

CALIFORNIA COASTAL COMMISSION

SAN DIEGO AREA
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RECORD PACKET COPY



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49th Day: June 17, 2005
180th Day: October 16, 2005
Staff: DL-SD
Staff Report: May 16, 2005
Hearing Date: June 7-10, 2005

REGULAR CALENDAR
STAFF REPORT AND PRELIMINARY RECOMMENDATION

Application No.: 6-05-019

Applicant: Friends of Famosa Slough Agent: Merkel & Associates
 City of San Diego

Description: Restoration of a portion of Famosa Slough including the creation of 2.22 acres of southern coastal salt marsh and mudflat, 1.03 acres of native scrub vegetation, and 0.12 acre of public access trails. Enhanced wetland and upland habitat would be created by removing approximately 12,000 cubic yards of fill dirt, non-native grasslands and fragmented southern coastal salt marsh to lower the existing site to salt marsh grades. Open water channels would be cut into the newly created marsh, creating islands for birds and improving water circulation.

Site: Southeastern side of Famosa Slough, near intersection of West Point Loma Boulevard and Famosa Boulevard, Peninsula Community, San Diego, San Diego County. APN# 449-870-03

Substantive File Documents: Certified City of San Diego LCP; Famosa Slough Enhancement Plan (November 1993); "Famosa Slough Enhancement projects – Jurisdictional Wetland Delineation Report" by Merkel & Associates, dated February 6, 2003.

STAFF NOTES:

Summary of Staff's Preliminary Recommendation: Staff is recommending approval of the proposed restoration activities with special conditions addressing the submittal of final approvals from the City, the disposal of graded material, staging plans, and compliance with the wetland delineation report. The project is a restoration activity that will enhance the habitat of Famosa Slough. The minor impacts to existing salt marsh habitat will result in 2.2 acres of additional wetlands and 1.03 acres of upland native scrub habitat. All of the affected wetland areas will be higher functioning after the restoration than before the project, and the project is self-mitigating for the temporary impacts. Chapter 3 of the Coastal Act is the standard of review for the project.

I. PRELIMINARY STAFF RECOMMENDATION:

The staff recommends the Commission adopt the following resolution:

MOTION: *I move that the Commission approve Coastal Development Permit No. 6-05-19 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 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 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. Site Development and Other Permits. PRIOR TO THE ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicant shall submit to the Executive Director for review and written approval, copies of the Site Development Permit from the City of San Diego. All other required local, state or federal discretionary permits for the development authorized by CDP #6-05-19, shall be submitted to the Executive Director for review and written approval, prior to the commencement of construction. The applicant shall inform the Executive Director of any changes to the project required by the City or other such bodies. Such changes shall not be incorporated into the project until the applicant obtains a Commission amendment to this permit, unless the Executive Director determines that no amendment is legally required.

2. Disposal of Graded Spoils. PRIOR TO THE ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicant shall identify the location for the disposal of graded spoils. If the site is located within the coastal zone, a separate coastal development permit or permit amendment shall first be obtained from the California Coastal Commission or its successors in interest.

3. Staging Areas/Public Access. PRIOR TO THE ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicant shall submit to the Executive Director for review and written approval, detailed plans incorporated into the construction bid documents for the location of staging areas and of access corridors to the construction sites. The plans shall include, at a minimum, the following:

- a. No overnight storage of equipment, construction materials, or excavated materials shall occur within wetlands or native vegetation areas or public parking spaces. Stockpiles shall be located away from drainage courses, covered at all times and contained with runoff control measures.
- b. Storage and staging areas shall be located in a manner that has the least impact on vehicular and pedestrian traffic along West Point Loma Blvd.
- c. No work shall occur along West Point Loma Blvd. on weekends or holidays between Memorial Day weekend and Labor Day of any year.
- d. The applicant shall submit evidence that the approved plans/notes have been incorporated into construction bid documents. Staging site(s) shall be removed and/or restored immediately following completion of the development; any excavated materials must be stored outside of wetlands and native vegetation areas.

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. Mitigation & Minimization of Impacts: The applicant shall comply with all requirements contained in the "Famosa Slough Enhancement projects – Jurisdictional Wetland Delineation Report" by Merkel & Associates, dated February 6, 2003, and the project plans by Terra Costa Consulting Group submitted and date-stamped March 7, 2005, for the West Point Loma Boulevard Marsh Restoration. Any additional mitigation or monitoring reports performed for the project shall be submitted to the Executive Director.

