

## CALIFORNIA COASTAL COMMISSION

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## RECORD PACKET COPY



# Wed 8a

Staff: DL-SD  
Staff Report: May 18, 2005  
Hearing Date: June 7-10, 2005

## STAFF REPORT AND RECOMMENDATION ON APPEAL

LOCAL GOVERNMENT: City of Imperial Beach

DECISION: Approval with Conditions

APPEAL NO.: A-6-IMB-04-152

APPLICANT: Oceanfront Condominium LLC

PROJECT DESCRIPTION: Repair of existing revetment in front of a 14-unit condominium building including repositioning stones that have been dislodged. No new rock or seaward encroachment is proposed.

PROJECT LOCATION: 1456 Seacoast Drive, Imperial Beach, San Diego County.  
APN 263-040-22

APPELLANTS: Commissioners Sara Wan and Patrick Kruer

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### STAFF NOTES:

At its January 12, 2005 hearing, the Commission found Substantial Issue exists with respect to the grounds on which the appeal was filed. This report represents the de novo staff recommendation.

### Summary of Staff's Preliminary Recommendation:

Staff recommends the Commission approve the de novo permit with several special conditions. The project involves repairing an existing rock revetment by relocating riprap that has strayed onto the beach. The existing revetment encroaches approximately 30 feet seaward of the western property line onto public beach. However, the revetment was permitted through a coastal development permit issued by the City of Imperial Beach in 1989, and the proposed repairs will pull back the seaward extent of revetment approximately 5 feet such that the configuration of the revetment will be consistent with the previously approved project. No new rock will be imported. As a result, the encroachment by the revetment on public beach will be reduced by approximately 600 sq.ft. feet. Proposed Special Conditions on the project require final plans documenting the permitted seaward extent of the revetment and requiring yearly monitoring of the

revetment to ensure that ensure no additional seaward encroachment occurs, and a requirement for maintenance of the revetment to ensure that public access and recreation are not adversely impacted in the future. The standard of review for the appeal is the certified LCP and the public access policies of the Coastal Act.

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Substantive File Documents: "Response to California Coastal Commission Appeal, Revetment Maintenance" by GeoSoils, Inc. dated 3/31/05; "Revetment Inspection, 1456 Seacoast Drive, Imperial Beach, CA" by Skelly Engineering, June 19, 2003; City of Imperial Beach CDP CP 04-116; City of Imperial Beach certified Local Coastal Program (LCP).

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I. PRELIMINARY STAFF RECOMMENDATION:

The staff recommends the Commission adopt the following resolution:

**MOTION:**     *I move that the Commission approve Coastal Development Permit No. A-6-IMB-04-152 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.

**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 the certified LCP and the public access policies of Chapter 3 of the Coastal Act. 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.

See attached page.

III. Special Conditions.

The permit is subject to the following conditions:

1. Final Surveyed Revetment Plans. **PRIOR TO THE ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT** the applicant shall submit to the Executive Director for review and written approval, final revetment plans for the proposed project that have been approved by the City of Imperial Beach. Said plans shall be in substantial conformance with the plans prepared by GeoSoils, Inc. dated 3/30/05. The plans shall identify permanent benchmarks from the property line or another fixed reference point from which the elevation and seaward limit of the revetment can be referenced for measurements in the future, and shall indicate the following:

- a. The toe of the revetment shall extend no further seaward than 25 feet west of the western property line at a slope of 1.5:1, as shown on the above referenced plans.
- b. The top of the revetment shall not exceed elevation +17 feet MSL at any point.

2. Long-Term Monitoring Program. **PRIOR TO THE ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT**, the applicant shall submit for review and written approval of the Executive Director, a long-term monitoring plan for the existing shoreline protection. The purpose of the plan is to monitor and identify damage/changes to the revetment such that repair and maintenance is completed in a timely manner to avoid further encroachment of the revetment on the beach. The monitoring plan shall incorporate, but not be limited to the following:

- a. An evaluation of the current condition and performance of the revetment, addressing any migration or movement of rock which may have occurred on the site and any significant weathering or damage to the revetment that may adversely impact its future performance.
- b. Measurements taken from the benchmarks established in the survey as required in Special Condition #1 of CDP #A-6-IMB-04-152 to determine settling or seaward movement of the revetment. Changes in the beach profile fronting the site shall be noted and the potential impact of these changes on the effectiveness of the revetment evaluated.
- c. Recommendations on any necessary maintenance needs, changes or modifications to the revetment to assure its continued function and to assure no encroachment beyond the permitted toe.

