CALIFORNIA COASTAL COMMISSION
SAN DIEGO AREA
7575 METROPOLITAN DRIVE, SUITE 103
SAN DIEGO, CA 92108-4421
(619) 767-2370

RECORD PACKET COPY

Thu 7f

Filed:	September 14, 2005
49th Day:	November 2, 2005
180th Day:	March 13, 2006
Staff:	DL-SD
Staff Report:	October 26, 2005
Hearing Date:	November 16-18, 2005

REGULAR CALENDAR
STAFF REPORT AND PRELIMINARY RECOMMENDATION

Application No.: 6-05-95

Applicant: Donald Stroben, et.al. Agent: Walt Crampton

Description: Maintenance of an existing 325 foot long tied-back seawall at the base of a coastal bluff below eight single-family residential properties by reapplication of sacrificial concrete cover to the lower 11 feet of the wall and infilling a notch behind the wall, and removal of existing post and board debris and hyroseeding on upper bluff below two residences.

Site: 249-311 Pacific Avenue, Solana Beach, San Diego County. APN 263-312-03, -04, -05, -06, -08, -09, -10, -28.

STAFF NOTES:

Summary of Staff's Preliminary Recommendation:

Staff is recommending approval of the proposed maintenance project. The proposed project is necessary maintenance to an existing seawall project approved by the Commission in 1999. As part of the permit approval, the Commission required that the applicants perform regular monitoring of the site and apply for permits for maintenance to the seawall as necessary. The proposed project would restore the seawall to its approved configuration, and does not involve any expansion to the height or linear extent of the wall.

The previously approved seawall was necessary because the existing bluff-top residences were in danger from erosion as a result of wave action, the exposure of a clean sands lens, and a substantial bluff collapse that had occur below one of the residences. Based on the information previously submitted by the applicants, if shoreline protection is not maintained at the site through a project such as the one proposed, bluff retreat is expected to continue, again threatening the existing bluff-top structures. Up to this point, the existing seawall appears to have had the intended effect of significantly delaying the construction of more extensive shoreline and upper bluff protection, which would likely have more significant adverse impacts on coastal resources such as visual quality, shoreline sand supply, public access, and recreation. The Commission's geologist and

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.

See attached page.

III. Special Conditions.

The permit is subject to the following conditions:

1. Final Plans. **PRIOR TO THE ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT**, the applicants shall submit for review and written approval of the Executive Director, final seawall repair, irrigation and drainage plans in substantial conformance with the submitted plans attached to the monitoring report dated June 3, 2005 by TerraCosta Consulting, Inc. The final plans shall be approved by the City of Solana Beach and include the following:

a. Detail regarding the construction method and technology utilized for texturing and coloring the seawall. Said plans shall confirm, and be of sufficient detail to verify, that the seawall shotcrete wall color and texture closely match the adjacent natural bluffs. The plan shall include a color board indicating the color of the fill material.

b. The seawall repairs shall conform as closely as possible to the natural contours of the bluff, and shall not protrude beyond the bluff face beyond the width of the seawall originally approved in coastal development permit #6-99-100, or the existing linear distance of the wall, except for the minimum necessary to taper the notch fill from the seawall to the bluff as shown on the above referenced plans.

c. Any existing permanent irrigation system located on each of the blufftop sites shall be removed or capped.

d. All runoff from impervious surfaces on the blufftop lots shall be collected and directed away from the bluff edge towards the street.

e. Existing accessory improvements (i.e., decks, patios, pool, walls, etc.) located in the geologic setback area (40 feet) on the blufftop site shall be detailed and drawn to scale on the final approved site plan.

f. During construction of the approved development, disturbance to sand and intertidal areas shall be minimized to the maximum extent feasible. All excavated beach sand shall be redeposited on the beach. Local sand, cobbles or shoreline rocks shall not be used for backfill or for any other purpose as construction material.

4. Future Response to Erosion. If in the future the permittees seek a coastal development permit to construct additional bluff or shoreline protective devices, the permittees shall include in the permit application information concerning alternatives to the proposed bluff or shoreline protection that will eliminate impacts to scenic visual resources, recreation and shoreline processes. Alternatives shall include but not be limited to: relocation of all or portions of the principal structure that are threatened, structural underpinning, and other remedial measures capable of protecting the principal structure and providing reasonable use of the property, without constructing bluff or shoreline stabilization devices. The information concerning these alternatives must be sufficiently detailed to enable the Coastal Commission or the applicable certified local government to evaluate the feasibility of each alternative, and whether each alternative is capable of protecting existing structures that are in danger from erosion. No additional bluff or shoreline protective devices shall be constructed on the adjacent public bluff face above the approved seawall or on the beach in front of the proposed seawall unless the alternatives required above are demonstrated to be infeasible. No shoreline protective devices shall be constructed in order to protect ancillary improvements (patios, decks, pools, fences, landscaping, etc.) located between the principal residential structures and the ocean.

