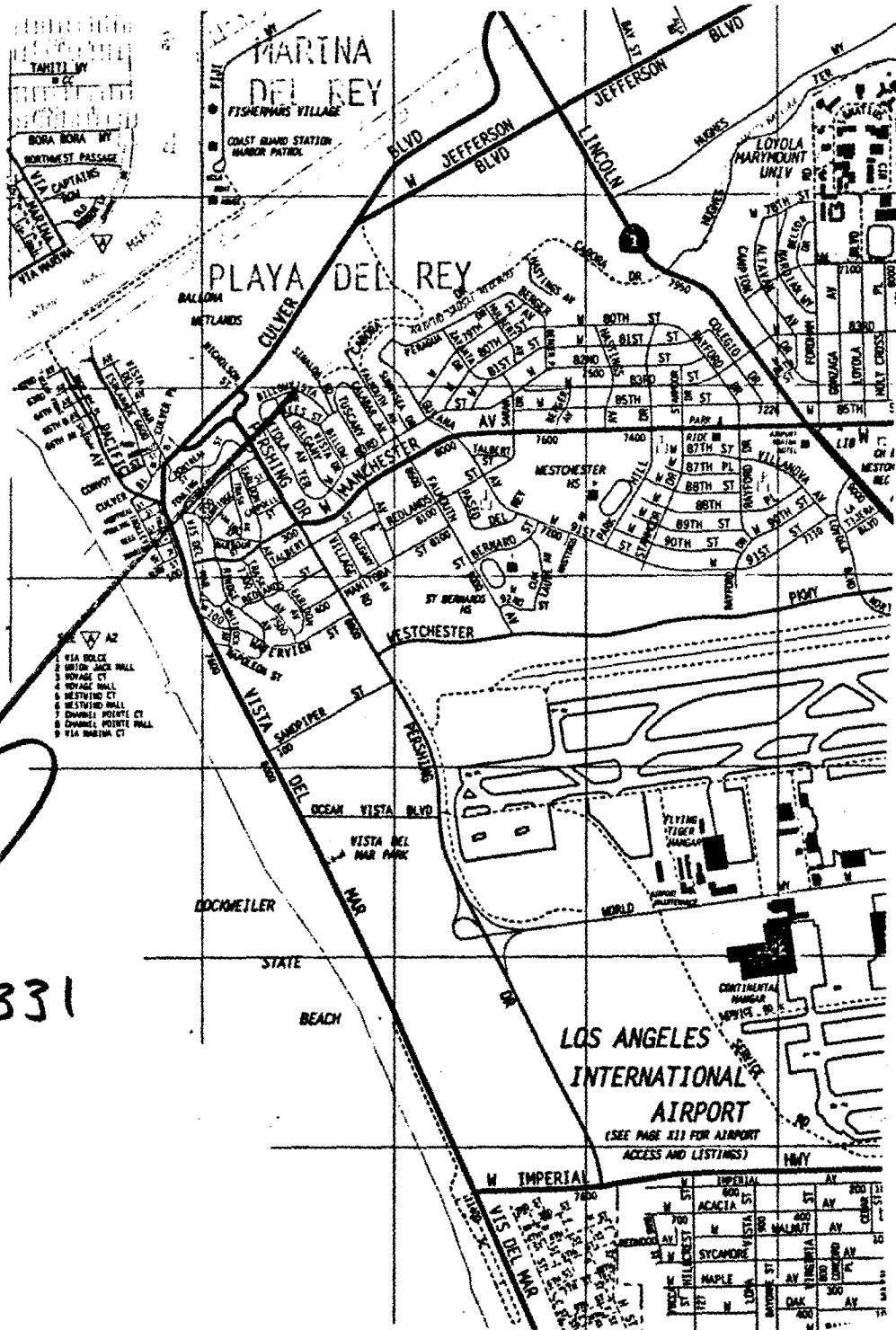
Prior to certification of the Local Coastal Program, a Coastal Development Permit shall be issued if the issuing agency, or the Commission on appeal, finds that the proposed development is in conformity with the provisions of Chapter 3 (commencing with Section 30200) of this division and that the permitted development will not prejudice the ability of the local government to prepare a Local Coastal Program that is in conformity with the provisions of Chapter 3 (commencing with Section 30200).

The Playa Vista Land Use Plan was certified with suggested modifications in 1986. The proposed project, as conditioned, is consistent with the Land Use Plan. Approval of the proposed development will not prejudice the city's ability to prepare certifiable Local Coastal Program. The Commission, therefore, finds that the proposed project is consistent with Section 30604(a) of the Coastal Act.

F. California Environmental Quality Act

Section 13096(a) of the Commission's administrative regulations requires Commission approval of a Coastal Development Permit application to be supported by a finding showing the application, as conditioned by any conditions of approval, to be consistent with any applicable requirements of the California Environmental Quality Act (CEQA). Section 21080.5(d)(2)(A) 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.

There is no feasible alternative with less environmental impact. The proposed project, as conditioned, will not cause any significant adverse impacts on the environment. Therefore, the Commission finds that the project is the least environmentally damaging feasible alternative and can be found consistent with the requirements of the Coastal Act to conform to CEQA.



5-98-331

Exhibit A
5-98-331

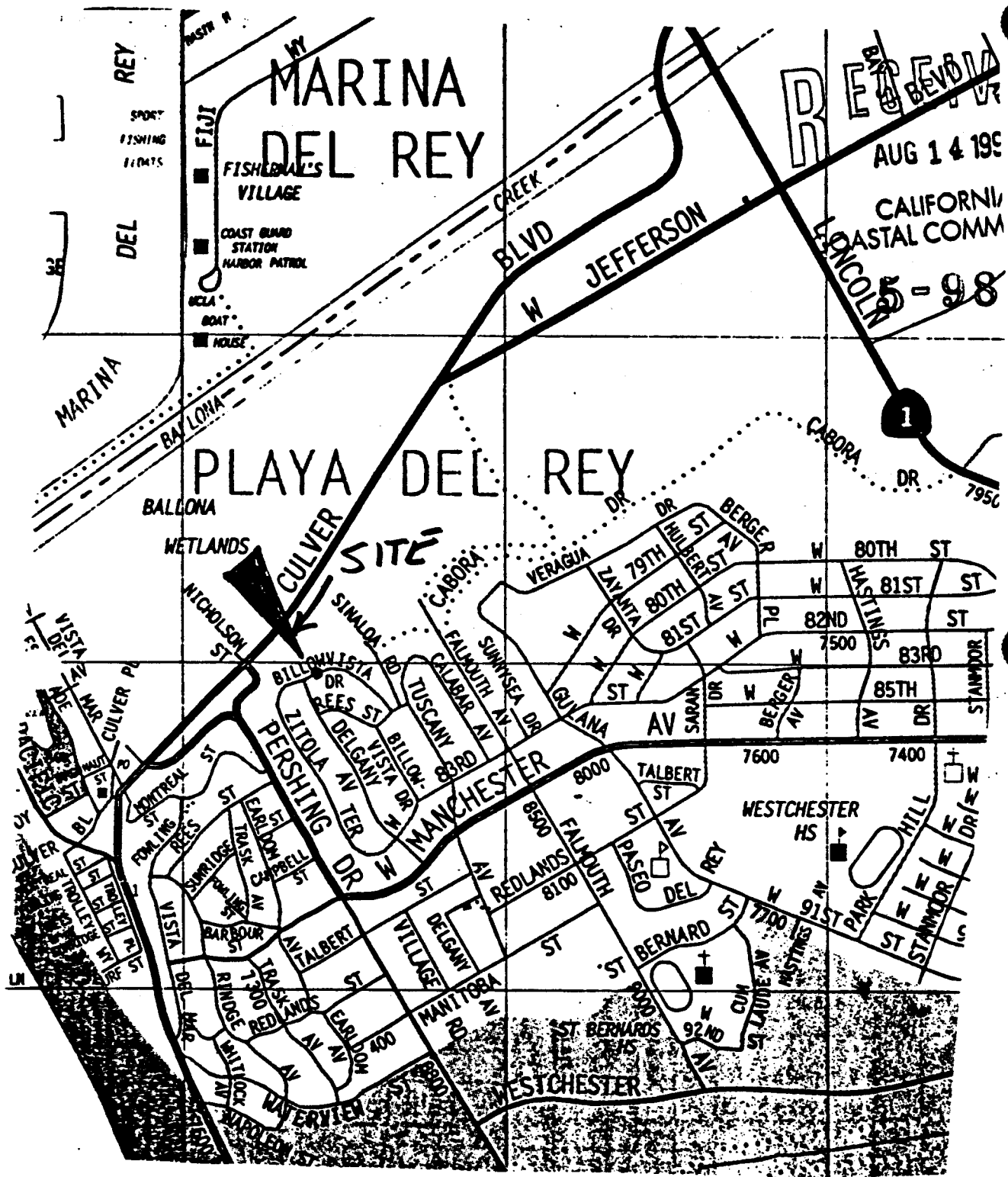


Exhibit B
5-98-331



STRATA-TECH, INC.
G E O C O N S U L T A N T S

7372 Walnut Avenue, Unit F, Buena Park, California 90620 • 714-521-5611 • 310-427-8099 • FAX 714-521-2552

May 8, 1998

W.O. 95096-02

Mr. and Mrs. Richard Huff
c/o Huff Real Estate
P.O. Box 2959
Culver City, CA 92666

