

CALIFORNIA COASTAL COMMISSION

SAN DIEGO AREA

3111 CAMINO DEL RIO NORTH, SUITE 200

SAN DIEGO, CA 92108-1725

(619) 521-8036



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 Staff: LRO-SD
 Staff Report: 2/1/99
 Hearing Date: 3/9-12/99

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REGULAR CALENDAR
STAFF REPORT AND PRELIMINARY RECOMMENDATION

Application No.: A-6-LJS-98-140

Applicant: DTC-RECP Opoc, c/o Desert Troon Investments, Inc.

Project Description: Reuse and restoration of the existing two-story, 105,000 sq.ft. vacant historic Scripps Clinic building to include construction of 33 condominium units within the existing structure, construction of a new two- and three-story, 30-ft. high, 55,107 sq.ft. structure to house fourteen townhomes above an existing three-level subterranean parking garage, improvements to the public right-of-way, landscaping and other site improvements on a 2.75 acre site.

Site: 464 & 467 Prospect Street, La Jolla, San Diego, San Diego Co.
 APNS 350-300-23 & 350-300-27

STAFF NOTES:

The hearing for the subject appeal/coastal development permit was opened at the January 12, 1999 Commission meeting. The Commission found substantial issue, directed the staff to do an analysis of the previously approved development on the site and continued the de novo hearing to a later date. Since that time, staff has researched the issue and determined that while it is not known how the City determined "existing grade" in 1982, the previously approved three-story, 30-unit condominium building over the existing subterranean parking garage attained a height of 30 feet and an elevation of +85.0 MSL. The newly proposed 14-unit townhome development which will be constructed above the same subterranean parking garage through the subject permit will be three-stories, 30-ft. high and will attain an elevation of +80.6 ft. MSL. Therefore, the new building will be four-and-a-half feet lower in elevation than the previously approved structure on the site in the same location and no impacts to the public viewshed associated with the view corridor is anticipated to occur.

Summary of Staff's Preliminary Recommendation:

Staff is recommending **approval** of the proposed development with a special condition that requires that any **proposed** landscaping at the south elevation of the proposed structure will not **encroach** into the public view corridor and that it be maintained so as not to obstruct views **to the ocean**.

Substantive File Documents: Certified La Jolla-La Jolla Shores Local Coastal Program (LCP); City of San Diego Coastal Development Permit No. 96-7888; Appeal Form dated 11/4/98; Mitigated Negative Declaration LDR No. 96-7888 dated 7/31/98; City of San Diego Planning Commission Report dated 9/10/98; CDP #s 6-89-207, 6-89-207 E1 – E7, and 6-82-454.

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. Final Landscape Plan/Deed Restriction.

a. PRIOR TO THE ISSUANCE OF THE COASTAL DEVELOPMENT, the applicant shall submit for the review and written approval of the Executive Director, a detailed landscape plan indicating the type, size, extent and location of all plant materials, the proposed irrigation system and other landscape features. Drought tolerant native or naturalizing plant materials shall be utilized to the maximum extent feasible. Special emphasis shall be placed on the installation and maintenance of the vegetation so as to assure that neither during growing stages nor upon reaching maturity will such materials encroach into the view corridor. Said plan shall be submitted to, reviewed and approved in writing by **the Executive Director**.

b. PRIOR TO THE ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicant shall record a deed restriction, in a form and content acceptable to the Executive Director, to ensure that the intent of this condition continues to be applicable throughout the life of the project. The restriction shall provide that landscaping shall be implemented in accordance with Special Condition #1 and consistent with those plans approved with CDP #A-6-LJS-98-140. The restriction shall be recorded, free of all prior liens and encumbrances except for tax liens, and binding on the permittee's successors in interest and any subsequent purchasers of any portion of the real property.

IV. Findings and Declarations.

The Commission finds and declares as follows:

1. Detailed Project Description. Proposed is the adaptive reuse and restoration of the vacant historic Scripps-Clinic building to construct 33 condominium units and a new 55,107 sq.ft., 30-foot high, two- and three-story building housing 14 townhomes. The townhomes will range in size from 3,212 sq.ft. to 3,400 sq.ft. and are to be constructed above an existing three-level, subterranean parking garage. Also proposed are improvements to the public right-of-way, landscaping and other site improvements on portions of a 2.75 acre site. The subject site is bounded by Prospect Street to the east, La Jolla Boulevard to the south and Coast Boulevard to the west (ref. Exhibit No. 1). The proposed 33 condominium units will be constructed in the existing two-story, 58 – 71 foot high (58 feet from Prospect Street, 71 feet from Scripps Lane), 105,000 sq.ft. vacant historic Scripps Building. In addition, a 9,152 sq.ft., two-story addition is proposed to the south end of this building. After interior remodeling, the proposed building will remain as a two-level structure from Prospect Street (its east elevation) but will appear as a three-level structure from Scripps Lane looking east. However, no increase to the height of this building is proposed.

The proposed 14 townhomes will be situated in a new structure comprising 55,107 sq.ft. in two and three-stories above an existing three-level subterranean parking garage. The roof of this garage is presently landscaped with turf and other landscape elements and extends in a northerly direction parallel to, and just west of Scripps Lane. There are also existing tennis courts on the site in this same vicinity. All of these improvements will be replaced with the proposed townhome structure. Access to the parking garage is taken from La Jolla Boulevard at the south elevation of the subject property and will not change with the proposed development. The property is a sloping lot descending in elevation from east to west (ref. Exhibit No. 5).

The existing vacant building known as the "Scripps and Copley" buildings, was designated as City of San Diego Historic Site No. 234 in April, 1989. This building (Building #1) will be developed with 33 condominium units which will total to 91,458 sq.ft. after remodeling, inclusive of the approx. 9,152 sq.ft. addition. The new structure proposed to house 14 townhomes (Building #2) will consist of both two and three-story

elements. A total of 99 parking spaces are required for the proposed 47 residential units which will be provided in the existing on-site parking garage which presently contains 315 parking spaces. The remainder of the parking spaces are reserved for the Timkin-Sturgis research building which is located at the far northwest corner of the property including 30 spaces for a commercial use and 14 spaces to be shared between the residential use and the Timkin building. The parking is reserved exclusively for all of the permitted uses on the subject site. No additional parking is required for the proposed development. The subject site is located about one-and-a-half blocks from the ocean and is not between the first public road and the Pacific Ocean. As such, the standard of review is consistency of the development with the certified LCP.