5. Future Maintenance/Debris Removal. Within 15 days of completion of construction of the proposed maintenance, the permittees shall remove all debris that may have been deposited on the bluff, beach or in the water as a result of maintenance of the shoreline protective devices. The permittees shall also be responsible for the removal of debris resulting from failure or damage of the shoreline protective devices in the future. In addition, the permittees shall maintain the permitted seawall in its approved state. 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 exempt maintenance as defined in Section 13252 of Title 14 of the California Code of Regulations to restore the structure to its original condition as approved herein, will require a coastal development permit or an amendment to this permit. **However, in all cases, if, after inspection, it is apparent that repair and maintenance is necessary, including maintenance of the color of the structures to ensure a continued match with the surrounding native bluffs, the permittees shall contact the Executive Director to determine whether a coastal development permit or an amendment to this permit is necessary, and, if necessary, shall subsequently apply for a coastal development permit or permit amendment for the necessary maintenance.**

6. As-Built Plans. **Within 60 days following completion of the project**, the permittees shall submit as-built plans of the approved seawall maintenance that includes measurements of the distance between the residences and accessory improvements, on the one hand, and the bluff edge (as defined by Section 13577 of Title 14 of the California Code of Regulations), on the other, taken at 12 or more locations. The locations for these measurements shall be identified through permanent markers, benchmarks, survey position, written description, or other method to allow annual measurements to be taken at the same bluff location and to allow accurate measurement of bluff retreat.

If the State Lands Commission is unable to provide a final determination in the timely manner despite due diligence from the applicants, the applicants may submit a completed application to the State Lands Commission for such a determination in compliance with this condition.

10. Public Rights. By acceptance of this permit, each applicant acknowledges, on behalf of him/herself and his/her successors in interest, that issuance of the permit and construction of the permitted development shall not constitute a waiver of any public rights which may exist on the property.

11. Assumption of Risk, Waiver of Liability and Indemnity Agreement. By acceptance of this permit, the applicants acknowledge and agree (i) that the site may be subject to hazards from erosion and coastal bluff collapse; (ii) to assume the risks to the applicants and the property that is the subject of this permit of injury and damage from such hazards in connection with this permitted development; (iii) to unconditionally waive any claim of damage or liability against the Commission, its officers, agents, and employees for injury or damage from such hazards; and (iv) 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.

12. Deed Restriction: **PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT**, the applicants shall submit to the Executive Director for review and approval documentation demonstrating that the applicants have executed and recorded against the parcel(s) governed by this permit a deed restriction(s), in a form and content acceptable to the Executive Director: (1) indicating that, pursuant to this permit, the California Coastal Commission has authorized development on the subject property, subject to terms and conditions that restrict the use and enjoyment of that property; and (2) imposing the Special Conditions of this permit as covenants, conditions and restrictions on the use and enjoyment of the Property. The deed restriction shall include a legal description of the entire parcel or parcels governed by this permit. The deed restriction shall also indicate that, in the event of an extinguishment or termination of the deed restriction for any reason, the terms and conditions of this permit shall continue to restrict the use and enjoyment of the subject property so long as either this permit or the development it authorizes, or any part, modification, or amendment thereof, remains in existence on or with respect to the subject property.

IV. Findings and Declarations.

The Commission finds and declares as follows:

1. Detailed Project Description/History. The proposed project is non-exempt maintenance of an existing 35-foot high, approximately 352-foot long shotcrete tied-back seawall on public beach. The proposed maintenance will consist of reapplying approximately 6 inches of sacrificial, erodible concrete cover to the lower 11 feet of the

determine whether permits are necessary, and shall subsequently apply for a coastal development permit for the required maintenance.

