

CALIFORNIA COASTAL COMMISSION

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 Staff Report: January 14, 1999
 Hearing Date: February 2-5, 1999

REGULAR CALENDAR
STAFF REPORT AND PRELIMINARY RECOMMENDATION

Application No.: 6-98-144

Applicant: William Redd, Jack Morrison, Nancy O'Neal, Gary Glasgow, Ann Baker, Janet Davidi, Gary Garber (Coastal Preservation Association)

Agent: Walt Crampton

Description: Filling of an approximately 400-foot long stretch of seacaves/undercut area at the base of a coastal bluff on public beach below seven single-family residences with a colored and textured erodible concrete mixture. Fill would be a maximum of 19 feet high, a maximum 17 feet deep, with an average height of approximately 12 feet.

Site: Public beach and bluff face below 201, 205, 211, 215, 219, 225, 231 Pacific Avenue, Solana Beach, San Diego County. APN 263-323-04, -03, -02, -01; 263-312-16, -15, -14.

STAFF NOTES:

Summary of Staff's Preliminary Recommendation:

Staff is recommending denial of the proposed shoreline protective device. There are no existing primary structures in danger from erosion; therefore, the Commission is not required to approve shoreline protection under Section 30235 of the Coastal Act. The project is proposed as preventative measure to stop collapses of the overhanging area to address a safety hazard to the public, and to stabilize the bluff area, which, if erosion continues, will eventually result in existing bluff-top structures being in jeopardy. However, the project would result in significant adverse impacts to coastal resources including visual quality, shoreline sand supply, public access, and recreation. There are a variety of less-environmentally damaging feasible alternatives available to address the applicant's concerns including signage and public education measures to reduce the risk to the public, and beach nourishment efforts and other measures that can be undertaken on the blufftop properties themselves and not on the public beach that include, underpinning of residences, removal or relocation of portions of the existing structures,

and groundwater, planting and irrigation management measures to reduce the future risks to the bluff-top structures.

Substantive File Documents: City of Solana Beach General Plan and Zoning Ordinance; certified County of San Diego Local Coastal Program; Group Delta Consultants, Inc. (GDC) "Shoreline Erosion Study North Solana Beach," 8/20/98; GDC, "Response to Review Comments Contiguous Sea Cave and Notch Infill," 12/14/98; Southland Geotechnical Consultants "Geotechnical Evaluation of Coastal Bluff Property for Proposed Residential Addition," 11/23/98.

PRELIMINARY STAFF RECOMMENDATION:

The staff recommends the Commission adopt the following resolution:

I. Denial.

The Commission hereby denies a permit for the proposed development on the grounds that the development will not be in conformity with the provisions of Chapter 3 of the California Coastal Act of 1976 and would 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.

IV. Findings and Declarations.

The Commission finds and declares as follows:

1. Detailed Project Description/History. The proposed project involves filling of a 400-foot long undercut/seacave area at the base of an 80-foot high coastal bluff below seven single-family residences in the City of Solana Beach. The fill would be as high as 19 feet and as deep as 17 feet, with an average height of approximately 12 feet. The average depth of the fill would be approximately 6 feet. The filled area would begin approximately 300 feet north of Fletcher Cove. All of the bluffs and beach at the project site are in public ownership, with the exception of the bluff face below 231 Pacific Avenue, which is owned by the bluff-top property owner.

The proposed fill would consist of a colored and textured erodible mixture designed to match the natural appearance of the surrounding bluffs and to erode at the same rate as the bluffs. Access to the site would be from the Fletcher Cove access ramp. The applicants are proposing to use a portion of the Fletcher Cove beach parking lot for staging and storage.

The Commission has a permit history on several of the bluff-top structures above the project site. At 201 Pacific Avenue, the Commission approved an expansion and remodel of the residence in February 1982 (#6-81-306). In November 1984, the Commission

approved filling a seacave in the bluff below the residence (#6-84-550). The most recent permit approved on the site involved construction of a second story addition on the landward side of the residence (#6-94-32/Redd).

At 211 Pacific Avenue, in September 1995 the Commission approved construction of an addition including a new third level to the existing two-level single-family residence (#6-95-95/O'Neal).

At 215 Pacific Avenue, the Commission is currently reviewing an application for a 1,355 sq.ft. first and second story addition to the existing residence (#6-98-131/Glasgow).

For 219 Pacific Avenue, the Commission approved a permit in February 1984, for demolition of the existing single-family residence on the bluff top, and construction of a new residence (#6-84-62/Baker). Other permits include the approval in December 1997 of the temporary placement and removal of riprap boulders along the base of the bluff (#6-97-149/Baker). A non-material amendment to allow the riprap to remain on the site until May 15, 1998 was approved by the Executive Director in April 1998, and in May 1998, the Commission approved a second amendment allowing the riprap to remain until June 15, 1998. All of the riprap has been removed from the site at this time.

At 231 Pacific Avenue, the residential site on the bluff-top has a considerable permit history beginning in March, 1983, when the Commission approved demolition of an existing bungalow and construction of a wooden deck, windscreen and railing extending 2 to 4 feet over the bluff edge (#6-83-22/Clemens). In February 1988, the Commission approved construction of first and second story additions and remodeling of the existing residence on the site (#6-88-6/Victor). In May, 1992, the Commission approved filling of two seacaves in the bluffs below the residence (#6-92-82/Victor). In January 1998, the Commission approved of the temporary placement and removal of riprap boulders along the base of the bluff (#6-98-2/Garber). However, the riprap was never placed.

The City of Solana Beach does not yet have a certified LCP, and the project site is located in an area of the Commission's original jurisdiction. Therefore, the Chapter 3 policies of the Coastal Act are the standard of review.

2. Consistency with Chapter 3 of the Coastal Act:

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

Public Access/Recreation. Pursuant to Section 30604 (c), the Coastal Act emphasizes the need to protect public recreational opportunities and to provide public access to and along the coast. Section 30210 of the Coastal Act is applicable to the proposed development and 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.

In addition, Section 30212 of the Act is applicable and states, in part:

- (a) Public access from the nearest public roadway to the shoreline and along the coast shall be provided in new development projects except where:
 - (1) it is inconsistent with public safety, military security needs, or the protection of fragile coastal resources,
 - (2) adequate access exists nearby....

Additionally, Section 30220 of the Coastal Act provides:

Coastal areas suited for water-oriented recreational activities that cannot readily be provided at inland water areas shall be protected for such uses.

Visual Resources/Alteration of Natural Landforms. Section 30251 of the Coastal Act 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.

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 connection with construction of new development. A shoreline protective device proposed in those situations is likely to be inconsistent with various other 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 that would substantially alter natural landforms along bluffs and cliffs.

The proposed development is located at the base of a coastal bluff in the City of Solana Beach. Continual bluff retreat and the formation and collapse of sea caves have been documented in northern San Diego County, including the Cities of Solana Beach and Encinitas. Bluffs in this area are subject to a variety of erosive forces and conditions (e.g., wave action, reduction in beach sand, seacave development). As a result of these erosive forces, the bluffs and blufftop lots in the Solana Beach and Encinitas area are considered a hazard area. Documentation has been presented in past Commission actions concerning the unstable nature of the bluffs in these communities and nearby communities (ref. CDP Nos. 6-93-181/Steinberg, 6-92-212/Wood, 6-92-82/Victor, 6-89-297-G/Englekirk, 6-89-136-G/Adams, and 6-85-396/Swift). In addition, a number of significant bluff failures have occurred along the northern Solana Beach/Encinitas coastline which have led to emergency permit requests for shoreline protection (ref. CDP Nos. 6-98-134-G/Presnell, et.al., 6-93-181/Steinberg, 6-93-131/Richards et. al., 6-93-36-G/Clayton, 6-93-024-G/Wood, 6-92-212/Wood, 6-92-167-G/Mallen et. al., 6-92-73-G/Robinson, and 6-91-312-G/Bradley).