The site has been the subject of several past coastal development permits. Most recently, the Coastal Commission approved CDP #6-89-207 (Regency Associates, Ltd.) in September 1989 for the renovation and conversion of the Scripps building along with 6,000 sq.ft. of additions to the site for the construction of a 115-room, destination resort Scripps Hotel/Center Complex with accessory improvements. That permit was extended seven times with the last permit extension effective to 12/16/98. The approved development consisting of a hotel facility was never constructed. Other permits also included CDP #6-82-454 for demolition of existing laboratory/research facilities and parking lot for construction of 30 condominium units above a 340-space underground parking garage. The applicants vested that permit by doing the demolition work and constructed a 362 parking space garage; however, the 30 condominium units were never constructed. The Coastal Commission retained permit jurisdiction for this area in 1989 for the above-referenced permits because the downtown area of La Jolla, which was subject to the La Jolla Planned District Ordinance (PDO), remained an area of deferred certification until 1985 when the PDO was eventually certified by the Coastal Commission.

2. Visual Resources.

a.. Community Character/Height. Section 30251 of the 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..."

The basis of the appeal of this permit is with regard to the City's calculation of height. The appellants contended that the City incorrectly calculated the height with regard to the proposed townhome structure that will be situated above an existing three-level subterranean parking garage. The issue of public view blockage was not raised as issue in the appeal. The concern with building height related to the mass and bulk of the proposed structure in terms of its height. The appellants believed that the height of the townhome building should be determined from pre-existing grade that existed prior to the

construction of the parking garage. The parking garage was constructed in 1982 pursuant to Coastal Commission CDP #6-82-454. The City met with Commission staff and explained how height was determined for the proposed structure. The subject site is located in the downtown commercial core area of La Jolla where development regulations are subject to the requirements of the certified La Jolla Planned District Ordinance (PDO). On page 33 of the PDO under Section 103.1206 C. addressing "Maximum Height", it is stated:

The height of any point on any structure shall not exceed 30 feet. The height of any point on any structure shall be defined as the vertical distance between such point and the preexisting grade or finished grade, whichever is lower, directly below it.

Preexisting grade is that grade level which existed prior to the start of any site preparation, grading or construction related to the project being proposed.

In addition, in the citywide Municipal Code, which is part of the City's certified LCP, under Section 103.1206 entitled "Property Development Regulations", Paragraph C for "Maximum Height" states: "The maximum height of any point, on any structure shall be thirty (30) feet. Height shall be measured in accordance with Municipal Code section 101.0214(A) and (B)...."

Section 101.0214 of the Municipal Code addressing "Maximum Height of A Building or Structure" then states the following:

The maximum height of a building or structure shall not exceed the permitted height limit of the applicable zone or district...as calculated in accordance with the definitions of Height of a Building or Structure and the provision of subsections A, B and C of this Section.

A. Where a basement, underground parking structure, interior court or other similar interior area is proposed to be completely within the perimeter of a structure or completely below grade, pre-existing grade for that portion of the structure, shall be used to measure the height of a building or structure. [...]

In summary, the LCP provides that pre-existing grade is the grade that exists prior to the redevelopment of the property. The City determined that the proposed condominium project is a redevelopment of the property as it exists today – not a redevelopment of the property as it existed before the garage was constructed. Therefore, the City calculated the allowable height based upon the current grade. Thus, it measured the height of the townhomes from the elevation of the garage deck. In this case, the City limited the height of the newly proposed townhome structures to 30 feet above the existing parking structure deck. According to the City, based on a review of plans for the existing parking structure, the original lowest grade five feet from the parking structure was 44.7 ft. MSL, the elevation of the roof deck was at 49.0 ft. MSL and the finished grade after the deck was landscaped with turf, etc. was (and still is) 51.1 ft. MSL. Therefore, the existing

grade of the site where the parking structure is located is six feet above the "historic grade". Nevertheless, the City concluded that the grade which exists at the time the application for redevelopment of the site is submitted, which is 51.1 ft. MSL, is the elevation that should be used to determine height. As such, pre-existing grade at 51.1 ft. MSL, is the correct grade from which height is measured. The proposed finished grade of the townhome structure will range from 80.7 to 82.2 ft. MSL, but in no case will the difference between the existing grade and proposed finished grade exceed 30 feet in height, consistent with requirements of the certified LCP. Thus, as measured from a pre-existing grade of 51.1 feet MSL, the height of the townhomes does not exceed the 30 foot limit in the LCP. In this case, since pre-existing grade is lower than finished grade, the pre-existing grade is what must be used to measure building height.

The concern raised by the Coastal Commission at the 1/13/99 hearing on the appeal of the subject permit was with regard to how the proposed development compared to the previously-approved condominium building on the subject site under CDP #6-82-454. Since that time, staff has researched this issue. The building approved under the previous permit was for a three-story structure, which is the same number of stories proposed for the new building in the same location through the subject permit. From reviewing the south elevation of the permitted structure contained in the permit file, it appears that the City calculated the 30-foot required building height beginning at elevation +50.0 ft. MSL. The plans clearly show that this was above the +45.0 elevation which appears to be the top of the existing subterranean parking garage. The maximum height of the previously-approved building was +85.0 ft. MSL (reference Exhibit No. 9). The maximum height of the newly proposed structure at this location is +80.6 ft. MSL. Commission staff attempted to obtain information as to how the building height was calculated in 1982; however, the City Planning Department indicated that this information was not available. At the time of the approval of the original structure, the La Jolla Planned District Ordinance had not yet been approved or certified by the Coastal Commission. The La Jolla PDO was subsequently certified in 1985. Thus, it appears that the determination of height may have been different in 1982 than what was subsequently required in 1985 through the PDO. However, it must be recognized that even though the determination of "existing grade" or building height may have been different, the newly proposed three-story townhome structure will be four-and-a-half feet lower in height than the previously approved structure in the same location on the subject site. As such, the newly proposed structure will not impact public views to any greater degree than the structure that was previously approved on the subject site. The Commission, therefore, finds that the City's interpretation of "pre-existing" grade and its application to this project, can be found consistent with the certified LCP.

In addition, in the City's analysis of height, a special map was completed which showed an overlay of the highest points of the entire building, the measurement to grade, preexisting or finished, whichever was lower, throughout the entire site. The map verifies that throughout the site, at no point will the proposed structures exceed 30 feet in height. Therefore, although the appellants assert that the 30 foot height limit should be measured from the garage floor of the parking structure, this is not consistent with the

process of the certified LCP. Thus, the Commission finds that the City accurately calculated the height of the proposed building, measuring it from existing grade, which is the correct interpretation of the regulations. Thus, the development can be found consistent with the certified LCP.