Any proposed changes to the approved plans or the wetlands delineation report shall be reported to the Executive Director. No changes to the approved plans or restoration plan shall occur without an amendment to this coastal development permit unless the Executive Director determines that no amendment is legally required.

IV. Findings and Declarations.

The Commission finds and declares as follows:

1. Detailed Project Description and History. The proposed project is the West Point Loma Marsh Enhancement Area Project (WPLMEA) at Famosa Slough. The WPLMEA is an approximately 4-acre field of non-native grassland with fragmented salt marsh fringing the low elevations. The project consists of enhancing wetland and upland habitat by removing approximately 12,000 cubic yards of existing fill dirt, non-native grasslands and fragmented southern coastal salt marsh to lower the existing site to an elevation that will support salt marsh habitat. Open water channels would be cut into the newly created marsh, creating islands for birds and improving water circulation. Native uplands would be planted on berms created from approximately 7,000 cubic yards of excavated fill materials. Berms created in upland areas would serve to buffer the wetlands from urban encroachment and would be planted with native upland vegetation. Trails and interpretive signage would also be located on the upland berm areas. In total, the project would result in the creation of 2.22 acres of southern coastal salt marsh and mudflat, 1.03 acres of native uplands dominated by coastal dune scrub vegetation, and 0.12 acre of public access trail.

Famosa Slough is an approximately 37-acre wetland located partially within the Peninsula Community and partially within Mission Bay Park; the subject site is in the Peninsula Community, adjacent to and southeast of the intersection of West Point Loma Boulevard and Famosa Boulevard. The site is designated as an open space and preserve area in the San Diego County Multiple Species Conservation Plan (MSCP).

The project is part of the Famosa Slough Enhancement Plan, a multi-faceted, phased enhancement plan that was reviewed by the Commission and approved in concept in 1996, pursuant to Coastal Development Permit #6-95-128. The Commission at that time gave specific approval for several relatively small components (fencing, trails, signage and exotics removal) and one major feature, installation of new hydraulic gates to regulate tidal flow in the slough. The Commission indicated that future improvements made under the plan would require separate action by the Commission in the future, since plans for those components were not available when the overall plan was presented, but supported the overall enhancement goals of the plan. Recently approved projects associated with the Famosa Slough Enhancement Plan include CDP#s 6-99-82 for construction of three wetland treatment ponds at the southern end of Famosa Slough, 6-02-117 for creation of a sedimentation basin and salt marsh habitat, and 6-04-10 for extension of an existing drainage culvert and installation of a sheet pile headwall.

Famosa Slough is a tideland area and is thus within the Coastal Commission's area of original permit jurisdiction. Chapter 3 of the Coastal Act is the standard of review, with the certified LCP used as guidance.

2. Wetlands/Sensitive Biological Resources/Water Quality. The following Chapter 3 policies of the Coastal Act apply to the subject proposal and state, in part:

Section 30230

Marine resources shall be maintained, enhanced, and where feasible, restored. Special protection shall be given to areas and species of special biological or economic significance. Uses of the marine environment shall be carried out in a manner that will sustain the biological productivity of coastal waters and that will maintain healthy populations of all species of marine organisms adequate for long-term commercial, recreational, scientific, and educational purposes.

Section 30231

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, and minimizing alteration of natural streams.

Section 30233

(a) The diking, filling, or dredging of open coastal waters, wetlands, estuaries, and lakes shall be permitted in accordance with other applicable provisions of this division, where there is no feasible less environmentally damaging alternative, and where feasible mitigation measures have been provided to minimize adverse environmental effects, and shall be limited to the following:

- (1) New or expanded port, energy, and coastal-dependent industrial facilities, including commercial fishing facilities.
- (2) Maintaining existing, or restoring previously dredged, depths in existing navigational channels, turning basins, vessel berthing and mooring areas, and boat launching ramps.
- (3) In wetland areas only, entrance channels for new or expanded boating facilities....
- (4) In open coastal waters, other than wetlands, including streams, estuaries, and lakes, new or expanded boating facilities and the placement of structural pilings for public recreational piers that provide public access and recreational opportunities.

- (5) Incidental public service purposes, including but not limited to, burying cables and pipes or inspection of piers and maintenance of existing intake and outfall lines.
- (6) Mineral extraction, including sand for restoring beaches, except in environmentally sensitive areas.
- (7) Restoration purposes.
- (8) Nature study, aquaculture, or similar resource dependent activities.

Section 30240

- (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 wetlands delineation report submitted with the application describes the philosophy behind the Famosa Slough Enhancement Plan (FSEP). The FSEP was developed in accordance with an adaptive management concept, which was designed to be self-mitigating, with far greater wetland restoration and enhancement than impacts. Impacts to wetlands are allowed for in the FSEP, however impacts are to be minimized by design and the residual impacts effectively offset by the restoration and enhancement gains. The FSEP was meant to be implemented in phases, both for reasons of available funding and to effectively implement the adaptive management concepts governing the FSEP. For this reason the FSEP is being implemented in a manner that ensures that some restoration or enhancement of wetlands commences concurrent or ahead of actions that would result in impacts to wetlands. By ensuring that there is always a net surplus of habitat improvements, the FSEP implementation phasing can reasonably absorb elements with incremental losses of wetlands. The WPLMRA was designated as a restoration area in the FSEP and is a major component of the restoration of the Famosa Slough wetlands.

The WPLMEA is an approximately 4-acre field of mostly non-native grassland and other non-native upland vegetation, with fragmented salt marsh and other wetlands (salt pan and subtidal) fringing the low elevations. In total, the site contains approximately 0.95 acres of wetlands. The soils of the area are made up of mostly fill dirt and debris overlying marsh muds. The WPLMRA is connected to tidal influence through the San Diego River Channel. The historic restriction of tidal circulation to the Slough by dike construction has reduced the coverage of salt marsh habitats within the Slough and urban encroachment has eliminated native upland habitats that formerly surrounded the wetland.

The project consists of regrading the upland area to lower the existing site to salt marsh elevation, planting new saltmarsh and saltmarsh transition vegetation, cutting open water channels through the newly created marsh to form islands for birds and improve water circulation, building berms to buffer the wetlands from urban encroachment, planting the berms with native habitat (maritime succulent scrub) and constructing an ADA compliant public access trail with interpretive signage through the upland berm area.

As cited above, under the Coastal Act, dredging and/or filling wetlands is severely constrained. Coastal Act Section 30233(a) sets forth a three-part test for all projects involving the fill of coastal waters and wetlands. These are:

- 1) That the project is limited to one of the eight stated allowable uses;
 - 2) That the project has no feasible less environmentally damaging alternative;
- and,
- 3) That adequate mitigation measures have been provided for all unavoidable impacts to minimize adverse environmental effects.

In this particular case, the proposed development meets the above requirements. As a restoration project, the development is a permitted use in wetlands under Section 30233(7).

In total, the project would result in approximately 2.22 acres of southern coastal salt marsh and mudflat, 1.03 acres of native uplands, and 0.12 acre of public access trail. These habitats would be developed where 0.95 acres of degraded wetland and 2.42 acres of non-native grassland and disturbed habitat currently exist. In order to create the wetlands and native uplands, the project would directly impact degraded southern coastal salt marsh, subtidal, non-native vegetation, disturbed wetland, and non-native grasslands habitats. Direct impacts would result from construction activity and permanent habitat changes.

There is no way to complete the restoration project without impacting a small amount of existing disturbed lower coastal salt marsh habitat, since the proposed grading is necessary to lower existing elevations due to sediment deposits in that area to historic levels so that the tidal influences which are necessary for the re-establishment of salt marsh habitat in the restoration can be successfully implemented. However, no wetland habitat will be lost; rather, the 0.95 acres will be disturbed during the restoration activities and portions will be converted from one wetland habitat type (degraded), to other wetland habitat types (salt marsh, salt pan/mudflat, salt marsh transition). The net effect will be an increase of 1.27 ac of wetlands for a total post-project wetland acreage of 2.22 acres. Impacts have been minimized to the maximum extent feasible, and only that grading necessary to restore habitat is proposed. In all cases the impacts to existing sensitive wetland habitats would result in habitat enhancement. The Commission's ecologist has reviewed the project and concurs that all of the affected wetland areas will be higher functioning after the restoration than before the project, and that the project is appropriate restoration and self-mitigating for the temporary impacts. The project has also been

reviewed and approved by the Army Corps of Engineers and the Regional Water Quality Control Board. The proposed project is also consistent with the San Diego MSCP.

The project does include construction of a public access trail that at some points, would be as close as 30 feet from the newly created high salt marsh area (and closer to the salt marsh transition). The purpose of establishing a buffer area between wetlands and development is to reduce the amount of human and domestic animal intrusion into sensitive vegetation, to reduce the impact of human activity on native wildlife species, to provide an area of land which can filter drainage and runoff from developed areas before it impacts the wetlands, and to provide an upland resting retreat area for some wetland animal species.

In general, the Commission has permitted trails and other passive recreational uses within the upper one-half of the required wetland buffer. However, there are particular circumstances where trails are located much closer because of historical use or site constraints. In this particular case, the project has been designed with several topographic features designed to protect the wetlands and still allow access to the site. A berm will be created along West Point Loma Boulevard to block noise and light from street. A flat bench will be created for the public access trail, and then another berm will be located between the public access trail and the wetlands to minimize human disturbance impacts from the trail. The proposed project is a community-driven restoration project, not mitigation for impacts to existing habitat, and public access to Famosa Slough for bird watching and passive recreational uses is a high priority for the applicants and the community. The Commission's ecologist has determined that the provision and location of the trail will not offset the positive environmental benefits of the project.

The small areas of wetland habitat in the project area are used for foraging and loafing by waterfowl and shorebirds. Habitat for these activities is available throughout the Slough and these birds may temporarily move to other areas within the Slough during construction activities. In addition, salt marsh habitat within the project area is currently of low quality and no nesting sensitive birds species are found in these or adjacent areas of the Slough. Therefore, in this particular case, construction does not need to be limited to outside of breeding bird season. Following construction, waterfowl and shorebirds will have a greater amount of and higher quality of habitat available including protected islands that are isolated from most mammalian predators.

The applicant is proposing a variety of conditions to ensure that the proposed project will not have any impact on the existing habitat of Famosa Slough, including erosion control measures, temporary construction barriers, and the presence of a biological monitoring during construction. Special Condition #4 requires that the project be implemented consistent with the requirements of the wetland delineation report. As the project is not a mitigation project, specific performance criteria for the proposed restoration are not required. The applicant is proposing to perform maintenance of the site such as hand-watering until plant establishment and removal of exotics.

Because the applicant has not yet received a final Site Development Permit from the City of San Diego, Special Condition #1 requires submittal of this approval prior to issuance of the permit. Any other required local, state or federal agencies must be submitted to the Commission prior to commencement of construction. Because some of the graded fill material may not be used on site, Special Condition #2 requires identification of the off-site export site.

In summary, the Commission finds that the proposed restoration project is a permitted use within a wetland pursuant to Section 30233 of the Coastal Act, impacts to existing coastal salt marsh have been minimized to the maximum extent feasible, and will be adequately compensated by the proposed creation and restoration of 2.22 acres of wetlands and 1.03 acres of native upland habitat. The project has been reviewed and approved by the Army Corps of Engineers and the Regional Water Quality Control Board. Therefore, the Commission finds that the proposed development, as conditioned, is consistent with the cited resource protection policies of the Coastal Act.

3. Public Access. Many policies of the Coastal Act address the provision, protection and enhancement of public access opportunities, particularly access to and along the shoreline. In the subject inland area, the following policies are most applicable, and state, in part:

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 30213

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

Section 30223

Upland areas necessary to support coastal recreational uses shall be reserved for such uses, where feasible.

Famosa Slough is within the highly urbanized Point Loma/Ocean Beach area of San Diego, and West Point Loma Boulevard, which separates the main body of the slough from the northern channel connecting with the San Diego River, is a major coastal access route to the municipal beaches west of the site. Implementation of the proposed development will not require any closures of West Point Loma Boulevard, nor will it affect beach access in any way.

There is no existing public access on the project site, but other areas of the Slough contain public trails and interpretive signage and provide a low-cost form of public recreation. Access to the public trails in other parts of the Slough will remain open during construction, but the actual area surrounding the construction site will be closed and fenced. There is adequate parking available for slough visitors along Famosa Boulevard and at several cul-de-sacs along the western edge of the slough and no construction vehicle parking will take place on public streets. The project will improve public access and recreation through creation of a new public trail. Special Condition #3 requires submittal of a staging plan prohibiting work from taking place along West Point Loma Boulevard on weekends or holidays during the summer. Therefore, the Commission thus finds that the proposed project will not have an adverse impact on public access, consistent with the cited access policies of the Coastal Act.

5. Visual Resources. The following policy of the Coastal Act addresses visual resources, and states, in part:

Section 30251

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 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 subject site is located within a highly urbanized area of the City of San Diego and provides a needed area of open space. The proposed development will remove existing non-native species and replace them with native marsh and upland habitat. Upon completion of the project, the overall area will not look significantly different than it does today, but will be more natural in appearance with the removal of exotic plants and the change in elevation. Construction impacts on visual resources will be short term and unavoidable. Therefore, the Commission finds that the proposed development is consistent with Section 30251 of the Act.

6. Local Coastal Planning. Famosa Slough is designated as Open Space in the certified Peninsula Community Plan and zoned as Park. The proposed improvements are fully consistent with those designations. The site is within the Commission's area of original jurisdiction, and is being reviewed under Chapter 3 of the Coastal Act. The preceding findings have demonstrated that the proposal, as conditioned, is consistent with all applicable Chapter 3 policies. The project is consistent with the Famosa Slough Enhancement Plan. The project has received all necessary permits from other state and federal agencies, including the Army Corps of Engineers and the Regional Water Quality Control Board. Therefore, the Commission finds that approval of the development, as conditioned, should not prejudice the ability of the City of San Diego to continue implementation of their fully certified LCP.

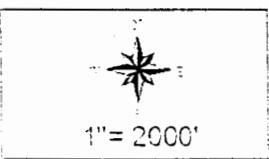
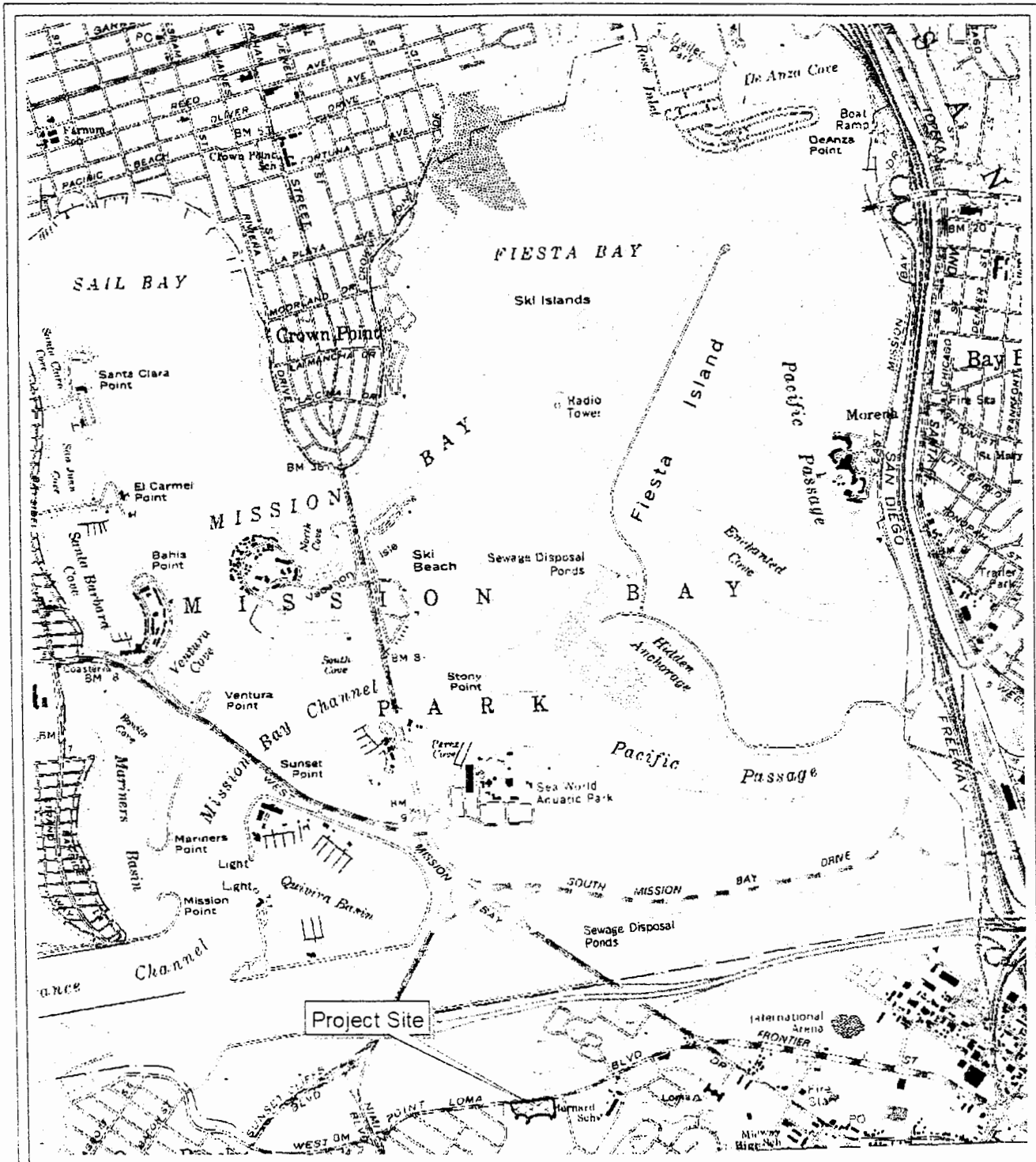
7. Consistency with the California Environmental Quality Act (CEQA). Section 13096 of the Commission's Code of Regulations requires Commission approval of coastal development permits to be supported by a finding showing the permit to be consistent with any applicable requirements of the California Environmental 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.

As discussed herein, the proposed project will not cause significant adverse impacts to the environment. Specifically, the project, as conditioned, has been found consistent with the biological and marine resources, water quality, visual resource and public access policies of the Coastal Act. There are no feasible alternatives or mitigation measures available which would substantially lessen any significant adverse impact which the activity might have on the environment. Therefore, the Commission finds that the proposed project is the least environmentally damaging feasible alternative and is found consistent with the requirements of the Coastal Act to conform to CEQA.

STANDARD CONDITIONS:

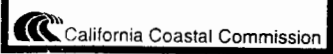
1. Notice of Receipt and Acknowledgment. The permit is not valid and development shall not commence until a copy of the permit, signed by the permittee or authorized agent, acknowledging receipt of the permit and acceptance of the terms and conditions, is returned to the Commission office.
2. Expiration. If development has not commenced, the permit will expire two years from the date on which the Commission voted on the application. Development shall be pursued in a diligent manner and completed in a reasonable period of time. Application for extension of the permit must be made prior to the expiration date.
3. 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.

M&A =96-074-03



Project Vicinity Map
 West Point Loma Blvd. Marsh Enhancement
 Source: USGS 7.5' La Jolla, CA Quadrangle

EXHIBIT NO. 1
APPLICATION NO.
6-05-19
Location Map



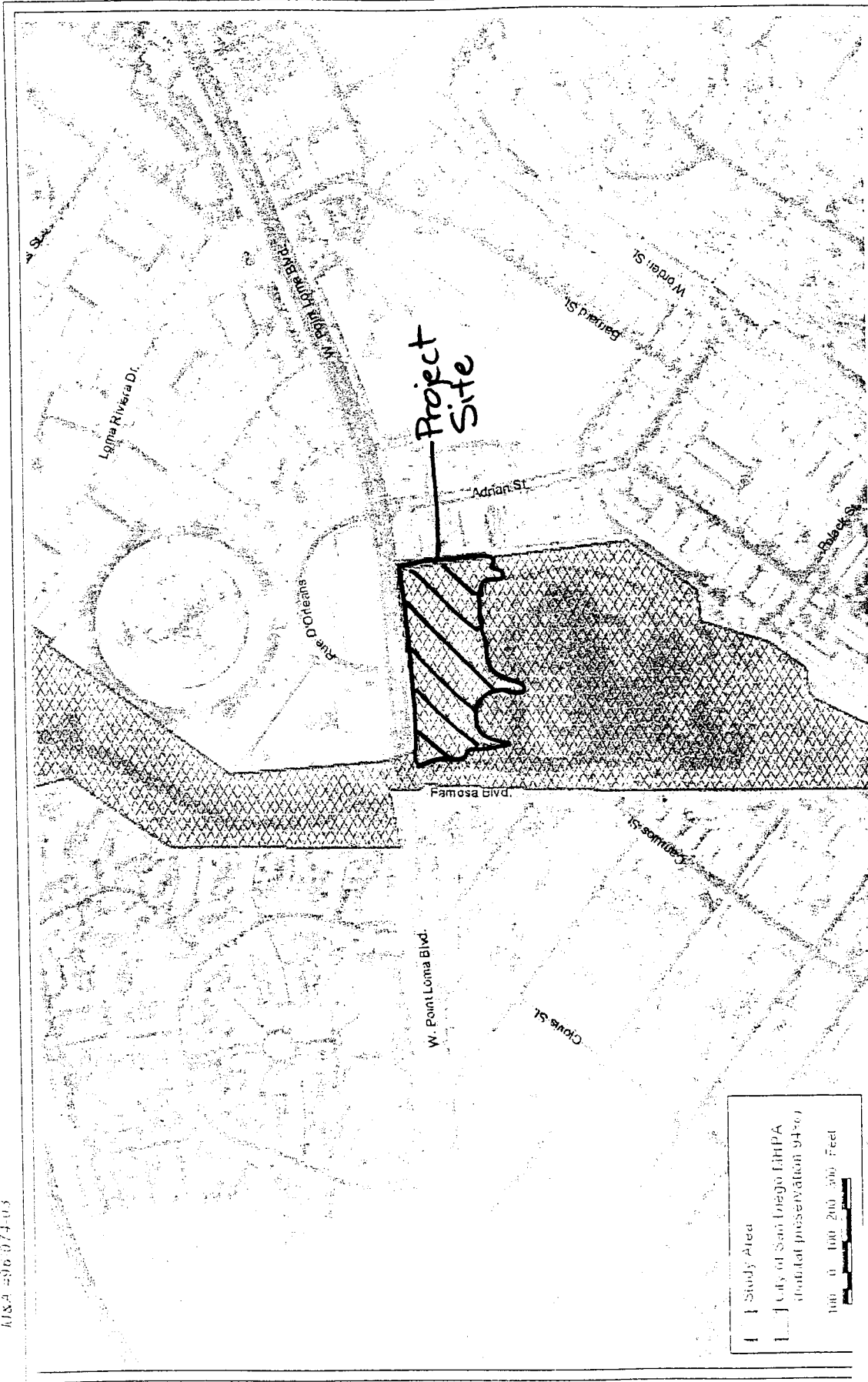
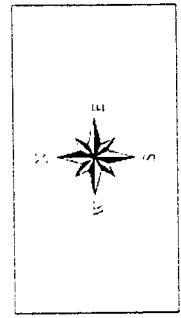


EXHIBIT NO. 2
APPLICATION NO.
6-05-19
Detail Map



City of San Diego MSCP - MHPA in Project Vicinity
West Point Loma Marsh Enhancement Area

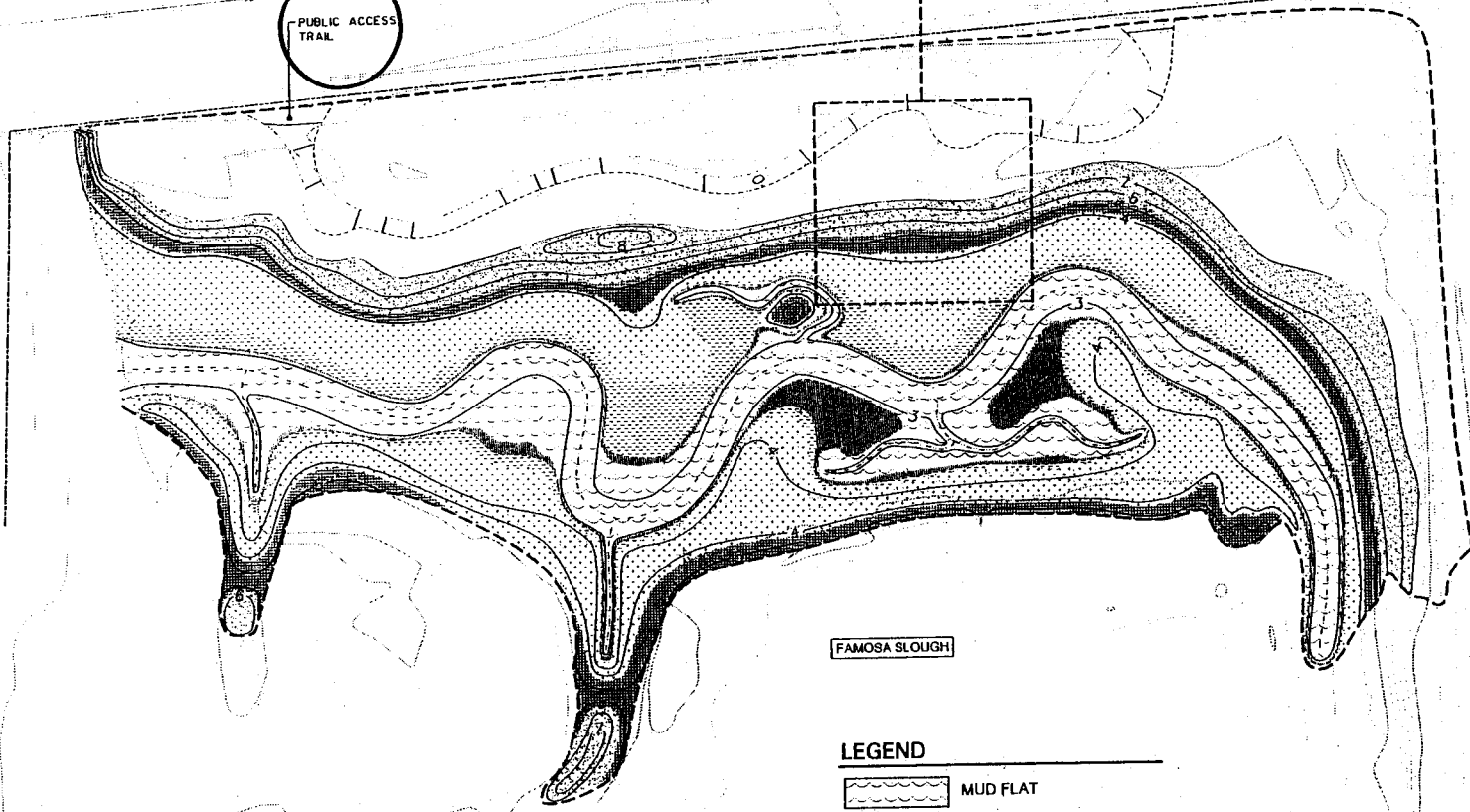
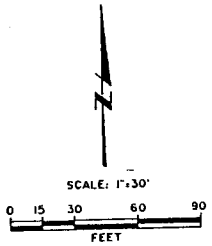
Figure 2

Merkel & Associates, Inc

W POINT LOMA BLVD

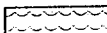
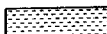
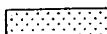

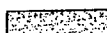
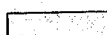
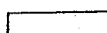
PUBLIC ACCESS TRAIL

DETAIL AREA, SEE SHEET C-7 FOR PLANTING TABLE AND DETAILS.



FAMOSA SLOUGH

LEGEND

-  MUD FLAT
-  LOW SALT MARSH
-  MID SALT MARSH
-  HIGH SALT MARSH
-  SALT MARSH TRANSITION
-  COSTAL DUNE SCRUB
-  PUBLIC ACCESS TRAIL

NOTE:
1. SEE SHEET C-7 FOR PLANTING TABLE AND DETAILS.

TERRACOSTA CONSULTING GROUP, INC.
ENGINEERS & DESIGNERS
4435 SAURIPPY CANYON ROAD, SUITE 100
SAN DIEGO, CALIFORNIA 92123
(858) 573-8900



C-4

PLANTING & IRRIGATION			
WEST POINT LOMA BLVD MARSH RESTORATION			
CITY OF SAN DIEGO, CALIFORNIA			
RECEIVED			
FOR CHECKED	DATE	BY	DATE
REVISION		APPROVED	DATE
ORIGINAL	TCG		
MAR 07 2005			
CONTRACTOR		DATE STARTED	DATE COMPLETED
INSPECTOR			

CALIFORNIA 00000-6-D
COASTAL COMMISSION
SAN DIEGO COAST DISTRICT

California Coastal Commission

EXHIBIT NO. 3
APPLICATION NO.
6-05-19
Site Plan