The proposed project involves filling a 400-foot long undercut/seacave area at the base of the bluffs. The fill would be as high as 19 feet and as deep as 17 feet, although the average depth of the fill area is approximately 6 feet. The average height of the fill would be approximately 12 feet. The fill would consist of an erodible mixture designed to erode at the same rate as the surrounding bluffs.

Of the seven residences above the project site on the bluff-top, one is currently as close as 8 feet from the bluff edge (211 Pacific Avenue), one is at least 32 feet from the bluff edge (215 Pacific Avenue), and the remaining structures are between 18 and 22 feet from the edge of the bluff.

As characterized by the geotechnical report, the project is proposed as a preventative measure to preserve "the integrity and visual aesthetics of a 60-foot section of sloping coastal bluff and to mitigate a significant and ongoing public hazard to the beach-going public." The geotechnical report submitted with the application does not demonstrate that the existing seven bluff-top structures are not in danger from erosion. The report notes, however, that there are significant overhangs at the base of the bluff which will eventually collapse, undermining the upper bluff and triggering progressive bluff-top

failures. The report also states that the overhangs within the lower sea cliff, are "highly unstable at this time and subject to failure in the near future if exposed to any more cobble abrasion at the base of the sea cliff." The proposed project would reduce this instability. The report notes that since the conclusion of last winter's El Niño storms, numerous collapses of the overhanging areas have occurred, depositing hundred to thousands of pounds of bedrock materials onto the beach. There is currently very little sand on the beach, and the bluffs receive near constant wave action.

Because the residences are not in danger from erosion at this time, the Commission is not required to approved shoreline protection under Section 30235 of the Coastal Act. However, in numerous past actions, the Commission has found that the filling of seacaves as a preemptive measure, even if not required to protect existing primary structures, can have fewer impacts upon coastal resources and access than would occur if the seacave were allowed to collapse, resulting in the need to construct seawalls and upper bluff structures.

Construction of a seawall and/or upper bluff protection is associated with a number of adverse impacts to public resources, including loss of the public sandy beach area displaced by the structure, "permanently" fixing the back of the beach, which leads to the narrowing and eventual disappearance of the beach in front of the structure, and a reduction/elimination of sand contribution to the beach from the bluff. Other impacts of seawalls include sand loss from the beach due to wave reflection and scour, accelerated erosion on adjacent unprotected properties and the adverse visual impacts associated with construction of shore/bluff protective device on the contrasting natural bluffs.

In contrast, seacave plugs are set into the bluff face and do not take up a portion of the beach seaward of the bluff face currently available for public use. Because the structures are set within the bluff, the accelerated erosion from increased wave reflection and "edge effects" to adjacent properties associated with seawalls are reduced or avoided. Further, seacave plugs do not prevent the erosion of bluff face material onto the beach via subaerial erosion since they do not cover any portion of the bluff as a seawall or upper bluff work would. In addition, in the case of the proposed project, the fill material has been designed to allow the fill to erode at the same rate as the adjacent bluffs. Thus, the back of the beach would not be permanently fixed in place.

However, like a seawall, seacaves do have an adverse impact on shoreline processes in that by reducing the risk of bluff collapse, the sandy material of the bluff does not contribute to the beach as it eventually would if the site were left unprotected and the bluffs allowed to erode naturally. Thus, by reducing beach nourishment material, filling of seacaves or notched areas does adversely impact beach access and recreation. And although seacaves plugs tend to be smaller in height and width and thus less visually obtrusive, they do alter the natural landform of the bluffs, and, if not carefully constructed and monitored, can be very conspicuous.

In reviewing requests for shoreline protection, the Commission must assess the need to protect private residential development with the potential adverse impacts to public

resources associated with construction of shoreline protection. In this particular case, as noted above, the proposed project is a preventative measure and is not required to protect the existing bluff-top structures. The proposed project is significantly different in scope and scale than other seacave plugs approved by the Commission in the past. A more "typical" seacave fill project might consist of filling a cave 8-10 feet high, 10-12 feet wide, and 10-15 feet deep. These types of seacaves generally form when erosion impact creates seacaves defined along ancient fault and fracture zones. By filling a particular cave, an extensive bluff collapse, and possibly construction of more massive amounts of shoreline protection, can be forestalled indefinitely with relative little impact on sand supply and the visual quality of the bluffs.

In contrast, the proposed fill would be 400 feet long, and up to 19 feet high. Although the project is proposed to be colored and textured to reduce the visual impact of the project, it will still be a very prominent feature on the bluff. Unlike an individual cave, the irregular notching and overhanging of the bluffs is the defining feature of the landscape in the area, and filling the area would significantly change the character of the natural landform.

The process of gradual undercutting and notching of the bluffs seen at the subject site represents the natural process of bluff retreat and erosion in North County. The process has clearly accelerated in Solana Beach over the last several years as the amount of sand on the beaches has decreased and the bluffs are subject to more frequent wave action. Nevertheless, the amount of undercutting on the subject site is not significantly greater or different than that present on the bluffs elsewhere in Solana Beach or, in fact, in the majority of North County. Approval of the proposed fill at the subject site would set a significant adverse precedence for armoring the entire coastline of the region at the expense of the visual quality and shoreline processes of the public beach and bluffs.

The applicants have stated that the purpose of the project is to minimize risk to the beach-going public from sea cliff collapses, to preserve the visual aesthetics of the sloping portion of the bluff, and to prevent erosion that could result in a future need to construct a more intrusive protection device. However, there are a variety of alternatives to the proposed project that could address these concerns without placement of structures on the public beach or bluff, and with less impacts to coastal resources than the proposed fill project. Public safety issues are a concern at the project site, as they are along all bluffs that are subject to erosion and episodic failure. However, signage and public education measures can and should be used by local governments to warn the public of the potential dangers and help reduce the threat to the beach-going public from periodic bluff collapses.

Beach replenishment efforts, if successful, would enable the public to maintain a greater distance from the bluffs, and would minimize the frequency of wave action on the bluffs. Beach replenishment projects are an alternative that could reduce the amount of wave action the bluffs receive and limit cobble abrasion, significantly reducing the rate of undercutting and bluff retreat. Three sand replenishment projects have already been approved in Solana Beach, including the on-shore deposition of 570,000 cubic yards of

sand on Solana Beach beaches from Cliff Street to Dahlia Street (which including the subject site) associated with the Federal Navy Homeporting project (CD-95-95; CD-29-97). Placement of 44,000 cubic yards of sand associated with the grade separation/beach nourishment project was approved by the Commission in October 1995 for deposition at Fletcher Cove (#6-94-207). A pilot program for the deposition of approximately 6,500 cubic yards of sand on the beach at Fletcher Cove and 2,000 cubic yards of material at Tide Beach Park was approved by the Commission in July 1998 (#6-98-68) and is currently underway. Any of these projects could reduce the need for shoreline protection over the short or long term, and additional projects should be pursued. However, the Commission feels it is important to recognize that the beach and ocean area is a variable and unpredictable environment, and it would be impossible to completely eliminate all threats to public safety in this setting.