In compliance with this condition and other conditions requiring regular monitoring of the seawall, the applicants have submitted a monitoring report that identifies that the seawall shows no signs of structural distress, but does require maintenance in areas affected by cobble-induced abrasion, and recommends the proposed maintenance. The upper bluff debris removal and hydroseeding are not specifically required to maintain the seawall, but the debris constitutes a safety hazard to the beach visitors. The hydroseeding is intended to fill in denuded areas of the bluff face in the same general location where, as part of the original project, the upper bluff was reconstructed and planted with native plant material.

The City of Solana Beach does not yet have a certified LCP. Therefore, Chapter 3 policies of the Coastal Act are the standard of review.

3. Geologic Conditions and Hazards. Section 30235 of the Coastal Act states, in part:

Revetments, breakwaters, groins, harbor channels, seawalls, cliff retaining walls, and other such construction that alters natural shoreline processes shall be permitted when required to serve coastal-dependent uses or to protect existing structures or public beaches in danger from erosion, and when designed to eliminate or mitigate adverse impacts on local shoreline sand supply.

In addition, Section 30253 of the Coastal Act states, in part:

New development shall:

(l) 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...

Coastal Act Section 30235 acknowledges that seawalls, revetments, cliff retaining walls, groins and other such structural or "hard" solutions alter natural shoreline processes. Thus, such devices are required to be approved only when necessary to protect existing structures. The Coastal Act does not require the Commission to approve shoreline altering devices to protect vacant land or in connection with construction of new development. A shoreline protective device proposed in those situations is likely to be inconsistent with various other Coastal Act policies. For example, Section 30253 addresses new development and requires that it neither create nor contribute significantly to erosion.

Since the existing seawall was approved, the presence of this clean sand layer within the bluffs along the entire extent of the Solana Beach shoreline has been identified in other geotechnical reports submitted in conjunction with seawall, seacave and seawall infill projects in Solana Beach (ref. 6-99-103/ Coastal Preservation Association; CDP 6-00-9/Del Mar Beach Club; 6-00-36/Scism; 6-00-138/Kinzel, Greenberg; 6-02-02/Gregg, Santina; 6-02-84/Scism and; 6-03-33/Surfsong).

In the case of the seawall at the subject site, the applicants submitted evidence demonstrating that the existing primary residences were in danger from erosion. All eight residences were deemed to be susceptible to upper-bluff failures within the near future (the next several years). The study specifically identified the clean sands layer as requiring structural restraint, without which significant bluff failures were expected to occur during the 1999 winter storm season, assuming any reasonable level of storm activity. The report concluded that the coastal bluffs beneath all eight lots, if not stabilized in the near future, would experience upper bluff failures similar to the one which had occurred beneath 261 Pacific Avenue, putting all eight bluff-top residences at risk, and requiring significant upper-bluff fortification in addition to the proposed seawall to protect the residences.

The applicants prepared a detailed analysis of alternatives to the proposed seawall, including removal or relocation of the existing bluff-top structures. Ultimately, the Commission determined that while the 35-foot high seawall would have impacts on shoreline processes, public access, landform alteration and the visual quality of the area, the wall was the only feasible alternative to protect the existing structures. In the absence of the project, the bluffs were expected to retreat at such a rapid rate that even if the seaward portions of the residences were removed, the remainder of the structures would be threatened in the near future.

Five years later, the approved seawall appears to be functioning largely as intended. The upper bluffs have not collapsed, and the surface appearance of the wall is a relatively close match to the surrounding and adjacent bluffs. However, erosion and bluff collapse continue to be a threat in Solana Beach. Since the subject project was approved, there have been approximately 27 emergency permits granted for various types of shoreline protection on Solana Beach's bluffs. The applicants have not submitted evidence specifically documenting that the existing bluff-top structures are currently in danger of collapse from erosion. The geotechnical report submitted with the application indicates that the existing wall shows no sign of structural distress, but does require maintenance in areas affected by cobble-induced abrasion. Several of the anchor heads that comprise the lower row of tieback anchors have become exposed due to erosion. In time, the other anchor heads will become exposed, which subjects them to marine abrasion and is unsightly. A notch has also developed behind the southern end of the wall. The maintenance includes filling this notch behind the wall, with the fill gradually tapering back to the bluff edge. The tapered fill is designed to avoid the creation of a hard wall perpendicular to the bluff, which would create a surface for reflecting damaging wave energy into the bluff.

likely with substantially greater recreational, visual and sand supply impacts than the existing seawall. If substantial modifications were proposed that would extend the previously anticipated lifespan of the seawall or expansion of the seawall itself were proposed, the Commission would reevaluate the need for additional mitigation at that time. In addition, once the seawall has reached the end of the anticipated 30-year lifespan, any further requests for maintenance of the site would be subject to additional mitigation requirements at that time.