The above-cited monitoring information shall be summarized in a report prepared by a licensed engineer familiar with shoreline processes and submitted to the Executive Director for review and written approval. The report shall be submitted to the Executive Director and the City of Imperial Beach Engineering Department after each winter storm season but prior to May 1st of each year starting with May 1, 2006. Monitoring shall continue throughout the life of the revetment or until the revetment is removed or replaced under a separate coastal development permit.

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

3. Storage and Staging Areas/Access Corridors. **PRIOR TO THE ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT**, the applicant shall submit to the Executive Director for review and written approval, final plans indicating the location of access corridors to the construction site and staging areas. The final plans shall indicate that:

- a) No overnight storage of equipment or materials shall occur on sandy beach or public parking spaces.
- b) Access corridors shall be located in a manner that has the least impact on public access to and along the shoreline.
- c) No work shall occur on the beach on weekends or holidays between Memorial Day weekend and Labor Day of any year.
- d) The staging site shall be removed and/or restored immediately following completion of the development.

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

4. Maintenance Activities. The permittee shall be responsible for the maintenance of the existing riprap revetment in its approved state, until such time as the revetment is relocated or removed under an approved coastal development permit. However, if it is determined that repair and/or maintenance to the revetment is necessary, the permittee shall contact the Commission office to determine whether an amendment to this permit is necessary. Based on the information and recommendations contained in the monitoring report required in Special Condition #2 of CDP #A-6-IMB-04-152 above, any stones or materials that become dislodged or any portion of the revetment that is determined to extend beyond the approved toe shall be removed from the beach, after authorization by the Commission.

5. Assumption of Risk, Waiver of Liability and Indemnity. By acceptance of this permit, the applicant acknowledges and agrees (i) that the site may be subject to hazards from waves, storm waves, bluff retreat and erosion; (ii) 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; (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.

6. Other Conditions Imposed By Local Government (CP 04-116, MF 730). Except as provided by this coastal development permit, this permit has no effect on conditions imposed by the City of Imperial Beach pursuant to an authority other than the Coastal Act. The conditions contained in this coastal development permit are in addition to the conditions imposed and required by the City of Imperial Beach.

7. Deed Restriction. **PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT**, the applicant shall submit to the Executive Director for review and approval documentation demonstrating that the applicant has executed and recorded against the privately-owned residential parcel(s) governed by this permit a deed restriction, 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. Project Description/History. The proposed project is repair of an existing rock revetment on the beach fronting a 14-unit condominium development. The revetment is located on the western portion of the site and extends across the entire ocean frontage of the lot (approximately 120 feet), and is part of a continuous revetment fronting several properties to either side. Stones on the revetment have rolled seaward such that the revetment currently extends approximately 30 feet west of the western property line onto the public beach.

At the time the project was approved by the City, the approved repairs could have allowed both the repositioning of existing stones that have been dislodged, and importing new stones. As approved, the repairs could potentially have involved new encroachment on public beach seaward of the existing revetment. However, the applicant has since

revised and clarified the project description to consist only of the repositioning of existing stones. Repositioning the stray stones and tightening up several deteriorated portions of the revetment will pull back the revetment to 25 feet seaward of the private property, reducing the encroachment on public beach by approximately 600 sq.ft.

The project site is located on the southernmost part of Imperial Beach, approximately four blocks south of Imperial Beach Boulevard, on the west side of Seacoast Drive. The area is characterized by a mix of single-family and multi-family residences. Public access to the beach is provided at a parking lot and accessway approximately 220 feet north of the site, and 280 feet south of the site.

The revetment was originally approved through a permit issued by the City of Imperial Beach in 1989 (CP 89-06/SPR 89-05/PM 89-06) for construction of a 9-unit condominium and revetment located at 1424 Seacoast Drive—the property immediately north of the subject site. The seawall revetment approved through that permit extended south along the ocean frontage to include the subject site.