In addition, it has been acknowledged that the the proposed development will encroach into the viewshed associated with the designated public view corridor. Since the permit is now the subject of the Commission's jurisdiction, the project has been conditioned for submittal of landscaping plans to assure that the proposed development will be consistent with the visual resource policies of the Coastal Act. The condition also requires that any proposed landscaping along the south elevation of the property or around the perimeter of the proposed townhome structure not exceed the elevation of the proposed structure nor encroach into the viewshed associated with the designated public view corridor. The condition further requires that the vegetation be maintained so that neither at maturity or growing stages, will it block ocean views to the west. In addition, the proposed development on the subject site will be compatible with the scale and character of the surrounding development. Surrounding uses include, in part, other multi-family residential uses and a private school. Also, the number of stories for surrounding uses varies from two- to five-stories. The taller structures in the surrounding area that exceed 30 ft. in height were constructed prior to the passage of the Coastal Act. Therefore, as conditioned, the proposed development can be found consistent with the community character and visual resource policies of the certified La Jolla-La Jolla Shores segment of the City of San Diego's certified LCP and with Section 30251 of the Coastal Act.

b. Public Views. Although the appellants' concern with the height of the structure relates to community character rather than public view blockage, the City's interpretation and application of the view protection policies of the LCP, and particularly the "view corridor" protection provisions is an important issue, which must be addressed in Commission review of this project. The subject property is bounded by Prospect Street to the east, Coast Boulevard to the west and La Jolla Boulevard to the south. Prospect Street is designated as a scenic roadway, and La Jolla Boulevard is designated as a Visual Access Corridor, in the certified La Jolla-La Jolla Shores LCP (ref. Exhibit No. 5). The portion of the site where the proposed townhomes will be located is in Zone 5A of the La Jolla PDO which has been identified because of its unique orientation to the ocean. The development standards for this subarea are intended to protect and enhance public ocean views. For this reason, the City did an extensive view analysis during the environmental review for the proposed project. In the environmental review (Mitigated Negative Declaration), it was stated that a view corridor is located adjacent to the site from the intersection of Prospect Street and La Jolla Boulevard looking west toward the Pacific Ocean. It was concluded that the proposed construction of the 14 townhomes over the existing underground garage would not create adverse impacts to this view corridor. The visual analysis include pictures from La Jolla Boulevard near Prospect Street looking west (ref. Exhibit Nos. 7 and 8). In addition, the City's findings for the coastal development permit state that the proposed development will not obstruct views to and along the ocean and other scenic coastal areas from public vantage points.

The City's findings further state that the proposed project has been analyzed to confirm that views from public vantage points to and along the ocean and other scenic coastal areas will not be encroached upon by the proposed townhomes. However, the report did not reiterate that the subject site is situated adjacent to a public view corridor, as was noted in the environmental review. In the visual analysis that was completed, two of the photographs show the existing ocean horizon views that are visible from La Jolla Boulevard looking west from Prospect Street which is designated as a scenic road in the LCP. In the "before construction" and "after construction" photographs, it can be seen that the proposed townhomes atop the existing parking garage will result in a small encroachment into the viewshed associated with the public view corridor. The Commission finds that there are viewsheds associated with public view corridors and scenic roadways which should be considered in the review of any proposed development adjacent to a designated public view corridor or scenic road, as is the subject site. As has been noted in other past Commission actions addressing public views, the Commission has found that the symbol of an arrow shown in a westerly direction on the visual access maps of the certified LCP means more than "linear" view to the ocean. Wherever a view corridor exists, there is a "viewshed" associated with such a view corridor that extends out on either side of the view corridor. The Commission feels that such public views through designated view corridors or from designated scenic roadways should be protected.

With regard to the subject project, if the view corridor is defined in a straight line down La Jolla Boulevard toward the ocean, it is apparent that the proposed townhome structure will not encroach into the view corridor. However, the proposed structure will encroach into a small portion of the viewshed associated with this public view corridor as defined by the Commission; however, the proposed encroachment into this view corridor is minimal and does not result in a significant public view blockage. Furthermore, the encroachment will not eliminate the ocean horizon view because after the townhomes are constructed, there will still be an ocean horizon view above the new development, as is shown in Exhibit No. 8. Since the proposed development will result in only a minimal encroachment into the public view corridor and will maintain the ocean views from the public vantage point, it is consistent with the LCP view protection policies. However, there remains the potential for any proposed landscaping associated with the proposed development to encroach into the public view corridor. Therefore, Special Condition #1 has been attached which requires the applicant to submit a final landscape plan and that proposed planting is maintained in order to assure that the vegetation does not impede public views to the ocean by encroachment into the view corridor. The condition requires recordation of a deed restriction such that future property owners will be notified of the landscape requirements concerning protection of the view corridor. In summary, the proposed development can be found consistent with the certified La Jolla-La Jolla Shores segment of the City of San Diego's certified LCP and with Section 30251 of the Coastal Act.

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, as conditioned, such a finding can be made.

The certified La Jolla-La Jolla Shores LCP Addendum contains numerous policies which call for the protection and improvement of existing visual access to the shoreline and that ocean views should be maintained in future development and redevelopment. There is presently an designated public view corridor along La Jolla Boulevard looking west from Prospect Street. The subject site is just north of, and adjacent to this view corridor. However, as noted previously, while a portion of the new structure proposed above the existing subterranean parking garage will encroach slightly into the viewshed associated with this view corridor. The project has been conditioned such that any proposed landscaping along the south elevation of the proposed structure shall not exceed the elevation of the proposed structure and that vegetation be maintained so as not to encroach into the public view corridor or block views to the ocean. With the attached condition, the Commission finds that public views to the ocean will be protected. As conditioned, the proposal can be found consistent with the certified LCP and visual resource policies of the Coastal Act. Approval, as conditioned, will not prejudice the ability of the City of San Diego to implement its certified LCP for the La Jolla area.

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 has been conditioned in order to be found consistent with the visual resource policies of the Coastal Act. In this case, there are feasible alternatives available which can lessen the significant adverse impact the project will have on public views to the ocean. The proposed condition addressing landscaping 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 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.