If the seawall proposed for repair were damaged in the future (e.g. as a result of wave action, storms, etc.) it could threaten the stability of the site and adjacent properties, which could lead to the need for more beach/bluff alteration. In addition, damage to the seawall could adversely affect the beach by resulting in debris on the beach and/or creating a hazard to the public using the beach. Excessive wear of the seawall could result in the loss of or change to the color or texture of the seawall resulting in adverse visual impacts (discussed in more detail in a subsequent section of this report). Therefore, in order to find the proposed seawall repairs consistent with the Coastal Act, the Commission finds that the condition of the structures must continue to be maintained in their approved state for the life of the structures. Further, in order to ensure that the permittees and the Commission know when repairs or maintenance are required, the permittees must continue to monitor the condition of the seawall annually, for three years and then at three-year intervals after that, unless a major storm event occurs. The monitoring will ensure that the permittees and the Commission are aware of any damage to or weathering of the shoreline structures and can determine whether repairs or other actions are necessary to maintain the structures in their approved state before damage occurs resulting in the need for potentially more substantial structures.

Therefore, Special Condition #2 notes that the applicants are still required to comply with the previous permit requirements on CDP #6-99-100 for monitoring reports that evaluate the condition and performance of the repaired seawall and overall site stability. That permit requires the applicants to submit annual reports with recommendations, if any, for necessary maintenance, repair, changes or modifications to the project. In addition, the permit requires the applicants to perform the necessary repairs through the coastal development permit process in the future.

Special Condition #1 requires the applicants to submit final plans for the project indicating that the seawall repairs conform to the bluff contours and demonstrating that any existing irrigation systems on the blufftop have been removed. Irrigation on or adjacent to the coastal bluffs can lead to saturation of the ground, particularly when leaks or breakages occur, destabilizing the bluffs and impacting the ability of the seawall to adequately stabilize the site. Submission of final plans will ensure that overall site conditions which could adversely impact the stability of the bluff have been addressed.

Special Condition #4 requires that feasible alternative measures must be explored and either implemented or shown to be infeasible on the applicants' blufftop property in the future, should additional stabilization be proposed, which would avoid additional alteration of the natural landform of the public beach or coastal bluffs, but would reduce

such as these, has previously been proposed and accepted for the site, and the project is expected to stave off the need for more substantial shoreline protective devices. The Commission's staff coastal engineer and geologist have reviewed the applicants' geotechnical assessment and concur with its conclusions. As conditioned, there are no other less damaging alternatives available to address the needed maintenance. Therefore, as conditioned, the Commission finds that the proposed seawall maintenance is consistent with Sections 30235 and 30253 of the Coastal Act.

4. Visual Resources/Alteration of Natural Landforms. Section 30240 (b) of the Coastal Act is applicable and states:

> (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.

In addition, Section 30251 of the Coastal Act states, in part:

> The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas . . .

The proposed development will occur on the face of a coastal bluff and on the public beach. There is an existing seawall on the site which has been relatively successfully colored and textured to match the bluff face, and as such, is not a unduly prominent visual feature of the area. In order to avoid adverse impacts to the visual resources of the shoreline, it is important that the proposed refacing be similarly textured and colored to match the surrounding natural bluffs. Therefore, Special Condition #1 requires the submittal of detailed plans, color samples, and information on the proposed construction methods and technology for the surface treatment of repairs.

In addition, to address other potential adverse visual impacts, Special Conditions #2 and #5 have been attached which require the applicants to monitor and maintain the proposed seawall in its approved state. In this way, the Commission can be assured that the seawall will be maintained so as to effectively mitigate its visual prominence.

Therefore, as conditioned, the Commission finds that potential visual impacts associated with the proposed development have been reduced to the maximum extent feasible and the proposed development will include measures to prevent impacts that would significantly degrade the visual quality of the coastal area or the adjacent park and recreation area (beach area). Thus, the project can be found consistent with Sections 30240 and 30251 of the Coastal Act.

approval. This type of project is expected to reoccur periodically throughout the life of the seawall to ensure the wall continues to operate effectively. In the absence of normal repairs such as the proposed project, the seawall would likely start wearing away unevenly and unattractively, additional anchor heads will be exposed, and eventually, failure of the seawall and subsequent bluff collapse would occur. In restoring the seawall to its previous configuration, the proposed project will not have any new impacts on public access and recreation not anticipated in the original approval.