Subject: Update of Existing Geotechnical Report
for Lots 99 and 100, Tract No. 9809,
Playa del Rey Area, City of Los
Angeles, California

Reference:

1. Preliminary Geotechnical Investigation for Proposed Residential Development at Lots 99 and 100, Block 36, Tract 9809, Playa del Rey, California; by STRATA-TECH, Inc., W.O. 95096, dated December 9, 1996.

Gentlemen:

In accordance with your request, STRATA-TECH has prepared this update letter for the referenced site.

The project site was observed on April 29, 1998, to be essentially in the same physical condition as that described in the referenced report.

It is our opinion that recommendations contained in Reference 1 remain applicable to the site and that additional recommendations are not required at this time.

We appreciate this opportunity to be of service.

Respectfully submitted,
STRATA-TECH, INC.

Bruce A. Packard
Bruce A. Packard
RGE 662
BAP/TDH

Todd D. Houseal
Todd D. Houseal
CEG 1914
E/p 4/60

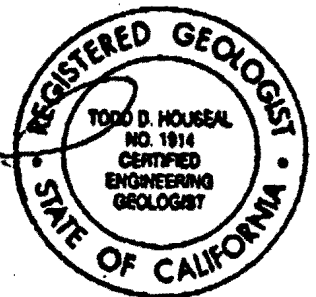


Exhibit C
5-98-331

CITY OF LOS ANGELES

CALIFORNIA

RECEIVED

SEP 24 1998

DEPARTMENT OF BUILDING AND SAFETY

400 CITY HALL
LOS ANGELES, CA 90012-4000

TIM TAYLOR
GENERAL MANAGER

RICHARD E. HOLGUIN
EXECUTIVE OFFICER



RICHARD J. RIORDAN
MAYOR

CALIFORNIA

COASTAL COMMISSION

COMMISSIONERS

J. L. FOSTER
PRESIDENT

MABEL CHANG
VICE-PRESIDENT

LEE ANON. ALPERT

JEANETTE APPELEGATE

NANCY H. ZAMORA

May 12, 1998

Log # 24283
Soils/Geo File-2

Mr. Richard Huff
PO box 2959
Culver City, Ca. 90231-2959

TRACT: 9808
LOT: por of 99&100
LOCATION: 8120 Billowvista Dr.

<u>CURRENT REFERENCE REPORT/LETTER(S)</u>	<u>REPORT NO.</u>	<u>DATE(S) OF DOCUMENT</u>	<u>PREPARED BY</u>
Soils/Geo Report	95096	Dec.9, 1996	Strata- Tech, Inc.

The above report concerning recommendations for a single family residence has been reviewed by the Grading Section of the Department of Building and Safety. According to the report the site is underlain by dune sand.

The report is acceptable, provided the following conditions are complied with during site development:

1. The geologist and soils engineer shall review and approve the detailed plans prior to issuance of any permits. This approval shall be by signature on the plans which clearly indicates that the geologist and soils engineer have reviewed the plans prepared by the design engineer and that the plans include the recommendations contained in their reports.
2. All new or existing graded slopes shall be no steeper than 2:1.
3. All recommendations of the report which are in addition to or more restrictive than the conditions contained herein shall also be incorporated into the plans for the project.
4. The applicant is advised that the approval of this report does not waive the requirements for excavations contained in the State Construction Safety Orders enforced by the State Division of Industrial Safety.

Exhibit D
1 of 3
5-98-131

AN EQUAL EMPLOYMENT OPPORTUNITY - AFFIRMATIVE ACTION EMPLOYER

5. A grading permit shall be obtained.
6. A copy of the subject and appropriate referenced reports and this approval letter shall be attached to the District Office and field set of plans. Submit one copy of the above reports to the Building Department plan checker prior to issuance of the permit.
7. The geologist and soil engineer shall inspect all excavations to determine that conditions anticipated in the report have been encountered and to provide recommendations for the correction of hazards found during grading.
8. All man-made fill shall be compacted to a minimum 90 percent of the maximum dry density of the fill material per the latest version of ASTM D 1557.
9. Both the geologist and the soils engineer shall inspect and approve all fill and subdrain placement areas prior to placing fill. Both consultants shall include in their final reports a certification of the adequacy of the foundation material to support the fill without undue settlement and/or consolidation.
10. All graded, brushed or bare slopes shall be planted with low-water consumption, native-type plant varieties recommended by a landscape architect.
11. The driveway shall be graded to drain to the street and all roof and pad drainage shall be conducted to the street in an acceptable manner.
12. Prior to issuance of the building permit, the design of the subdrainage system required to prevent possible hydrostatic pressure behind retaining walls and under floors below grade shall be approved by the soils engineer and accepted by the Department. Installation of the subdrainage system shall be inspected and approved by the soils engineer and by the City grading inspector.
13. The residence and other structures shall be supported on footings founded in native soil.
14. Footings shall be located a minimum horizontal distance of 40 feet from the face of the slope.
15. The geologist and soil engineer shall inspect the excavations for the footings to determine that they are founded in the recommended strata before calling the Department for footing inspection.
16. Temporary excavations shall be no steeper than 1:1.
17. Prior to the placing of compacted fill, a representative of the consulting soils engineer shall inspect and approve the bottom excavations. He shall post a notice on the job site for the City Grading Inspector and the contractor stating that the soil inspected meets the

5-98-331 Exhibit D
20ft

conditions of the report, but that no fill shall be placed until the City grading inspector has also inspected and approved the bottom excavations. A written certification to this effect shall be filed with the Department upon completion of the work. The fill shall be placed under the inspection and approval of the soils engineer. A compaction report shall be submitted to the Department upon completion of the compaction.

18. Prior to the pouring of concrete, a representative of the consulting Soil Engineer shall inspect and approve the footing excavations. He shall post a notice on the job site for the City Building Inspector and the Contractor stating that the work so inspected meets the conditions of the report, but that no concrete shall be poured until the City Building Inspector has also inspected and approved the footing excavations. A written certification to this effect shall be filed with the Department upon completion of the work.
19. Prior to excavation, an initial inspection shall be called at which time sequence of shoring, protection fences and dust and traffic control will be scheduled.

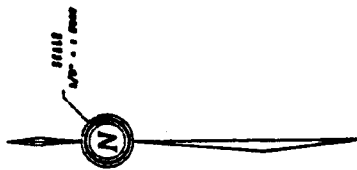
Theodore Nickerson
THEODORE NICKERSON
Engineering Geologist II

Theo R Seeley
THEO SEELEY
Geotechnical Engineer I

TDN:TRS:tdn:trs
a/24283
(213) 485-3435

cc: Strata-Tech, Inc.
Gary Silverston
WLA District Office

Exhibit D
3 of 3
5-98-331



- NOTES**
- 1. This map is based on the map of the area of the HUFF PROJECT, prepared by the U.S. Army Corps of Engineers, and is not a true representation of the actual terrain.
 - 2. The map is based on the map of the area of the HUFF PROJECT, prepared by the U.S. Army Corps of Engineers, and is not a true representation of the actual terrain.
 - 3. The map is based on the map of the area of the HUFF PROJECT, prepared by the U.S. Army Corps of Engineers, and is not a true representation of the actual terrain.
 - 4. The map is based on the map of the area of the HUFF PROJECT, prepared by the U.S. Army Corps of Engineers, and is not a true representation of the actual terrain.
 - 5. The map is based on the map of the area of the HUFF PROJECT, prepared by the U.S. Army Corps of Engineers, and is not a true representation of the actual terrain.
 - 6. The map is based on the map of the area of the HUFF PROJECT, prepared by the U.S. Army Corps of Engineers, and is not a true representation of the actual terrain.
 - 7. The map is based on the map of the area of the HUFF PROJECT, prepared by the U.S. Army Corps of Engineers, and is not a true representation of the actual terrain.
 - 8. The map is based on the map of the area of the HUFF PROJECT, prepared by the U.S. Army Corps of Engineers, and is not a true representation of the actual terrain.
 - 9. The map is based on the map of the area of the HUFF PROJECT, prepared by the U.S. Army Corps of Engineers, and is not a true representation of the actual terrain.
 - 10. The map is based on the map of the area of the HUFF PROJECT, prepared by the U.S. Army Corps of Engineers, and is not a true representation of the actual terrain.

