

CALIFORNIA COASTAL COMMISSION

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

**RECORD PACKET COPY**

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 Staff: GDC-SD
 Staff Report: January 14, 1999
 Hearing Date: February 3-5, 1999

REGULAR CALENDAR
STAFF REPORT AND PRELIMINARY RECOMMENDATION

Fr 8b

Application No.: 6-98-131

Applicant: Gary Glasgow

Agent: Steve Adams

Description: Construction of a 25 foot-high, approximately 1,355 sq. ft. first and second story addition to an existing 18 foot-high, single-story, 1,590 sq. ft. single-family residence on a 4,875 sq. ft. blufftop lot.

Lot Area	4,875 sq. ft.
Building Coverage	1,846 sq. ft. (38%)
Pavement Coverage	1,153 sq. ft. (24%)
Landscape Coverage	1,876 sq. ft. (38%)
Parking Spaces	2
Zoning	Medium Residential
Plan Designation	Medium Residential (5-7 du/ac)
Project Density	8.9 du/a
Ht abv fin grade	25 feet

Site: 215 Pacific Avenue, Solana Beach, San Diego County
 APN 263-323-01

Substantive File Documents: Certified County of San Diego Local Coastal Program (LCP); City of Solana Beach General Plan and Zoning Ordinance; DRB 17-98-18; "Geotechnical Evaluation of Coastal Bluff Property" November 23, 1998, Susan E. Tanges, CDP Nos. 6-95-23;6-95-95;6-97-125 to 127 and 6-98-144.

STAFF NOTES:Summary of Staff's Preliminary Recommendation:

Staff is recommending approval of the proposed project with special conditions which address applicant's assumption of risk, future response to development on the site and the submittal of final plans. While the proposed development will occur on a coastal bluff, the proposed residential addition will not occur any closer than 40 feet from the bluff

edge. The applicant's geotechnical engineer has determined this to be a sufficient distance from the bluff edge to assure the addition will not be subject to threat from bluff erosion within the next 75 years. As conditioned, the proposed residence can be found consistent with all applicable Chapter 3 policies of the Coastal Act.

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. Revised Final Plans. PRIOR TO THE ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicant shall submit to the Executive Director for review and written approval, final site and building plans, that have been stamped and approved by the City of Solana Beach. Said plans shall be in substantial conformance with the submitted building plans dated 11/30/98 and also include the following:

- a. There are no modifications to the existing foundations, exterior walls or accessory structures within 40 feet of the bluff edge, other than the roof deck, as depicted on the submitted floor and foundation plans dated 11/30/98; and
- b. Gutters are installed on all improvements and drainage and runoff from gutters and all impervious surfaces of the development shall be collected and directed away from the edge of the bluff towards the street.
- c. Any existing permanent irrigation system located within 40 feet of the bluff edge, shall be capped or removed and no additional landscaping, accessory structures or permanent improvements shall be located within five feet of the bluff edge.

The permittee shall undertake the development in accordance with the approved plan. Any proposed changes to the approved plan shall be reported to the Executive Director. No changes to the plan shall occur without a Coastal Commission approved amendment to this coastal development permit unless the Executive Director determines that no amendment is required.

2. Assumption of Risk: 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 hazard from bluff collapse and erosion 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 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.

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.

3. Future Response to Development. If in the future the permittee seeks a coastal development permit to construct bluff or shoreline protective devices, the permittee will be required to include in the permit application information concerning alternatives to the proposed bluff or shoreline protection. Alternatives include but are not limited to; relocation of portions of the residence that are threatened, removal of accessory structures, structural underpinning, and other remedial measures capable of protecting the residence without bluff or shoreline stabilization devices. The information concerning these alternatives must be sufficiently detailed to enable the Coastal Commission to evaluate the feasibility of each alternative, and whether each alternative is capable of protecting existing structures that are in danger from erosion.

PRIOR TO THE 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 reflect the above information. The recorded 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.

IV. Findings and Declarations.

The Commission finds and declares as follows:

1. Project Description. Proposed is the construction of an approximately 1,355 sq. ft. first and second story addition to an existing, approximately 18 foot-high, single-story, 1,590 single-family residence including a two-car garage on a 4,875 sq. ft. blufftop lot. The addition involves construction of 256 sq. ft. of laundry and storage rooms on the first floor, and a 25 foot-high, approximately 1,099 sq. ft. of second floor addition for new bedrooms, baths and an office. The applicants also propose to construct an approximately 246 sq. ft. deck on the second floor, west of the proposed second story addition. The proposed deck will be incorporated into the existing first floor roof. With the exception of the proposed deck, all proposed structural additions including any changes to the foundation will take place on the landward side of the existing residence, at least 40 feet from the edge of the bluff,. The project site is a blufftop lot located on the west side of Pacific Avenue in the City of Solana Beach. The residence is approximately 43 years old. The setback of the current residence ranges approximately 31 to 35 ft. from the edge of the bluff. No grading is proposed with this application.

Currently there is an at-grade concrete patio extending seaward of the residence to within approximately 12 feet of the bluff edge. A wooden fence is located along the western perimeter of the site approximately 2-3 feet from the bluff edge. There are no modifications proposed to these accessory structures with this application.