2. Public Access, Recreation, and Shoreline Processes. The following policies of the certified City of Imperial Beach Local Coastal Program (“LCP”) apply to the proposed project:

**CO-1 The Beach**

Imperial Beach has few industries and must, therefore, rely on the attraction of tourists for economic development. The beach area is most critical and the City should:

1. Designate the beach as open space.
2. Retain public ownership of the beaches.
3. Insure continued public access to beaches and, where possible, provide additional access, as well as increased public parking opportunities in the beach area (see Parks, Recreation and Access Element).
4. Require landscaping of properties near the beach area to attain a pleasant visual image.
5. Assure continued replenishment of sand.

**P-1 Opportunities For All Ages, Incomes, and Life Styles**

To fully utilize the natural advantages of Imperial Beach's location and climate, a variety of park and recreational opportunities for residents and visitors shall be provided for all ages, incomes and life styles.

This means that:

- a. The beach shall be free to the public.
- b. Recreational needs of children, teens, adults, persons with disabilities, elderly, visitors and others shall be accommodated to the extent resources and feasibility permit.
- c. City residents need mini-parks, neighborhood parks, community parks, activity centers, special use and all-purpose parks.
- d. The City should pursue increased recreational opportunities for the general public in the Tijuana Estuary, Borderfield State Park, the beach and the South San Diego Bayfront.

### **P-2 Ocean and Beach Are The Principal Resources**

The ocean, beach and their environment are, and should continue to be, the principal recreation and visitor-serving feature in Imperial Beach. Oceanfront land shall be used for recreational and recreation-related uses whenever feasible.

### **GOAL 14 SHORELINE ACCESS**

**To provide physical and visual access in the City's five coastal resource areas for all segments of the population without creating a public safety concern, overburdening the City's public improvements, or causing substantial adverse impacts to adjacent private property owners.**

### **GOAL 16 SHORELINE PROTECTION**

**To manage the City's shoreline in a way which enhances the shoreline environment while also providing recreational opportunities and property protection.**

#### **S-10 Regulate Shoreline Land Use and Development**

The City should regulate shoreline land use and development by:

- a) Minimizing construction on beaches and in front of seacliffs.
- b) Require setbacks from beaches and low-lying coastal areas.
- c) Regulate sand mining if some were to occur.

#### **S-11 Storm Waves, Flooding and Seacliff Erosion**

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

supply. Prior to completion of a comprehensive shoreline protection plan designed for the area, interim protection devices may be allowed provided such devices do not encroach seaward of a string line of similar devices. [...]

**19.87.050 Criteria for granting coastal development permits.**

**The proposed development shall be permitted if found to satisfy the following criteria:**

- A. The proposed development conforms to the certified local coastal plan including coastal land use policies;
- B. For all development seaward of the nearest public highway to the shoreline; the proposed development meets standards for public access and recreation of Chapter 3 of the 1976 Coastal Act and regulations promulgated there under;
- C. The proposed development meets minimum criteria set forth in Sections 19.81.060, 19.82.050., 19.83.120., 19.84.050., and 19.86.100., of this title for site plans, conditional use permits, design review, variances, zoning classification and rezonings; and
- D. For all development involving the construction of a shoreline protective device, a mitigation fee shall be collected which shall be used for beach sand replenishment purposes. The mitigation fee shall be deposited in an interest-bearing account designated by the Executive Director of the California Coastal Commission and the city manager of Imperial Beach in lieu of providing sand to replace the sand a beach area that would be lost due to the impacts of any proposed protective structure.

In addition, the following Coastal Act policies are applicable to the subject proposal, and state:

Section 30210

In carrying out the requirement of Section 4 of Article X of the California Constitution, maximum access, which shall be conspicuously posted, and recreational opportunities shall be provided for all the people consistent with public safety needs and the need to protect public rights, rights of private property owners, and natural resource areas from overuse.

Section 30211

Development shall not interfere with the public's right of access to the sea where acquired through use or legislative authorization, including, but not limited to, the use of dry sand and rocky coastal beaches to the first line of terrestrial vegetation.



Section 30213

Lower cost visitor and recreational facilities shall be protected, encouraged, and, where feasible, provided. Developments providing public recreational opportunities are preferred.

Section 30220

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

The need for shoreline protection has been well established along the shoreline in Imperial Beach, and rock revetment has been the established form of protection for existing structures in the southern portion of Imperial Beach for many years. However, when reviewing projects for repairs to an existing revetment, the Commission has reviewed the need for any new rock, the impacts that new rock might have on public access and recreation, and potential alternatives to rock. In general, new development cannot be found consistent with the certified LCP or the public access and recreation policies of the Coastal Act if it has not been designed to minimize the amount of construction on beaches, and to eliminate or mitigate adverse impacts on local shoreline sand supply.