G-3

HUFF PROJECT
RECONSTRUCTION OF THE
HUFF PROJECT TO BE
PLAY THE BEST, COMP.

TOPOGRAPHIC SURVEY	
PROJECT NO.	1110
DATE	11-10-57
SCALE	1" = 100'
BY	W. V. JONES
CHECKED BY	W. V. JONES
DATE CHECKED	11-10-57
DATE PLOTTED	11-10-57
DATE PRINTED	11-10-57



ENGINEERING DISTRICT
WASHINGTON, D.C.

W. V. JONES

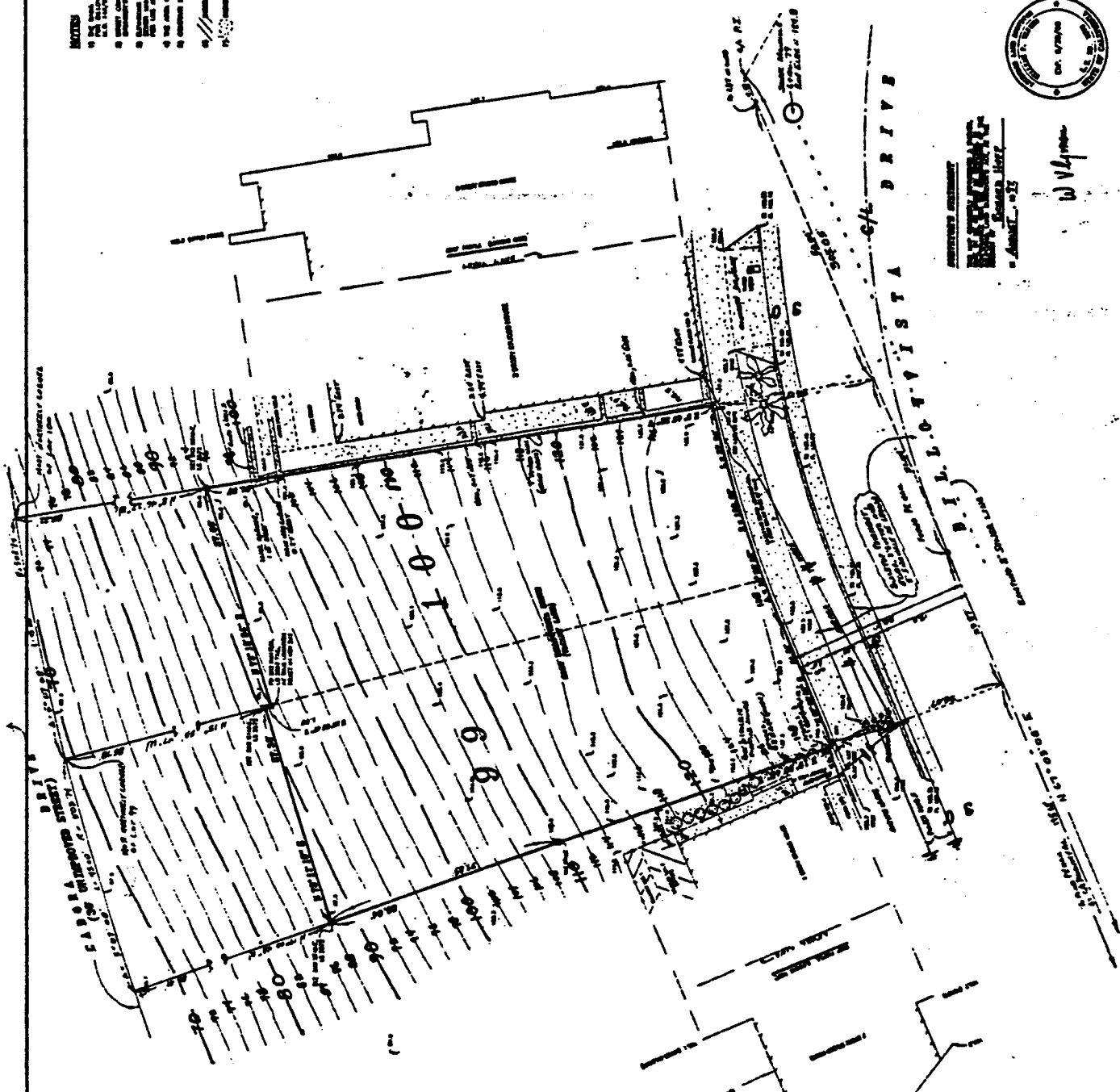
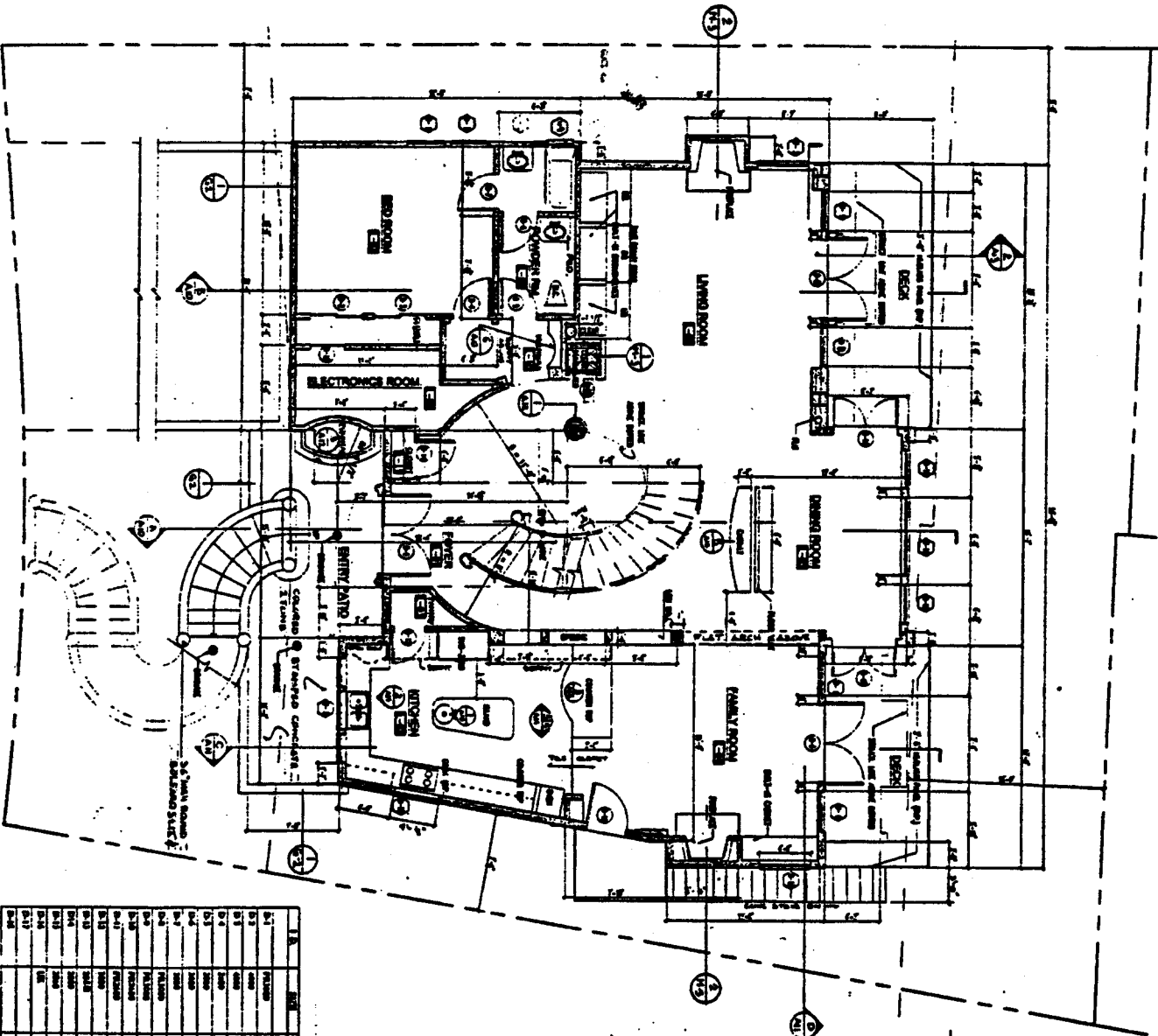


