

**CALIFORNIA COASTAL COMMISSION**

1000 SOUTH CENTRAL COAST AREA  
1000 SOUTH CALIFORNIA ST., SUITE 200  
VENTURA, CA 93001  
(805) 641-0142

**RECORD PACKET COPY**

Filed: 1/12/00  
49th Day: 3/1/00  
180th Day: 7/10/00  
Staff: J. Johnson  
Staff Report: 1/27/00  
Hearing Date: 2/17/00  
Commission Action:

**STAFF REPORT: REGULAR CALENDAR****APPLICATION NO:** 4-99-222**APPLICANT:** E M Properties, LLC**AGENT:** A. Thomas Torres, AIA**PROJECT LOCATION:** 6982 Wildlife Road, City of Malibu, Los Angeles County

**PROJECT DESCRIPTION:** Demolish single family residence and construct two story 6,873 sq. ft. single family residence, basement, two car garage, 309 sq. ft. cabana, pool, septic system and grade 384 cubic yards of cut and fill balanced on the blufftop lot.

Lot area:	44,000 sq. ft.
Building coverage:	4,063 sq. ft.
Pavement coverage:	7,576 sq. ft.
Landscape coverage:	11,296 sq. ft.
Parking spaces:	4
Height above ext. grade:	24 ft.

**SUMMARY OF STAFF RECOMMENDATION**

Staff recommends approval of the proposed project subject to five (5) special conditions relating to: no future bluff or shoreline protective device; assumption of risk, waiver of liability, and indemnity; plans conforming to geologic recommendation; landscaping, erosion control, and fuel modification plans; and a future development deed restriction to bring the proposed project into conformance with the Coastal Act. The project site, located on a bluff top lot in the Point Dume area at the end of Wildlife Road, will not affect public access to or along the coast. The proposed development would be located 42 feet landward of the top of the bluff edge and would not include any structural improvements on the bluff face or the beach area at the base of the bluff.

**LOCAL APPROVALS RECEIVED:** City of Malibu Approval In-Concept; City of Malibu Environmental Health Department In-Concept Approval; County of Los Angeles Fire Department, Coastal Commission Approval Only.

**SUBSTANTIVE FILE DOCUMENTS:** Supplemental Engineering Geologic Report dated December 21, 1999, Supplement Engineering Report, dated November 7, 1999, and Report of Preliminary Engineering Geologic Investigation, dated December 7, 1998, all by Pacific Geology Consultants, Inc; Reply to Geology and Geotechnical Engineering Review Sheet, dated February 19, 1999 and Geotechnical Engineering Investigation Report dated December 28, 1998 all by Coastline Geotechnical Consultants, Inc.

**STAFF RECOMMENDATION:**

**MOTION:** *I move that the Commission approve Coastal Development Permit No. 4-99-222 pursuant to the staff recommendation.*

**STAFF RECOMMENDATION OF APPROVAL:**

Staff recommends a **YES** vote. Passage of this motion will result in approval of the permit as conditioned and adoption of the following resolution and findings. The motion passes only by affirmative vote of a majority of the Commissioners present.

**I. RESOLUTION TO APPROVE THE PERMIT:**

The Commission hereby approves a coastal development permit for the proposed development and adopts the findings set forth below on grounds that the development as conditioned will be in conformity with the policies of Chapter 3 of the Coastal Act and 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. Approval of the permit complies with the California Environmental Quality Act because either 1) feasible mitigation measures and/or alternatives have been incorporated to substantially lessen any significant adverse effects of the development on the environment, or 2) there are no further feasible mitigation measures or alternatives that would substantially lessen any significant adverse impacts of the development on the environment.

**II. Standard Conditions.**

**1. Notice of Receipt and Acknowledgment.** The permit is not valid and development shall not commence until a copy of the permit, signed by the permittee or

authorized agent, acknowledging receipt of the permit and acceptance of the terms and conditions, is returned to the Commission office.

2. **Expiration.** If development has not commenced, the permit will expire two years from the date 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.

### **III. Special Conditions**

#### **1. No Future Bluff or Shoreline Protective Device**

A. By acceptance of the permit, the applicant agrees, on behalf of itself and all successors and assignees, that no bluff or shoreline protective devices(s) shall ever be constructed to protect the development approved pursuant to Coastal Development Permit 4-99-222 including, but not limited to, the construction of the residence, garage, cabana, pool, foundations, patios, driveways, septic system and any other future improvements in the event that the development is threatened with damage or destruction from waves, erosion, storm conditions, bluff retreat, landslides, or other natural hazards in the future. By acceptance of this permit, the applicant hereby waives, on behalf of itself and all successors and assigns, any rights to construct such devices that may exist under Public Resources Code Section 30235.

B. By acceptance of this permit, the applicant further agrees, on behalf of itself and all successors and assigns, that the landowner shall remove the development

authorized by this permit, including but not limited to, the residence, garage, cabana, foundations, patios, driveways, septic system, if any government agency has ordered that the structures are not to be occupied due to any of the hazards identified above. In the event that portions of the development fall to the beach before they are removed, the landowner shall remove all recoverable debris associated with the development from the beach and ocean and lawfully dispose of the material in an approved disposal site. Such removal shall require a coastal development permit.

- C. PRIOR TO THE ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicant shall execute and record a deed restriction, in a form and content acceptable to the Executive Director which reflects the above restrictions on development. The deed restriction shall include a legal description of the applicant's entire parcel(s). 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 Commission amendment to this coastal development permit.

**2. ASSUMPTION OF RISK, WAIVER OF LIABILITY AND INDEMNITY**

- A. By acceptance of this permit, the applicant acknowledges and agrees to the following:

- (1) The applicant acknowledges and agrees that the site may be subject to hazards from storm waves, tsunami, erosion, bluff failure, landslide, flooding, and wildfire.
- (2) The applicant acknowledges and agrees to assume the risks to the applicant and the property that is the subject of this permit of injury and damage from such hazards in connection with this permitted development.
- (3) The applicant unconditionally waives any claim of damage or liability against the Commission, its officers, agents, and employees for injury or damage from such hazards.
- (4) The applicant agrees to indemnify and hold harmless the Commission, its officers, agents, and employees with respect to the Commission's approval of the project against any and all liability, claims, demands, damages, costs (including costs and fees incurred in defense of such claims), expenses, and amounts paid in settlement arising from any injury or damage due to such hazards.

- B. 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 incorporating all of the above terms of this

condition. 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 Commission amendment to this coastal development permit.

### **3. PLANS CONFORMING TO GEOLOGIC RECOMMENDATION**

PRIOR TO THE ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicant shall submit, for the review and approval by the Executive Director, evidence of the Engineering Geologist and Engineer consultant's review and approval of all project plans. All recommendations contained in the submitted geologic reports titled: Supplemental Engineering Geologic Report, dated December 21, 1999, Supplement Engineering Report, dated November 7, 1999, and Report of Preliminary Engineering Geologic Investigation, dated December 7, 1998, all by Pacific Geology Consultants, Inc; Reply to Geology and Geotechnical Engineering Review Sheet, dated February 19, 1999, and Geotechnical Engineering Investigation Report, dated December 28, 1998, all by Coastline Geotechnical Consultants, Inc. shall be incorporated into all final design and construction including footings, piles, retaining walls, backdrains and subdrains, temporary excavated slopes, drainage, floor slabs-on-grade, grading, foundation support, swimming pool, excavation characteristics, on-site effluent disposal, erosion control. All plans must be reviewed and approved by the consultants.

The final plans approved by the consultants shall be in substantial conformance with the plans approved by the Commission relative to construction, grading and drainage. Any substantial changes in the proposed development approved by the Commission which may be required by the consultants shall require an amendment to the permit or a new coastal permit.

### **4. LANDSCAPE, EROSION CONTROL, AND FUEL MODIFICATION PLANS**

PRIOR TO THE ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicant shall submit final landscaping plan, prepared by a licensed landscape architect or a qualified resource specialist and an erosion control/drainage plan prepared by a licensed engineer for review and approval by the Executive Director. The final landscaping and erosion control/drainage plans shall be reviewed and approved by the consulting engineering geologist to ensure that the plans are in conformance with the consultants' recommendations. The final plans shall incorporate the following criteria:

#### **A) Landscaping, Erosion Control, and Fuel Modification Plans**

- 1) All graded & disturbed areas and the existing graded building pad areas on the subject site shall be planted and maintained for erosion control purposes within (60) days of receipt of the certificate of occupancy for the residence. To minimize the

need for irrigation all landscaping shall consist primarily of native/drought resistant plants as listed by the California Native Plant Society, Santa Monica Mountains Chapter, in their document entitled Recommended List of Plants for Landscaping in the Santa Monica Mountains, dated October 4, 1994. Invasive, non-indigenous plant species which tend to supplant native species shall not be used. The landscape plan shall include the revegetation of those portions of the bluff face that include non-native plant species, primarily ice-plant, with native species appropriate for bluff faces along the coast of the Santa Monica Mountains. The Plan shall identify the native plant species proposed for the blufftop lawn. In addition, a limited irrigation system utilizing drip and/or a very low flow irrigation system may be installed for the long term in the area seaward of the proposed residence.

- 2) All cut and fill slopes and the existing graded building pad areas on the subject site shall be stabilized with planting at the completion of final grading. Planting should be of native plant species indigenous to the Santa Monica Mountains using accepted planting procedures, consistent with fire safety requirements. Such planting shall be adequate to provide 90 percent coverage within two (2) years, and this requirement shall apply to all disturbed soils;
- 3) Plantings will be maintained in good growing condition throughout the life of the project and, whenever necessary, shall be replaced with new plant materials to ensure continued compliance with applicable landscape requirements;
- 4) The Permittee shall undertake development in accordance with the final approved plan. Any proposed changes to the approved final plan shall be reported to the Executive Director. No changes to the approved final plan shall occur without a Coastal Commission - approved amendment to the coastal development permit, unless the Executive Director determines that no amendment is required.
- 5) Vegetation within 20 feet of the proposed residence, garage, and cabana may be removed to mineral earth, vegetation within a 200 foot radius of the main structure may be selectively thinned in order to reduce fire hazard. However, such thinning shall only occur in accordance with an approved long-term fuel modification plan submitted pursuant to this special condition. The final fuel modification plan shall include details regarding the types, sizes and location of plant materials to be removed, and how often thinning is to occur. In addition, the applicant shall submit evidence that the final fuel modification plan, as revised, has been reviewed and approved by the Los Angeles County Fire Department, Forestry Division, Fire Prevention Bureau. Any irrigated lawn, turf and ground cover planted within the fifty foot radius of the proposed house shall be selected from the most drought tolerant species or subspecies, or varieties suited to the Mediterranean climate of the Santa Monica Mountains.
- 6) The erosion control/drainage plan shall assure that run-off from the roofs, patios, and all other impervious surfaces on the subject parcel are collected and discharged

in a non-erosive manner landward to Wildlife Road to avoid ponding on the pad area. For those areas on the site that cannot be discharged landward, the existing bluff top drain may be used to discharge drainage through the existing drain pipe to the base of the bluff. Site drainage shall not be accomplished by sheetflow runoff. The final erosion control/drainage plan shall be implemented within 30 days of completion of final grading. By acceptance of this permit, the applicant agrees to maintain the drainage devices on a yearly basis in order to ensure that the system functions properly. With acceptance of this permit, the applicant agrees that should the project's drainage structures fail or result in erosion of the bluff, the applicant/landowner or successor interests shall be responsible for any necessary repairs and restoration.

