

CALIFORNIA COASTAL COMMISSION

SAN DIEGO AREA

3111 CAMINO DEL RIO NORTH, SUITE 200

SAN DIEGO, CA 92108-1725

521-8036



W219

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Filed: December 10, 1998
49th Day: January 28, 1999
180th Day: June 8, 1999
Staff: EL-SD
Staff Report: December 14, 1998
Hearing Date: January 12-15, 1999

REGULAR CALENDAR
STAFF REPORT AND PRELIMINARY RECOMMENDATION

Application No.: 6-98-117

Applicant: J. Gary Burke
James and Joyce Allen
John and Mary Hagestad

Description: Removal of existing riprap revetment and construction of a 170-foot long vertical sheetpile seawall to protect three existing single-family residences along the Del Mar shoreline.

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|------------------|------------------------------------|
| Zoning | R1-5B |
| Plan Designation | Medium Density Residential - Beach |
| Ht abv msl | Varies from 13.9 to 16.5 feet |

Site: 2712, 2720 and 2728 Ocean Front, Del Mar, San Diego County.
APNs 299-021-06, 07 and 08

Substantive File Documents: Certified City of Del Mar LCP Land Use Plan

STAFF NOTES:Summary of Staff's Preliminary Recommendation:

Staff recommends approval of the proposed seawall with special conditions addressing future maintenance or modifications, suitable building materials, construction methods/timing, the applicants' assumption of risk, submittal of as-built plans and timing of riprap removal. Potential issues raised by the project are temporary and permanent impacts on public access, site stability and impacts on visual resources. These issues are all resolved through project design and special conditions.

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 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. Maintenance/Seaward Extension Requires Permit. Any change in the design of the wall or future additions or reinforcement seaward of the wall, including placement of rock, boulders or footings will require a coastal development permit. Maintenance of the protective works shall be the responsibility of the applicants. If after inspection, it is apparent repair or maintenance is necessary, the applicants should contact the Commission office to determine whether permits are necessary.

2. Construction Materials. Disturbance to sand and intertidal areas shall be minimized. Beach sand excavated shall be redeposited on the beach. Local sand, cobbles or shoreline rocks shall not be used for backfill or construction material. The permittees shall remove from the beach and seawall area any and all debris that results from the construction period.

3. Assumption of Risk. PRIOR TO THE ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, each 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 hazard from storms, wave runup and flooding, and the applicant assumes the liability from such hazards; and (b) the applicant unconditionally waives any claim of liability on the part of the Commission or its successors in interest for damage from such hazards 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 document 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. This deed restriction shall not be removed or changed without a Coastal Commission-approved amendment to this coastal development permit unless the Executive Director determines that no amendment is required.

4. Construction Access/Staging Area/Project Timing. PRIOR TO THE ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicants shall submit plans showing the locations, both on- and off-site, which will be used as staging and storage areas for materials and equipment during the construction phase of this project. The staging/storage plan shall be subject to review and written approval of the Executive Director. Use of public parking areas, including on-street parking, for the interim storage of materials and equipment shall not be permitted and use of sandy beach shall be minimized to the extent possible. The plan shall also indicate that no work may occur on sandy beach during the summer months (Memorial Day weekend to Labor day) of any year.

5. As-Built Plans. Within 60 days following completion of the project, the permittee shall submit for review and written approval of the Executive, as-built plans of the approved seawall that are in substantial conformance with the plans submitted with this application by Group Delta Consultants, dated April 6, 1998. Said plans shall include a certification by a registered civil engineer, acceptable to the Executive Director, verifying the seawall has been constructed in conformance with the approved plans for the project.

6. Timing of Riprap Removal. Within 30 days following completion of the project, and in no case later than May 28, 1999, all riprap shall be removed from the beach seaward of the subject sites.