Exhibit E
5-98-331



LOWER LEVEL FLOOR PLAN
DATE: 10-1-88



BRIEF WINDOW SCHEDULE

All Windows Addition
 Part of Original
 Part of Other

LOWER LEVEL WINDOWS

NO.	QUANTITY	SYMBOL	DESCRIPTION	FINISH
W1	1	W1	6'-0" x 6'-0" Double Hung	Painted
W2	1	W2	6'-0" x 6'-0" Double Hung	Painted
W3	1	W3	6'-0" x 6'-0" Double Hung	Painted
W4	1	W4	6'-0" x 6'-0" Double Hung	Painted
W5	1	W5	6'-0" x 6'-0" Double Hung	Painted
W6	1	W6	6'-0" x 6'-0" Double Hung	Painted
W7	1	W7	6'-0" x 6'-0" Double Hung	Painted
W8	1	W8	6'-0" x 6'-0" Double Hung	Painted
W9	1	W9	6'-0" x 6'-0" Double Hung	Painted
W10	1	W10	6'-0" x 6'-0" Double Hung	Painted
W11	1	W11	6'-0" x 6'-0" Double Hung	Painted
W12	1	W12	6'-0" x 6'-0" Double Hung	Painted
W13	1	W13	6'-0" x 6'-0" Double Hung	Painted
W14	1	W14	6'-0" x 6'-0" Double Hung	Painted
W15	1	W15	6'-0" x 6'-0" Double Hung	Painted
W16	1	W16	6'-0" x 6'-0" Double Hung	Painted
W17	1	W17	6'-0" x 6'-0" Double Hung	Painted
W18	1	W18	6'-0" x 6'-0" Double Hung	Painted
W19	1	W19	6'-0" x 6'-0" Double Hung	Painted
W20	1	W20	6'-0" x 6'-0" Double Hung	Painted
W21	1	W21	6'-0" x 6'-0" Double Hung	Painted
W22	1	W22	6'-0" x 6'-0" Double Hung	Painted
W23	1	W23	6'-0" x 6'-0" Double Hung	Painted
W24	1	W24	6'-0" x 6'-0" Double Hung	Painted
W25	1	W25	6'-0" x 6'-0" Double Hung	Painted
W26	1	W26	6'-0" x 6'-0" Double Hung	Painted
W27	1	W27	6'-0" x 6'-0" Double Hung	Painted
W28	1	W28	6'-0" x 6'-0" Double Hung	Painted
W29	1	W29	6'-0" x 6'-0" Double Hung	Painted
W30	1	W30	6'-0" x 6'-0" Double Hung	Painted

DOOR SCHEDULE

NO.	QUANTITY	SYMBOL	DESCRIPTION	FINISH
D1	1	D1	6'-0" x 8'-0" Double Hung	Painted
D2	1	D2	6'-0" x 8'-0" Double Hung	Painted
D3	1	D3	6'-0" x 8'-0" Double Hung	Painted
D4	1	D4	6'-0" x 8'-0" Double Hung	Painted
D5	1	D5	6'-0" x 8'-0" Double Hung	Painted
D6	1	D6	6'-0" x 8'-0" Double Hung	Painted
D7	1	D7	6'-0" x 8'-0" Double Hung	Painted
D8	1	D8	6'-0" x 8'-0" Double Hung	Painted
D9	1	D9	6'-0" x 8'-0" Double Hung	Painted
D10	1	D10	6'-0" x 8'-0" Double Hung	Painted
D11	1	D11	6'-0" x 8'-0" Double Hung	Painted
D12	1	D12	6'-0" x 8'-0" Double Hung	Painted
D13	1	D13	6'-0" x 8'-0" Double Hung	Painted
D14	1	D14	6'-0" x 8'-0" Double Hung	Painted
D15	1	D15	6'-0" x 8'-0" Double Hung	Painted
D16	1	D16	6'-0" x 8'-0" Double Hung	Painted
D17	1	D17	6'-0" x 8'-0" Double Hung	Painted
D18	1	D18	6'-0" x 8'-0" Double Hung	Painted
D19	1	D19	6'-0" x 8'-0" Double Hung	Painted
D20	1	D20	6'-0" x 8'-0" Double Hung	Painted
D21	1	D21	6'-0" x 8'-0" Double Hung	Painted
D22	1	D22	6'-0" x 8'-0" Double Hung	Painted
D23	1	D23	6'-0" x 8'-0" Double Hung	Painted
D24	1	D24	6'-0" x 8'-0" Double Hung	Painted
D25	1	D25	6'-0" x 8'-0" Double Hung	Painted
D26	1	D26	6'-0" x 8'-0" Double Hung	Painted
D27	1	D27	6'-0" x 8'-0" Double Hung	Painted
D28	1	D28	6'-0" x 8'-0" Double Hung	Painted
D29	1	D29	6'-0" x 8'-0" Double Hung	Painted
D30	1	D30	6'-0" x 8'-0" Double Hung	Painted

Exhibit F
5-98-331

REVISED

PROJEC

HUPP PROJ
 1234567890
 1234567890
 1234567890

SILVERSTON
 DESIGN
 STUDIO

4444 1234567890
 4444 1234567890
 4444 1234567890
 4444 1234567890

TITLE
 DATE 9.1.88
 SHEET
 A-6

REVISED
11/96

PROJECT

HUFF PROJEC
MICHIGAN & ALBERTA
430 MILLIKEN BLVD
PLANT OIL, MI, 48126

SILVERSTON
DESIGN
STUDIO

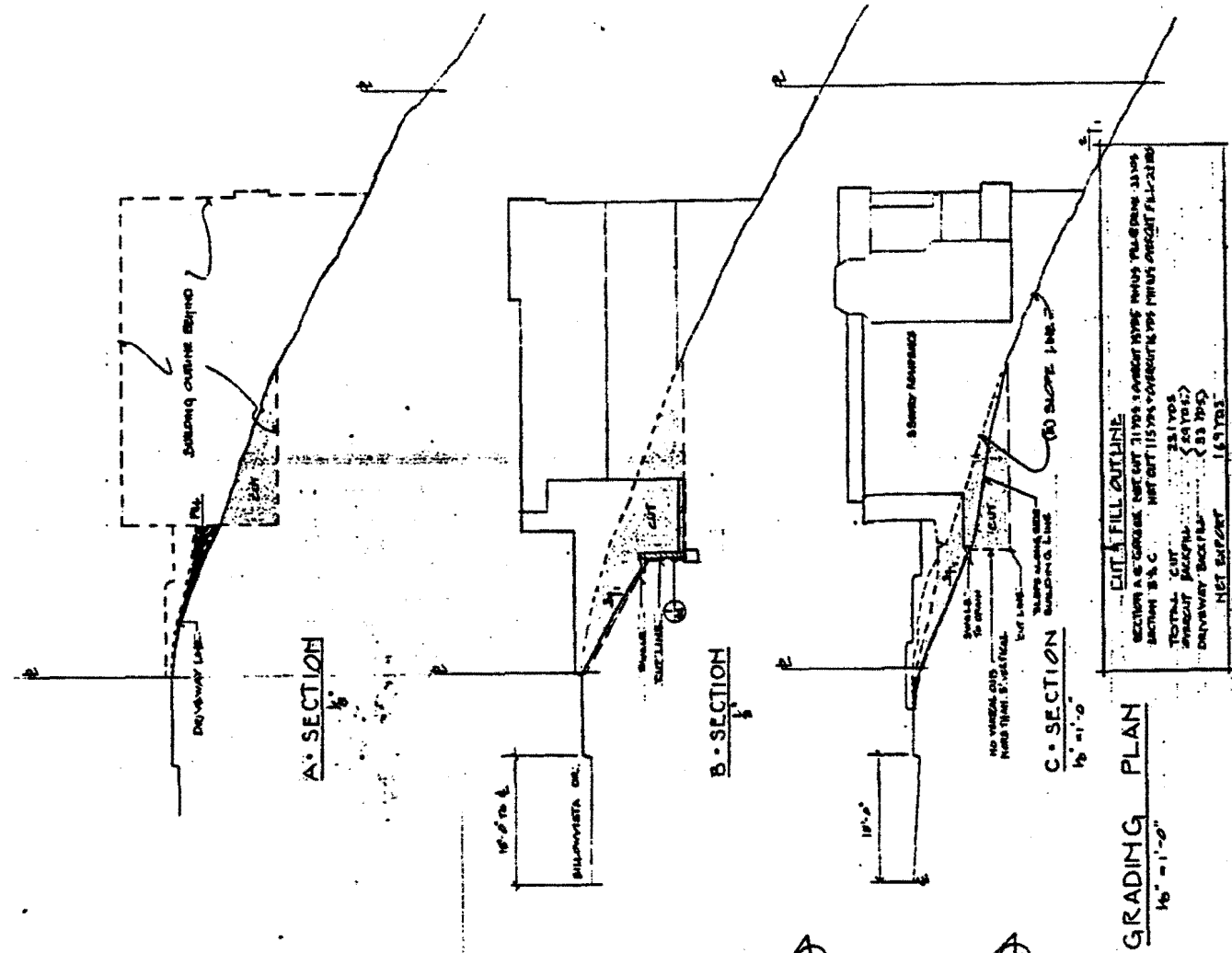
800 SILVERSTONE
2400 CANTY ROAD
MI 48106
P 313 485 8888
F 313 485 8888
E 313 485 8888