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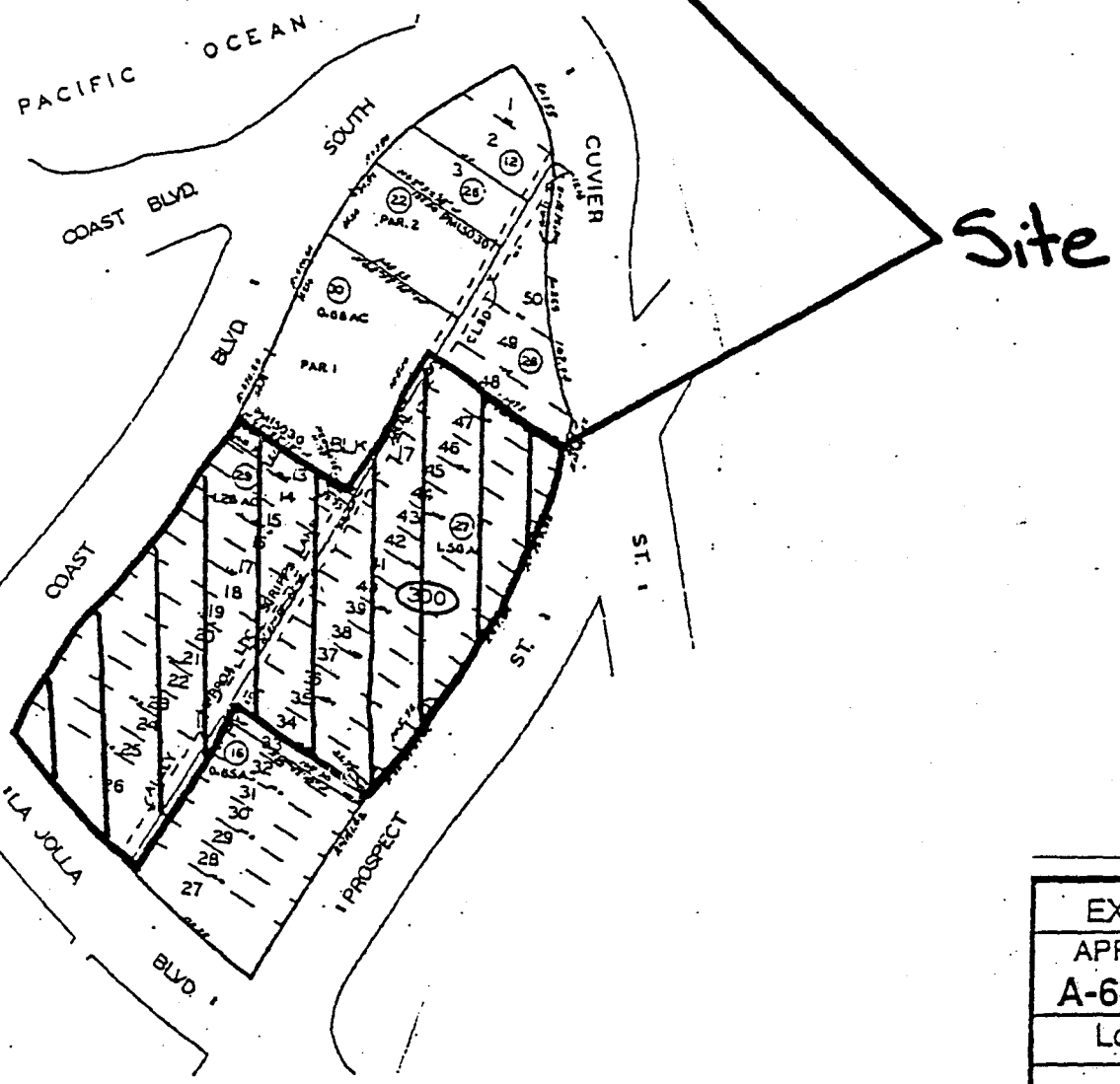