**B) Interim Erosion Control Plan**

- 1) The plan shall delineate the areas to be disturbed by grading or construction activities and shall include any temporary access roads, staging areas and stockpile areas. The natural areas on the site shall be clearly delineated on the project site with fencing or survey flags.
- 2) The plan shall specify that should grading take place during the rainy season (November 1 – March 31) the applicant shall install or construct temporary sediment basins (including debris basins, desilting basins or silt traps), temporary drains and swales, sand bag barriers, silt fencing, stabilize any stockpiled fill with geo-fabric covers or other appropriate cover, install geo-textiles or mats on all cut or fill slopes and close and stabilize open trenches as soon as possible. These erosion measures shall be required on the project site prior to or concurrent with the initial grading operations and maintained through out the development process to minimize erosion and sediment from runoff waters during construction. All sediment should be retained on-site unless removed to an appropriate approved dumping location either outside the coastal zone or to a site within the coastal zone permitted to receive fill.
- 3) The plan shall also include temporary erosion control measures should grading or site preparation cease for a period of more than 30 days, including but not limited to: stabilization of all stockpiled fill, access roads, disturbed soils and cut and fill slopes with geo-textiles and/or mats, sand bag barriers, silt fencing; temporary drains and swales and sediment basins. The plans shall also specify that all disturbed areas shall be seeded with native grass species and include the technical specifications for seeding the disturbed areas. These temporary erosion control measures shall be monitored and maintained until grading or construction operations resume.

**C) Monitoring**

Five years from the date of the receipt of the Certificate of Occupancy for the residence the applicant shall submit for the review and approval of the Executive Director, a landscape monitoring report, prepared by a licensed Landscape Architect or qualified Resource Specialist, that certifies the on-site landscaping is in conformance with the landscape plan approved pursuant to this Special Condition. The monitoring report shall include photographic documentation of plant species and plant coverage.

If the landscape monitoring report indicates the landscaping is not in conformance with or has failed to meet the performance standards specified in the landscaping plan approved pursuant to this permit, the applicant, or successors in interest, shall submit a revised or supplemental landscape plan for the review and approval of the Executive Director. The revised landscaping plan must be prepared by a licensed Landscape Architect or a qualified Resource Specialist and shall specify measures to remediate those portions of the original plan that have failed or are not in conformance with the original approved plan.

**5. FUTURE DEVELOPMENT DEED RESTRICTION**

- A.** This permit is only for the development described in Coastal Development Permit No. 4-99-222. Pursuant to Title 14 California Code of Regulations Section 13250(b)(6), the exemptions otherwise provided in Public Resources Code Section 30610 (a) shall apply to the entire property. Accordingly, any future improvements to the entire property including the permitted residence, garage and cabana, and clearing of vegetation or grading, other than as provided for in the approved fuel modification landscape and erosion control plan prepared pursuant to Special Condition Number Four (4), shall require an amendment to Permit No. 4-99-222 from the Commission or shall require an additional coastal development permit from the Commission or from the applicable certified local government.
- B. 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 reflects the above restrictions on development. The deed restriction shall include legal descriptions 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 Commission amendment to this coastal development permit.



#### IV. Findings and Declarations

The Commission hereby finds and declares:

##### A. Project Description and Background.

The applicant is proposing to demolish a 2,397 sq. ft. single family residence and garage to construct a two story 6,873 sq. ft. single family residence including a 300 sq. ft. basement and two car garage in addition to a 307 sq. ft. cabana, pool, septic system and grade 384 cubic yards of cut and fill balanced on site. The applicant also proposes to landscape the bluff top property. The proposed project site is located on Wildlife Road in the Point Dume area of the City of Malibu (Exhibits 1 - 10). The property consists of a relatively flat bluff-top, steep bluff face and sandy beach parcel. The proposed development does not include the addition of any structural improvements on the bluff face or the area at the base of the bluff.

##### B. Blufftop Development/Geologic Stability and Hazards

Section 30253 of the Coastal Act states in part that 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.***

Section 30253 of the Coastal Act requires that new development minimize risk to life and property in areas of high geologic, flood and fire hazard, and assure stability and structural integrity.

Coastal bluffs, such as this one are unique geomorphic features that are characteristically unstable. By nature, coastal bluffs are subject to erosion from sheet flow across the top of the bluff, wind driven rainfall, chemical erosion, including salt spray, causing oxidation and hydration, groundwater seepage, and direct wave attack at the base of the bluff. Stable bluffs usually attain an angle of repose at about a 45 degree slope.

Due to the geologic instability of bluffs and their continuing role in the ecosystem, the certified Los Angeles County Malibu/Santa Monica Mountains Land Use Plan (LUP) contains a number of policies regarding development on or near coastal bluffs. Although the City of Malibu is now incorporated, these policies are still used as

guidance by the Commission in order to determine the consistency of a project with Section 30253 of the Coastal Act.

As noted above, Section 30253 of the Coastal Act mandates that new development provide for geologic stability and integrity and minimize risks to life and property. The LUP policies suggest that geology reports be required for development in unstable areas, and that development minimize both grading, landform alteration and other impacts to natural physical features. Finally, the LUP suggests that new development be set back a minimum of 25 ft. from the top of the bluff or a stringline, whichever distance is greater, but in no case less than would allow for a 75-year useful life for the structure.

The applicant proposes to demolish an existing residence and construct a new residence, attached garage and cabana and pool on the bluff top. The subject bluff face is steep with an average slope ratio of ¼:1 or 70%. There are local near vertical to overhanging conditions present on the bluff face. The proposed residence is setback forty-two (42) feet from the top edge of the bluff; the site is about 90 – 100 feet above mean sea level. The existing residence proposed to be demolished is setback about thirty-eight (38) feet from the top edge of the bluff. The proposed cabana and pool are located more than 160 and 130 feet, respectively from the edge of the bluff top. As a result, the applicant proposes to setback the proposed residence further landward than the existing residence.

### Stringline

As a means of controlling seaward encroachment of residential structures on a blufftop to minimize potential for the construction of shoreline protective devices, adverse effects to coastal processes, and public views, the Commission has, in past permit actions, developed the "stringline" policy. As applied to bluff top development, the stringline limits the seaward extension of a structure to a line drawn between the nearest corners of adjacent structures and limits patios and decks to a similar line drawn between the nearest corners of the adjacent patios and decks. The Commission has applied this policy to numerous past permits involving infill on bluff top lots and has found it to be an effective policy tool in preventing further encroachments seaward to the edge of the bluff.

In the case of this project, the proposed residence will be located approximately 4 feet further landward than the seaward most extent of the adjoining residence to the east and 16 feet further landward than the seaward most extent of the adjoining residence to the west. The proposed cabana and pool will be located substantially landward of the proposed residence. In addition, the proposed patios and decks will also be located landward of the existing patios and decks on the adjoining properties. Further, the Commission notes that the proposed development will be located further landward than the existing development on site proposed for demolition. As a result, the proposed development will be located landward of the appropriate stringline and will not result in

the seaward encroachment of residential development on the subject site. Therefore, the Commission finds that the proposed project will not result in the seaward encroachment of development on the site.

#### Future Shoreline Protective Devices

The applicant has provided four reports titled; Supplemental Engineering Geologic Report dated December 21, 1999, Supplement Engineering Report, dated November 7, 1999, and Report of Preliminary Engineering Geologic Investigation, dated December 7, 1998, all by Pacific Geology Consultants, Inc; Geotechnical Engineering Investigation Report dated December 28, 1998 by Coastline Geotechnical Consultants, Inc., evaluating the geologic stability of the subject site, in relation to the proposed development. The Pacific Geology reports address the stability of the bluff, the new development setback and historic erosion rate of the bluff. This Report dated November 7, 1999 states:

The only nearby applicable data on the rate of sea cliff retreat was determined by Robert M. Norris (1968) along sea cliffs westerly of the Santa Barbara area, approximately fifty miles to the west of the subject site. In general, cliffs along the Santa Barbara coastline are subject to similar marine and climatic processes as the bluff below the subject site.

The Norris (1968) study concluded that under present wave and sea-level conditions, the average rate of cliff retreat in the Santa Barbara area is on the order of fifty feet (50') per century, or about 6 inches per year. **Utilizing this rate for the subject site, one would not expect the bluff to retreat back to the proposed residence for another 84 years, as the residence will be setback forty-two feet (42') from the top of slope. Thus, the residence will be setback beyond the 75-year setback line from the top of the bluff.** (emphasis added)

The toe of the bluff is subject to periodic wave erosion that typically occurs during high tide and storm events. During periods of low to average tides, waves do not reach the toe of the bluff. Further, the bluff area has displayed no evidence of large-scale erosion or geologic instability. Bedding mapped within outcrops along the bluff exhibits northeast to northwest strikes accomplished by dips to the north ranging from 10 to 20 degrees. The declination of mapped bedding plane dip is considered favorable for continued gross bedrock stability of the bluff. **Based on the above favorable geologic conditions, it is the opinion of this office that a shoreline protective device (seawall) will not be required at the toe of the bluff during the life of the structure.** (emphasis added)

Staff requested in letters dated November 15 and November 29, 1999 additional information to specifically identify the historic erosion rate based on site specific evidence over the past 50 years to establish the 75-year setback line from the top of the bluff.

The applicant submitted a Supplemental Engineering Geologic Report dated December 21, 1999 providing more specific evidence of the historic erosion rate over the past 53 years. This Report states:

As requested by the Coastal Commission, a copy of the record of survey recorded in Book 56 Page 29-32 done in 1945 was obtained by the Project Civil Engineer, Peak Surveys, Inc. Peak Surveys plotted the bluff location depicted on the 1945 record of survey onto a topographic map of the site prepared in 1998. Utilizing this site specific data, Peak Surveys concluded **"There has been no definable variance in the bluff location on any of these surveys."** Thus, a review of **past and recent site specific survey data clearly indicates that the proposed location of the residence is well beyond the 75-year setback line.** Even if data in the previously discussed Norris (1968) study on sea-cliff retreat in the Santa Barbara area is utilized, one would not expect the bluff to retreat back to the proposed residence for another 84 years. Thus, the residence will be setback beyond the 75-year setback line from the top of the bluff. (emphasis added)

The applicant has provided evidence that there has been no definable variance in the bluff location (i.e. bluff erosion is minimal) since 1945. Therefore, the location of the proposed project setback from the top of the bluff by 42 feet is beyond the expected 75 year useful life of the new residence, consistent with the guidance provided in the Malibu/Santa Monica Mountains LUP

In the case of the proposed project, the applicant does not propose the construction of any shoreline protective device to protect the proposed development. However areas of Malibu's coast have experienced extreme erosion and scour during severe storm events, such as El Nino storms. It is not possible to completely predict what conditions the proposed residence may be subject to in the future. The Commission notes that the construction of a shoreline protective device on the proposed project site would result in potential adverse effects to coastal processes, shoreline sand supply, and public access.