An engineering report submitted by the applicant indicates that the revetment is generally adequate for the purpose of protecting the existing condominium building on the site. However, stones on the revetment have rolled seaward such that the footprint is approximately 30 feet seaward of the property line, and there are three specific areas of the revetment which have deteriorated and are in need of repair, consisting of the replacement of the stray stones.

As noted above, the City of Imperial Beach has provided evidence that construction of a revetment in front of the subject site was approved in 1989 as part of a larger project that included construction of a 9-unit condominium on the site adjacent to the subject site to the north (1424 Seacoast Drive), and a rock revetment in front of both the subject site and 1424 Seacoast Drive. Plans obtained from the City indicate that the 1989 approval filled a gap in an existing revetment located north and south of the two sites. The revetment on either side of the lots ranged in elevation from 18 feet to 16 feet above Mean Sea Level (MSL). A string line drawn from the existing revetments on either side shows the proposed revetment in front of the two lots located approximately 26 feet seaward of the western private property line.

Thus, it appears that the subject revetment was properly permitted and constructed according to the approved design. The existing revetment is at its design elevation of 17 feet MSL, and, with the exception of the stray stones, is in line with the revetment on either side of the site. The proposed repairs will pull back the revetment to 25 feet seaward of the property line and will reduce the amount of encroachment on the public beach by approximately 600 sq.ft.

Consistent with the certified LCP, the proposed project involves minimal construction and will not result in the loss of any additional sandy beach area. However, the Commission is concerned that the proposed repairs extend the life of a revetment located on public property. Under the City's certified LCP, it is clear that a new revetment project on public property, or a project that involves additional encroachment on public beach, would be subject to a beach sand mitigation fee to mitigate for impacts to beach sand supply resulting from the revetment on the public beach. However, at the time the revetment was approved, the mitigation fee was not part of the City's LCP, and as such, no mitigation has ever been received for the impacts associated with the loss of beach area resulting from the revetment. Therefore, the proposed project raises the question of whether the mitigation fee should be applied now, given that the proposed maintenance will prolong the life of the revetment on the public beach and, while it remains, it precludes other options such as constructing a vertical wall on private property to protect the existing residential development.

In the case of the proposed project, although portions of the revetment will remain on public beach, the proposed repairs will reduce the amount of encroachment on the public beach, thereby increasing oceanfront land available for recreation and reducing the visual impacts of the existing revetment. Therefore, no additional impacts will result from the subject repairs and application of the beach sand mitigation fee at this time is not warranted. However, eventually, all of the existing revetments in Imperial Beach will require repair and maintenance, and depending on the extent of any proposed repairs and the location of the revetment, mitigation for the impacts on the beach and to public access and recreation may be required. The City of Imperial Beach has agreed to explore implementation of a sand mitigation fee for projects involving the maintenance of existing revetments where mitigation has not been required. The fee program may be applied to all existing revetments and proposed improvements to revetments that encroach onto public beach. Such a mitigation fee would serve to mitigate ongoing impacts by funding new sources of sand and would also serve as a disincentive to continued maintenance of encroachments on public beach. Over time, as redevelopment occurs in Imperial Beach, the amount of rock on public beach should decrease.

With regard to alternatives to the proposed project, the applicant did do an alternatives analysis looking at the feasibility of constructing a vertical seawall on the western property line. The cost of such a project is estimated at \$320,000, compared with the \$2,500 cost of the proposed repairs. The applicant's study estimates that the revetments on the adjacent properties would need to transition down in front of the wall, requiring a 20-foot rock slope on either side of the wall. Thus, only the middle 80 feet of the wall would not have some stones seaward of it.

Although this alternative would substantially reduce the amount of private encroachment on public beach, given that the existing revetment is properly permitted and the improvement over the current situation that the proposed repairs would represent, requiring the construction of a vertical seawall is not appropriate at this time. Nevertheless, the Commission would like to emphasize that the continuation of private

shoreline protection on public beach should not be considered a long-term, permanent solution, and that when beachfront properties redevelop, alternatives forms of shoreline protection that do not encroach on public property must be considered.