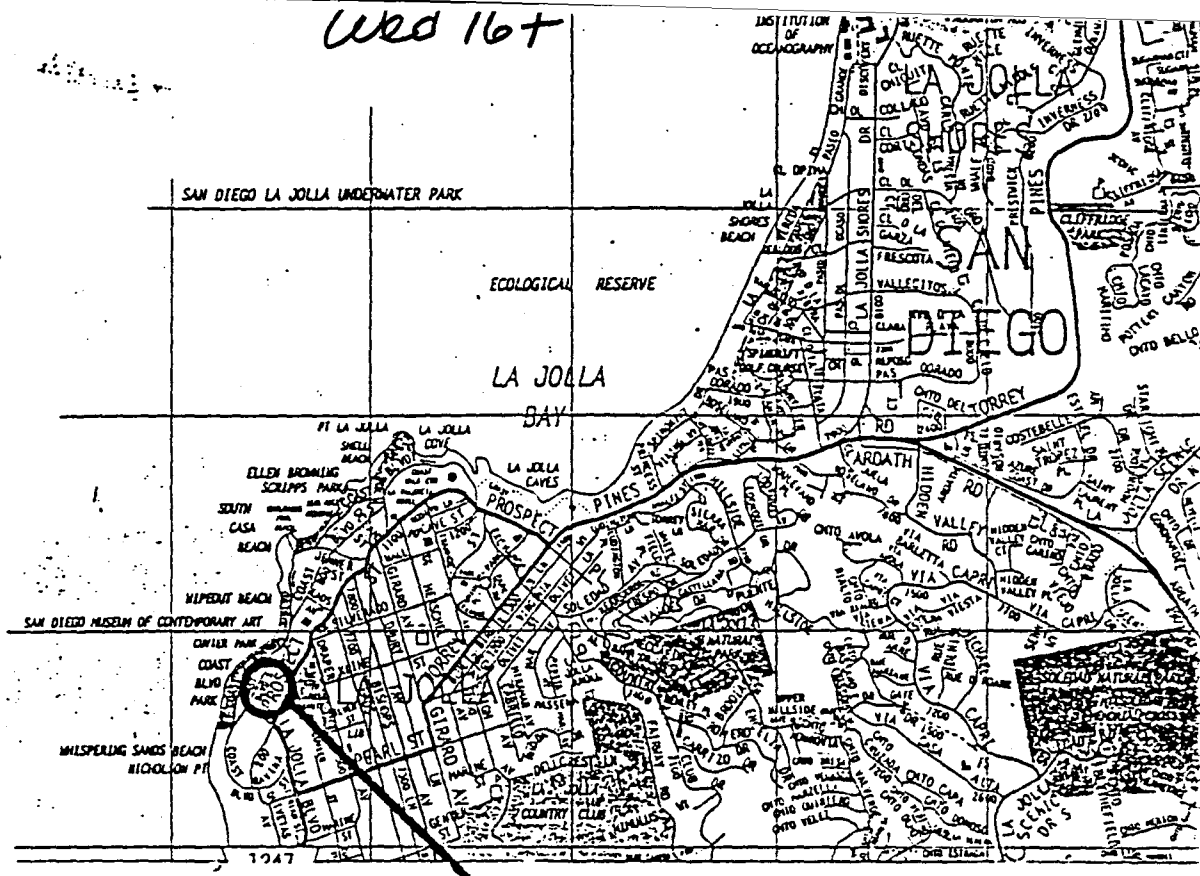
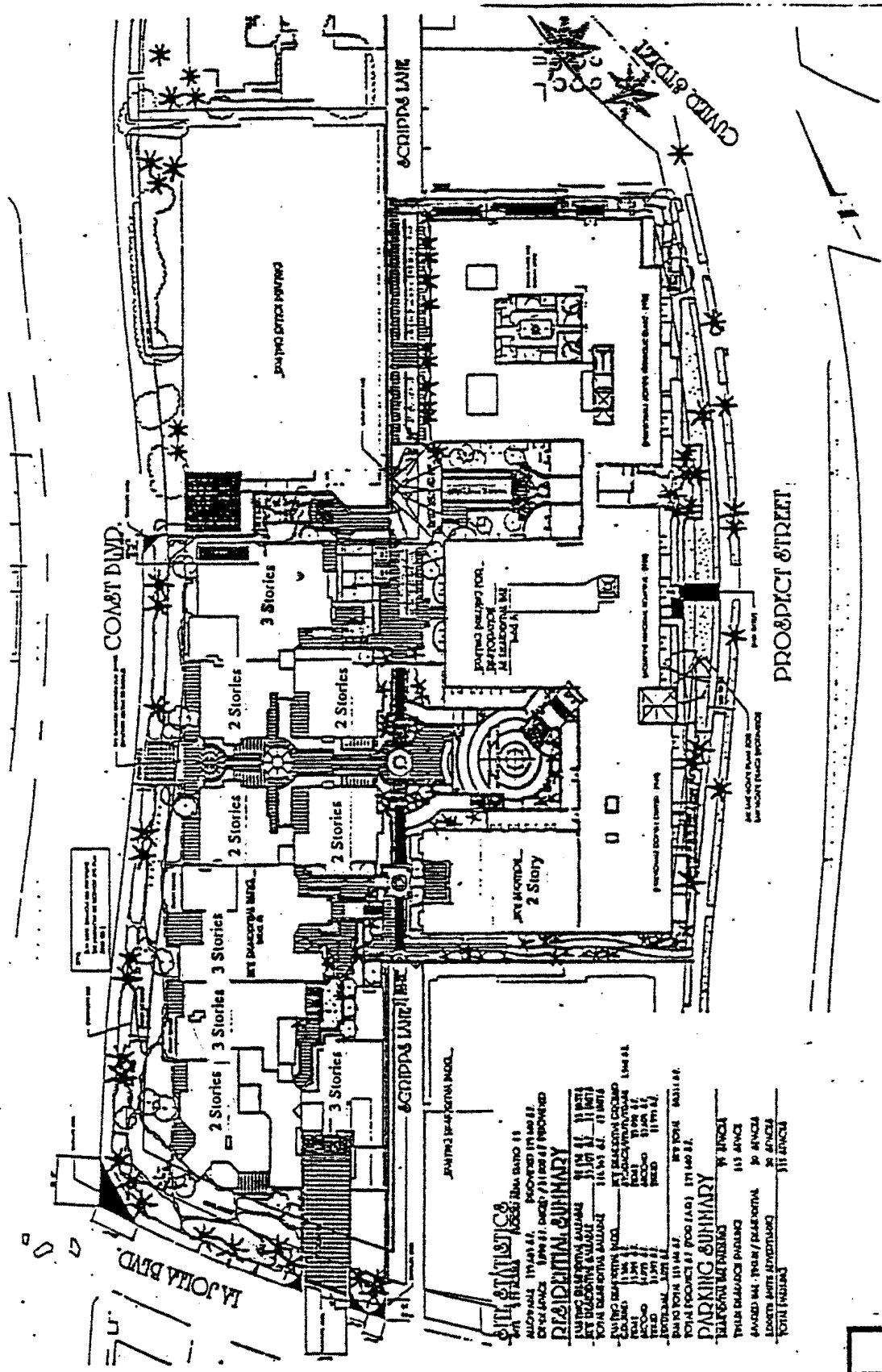


