

CALIFORNIA COASTAL COMMISSION

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Staff: WNP-SD
 Staff Report: May 12, 1999
 Hearing Date: June 7-11, 1999

STAFF REPORT AND RECOMMENDATION ON APPEAL

LOCAL GOVERNMENT: City of Oceanside

DECISION: Approval with Conditions

APPEAL NO: A-6-OCN-99-20

APPLICANT: James Wilt

PROJECT LOCATION: 1719 South Pacific Street, Oceanside, San Diego County.
 (APN 153-091-44)

PROJECT DESCRIPTION: Construction of a two-story, 27-foot high, 3451 sq.ft. single family residence on a 4,480 sq.ft. oceanfront lot and repair and maintenance of an existing riprap revetment.

APPELLANT: Jamie Phillips

SUBSTANTIVE FILE DOCUMENTS: Certified City of Oceanside Local Coastal Program; Regular Coastal Permit RC-2-98, Wave Uprush Studies by Hetherington Engineering Inc., dated May 31, 1990 and Skelly Engineering, dated April 27, 1999

STAFF NOTES:

At its March 10, 1999 hearing, the Commission found "substantial issue" exists with respect to the grounds on which the subject appeal was filed. This report is the staff recommendation on the de novo hearing.

SUMMARY OF STAFF RECOMMENDATION:

Staff recommends that the Commission find that the proposed development is consistent with the visual and public access policies of the certified Oceanside Local Coastal Program subject to conditions requiring final building plans, the recordation of a waiver of liability that indicates the applicant assumes the risk of developing the site, that construction responsibilities and debris removal shall be the responsibility of the applicant and that any change in the design of the revetment or future additions/reinforcement seaward of the riprap will require a coastal development permit.

Issues regarding the size and scale of the residence and the project's consistency with the "stringline" (seaward buildout of proposed development) have been addressed by way of a comparison of the size and scale of nearby ocean-fronting development with the proposed project and a review of the Oceanside LCP regarding application of the certified "Stringline Set back Map." The review indicates the proposed project is consistent with LCP provisions regarding ocean setbacks.

STAFF RECOMMENDATION ON THE COASTAL PERMIT

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 the certified City of Oceanside LCP and with the public access and recreation policies of the California Coastal Act of 1976 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 Building, Grading and Seawall Plans. Prior to the issuance of the coastal development permit, the applicant shall submit to the Executive Director for review and written approval, final building, grading and seawall plans for the proposed project that have been approved by the City of Oceanside. Said final building plans shall be in substantial conformance with the plans submitted with this application, dated 4/19/99 by John Jensen, Architect. Said final grading plans shall be in substantial conformance with the plans submitted with this application, dated 4/19/99 by Logan Engineering. Said final seawall plans shall be in substantial conformance with the plans submitted with this application, dated 4/27/99 by Skelly Engineering and indicate that repair and maintenance work shall not cause the revetment to extend further seaward than the pre-existing toe of the revetment as originally constructed. The permittee shall undertake development in accordance with the approved plans. Any proposed changes to the approved plans shall be reported to the Executive Director. No changes to the plans 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 each applicant understands that the site may be subject to extraordinary hazard from wave uprush and flooding and the applicant assumes the liability from such hazards; and (b) each 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.

3. Construction Responsibilities, Materials and Debris Removal. It shall be the responsibility of the permittee to assure that shoreline protection structures on adjacent properties are not damaged during construction on the permittee's property and to repair any damage to the adjacent property's shoreline protection structures that may be caused by the permittee's construction. Additionally, the permittee shall remove from the beach and revetment area any and all debris that result from the construction period. Disturbance to sand and intertidal areas shall be minimized. Beach sand excavated shall be redeposited on the beach. Local sand, cobbles or shoreline rocks shall not be used for backfill or construction material.

4. Maintenance Activities/Future Alterations. Any debris, rock or materials which become dislodged after completion through weathering and impairs public access shall be removed from the beach. Any change in the design of the revetment or future additions/reinforcement seaward of the riprap will require a coastal development permit. If after inspection, it is apparent repair or maintenance is necessary, the applicant should contact the Commission office to determine whether permits are necessary.

5. Construction Schedule/Staging Areas/Access Corridors. PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicant shall submit to the Executive Director for review and written approval, detailed plans identifying the location of access corridors to the construction sites and staging areas, and a final construction schedule. Said plans shall include the follow criteria specified via written notes on the plan:

- a. Use of sandy beach and public parking areas outside the actual construction site, including on-street parking, for the interim storage of materials and equipment is prohibited.
- b. No work shall occur on the beach on weekends or holidays during the summer months (start of Memorial Day weekend to Labor day) of any year.
- c. Equipment used on the beach shall be removed from the beach at the end of each workday.

