

CALIFORNIA COASTAL COMMISSION

South Coast Area Office
 200 Ocean Gate, Suite 1000
 Long Beach, CA 90802-4302
 590-5071

Filed: 10/20/1999
 49th Day: 12/8/1999
 180th Day: 4/17/2000
 Staff: CP-LB
 Staff Report: 11/17/1999
 Hearing Date: December 9, 1999
 Commission Action:



CP

STAFF REPORT: MATERIAL AMENDMENT

APPLICATION NUMBER: 5-98-354-A1

APPLICANT: Los Angeles County Department of Public Works

AGENT: James Enriquez, Design Division

PROJECT LOCATION: On beach at terminus of Market Street, Venice, City of Los Angeles, Los Angeles County

DESCRIPTION OF PROJECT ORIGINALLY APPROVED ON APRIL 13, 1999:

Modify existing storm drain outlet on beach, including: abandonment of old headwall in place, replace 8 feet of pipe with new 66" reinforced concrete pipe (RCP), encase old and new pipe in concrete, and reposition rocks of existing breakwater.

DESCRIPTION OF AMENDMENT REQUEST:

Revise the previously approved plan to include the installation of a rubber check valve within the pipe (to prevent sand from clogging the outlet) instead of reconfiguring the end of the existing storm drain outlet and breakwater.

SUMMARY OF STAFF RECOMMENDATION:

The proposed project is located seaward of the actual mean high tide line on publicly owned tidelands that the state has legislatively granted to the City of Los Angeles. A coastal development permit is required from the Commission because the proposed development is located within the Commission's area of original jurisdiction. Pursuant to Section 30519 of the Coastal Act, any development located within the Commission's area of original jurisdiction requires a coastal development permit issued by the Commission. The Commission's standard of review for the proposed development is the Chapter 3 policies of the Coastal Act.

Staff is recommending that the Commission grant the coastal development permit amendment for the proposed development with special conditions to protect public recreational opportunities, water quality, and sensitive species. The permittee agrees with the recommendation.

SUBSTANTIVE FILE DOCUMENTS:

1. Coastal Development Permit 5-98-354 (L.A. Co. Dept. of Public Works).
2. California Department of Fish & Game Letter, 10/13/98.
3. California Regional Water Quality Control Board Letter, 10/20/98.
4. California State Lands Commission Letter, 1/8/99.
5. U.S. Army Corps of Engineers Letter, 9/30/98 (No. 98-00663-TJE).

STAFF RECOMMENDATION:

The staff recommends that the Commission adopt the following resolution to **APPROVE** the permit amendment application with special conditions:

MOTION

"I move that the Commission approve with special conditions Coastal Development Permit Amendment 5-98-354-A1 per the staff recommendation as set forth below."

Staff recommends a **YES** vote which would result in the adoption of the following resolution and findings. An affirmative vote by a majority of the Commissioners present is needed to pass the motion.

I. RESOLUTION: Approval with Conditions

The Commission hereby **GRANTS** an amendment to the permit, subject to the conditions below, for the proposed development on the grounds that the development and the amendment 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, is located between the sea and the first public road nearest the shoreline and is in conformance with the public access and public recreation policies 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. Timing of Project

In order to reduce impacts on the grunion and the California least tern during the grunion breeding runs and the California least terns' nesting and foraging season, no work or construction activity shall occur during the period commencing March 15 and ending September 1.

2. Beach and Recreational Facility Closures

Beach area closures shall be minimized and limited to areas immediately adjacent to the project area (within 300 feet of the pipeline and breakwater). All beach areas and recreation facilities outside of the 300-foot radius shall remain open and available for public use during the normal operating hours. The beach bicycle path shall remain open and available for public use during normal operating hours.

3. Conformance with the Requirements of the Resource Agencies

(S&E)

The permittee shall comply with all permit requirements and mitigation measures of the California Department of Fish and Game, Regional Water Quality Control Board, U.S. Army Corps of Engineers, and the U.S. Fish and Wildlife Service with respect to preservation and protection of water quality and marine environment. Any change in the approved project which are required by the above-stated agencies shall be submitted to the Executive Director in order to determine if the proposed change shall require a permit amendment pursuant to the requirements of the Coastal Act and the California Code of Regulations.

4. Assumption of Risk

By acceptance of this permit amendment, the permittee acknowledges and agrees: (i) that the site may be subject to hazards from seismic events, liquefaction, storms, waves, floods and erosion; (ii) to assume the risks to the permittee and the property that is the subject of this permit of injury and damage from such hazards in connection with this permitted development; (iii) to unconditionally waive any claim of damage or liability against the Commission, its officers, agents, and employees for injury or damage from such hazards; and (iv) to indemnify and hold harmless the Commission, its officers, agents, and employees with respect to the Commission's approval of the project against any and all liability, claims, demands, damages, costs (including costs and fees incurred in defense of such claims), expenses, and amounts paid in settlement arising from any injury or damage due to such hazards.

IV. Findings and Declarations

The Commission hereby finds and declares:

A. Project Description

The proposed project involves improvements and repairs to an existing storm drain pipeline to minimize plugging of the outlet due to sand accumulation (Exhibit #2). The work on the approved project commenced in September 1999, but is currently on hold while this amendment request is being processed for the proposed revisions which are necessary due to difficulties discovered during construction. The revisions proposed by this amendment would reduce the amount of construction and breakwater alterations that would occur at the terminus of the existing storm drain pipe (Exhibit #3).

The originally approved project includes: 1) replacement of a rusted steel structure in the pipeline with a new pressure manhole structure; 2) abandonment of the old headwall (end of pipeline) in place; 3) replacement of eight feet of the existing pipeline with new 66" reinforced concrete pipe (RCP); 4) encasement of the pipeline in concrete; 5) anchoring the

outlet to the breakwater by grouting; and 6) repositioning the rocks of the existing breakwater (Exhibit #4).