To ensure that the newly repaired revetment does not migrate further onto public beach, Special Conditions #1 and #2 have been added. Special Condition #1 requires the applicant to submit final plans documenting the height and extent of the permitted revetment and tied into identified, stable monuments. With these plans, long-term annual monitoring required by Special Condition #2 will assess whether any additional beach encroachment occurs in the future due to settling or movement of the existing revetment. The monitoring will identify damage or changes to the revetment such that repair and maintenance can be completed in a timely manner to avoid further encroachment of the revetment on the public beach. Special Condition #4 requires that the applicants maintain the existing revetment in its approved state, until the revetment can be removed or relocated under an approved coastal development permit.

To reduce the project's impacts on coastal access and limit the disruption of the recreational uses, Special Condition #3 requires the applicant to submit detailed plans identifying the specific location of staging and storage areas. Work is prohibited on any weekend between Memorial Day weekend and Labor Day of any year.

Also, due to the inherent risk of shoreline development, Special Condition #5 requires the applicant to waive liability and indemnify the Commission against damages that might result from the proposed development. Special Condition #6 states that the conditions placed on the project by the City of Imperial Beach pursuant to an authority other than the Coastal Act remain in full force and effect. In order to assure that future owners of the property receive notice of the conditions of this permit, Special Condition #7 requires that the terms and conditions of this permit be recorded as a deed restriction against the residential property.

In summary, the proposed repairs would occur to an existing revetment, a portion of which is currently located on public property. However, the project would relocate existing riprap that has migrated out onto the beach, tightening up the deteriorated revetment and returning it to a configuration consistent with the originally approved revetment. As conditioned to require annual monitoring and maintenance of the existing revetment, the proposed project will not adversely impact public access or recreation. Therefore, as conditioned, the Commission finds the project consistent with the City of Imperial Beach Local Coastal Program and the public access and recreation policies of the Coastal Act.

3. Local Coastal Planning. Section 30604(a) also requires that a coastal development permit shall be issued only if the Commission finds that the permitted development will not prejudice the ability of the local government to prepare a Local Coastal Program (LCP) in conformity with the provisions of Chapter 3 of the Coastal Act. In this case, such a finding can be made.

The subject site is zoned and designated for open space use in the certified Imperial Beach Land Use Plan. The certified Imperial Beach LCP contains policies that address shoreline protective devices, the importance of recreational land, and protection and improvement of visual access to the shoreline. As described above, the repairs will bring the existing revetment into conformance with the revetment as previously approved by the City. Special Condition #5 advises the applicant that the conditions of the subject coastal development permit are in addition to the conditions required by the City of Imperial Beach and does not have any effect on conditions imposed by the City of Imperial Beach for the subject development. As conditioned, the proposed development is consistent with the public access policies of the Coastal Act and the certified LUP. Therefore, the proposed development, as conditioned, is consistent with the certified LCP and the public access policies of Chapter 3 of the Coastal Act.

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

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

The proposed project has been conditioned in order to be found consistent with the shoreline protection policies of the City of Imperial Beach certified LCP and the public access and recreation policies of the Coastal Act and the City LCP. Mitigation measures, including conditions requiring annual monitoring and maintenance of the revetment, 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 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. Interpretation. Any questions of intent or interpretation of any condition will be resolved by the Executive Director or the Commission.
4. 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.
5. 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.