- d. Access corridors shall be located in a manner that has the least impact on public access and existing public parking areas. Use of public parking areas for staging/storage areas is prohibited.

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

III. Findings and Declarations:

1. Project Description. The proposed development involves the construction of a two-story, 27-foot high, 3,451 sq.ft. living area, single family residence on a vacant 4,480 sq.ft. oceanfront lot. The subject site is located on the west side of Pacific Street in the City of Oceanside. The lot is 28.5 feet wide and extends westerly to the mean high tide line. The proposed structure is two stories over a basement with a maximum height of 27 feet from the existing grade. The street elevation is approximately 23 feet high. The residence is designed with 3 bedrooms, 3 baths, kitchen, living room, 2 offices, lower level beach room and 3 patios/balconies that total approximately 630 sq.ft. An elevator is also proposed which is accessed from the 2-car garage. The project maintains the required side yard setbacks (3 feet) as well as a 1-foot front yard setback, which is determined by a "block face average" of existing structures within the block area. No construction is proposed beyond the "stringline" which is measured 85 feet seaward from Pacific Street. An existing rock revetment seawall is located on the site and was required by the City to be repaired subject to the recommendations of a wave uprush study. No additional seaward encroachment is proposed to repair the revetment. The revetment was constructed prior to passage of the Coastal Act.

Because the proposed development is the subject of an appeal of a decision of the City of Oceanside, the standard of review is the certified Oceanside Local Coastal Program and the public access policies of the Coastal Act.

2. No Waiver of Violation. Subsequent to the City's approval of the project, repair work to the revetment was undertaken by the applicant (i.e., riprap was placed on top of the revetment). The City of Oceanside notified the applicant that the repair work was unpermitted and should be stopped and the revetment returned to its original shape pending the Commission's action on the appeal. The applicant has subsequently removed the unpermitted rock. Approval of the permit does not constitute a waiver of any legal action with regard to this violation of the Coastal Act that may have occurred; nor does it constitute admission as to the legality of any development undertaken on the subject site without a coastal development permit.

3. Visual Impacts/Compatibility/Stringline. Policy #8 of the "Visual Resources and Special Communities" section of the certified Oceanside Land Use Plan (LUP) states:

8. The City shall ensure that all new development is compatible in height, scale, color and form with the surrounding neighborhood.

The proposed structure is two stories over a basement with a maximum height of 27 feet from the existing grade. Although the proposed residence is larger than many existing older ocean-fronting structures in the area, it is typical of new development in size and scale. Staff has surveyed real estate information on ocean-fronting residential development on two blocks in the area for the year 1998-99. According to these records, the sizes of the homes in the surrounding area range in size from 806 sq.ft. to 4,465 sq.ft. (reference exhibit #5). The heights of these newer developments are also similar to that proposed by the applicant. Thus, the project is not grossly incompatible in size or scale with nearby development.

The certified LCP contains a requirement that new development along the ocean not extend further seaward than a "stringline". The goal of limiting new development to extend no further seaward than the stringline is to restrict encroachment onto the shoreline and preserve public views along the shoreline.

There is no specific land use plan policy that identifies the stringline. However, Section 1703 of the certified implementing ordinances (zoning code) addresses the stringline and states:

Section 1703 (e) (Rear Yard Setbacks)

Notwithstanding any other provisions of this section, buildings or structures located on lots contiguous to the shoreline shall be compatible in scale with existing development and shall not extend further seaward than the line established on the "Stringline Setback Map", which is kept on file in the Planning Division. Appurtenances such as open decks, patios and balconies may be allowed to extend seaward of the Stringline Setback line, providing that they do not substantially impair the views from adjoining properties.

The certified "Stringline Setback Map" was developed in 1983 by overlaying an imaginary stringline on an aerial photo of the shoreline in the City of Oceanside. The map shows how far new development may extend towards the ocean. The stringline map was based on existing building patterns, as well as anticipated future developments and remodels/expansions.

In this case the City approved the project by finding the project was within the limits of the development stringline as established in the certified LCP which was found to be 85 feet seaward of the inland right-of-way of Pacific Street, the fronting street. The stringline was measured from Pacific Street to the inland side of the stringline (rather than the seaward side of the stringline). The project proposes development to approximately 5-feet inland of the stringline and 28 feet landward of the easternmost extent of the existing revetment. An approximately 3-foot high garden wall is proposed

just seaward of the residence. No open decks, patios or balconies are proposed seaward of the Stringline Setback line even though the policy allows such development upon a finding that such development does not substantially impair the views from adjoining properties. Thus, the project can be found in conformance with the ocean setback provisions of the certified Oceanside LCP. Special Condition #1 requires final plans for the proposed project in substantial conformance with the submitted plans.