Approval of this amendment request would delete item nos. 2 and 6 from the above-stated project description, and would include into the project the installation of a rubber check valve near the end of the pipe to prevent sand from clogging the outlet (Exhibit #5). The permittee states that the proposed check valve will eliminate the need to reconfigure the end of the existing storm drain outlet where it exits the breakwater (Exhibit #4). The proposed rubber check valve would be placed within the existing pipeline and housed in a rectangular reinforced concrete structure. The proposed 13'x 9.3' rectangular structure (that houses the check valve) would be secured on existing footings located about forty feet landward of the existing breakwater, and would extend 36 inches above the top of the pipe (Exhibits #3-5). The permittee states that a bolted steel plate covering the rectangular structure will prevent storm flows from discharging onto the beach (Exhibit #3).

The project site is located seaward of the mean high tide line on Venice Beach within the City of Los Angeles (Exhibit #2). This area of Venice is one of the most visited recreation areas on the coast of California. Ocean Front Walk, the Venice Pavilion, and the Venice Beach bicycle path are located immediately inland of the project site. The permittee proposes to complete the revised project by March 15, 2000 in order to avoid impacts to spawning grunion and summer beach goers.

The construction of the proposed project involves the use of heavy machinery on the beach for excavation of the existing pipeline. The equipment being used includes loader/bulldozers, excavators, a crane, concrete trucks, and dump trucks. The permittee has obtained a temporary construction easement across the beach from the City to allow access to the site from the City streets. A portion of the beach (less than 3.75 acres) is being used for temporary storage of excavated material during construction. The revisions proposed by this amendment request would reduce the amount of heavy machinery and construction on the beach by eliminating the need to reconfigure the existing breakwater at the end of the outfall pipe (Exhibit #4).

In order to direct the water and surf away from the construction site while the work is occurring, the permittee has constructed a temporary diversion berm around the site using beach sand. The project site will be restored to its original condition upon completion of the revised project.

B. Marine Resources

The proposed project is located on the beach and within coastal waters. The Coastal Act contains policies which address development in or near coastal waters. The standard of review for development proposed in coastal waters is the Chapter 3 policies of the Coastal Act, including the following marine resource policies. Sections 30230, 30231 and 30233

of the Coastal Act require the protection of biological productivity, public recreation and marine resources.

Section 30230 of the Coastal Act states:

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

Section 30231 of the Coastal Act states:

The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface water flow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.

Section 30233 of the Coastal Act states, in part:

- (a) The diking, filling, or dredging of open coastal waters, wetlands, estuaries, and lakes shall be permitted in accordance with other applicable provisions of this division, where there is no feasible less environmentally damaging alternative, and where feasible mitigation measures have been provided to minimize adverse environmental effects, and shall be limited to the following:
 - (1) New or expanded port, energy, and coastal-dependent industrial facilities, including commercial fishing facilities.
 - (2) Maintaining existing, or restoring previously dredged, depths in existing navigational channels, turning basins, vessel berthing and mooring areas, and boat launching ramps.
 - (3) In wetland areas only, entrance channels for new or expanded boating facilities; and in a degraded wetland, identified by the Department of Fish and Game pursuant to subdivision (b) of Section 30411, for boating facilities if, in conjunction with such boating

facilities, a substantial portion of the degraded wetland is restored and maintained as a biologically productive wetland. The size of the wetland area used for boating facilities, including berthing space, turning basins, necessary navigation channels, and any necessary support service facilities, shall not exceed 25 percent of the degraded wetland.

(4) In open coastal waters, other than wetlands, including streams, estuaries, and lakes, new or expanded boating facilities and the placement of structural pilings for public recreational piers that provide public access and recreational opportunities.

(5) Incidental public service purposes, including but not limited to, burying cables and pipes or inspection of piers and maintenance of existing intake and outfall lines.

(6) Mineral extraction, including sand for restoring beaches, except in environmentally sensitive areas.

(7) Restoration purposes.

(8) Nature study, aquaculture, or similar resource dependent activities.

Sections 30230 and 30231 of the Coastal Act require that coastal waters and marine resources shall be maintained and enhanced, and special protection shall be given to areas and species of special biological or economic significance. The proposed installation of the rubber check valve and rectangular structure will temporarily impact the existing marine habitat. Mitigation measures are necessary to protect the project site for the annual grunion spawning season. The waters in the area are also used as a foraging area for the endangered California least tern. The project site is located within two miles of the Venice Beach California least tern nesting area.

In order to reduce the proposed development's impacts on spawning grunion and the California least tern feeding area during the birds' nesting season, the permit amendment is conditioned to prohibit construction activity during the period commencing March 15 and ending September 1. The period between March 15 and September 1 is the primary grunion spawning season as well as the California least tern's nesting season. The California Department of Fish and Game and the U.S. Army Corps of Engineers routinely prohibit beach replenishment and construction activities on the beach during these times. In this case, the U.S. Army Corps of Engineers has applied the same protective condition to the proposed project. The California Department of Fish and Game has not restricted the timing of the proposed project. In any case, the permittee has proposed to complete the revised project before March 15, 2000.

The resource agencies may require further mitigation measures. Therefore, a condition of approval requires the permittee to comply with all permit requirements and mitigation

measures of the California Department of Fish and Game, Regional Water Quality Control Board, U.S. Army Corps of Engineers, and the U.S. Fish and Wildlife Service with respect to preservation and protection of water quality and marine environment. Any change in the approved project which are required by the above-stated agencies shall be submitted to the Executive Director in order to determine if the proposed changes shall require a permit amendment pursuant to the requirements of the Coastal Act and the California Code of Regulations.

The proposed project will also impact the marine environment by placing a small amount of fill in coastal waters. The proposed installation of rectangular structure that would house the rubber check valve constitutes fill in coastal waters. The area permanently impacted by the proposed fill is about 26 square feet. The proposed rectangular structure that will house the rubber check valve will occupy about 26 square feet more area than the existing pipeline section occupies where it is proposed to be installed (Exhibit #5).

Section 30233 of the Coastal Act allows filling of coastal waters and wetlands only under very limited circumstances. Under this section, any approved filling of open coastal waters must be for an allowable use, mitigation measures must be provided to minimize adverse environmental effects, and the project requiring the fill must be found to be the least environmentally damaging alternative. In this case, the proposed fill would result from the improvement to an existing storm drain pipeline on the beach (Exhibit #2).