Interference by shoreline protective devices can result in a number of adverse effects on the dynamic shoreline system and the public's beach ownership interests. First, changes in the shoreline profile, particularly changes in the slope of the profile that results from a reduced beach width, alter the usable area under public ownership. A beach that rests either temporarily or permanently at a steeper angle than under natural conditions will have less horizontal distance between the mean low water and mean high water lines. This reduces the actual area in which the public can pass on their own property. Another effect on access is through a progressive loss of sand as shore material is not available to nourish the bar. The lack of an effective bar can allow such high wave energy on the shoreline that materials may be lost far offshore where it is no longer available to nourish the beach. This effects public access again through a loss of area between the mean high water line and the actual water. Third, shoreline

protective devices such as revetments and seawalls cumulatively affect shoreline sand supply and public access by causing accelerated and increased erosion on adjacent public beaches. This effect may not become clear until such devices are constructed individually along a shoreline and they reach a public beach. Lastly, revetments and seawalls interfere directly with public access by their occupation of beach area that will not only be unavailable during high tide and severe storm events but also potentially throughout the winter season.

The adverse effects of shoreline protective devices are greater the more frequently that they are subject to wave action. In order to minimize adverse effects from shoreline protective devices, when such devices are found to be necessary to protect existing development, the Commission has required applicants to locate such structures as far landward as is feasible. The applicant's engineering geologist consultant has confirmed that no shoreline protective device is required to protect the proposed residence (which will be constructed entirely on an engineered friction pile foundation) setback 42 feet from the top edge of the bluff.

In addition, the Commission notes that Section 30235 of the Coastal Act allows for the construction of a shoreline protective device when necessary to protect existing development or to protect a coastal dependent use. The Commission further notes that the approval of a shoreline protective device to protect new residential development, such as the proposed project, would not be required by Section 30235 of the Coastal Act. The construction of a shoreline protective device to protect a new residential development would conflict with Section 30253 of the Coastal Act which states that new development shall neither create nor contribute to erosion or geologic instability of the project site or surrounding area. In addition, the construction of a shoreline protective device to protect new residential development would also conflict with Section 30251 of the Coastal Act which states that permitted development shall minimize the alteration of natural land forms, including sandy beach areas which would be subject to increased erosion from such a device. To ensure that the proposed project is consistent with Sections 30251 and 30253 of the Coastal Act, and to ensure that the proposed project does not result in future adverse effects to coastal processes, Special Condition Number One (1) requires the applicant to record a deed restriction that would prohibit the applicant, or future land owner, from constructing a shoreline protective device(s) for the purpose of protecting any of the development proposed as part of this application including the residence garage, cabana, pool, foundation, patios, driveways, septic system, etc. Therefore, no future shoreline protective devices will be necessary or allowed to protect the proposed residence in the location proposed by the applicant.

### Hazards

The proposed development would be located along the Malibu coastline, an area that is generally considered to be subject to an unusually high amount of natural hazards. Geologic hazards common to the Malibu coastline include landslides, erosion, and flooding. In addition, fire is an inherent threat to the indigenous chaparral community of

the coastal mountains. Even beachfront properties have been subject to wildfires. Finally, bluff top sites are specifically subject to bluff erosion, landsliding, site flooding and erosion.

The applicant proposes to construct a residence on a friction pile foundation system founded in bedrock. The consultants conclude that the site will be stable and appropriate for the proposed development. The Report of Preliminary Engineering Geologic Investigation dated December 7, 1998 by Pacific Geology Consultants states:

Providing the recommendations contained in this report, in addition to those of the Geotechnical Engineer are followed, the proposed residence, playroom/cabana and swimming pool will be safe from landslide hazard, settlement and slippage. In addition, the proposed construction will not adversely affect off-site properties from a geological standpoint.

The Geotechnical Engineering Investigation Report, dated December 28, 1998, by Coastline Geotechnical Consultants, Inc. states:

Based on the findings summarized in this report, and provided the recommendations of this report are followed, and the designs, grading and construction are properly and adequately executed, it is our opinion that construction within the building site behind the geotechnical setback line would not be subject to geotechnical hazards from landslides, slippage, or excessive settlement. Further, it is our opinion that the proposed building and anticipated site grading would not adversely effect the stability of the site, or adjacent properties, with the same provisos listed above.

Based on the recommendations of the consulting engineering geologist and engineer, the Commission finds that the proposed development will minimize risks from geologic hazards, consistent with Section 30253 of the Coastal Act as long as the consultant's recommendations are incorporated into the project plans.

The applicant's consultants also make recommendations pertaining to drainage on the subject site. The Pacific Geology Report dated December 7, 1998 states the following:

A comprehensive drainage system shall be designed and incorporated into the final plans.

Specific recommendations were incorporated into this report. Uncontrolled runoff over the bluff face will contribute to bluff erosion and lead to destabilization of the bluff slopes and eventually the building site. The Commission finds that the proposed drainage system will serve to minimize hazards associated with erosion, however in order to ensure that the final drainage system is in substantial conformance with the consulting geotechnical engineers recommendations, including those pertaining to drainage, Special Condition Number Four (4) requires the applicant submit final erosion

control/drainage plans certified by the consultants as being in conformance with their recommendations. Therefore, the Commission finds that that the proposed drainage system will serve to minimize hazards associated with site and bluff erosion. In addition, the Commission finds it necessary to require the applicant to submit project plans that have been certified in writing by the consultants as conforming to their recommendations as required by Special Condition Number Three (3).

As discussed above, the Commission notes that the applicant's consultants have indicated that the proposed development will serve to ensure geologic and structural stability on the subject site. However, the Commission also notes that the proposed development is located on a blufftop lot in the City of Malibu and will be subject to some inherent potential hazards. The Commission notes that the Malibu coast has historically been subject to substantial damage as the result of storm and flood occurrences--most recently, and perhaps most dramatically, during the 1998 severe El Nino winter storm season. The subject site is clearly susceptible to storm waves, tsunami, erosion, bluff failure, landslide, flooding and wildfires. Past occurrences have caused property damage resulting in public costs through emergency responses and low-interest, publicly-subsidized reconstruction loans in the millions of dollars in Malibu area alone from last year's storms.

In the winter of 1977-1978, storm-triggered mudslides and landslides caused extensive damage along the Malibu coast. According to the National Research Council, damage to Malibu beaches, seawalls, and other structures during that season caused damages of as much as almost \$5 million to private property alone.

The El Nino storms recorded in 1982-1983 caused high tides of over 7 feet, which were combined with storm waves of up to 15 feet. These storms caused over \$12.8 million to structures in Los Angeles County, many located in Malibu. The severity of the 1982-1983 El Nino storm events are often used to illustrate the extreme storm event potential of the California, and in particular, Malibu coast. The 1998 El Nino storms also resulted in widespread damage to residences, public facilities and infrastructure along the Malibu Coast.

Thus, ample evidence exists that all beachfront development in the Malibu area is subject to an unusually high degree of risk due to storm waves and surges, high surf conditions, erosion, flooding and wildfires. The proposed development will continue to be subject to the high degree of risk posed by the hazards of oceanfront development in the future. The Coastal Act recognizes that development, even as designed and constructed to incorporate all recommendations of the consultants, may still involve the taking of some risk. When development in areas of identified hazards is proposed, the Commission considers the hazard associated with the project site and the potential cost to the public, as well as the individual's right to use the subject property.

The Commission finds that due to the possibility of storm waves, tsunami, erosion, bluff failure, landslide, flooding and wildfire, the applicant shall assume these risks as

conditions of approval. Because this risk of harm cannot be completely eliminated, the Commission requires the applicant to waive any claim of liability against the Commission for damage to life or property which may occur as a result of the permitted development. The applicant's assumption of risk, as required by Special Condition Number Two (2), when executed and recorded on the property deed, will show that the applicant is aware of and appreciates the nature of the hazards which exist on the site, and that may adversely affect the stability or safety of the proposed development.

### Conclusion

Therefore, the Commission finds that the proposed project, as conditioned, is consistent with Coastal Act Sections 30235, 30251, and 30253.

### C. Sensitive Resources.

Section 30240 of the Coastal Act states that:

- (a) Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed within those areas.**
- (b) Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade those areas, and shall be compatible with the continuance of those habitat and recreation areas.**

The Malibu/Santa Monica Mountains Land Use Plan (LUP) policies P68 and P69 address the protection of Environmental Sensitive Habitat Areas (ESHA). In its findings regarding the LUP, the Commission has consistently emphasized the importance placed by the Coastal Act on protecting sensitive environmental resources through Section 30240.

The proposed project site includes a blufftop and a bluff face that descends steeply to beach east of Point Dume State Beach. The steep bluff faces in Malibu, particularly those on Point Dume, contain rare plant communities and have been considered by the Commission as environmentally sensitive habitat areas (ESHA) in past permit actions. The Commission has required that new development provide adequate setbacks from the edge of bluffs both to minimize impacts to ESHAs as well as to minimize risks from geologic hazards.

The proposed development will be located landward of the existing residence proposed to be demolished, at least 42 feet from the top of the bluff. In addition, the applicant proposes to cut about 192 cubic yards of material on site to construct the proposed project and fill the same 192 cubic yards on site for landscaping purposes. The



applicant has submitted a landscaping plan which identifies many new native plants proposed on site and existing non-native ice plant on the upper portion of the west bluff face to be retained. The landscaping plan needs to include the revegetation of this portion of the bluff face with an appropriate plant species native to coastal areas in the vicinity of the Santa Monica Mountains. Special Condition Number Four (4) requires that the applicant submit a revised and final landscaping plan that include a bluff face revegetation plan for those portions of the bluff which include non-native vegetation and identify the native grass species for the blufftop lawn. The revegetation component of the landscape plan shall utilize only drought resistant plants, which are native to the Point Dume coastal bluffs. In addition, a limited irrigation system utilizing drip and/or a very low flow irrigation system may be installed for the long term in the area seaward of the proposed residence. To address the potential for onsite erosion and sedimentation offsite, Special Condition Number Four (4) is also necessary to require a landscape, erosion control, and fuel modification plan. Special Condition Number Four (4) requires the applicant to implement a landscape plan with native plant species to stabilize and vegetate the site. The Commission further notes that the use of non-native and/or invasive plant species for residential landscaping results in both direct and indirect adverse effects to native plants species indigenous to the Malibu/Santa Monica Mountains area. Direct adverse effects from such landscaping result from the direct occupation or displacement of native plant community habitat by new development and associated non-native landscaping. Indirect adverse effects include offsite migration and colonization of native plant species habitat by non-native/invasive plant species (which tend to outcompete native species) adjacent to new development. The Commission notes that the use of exotic plant species for residential landscaping has already resulted in significant adverse effects to native plant communities in the Malibu/Santa Monica Mountains area. Therefore, in order to minimize adverse effects to the indigenous plant communities of the Malibu/Santa Monica Mountains area, Special Condition Number Four (4) also requires that all landscaping consist primarily of native plant species and that invasive plant species shall not be used. Special Condition Number Four (4) also requires a fuel modification plan and an interim erosion control plan to minimize erosion of the site and sedimentation offsite during the construction of the project. Further, a landscape monitoring report is required five years from the date of receipt of the Certificate of Occupancy for the residence.