TITLE
GRADING

DATE
7.25.77

SHEET

G-4

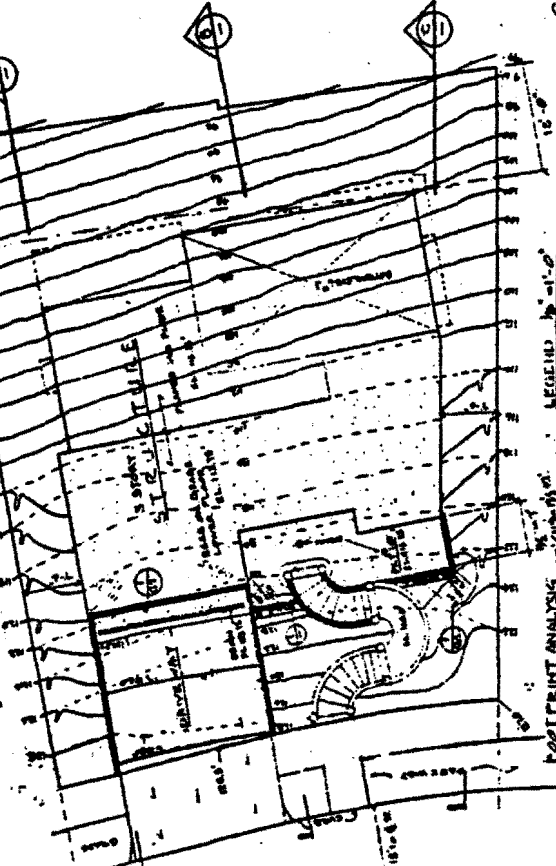


GRADING NOTES:

1. All elevations shall be reported to the datum which is used for the site plan.
2. The topography shown on this plan is based on a contour interval of 1.0 foot.
3. The grading shown on this plan is based on a contour interval of 1.0 foot.
4. The grading shown on this plan is based on a contour interval of 1.0 foot.
5. The grading shown on this plan is based on a contour interval of 1.0 foot.
6. The grading shown on this plan is based on a contour interval of 1.0 foot.
7. The grading shown on this plan is based on a contour interval of 1.0 foot.
8. The grading shown on this plan is based on a contour interval of 1.0 foot.
9. The grading shown on this plan is based on a contour interval of 1.0 foot.
10. The grading shown on this plan is based on a contour interval of 1.0 foot.

Exhibit G
5-98-331

SITE PLAN G



POSTPRINT ANALYSIS
 TOTAL AREA 1750 SF
 NET FLOOR AREA 1400 SF
 GROSS AREA 2150 SF
 PERIMETER 215.0 FT
 PERIMETER TOE 54

LEGEND
 CONTOUR LINES
 GRADING CONTOUR
 GRADING CONTINUOUS
 NET BACK FILL

REVISED
1.1.16

PROJECT

HUFF PROJECT
RICHARD & ALMA
5120 BILLOWVISTA DRIVE
PLAY DEL REY, CALIF.

SILVERSTON
DESIGN
STUDIO

5120 BILLOWVISTA
DRIVE
PLAY DEL REY, CALIF. 90241

PH 310 450 1000
PH 310 450 0200
PH 310 310 0000

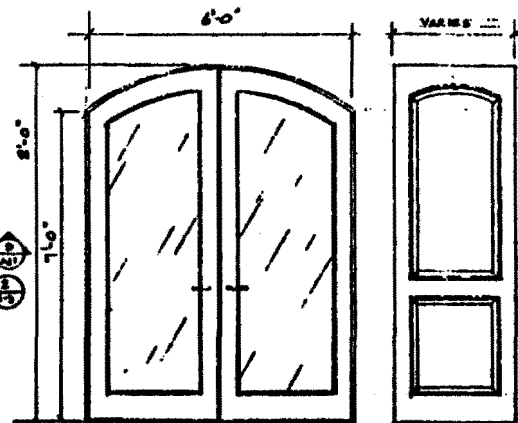
TITLE

DATE

1.1.16

SHEET

A-7



TYP. FRENCH DOORS

1/4" PANEL GLAZED TEMPERED
LBS 8" CLAD INTERIOR FINISH

TYP. DOOR

1 1/4" O.P. 60-100 (FINISH)