Section 30233(a)(5) of the Coastal Act allows fill for incidental public service purposes such as maintenance of existing intake and outfall lines. The proposed fill for the repair of the existing storm drain pipeline is both incidental and for a public service purpose, and is therefore authorized pursuant to Section 30233(a)(5) of the Coastal Act. Therefore, the Commission finds that the fill necessary to undertake the proposed repair and improvement of the storm drain pipeline is allowable fill that can be permitted if there is no feasible less environmentally damaging alternative, and where feasible mitigation measures have been provided to minimize adverse environmental effects.

The proposed project is the least environmentally damaging alternative as it will prevent storm flows from discharging onto the beach, minimizes the amount of fill needed to solve the problem (sand clogging the pipe), and eliminates the need to reconfigure the breakwater at the end of the existing storm drain outlet (Exhibit #4). The existing pipeline is fixed in place and all other alternatives would include demolition, greater amounts of fill, and more construction activity on the beach than the proposed project. The recommended special conditions of approval, including the timing condition to protect the California least terns and grunion, will mitigate the potential adverse environmental effects of the proposed project. As conditioned above, the Commission finds that the proposed project is consistent with the marine resource and water quality policies of the Coastal Act.

C. Recreation and Public Access

One of the basic goals stated in the Coastal Act is to maximize and protect public access and recreation along the coast. The proposed project must conform to the public access and recreation policies contained in Chapter 3 of the Coastal Act.

Section 30210 of the Coastal Act states:

In carrying out the requirement 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 of the Coastal Act states:

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

Section 30213 of the Coastal Act states:

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

Section 30221 of the Coastal Act states:

Oceanfront land suitable for recreational use shall be protected for recreational use and development unless present and foreseeable future demand for public or commercial recreational activities that could be accommodated on the property is already adequately provided for in the area.

The construction area for the proposed project is located on Venice Beach between the water and Ocean Front Walk (Exhibit #2). Ocean Front Walk is the public boardwalk located immediately inland of the beach and Venice public recreation area. This area of Venice is one of the most visited recreation areas on the coast of California. Ocean Front Walk, the Venice Pavilion, and the Venice Beach bicycle path are located immediately inland of the project site.

The construction of the proposed project involves the use of heavy machinery on the beach to excavate the pipeline and install the proposed check valve. The heavy equipment includes loader/bulldozers, excavators, a crane, concrete trucks, and dump trucks. The permittee has obtained a temporary construction easement across the beach from the City

to allow access to the site from the City streets. A portion of the beach (less than 3.75 acres) is being used for temporary storage of excavated material during construction. The revisions proposed by this amendment request would reduce the amount of heavy machinery and construction on the beach by eliminating the need to reconfigure the existing breakwater at the end of the outfall pipe (Exhibit #4).

In order to direct the water and surf away from the construction site while the work is occurring, the permittee has constructed a temporary diversion berm around the site using beach sand. The project site will be restored to its original condition upon completion of the revised project.

Therefore, the proposed project will temporarily disrupt public use of the beach area near the project during the construction period (Exhibit #2). The sandy beach, Venice recreation area, and the beach bike path provide the public with important coastal access and recreation opportunities. The existing bicycle path is part of the regional bicycle path system which runs from Venice Beach to Santa Monica Beach and is heavily used by pedestrians and bicyclists. These public recreation resources must be protected during the construction of the proposed project.

The peak beach use season runs through the summer from May to September. Because the permittee has proposed to complete the revised project by March 15, 2000 to avoid impacts to spawning grunion, the proposed project will also avoid the summer beach use season. By completing the proposed project during the winter months, the permittee will avoid conflicts with the heavy beach crowds that are attracted to this portion of the state's coastline.

During the fall and winter months, however, the beach is still used by many visitors. Therefore, the permit is conditioned to minimize the area of beach that is closed during construction. The closed areas shall be limited to the areas immediately adjacent to the project area (within 300 feet of the pipeline and breakwater). All beach areas and recreation facilities outside of the 300-foot radius shall remain open and available for public use during the normal operating hours. The 300-foot radius encompasses the entire project site. In addition, the proposed project shall not interfere with the public's use of the beach bicycle path. The requirement to maintain public access along the bicycle path ensures that at least one lateral access path will remain available for people to pass the proposed project as they walk along the shore. Only as conditioned is the proposed project consistent with the coastal access and recreation policies of the Coastal Act.

D. Hazards

The Coastal Act states that new development must minimize risks to life and property and not create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs.

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 or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs.

Developments located in or near the ocean have the potential for damage caused by wave energy. The proposed project is located in the surf zone and is especially susceptible to wave damage. No development in the water can be guaranteed to be safe from hazard.

The Commission routinely imposes conditions for assumption of risk in areas at high risk from hazards. The condition ensures that the applicants understand and assume the potential hazards associated with development in or near the water. The same special condition has been accepted by the permittee pursuant to the Commission's April 13, 1999 approval of Coastal Development Permit 5-98-354 for the originally proposed project.

Therefore, by acceptance of this coastal development permit amendment, the permittee acknowledges and agrees: (i) that the site may be subject to hazards from seismic events, liquefaction, storms, waves, floods and erosion; (ii) to assume the risks to the permittee and the property that is the subject of this permit of injury and damage from such hazards in connection with this permitted development; (iii) to unconditionally waive any claim of damage or liability against the Commission, its officers, agents, and employees for injury or damage from such hazards; and (iv) to indemnify and hold harmless the Commission, its officers, agents, and employees with respect to the Commission's approval of the project against any and all liability, claims, demands, damages, costs (including costs and fees incurred in defense of such claims), expenses, and amounts paid in settlement arising from any injury or damage due to such hazards. Only as conditioned is the proposed project is consistent with Section 30253 of the Coastal Act.