The site is bounded by single-family residential structures on the north, south and east and by a coastal bluff and the Pacific Ocean to the west. The coastal bluff adjacent to the site is approximately 83 feet in height with the face of the bluff and the beach below currently owned by the City of Solana Beach. The lower portions of the bluff slopes at a grade of approximately 53 degrees, and is sparsely vegetated with succulents and sea lavender. The upper 15 feet of the bluff is steeper with a gradient varying from 80 degrees to near-vertical, and vegetated with iceplant. The toe of the bluff has been undercut creating a slightly overhanging seacliff approximately 10 feet high; however, there is no indication of seacave development on the site. In addition, there are no improvements or structures on the bluff face.

The subject site was previously in the certified County of San Diego Local Coastal Program (LCP) jurisdiction. Since the incorporation of the City of Solana Beach, the certified County LCP no longer applies to the area, however, it is still utilized as a guidance document in review of coastal issues. Since the City does not have a certified LCP, the standard of review is Chapter 3 policies of the Coastal Act.

2. Blufftop Stability. Section 30253 of the 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.

The site of the proposed development is situated atop a coastal bluff area of the City of Solana Beach. Because of the natural process of continual bluff retreat, coastal bluffs in this area are considered a hazard area. A number of significant bluff failures have occurred along this stretch of coastline including several recent slides on the bluffs just north and south of the subject site that have led to emergency permit and coastal development permit requests for various forms of shoreline protection (ref. CDP Nos. 6-98-21-G/Blackburn, 6-98-25-G/Stroben, 6-98-27-G/O'Neal, 6-97-125/Las Brisas, 6-97-126/O'Neal and 6-97-127/Bennett). Clearly the potential exists for significant bluff retreat in this area. In addition, an application has recently been submitted to fill seacaves and undercuts below seven contiguous blufftop parcels along Pacific Avenue as a preventative measure to reduce erosion at the base of the bluff and reduce the potential for bluff failures in the future. The applicant's lot is one of these seven blufftop parcels (ref. CDP NO. 6-98-144/Solana Beach Coastal Preservation Association).

To find a proposed blufftop residence or addition consistent with Section 30253, the Commission must find that it will be stable through-out its useful life and that it will not require a seawall or other shoreline protective device through-out its useful life. To make these findings for blufftop residences and additions in Solana Beach and Encinitas, the Commission has had to require that such development be setback a "safe" distance from the bluff edge. In recent permit actions, the Commission required that new development observe a minimum setback of 40 feet from the top of the bluff. Prior to that requirement, the Commission had approved blufftop development with a setback of either 40 feet, or 25 feet if a certified engineering geologist determined that bluff retreat would not threaten the principal permitted structure within its economic life (75 years). When the County of San Diego had jurisdiction over the area, the County adopted the Coastal Development Area regulations as part of their LCP Implementing Ordinances, which had similar requirements. The City of Solana Beach has also utilized a 40 foot setback which may be reduced to 25 feet following a discretionary review process which finds that the construction will not be subject to foundation failure during the economic life of the structure. However, recently the Commission began requiring a 40-foot setback regardless of whether an applicant had a geologist statement of safety at 25 feet because it found in a number of cases that slope failures occurred and threatened homes in areas where geologists had determined that the homes would be safe from erosion. The slope failures demonstrate the unpredictability of bluff stability in this area. The Commission found that it could not find a proposed residence on the bluff in Solana Beach or Encinitas consistent with Coastal Act section 30253 unless the residence was set back at least 40 feet from the bluff edge.

In addition, in some cases, applicants proposing residences or additions closer than 40 feet to the edge of the bluff have agreed to remove portions of the residence or the entire residence should it become threatened in the future as a condition of approval of a permit for the residence or addition (ref. CDP Nos. 6-90-142/Lansing, 6-91-81/Bannasch, 6-91-129/Silveri, 6-93-181/Steinberg, 6-93-20A/Cramer, 6-95-23/Bennett and 6-95-95/O'Neal). This concept, known as "planned retreat", requires the line of development to recede commensurate with bluff retreat. This concept offers the homeowner reasonable use of their property in a hazardous area for a limited period of time, i.e., until the hazardous nature of bluff retreat threatens the residence. However, in the case of the

proposed development, all structural improvements, including foundation footings for the second floor, will occur landward of the 40-foot setback line and will, therefore, be consistent with Commission precedent.

However, even though the addition is proposed to be setback at least 40 feet from the edge of the bluff, it may increase the likelihood that the existing residence will require shoreline protection in the future by prolonging the economic life of the existing residence. In response to these concerns, the applicant has submitted a geologic reconnaissance pertaining to bluff stability on the project site. The existing residence is approximately 43 years old. The report states that bluff retreat over the life of the residence, estimated at a maximum of 6.5 feet over the next 75 years, would not threaten the proposed additions and may not threaten any portion of the existing residence seaward of the 40-foot setback area, although some rear-yard accessory structures such as the concrete patio and fence may become undermined. In addition, the report states that it appears that a coastal bluff protective device will not be warranted to safeguard the existing residence and proposed addition from the coastal bluff retreat anticipated to occur during the next 75 years.