With regard to the preserving the visual quality of the existing slope of the upper bluffs, the proposed project would eliminate the undercut area thereby reducing "chunking" off of the midbluff area, which reduces the horizontal extent of the upper slope. However, as discussed above, the landform of the lower bluff is in itself a part of the natural visual quality of the landscape. The bluffs along this section of the Solana Beach coastline currently remain in a natural state, with virtually no existing bluff or shore protection other than seacave fills from just north of Fletcher Cove to Tide Park, an approximately one-quarter mile stretch of beach. The proposed project would replace the natural bluff face with an artificial vertical surface, thereby impacting the appearance of the whole bluff landform to a much greater extent than allowing bluff retreat to continue.

The applicants have indicated that the existing bluff-top structures are not in danger at this time, but that eventually, if the existing overhangs are allowed to collapse, the existing bluff-top improvements will be threatened. However, the Commission is currently reviewing a request, scheduled to be heard at the February 1999 Commission meeting, for a 1,355 sq.ft. first and second story addition to the existing one-story single-family residence located at 215 Pacific Avenue, which is the bluff-top lot in the middle of the seven bluff-top lots above the proposed notch fill. A geotechnical evaluation submitted by the project applicant states that the overall static stability of the property is grossly stable and that the bluff has a "low to moderate potential for erosional rilling and future surficial instability". The report indicates that the proposed addition, which would be set back from the bluff edge a minimum of 40 feet, should not be affected by the maximum anticipated coastal bluff retreat processes for 75 years, and that the existing residence (set back approximately 32 feet) may also not be threatened for 75 years.

Therefore, given that at least one of the bluff-top structures above the project site may in fact not be threatened by erosion for 75 years, it would be extremely premature to commit the subject bluffs to shoreline protection, with all the attendant adverse impacts on public resources, at this point in time. In order to reduce the potential that more extensive shoreline protection will be required in future, the applicants should be pursuing alternative means of protecting their residences before the structures are jeopardy. These alternatives include underpinning the residences, removal of accessory structures or seaward portions of the homes, installation of groundwater controls, diversion of

drainage away from the bluffs, elimination of irrigation within the bluff-top setback, and bluff-appropriate plantings. All of these alternatives should be explored and implemented before committing the public beach and bluff to shoreline protection.

In the past, the Commission has indicated that construction of a minimal amount of shoreline protection could be approved as a preemptive measure if approached as part of a comprehensive plan to address coastal bluff recession and shoreline erosion problems at the beach, bluff, and bluff-top level. Such a plan should include at a minimum, strict bluff top setback requirements for new development and redevelopment, zoning and planning regulations to allow new development to build up rather than out, alternatives to shore/bluff protection such as beach sand replenishment, offshore refraction structures, or perched beaches, programs for removal of threatened portions of a residence or the entire residence, underpinning existing structures, an analysis of the impacts of shoreline structures on beach and sand area as well as mitigation for such impacts, programs for the reduction of groundwater, and measures to reduce the visual impacts of necessary/required protective structures.

In the context of such a comprehensive plan, it might be appropriate to approve some amount of shoreline protection on a preemptive basis because, if all of the various components of such a plan were implemented together, the Commission could expect that total armoring of the bluffs could be avoided, or at the very least, limited to the lower bluff only. However, in the case of the proposed project, the Commission has no such assurance. There are no plans for a broad scale groundwater management or irrigation reduction programs in Solana Beach at this time. As demonstrated by a proposal for a residential addition at 215 Pacific Avenue (ref. CDP #6-98-131), the Commission continues to receive requests to build larger bluff-top structures without any acknowledgement that perhaps the older seaward portions of the residence should be relocated or retired. There are no mitigation or any other programs designed to recognize and balance the problem of an eroding shoreline with the continued reasonable use of blufftop properties. In any case, shoreline protection should not be the first response to a potential threat to existing structures. Rather, it must be considered as an alternative only after all other less-environmentally damaging feasible alternatives are exhausted. In the absence of a comprehensive plan to reduce the long-term need for shoreline protection, approval of the proposed fill would be inconsistent with the coastal resource protection policies of the Coastal Act.

In summary, the existing primary bluff-top structures have not been demonstrated to be in danger from erosion. Therefore, the Commission is not required to approve shoreline protection under Section 30235 of the Coastal Act. The proposed notch fill will have significant adverse impacts on shoreline processes and visual quality of the site, and on the ability of the public to use and access the recreational resources of the site. There are a wide range of feasible alternatives available to address the potential future threat to the residences that would not involve significant adverse impacts to coastal resources and the construction of permanent shoreline structures on the public beach and bluff. None of these alternatives have been reviewed or discussed by the applicants. The applicants have not provided any mitigating or off-setting factors to the project, such as participation

in a comprehensive plan to address the overall protection and enhancement of the Solana Beach shoreline, which would reduce the impacts associated with the project. Therefore, the proposed project cannot be found consistent with Sections 30235, 30210, 30212, 30220, and 30251 of the Coastal Act and must be denied.

3. 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 cannot 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 an likelihood, prepare and submit a new LCP for the area to the Commission for review. 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 Commission certifies an LCP for the City.

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. As discussed above, the comprehensive plan is to 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.

It is critical that the City of Solana Beach also begin to 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 bluffs in this section of the Solana Beach coastline are mostly in public ownership and for the most part pristine, devoid of shore and bluff protection structures or private

access stairways. There is no evidence that the existing primary structures on the blufftop are in danger from erosion. As such, it is premature to commit this entire stretch of bluffs to armoring without a thorough analysis of alternatives. The Commission feels strongly that approval of the proposed project would send a signal that there is no need to address a range of alternatives to armoring for existing development. Planning for comprehensive protective measures should include a combination of approaches including limits on future bluff development, ground and surface water controls, beach replenishment, and even continual lower bluff protection constructed in substantial segments, as with the proposed project. As discussed above, decisions regarding future shoreline protection must be done through a comprehensive planning effort that analyzes the impact of approving shoreline protection on the entire City shoreline.