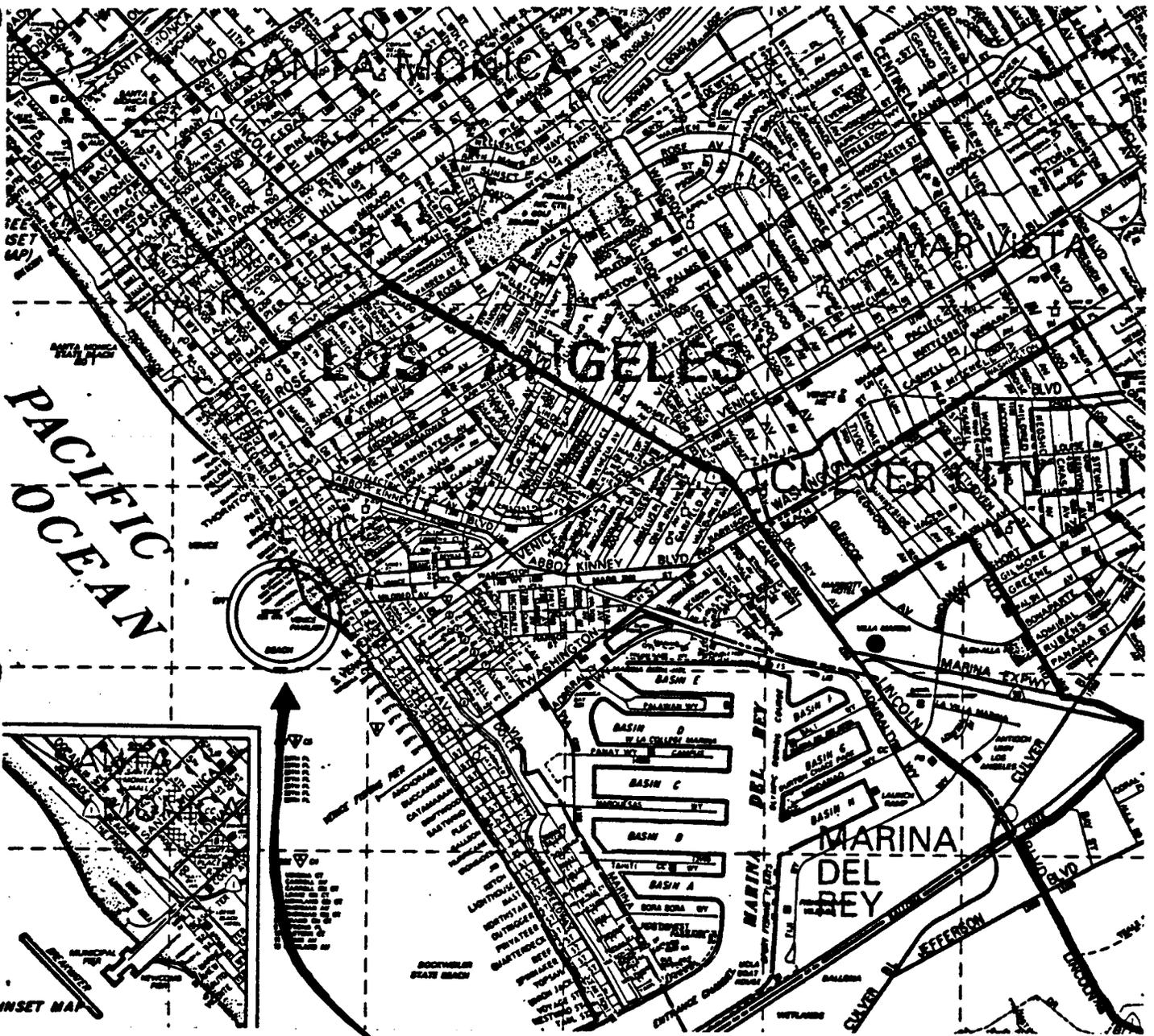
E. California Environmental Quality Act

Section 13096 of the California Code of Regulations requires Commission approval of 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)(i) of CEQA prohibits a proposed development from being approved if there

are feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse impact which the activity may have on the environment.

The proposed project has been conditioned in order to be found consistent with the Chapter 3 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 and amendment can be found consistent with the requirements of the Coastal Act to conform to CEQA.