Regarding the preservation of visual resources, the stringline is typically used in the majority of LCPS to preserve public views but not private views. That is, by its limiting of the seaward encroachment of new development, the stringline setback preserves public views along and to the beach. However, in this case, Section 1703 (e) (Rear Yard Setbacks) of the certified Oceanside zoning ordinance allows open decks, patios and balconies to extend seaward of the Stringline Setback line, provided they do not substantially impair the views from adjoining properties. Thus, while private views are typically not preserved in most LCPs, the certified Oceanside LCP requires the preservation of private views along the shoreline, at least for development accessory to the main residence such as open decks, patios and balconies. In this particular case, no such accessory development is proposed beyond the stringline and public views along the shoreline will not be impacted.

The project site is not located within any special visual overlay areas. Major Finding #3 of the "Visual Resources and Special Communities" section of the certified LUP identifies that there are no developed vista points in Oceanside. Policy #7 of the same section identifies that development of sandy beach areas shall be restricted to those uses which are directly supportive of beach usage, such as restrooms, lifeguard towers, and recreational equipment. However, this policy is directed at public projects which propose development on the beach. Visual impacts of new development on oceanfronting lots is addressed by assuring that the project meet the requirements of the Stringline Map. The proposed project currently meets the ocean setback requirements of the certified LCP, in that it is consistent with the certified Stringline Setback Map. Thus, by meeting this requirement, the Commission finds the project has been designed to address visual resources and public access consistent with the ocean setback provisions of the certified LCP.

4. Shoreline Protective Device/Beach Encroachment. Currently riprap exists along the shoreline to protect the vacant subject site as well as adjacent properties from adverse storm conditions. According to City officials, the bulk of the existing shoreline protection on this part of the southern Oceanside shoreline was constructed at one time prior to the passage of the Coastal Act.

In its approval, the City required the applicant to prepare a "precise Grading and Private Improvement Plan" to reflect all pavement, flatwork, landscaped areas etc. and footprints of all structures including the onsite revetment. The City required that a wave study for the project is done or that the City's standard seawall detail is used. In this case, the applicant chose to provide the wave study because one had been done for the site in 1990.

Based on the recommendations of the wave study, the City conditioned the project to include reconstruction of the revetment.

The preliminary wave action study (1990) states that the existing riprap would need to be improved to adequately protect the site. The improvements would include the reshaping of the riprap, the additional placement of stones and construction of return sections. The wave study recommends that the revetment be returned to its original design by adding approximately 5 additional feet to the height of the existing revetment, which has deteriorated over time since its original construction at least 30 years ago. Based on these recommendations, the City found the above recommended seawall improvements were necessary to find consistency with the certified LCP.

In response to Commission staff concerns that the revetment not encroach farther onto the public beach the applicant prepared an updated wave uprush study. This study recommends that the revetment be returned to its original design by adding approximately 5 additional feet to the height of the existing revetment, which has deteriorated over time since its original construction at least 30 years ago. The 1999 study concludes that no additional seaward encroachment of rock is recommended or necessary over that originally constructed and the proposed residential development would be adequately protected by the repaired revetment. The report finds:

The revetment is currently entirely above the certified mean high tide line. The applicant only proposes to rehabilitate the revetment and increase the height a few feet. The proposed increase in height will extend the top of the revetment a few feet landward from its current position. The toe of the revetment will remain exactly where it is. The rehabilitation of the revetment is part of the grading plan for the project and will be subject to inspection by the City of Oceanside.

Section 19.B.18 of the certified Seawall Ordinance requires that shoreline protective devices not have an adverse impact on sand supply and coastal resources (public access).

Shoreline structures as defined in Article II shall be allowed when required to serve coastal dependent uses or to protect proposed or existing structures in danger from erosion and when designed to eliminate or mitigate adverse impacts on local shoreline sand supply and other coastal resources, and where the construction is in conformance with the City's Local Coastal Plan.

Based on the above, the Commission notes the revetment repairs meet the LCP standards with respect to the design of the revetment. Thus, the Commission finds the proposed repair work consistent with the certified LCP.

Special Condition #1 requires that the applicant submit final plans for the revetment repair, which indicate that no repair and maintenance work shall extend further seaward than the pre-existing toe of the revetment as originally constructed.

In addition, the applicant is proposing to construct the development in an area subject to wave and storm hazards. Although the applicant's study asserts that the proposed development can withstand such hazards and protect the proposed development from such hazards, the risk of damage to the structure cannot be eliminated entirely. The Commission finds that in order for the proposed development to be consistent with the Coastal Act, the applicants must assume the risks of damage from flooding and wave action. As such, Special Condition #2 requires the applicants to execute assumption of risk documents, waiving any liability on the part of the Commission for approving the proposed development. In addition, these conditions require the applicant to indemnify the Commission in the event that third parties bring an action against the Commission as a result of failure of the proposed development to withstand and protect against the hazards.