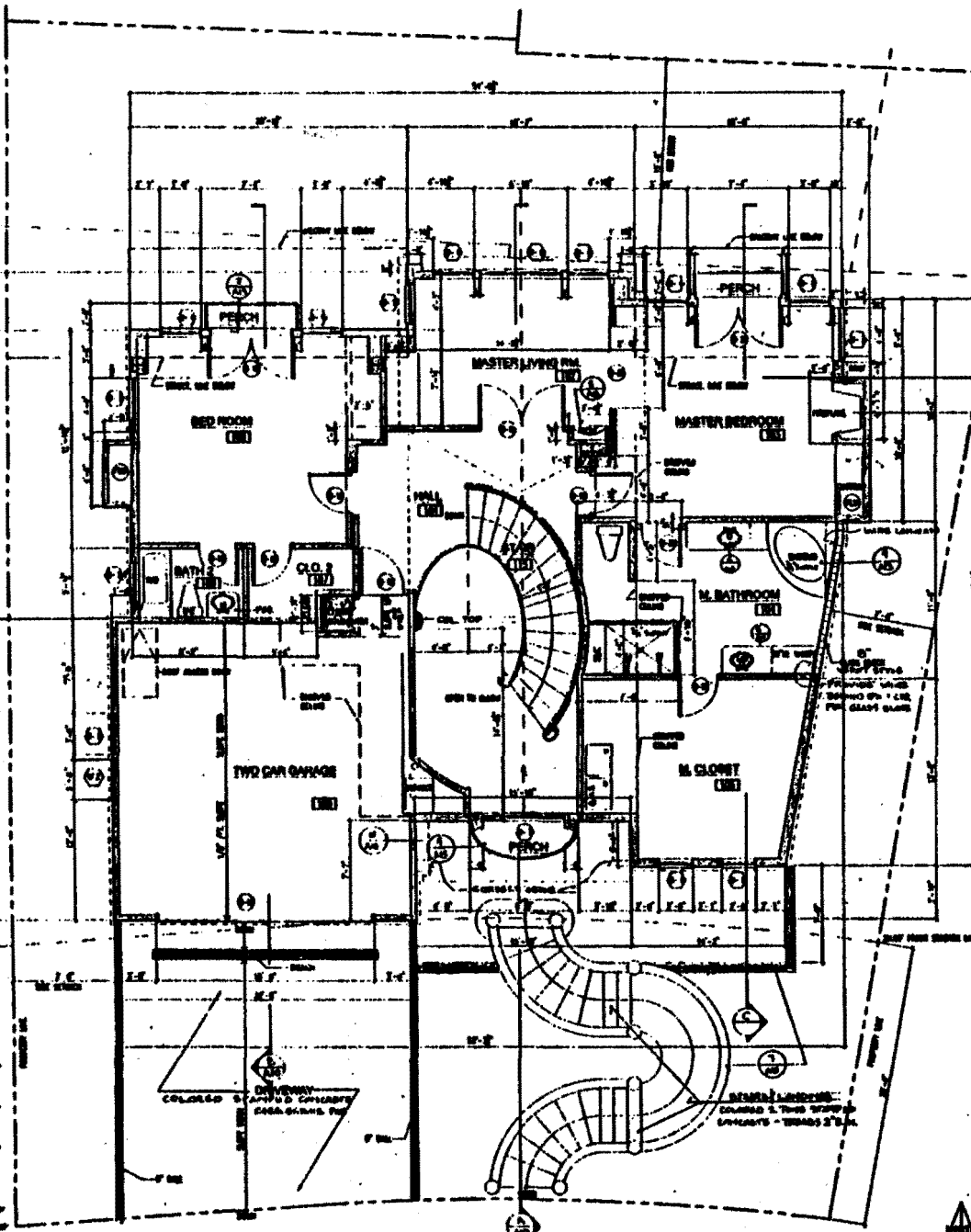
UPPER LEVEL WINDOWS

NO.	QTY	DESCRIPTION	SIZE	FINISH
W-1	2	FRONT PORCH	7'-0" x 6'-0"	Frame And Sill
W-2	1	FRONT PORCH	6'-0" x 7'-0"	Frame & Sill
W-3	4	OFF PORCH	7'-0" x 7'-0"	Frame & Sill
W-4	1	FRONT	7'-0" x 7'-0"	Frame
W-5	1	FRONT PORCH	7'-0" x 7'-0"	Frame Glass And Sill
W-6	1	FRONT	7'-0" x 7'-0"	As Shown
W-7	1	FRONT	7'-0" x 6'-0"	As Shown

DOOR SCHEDULE

NO.	QTY	DESCRIPTION	TYPE	FINISH	REMARKS
D-1	1	FRONT PORCH	60-100	1/4" Panel	FRONT PORCH
D-2	1	FRONT PORCH	60-100	1/4" Panel	FRONT PORCH
D-3	1	FRONT PORCH	60-100	1/4" Panel	FRONT PORCH
D-4	1	FRONT PORCH	60-100	1/4" Panel	FRONT PORCH
D-5	1	FRONT PORCH	60-100	1/4" Panel	FRONT PORCH
D-6	1	FRONT PORCH	60-100	1/4" Panel	FRONT PORCH
D-7	1	FRONT PORCH	60-100	1/4" Panel	FRONT PORCH
D-8	1	FRONT PORCH	60-100	1/4" Panel	FRONT PORCH
D-9	1	FRONT PORCH	60-100	1/4" Panel	FRONT PORCH
D-10	1	FRONT PORCH	60-100	1/4" Panel	FRONT PORCH
D-11	1	FRONT PORCH	60-100	1/4" Panel	FRONT PORCH
D-12	1	FRONT PORCH	60-100	1/4" Panel	FRONT PORCH
D-13	1	FRONT PORCH	60-100	1/4" Panel	FRONT PORCH
D-14	1	FRONT PORCH	60-100	1/4" Panel	FRONT PORCH
D-15	1	FRONT PORCH	60-100	1/4" Panel	FRONT PORCH
D-16	1	FRONT PORCH	60-100	1/4" Panel	FRONT PORCH
D-17	1	FRONT PORCH	60-100	1/4" Panel	FRONT PORCH
D-18	1	FRONT PORCH	60-100	1/4" Panel	FRONT PORCH
D-19	1	FRONT PORCH	60-100	1/4" Panel	FRONT PORCH
D-20	1	FRONT PORCH	60-100	1/4" Panel	FRONT PORCH
D-21	1	FRONT PORCH	60-100	1/4" Panel	FRONT PORCH
D-22	1	FRONT PORCH	60-100	1/4" Panel	FRONT PORCH
D-23	1	FRONT PORCH	60-100	1/4" Panel	FRONT PORCH
D-24	1	FRONT PORCH	60-100	1/4" Panel	FRONT PORCH
D-25	1	FRONT PORCH	60-100	1/4" Panel	FRONT PORCH

EX-1.6.1 & H
5-98-331



UPPER (STREET) LEVEL FLOOR PLAN
SCALE: 1/4" = 1'-0"

BILLOWVISTA DRIVE

REVISED

PROJECT

HUFF PROJECT
8125 W. 10TH AVE.
PLATEAU COMMUNITY CENTER
PLATEAU, MONT. CALIF.