EXHIBIT NO. 1
APPLICATION NO.
A-6-LJS-98-140
Location Maps
California Coastal Commission



NOTE:
 1. SET BUILDING SHALL BE PROVIDED IN INTERIOR AND EXTERIOR AREAS
 2. NO EXTERIOR DARK CURB USE FOOTCANDLES

SITE PLAN
 1 - 20

RESIDENTIAL SUMMARY

APPROXIMATE TOTAL UNITS	111
APPROXIMATE TOTAL GROSS FLOOR AREA	111,000 SF
APPROXIMATE TOTAL GROSS VOLUME	111,000 CU FT
APPROXIMATE TOTAL GROSS FLOOR AREA PER UNIT	1,000 SF
APPROXIMATE TOTAL GROSS VOLUME PER UNIT	1,000 CU FT

PARKING SUMMARY

APPROXIMATE TOTAL PARKING SPACES	111
APPROXIMATE TOTAL GROSS FLOOR AREA PER SPACE	1,000 SF
APPROXIMATE TOTAL GROSS VOLUME PER SPACE	1,000 CU FT

EXHIBIT NO. 2
APPLICATION NO
A-6-LJS-9004
Site Plan

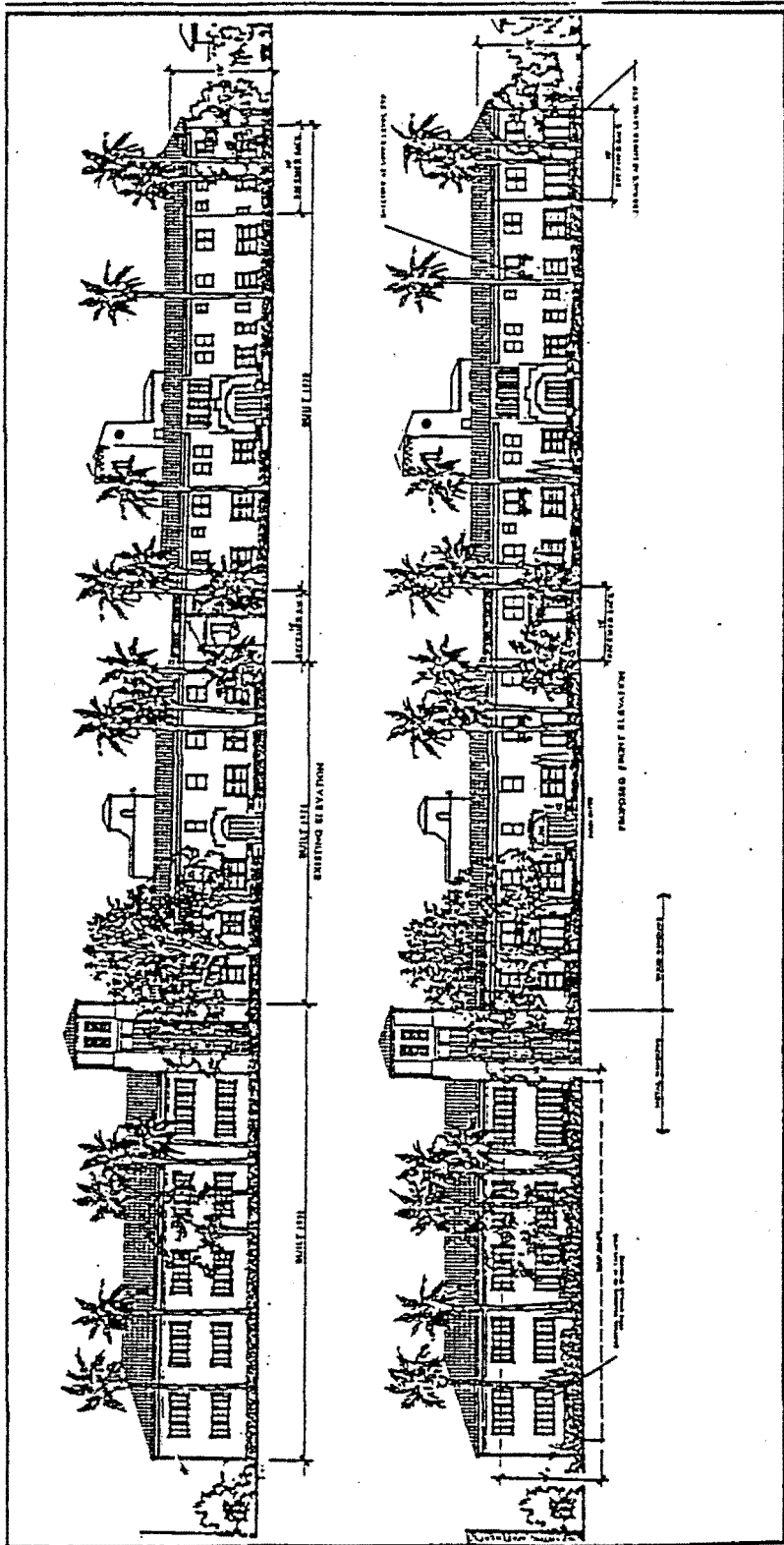


EXHIBIT NO. 3
 APPLICATION NO.
 A-6-LJS-98-140
 Building #1
 East Elevation
 (Prospect St.)

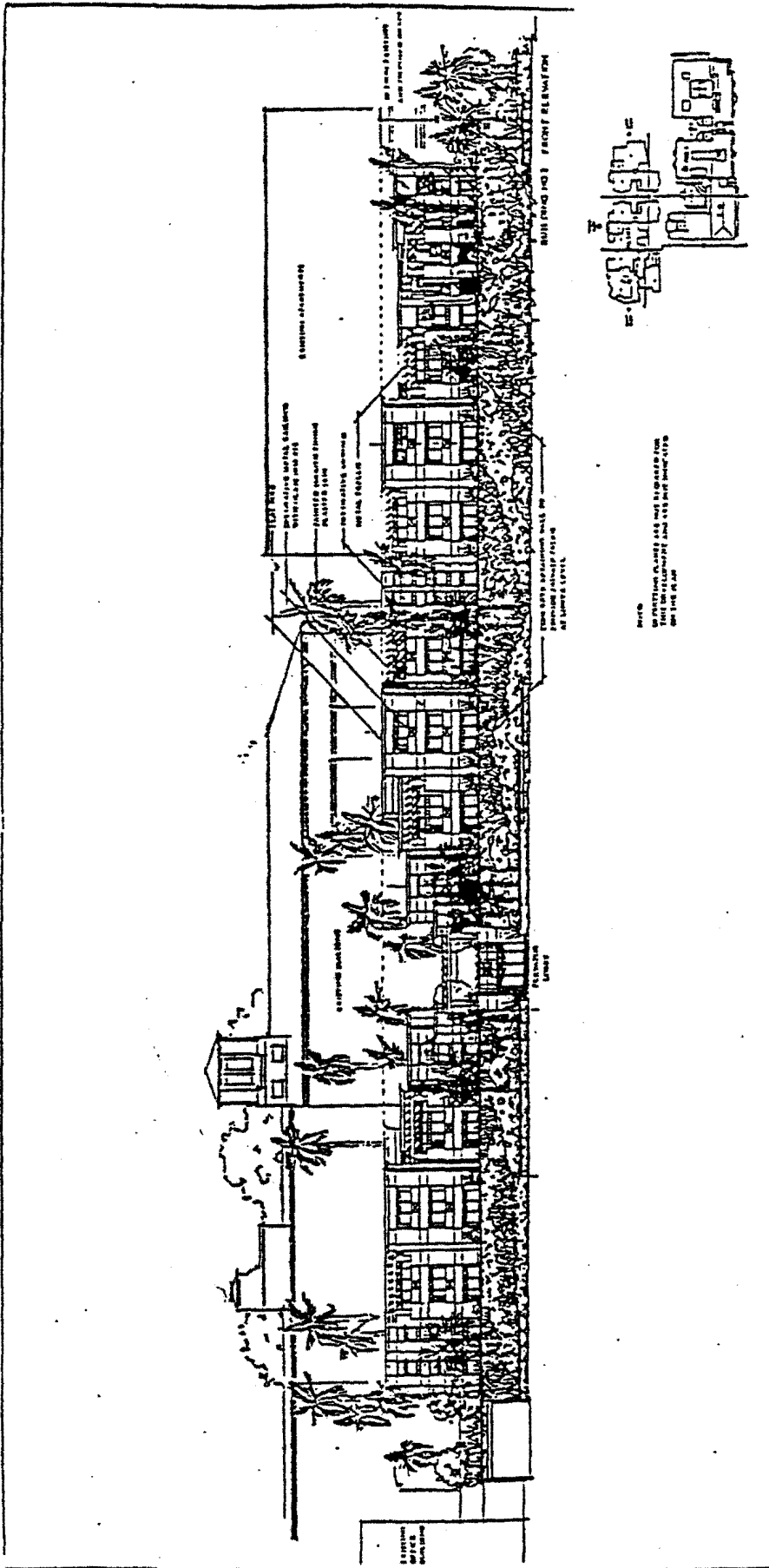


EXHIBIT NO. 4
 APPLICATION
A-6-LJS-98-140
 Building #2
 West Elevation
 (Coast Blvd.)