Special Condition #3 notifies the applicant that it is the responsibility of the permittee to assure that shoreline protection structures on adjacent properties are not damaged during construction on the permittee's property and to repair any damage to the adjacent property's shoreline protection structures that may be caused by the permittee's construction. Additionally, the permittee shall remove from the beach and seawall area any and all debris that result from the construction period. It also states that disturbance to sand and intertidal areas shall be minimized. Beach sand excavated shall be redeposited on the beach. Local sand, cobbles or shoreline rocks shall not be used for backfill or construction material.

Special Condition #4 requires that any debris, rock or materials which become dislodged after completion through weathering and impairs public access shall be removed from the beach and that any change in the design of the revetment or future additions and/or reinforcement seaward of the riprap will require a coastal development permit. If after inspection, it is apparent repair or maintenance is necessary, the applicant should contact the Commission office to determine whether permits are necessary.

In summary, while repairs are necessary to the existing revetment, no further seaward encroachment is necessary or proposed. As conditioned to provide final building, grading and seawall plans and to record a waiver of liability assuming the risk of developing the site, the Commission finds the proposed project conforms to the certified Oceanside LCP.

5. Public Access and Recreation. Section 30604(c) requires that a specific access finding be made for all development located between the sea and the first coastal roadway. The certified LCP contains provisions that call for the protection and enhancement of public access.

Major Finding #7 of the LUP provides:

7. The shoreline between Wisconsin and Witherby Streets is accessed by five 80 foot wide public "pocket" beaches, spaced at 450-foot intervals.

The subject site is located on the seaward side of Pacific Street. Because of the steepness of this hillside lot and because of the existing revetment, there is no evidence of public use of the site to access the beach. Vertical access to the public beach is provided about 400 feet south of the project site at Buccaneer Beach, one of the above-identified pocket beaches. Thus, adequate vertical access to the shoreline is located nearby.

Access policy #2 of the LUP provides:

2. New public beach access shall be dedicated laterally along the sandy beach from Witherby Street south to the City limits in conjunction with restoration of the beach or new private development, whichever comes first.

The project proposes to augment an existing revetment on-site in accordance with a wave uprush study. While repair work will occur to this revetment, no further seaward encroachment beyond the existing toe is proposed or permitted. To ensure that project construction would not affect public access, Special Condition #5 requires detailed plans identifying the location of access corridors to the construction sites and staging areas, and a final construction schedule. This condition also states that any proposed changes to the approved plans or the stated criteria shall be reported to the Executive Director. No changes to the plans or schedule shall occur without a Coastal Commission approved amendment to this coastal development permit unless the Executive Director determines that no amendment is required.

As conditioned to provide staging and construction plans, the Commission finds the proposed development consistent with the public access and recreation policies of the Coastal Act and the certified Oceanside LCP.

6. 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 is designated as RS (Residential Single Family) with an underlying land use designation of Residential Single Family Detached. The project is consistent with these designations. The certified Oceanside LCP contains policies which call for new development to be compatible with the scale and character of the surrounding development. In addition, the certified Stringline Setback Map calls for the preservation of visual access to the shoreline. Finally, the project will not adversely impact coastal access or recreation. Thus, the Commission finds the proposal can be found consistent with all applicable policies of the certified LCP as well as the public access and recreation policies of the Coastal Act.

7. Consistency with the California Environmental Quality Act (CEQA). Section 13096 of the Commission's administrative regulations requires Commission approval of a coastal development permit or amendment to be supported by a finding showing the

permit or permit amendment, 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 to be found consistent with the public access and visual policies of the Coastal Act and the Oceanside LCP. Mitigation measures 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.