While the geotechnical report submitted with this application indicates that a coastal bluff protective device would not be warranted, an application for fill of an approximately 10 foot-high undercut below the subject development has recently been submitted (ref. CDP#6-98-144/ Solana Beach Coastal Preservation Association). While the Commission has not yet acted on that application, the Commission is concerned with the apparent contradiction between the subject development's geotechnical report (which professes that a protective shoreline structure is not warranted) and the new application for the fill the undercut. The stated purpose for the fill of the undercut is generally preventative to "minimize risk to the beach-going public and to protect against sea cliff collapses and the subsequent loss of support and progressive upper-bluff failures. . ." (Letter from applicant's geologist, Walt Crampton dated December 14, 1998). However, the letter indicates that there is no immediate threat to bluff-top residences with the possible of exception of two properties, neither of which is the subject site. In addition, the slope stability analysis submitted with the geotechnical report for the subject development identifies several potential failure surfaces for the subject property. Their analysis indicates that even under the worse case scenario, the existing home and the proposed additions are not identified as threatened within the next 75 years. While the Commission will determine, under a separate permit application, the need to fill the undercut, no information has been identified in either geotechnical survey which would preclude the Commission's approval of the subject residential additions landward of the 40-foot setback area.

The applicant's representative has also indicated that the design of the proposed addition will not preclude the possibility of removal and relocation of the existing residence or proposed additions should they be threatened in the future. The proposed additions, however, will not be structurally independent of the existing residence. No changes to the existing foundation are being made within the 40-foot geologic setback area, and the proposed addition observes the 40 ft. geologic setback which is required for new development today. As such, while nothing in this approval requires the applicant to remove or relocate portions of the existing residence or the proposed additions in the future, the Commission is assured that approval of the proposed addition will not preclude such an option in the future as a feasible alternative.

However, in order to minimize the impacts of development on bluff stability, the Commission must be assured that inappropriate structures or improvements are not constructed within the 40 geologic setback area. Therefore, Special Condition #1 has been proposed to ensure that the applicants understand that no work in the setback area is permitted. This condition requires the submittal of final plans, approved by the City of Solana Beach, confirming that no improvements to the existing foundation, exterior walls or accessory structures will take place within 40 feet of the bluff edge. Such improvements, which could extend the economic life of the existing residence, are not appropriate within the geologic setback area.

As stated previously, Section 30253 of the Act requires that new development not "contribute significantly to erosion, geologic instability. . .". The submitted geotechnical report indicates that although blufftop runoff appears to drain toward the street, it recommended additional measures be implemented to lessen erosion to the bluff. In addition, photographs submitted with the report show rilling and gullying on the bluff face. Therefore, Special Condition #1 requires that the final plans indicate the installation of gutters to all improvements and that drainage from them and all impervious surfaces be appropriately collected and directed away from the bluff, towards the street. The condition also requires that the plans demonstrate the removal or absence of any permanent irrigation systems which may be in place within 40 feet of the bluff edge or on the bluff face. Only at grade, expendable improvements are permitted within the geologic setback area. However, as previously noted, no such additional structures are proposed with this application.

In addition, due to the inherent risk of blufftop development and the Commission's mandate to minimize risk, Special Condition #2 requires the applicant to waive liability and indemnify the Commission against damages that may occur in the future due to bluff failure or erosion. Although the Commission has sought to minimize such risks, the risks cannot be eliminated entirely. The applicant's geotechnical report has identified the site as unlikely to fail within the lifetime of the proposed additions, but has also emphasized the difficulty of predicting the erosion rate of the bluffs due to unpredictable storms or geologic disturbances. Given that the applicants have chosen to construct the additions despite these risks, the applicants must assume these risks. Accordingly, Special Condition #2 requires the applicant to record a deed restriction that evidences their acknowledgement of the risks and that indemnifies the Commission against all claims for damages that may be brought against the Commission as a result of its approval of this permit.

As the subject property is located in an area known to be subject to geological instability, Special Condition #3 has been proposed. This condition requires the applicant to record a deed restriction that places the applicant and their successors in interest on notice of the information that would be required to accompany an application for shoreline protection in the future. Section 30253 of the Coastal Act mandates that all new development must minimize, not create, geologic hazards. Section 30250 mandates that new development shall be sited so as not to individually or cumulatively adversely affect coastal resources. Moreover, pursuant to Section 21080.4 of CEQA and Section 13096(a) of the Commission's implementing regulations, the Commission must assess alternatives if additional protective devices are found to be consistent with Section 30235 and any other applicable Chapter 3 policies. For these reasons, the Commission requires that applications

for shoreline protection include detailed information on alternatives. The intent of this condition is to ensure that the applicant and any future owners of the property are aware of these information filing requirements for any future proposals for shore or bluff protection

In summary, the proposed development involves an addition to an existing residence to be located more than 40 feet from the bluff edge, with no changes proposed to the existing foundation within the geologic setback area. As such, the addition will not involve any further seaward encroachment of the residence, and will not require shoreline protective devices within the economic life of the structure. Given the above cited special conditions, the impact of the proposed project on the overall integrity of the bluff has been minimized to the maximum extent feasible. Therefore, the Commission finds the subject development, as conditioned, consistent with Section 30253 of the Coastal Act.

3. Public Access. Section 30604 (c) of the Coastal Act states:

(c) Every coastal development permit issued for any development between the nearest public road and the sea or the shoreline of any body of water located within the coastal zone shall include a specific finding that such development is in conformity with the public access and public recreation policies of Chapter 3 (commencing with Section 30200).