End/cp



Site

Venice Beach

COASTAL COMMISSION
5-98-354-A1

EXHIBIT # /

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LOS ANGELES COUNTY

DEPARTMENT OF PUBLIC WORKS

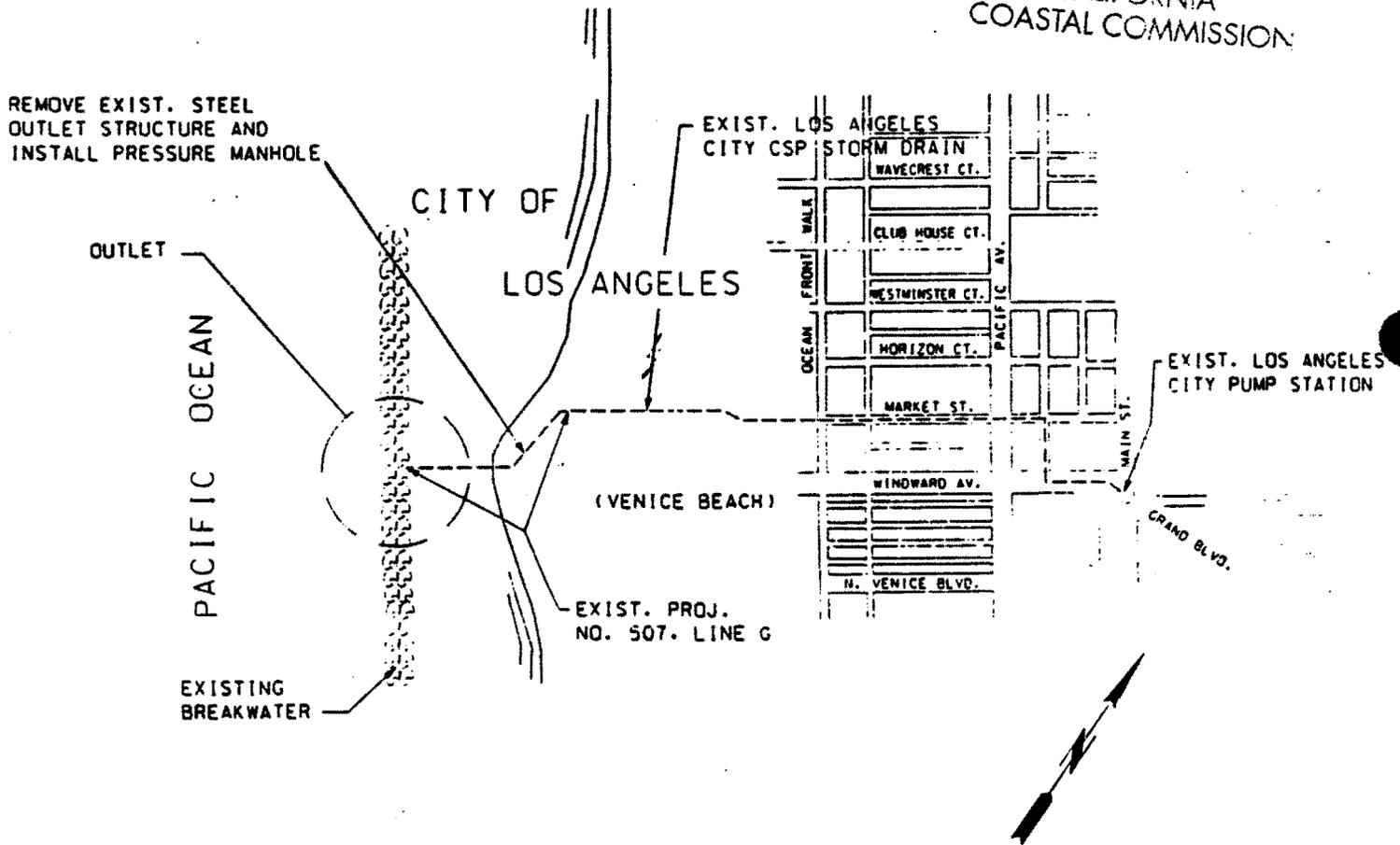
PROJECT NO. 507
LINE G

5-98-354

OCEAN OUTLET REPAIR

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CALIFORNIA
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NO SCALE

LOCATION MAP

COASTAL COMMISSION

5-98-354-A

EXHIBIT # 2

PAGE 1 OF 1

Describe Proposed Amendment

The Los Angeles County Department of Public Works currently has a permit from the Coastal Commission to modify an existing storm drain outlet on Venice Beach in the vicinity of Market Street. The approved project consists of replacing the existing outlet with a 45-degree elbow which will prevent waves from pushing sand up the pipe and plugging it. In order to accomplish this, a significant portion of the existing stone breakwater would require repositioning and supplementing with imported rock.

It has become physically impossible to modify the storm drain outlet as originally planned due to the unanticipated discovery during construction of a large mass of grouted stone at the location of the proposed modification. The discovery prompted a redesign, as shown in the attached drawings, which has resulted in a revised modification with some very beneficial advantages over the original modification. The revised modification consists of the replacement of a single 8-foot length of concrete pipe with a rectangular reinforced concrete structure only slightly wider and taller than the existing pipe. The structure will be located on the sand approximately forty feet from the existing breakwater (see attached photograph) and will house a rubber check valve which will prevent sand from entering and plugging the storm drain. The pipe remaining downstream from the structure will continue to convey storm flow beyond the existing breakwater and will be continuously flushed by the tidal action as it is now. The structure will be covered with a bolted steel plate for safety and to prevent storm flows from discharging onto the beach while providing a convenient maintenance access point which currently does not exist. This arrangement will allow our maintenance crews to safely and routinely inspect and maintain the storm drain. It will help to insure proper functioning of the drain without any significant disruption to the beach and its visitors as currently occurs several times during each storm season. We are confident that this modification will prevent the need for any temporary outlet structures similar to the steel structure currently discharging storm water onto the beach as shown in the attached photograph. The revised modification will also eliminate the need for a major alteration of the existing stone breakwater which was included in the original modification.

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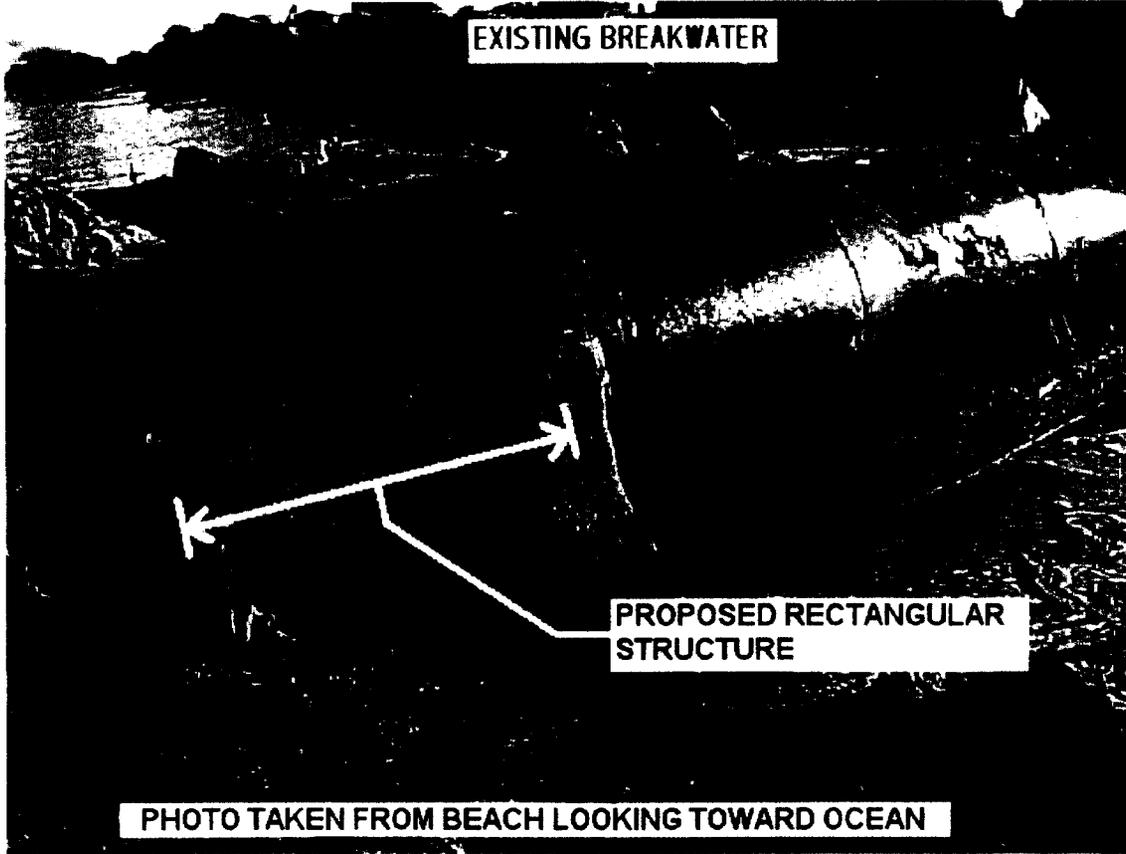
EXHIBIT # 3
PAGE 1 OF 2