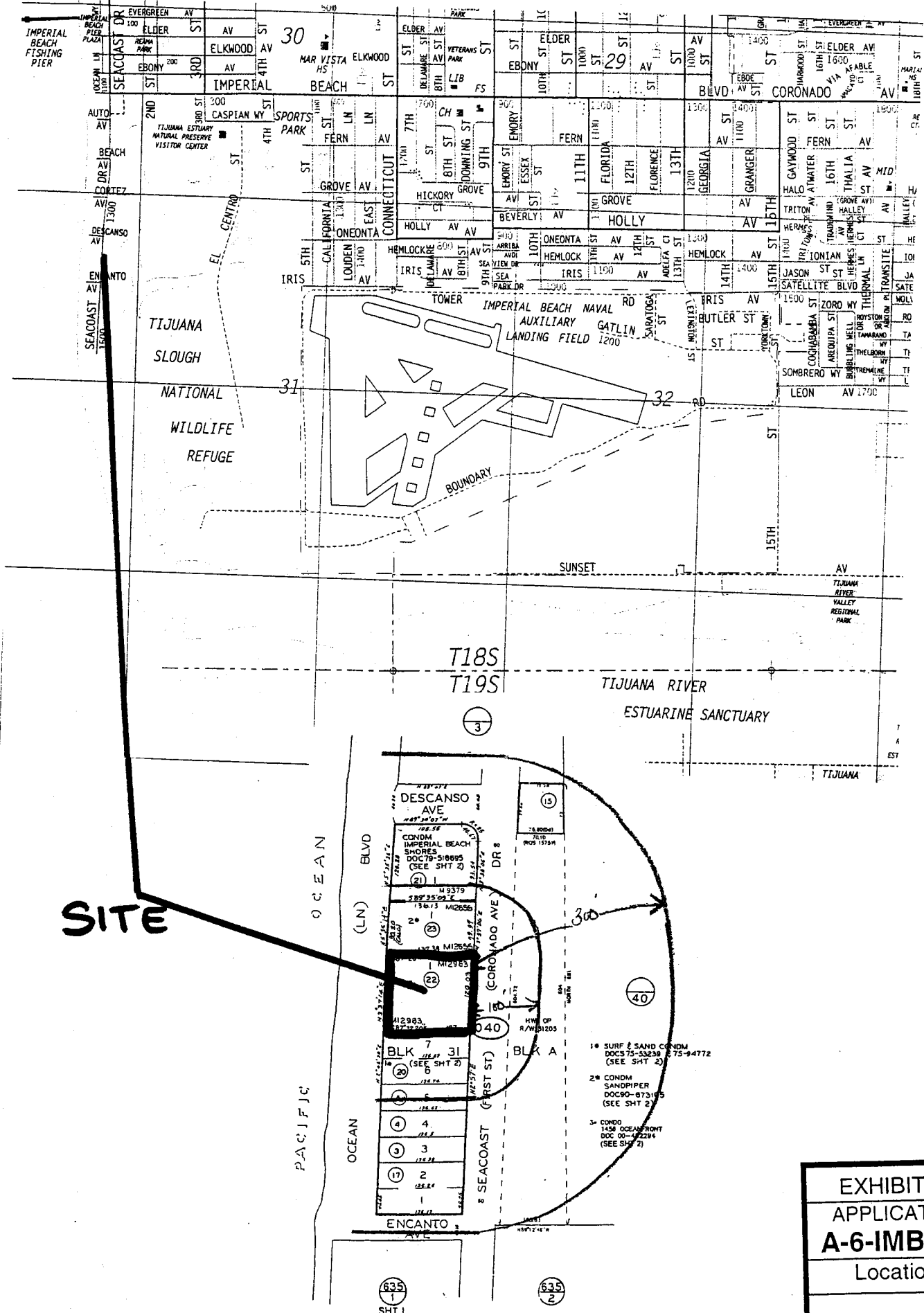
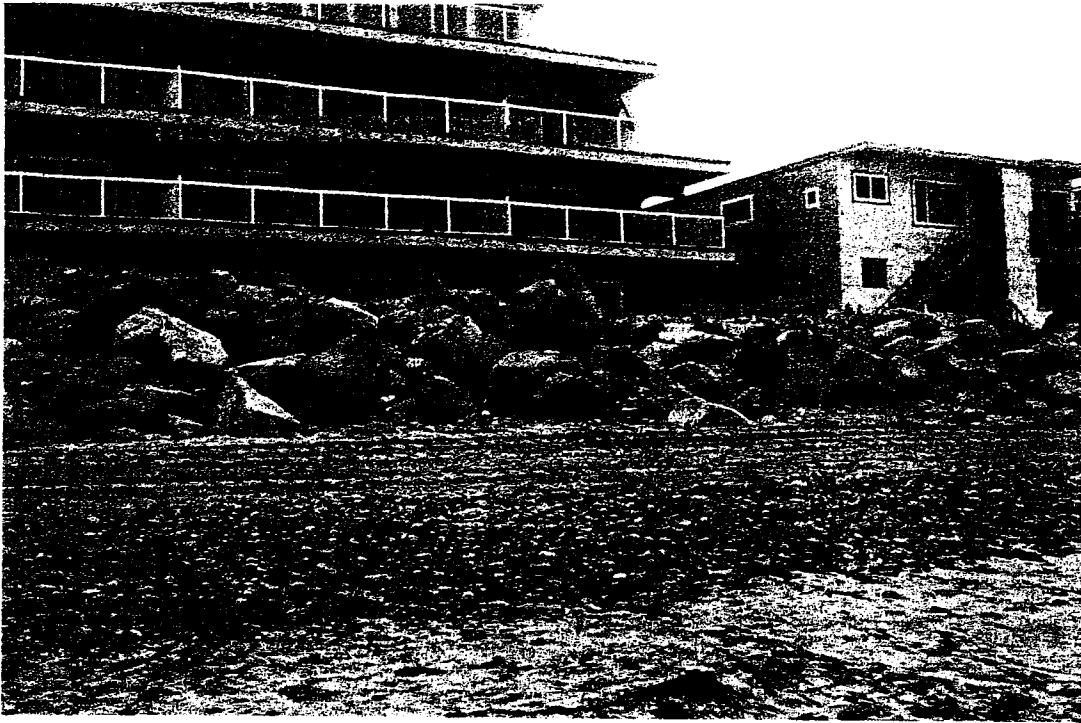