The subject site is located between the Pacific Ocean and the first public roadway, which in this case is Pacific Avenue. The project site is located within a developed single-family residential neighborhood. Adequate public vertical access is provided approximately one block south of the subject site at the City of Solana Beach's Fletcher Cove/Solana Beach Park, as well as approximately three blocks north of the site at the City's Tide Park public access stairway. Vertical access through the site is not necessary nor warranted, given the fragile nature of the bluffs. The proposed project will have no direct impact on public access, consistent with the public access policies of the Coastal Act.

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

The subject site was previously in the County of San Diego Local Coastal Program (LCP) jurisdiction, but is now within the boundaries of the City of Solana Beach. The City will, in all likelihood, prepare and submit for the Commission's review a new or revised LCP for the area.

Because of the incorporation of the City, the certified County of San Diego Local Coastal Program no longer applies to the area. However, the issues regarding protection of coastal resources in the area have been addressed by the Commission in its review of the San Diego County LUP and Implementing Ordinances. As such, the Commission will continue to utilize the San Diego County LCP documents for guidance in its review of development proposals in the City of Solana Beach until such time as the California Coastal Commission certifies an LCP for the City.

In the case of blufftop development, those properties located on the bluffs were subject to deferred certification due to differences between the Commission and the County concerning potential reductions in the bluff setback. The proposed residential construction, as conditioned, is consistent with the most restrictive interpretation of the policies of the CD Overlay regulations of the County and the Commission's recommended bluff setbacks.

In preparation of an LCP, the City of Solana Beach is faced with many of the same issues as the City of Encinitas, located immediately north of Solana Beach, whose LCP was certified by the Commission in March 1995. The City of Encinitas' LCP includes the intent to prepare a comprehensive plan to address the coastal bluff recession and shoreline erosion problems in the City. The plan will include at a minimum, bluff top setback requirements for new development and redevelopment; alternatives to shore/bluff protection such as beach sand replenishment, removal of threatened portions of a residence or the entire residence or underpinning existing structures; addressing bluff stability and the need for protective measures over the entire bluff (lower, mid and upper); impacts of shoreline structures on beach and sand area as well as mitigation for such impacts; impacts for groundwater and irrigation on bluff stability and visual impacts of necessary/required protective structures.

The City of Solana Beach should also address these items in the context of a comprehensive approach to management of shoreline resources. As shoreline erosion along the coast rarely affects just one individual property, it is imperative that a regional wide solution to the shoreline erosion problem be addressed and solutions developed to protect the beaches. Combined with the decrease of sandy supply from coastal rivers and creeks and armoring of the coast, beaches will continue to erode without being replenished. This will, in turn, decrease the public's ability to access and recreate on the shoreline.

The project site was previously designated for medium density single-family residential development under the County LCP and in the City of Solana Beach Zoning Ordinance and General Plan. The proposed development will not result in a higher density of development for the site.

In addition, the proposed residence, as conditioned, is consistent with all applicable policies of the County LCP. The Commission therefore finds the proposed development, as conditioned, conforms to Coastal Act Chapter 3 policies. Therefore, as conditioned, the subject development will not prejudice the ability of the City of Solana Beach to complete a certifiable local coastal program.

5. 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 conditioned in order to be found consistent with the future development, public access, and geologic stability policies of the Coastal Act. Mitigation measures, including recordation of deed restrictions addressing future development and submittal of final project plans will minimize all adverse environmental impacts. As conditioned, there are no feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse impact which the activity may have on the environment. Therefore, the Commission finds that the proposed project, as conditioned to mitigate the identified impacts, 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.