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Site

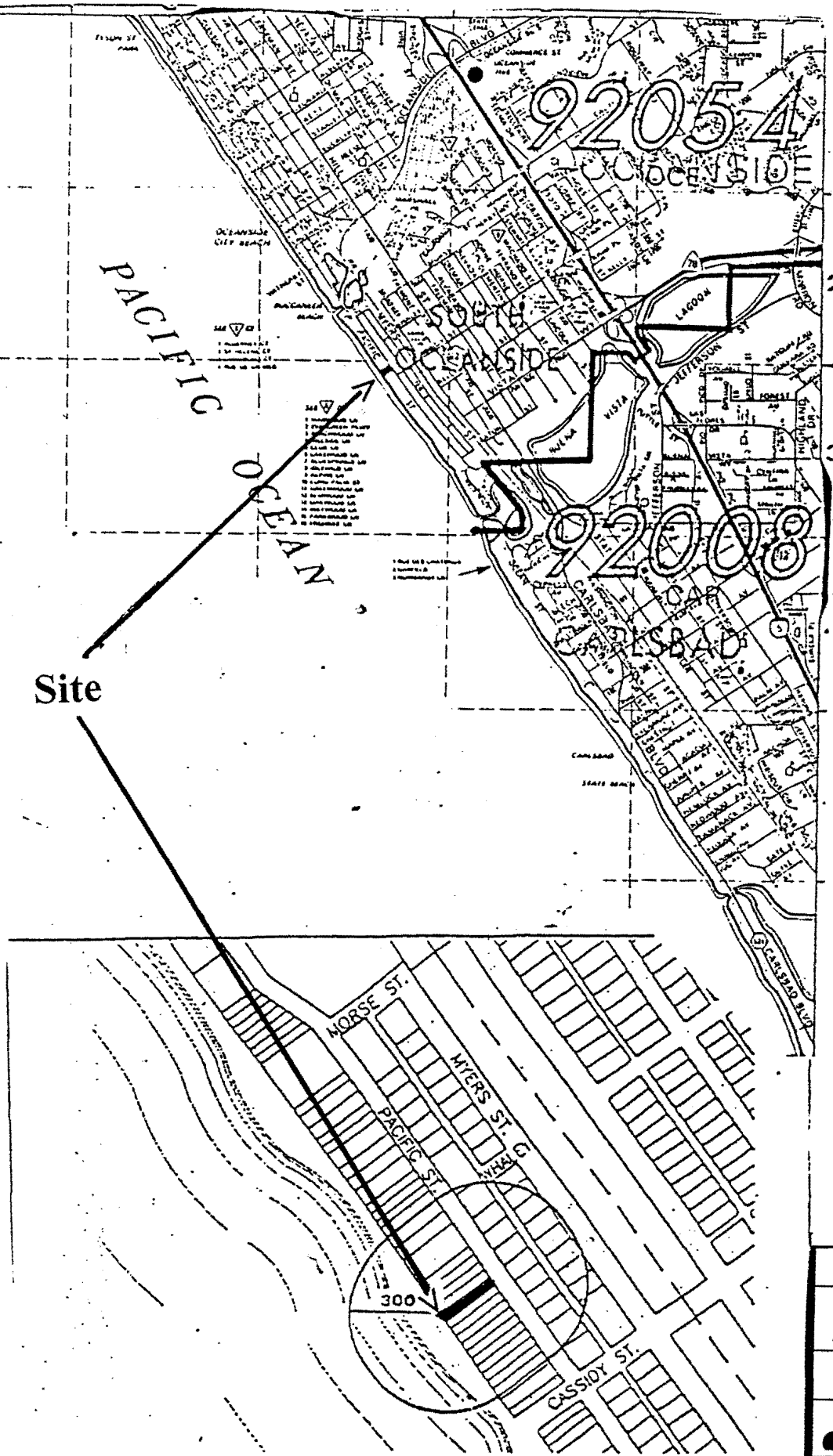
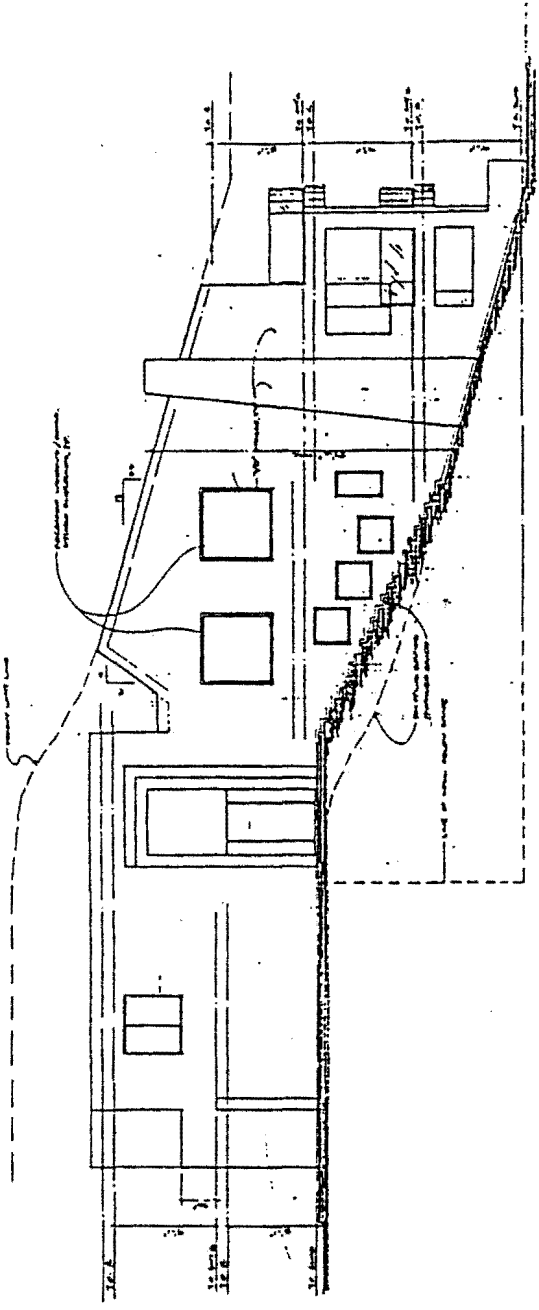