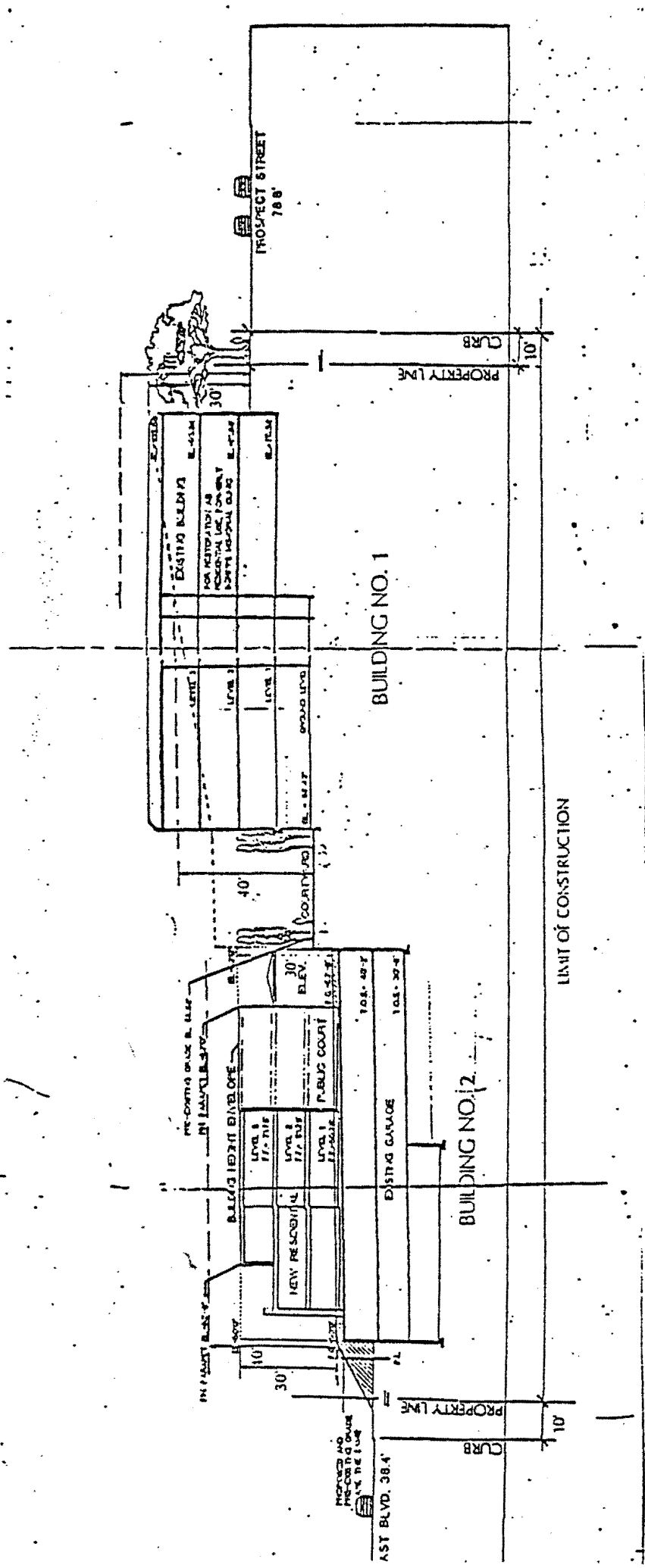
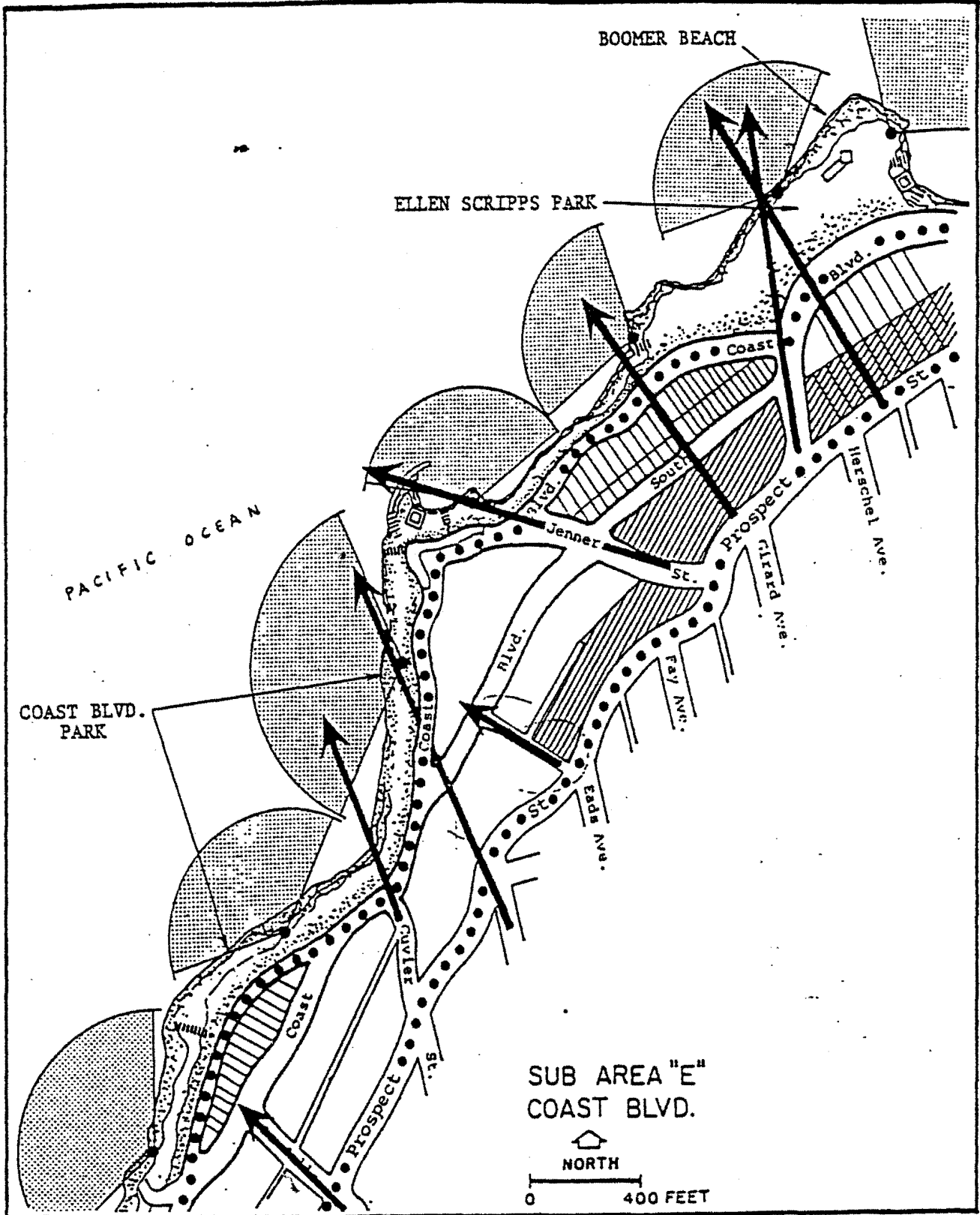


EXHIBIT NO. 5
 APPLICATION NO.
 A-6-LJS-98-140
 Building #2
 Cross-Section
 South Elevation
 (La Jolla Blvd.)