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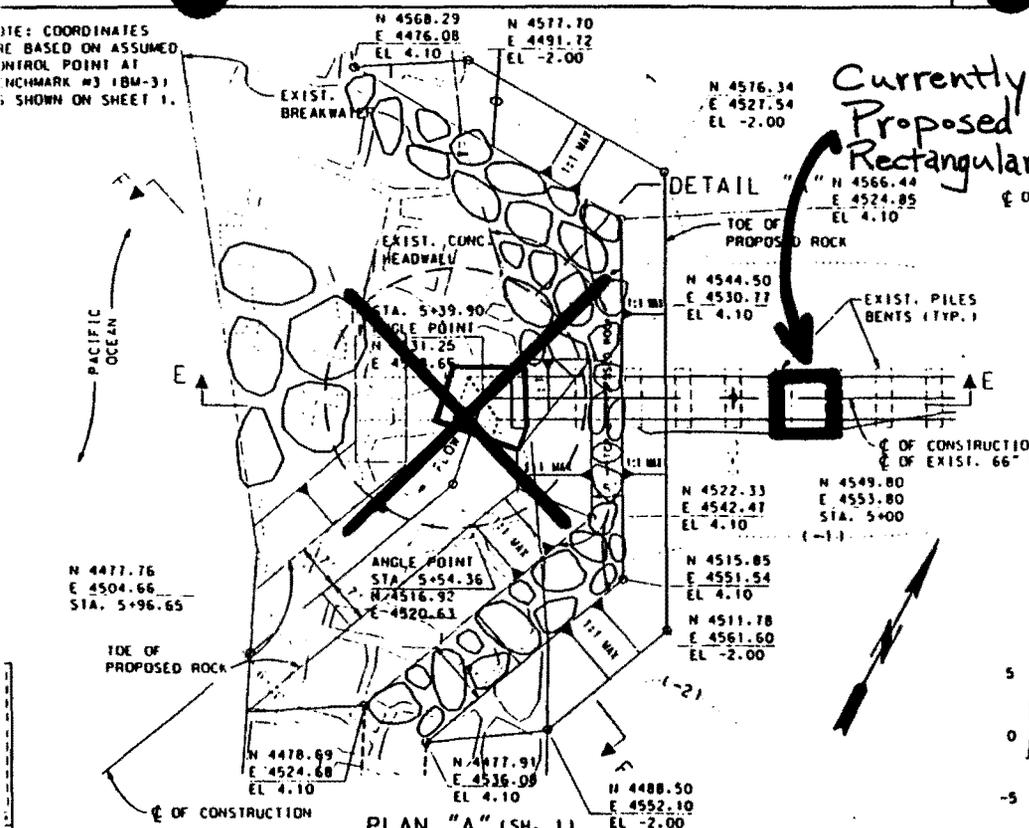


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EXHIBIT # 3

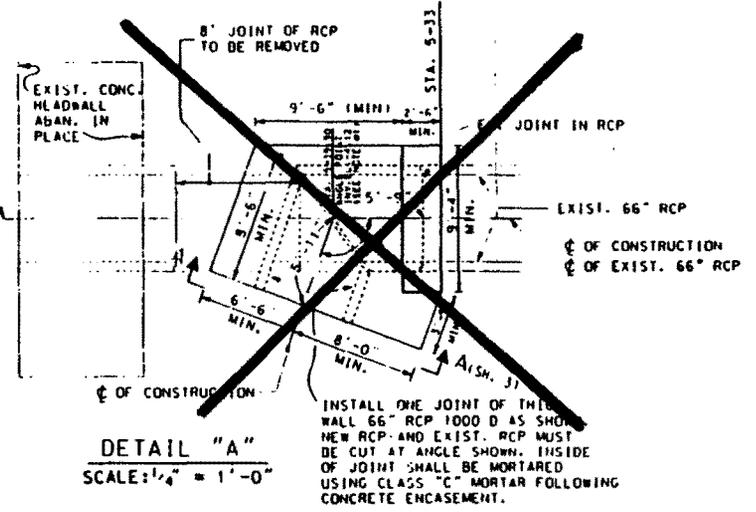
PAGE 2 OF 2

NOTE: COORDINATES ARE BASED ON ASSUMED CONTROL POINT AT BENCHMARK #3 (BM-3) SHOWN ON SHEET 1.