IV. Findings and Declarations.

The Commission finds and declares as follows:

1. Detailed Project Description. The applicants are proposing removal of existing riprap and construction of a 170-foot-long vertical sheetpile seawall along an approximately half-block stretch of the Del Mar shoreline. It will extend in front (seaward) of three private properties between 2712 and 2728 Ocean Front, connecting with existing seawalls at either end. The seawall will be 2-ft., 9-in. thick and will be located with its western face on the Shoreline Protection Area (SPA) line delineated in the certified City of Del Mar LCP Land Use Plan and the City's Beach Overlay Zone; thus, the proposed seawall will be located entirely on private property. No encroachment is proposed seaward of the SPA line, and existing encroachments (the riprap revetment) will be removed through the proposed project. All removed materials will be disposed of at Regional Materials Recovery Inc. in Vista, CA. The seawall foundations will extend down to elevation -24 feet mean sea level (msl). The visible portion of the seawall, which is located between 27th and 29th Streets, will vary according to the level of beach sand and individual homeowner's desires to maintain private views. The elevation of the top of the seawall cap will range from approximately 13.9 feet msl to approximately 16.5 feet msl, according to the submitted application. The standard of review for the proposed development is Chapter 3 policies of the Coastal Act.

2. Geologic Conditions and Hazards. Section 30235 of the Coastal Act states, in part:

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 of the Coastal Act states, in part:

New development shall:

- (1) Minimize risks to life and property in areas of high geologic, flood, and fire hazard.
- (2) Assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area

Coastal Act Section 30235 acknowledges that seawalls, revetments, cliff retaining walls, groins and other such structural or "hard" solutions alter natural shoreline processes. Thus, such devices are required to be approved only when necessary to protect existing structures. The Coastal Act does not require the Commission to approve shoreline altering devices to protect vacant land or in conjunction with construction of new development. A shoreline protective device proposed in those situations is likely to be inconsistent with various Coastal Act policies. For example, Section 30253 addresses new development and requires that it be sited and designed to avoid the need for protective devices.

Additionally, the Commission has often times interpreted Section 30235 to require the Commission to approve shoreline protection for existing principal structures only. The Commission must always consider the specifics of each individual project but has found, in many instances, that accessory structures such as patios, decks and stairways are not required to be protected under Section 30235. In addition, such improvements can usually be found capable of withstanding periodic inundation, such as happens from time to time with any shoreline development. The subject private properties have at-grade (i.e., close to beach level) accessory improvements between the existing principal structures (the existing residences) and the proposed seawall.

Pursuant to Section 30253 of the Coastal Act, new development in hazardous areas such as the Del Mar shoreline, must be setback a distance that is sufficient to avoid or minimize exposure to the hazard, which in this case is flooding during winter storms and damages from wave action. The certified LUP for Del Mar identified 15 feet from the Shoreline Protection Area (SPA) line, which is contiguous with the western private property lines in this area of Del Mar, as the setback that is sufficient to allow

construction of a shoreline protective device (vertical seawall) that does not encroach on public beach, and thus protect shoreline homes from flood and wave hazards. However, nearly all the properties along the shoreline between Fifteenth Street and the San Dieguito River mouth were developed with residential or commercial uses prior to the Coastal Act and prior to the City's establishment of a 15-foot setback requirement. Thus, new construction primarily consists of redevelopment of previously-built sites and infill of the very few remaining vacant lots. When this occurs, the City requires compliance with the 15-foot setback. Many existing principal structures, however, are not setback this distance from their western property lines. Moreover, most of the previously-built sites already have some form of existing shoreline protective device, either vertical seawalls, riprap revetments or both.

The vertical seawall is proposed to protect existing homes. A report has been submitted by the applicants' geotechnical consultant verifying the necessity of providing shoreline protection for the existing residential structures. The geotechnical report addresses the appropriateness of the selected seawall design, which minimizes encroachment onto sandy beach while maximizing protection of the homes consistent with maintaining private ocean views. The seawall has been designed to withstand storms of the magnitude of the 1982-83 winter season, as well as the more recent, but less severe, El Nino storms of 1997-1998, although overtopping can still be expected to occur during severe storms. Based on the submitted plans, the existing homes on the three subject properties are setback approximately 20 feet from their western property lines. Thus, the vertical seawall can be constructed within the private properties. According to the geotechnical report, the design scour depth is -4.0 feet msl; the seawall tip will extend twenty feet below that to -24 feet msl to provide sufficient embedment for seawall stability. As stated previously, seawall height will vary from approximately 13.9 feet msl to approximately 16.5 feet msl, depending on the ground surface elevations landward of the proposed seawall alignment, which range from 10.8 feet msl to 11.8 feet msl. In other words, the top of the proposed seawall will be approximately 3 to 5 feet above any adjacent at-grade private improvements.