La Jolla • La Jolla Shores
LOCAL COASTAL PROGRAM • VISUAL ACCESS



- SCENIC ROADWAY
- ▲ MAJOR VISTA POINT
- ← VISUAL ACCESS CORRIDOR (existing)
- ▨ HIGH POTENTIAL

EXHIBIT NC 5
APPLICATION NO
A-6-LJS-98-14
Certified LCP
Access Corridor M

California Coastal Commission

Figure
5

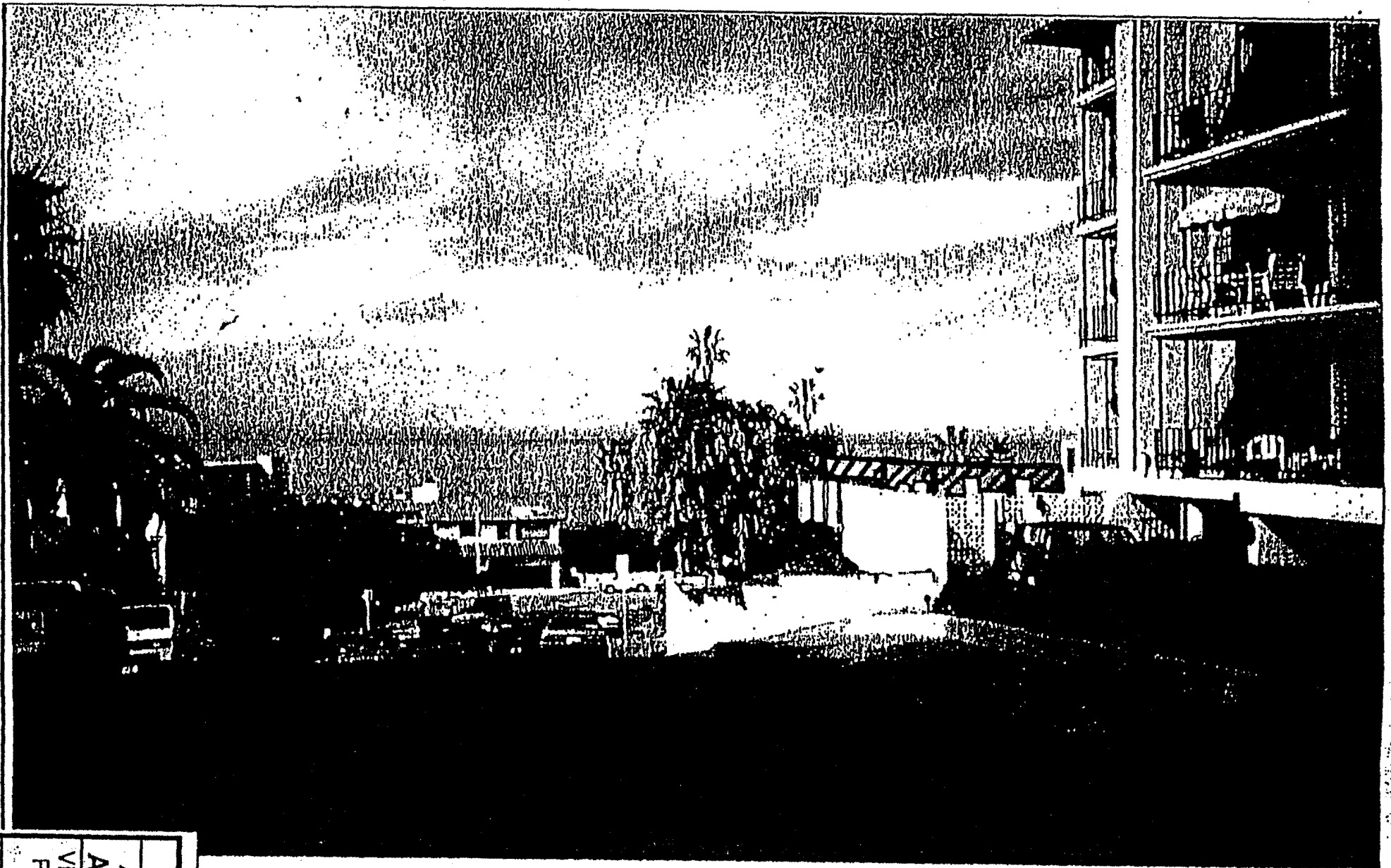


LDR No. 96-7888

Environmental Analysis Section
OF SAN DIEGO - DEVELOPMENT SERVICES

UAL ANALYSIS | Existing Condition

EXHIBIT NO. 7
APPLICATION NO.
A-6-LJS-98-140
Visual Analysis
Existing Condition
Looking West



Environmental Analysis Section
CITY OF SAN DIEGO - DEVELOPMENT SERVICES

LDR No. 96-7888

VISUAL ANALYSIS

Photo Simulation



= Area of Encroachment into the View Shed

Figure
6

EXHIBIT NO. 8
APPLICATION NO. 10
A-6-LJS-98-14
Visual Analysis of the
Project Completion

California Coastal Commission

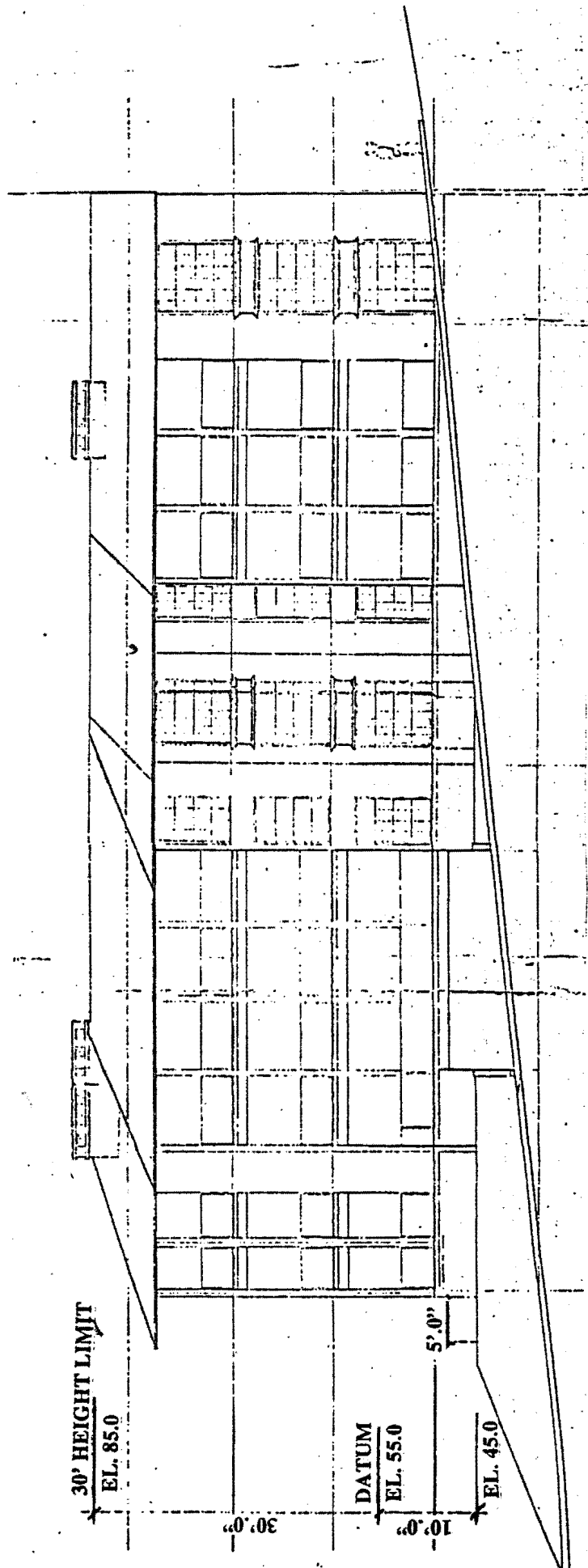



EXHIBIT NO. 9
 APPLICATION NO.
A-6-LJS-98-140
 South Elevation for
 30 Unit Condo
 Building Approved
 Under CDP
 #6-82-454
 California Coastal Commission