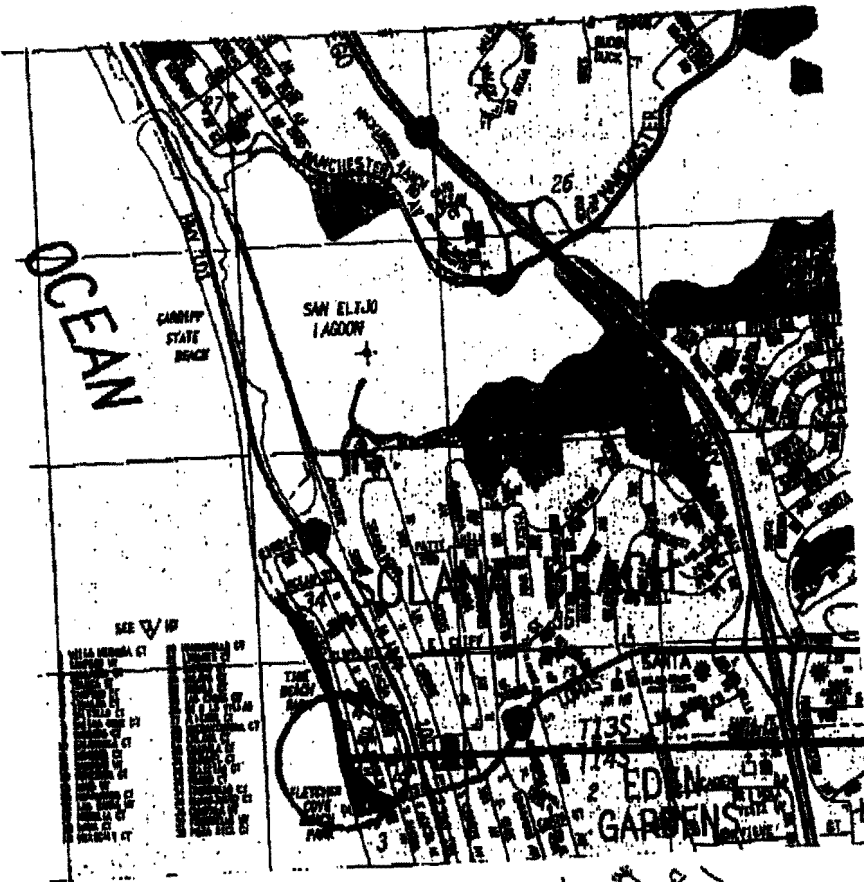
The project site is designated for Open Space Recreation in the City of Solana Beach Zoning Ordinance and General Plan, and was also designated for open space uses under the County LCP. The subject development is inconsistent with these designations. Based on the above findings, the proposed undercut fill cannot be found consistent with the Chapter 3 policies of the Coastal Act in that the need for the shoreline protection has not been documented and the project will be associated with significant adverse impacts on beach sand supply, visual quality, access, and recreation.

Therefore, the Commission finds the proposed development is inconsistent with the Chapter 3 policies of the Coastal Act, and will prejudice the ability of the City of Solana Beach to complete a certifiable local coastal program. Therefore, the project must be denied.

4. Consistency with the California Environmental Quality Act (CEQA).

Section 13096 of the Commission's Code of Regulations requires Commission approval of Coastal Development Permits to be supported by a finding showing the permit, as conditioned, to be consistent with any applicable requirements of the California Environmental Quality Act (CEQA). Section 21080.5(d)(2)(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 is inconsistent with the visual quality, shoreline processes, public access, and recreation policies of the Coastal Act. As detailed above, there are feasible alternatives available which would substantially lessen any significant adverse impact which the activity may have on the environment, including beach nourishment efforts, underpinning of residences, removal or relocation of portions of the existing structures, and groundwater, planting and irrigation management measures. Therefore, the Commission finds that the proposed project is not the least environmentally-damaging feasible alternative and cannot be found consistent with the requirements of the Coastal Act to conform to CEQA.



SITE

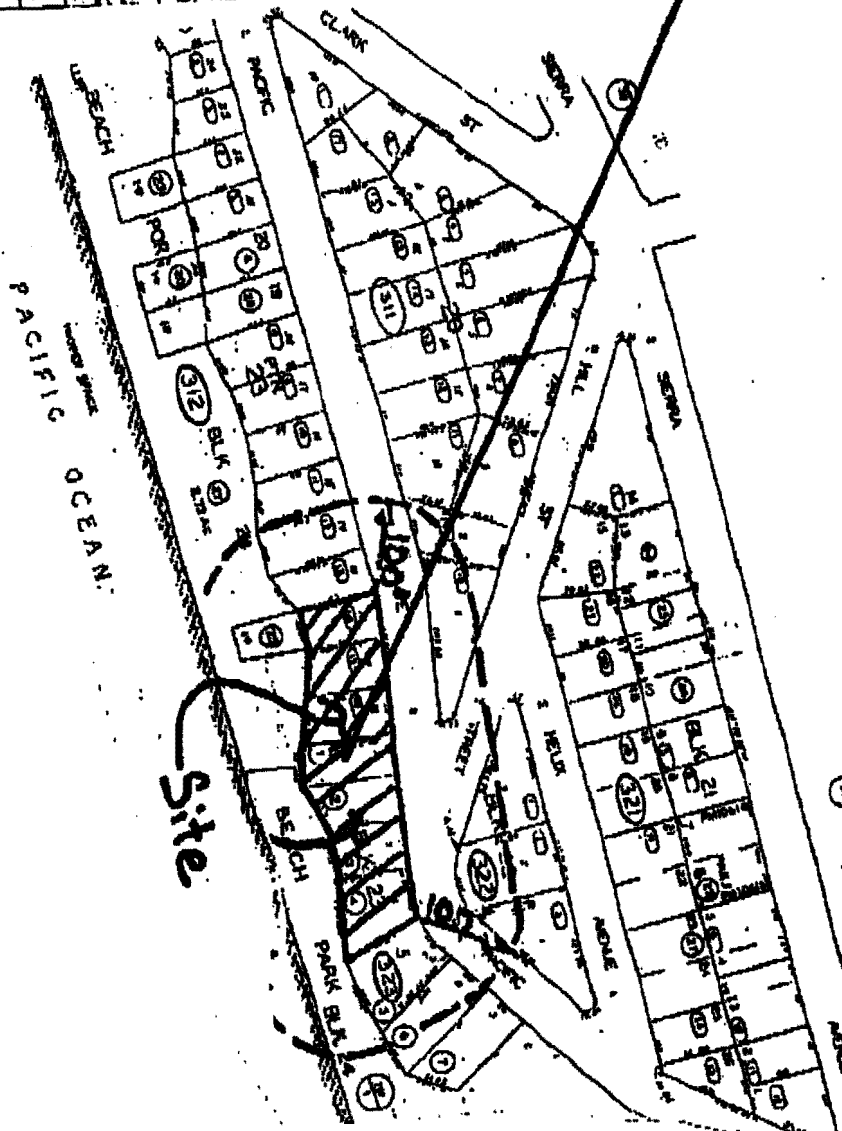


EXHIBIT NO. 1
 APPLICATION NO.
 6-98-144
 Location Map
 California Coastal Commission



PACIFIC AVENUE

HILL ST.