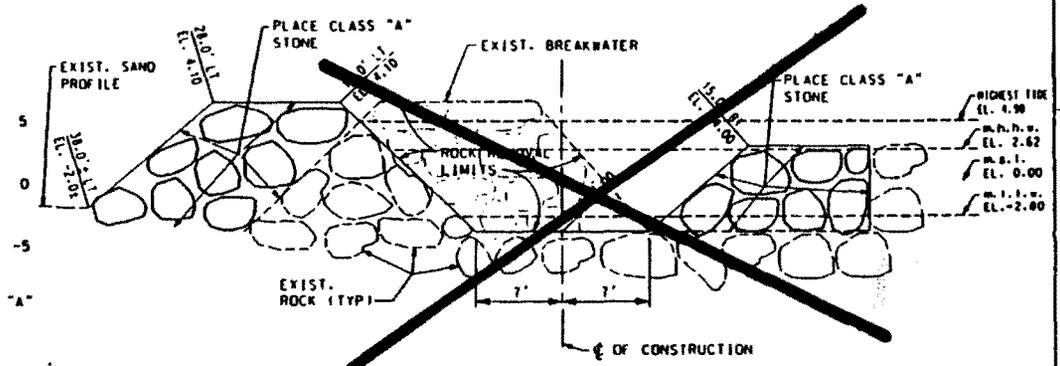


PLAN "A" (SH. 1)
SCALE: 1" = 10'

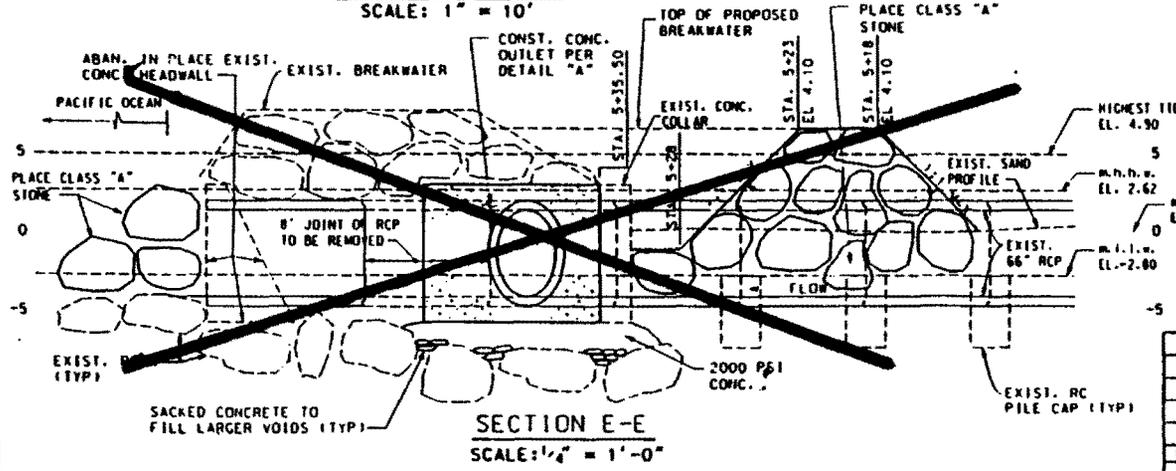
Currently Proposed Rectangular Structure



DETAIL "A"
SCALE: 1/4" = 1'-0"



SECTION F-F
SCALE: 1" = 5'



SECTION E-E
SCALE: 1/4" = 1'-0"