SILVERSTON
DESIGN
STUDIO

6000 W. 10TH AVE.
PLATEAU, MONT. CALIF. 94066
TEL: 415 948 8888
FAX: 415 948 8888

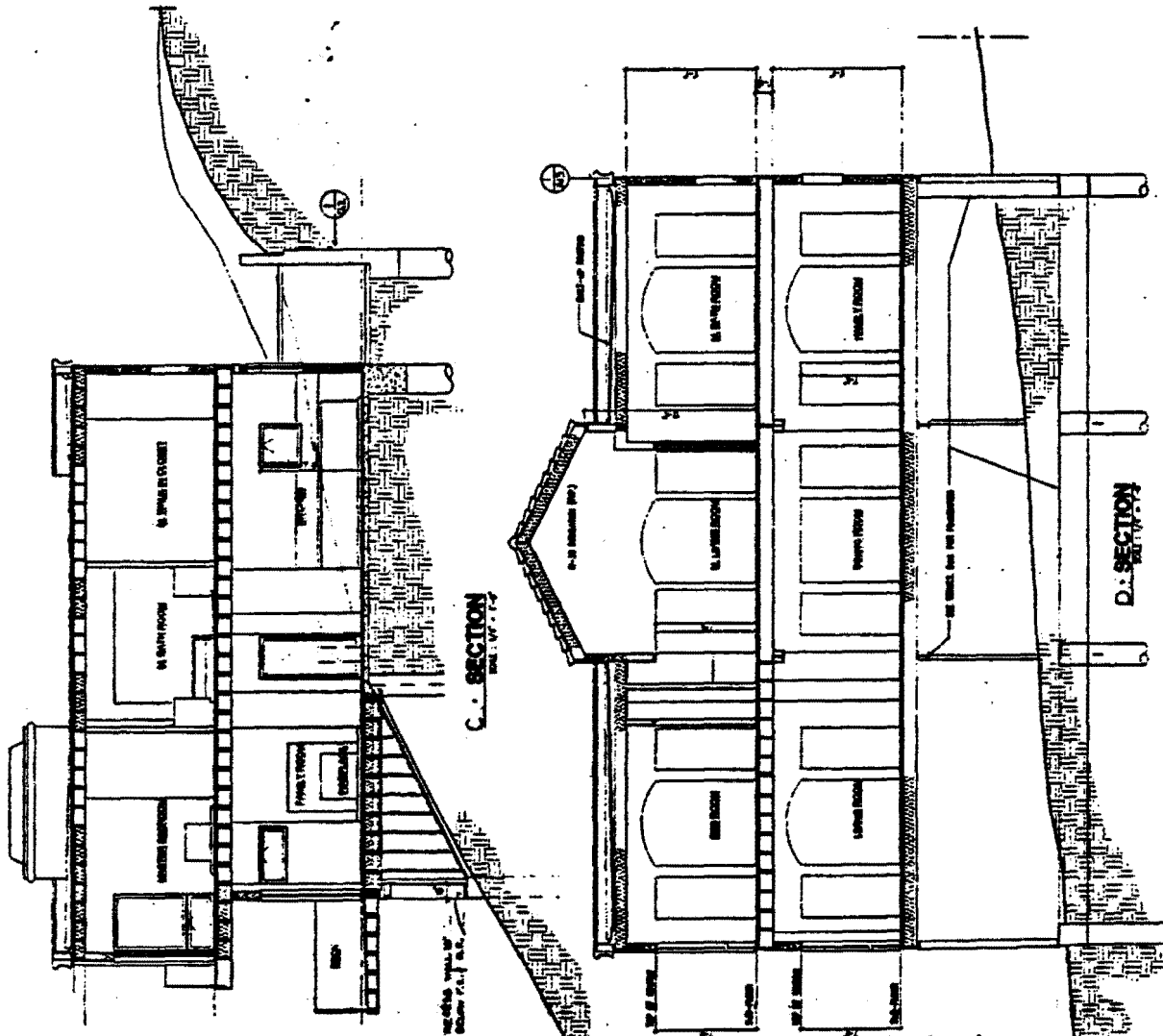
TITLE

DATE

1.1.76

SHEET

A-11



5-98-331 Exhibit I

REVISED

PROJECT

HUFFY PROJECT
MICHIGAN & ACADIA
4349 MILLICENT DRIVE
PLANT HILL, N.Y. 14130

SILVERSTON
DESIGN
STUDIO

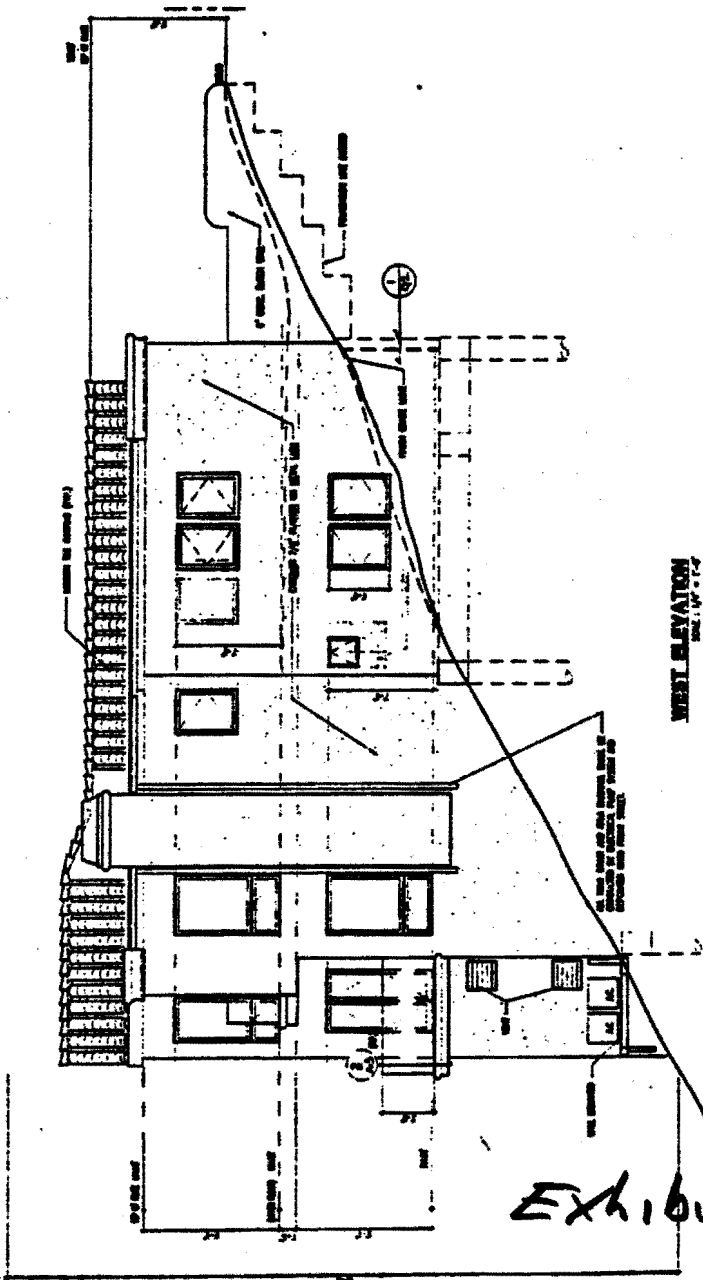
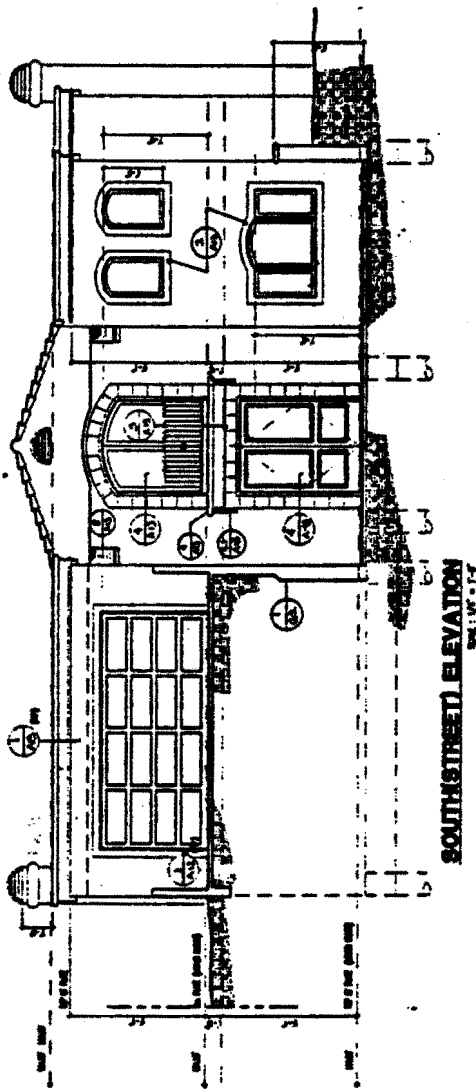
6000 WASHINGTON
ANN ARBOR MI 48106
PHONE 313 963 0900
FAX 313 963 0920
OR 313 316 0000

TITLE
1.1.76

DATE

SHEET

A-8



Exhibit

5-98-331

REVISED

PROJECT

HUFFY PROJECT
1525 W. 10TH AVENUE
DENVER, CO 80202
PHONE 303 733 1111

SILVERSTON
DESIGN
STUDIO

800.555.5555
303.733.1111
1525 W. 10TH AVENUE
DENVER, CO 80202

TITLE

1.1.16

DATE

SHEET

A-9

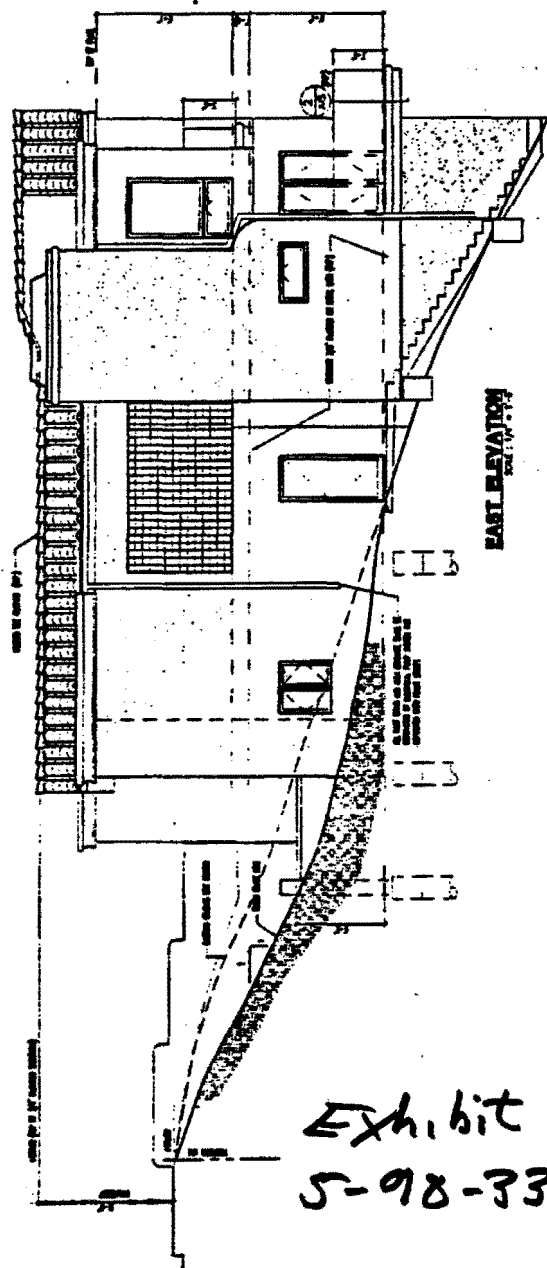
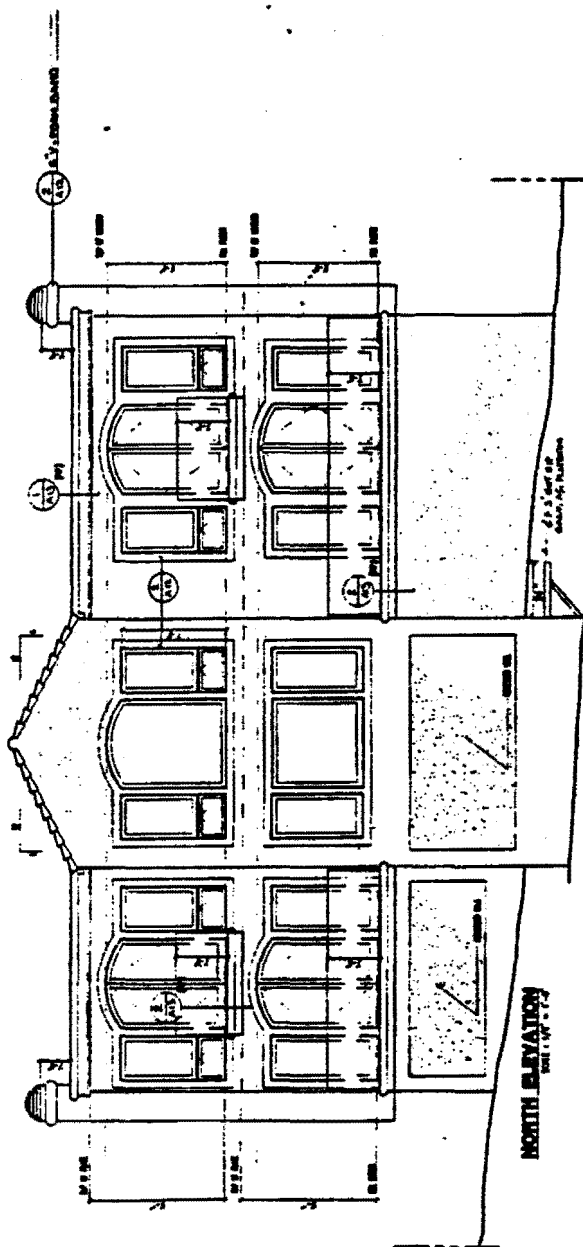