To ensure that any future additions to the permitted structures, which would otherwise be exempt from permit requirements, are reviewed for consistency with Section 30253 of the Coastal Act, the Commission finds, that it is necessary to require that all future development including additions or improvements to the permitted structures will require a permit or permit amendment, as specified in Special Condition Number Five (5).

The proposed landscape, erosion control, and fuel modification plan including the bluff revegetation will serve to enhance and restore the bluff top and bluff face habitat. Further, as proposed, the new residence will be adequately setback to minimize

impacts to the bluff face ESHA. Therefore, the Commission finds that, as conditioned the proposed project is consistent with Section 30240 of the Coastal Act.

**D. Scenic and Visual Impacts.**

Section 30251 of the Coastal Act states that:

**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. New development in highly scenic areas such as those designated in the California Coastline Preservation and Recreation Plan prepared by the Department of Parks and Recreation and by local government shall be subordinate to the character of its setting.**

The proposed new residence will be located landward of the existing residence to be demolished with a set back of 42 feet from the top edge of the bluff. Further, as discussed above, the proposed development will be consistent with the stringline of development existing on adjacent parcels. Furthermore, the proposed development does not include the addition of any structural improvements on the bluff face or the area at the base of the bluff. While the proposed development includes 384 cu. yds. of grading, the majority of the grading is excavation for the basement level of the residence and the pool and the resulting fill is to be placed on the subject lot for landscaping purposes. As such, there will be no significant landform alteration or visual impact associated with the proposed grading operations. Therefore, there will be no significant visual impacts, as seen from the public beach below, as a result of the proposed development.

Finally, there are no ocean or coastal views from that portion of Wildlife Road, which fronts the subject property; consequently there will be no impact on visual resources, as seen from Wildlife Road either. To ensure that any future additions to the permitted structures, which would otherwise be exempt from permit requirements, are reviewed for consistency with section 30251 of the Coastal Act, the Commission finds that it is necessary to require that all future additions or improvements to the permitted structures will require a permit or permit amendment, as specified in Special Condition Number Five (5).

The Commission finds that as, conditioned above, the proposed development is consistent with section 30251 of the Coastal Act.

**E. Cumulative Impacts.**

Sections 30250 and 30252 of the Coastal Act address the cumulative impacts of new developments. Section 30250 (a) of the Coastal Act states:

- (a) **New residential, commercial, or industrial development, except as otherwise provided in this division, shall be located within, contiguous with, or in close proximity to, existing developed areas able to accommodate it or, where such areas are not able to accommodate it, in other areas with adequate public services and where it will not have significant adverse effects, either individually or cumulatively, on coastal resources. In addition, land divisions, other than leases for agricultural uses, outside existing developed areas shall be permitted only where 50 percent of the usable parcels in the area have been developed and the created parcels would be no smaller than the average size of surrounding parcels.**

Section 30252 of the Coastal Act states:

**The location and amount of new development should maintain and enhance public access to the coast by (1) facilitating the provision or extension of transit service, (2) providing commercial facilities within or adjoining residential development or in other areas that will minimize the use of coastal access roads, (3) providing non-automobile circulation within the development, (4) providing adequate parking facilities or providing substitute means of serving the development with public transportation, (5) assuring the potential for public transit for high intensity uses such as high-rise office buildings, and by (6) assuring that the recreational needs of new residents will not overload nearby coastal recreation areas by correlating the amount of development with local park acquisition and development plans with the provision of onsite recreational facilities to serve the new development.**

New development raises coastal issues related to cumulative impacts on coastal resources. The construction of a second unit on a site where a primary residence is proposed intensifies the use of a parcel by increasing impacts on public services, such as water, sewage, electricity and roads. New development also raises issues as to whether the location and amount of new development maintains and enhances public access to the coast.

Based on these policies, the Commission has limited the development of second dwelling units (including pool cabanas) on residential parcels in the Malibu and Santa Monica Mountain areas. The issue of second units on lots with primary residences has been the subject of past Commission action in the certification of the Santa Monica Mountains/Malibu Land Use Plan (LUP). In its review and action on the Malibu LUP, the Commission found that placing an upper limit on the size of second units (750 sq.

ft.) was necessary given the traffic and infrastructure constraints which exist in Malibu and given the abundance of existing vacant residential lots. Furthermore, in allowing these small units, the Commission found that the small size of units (750 sq. ft.) and the fact that they are likely to be occupied by one or at most two people would cause such units to have less impact on the limited capacity of Pacific Coast Highway and other roads (including infrastructure constraints such as water, sewage, electricity) than an ordinary single family residence. (Certified Malibu Santa Monica Mountains Land Use Plan 1986, page 29 and P.C.H. (ACR), 12/83 page V-1 - VI-1).

The second unit issue has also been raised by the Commission with respect to statewide consistency of both coastal development permits and Local Coastal Programs (LCPs). Statewide, additional dwelling units on single family parcels take on a variety of different forms which in large part consist of: 1) a second unit with kitchen facilities including a granny unit, caretaker's unit, or farm labor unit; and 2) a guesthouse, with or without separate kitchen facilities, such as a pool cabana. Past Commission action has consistently found that both second units and guesthouses inherently have the potential to cumulatively impact coastal resources. Thus, conditions on coastal development permits and standards within LCP's have been required to limit the size and number of such units to ensure consistency with Chapter 3 policies of the Coastal Act in this area (Certified Malibu Santa Monica Mountains Land Use Plan 1986, page 29).

As proposed, the 309 sq. ft. pool cabana with a full bath is consistent with past Commission decisions. However, in order to ensure that no additions are made to the pool cabana without due consideration of the potential cumulative impacts, Special Condition Number Five (5) requires that any future structures, additions, or improvements related to the proposed pool cabana, or other development approved under this permit, including, but not limited to, any expansion of the existing structure, will require a permit or permit amendment. Therefore, the Commission finds that, as conditioned, the proposed development is consistent with Sections 30250 and 30252 of the Coastal Act.

#### **F. Septic System**

The Commission recognizes that the potential build-out of lots in the Santa Monica Mountains, and the resultant installation of septic systems, may contribute to adverse health effects and geologic hazards in the local area. **Section 30231** of the Coastal Act states that:

**The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges and**

entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface water flow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, minimizing alteration of natural streams.

The applicant is proposing the installation of a new 2000 gallon septic tank, and two seepage pits to accommodate the sewage of the proposed development. The applicant has submitted approval from the City of Malibu Environmental Health Department stating that the proposed septic system is in conformance with the minimum requirements of the City of Malibu Uniform Plumbing Code. The City of Malibu's minimum health code standards for septic systems have been found protective of coastal resources and take into consideration the percolation capacity of soils along the coastline, the depth to groundwater, etc. Therefore, the Commission finds that the proposed project is consistent with Section 30231 of the Coastal Act.

**G. Local Coastal Program.**

Section 30604 of the Coastal Act states, in part, that:

**(a) Prior to certification of the local coastal program, a coastal development permit shall be issued if the issuing agency, or the commission on appeal, finds that the proposed development is in conformity with the provisions of Chapter 3 (commencing with Section 30200) of this division and that the permitted development will not prejudice the ability of the local government to prepare a local program that is in conformity with the provisions of Chapter 3 (commencing with Section 30200).**

Section 30604(a) of the Coastal Act provides that the Commission shall issue a Coastal Permit only if the project will not prejudice the ability of the local government having jurisdiction to prepare a Local Coastal Program which conforms with Chapter 3 policies of the Coastal Act. The preceding sections provide findings that the proposed project will be in conformity with the provisions of Chapter 3 if certain conditions are incorporated into the project and accepted by the applicant. As conditioned, the proposed development will not create adverse impacts and is found to be consistent with the applicable policies contained in Chapter 3. Therefore, the Commission finds that approval of the proposed development will not prejudice the City's ability to prepare a Local Coastal Program which is also consistent with the policies of Chapter 3 of the Coastal Act as required by Section 30604(a).

**H. California Environmental Quality Act.**

Section 13096(a) of the Commission's administrative regulations requires Commission approval of a Coastal Development Permit application to be supported by a finding showing the application, as conditioned by any conditions of approval, to be consistent with any applicable requirements of the California Environmental Quality Act (CEQA).

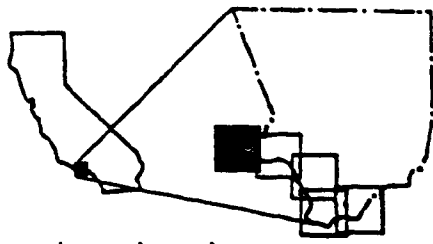
Section 21080.5(d)(2)(A) of CEQA prohibits a proposed development from being approved if there are feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse effect which the activity may have on the environment.

The Commission finds that, the proposed project, as conditioned will not have significant adverse effects on the environment, within the meaning of the California Environmental Quality Act of 1970. Therefore, the proposed project, as conditioned, has been adequately mitigated and is determined to be consistent with CEQA and the policies of the Coastal Act.

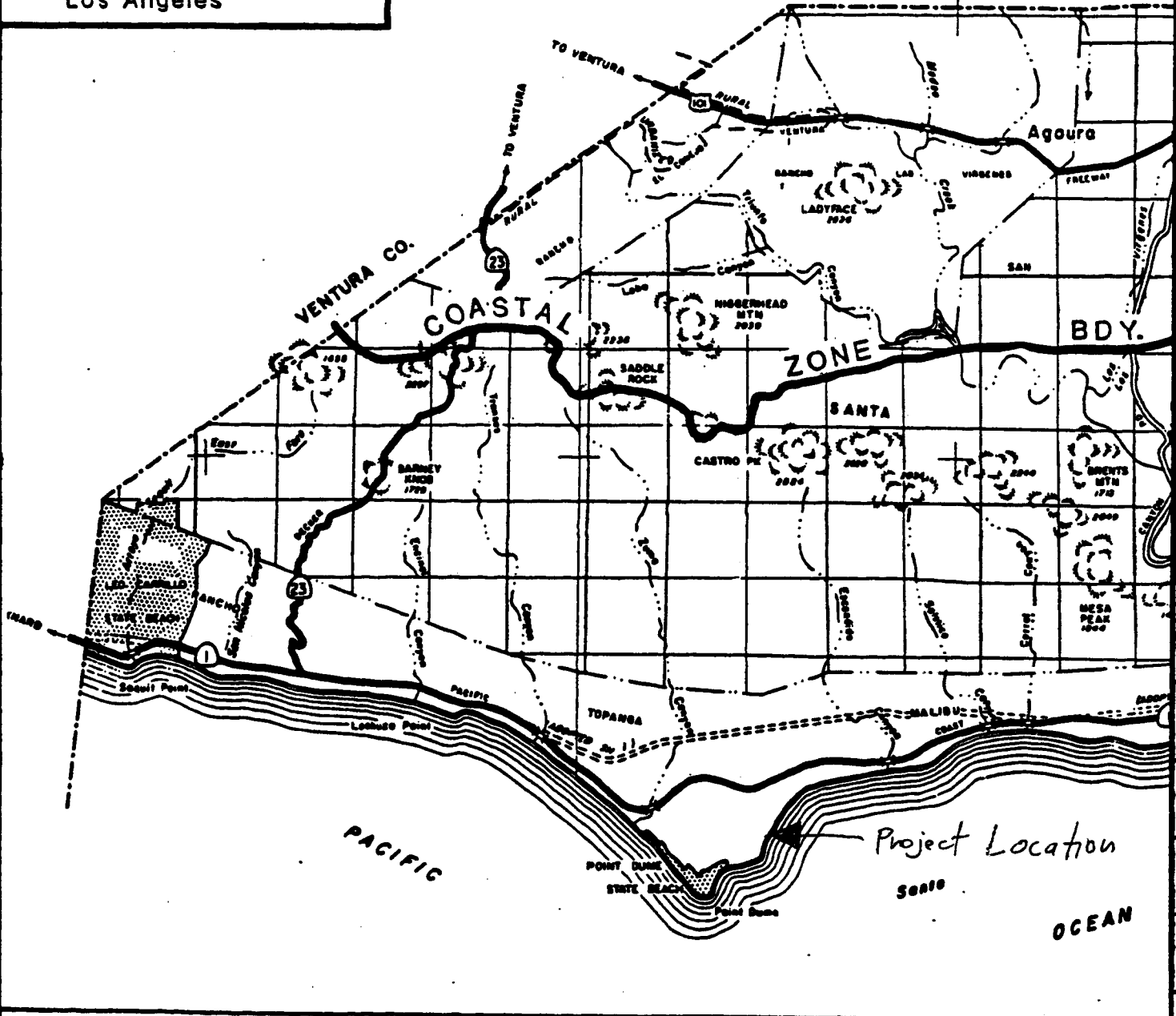
499122empropertiesreport

A B C D E F G H I J K L M N O

EXHIBIT NO. 1
APPLICATION NO. 4-99-222
Project Location



Los Angeles



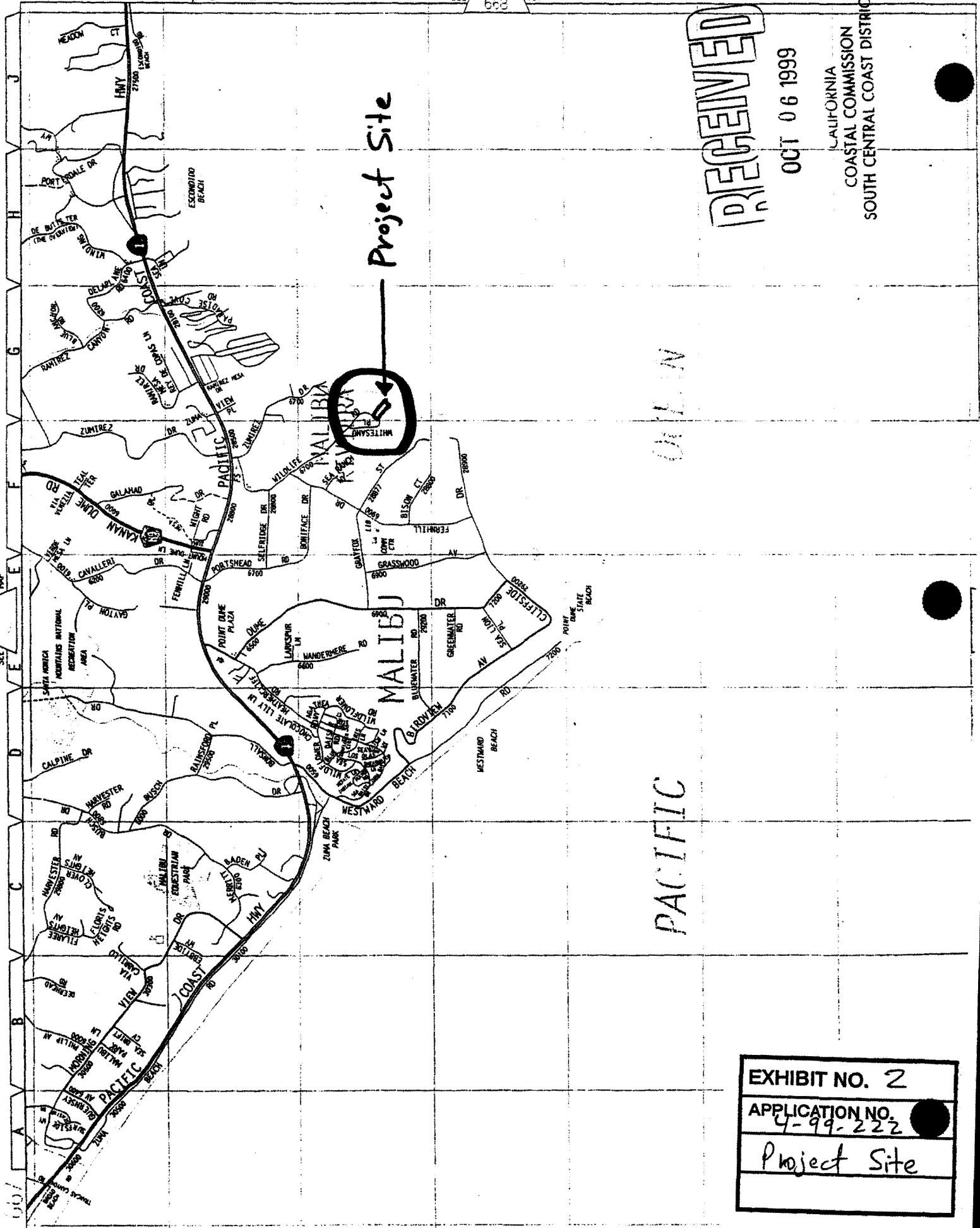
California Coastal Commission

# LOCATION MAP



County of Los Angeles

Sheet 1 of 5



Project Site

RECEIVED

OCT 06 1999

CALIFORNIA  
COASTAL COMMISSION  
SOUTH CENTRAL COAST DISTRICT

UPDOWN

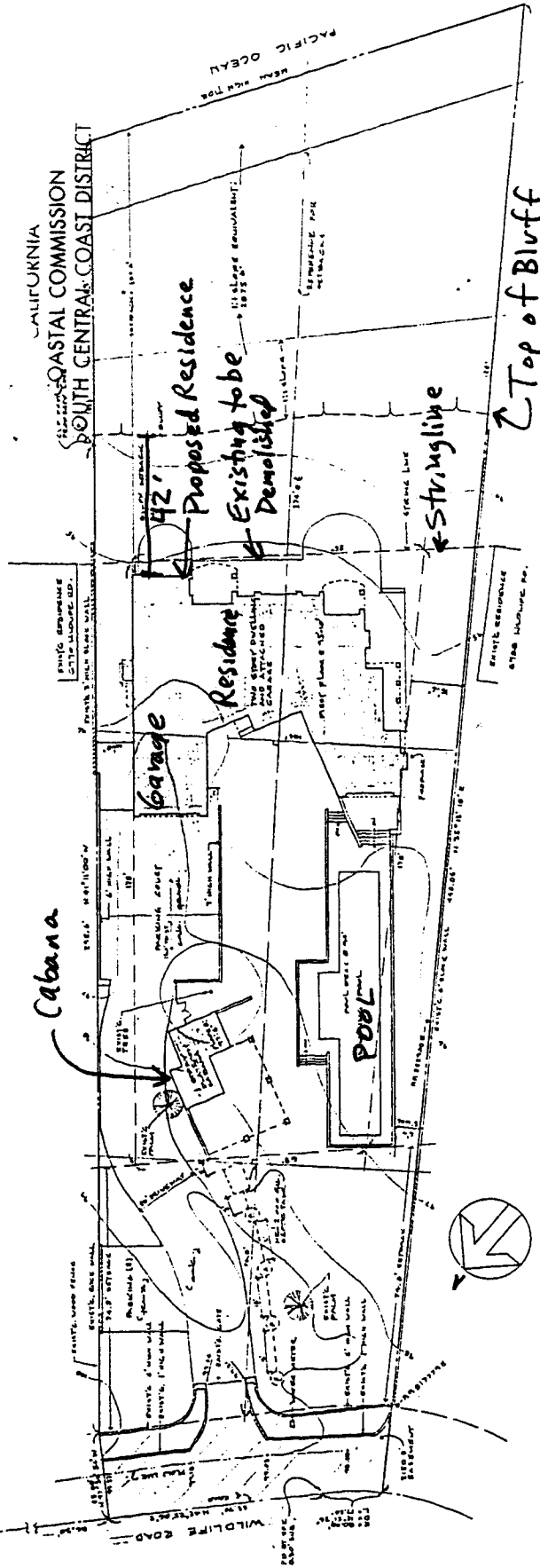
PACIFIC

EXHIBIT NO. 2
APPLICATION NO. 4-99-222
Project Site



RECEIVED

OCT 06 1999



CALIFORNIA  
 COASTAL COMMISSION  
 SOUTH CENTRAL COAST DISTRICT

Proposed Residence  
 Existing to be Demolished

Top of Bluff

ADDRESS:  
 4275 WILDLIFE ROAD  
 MALIBU, CALIFORNIA  
 LEGAL DESCRIPTION:  
 PORTION OF PARCELS (AS SHOWN)  
 1012  
 REFERRED TO IN DEED SURVEY, VOL. 8124 PG. 10

SITE PLAN 1/2" = 1'-0"

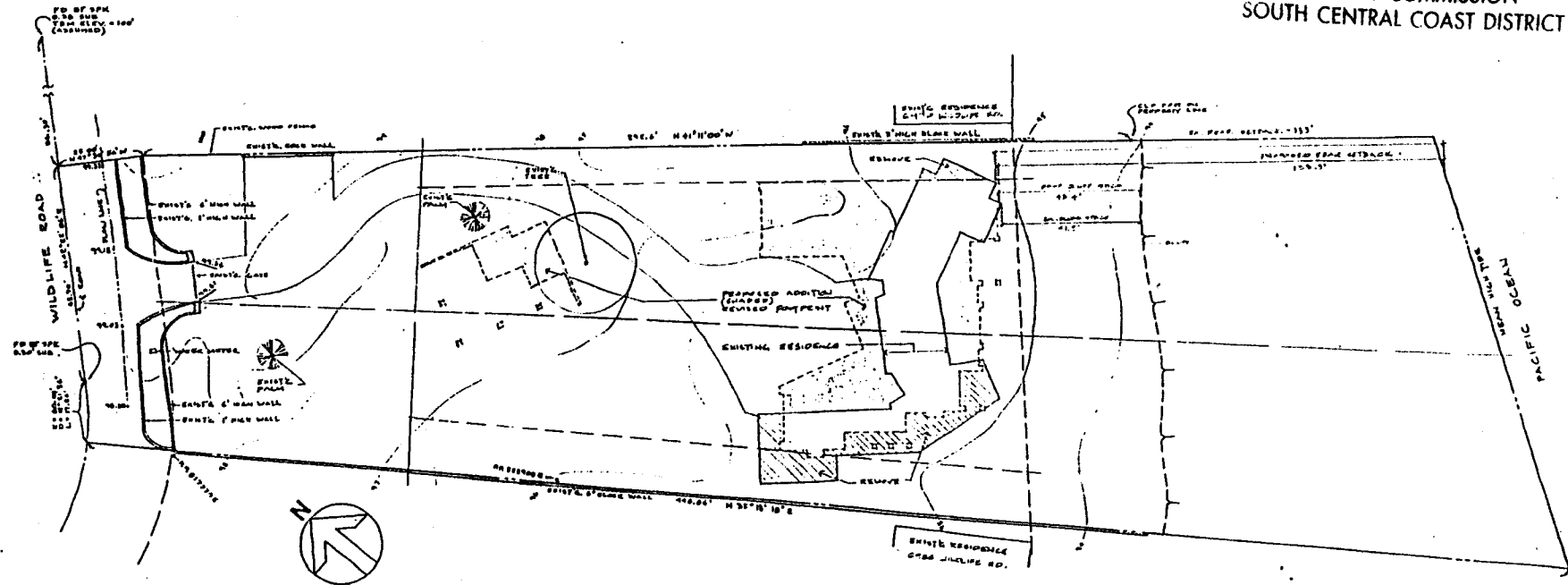
TABLE:  
 SHEET NO. 1 OF 1  
 DATE: 10/1/99  
 DRAWN BY: J. [Name]  
 CHECKED BY: J. [Name]  
 SCALE: 1/2" = 1'-0"  
 PROJECT NO.: 4575  
 SHEET NO.: 1 OF 1  
 DATE: 10/1/99  
 DRAWN BY: J. [Name]  
 CHECKED BY: J. [Name]  
 SCALE: 1/2" = 1'-0"  
 PROJECT NO.: 4575  
 SHEET NO.: 1 OF 1

EXHIBIT NO. 3  
 APPLICATION NO.  
 4-99-222  
 Site Plan

# RECEIVED

OCT 06 1999

CALIFORNIA  
COASTAL COMMISSION  
SOUTH CENTRAL COAST DISTRICT



ADDRESS:  
14711 WILDLIFE ROAD  
MALIBU, CALIFORNIA

LEGAL DESCRIPTION:  
PORTION OF PAGES 21 (25 24/24)

INFORMATION TAKEN FROM SURVEY  
PREPARED BY PEAK SURVEYS, INC. 2/24/99

DEMOLITION PLAN 1/8" = 1'-0"

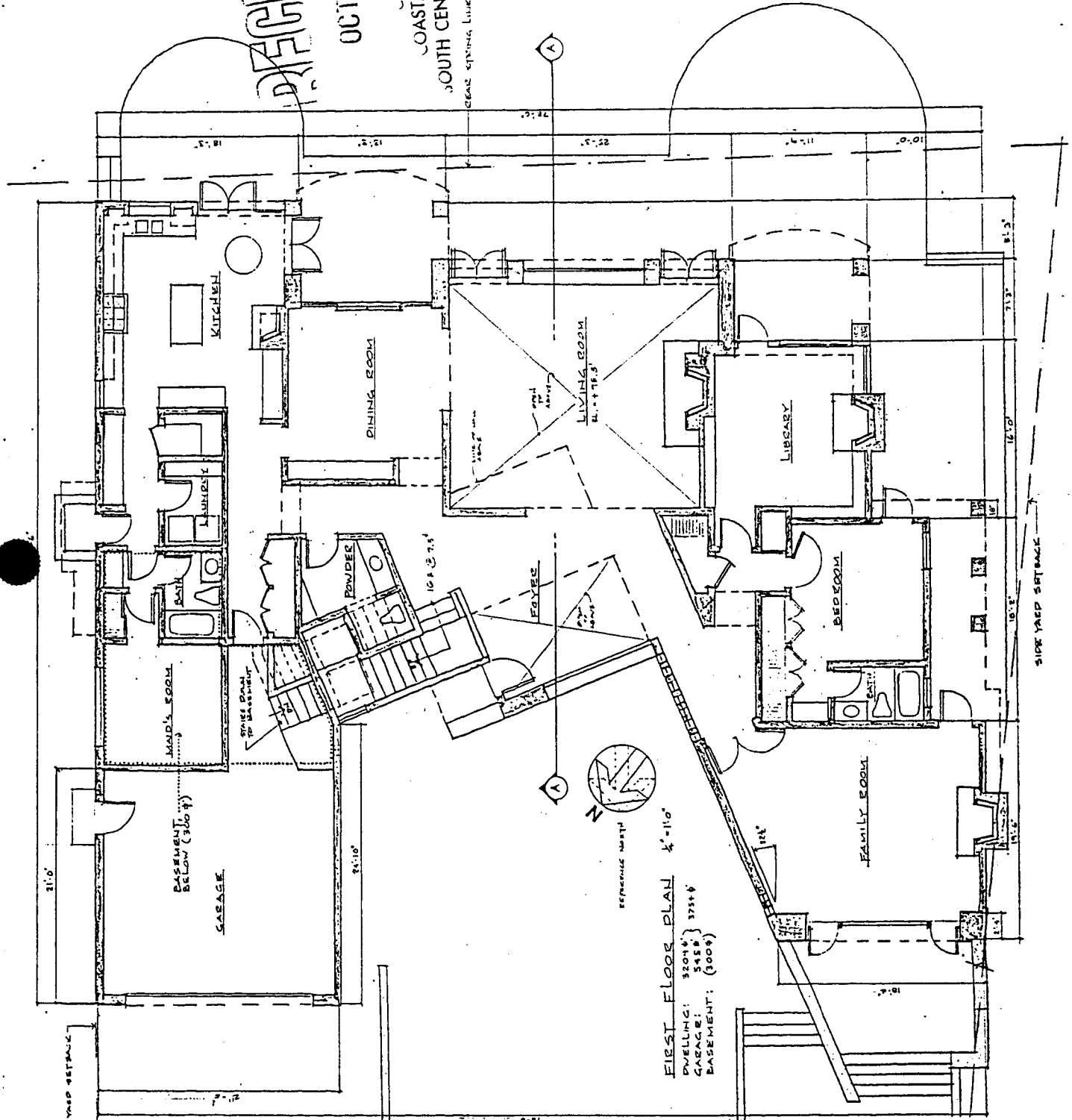
EXHIBIT NO. 4
APPLICATION NO. 99-222
Demolition
Plan

RECEIVED

OCT 06 1999

CALIFORNIA  
COASTAL COMMISSION  
SOUTH CENTRAL COAST DISTRICT  
GEAR SPRING LINK

A-3



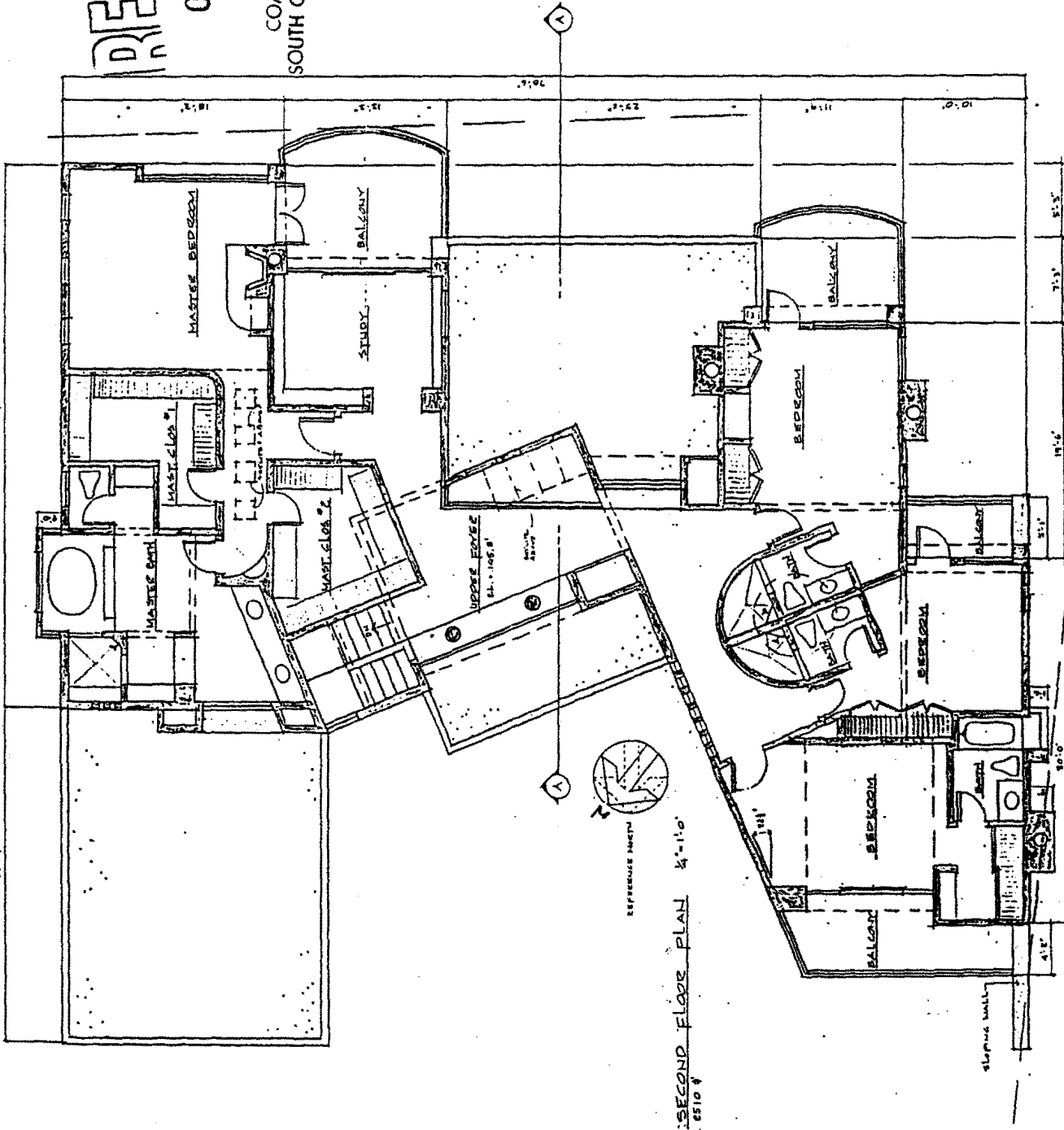
FIRST FLOOR PLAN 4'-11.0"  
 DWELLING: 3204 sq ft  
 GARAGE: 545 sq ft  
 BASEMENT: (300 sq ft)

EXHIBIT NO. 5
APPLICATION NO. 4-99-222
First Floor Plan

RECEIVED

OCT 06 1999

CALIFORNIA  
COASTAL COMMISSION  
SOUTH CENTRAL COAST DISTRICT



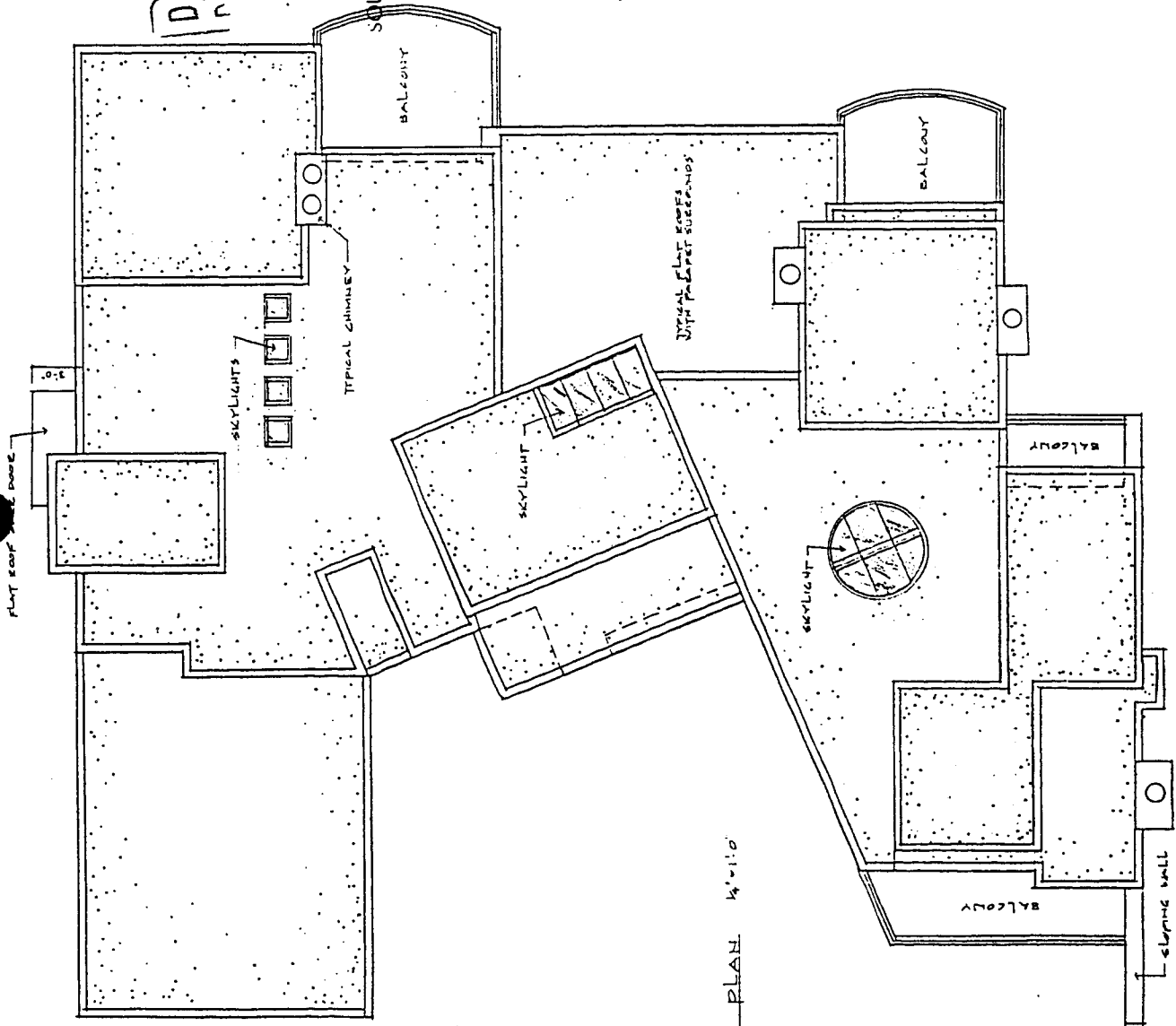
SECOND FLOOR PLAN 4'-11/8"  
6510 4

EXHIBIT NO. 6
APPLICATION NO. 4-99-222
Second Floor Plan

RECEIVED

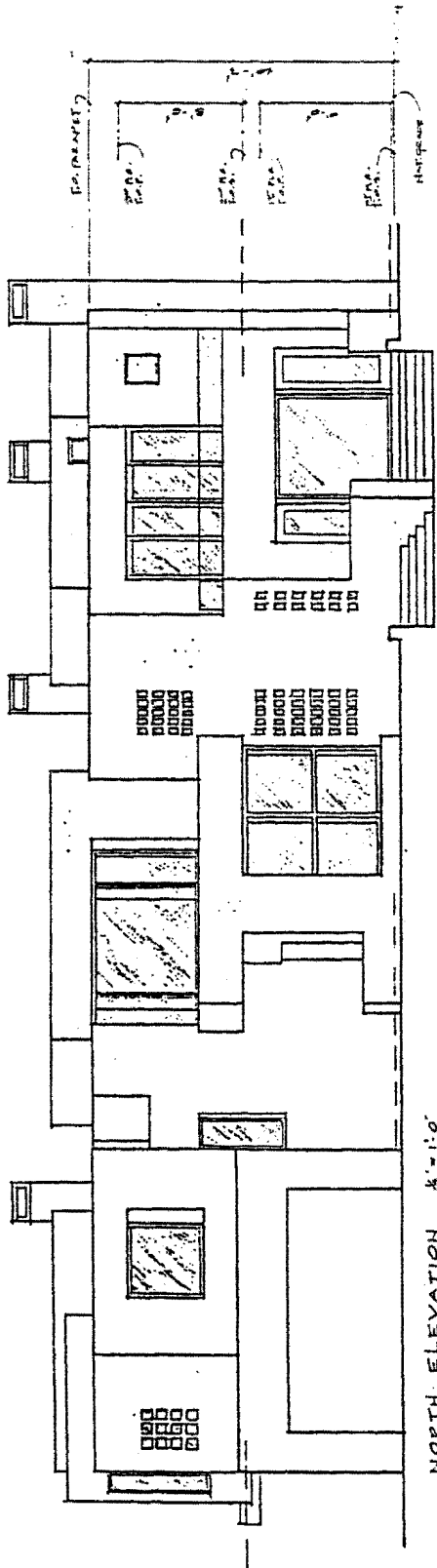
OCT 06 1999

CALIFORNIA  
COASTAL COMMISSION  
SOUTH CENTRAL COAST DISTRICT

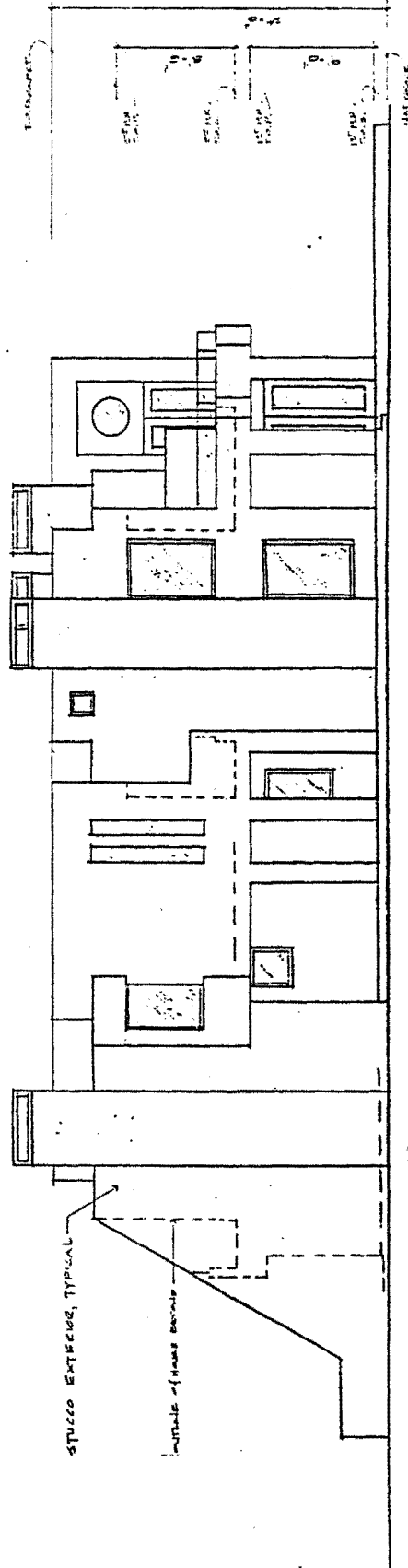


ROOF PLAN 4/11/0

EXHIBIT NO. 7
APPLICATION NO. 9-99-222
Roof Plan



NORTH ELEVATION 1/4" = 1'-0"



WEST ELEVATION 1/4" = 1'-0"