The project site is located on the beachfront in an area that has been subject to storm waves. Section 30235 cited above allows for shoreline protective devices only when required to protect existing structures in danger from erosion and when designed to mitigate impacts on shoreline sand supply. The primary issue which has been identified and addressed in the review of proposals for shoreline protective works in this area of Del Mar has been their location and alignment more than the question of their necessity. It has been recognized for some time that all of the low-lying lots between Seagrove Park and the mouth of the San Dieguito River are and most likely will continue to be subject to impacts from storm waves. The vast majority of the residences in the area are protected by some form of device, and with very few vacant lots in the vicinity, new seawalls represent infill development. Thus, if properly designed, they can be found consistent with Section 30235 of the Act. It is understood that all designs of shoreline protection, when placed in an intertidal area, do affect the configuration of the shoreline and the beach profile and do have an adverse impact on the shoreline. These impacts have been addressed by the City of Del Mar through a comprehensive approach.

A number of adverse impacts to public resources (sandy beach and recreational access in many cases) are generally associated with the construction of shoreline structures. In this particular case, the natural shoreline processes referenced in Section 30235 of the Coastal Act, such as the retention of sandy beaches, will be altered to some degree by construction of a seawall. However, the seawall will not be located on public beach, and thus will not usurp sandy area otherwise available for public recreation. A statewide comprehensive approach to impacts on sand supply and public access has been developed recently. The Beach Sand Mitigation Program has been implemented in several areas of San Diego County, and elsewhere in the state, to offset the adverse impacts of shoreline protection devices. The program includes a formula to calculate an in-lieu fee based on an individual project's quantifiable impacts; the monies are then expended on beach nourishment projects in the general project area.

Within the City of Del Mar, however, a mitigation program was already in place prior to adoption of the Beach Sand Mitigation Program. In April, 1988 the Beach Preservation Initiative was adopted, and is included in the City's certified LUP and draft implementation program as the Beach Overlay Zone. It established designs and alignments for new shoreline protective works and required the removal of existing beach encroachments within the area identified as the Shoreline Protection Area (SPA). It included setbacks to establish a new stringline of development which would accommodate necessary shoreline protection while minimizing private encroachment onto sandy beach and required a user fee for any encroachments seaward of the SPA line. In the subject location, the SPA line and western property lines are contiguous.

In the case of the subject seawall, the proposed wall design and alignment represents the comprehensive solution the City of Del Mar has devised to address its several blocks of existing shoreline structures and the adjacent public beach and streetend accessways. Since the SPA line was delineated and the Beach Overlay Zone adopted through public initiative in the 1980s, most previously existing private encroachments on public beach have been removed. The Del Mar shoreline had been comprised of an assortment of shoreline protective devices, many incorporating extensive riprap revetments. In addition, many private accessory uses had proliferated behind the various protective devices, usurping significant areas of public beach for private use. As these encroachments have been removed, the City and Coastal Commission have permitted the construction of vertical seawalls to protect the existing developed properties. Although there have been a few seawalls permitted for individual sites, others have included a number of contiguous properties, extending one or more city blocks and including protection of the intervening public streetends as well. In those cases where individual seawalls have been authorized, they generally represent infill connecting to adjacent existing seawalls of the approved design.

In promoting its comprehensive solution for shoreline protection, the City has devised its own program to mitigate the impacts to sand supply and available beach area associated with any seawall approved on public beach. This mitigation is in the form of funding/construction by the private property owners receiving the benefit of shoreline

protection of public streetend seawall and access improvements which benefit the general public. The City has found that this form of mitigation is mutually beneficial and that the costs are roughly proportional to fair market rental rates for the amount of encroachment involved amortized over the expected life of the seawalls. This approach is consistent with the City's certified LUP, which requires that a user fee be applied to any encroachments seaward of the SPA line, and the mitigation has been applied to several recent seawall approvals through the City. However, in this particular case, the mitigation does not apply, since the seawall is proposed to be located entirely within private property and thus does not represent an impact on sand supply or an encroachment onto public beach.

In summary, the applicants have documented the need for shoreline protection through a current geotechnical report. The report still identifies the 1982-83 winter as the appropriate reference year for designing an adequate protective device. The past winter (1997-1998) was again an El Nino year, but the same combination of high tides and storm surge did not occur as it did in 1982-83. Although there were a few individual losses to homes in San Diego County (with four homes on the Del Mar shoreline suffering severe damages), the widespread devastation which occurred in 1982-83 did not occur last winter. The proposed seawall is designed to withstand storms of the 1982-83 intensity, yet is also designed to avoid encroachment onto public beach. In addition, the seawall will infill a "gap" between two existing seawalls. The Commission finds that construction of the proposed seawall is appropriate under Section 30235 of the Coastal Act, and that there are no associated impacts on sand supply and beach availability, since the seawall is proposed on private property. Special conditions are included addressing construction timing and methods, future maintenance activities and development in hazardous areas.