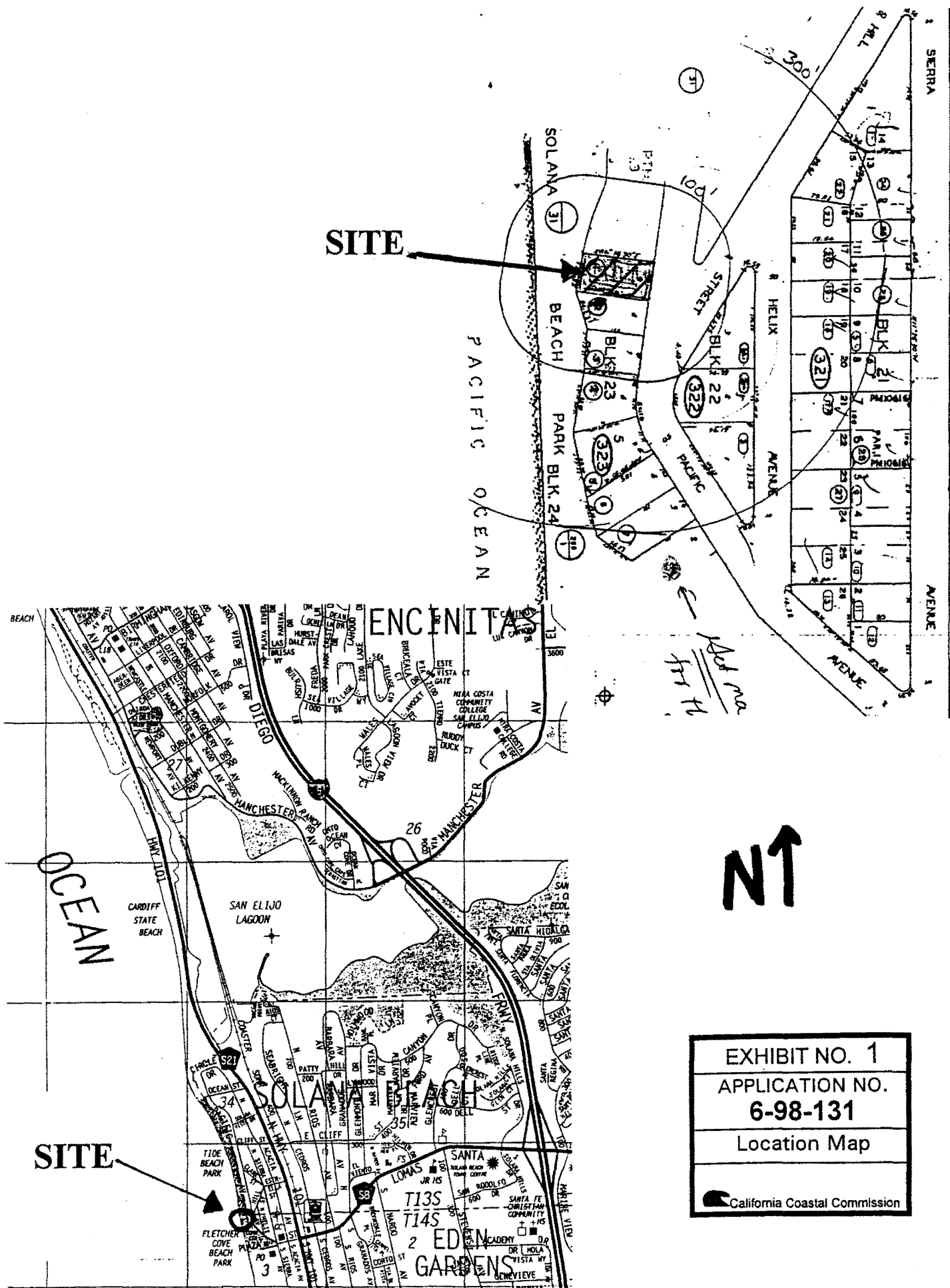
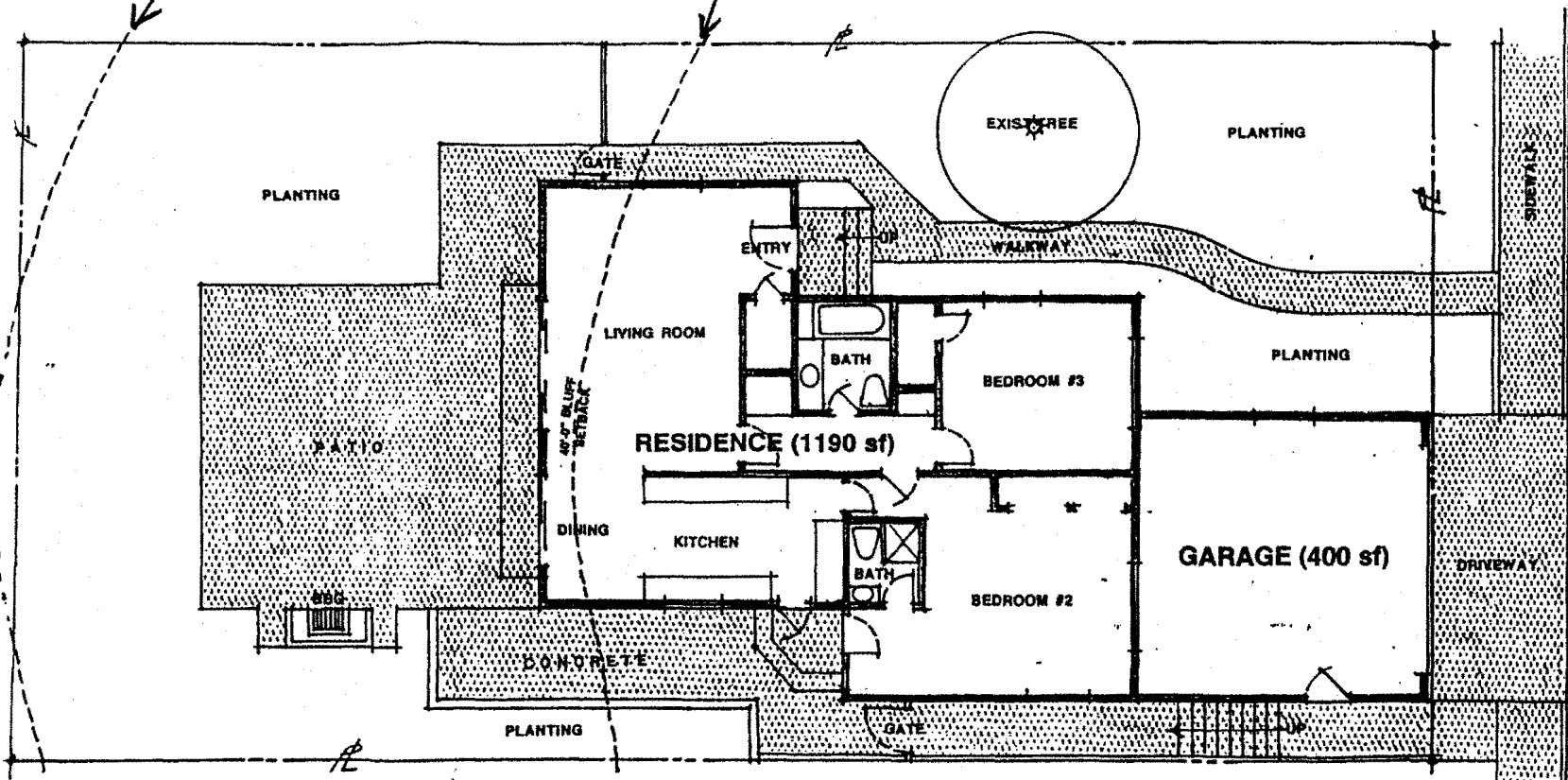