EXHIBIT NO. 1
APPLICATION NO. A-6-OCN-99-20
Location Map
California Coastal Commission

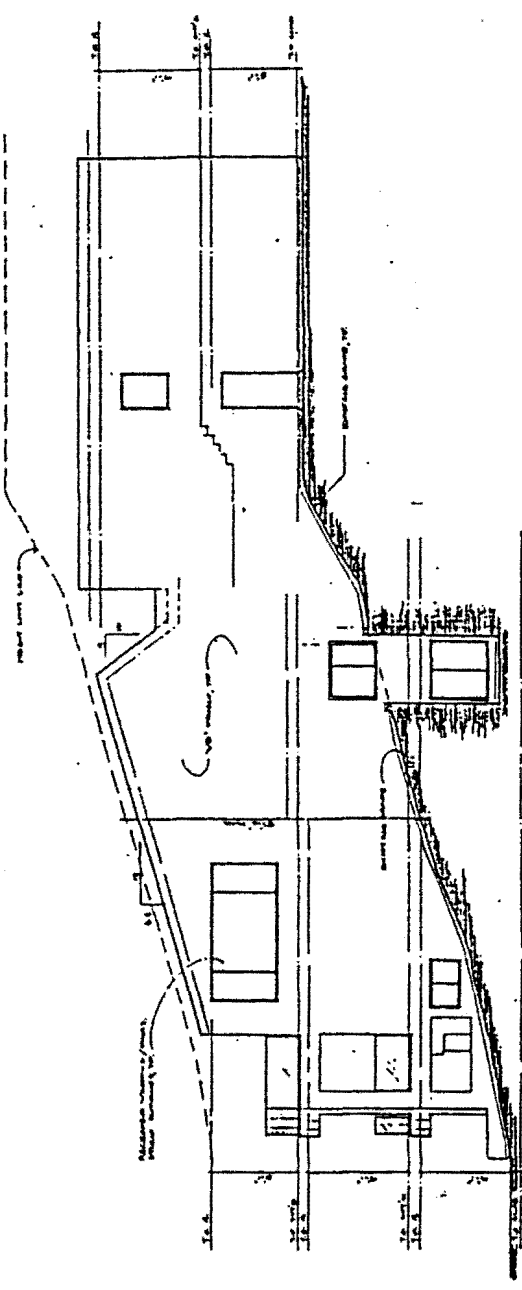
JOHN P. JENSEN ARCHITECT
1719 SOUTH PACIFIC ST.
OCEANVIEW, CA

WILT RESIDENCE
1719 SOUTH PACIFIC ST.
OCEANVIEW, CA


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NORTH ELEVATION



SOUTH ELEVATION

EXHIBIT NO. 3
APPLICATION NO.
A-6-OCN-99-20
Elevations
 California Coastal Commission

Stringline

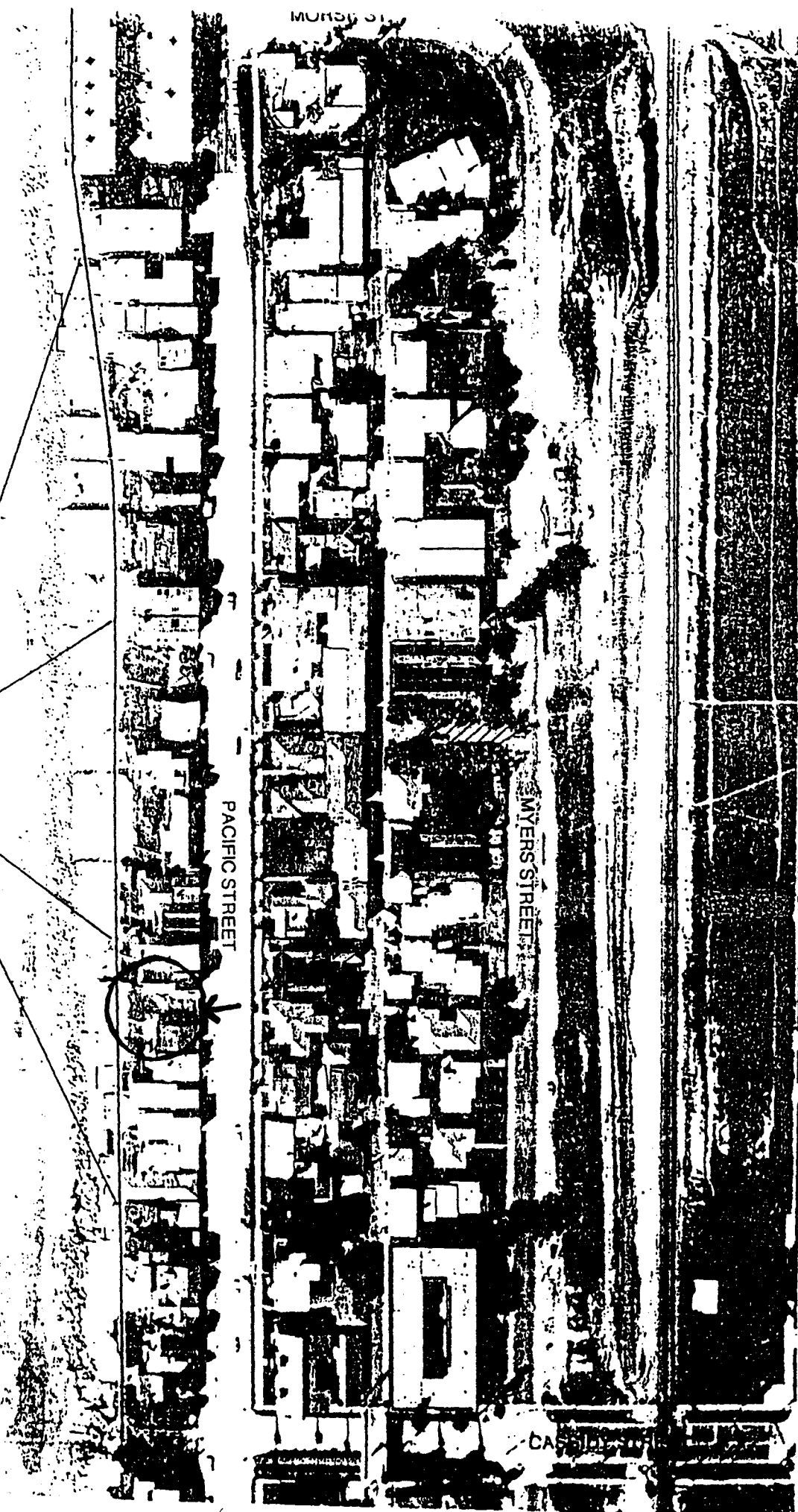
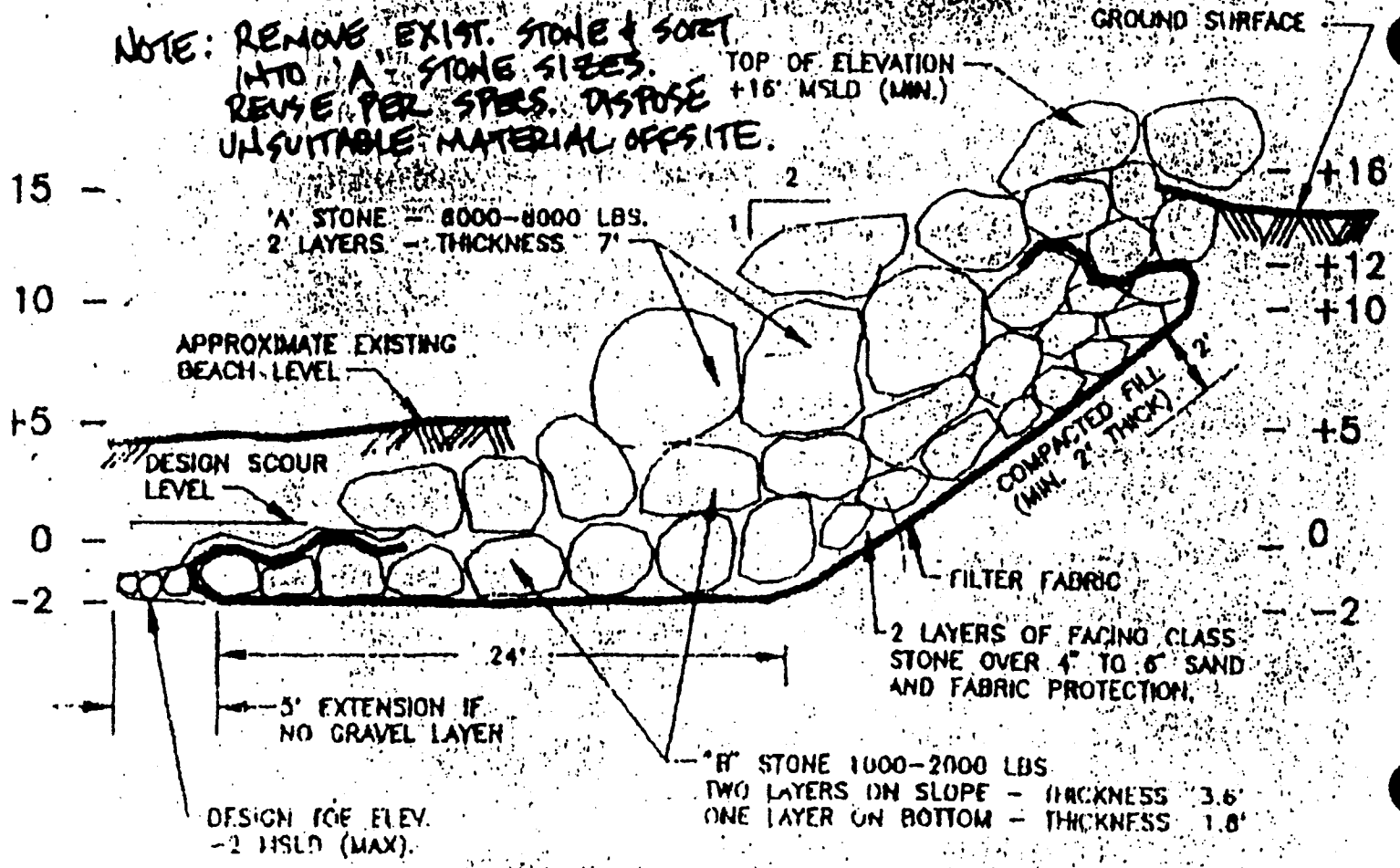