Although many repair and maintenance activities are exempt from coastal development permit requirements under Section 30610(d), such activities that enlarge or expand a structure are not exempt. In addition, certain methods of repair and maintenance of seawalls are not exempt (see California Code of Regulations Section 13252). Special Condition #1 advises the applicants that ongoing maintenance and repair activities which may be necessary in the future could require permits. The Coastal Commission should be contacted prior to undertaking any repairs to determine permit requirements. Moreover, the applicants are proposing to construct the development in an area subject to wave and storm hazards. Although the applicants' geotechnical report asserts that the proposed development can withstand such hazards and protect existing development from such hazards, the risk of damage to the structure and the existing development cannot be eliminated entirely. The Commission finds that in order for the proposed development to be consistent with the Coastal Act, the applicants must assume the risks of damage from flooding and wave action. As such, Special Condition #3 requires the applicants to execute assumption of risk documents, waiving any liability on the part of the Commission for approving the proposed development. In addition, these conditions require the applicants to indemnify the Commission in the event that third parties bring an action against the Commission as a result of failure of the proposed development to

withstand and protect against the hazards. As conditioned, the Commission finds the proposed seawall consistent with Sections 30235 and 30253 of the Act.

3. Public Access and Recreation. The Coastal Act emphasizes the need to protect public recreational opportunities and to provide public access to and along the coast. The following Coastal Act policies, which address the protection of public access and recreational opportunities, are most applicable to the proposed development:

Section 30210

In carrying out the requirements of Section 4 of Article X of the California Constitution, maximum access, which shall be conspicuously posted, and recreational opportunities shall be provided for all the people consistent with public safety needs and the need to protect public rights, rights of private property owners, and natural resource areas from overuse.

Section 30211

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.

Section 30212

(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....

Section 30213

Lower cost visitor and recreational facilities shall be protected, encouraged, and, where feasible, provided. Developments providing public recreational opportunities are preferred.

Section 30223

Upland areas necessary to support coastal recreational uses shall be reserved for such uses, where feasible.

The Del Mar beach is a popular visitor destination for local and regional beachgoers. Historically, there has been a wide, sandy, public beach in Del Mar, varying somewhat season to season, but typically wider than many other North County beaches. Public

access is generally available at every streetend from Fifteenth Street to the San Dieguito River mouth.

In the past, private encroachments onto the public beach, both shoreline protective works and deck/patio improvements, had restricted public access to some degree, usurping areas that would otherwise have been available to the public for beach play and sunbathing. For the most part, these encroachments have now been removed and the beach is open and available extending inland to the SPA line, which coincides with the western property lines of private properties in most locations including the subject site. Unlike most of the Del Mar shoreline, however, areas of riprap still remain on the public beach seaward of the subject properties. Maintaining the beach for public recreational pursuits and providing adequate access thereto is a prime concern of both the City and the Coastal Commission. The citizens of Del Mar created the Beach Overlay Zone pursuant to the initiative process, and the City enacted guidelines for its implementation, with the removal of private encroachments and attendant enhancement of public access a key goal. The provisions of the zone, and the guidelines, are part of the City's certified LUP.

The proposed vertical concrete seawall design, utilizing no toestone or riprap component, has been promoted by the City of Del Mar through the local permit process and endorsed by the Coastal Commission in several past permits, including CDPs #6-91-127, #6-88-542, #6-97-141 and #6-98-65, all of which authorized seawalls which extended across all, or portions of, two city blocks plus intervening streetends. In addition, CDPs #6-89-305, #6-90-022, #6-91-230, #6-94-122 and #6-95-134 authorized the same seawall design on individual sites as infill development. The remainder of the Del Mar shoreline has a mix of older walls and riprap revetments, with a few unprotected sites intermingled with the rest. All of the recently approved seawalls have been constructed in one (or a combination) of three alignments: entirely on private property, centered on the SPA line, or encroaching a maximum of 2-ft., 9-in. (the thickness of the seawall) onto public beach. Most of the older protective devices are also roughly aligned on the SPA line, since Del Mar has abated nearly all prior encroachments in recent years. An exception is the northernmost block in the City, where existing riprap extends a significant distance onto public beach; it is anticipated this revetment will be replaced with a vertical wall in the near future. Minimal encroachments onto public beach have been allowed in those instances when existing residences are setback less than 15 feet from the SPA line; where existing homes are closer than 15 feet to the construction site, the actual construction of the seawall (which involves pile-driving) could cause damage to the homes.