EXHIBIT NO. 1
APPLICATION NO. 6-98-131
Location Map
California Coastal Commission

Edge of Bluff

40 ft. Setback



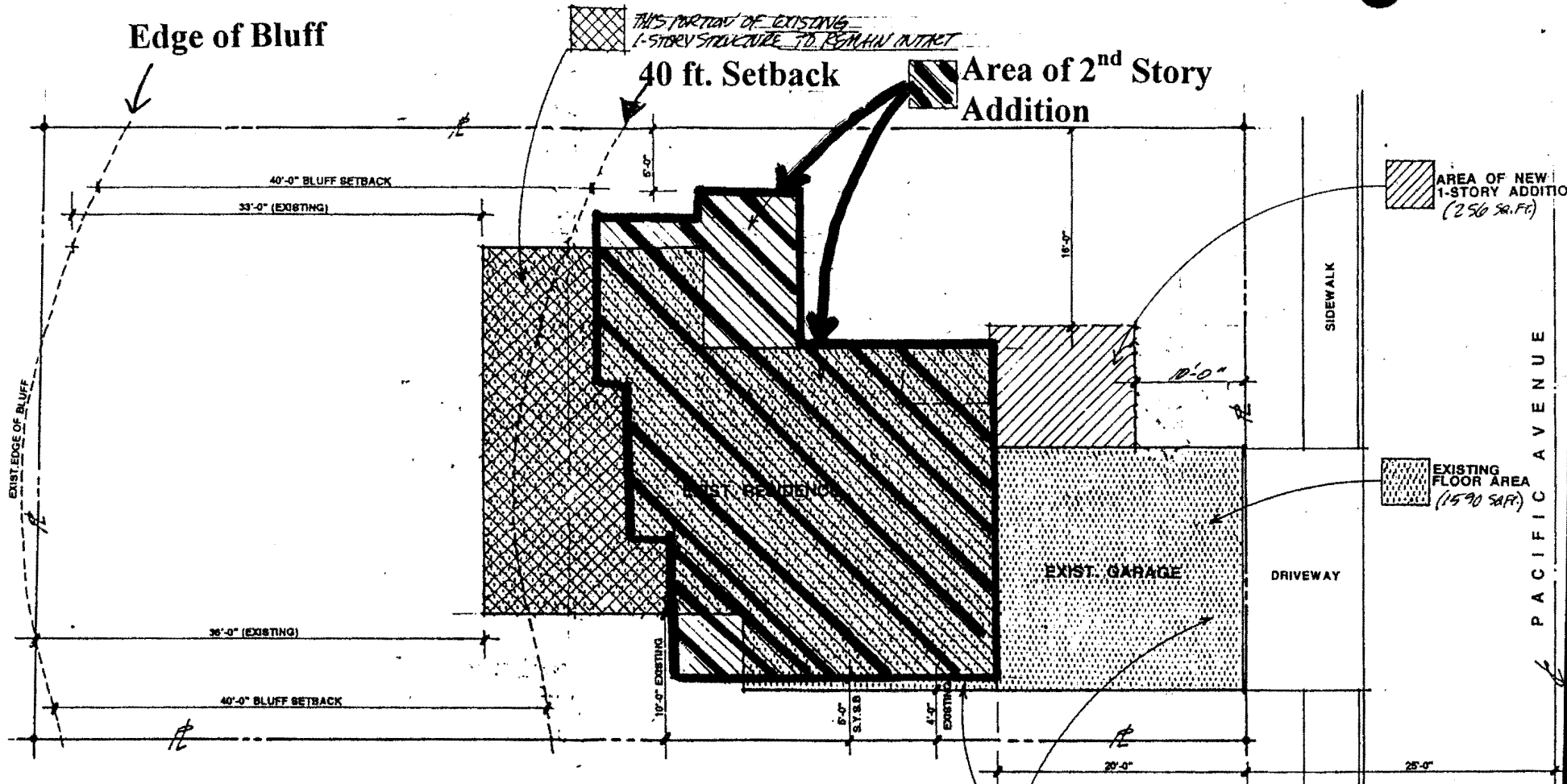
EXISTING CONDITIONS PLAN SCALE: 1/8" = 1'-0"



California Coastal Commission
 Existing Site Plan
 APPLICATION NO. 6-98-131
 EXHIBIT NO. 2

THIS PORTION OF EXISTING 1-STORY STRUCTURE TO REMAIN INTACT
 AREA 2-STORY (10)

Edge of Bluff



THIS PORTION OF EXISTING 1-STORY STRUCTURE TO REMAIN INTACT

40 ft. Setback

Area of 2nd Story Addition

AREA OF NEW 1-STORY ADDITION (256 SQ. FT.)