- NOTES:
1. CONTRACTOR SHALL VERIFY AT STA. 5+39.90 PRIOR TO NEW RCP.
 2. SEE PROJECT SPECIFICATION

NO.	DATE	REVISIONS

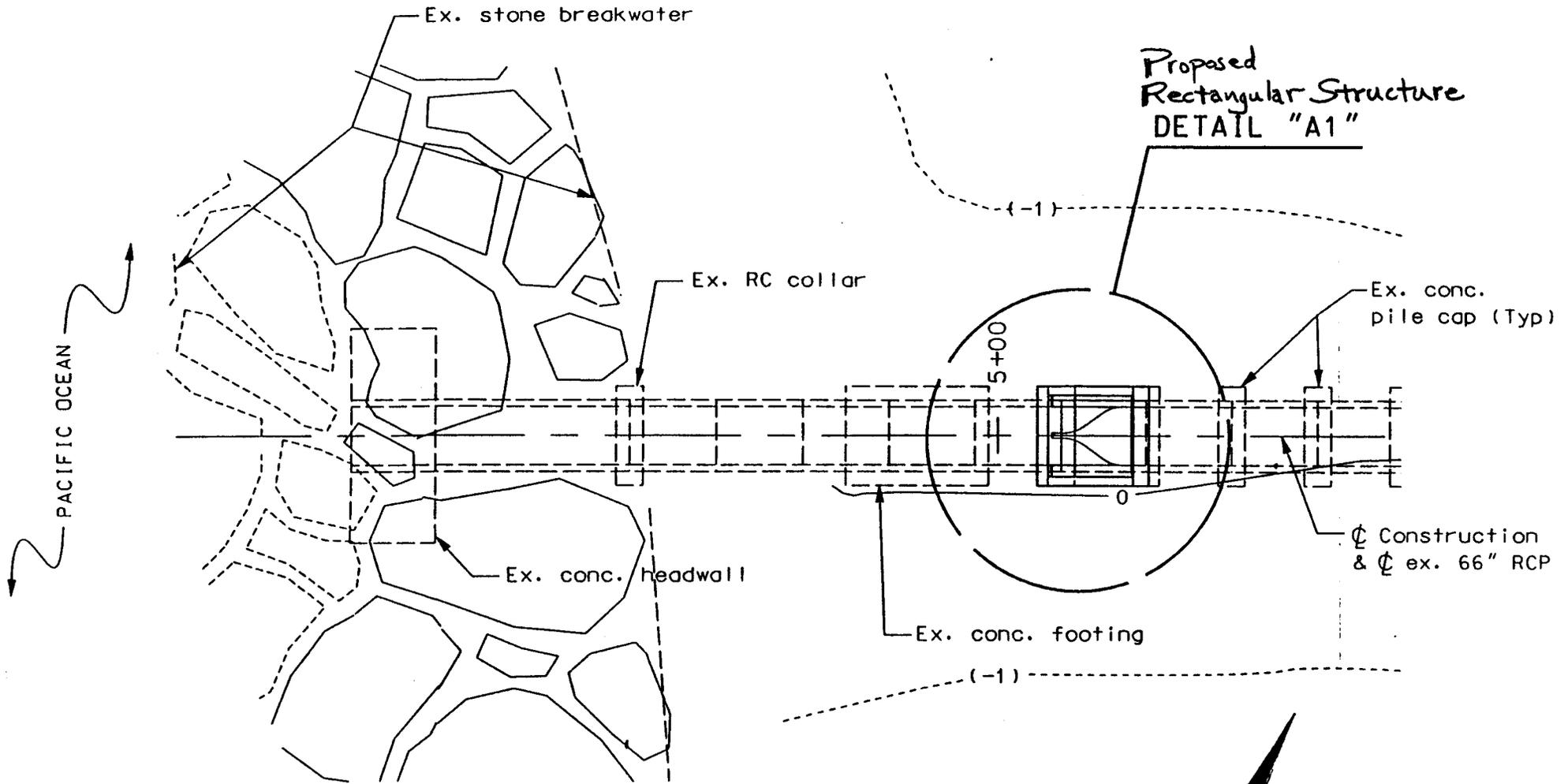


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COASTAL COMMISSION
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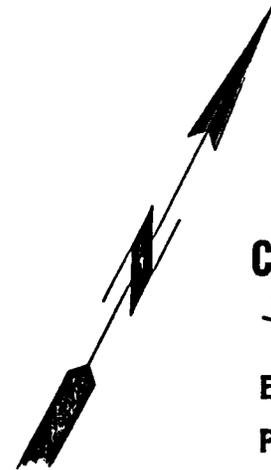
Plan approved per cdp 5-98-354 (4/13/99)
Proposed Changes in **BOLD**; Deletions = **X**

EXHIBIT # 4
PAGE 1 OF 1



PLAN "A" (SH. 1)

SCALE: 1" = 10'

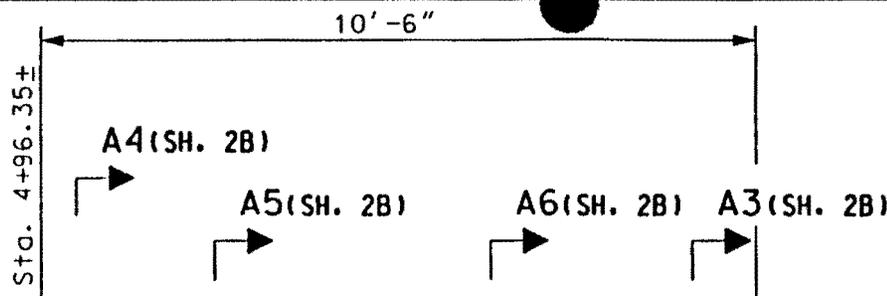


COASTAL COMMISSION

5-98-354-A1

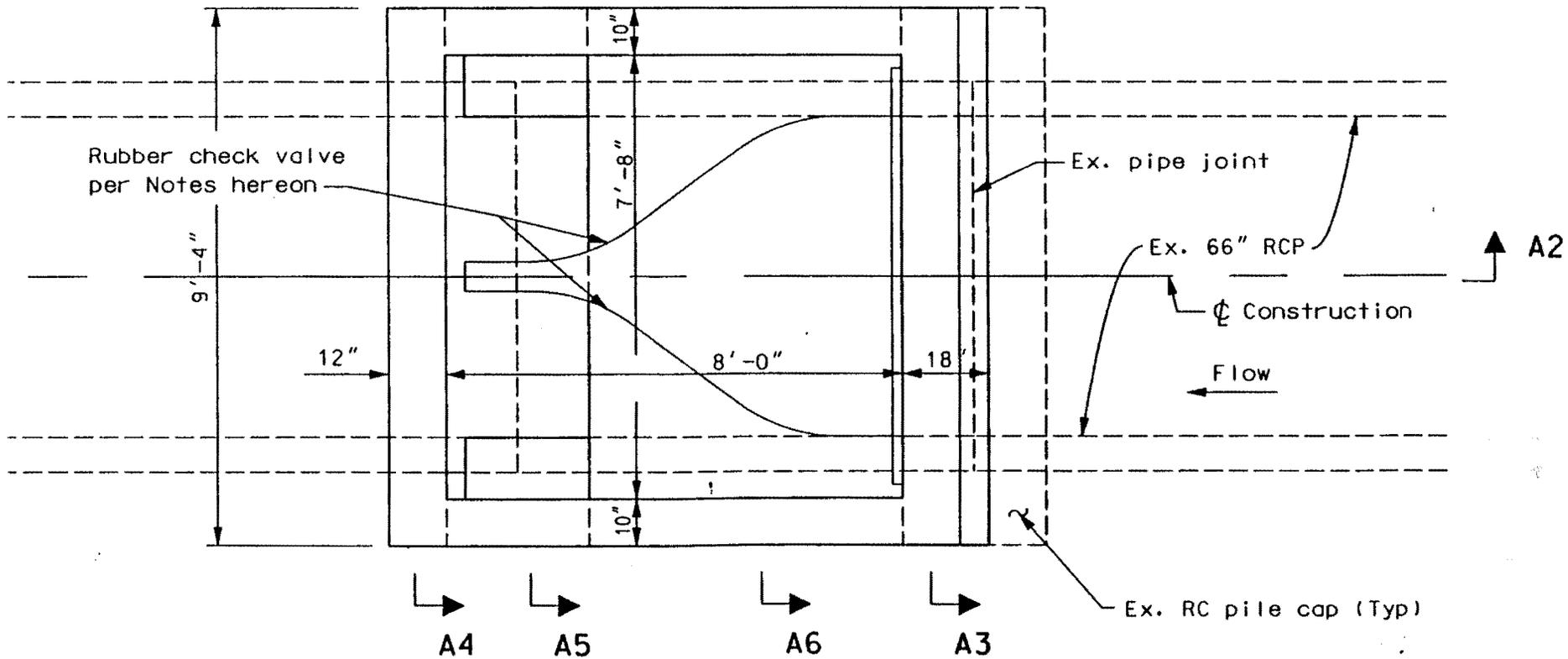
EXHIBIT # 5

PAGE 1 OF 2



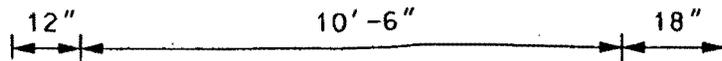
Proposed
Rectangular
Structure

"A1"



DETAIL "A1"

SCALE: 1/2" = 1'-0"



COASTAL COMMISSION
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EXHIBIT # 5

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