At the subject site, the existing homes are setback a sufficient distance (approximately 20 feet) to allow construction of the proposed seawall entirely on private property. In addition, the existing riprap seaward of the three homes will be removed as part of the subject proposal; Special Condition #6 requires that the removal be completed within thirty days of project completion or no later than May 28, 1999 (the start of Memorial Day weekend). Moreover, the beach sands for 30 feet seaward of the SPA line will then be sifted to a depth of +4 msl (pursuant to the City's Shoreline Protection Permit) to assure that all rock particles have been located and removed.

Typically, the Commission, whenever it approves nearshore construction projects, prohibits use of public beaches, roads, parking areas, etc. as staging or storage areas during the summer beach season, and minimizes such use at other times of year. Special Condition #4 addresses this issue, prohibiting construction between Memorial Day weekend and Labor Day and requiring that use of sandy beach for construction purposes be minimized.

In summary, the Commission finds that the project provides and enhances public access opportunities through the removal of existing riprap encroachments on public beach. A special condition prohibits summertime construction. Another special condition prohibits use of beach sand as construction material, thus preserving beach materials for recreational use. Therefore, the Coastal Commission finds the proposed development consistent with the cited Coastal Act access policies, and, since the proposed development is located between the sea and first public road, consistent with all other public access and recreation policies as well, as required in Section 30604(c).

4. Visual Resources. Section 30251 of the Coastal Act provides for the protection of scenic coastal resources, and states, in part:

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 seawall will be located on and adjacent to the public beach of Del Mar. The amount of seawall visible above the sand will vary from season to season, as the sand supply diminishes and returns. During the summer season when sand levels are highest and the beach receives the greatest intensity of use, no more than about three to five feet of the seawall will generally be visible. This is because the wall height, which varies slightly from property to property, is dictated by the adjacent shoreline property owners' desires to maintain their first-floor (and deck and patio) ocean views, and, during summer, beach elevations are roughly equal to the ground level of those private properties. More of the seawall will be visible during the winter, when beach sand levels have dropped below the level of the adjacent private properties.

The design of the seawall is virtually identical to other existing seawalls along the Del Mar coast which have been constructed in recent years and gives the general appearance of a garden wall enclosing private deck and patio improvements on the adjacent sites. Since there has been one form or another of shoreline protection along most of the Del Mar coastline over the years, the subject seawall will not present a significantly different appearance and will be visually compatible with the general patterns of nearby development. Therefore, the Coastal Commission finds the proposed seawall, as conditioned to address other concerns, consistent with Section 30251 of the Act.

5. Local Coastal Planning. Section 30604(a) 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 for the proposed development, as conditioned.

The specific project site is zoned R1-5B and is designated for Medium Density Single-Family Residential development. The proposed seawall is consistent with those designations as a necessary accessory use to protect existing principal structures in danger from storms and wave action. The certified City of Del Mar LCP Land Use Plan allows for shoreline protective devices subject to strict design and siting criteria; the subject proposal meets those requirements. As conditioned, the proposed project is also consistent with all applicable Chapter 3 policies of the Coastal Act. Thus, the proposed development will not prejudice the ability of the City of Del Mar to complete preparation of its implementation program and attain a fully-certifiable local coastal program.

6. 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)(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 effect which the activity may have on the environment.