Exhibit K
5-98-331

REVISED

PROJECT

HUFF PROJECT
REYNOLDS & ALLEN
1200 BELLAVILLE AVE
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SILVERSTON
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STUDIO

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BLDG. 1000
DALLAS, TEXAS 75243
TEL: 214 450 1000
FAX: 214 450 0000

TITLE

DATE

1.1.78

SHEET

A-10

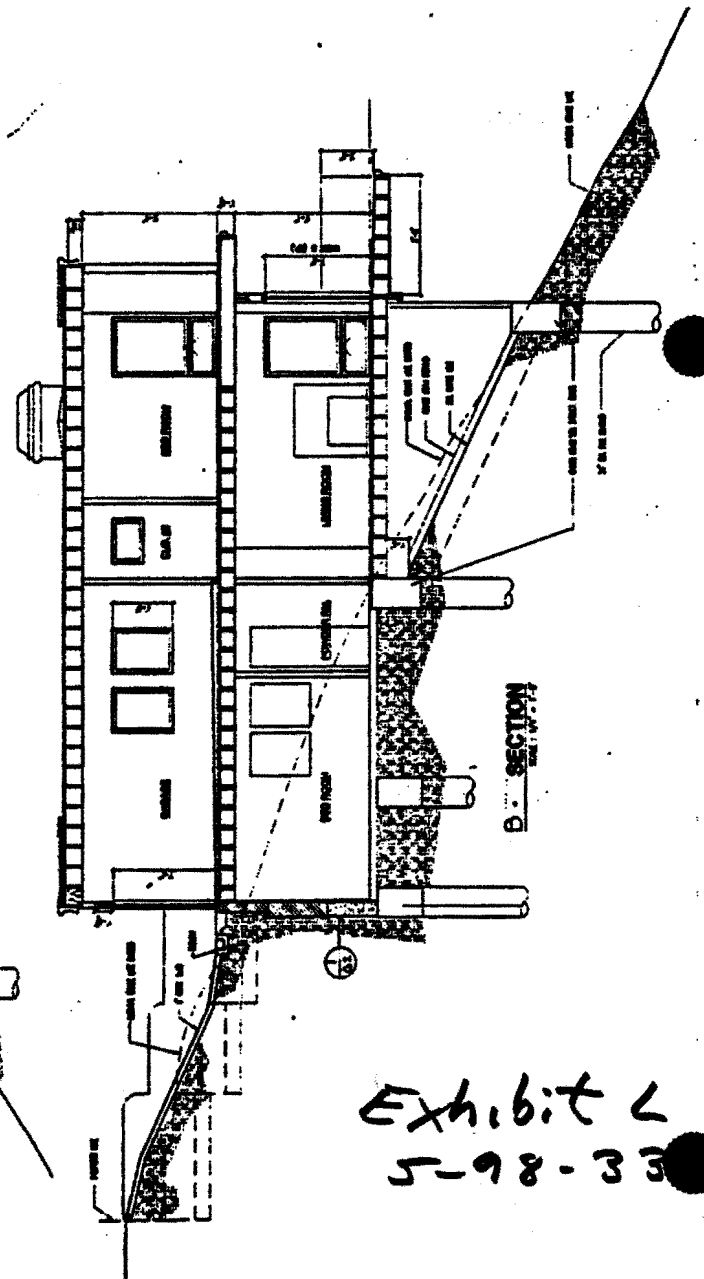
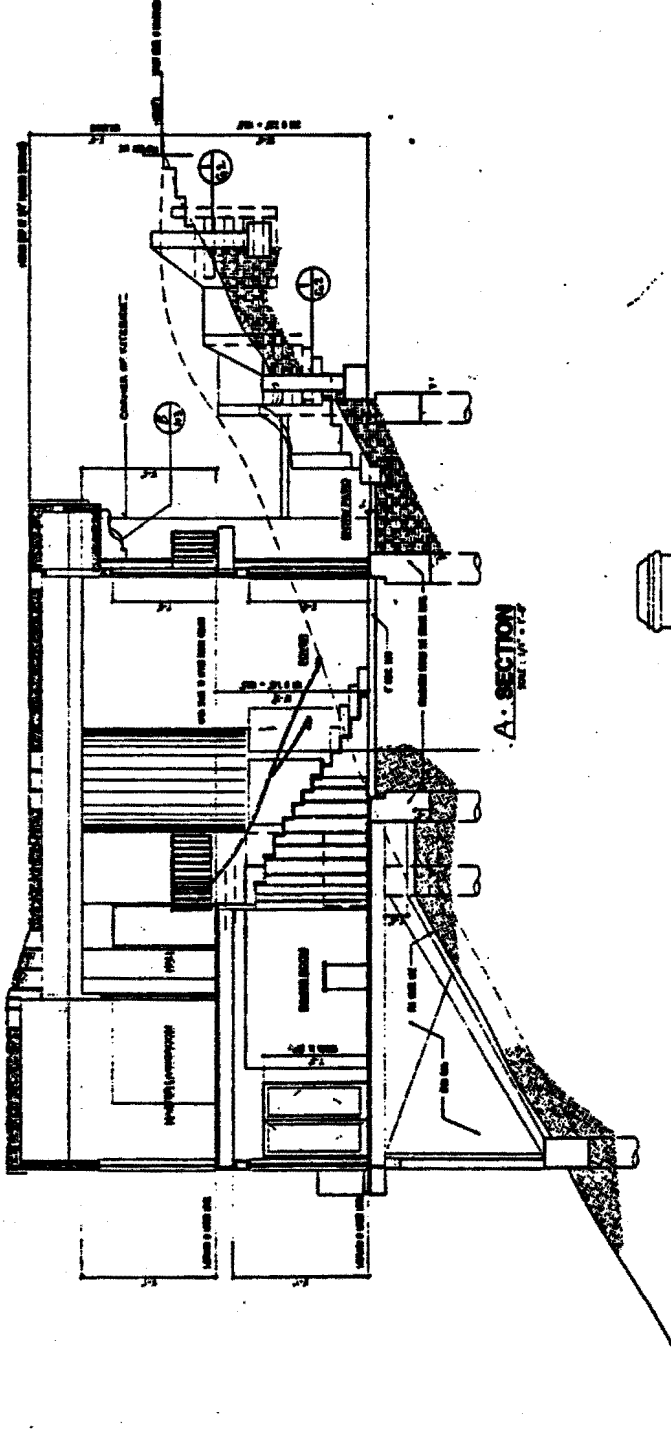


Exhibit L
5-98-33