EXHIBIT NO. 1  
 APPLICATION NO.  
**A-6-IMB-04-152**  
 Location Map

SE SKELLY ENGINEERING



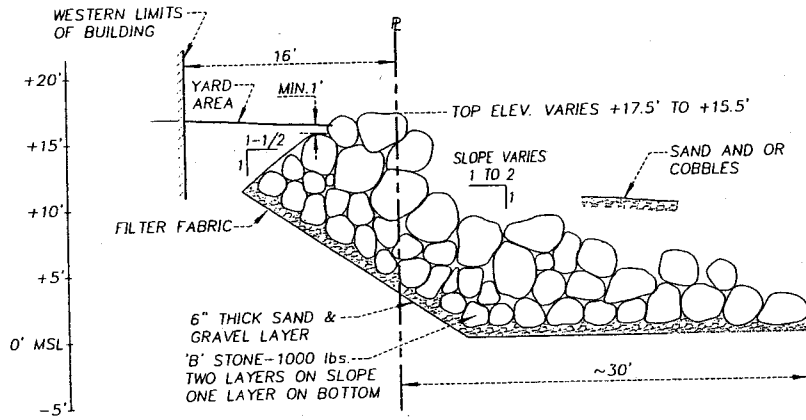
Photograph 1. Subject revetment June 11, 2003, looking south.



Photograph 2. Subject revetment June 11, 2003, looking north.

EXHIBIT NO. 2
APPLICATION NO.
<b>A-6-IMB-04-152</b>
Site Photos
 California Coastal Commission

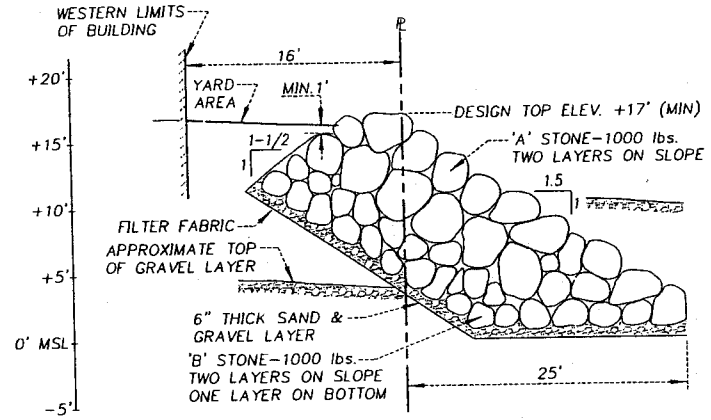
FIGURE 1



EXISTING CONDITIONS

SCALE: 1"=10'

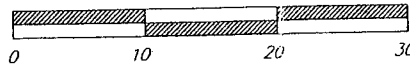
FIGURE 2



FROM WOODWARD CLYDE 1989

PERMITTED DESIGN PROFILE

SCALE: 1"=10'



<p>California Coastal Commission</p>	Site Plan
	Existing & Proposed
	A-6-IMB-04-152
	APPLICATION NO.
EXHIBIT NO. 3	

DRAFTING BY: CHUVAH  
 PROFESSIONAL SEAL  
 GeoSoils, Inc.  
 TITLE