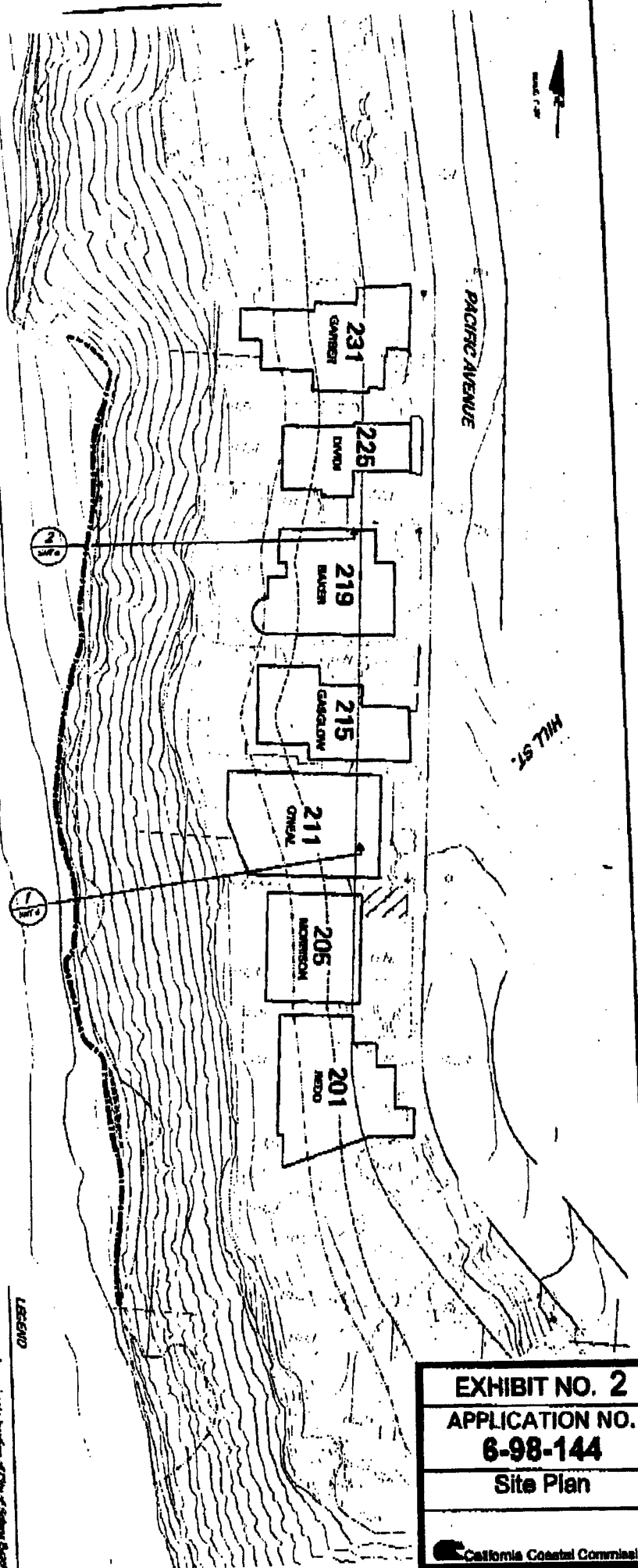


EXHIBIT NO. 2
APPLICATION NO.
6-98-144
Site Plan

California Coastal Commission

LEGEND

- Approximate boundary of City of Solana Beach situated from other counties
- Approximate boundary of County Commission 2.5 mile setback line from bluff
- Approximate boundary of Coastal Commission 400-foot setback line from bluff
- Proposed easement boundary
- Limitation of existing easement
- Units of easement/property ownership
- ② 2' 5' Limitation of easement boundary

DATE: 11/19/98
 DRAWN BY: J. GARDNER
 CHECKED BY: J. GARDNER
 PROJECT NO. 6-98-144
 SHEET NO. 1 OF 1

GROUP DELTA CONSULTANTS, INC.
 4000 S. GARDNER AVENUE, SUITE 100
 SAN ANTONIO, TEXAS 78249
 (512) 343-7777

NO.	DATE	BY	REVISION
1	11/19/98	J. GARDNER	ISSUE FOR PERMIT

SITE PLAN

CITY OF SOLANA BEACH

Scale: 1" = 20'
 Date: 11/19/98
 Sheet: 1 of 1

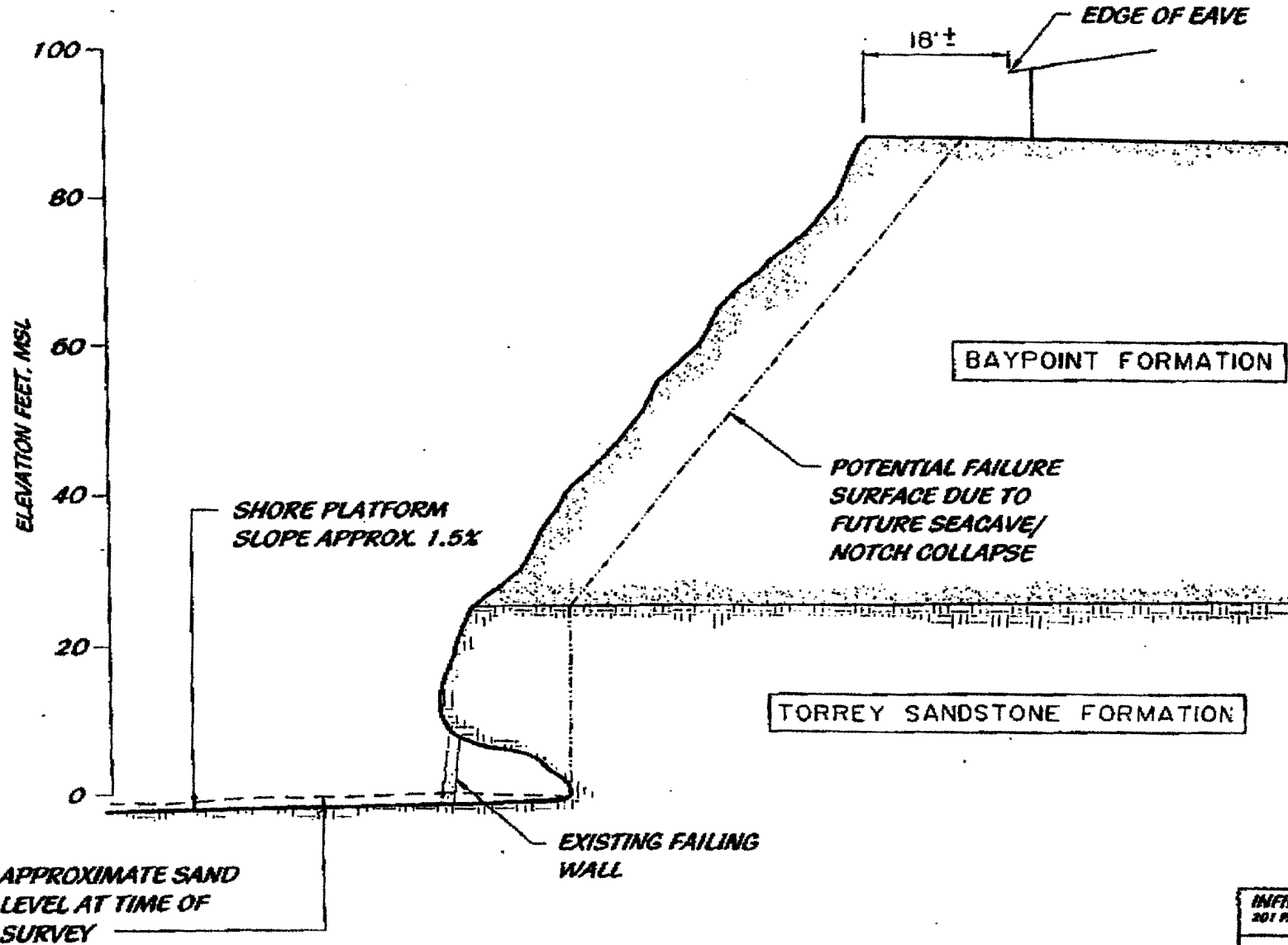
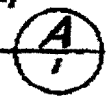


Figure No. 2

201 PACIFIC AVE - (REDD RESIDENCE)
SECTION - A

SCALE: 1"=20' (HORIZ.:VERT.)