The proposed project has been found consistent with the hazards, public access and visual resource 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, as conditioned, 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:

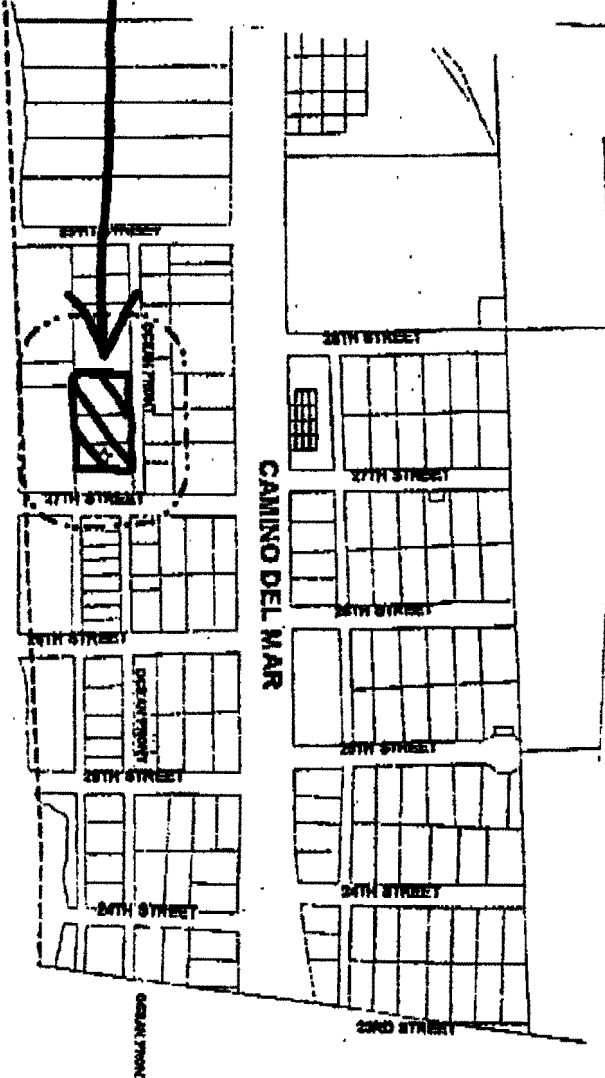
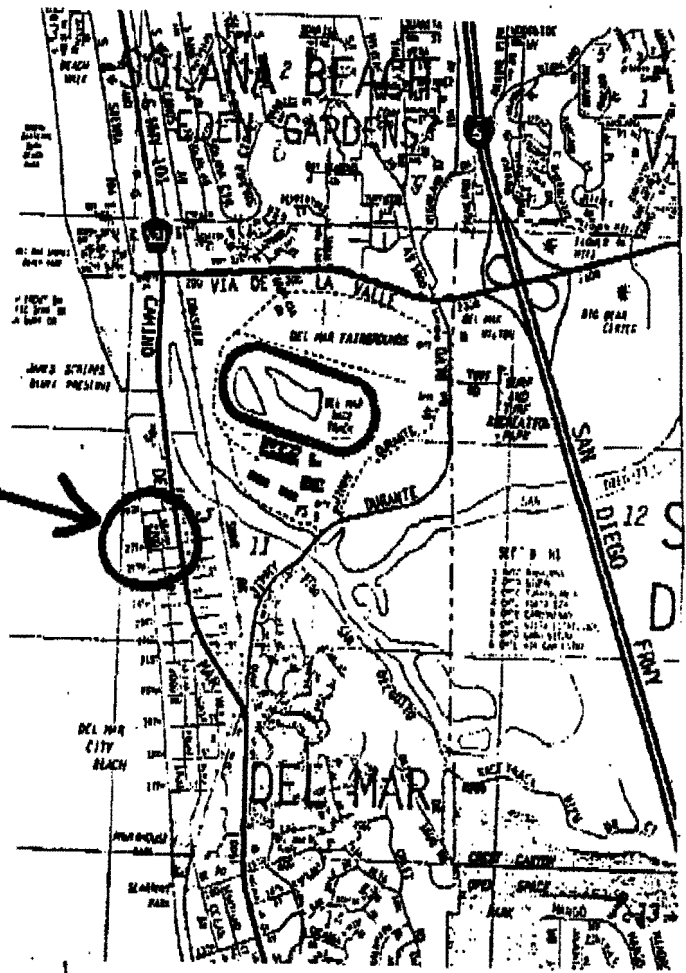
1. Notice of Receipt and Acknowledgment. The permit is not valid and development shall not commence until a copy of the permit, signed by the permittee or authorized agent, acknowledging receipt of the permit and acceptance of the terms and conditions, is returned to the Commission office.
2. Expiration. If development has not commenced, the permit will expire two years from the date 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. Compliance. 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. 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 development during construction, 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.