Per the original permit approval for the seawall, Special Condition #2 requires the applicants to continue to annually evaluate the condition and performance of the seawall as required by CDP #6-99-100. Under the terms of that permit, the applicants must apply for another Coastal Development Permit or Permit Amendment for any necessary maintenance, repair, changes or modifications to the project recommended by the monitoring report that require a coastal development permit. As conditioned, public access can be protected to the maximum extent feasible.

Much of the beach is accessible in this area only at lower tides, and thus, the protection of a few feet of beach along the toe of the bluff is still important. This stretch of beach has historically been used by the public for access and recreation purposes, however, the proposed maintenance involves only the placement of 6-inches of cover onto an existing seawall, area that has previously been accounted for in the original permit action. Special Condition #10 acknowledges that the issuance of this permit does not waive the public rights that exist on the property. The fill may be located on State Lands property, and as such, Special Condition #9 requires the applicants to obtain any necessary permits or permission from the State Lands Commission to perform the work.

In addition, the use of the beach or public parking areas for staging of construction materials and equipment can also impact the public's ability to gain access to the beach. While the applicants have not submitted a construction staging and material storage plan for the subject development, it is likely that beach access to the site will occur via Fletcher Cove which is located approximately 1,000 feet south of the subject site. In other developments for shoreline protection along this stretch of Solana Beach shoreline, the Commission has authorized the temporary placement of steel-tracked construction equipment (which cannot traverse asphalt streets) upland of the Fletcher Cove access ramp, in an area that is not currently used for parking. In addition, the Commission has previously authorized the use of parking spaces in an existing City-owned parking lot across the street from Fletcher Cove known as the "Distillery Lot" (for its previous use) for staging and storage of equipment during construction. This free, City-owned parking area is within easy walking distance of Fletcher Cove and is currently available to any beach users or patrons of the several small commercial facilities surrounding the lot. However, it is also the only off-street, open area in the vicinity of Fletcher Cove that can accommodate the type of equipment and vehicles required to construct the proposed project, other than Fletcher Cove itself. In addition, the City of Solana Beach has in the past indicated that the lot is used only minimally, and thus has an excess capacity which can be allocated to staging and storage for the project, with only a minimal impact to beach uses.

The construction of the proposed seawall maintenance will occur on the public beach within a few feet of ocean waters. Construction activities will only occur at low tides when access along the beach is available. However, at high tides ocean waters will extend up to face of the seawall such that the repairs at times will be subject to wave action. The method of maintenance involves the multiple application of shotcrete that is sprayed over the face of the existing wall. This shotcrete material will eventually be sculpted and colored to closely match the appearance of the natural bluffs. Based on similar projects approved by the Commission, approximately 10 to 15% of this shotcrete (concrete) material can rebound off the structure onto the beach as it is being applied. Because the material is wet, it cannot be picked up until it hardens. The Commission has recently become aware that in previously constructed shoreline protection projects along the Solana Beach shoreline, this shotcrete "rebound" has not been removed before the ocean waters rise and mix with the wet shotcrete material. After the return of low tides, any remaining hardened shotcrete is then picked up by the construction crews and removed from the beach. According to the Commission's water quality division and staff of the State Regional Water Quality Control Board, San Diego Region, the mixing of this rebound shotcrete with ocean waters is a violation of the State Water Quality Act since it would involve the unauthorized discharge of a pollutant into ocean waters.

Along other sections of the coast, shotcrete has been applied without the associated rebound problems. Contractors place tarps on the beach to collect material that drops from the wall. They also use backdrops or drapes along the face of the bluff to contain splatter and rebound and prevent scatter of shotcrete material all around the beach. These and other techniques are possible ways to control shotcrete debris and prevent discharge into the marine environment.