INFILL GEOMETRIC DATA		
201 PACIFIC AVENUE		
DEPTH =	MAX: 17.0'	AVR: 9.5'
	MIN: 1.0'	
ELEV. =	MAX: 18.0'	AVR: 9.5'
	MIN: -1.0'	
LENGTH =	APPROXIMATELY 130'	

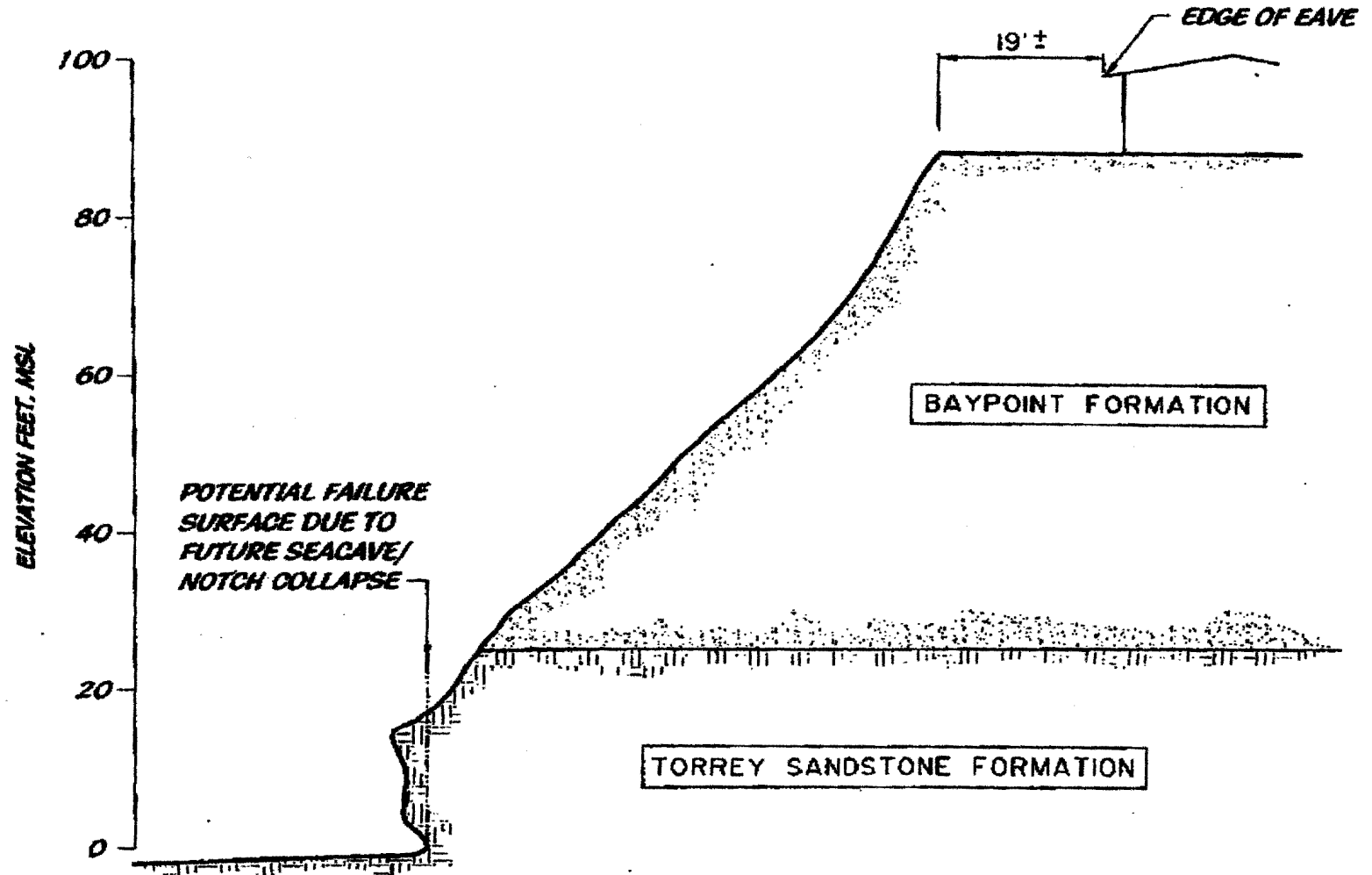


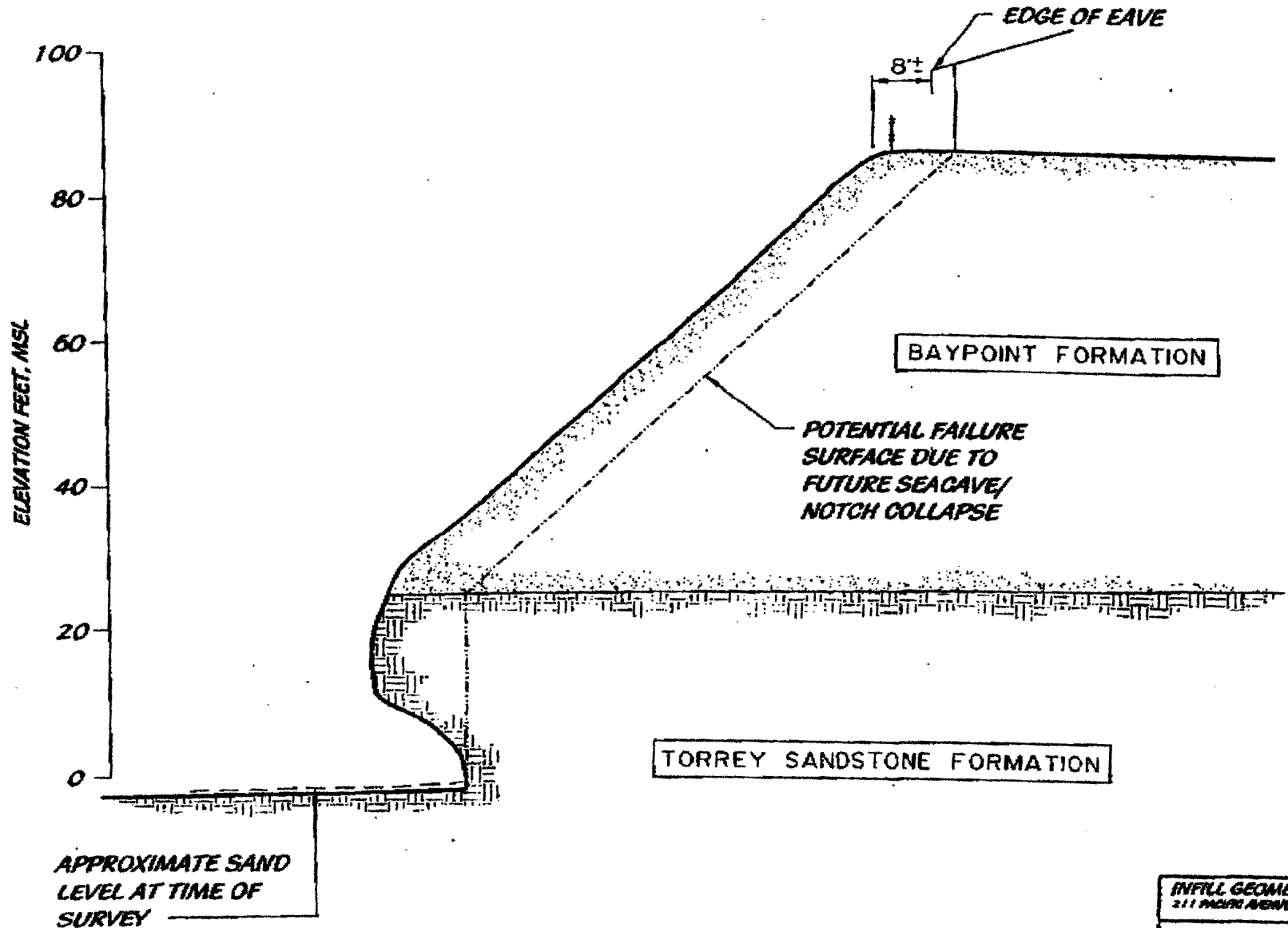
Figure No. 3

**205 PACIFIC AVE - (MORRISON RESIDENCE)
SECTION - B**

SCALE: 1"=20' (HORIZ.; VERT.)