STUCCO EXTREME, TYPICAL

OUTSIDE STUCCO CORNER

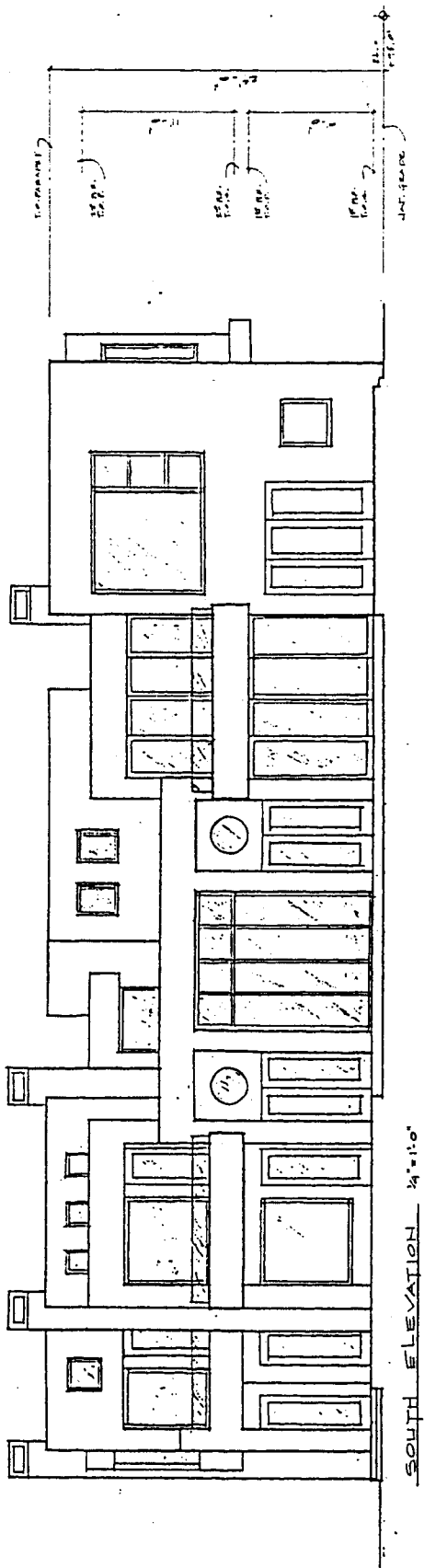
RECEIVED

OCT 06 1999

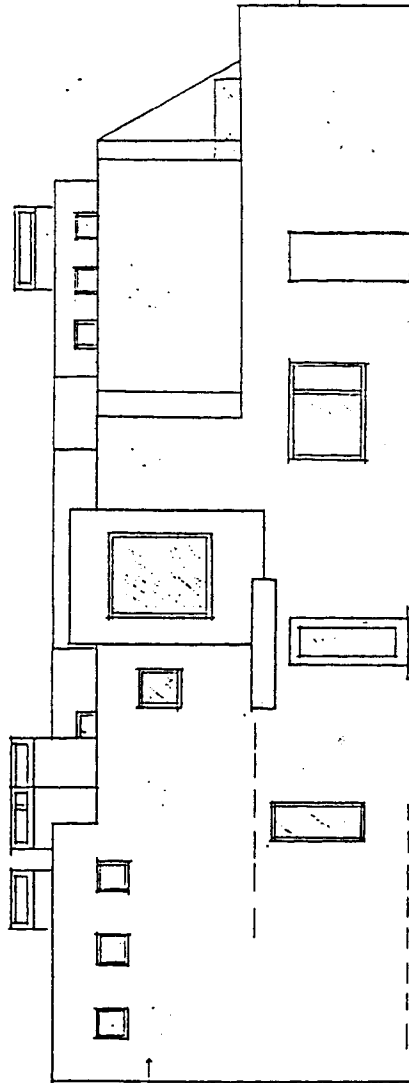
A-6

CALIFORNIA  
COASTAL COMMISSION  
SOUTH CENTRAL COAST DISTRICT

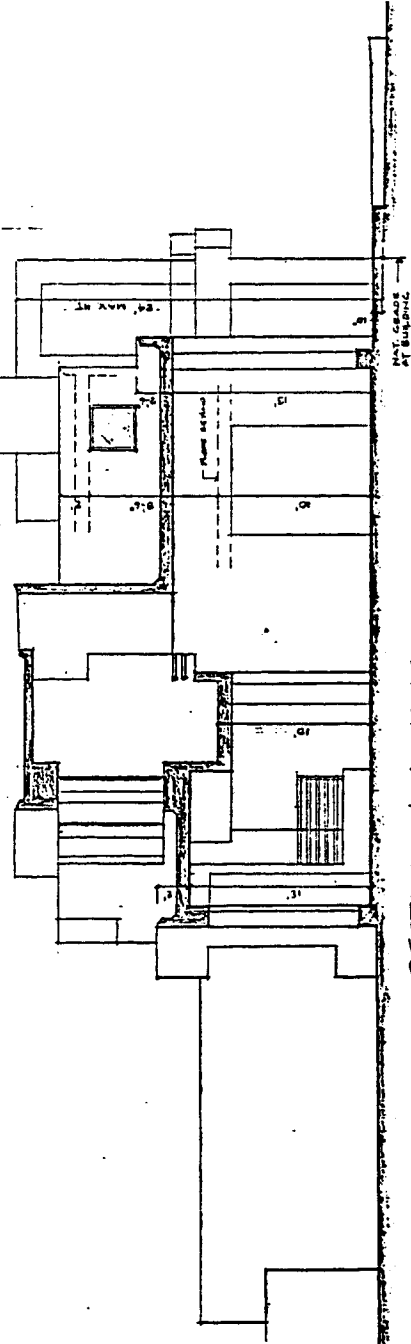
EXHIBIT NO.	8
APPLICATION NO.	4-99-222
N & W Elevations	



SOUTH ELEVATION 1/4" = 1'-0"



EAST ELEVATION 1/4" = 1'-0"



SECTION A-A 1/4" = 1'-0"

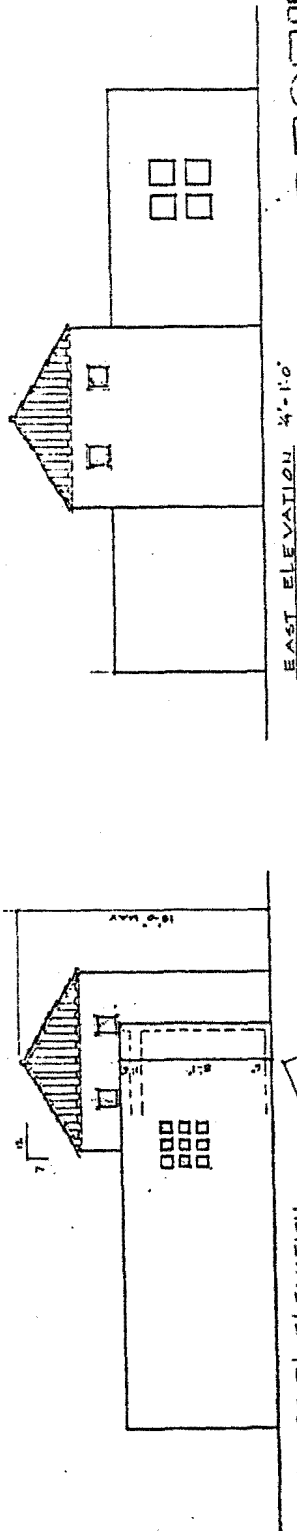
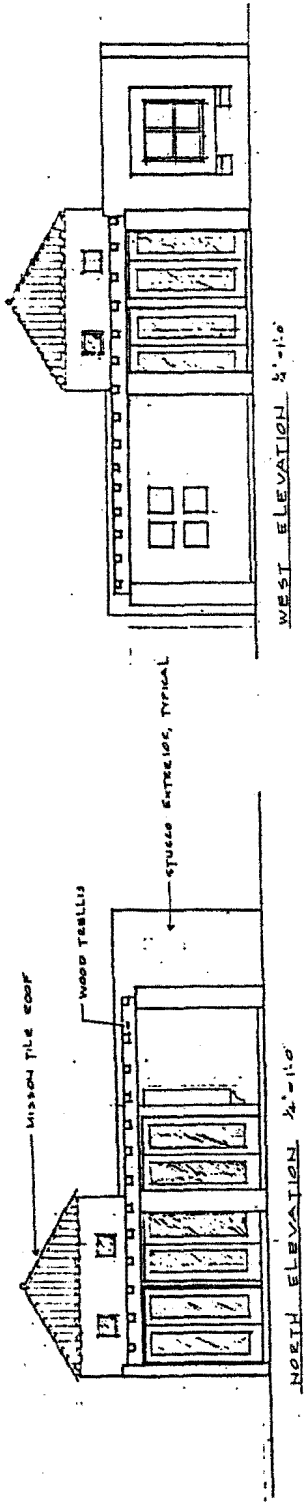
STUCCO EXTERIOR, TYPICAL

RECEIVED

OCT 06 1999

CALIFORNIA  
COASTAL COMMISSION  
SOUTH CENTRAL COAST, DISTRICT

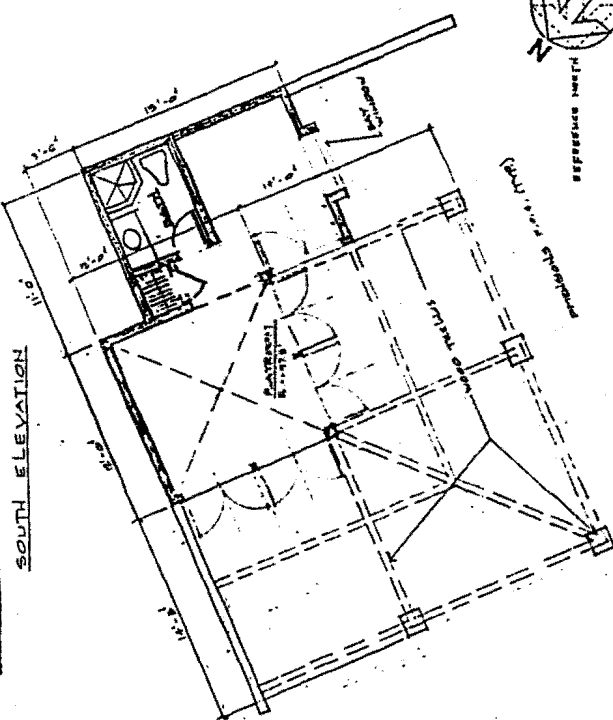
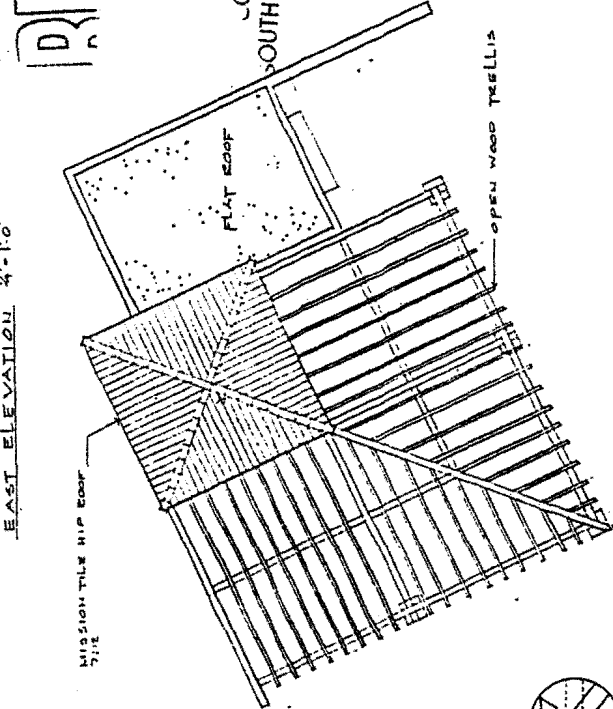
EXHIBIT NO. 9  
APPLICATION NO. 4-99-222  
S&E Elevations  
and Section



RECEIVED

OCT 06 1999

CALIFORNIA  
COASTAL COMMISSION  
SOUTH CENTRAL COAST DISTRICT



ROOF PLAN 1/4" = 1'-0"

FLOOR PLAN 1/4" = 1'-0"

EXHIBIT NO. 10
APPLICATION NO. 4-99-222
Cabana