Special Condition #3 requires that during the construction of the project, "the permittees shall not store any construction materials or waste where it will be or could potentially be subject to wave erosion and dispersion". This is a common condition for the Commission to impose on shoreline protective device projects. However, based on information submitted for similar projects, this special condition has not effectively served to prohibit the contamination of ocean waters by rebounded shotcrete. Therefore, to assure that the subject development will not result in the pollution of the ocean waters, Special Condition #7 has been attached. Special Condition #7 requires the applicants to submit a Polluted Runoff Control Plan that incorporates Best Management Practices (BMPs), for Executive Director approval, for the construction of the proposed seawall. Construction methods must be devised to assure this rebound shotcrete material does not mix with or pollute ocean waters. With appropriate BMPs, the potential for this polluted material from the site making its way into the ocean will be eliminated. In addition, Special Condition #3 prohibits the storage of construction vehicles in the surf zone, or the washing of equipment on the beach or parking lot, both of which protect the receiving waters from an influx of pollutants, thus protecting biological productivity and marine resources. Therefore, as conditioned, the Commission finds the proposed development consistent with the marine and water quality protection policies of the Coastal Act.

through a comprehensive planning effort that analyzes the impact of such a decision on the entire City shoreline.

The location of the proposed seawall repair is designated for Open Space Recreation in the City of Solana Beach Zoning Ordinance and General Plan, and was also designated for open space uses under the County LCP. As conditioned, the subject development is consistent with these requirements. Based on the above findings, the proposed development is consistent with the Chapter 3 policies of the Coastal Act in that the need for the maintenance of the existing shoreline protective devices has been documented and its adverse impacts on beach sand supply and on adjacent unprotected properties will be mitigated.

Therefore, the Commission finds the proposed development, as conditioned, is consistent with the Chapter 3 policies of the Coastal Act, and will not prejudice the ability of the City of Solana Beach to complete a certifiable local coastal program.

8. Consistency with the California Environmental Quality Act (CEQA).
Section 13096 of the Commission's Code of Regulations requires Commission approval of Coastal Development Permits to be supported by a finding showing the permit, as conditioned, to be consistent with any applicable requirements of the California Environmental Quality Act (CEQA). Section 21080.5(d)(2)(A) of CEQA prohibits a proposed development from being approved if there are feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse effect which the activity may have on the environment.

The proposed project has been conditioned in order to be found consistent with the geologic stability, visual quality, water quality, and public access policies of the Coastal Act. Mitigation measures, including conditions addressing construction techniques consistent with the geotechnical report, the color of construction materials and timing of construction will minimize all adverse environmental impacts. As conditioned, there are no feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse impact which the activity may have on the environment. Therefore, the Commission finds that the proposed project is the least environmentally-damaging feasible alternative and is 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 permittees 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