(6-98-117 Burke stfrpt)

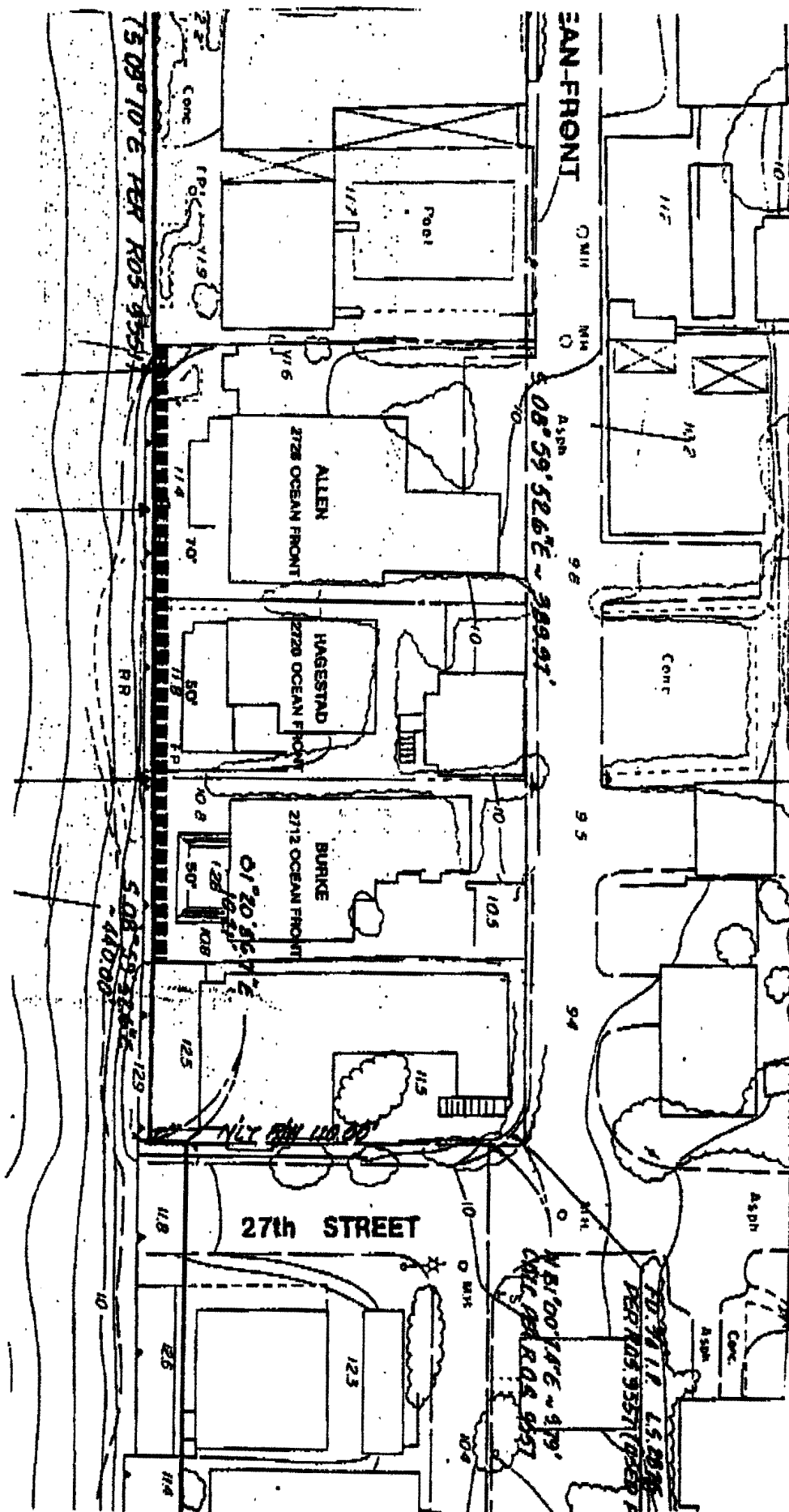
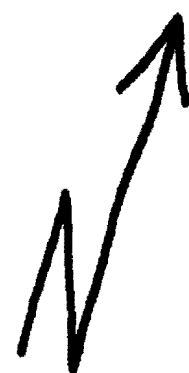
6-98-117

Site



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| EXHIBIT NO. 1 |
| APPLICATION NO. |
| 6-98-117 |
| Vicinity Maps |
| California Coastal Commission |

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| EXHIBIT NO. 2 |
| APPLICATION NO. |
| 6-98-117 |
| Site Plan |
| California Coastal Commission |

6-98-117