EXISTING FLOOR AREA (1590 SQ. FT.)

EXIST. RESIDENT

EXIST. GARAGE

DRIVEWAY


SIDEWALK

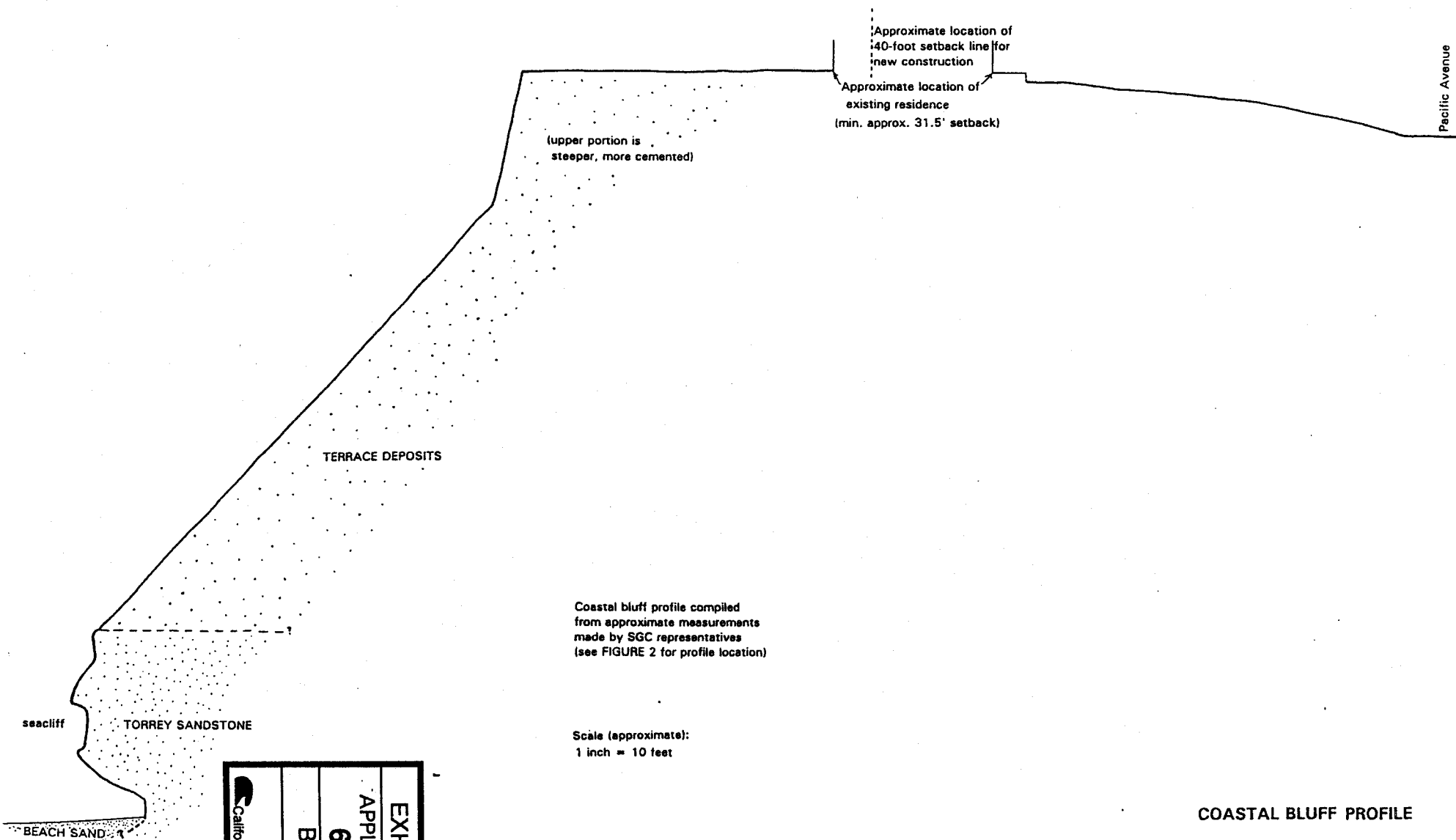
PACIFIC AVENUE

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

Note: Section 17.16.060 of Zoning Code allows for additions and remodeling to existing non-conforming structures, provided that they "do not increase the size or degree of non-conformity".



 California Coastal Commission	EXHIBIT NO. 3
	APPLICATION NO.
	6-98-131
	Proposed Site Plan



 California Coastal Commission	EXHIBIT NO. 4
	APPLICATION NO.
	6-98-131

Bluff Profile



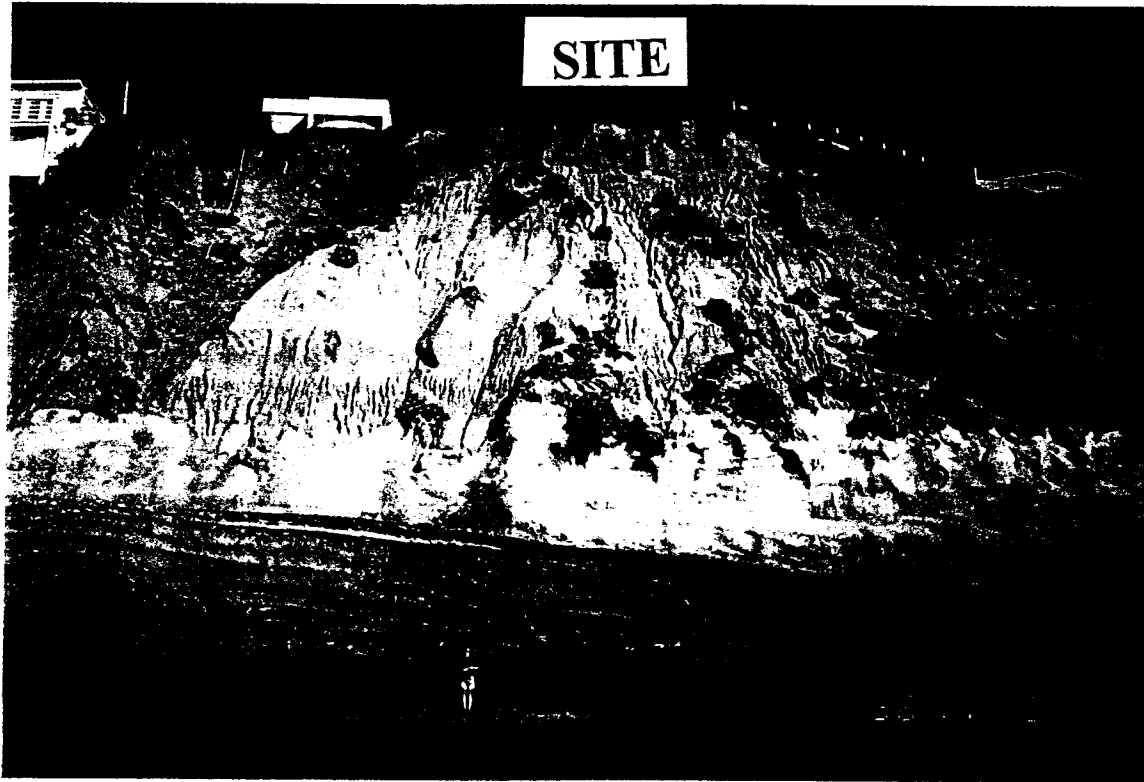
COASTAL BLUFF PROFILE

215 Pacific Avenue, Solana Beach

Project No. 167E78

FIGURE 3

SGC



PHOTOS 3 and 4
Coastal bluff at
215 Pacific Avenue
Solana Beach (3 Nov 98)

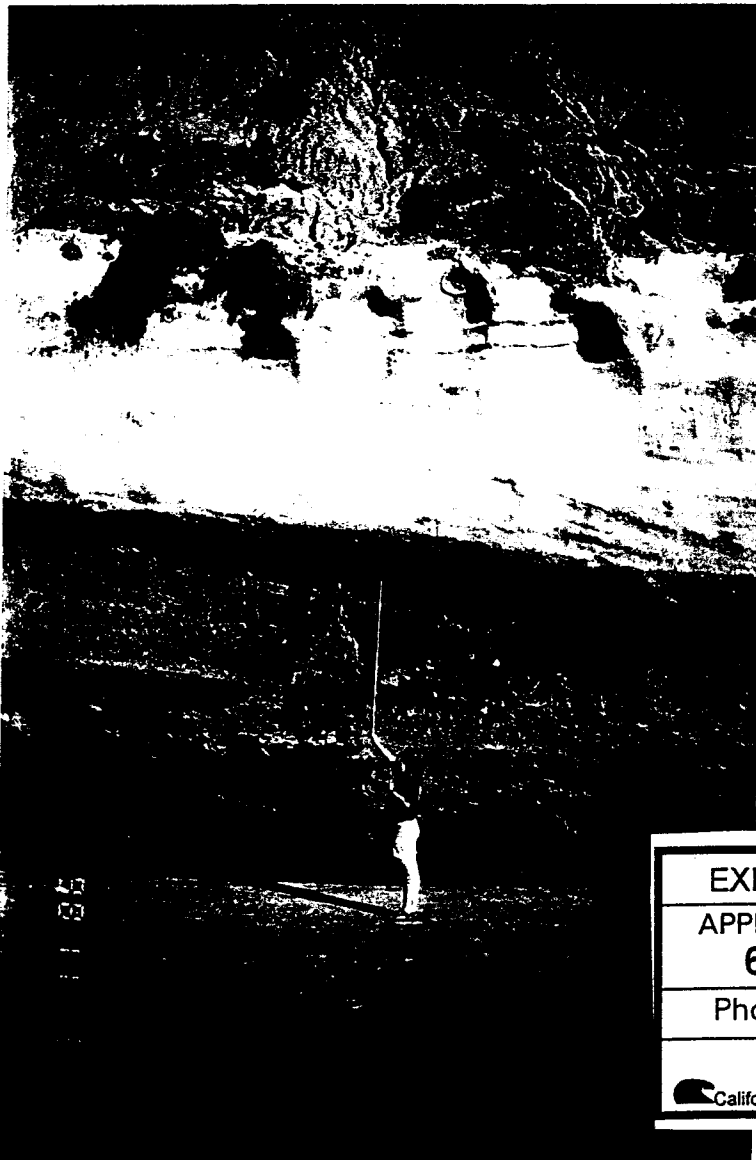



EXHIBIT NO. 5
APPLICATION NO. 6-98-131
Photos of Bluff
 California Coastal Commission