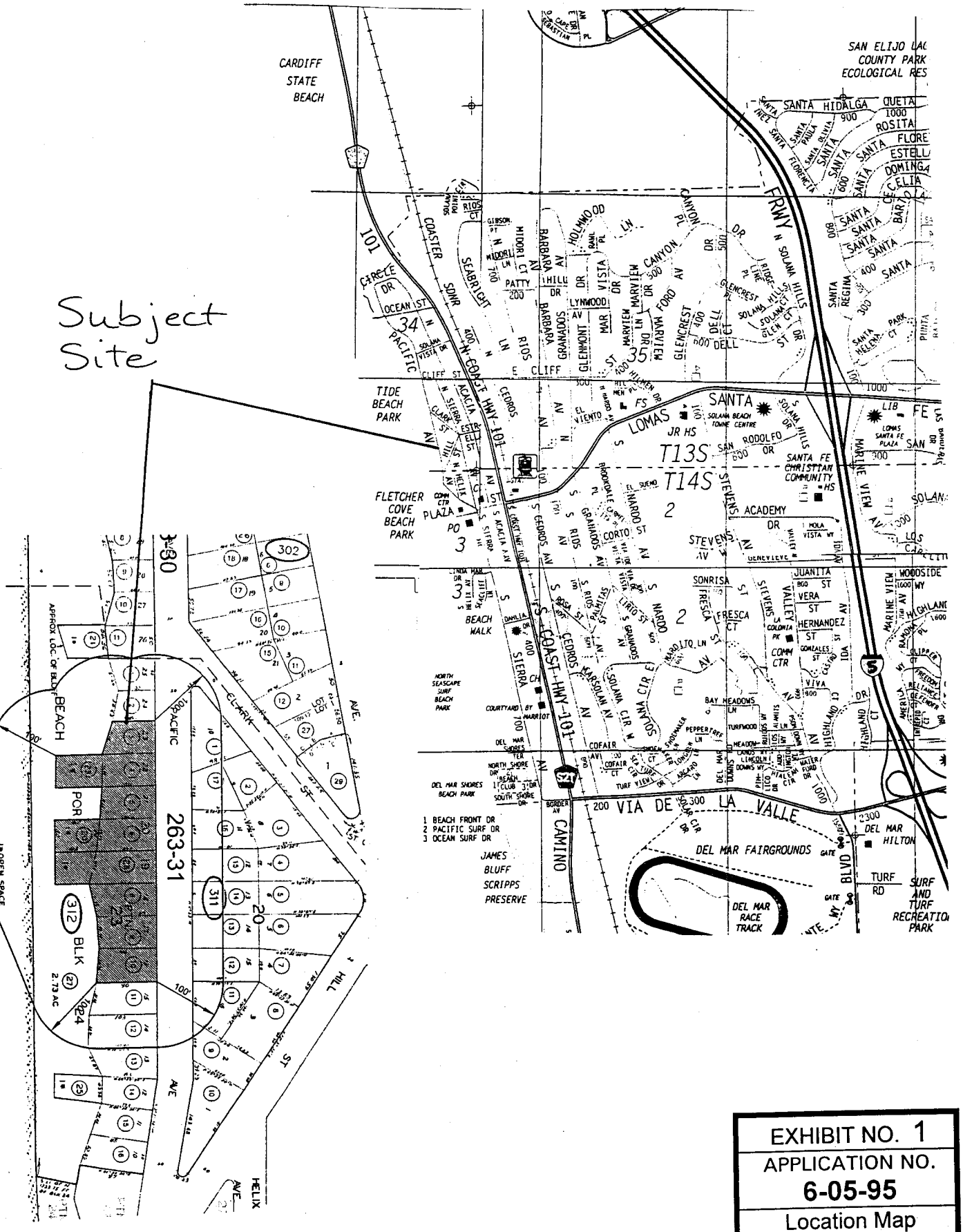
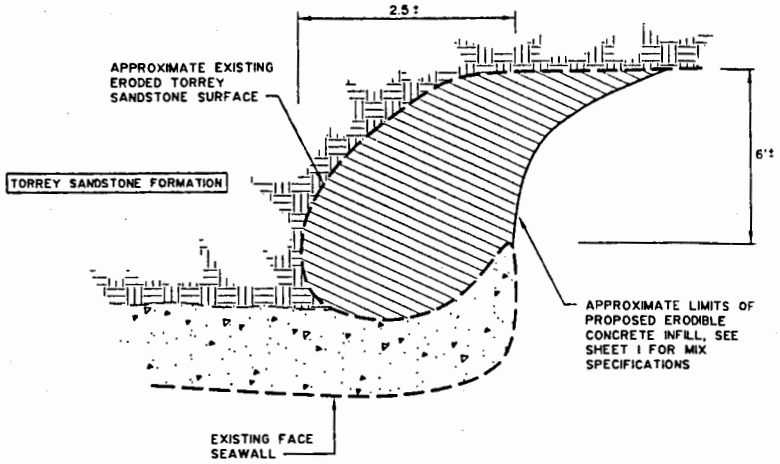