B
1

INFILL GEOMETRIC DATA			
205 PACIFIC AVE			
DEPTH =	MAX: 11.0'	MIN: 1.5'	AVG: 7.0'
ELEV. =	MAX: 14.8'	MIN: -1.0'	AVG: 9.5'
LENGTH =	APPROXIMATELY 80'		



APPROXIMATE SAND
LEVEL AT TIME OF
SURVEY

211 PACIFIC AVE - (O'NEAL RESIDENCE)
SECTION - C

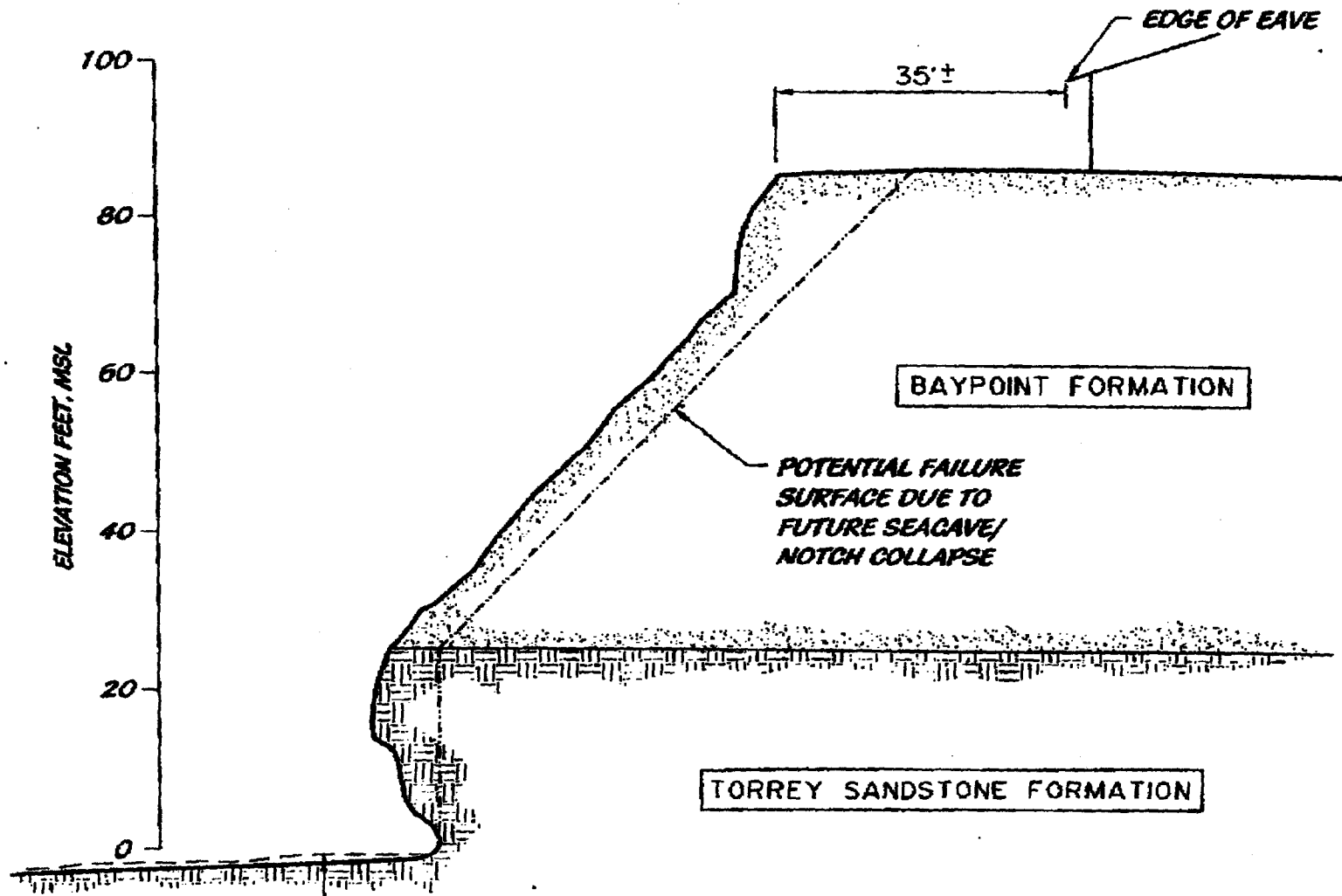
SCALE: 1"=20' (HORIZ., VERT.)

C
1

INFILL GEOMETRIC DATA
211 PACIFIC AVENUE

DEPTH =	MAX. 7.0'	MIN. 6.0'	AVG. = 7.0'
ELEV. =	MAX. 15.0'	MIN. 1.0'	AVG. = 6.0'
LENGTH =	APPROXIMATELY 50'		

Figure No.: 4



APPROXIMATE SAND
LEVEL AT TIME OF
SURVEY

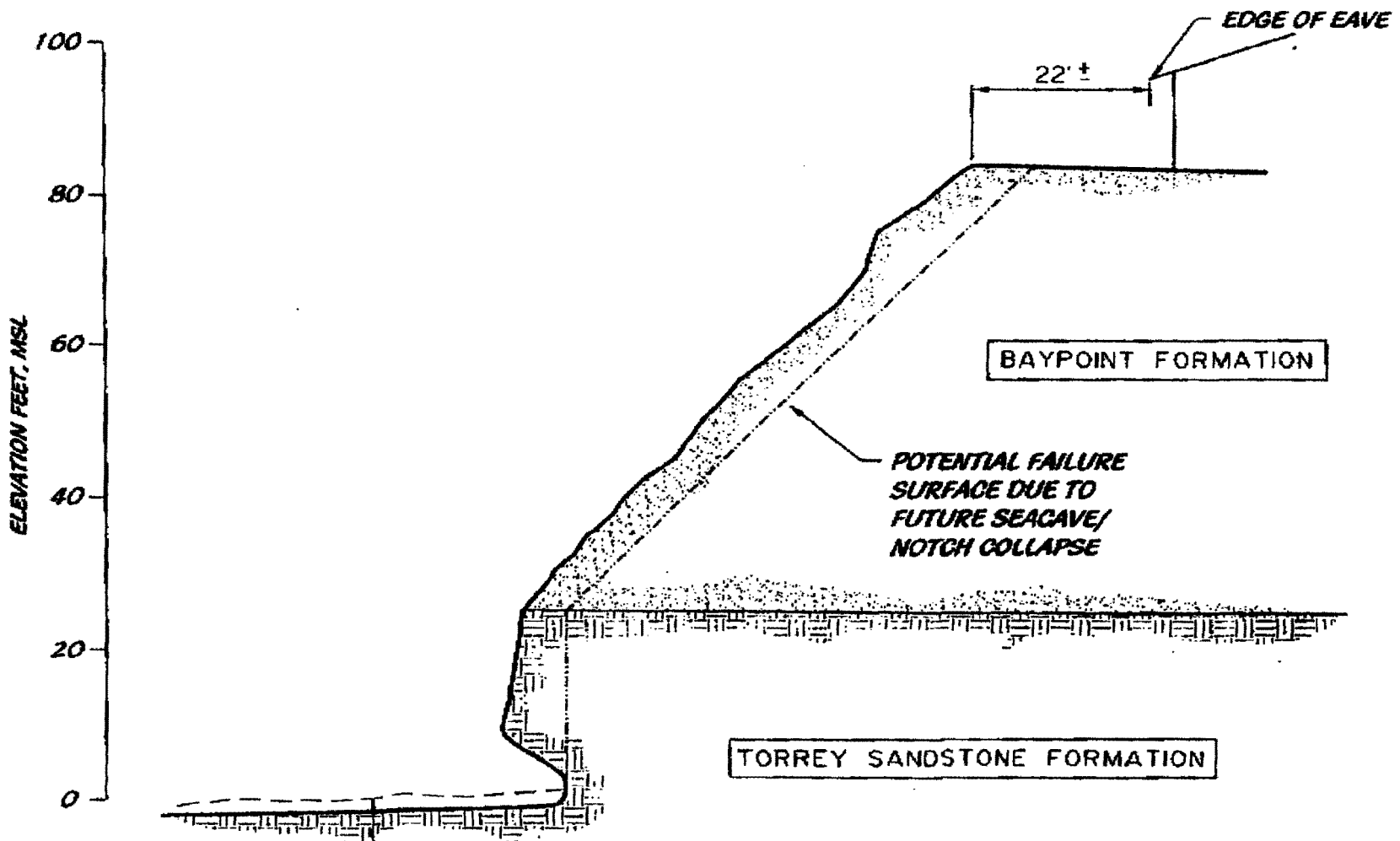
**215 PACIFIC AVE - (GLASGOW RESIDENCE)
SECTION - D**

SCALE: 1"=20' (HORIZ.:VERT.)



INFILL GEOMETRIC DATA 215 PACIFIC AVENUE		
DEPTH =	MAX. 6.0'	AVG. = 2.9'
	MIN. 1.5'	
ELEV. =	MAX. 15.0'	AVG. = 7.0'
	MIN. 6.5'	
LENGTH =	APPROXIMATELY 60'	

Figure No. 5



APPROXIMATE SAND LEVEL AT TIME OF SURVEY

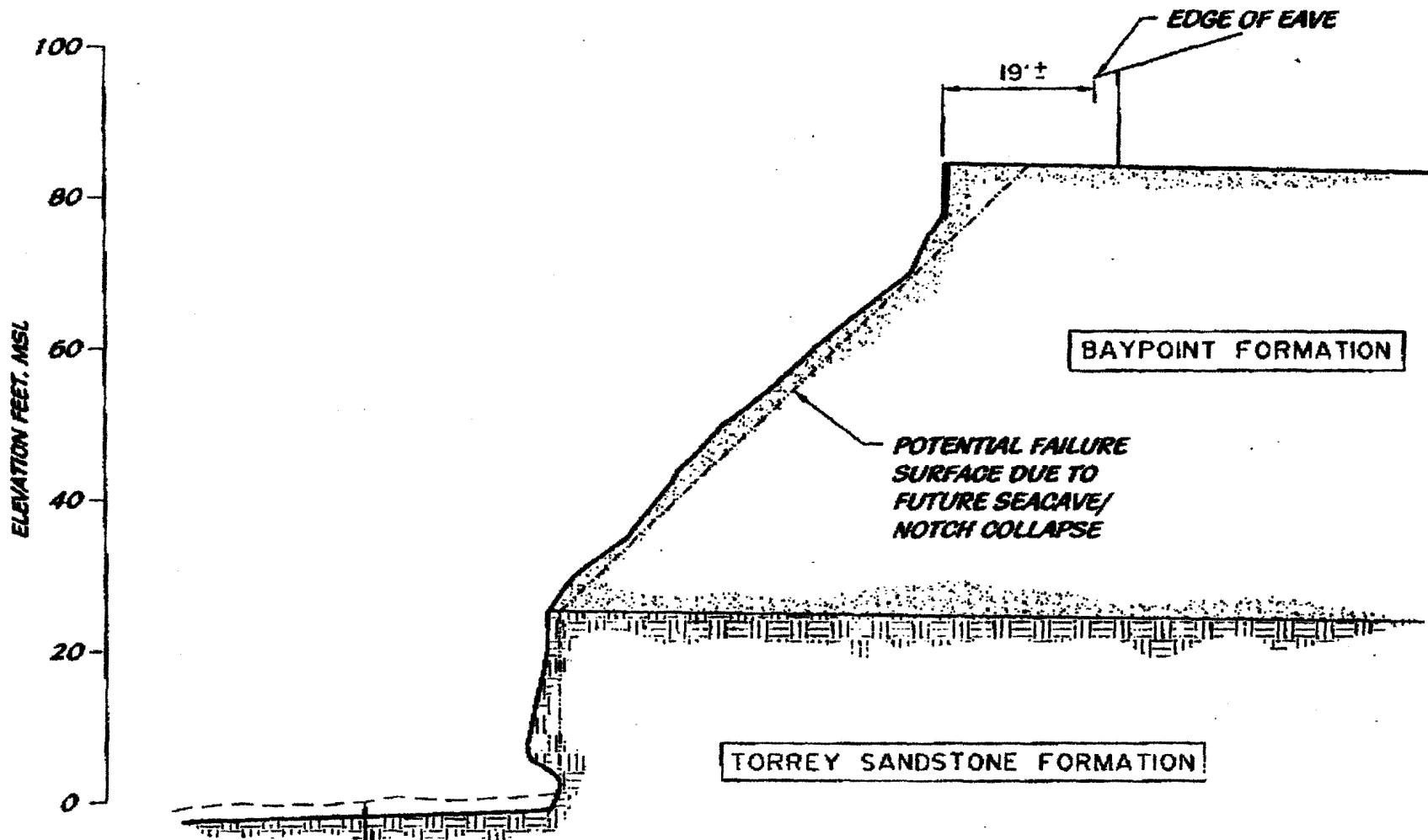
225 PACIFIC AVE - (DAVIDI RESIDENCE)
SECTION - F

SCALE: 1"=20' (HORIZ.:VERT.)

F
1

INFILL GEOMETRIC DATA			
225 PACIFIC AVENUE			
DEPTH =	MAX: 7.0'	MIN: 4.0'	AVG: 6.0'
ELEV. =	MAX: 8.5'	MIN: -1.0'	AVG: 5.0'
LENGTH =	APPROXIMATELY 80'		

Figure No: 7



APPROXIMATE SAND
LEVEL AT TIME OF
SURVEY

TORREY SANDSTONE FORMATION

BAYPOINT FORMATION

POTENTIAL FAILURE
SURFACE DUE TO
FUTURE SEACAVE/
NOTCH COLLAPSE

19' ±

EDGE OF EAVE

ELEVATION FEET, MSL
100
80
60
40
20
0

Figure No. 8

231 PACIFIC AVE - (GARBER RESIDENCE)
SECTION - G

SCALE: 1"=20' (HORIZ.:VERT.)



INFILL GEOMETRIC DATA 231 PACIFIC AVENUE			
DEPTH =	MAX. 4.0'	MIN. 4.0'	Avg. = 4.0'
WIDTH =	MAX. 6.0'	MIN. 1.0'	Avg. = 4.8'
LENGTH =	APPROXIMATELY 10'		