EXHIBIT NO. 4
APPLICATION NO.
A-6-OCN-99
Certified Stringline Map
California Coastal Commission

NOTE: REMOVE EXIST. STONE & SORT INTO 1/2" STONE SIZES. REUSE PER SPECS. DISPOSE UNSUITABLE MATERIAL OFFSITE.



SEAWALL DETAIL PER M-19

6

NOTE: ALL SEAWALLS SHALL BE CONSTRUCTED TO THIS DETAIL UNLESS OTHERWISE APPROVED BY A WAVE ACTION STUDY APPROVED BY THE CITY ENGINEER.

EXHIBIT NO. 6
APPLICATION NO. A-6-OCN-99-2
City of Oceanside Seawall Detail
California Coastal Commission

Executive Director incorporating all of the above terms of this condition. The deed restriction shall include a legal description of the applicant's entire parcel. 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 material amendment to this coastal development permit approved by the Commission or an immaterial amendment approved by the Executive Director.

6. 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 erosion and bluff collapse, and the applicant assumes the liability from such hazards; and (b) the applicant unconditionally waives any claim of liability on the part of the Commission or its successors in interest for damage from such hazards and agrees to indemnify and hold harmless the Commission, its officers, agents, and employees relative to the Commission's approval of the project for any damage due to natural hazards. The document shall run with the land, binding all successors and assigns, and shall be recorded free of prior liens that the Executive Director determines may affect the enforceability of the restriction. This deed restriction shall not be removed or changed without a Coastal Commission-approved amendment to this coastal development permit unless the Executive Director determines that no amendment is required.

7. Other Permits. PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicant shall submit copies of all other required local, state or federal discretionary permits for the development herein approved. Any mitigation measures or other changes to the project required through said permits shall be reported to the Executive Director and shall become part of the project. Such modifications, if any, may require an amendment to this permit or a separate coastal development permit.

8. Future Maintenance/Debris Removal. Within 15 days of completion of construction of the protective device(s) the permittees shall remove all debris deposited on the beach or in the water as a result of construction of the shoreline protective device(s). The permittees shall also be responsible for the removal of debris resulting from failure or damage or damage of the shoreline protective devices(s) in the future. In addition, the permittee shall maintain the permitted seawall, shotcrete wall and chain-link mesh in its approved state except to the extent necessary to comply with the requirements set forth below. Maintenance of the seawall shall include maintaining the color, texture and integrity. Any change in the design of the project or future additions/reinforcement of the seawall beyond minor regrouting or other exempt maintenance, as defined by Section 13252 of the California Code of Regulations, will require a coastal development permit. However, in all cases after inspection, if it is apparent that repair and maintenance is necessary, the permittee shall contact the Commission office to determine whether permits are necessary.

9. As-Built Plans. WITHIN 60 DAYS FOLLOWING COMPLETION OF THE PROJECT, the permittee shall submit as-built plans of the approved seawall and