EXHIBIT NO. 1
APPLICATION NO. 6-05-95
Location Map
California Coastal Commission

NOTE: IF DRAWING IS NOT FULL SIZE (24X36) THEN REDUCE SCALE ACCORDINGLY

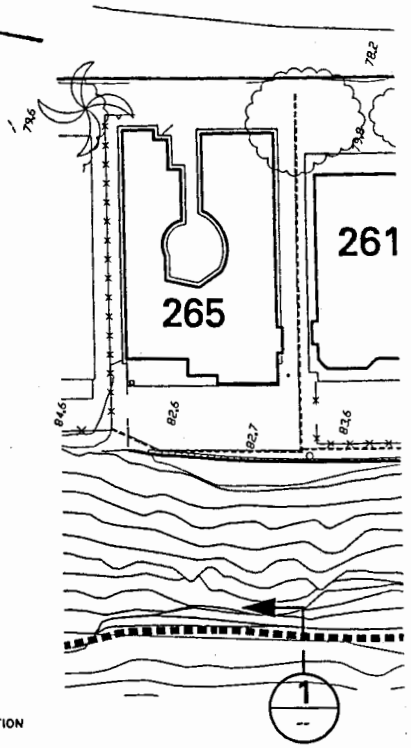
0 1 2 3

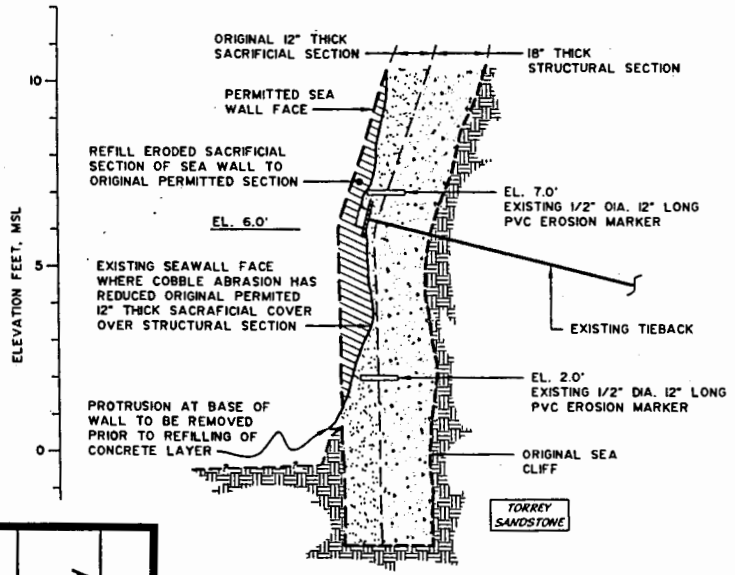
ORIGINAL SCALE IN INCHES FOR REDUCED PLANS



WALL END DETAIL - PLAN 3

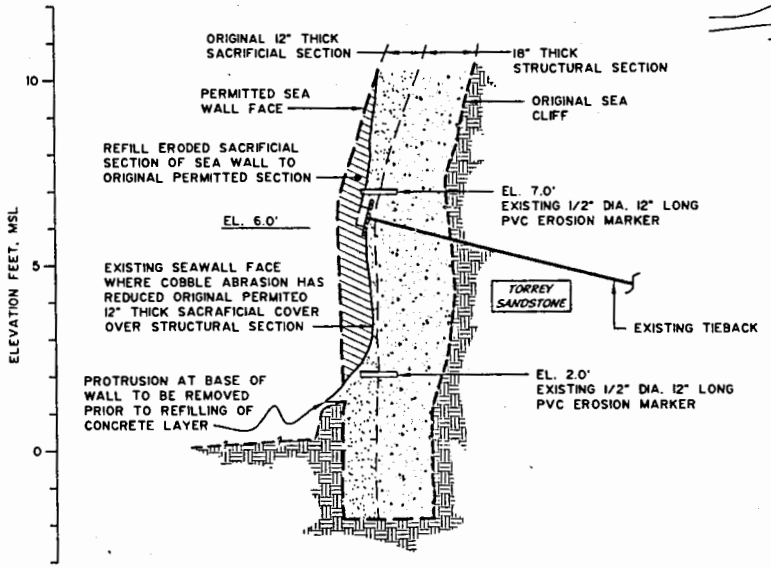
NOT TO SCALE





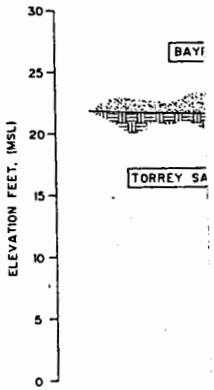
VERTICAL SECTION 1

SCALE: 1"=2'



VERTICAL SECTION 2

SCALE: 1"=2'



NOTES:

1. EXCAVATE KEY A MIN. OF 2' INTO EXISTING FORMATION AT MOUTH OF NOTCH AS SHOWN.
2. CLEAN CAVE OF BEACH SAND PRIOR TO FILLING WITH ERODIBLE CONCRETE.

EXHIBIT NO. 3
APPLICATION NO. 6-05-95
Typical Vertical Sections
California Coastal Commission

WAS PREPARED UNDER THE SUPERVISION OF
DATE:
R.C.E. NO.: 23792
R OF WORK:
WALTER F. CRAMPTON
23792 EXP. DATE: 12-31-05

TERRACOSTA CONSULTING GROUP
ENGINEERS & GEOLOGISTS
4455 MURPHY CANYON ROAD, SUITE 100
SAN DIEGO, CALIFORNIA 92123
(858) 573-6900

DESIGN:
DRAWN:
CHECKED:

REVISIONS				
REV.		BY	DATE	APP.

249-311 PACIFIC AVENUE SEA WALL MAINTENANCE

PROPOSED PLAN & DETAILS

REC
BY:
R.C.E.:
DATE: