

CALIFORNIA COASTAL COMMISSION

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Filed: 6/14/2005
49th Day: 8/2/2005
180th Day: 12/11/2005
Staff: CP-LB
Staff Report: 8/25/2005
Hearing Date: September 16, 2005
Commission Action:

**STAFF REPORT: REGULAR CALENDAR****APPLICATION NUMBER:** 5-05-178**APPLICANTS:** Lenny & Michael Targon **AGENT:** Michael Hricak, Architect**PROJECT LOCATION:** 3009 Ocean Front Walk, Venice, City of Los Angeles.

PROJECT DESCRIPTION: Major remodel and enlargement of an existing two-story, 2,280 square foot duplex with three parking spaces on a beachfront lot, resulting in a three-story, 35-foot high (with one 40-foot high roof access structure), 4,030 square foot duplex with an attached two-car garage and one guest parking space.

Lot Area	2,520 square feet
Building Coverage	1,820 square feet
Pavement Coverage	700 square feet
Landscape Coverage	0 square feet
Parking Spaces	3
Zoning	C1-1
Plan Designation	Community Commercial
Ht above final grade	35 feet (plus 40-foot high roof access)

LOCAL APPROVAL: City of Los Angeles Planning Department Approval, Case No. ZA-2004-7806 (ZAA), 4/6/2005.

SUMMARY OF STAFF RECOMMENDATION

Although the proposed project would preserve a non-conforming parking situation on the site (the proposed project provides three on-site parking spaces instead of four for the two residential units), staff is recommending that the Commission approve the coastal development permit application because the proposed development is the renovation of an existing structure and not a new building. According to the applicants, more than half of the exterior walls of the existing duplex will be retained in the renovated structure, and the on-site parking supply will not be reduced from what currently exists (three spaces). The recommended special conditions of approval would ensure that the applicants would not retain any rights to the non-conforming parking in the event that more than fifty-percent of the exterior walls of the duplex are removed during the project. The recommended special conditions also address permit compliance, water quality, residential density, building height and provision of three on-site parking spaces. The applicants agree with the recommendation. **See Page Two for Motion.**

SUBSTANTIVE FILE DOCUMENTS:

1. City of Los Angeles certified Venice Land Use Plan, 6/14/2001.
2. Coastal Development Permit 5-95-050 (Snipper: 2811 Ocean Front Walk).
3. Coastal Development Permits 5-01-267 & 268 (Villa Lido: 2201-2205 OFW).
4. Coastal Development Permit 5-03-520 (Ennis: 2911 OFW).
5. Coastal Development Permit 5-03-068 (Farid: 4615 OFW).
6. Coastal Development Permits 5-04-027 & 028 (Venice Lofts: 619-701 OFW).
7. Coastal Development Permit 5-04-150 (Binder: 2703 OFW).

STAFF RECOMMENDATION:

The staff recommends that the Commission adopt the following resolution to **APPROVE** the coastal development permit application with special conditions:

MOTION: *"I move that the Commission approve with special conditions Coastal Development Permit 5-05-178 per the staff recommendation."*

Staff recommends a **YES** vote which would result in the adoption of the following resolution and findings. An affirmative vote by a majority of the Commissioners present is needed to pass the motion.

I. Resolution: Approval with Conditions

The Commission hereby **APPROVES** a coastal development permit for the proposed development and adopts the findings set forth below on grounds that the development as conditioned will be in conformity with the policies of Chapter 3 of the Coastal Act and will not prejudice the ability of the local government having jurisdiction over the area to prepare a Local Coastal Program conforming to the provisions of Chapter 3 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

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 this permit is reported to the Commission. 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.

III. Special Conditions

1. Approved Development - Permit Compliance

Coastal Development Permit 5-05-178 approves the renovation and enlargement of an existing duplex with the retention of more than fifty-percent (50%) of the existing exterior walls. All development must occur in strict compliance with the proposal as set forth in the application, subject to the special conditions. Any proposed change or deviation from the approved plans shall be submitted to the Executive Director to determine whether an amendment to this permit is necessary pursuant to the requirements of the Coastal Act and the California Code of Regulations. No changes to the approved plans shall occur without a Commission amendment to this coastal development permit unless the Executive Director determines that no amendment is required.

2. Termite Inspection

PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicants shall submit, for the review and approval of the Executive Director, a termite inspection report, prepared by a licensed professional, indicating the degree, if any, of termite damage that exists within the existing structure that is the subject of the permit. The termite inspection report shall also be submitted to the City of Los Angeles Building Department for review and comment.

If the termite inspection report indicates that additional demolition (beyond fifty-percent of the exterior walls) may be necessary in order for the structure to meet building and safety standards, the applicants shall submit a complete amendment request application or a complete application for a new coastal development permit. Whether an amendment or permit application is submitted shall be determined by the Executive Director. The application shall address the issue of revisions to the project due to the need for additional demolition. ***Development may not proceed while an amendment or new coastal development permit application is pending pursuant to the special conditions of this permit.***

3. Non-conforming Rights - Demolition

This coastal development permit does not permit the demolition of the existing structure on the site. The submitted plans show that more than fifty-percent (50%) of the exterior walls of the existing structure will remain in place. If, for any reason, more than fifty-

percent (50%) of the exterior walls of the existing structure are removed, the applicants shall stop work and submit an application to amend this coastal development permit.

After demolition (of less than fifty-percent of the exterior walls) has been completed, and the framing of the walls to remain is exposed pursuant to the partial demolition plan approved in this permit, **but prior to any new construction**, the applicants shall request and receive a site inspection by the Commission staff person assigned to this coastal development permit. The staff's inspection report shall indicate whether any demolition beyond the amount shown on the partial demolition plan approved by this permit has occurred. If additional demolition has already occurred or must occur due to the deteriorated state of the walls, which were proposed by the applicants to remain, the applicants shall submit a complete amendment application or a complete application for a new coastal development permit. The application shall address the issue of revisions to the project due to the need for additional demolition. Whether an amendment or a new application is submitted shall be determined by the Executive Director.

No further development may occur until either:

- a) The Executive Director determines, pursuant to the staff's inspection report and in consultation with the City Department of Building and Safety, that all walls identified as walls to remain are intact and structurally sound; or
- b) The applicants submit an amendment request application if so directed by the Executive Director and the amendment request is subsequently approved by the Coastal Commission and issued by the Executive Director; or
- c) The applicants submit a new coastal development permit application if so directed by the Executive Director and the coastal development permit is approved by the Coastal Commission (and also the City of Los Angeles Planning Department, if necessary) and issued by the Executive Director (and City).

4. Residential Density

The permitted use of the approved structure is limited to a duplex. Any proposed change in the number of units or change in use shall be submitted to the Executive Director to determine whether an amendment to this permit is necessary pursuant to the requirements of the Coastal Act and the California Code of Regulations.

5. Parking

The proposed on-site parking supply (two-car garage plus one uncovered space) shall be provided and maintained on the site shown on **Exhibit #7 of the 8/25/04 staff report**. Vehicular access to the on-site parking shall be taken only from Speedway Alley.

6. Building Height

The roof of the approved structure shall not exceed thirty-five feet (35') in elevation above the Ocean Front Walk right-of-way. Roof deck railings of an open design shall not exceed 42 inches above the 35-foot roof height limit. Chimneys, exhaust ducts, ventilation shafts and other similar devices essential for building function may extend up

to forty feet (40') in elevation above the Ocean Front Walk right-of-way. One roof access stairway enclosure, with a footprint not to exceed one hundred square feet in area, may extend up to forty feet (40') in elevation above the Ocean Front Walk right-of-way. No portion of any structure shall exceed forty feet (40') in elevation above the Ocean Front Walk right-of-way.

7. Ocean Front Walk

Private use or development of the public right-of-way of Ocean Front Walk is not permitted. Unpermitted off-site development includes, but is not limited to, construction, storage, landscaping and posting of signs.

8. Construction Responsibilities and Debris Removal

- A. No construction materials, equipment, debris, or waste will be placed or stored where it may be subject to wave, wind, or rain erosion and dispersion.
- B. Any and all demolition/construction material shall be removed from the site within ten days of completion of demolition/construction and disposed of at an appropriate location.
- C. Erosion control/sedimentation Best Management Practices (BMPs) shall be used to control sedimentation impacts to coastal waters during construction. BMPs shall include, but are not limited to: placement of sand bags around drainage inlets to prevent runoff/sediment transport into the sea or canals and a pre-construction meeting to review procedural and BMP guidelines.
- D. The applicant shall dispose of all demolition and construction debris resulting from the proposed project at an appropriate location. If the disposal site is located within the coastal zone, a coastal development permit or an amendment to this permit shall be required before disposal can take place.

IV. Findings and Declarations

The Commission hereby finds and declares:

A. Project Description

The applicants propose to remodel and enlarge an existing two-story, 2,280 square foot duplex on a beachfront lot near the Venice Pier (See Exhibits). The proposed project includes additions to the front and rear portions of the two existing floor levels, and the addition of a new third story, resulting in a three-story, 35-foot high, 4,030 square foot building (Exhibit #7). The application indicates that more than fifty-percent (approximately 75%) of the exterior walls of the existing structure will remain in place during the proposed renovation and enlargement (Exhibit #6).

The applicants propose to maintain and use the renovated structure as a duplex with a non-conforming on-site parking supply. Currently, the rear of the 28-foot wide lot provides space for three on-site parking spaces (Exhibit #6). The proposed renovated building has a new attached two-car garage and one guest parking space, all accessed from Speedway, the rear alley (Exhibit #7).

The project site is a 2,520 square foot lot situated on the inland side of the Venice Boardwalk (Ocean Front Walk), an improved public walkway situated between the private lots of the residential neighborhood and the open sandy public beach (Exhibit #3). The surrounding neighborhood is comprised primarily of two-story and three-story multiple-unit and single-family residential buildings, and the commercial area on Washington Boulevard (Exhibit #3). The site does not front a walk street.

The proposed project complies with the 35-foot height limit for the site set forth by the certified Venice Land Use Plan (LUP). One forty-foot high roof access stairway enclosure is proposed in order to provide access to the new roof deck (Exhibit #9). The proposed house is 22 feet wide, because the lot, like the others on the block, is only 28 feet wide. Three-foot wide side yards are being provided. The proposed addition is set back five feet from the Ocean Front Walk right-of-way, also known as the Venice Boardwalk (Exhibit #7).

B. Demolition vs. Remodel

The issue of whether a project constitutes demolition and new construction rather than a remodel of an existing structure becomes significant when the applicants propose to retain an existing non-conformity. In the case of the proposed project, the applicants are requesting approval for the renovation of a duplex that is non-conforming in regards to parking. The parking requirement table (Policy II.A.3) contained in the certified Venice Land Use Plan (LUP) sets forth a requirement for a minimum of two on-site parking spaces for each residential unit (four for a duplex). Three on-site parking spaces exist on the site, and three would be provided by the proposed two-unit renovation project (Exhibits #6&7).

The applicants have submitted detailed information about the amount of demolition that would occur with the proposed project. Typically, the Commission has quantified demolition by tabulating the extent of exterior linear walls to be removed compared to the total overall amount of exterior linear walls existing prior to the proposed development. The walls proposed to remain must retain their structural components such as studs. Cosmetic portions of the wall, such as exterior stucco and interior drywall, may be removed.

In the case of the proposed project, most of three of the four exterior walls of the existing building are proposed to be retained and remain standing (Exhibit #6). The interior of the duplex would be gutted to allow for a new floor plan on the two existing levels, while a new third story and a new flat roof would be added to the top of the old building shell. The interior floor area of the duplex would be increased from 2,280 square feet to 4,030 square feet. Two renovated residential units would occupy the site if the proposed project is approved and completed.

The Commission has generally found that if less than fifty-percent (50%) of the linear feet of the existing exterior walls are removed, the project can be reviewed as a remodel or renovation rather than new construction. The significance of this distinction is that existing non-conformities may remain in a remodel or renovated structure. However, it must be noted that the amount of demolition could easily exceed the critical fifty-percent point once demolition is begun, either by accident or for other reasons. For example, a contractor could "unwittingly" or "accidentally" knock down a wall, or it may appear prudent to the contractor to

remove and rebuild a section of existing wall to facilitate construction. Further, it is not uncommon to discover structural problems such as termites or dry rot within walls that were proposed to remain once the studs are exposed. This situation often arises in the case of older homes like the existing structure, which was constructed about fifty years ago. When this happens the wall must be taken down to meet building safety standards. Once a new wall is erected in the same location, it is virtually impossible to determine that the wall replacement has occurred. This leads to the situation where a remodel project really constitutes demolition and new development, and would have been required to meet the appropriate parking standards. This issue has arisen with previously approved coastal development permits including Coastal Development Permit 5-01-327 (Storey) in Venice and Coastal Development Permit 5-98-251 (Boehringer) for a project in Laguna Beach.

The Commission finds that application of the fifty-percent demolition threshold provides a consistent and equitable method of dealing with existing non-conformities associated with extensive remodel projects. Therefore, the Commission finds that because the proposed project does not exceed the fifty-percent threshold, it does not constitute demolition and new construction and so the existing non-conforming parking situation may remain. However, contingencies must be in place once the demolition is under way to assure that the critical threshold is not exceeded, or if it is exceeded, to establish an avenue which allows the project to be re-assessed based on the revised demolition figure.

As stated above, a frequent reason additional demolition becomes necessary is the discovery of termites and termite damage within the walls proposed to remain. In order to minimize the chances of this issue arising after demolition has begun, a special condition is being imposed which requires the applicants to submit a termite inspection report prior to issuance of the coastal development permit. If the report indicates that the walls proposed to remain are damaged, the applicants are required to submit an amendment application or an application for a new coastal development permit. The Executive Director would determine whether an amendment or new permit application is appropriate. Once a complete application is received, the project would be evaluated based on the newly discovered information.

Another special condition is being imposed which requires that the applicants to request and receive a site inspection by the Commission staff person after the proposed demolition is complete and the framing of the walls to remain is exposed, but before any new construction has commenced. The staff's inspection report would verify the extent of demolition and the condition of the walls remaining. If the inspection indicates that more demolition has occurred than was approved (per the applicants' partial demolition plan) or that the walls originally proposed to remain are not structurally sound, the applicants are required to submit an amendment application or an application for a new coastal development permit. Again, the Executive Director would determine whether an amendment or new permit application is appropriate. Once a complete application is received, the project would then be evaluated based on the newly discovered information.

These special conditions are necessary to assure that development is carried out as proposed and that the development is consistent with the Chapter 3 policies of the Coastal Act. The proposed project's consistency with specific Sections of the Coastal Act is discussed below.

C. Public Access- Parking

The Commission has consistently found that a direct relationship exists between residential density, the provision of adequate parking, and the availability of public access to the coast. Sections 30210 and 30211 provide for maximum access. Section 30252 requires that new development should maintain and enhance public access to the coast by providing adequate parking facilities.

Section 30210 of the Coastal Act states, in part:

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 of the Coastal Act states:

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 30252 of the Coastal Act states, in part:

The location and amount of new development should maintain and enhance public access to the coast by... (4) providing adequate parking facilities....

The Coastal Act requires that new development not reduce existing access and that adequate parking be provided within new developments in order to protect public opportunities to access the shoreline and recreation areas. The Venice Canals, Venice Pier and Venice Beach, all in the neighborhood of the proposed project, are very popular public recreation areas. Because many of the older developments in the Venice Canals area and along Washington Boulevard do not provide adequate on-site parking to meet their parking demands, area visitors and residents often depend on the limited public parking provided by the local streets. The availability of parking on the public streets is limited by the fact that the streets in this neighborhood are primarily walk streets and narrow alleys. The competition for the limited on-street parking is very intense since the limited amount of public parking on the surrounding streets is being used by guests and residents of the area. As a result, there is a parking shortage in the area and public access has been negatively impacted by the difficulty in finding a parking space. To mitigate this problem, the Commission has consistently conditioned new residential projects to provide at least two on-site parking spaces per unit, plus guest parking.

The proposed project does not conform to the parking standards that are applicable to new projects the area. A new two-unit residential project in Venice would typically be required to provide four on-site parking spaces pursuant to the parking table in the certified Venice LUP and the Venice Specific Plan. Three on-site parking spaces exist on the site, and three would be provided by the proposed two-unit renovation project (Exhibits #6&7). Therefore, the existing parking deficiency on the site will not be changed.

Therefore, staff is recommending that the Commission conditionally approve the proposed project because the project is a renovation and not a new building, as explained in the prior section of this staff report. Because the project is a renovation, and not a new building, the applicants are not required to increase the amount of on-site parking spaces above the three existing spaces. The permit is conditioned to ensure the continued provision of the three on-site parking spaces to serve the two existing residential units. The Commission finds that, only as conditioned to ensure the continued provision of the existing on-site parking, is the proposed project consistent with the public access policies of the Coastal Act and the public parking policy of the certified Venice LUP.

D. Public Access and Recreation

The public access and recreation policies of the Coastal Act require that maximum access and recreational opportunities be provided and that development shall not interfere with public access. The certified Venice LUP protects public access along the historic Venice walk streets and the Venice boardwalk. Therefore, the proposed development be designed to avoid any new adverse impacts on public access to the coast or to nearby recreational facilities.

Section 30210 of the Coastal Act states:

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 of the Coastal Act states:

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.

Shoreline recreation resources in the Venice area include: Venice Beach, Ballona Lagoon, the Venice Canals, walk streets, boardwalk, and the Marina del Rey north jetty which lies partly in the jurisdiction of the City of Los Angeles. Venice Beach is a publicly owned sandy beach, which provides direct access to the entire oceanfront shoreline and is readily accessible to pedestrians and bicyclists. The boardwalk and walk streets in the North Venice and Marina Peninsula neighborhoods provide excellent pedestrian access to the beach. It is a goal of the Coastal Commission and the City to protect these public resources. Unregulated development along the boardwalk and walk streets could cause an over developed, crowded feel that may discourage public use and enjoyment of these pedestrian accessways. Discouraging public access is inconsistent with the certified LUP and the public access policies of the Coastal Act.

As conditioned, the proposed project would not adversely impact public access. The special conditions protect public access along the Ocean Front Walk right-of-way (the Venice Boardwalk) and prohibit encroachments on the boardwalk (Special Condition Seven). Therefore, as conditioned, the proposed development conforms with the public access and recreation policies of the Coastal Act.

E. Marine Resources and Water Quality

The proposed work will be occurring in a location where there is a potential for a discharge of polluted runoff from the project site into coastal waters. The storage or placement of construction material, debris, or waste in a location where it could be carried into coastal waters would result in an adverse effect on the marine environment. To reduce the potential for construction related impacts on water quality, the Commission imposes special conditions requiring, but not limited to, the appropriate storage and handling of construction equipment and materials to minimize the potential of pollutants to enter coastal waters. As conditioned, the Commission finds that the development conforms with Sections 30230 and 32031 of the Coastal Act.

F. Local Coastal Program

Section 30604(a) of the Coastal Act provides that the Commission shall issue a coastal development permit only if the project will not prejudice the ability of the local government having jurisdiction to prepare a Local Coastal Program (LCP) which conforms with Chapter 3 policies of the Coastal Act:

(a) Prior to certification of the Local Coastal Program, a coastal development permit shall be issued if the issuing agency, or the commission on appeal, finds that the proposed development is in conformity with the provisions of Chapter 3 (commencing with Section 30200) of this division and that the permitted development will not prejudice the ability of the local government to prepare a Local Coastal Program that is in conformity with the provisions of Chapter 3 (commencing with Section 30200). A denial of a coastal development permit on grounds it would prejudice the ability of the local government to prepare a Local Coastal Program that is in conformity with the provisions of Chapter 3 (commencing with Section 30200) shall be accompanied by a specific finding which sets forth the basis for such conclusion.

The City of Los Angeles does not have a certified Local Coastal Program for the Venice area. The City of Los Angeles Land Use Plan (LUP) for Venice was effectively certified on June 14, 2001. As conditioned the proposed development is consistent with Chapter 3 of the Coastal Act.

The proposed project does not conform to the parking requirements for new residential projects as set forth in the certified Venice LUP. Nonetheless, approval of the project, as conditioned, will not prejudice the ability of the local government to prepare an LCP that is in conformity with the provisions of Chapter 3 of the Coastal Act because the proposed project is a renovation of an existing structure and not a new building.

G. California Environmental Quality Act (CEQA)

Section 13096 Title 14 of the California Code of Regulations requires Commission approval of a coastal development permit application to be supported by a finding showing the application, as conditioned by any conditions of approval, to be consistent with any applicable requirements of the California Environmental Quality Act (CEQA). Section 21080.5(d)(2)(A) of

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

The proposed project, as conditioned, has been found consistent with the Chapter 3 policies of the Coastal Act. All adverse impacts have been minimized by the recommended conditions of approval and there are no feasible alternatives or additional 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 can be found consistent with the requirements of the Coastal Act to conform to CEQA.

VENICE, CA



COASTAL COMMISSION

5-05-178

EXHIBIT #

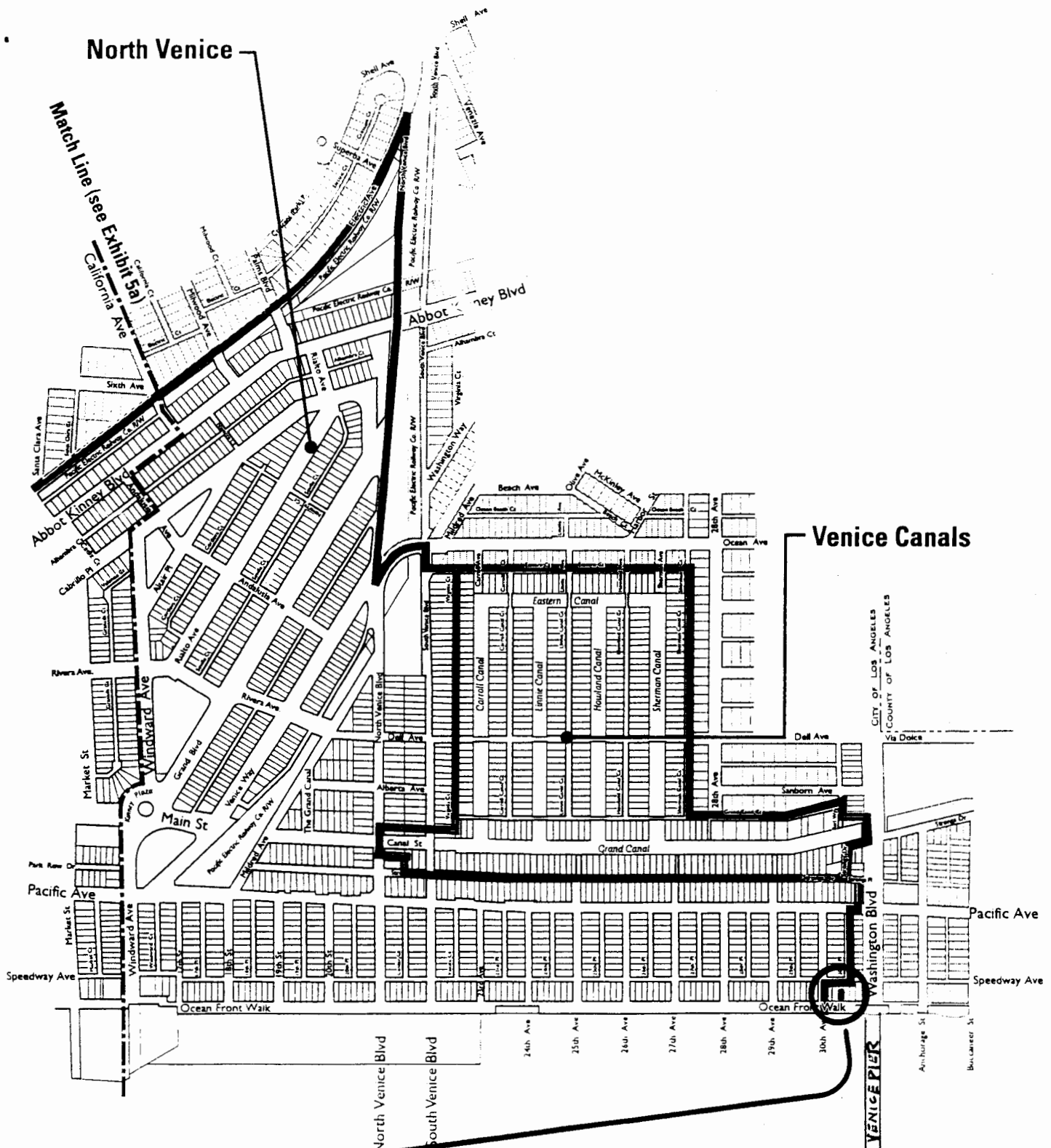
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Site: 3009 OFW

LUP
Exhibit 5b

Subarea: North Venice • Venice Canal

Not to Scale

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MAP 4226
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MAP
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EXHIBIT # 3

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TARGON RESIDENCE
3009 OCEAN FRONT WALK
VENICE, CA 90292

North

PIER

Site

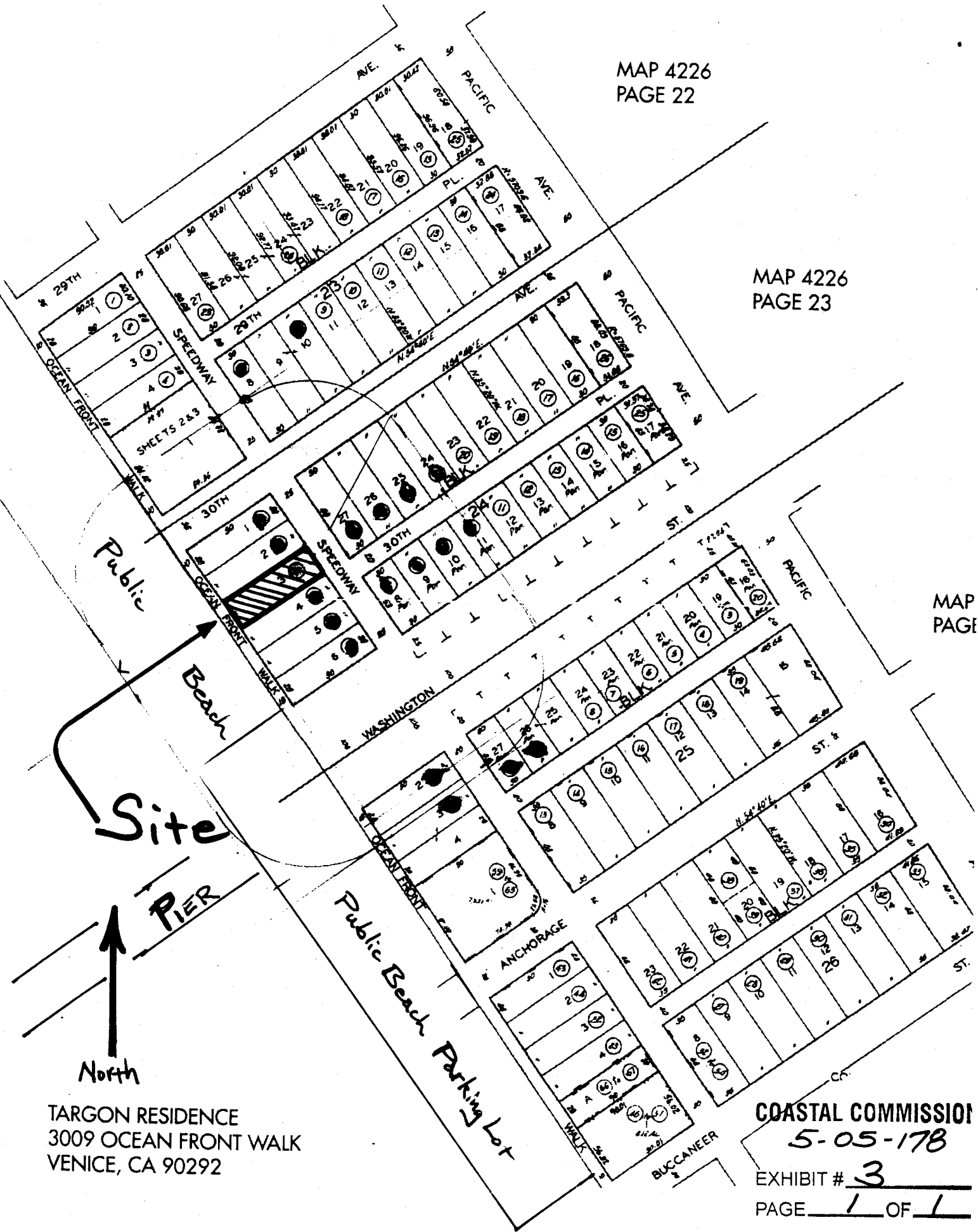
Beach

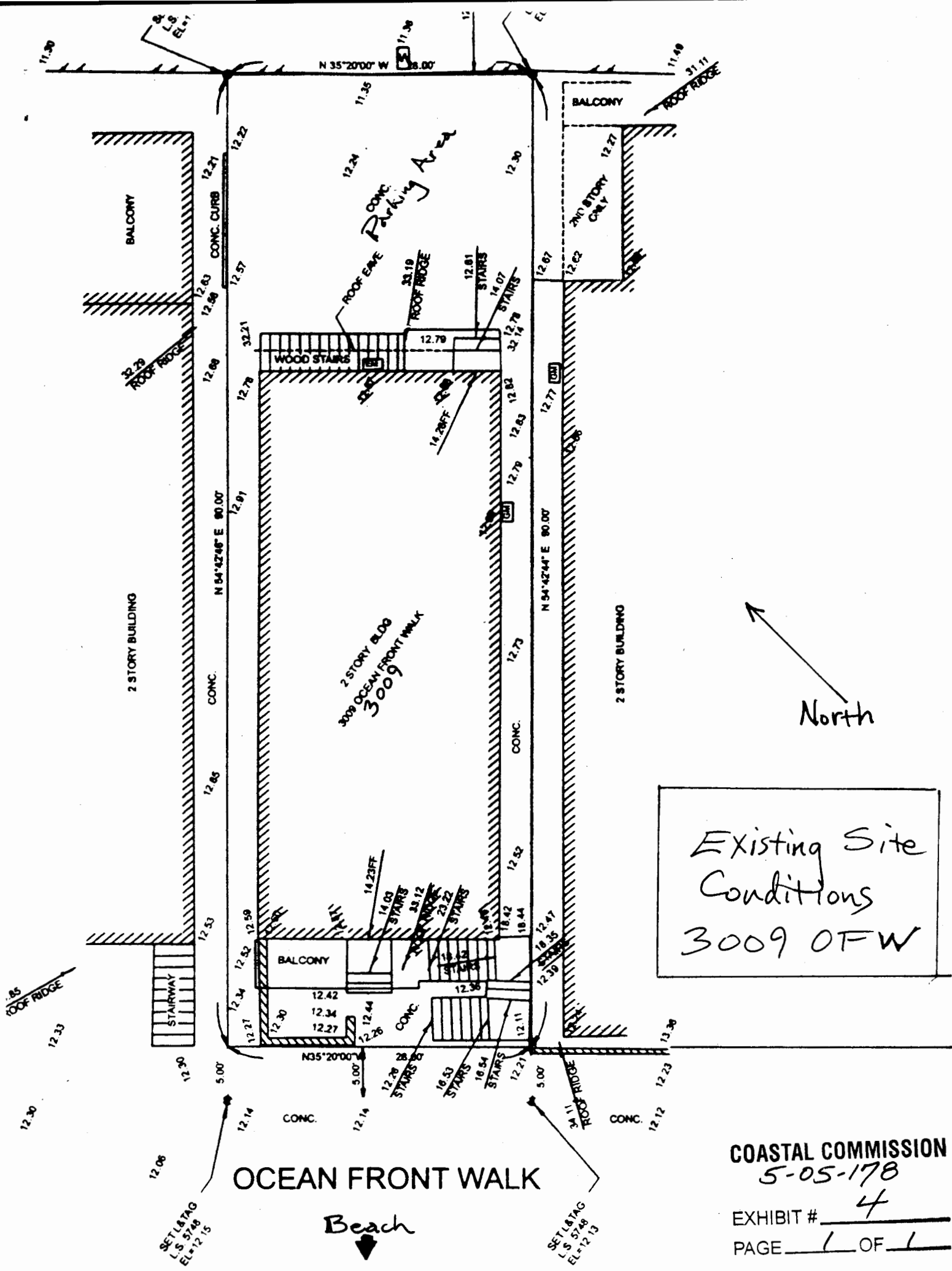
Public

Public Beach
Parking Lot

ANCHORAGE

BUCCANEER





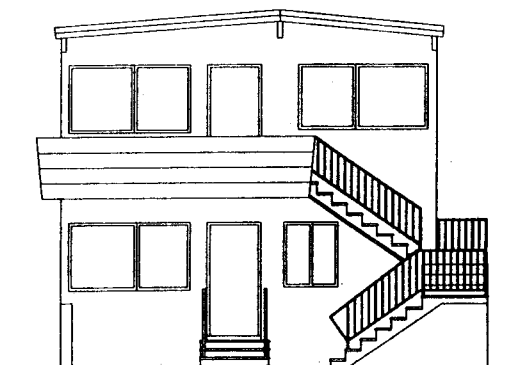
Existing Site
Conditions
3009 OFW

220'
CEILING

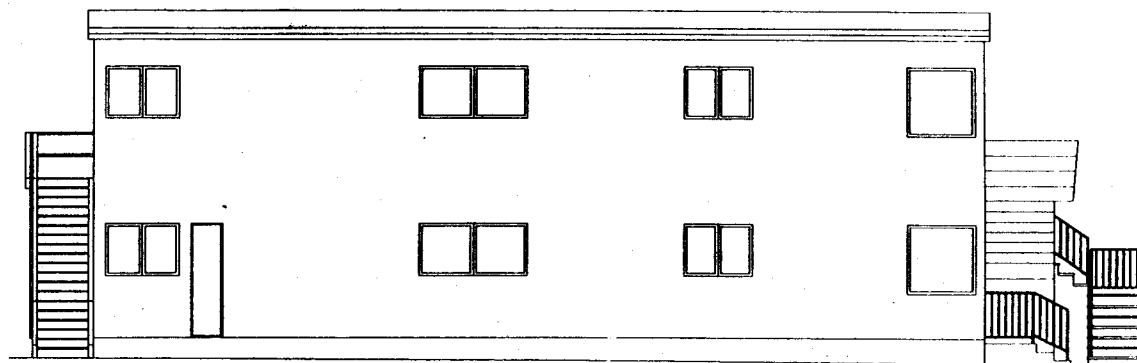
SECOND FLOOR
CEILING

14.23 FIRST FLOOR

12.44 FRONT PATIO



WEST ELEVATION - OFW



NORTH ELEVATION

Ocean Front Walk

Existing Building - 3009 OFW

COASTAL COMMISSION

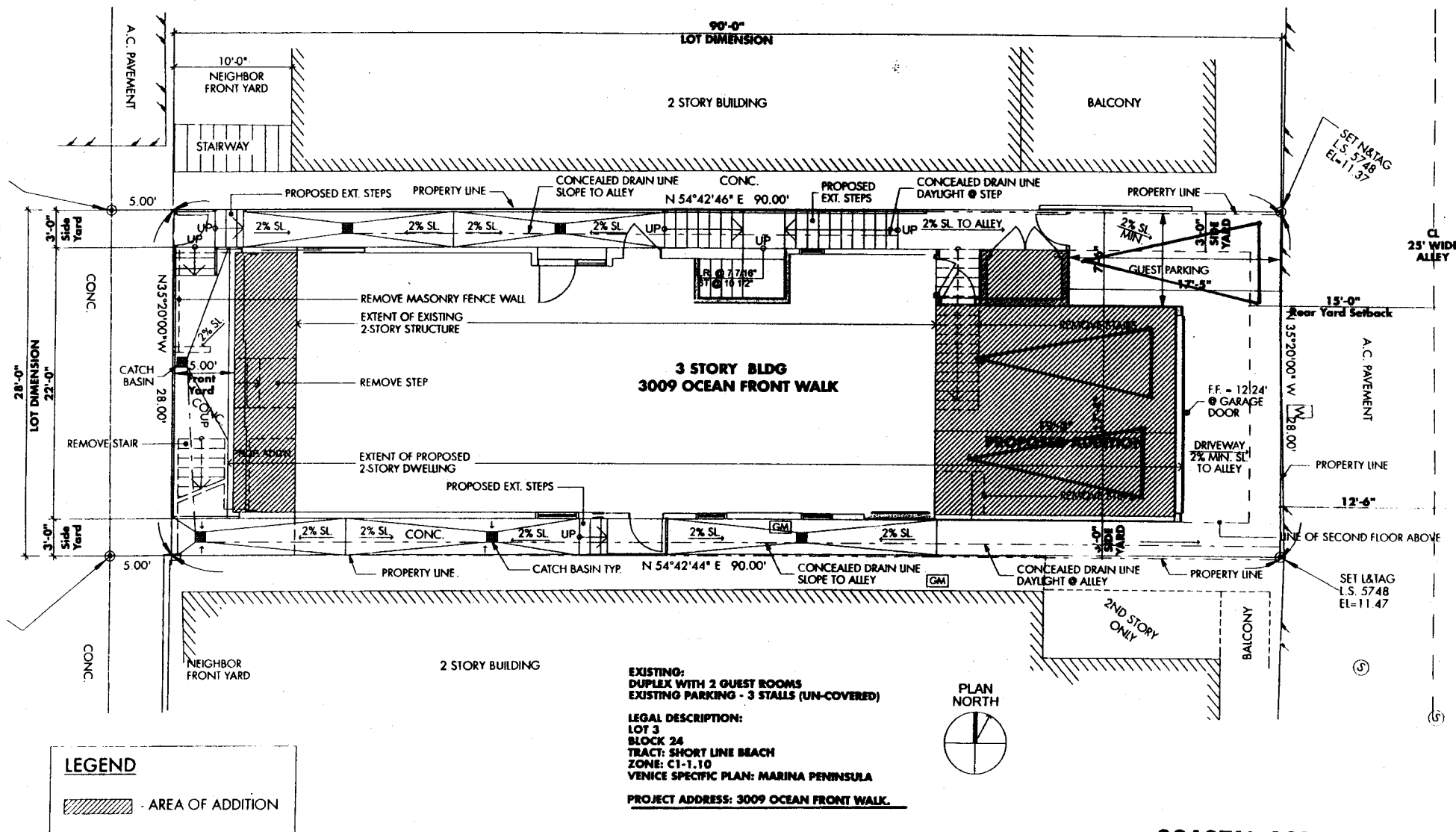
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EXHIBIT # 5

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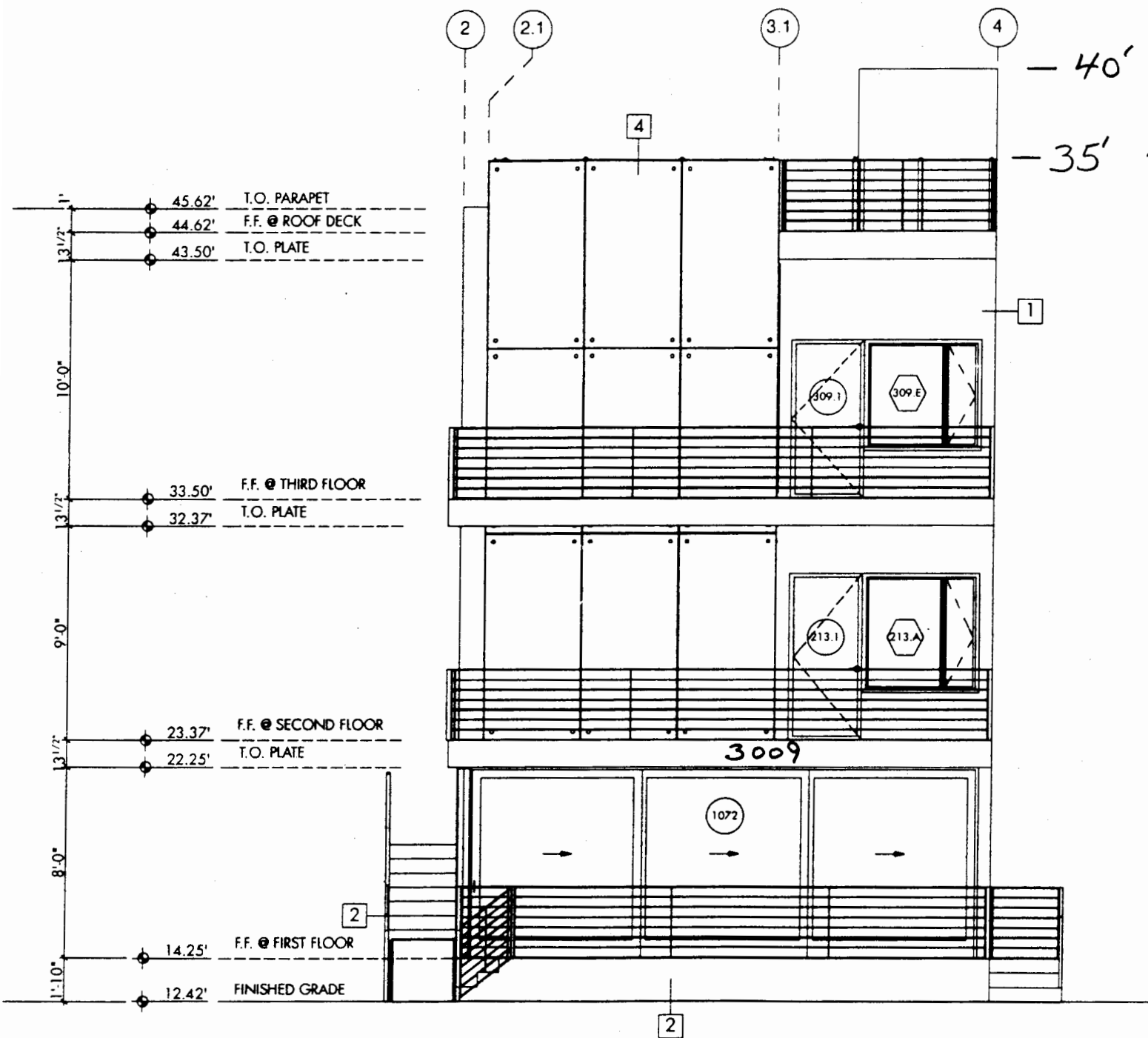
OCEAN FRONT WALK



Proposed Site Plan

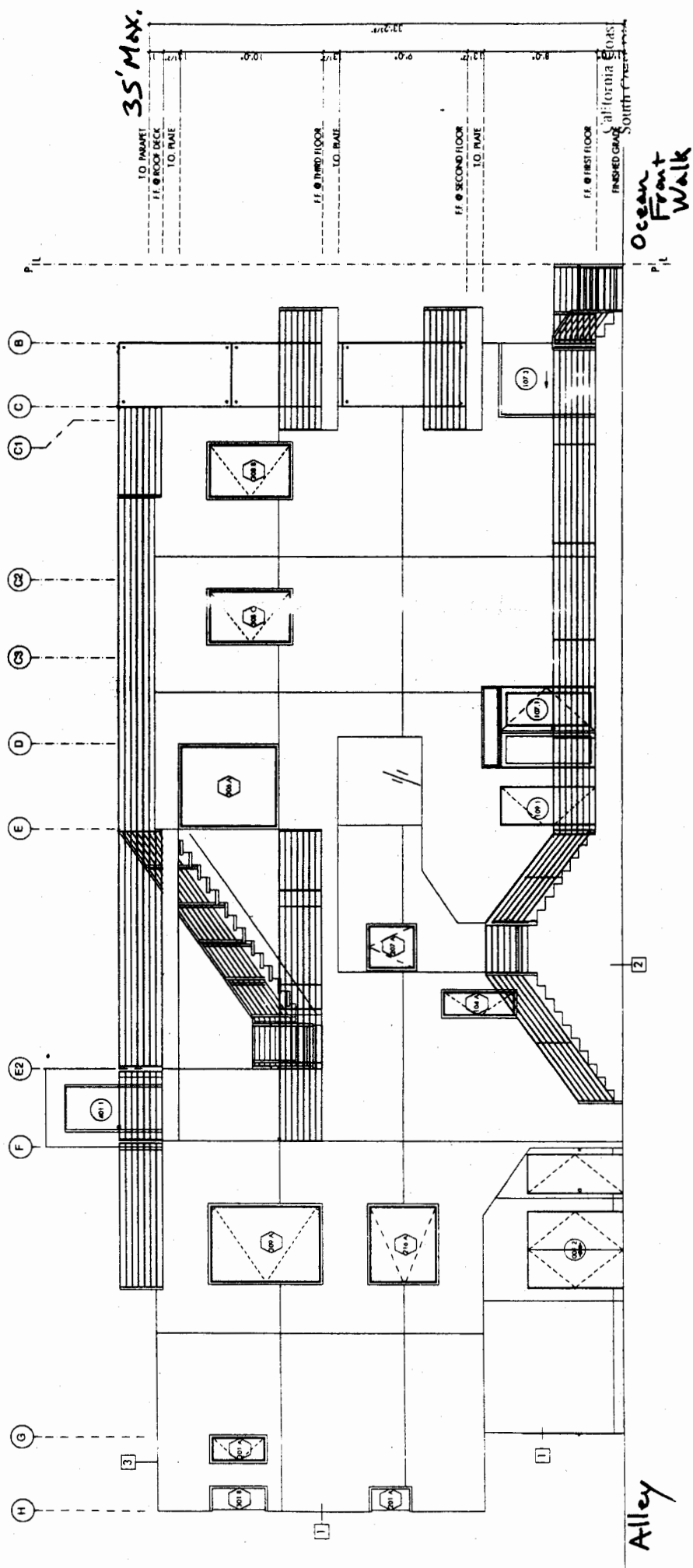
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Proposed Front (facing the beach)
Elevation

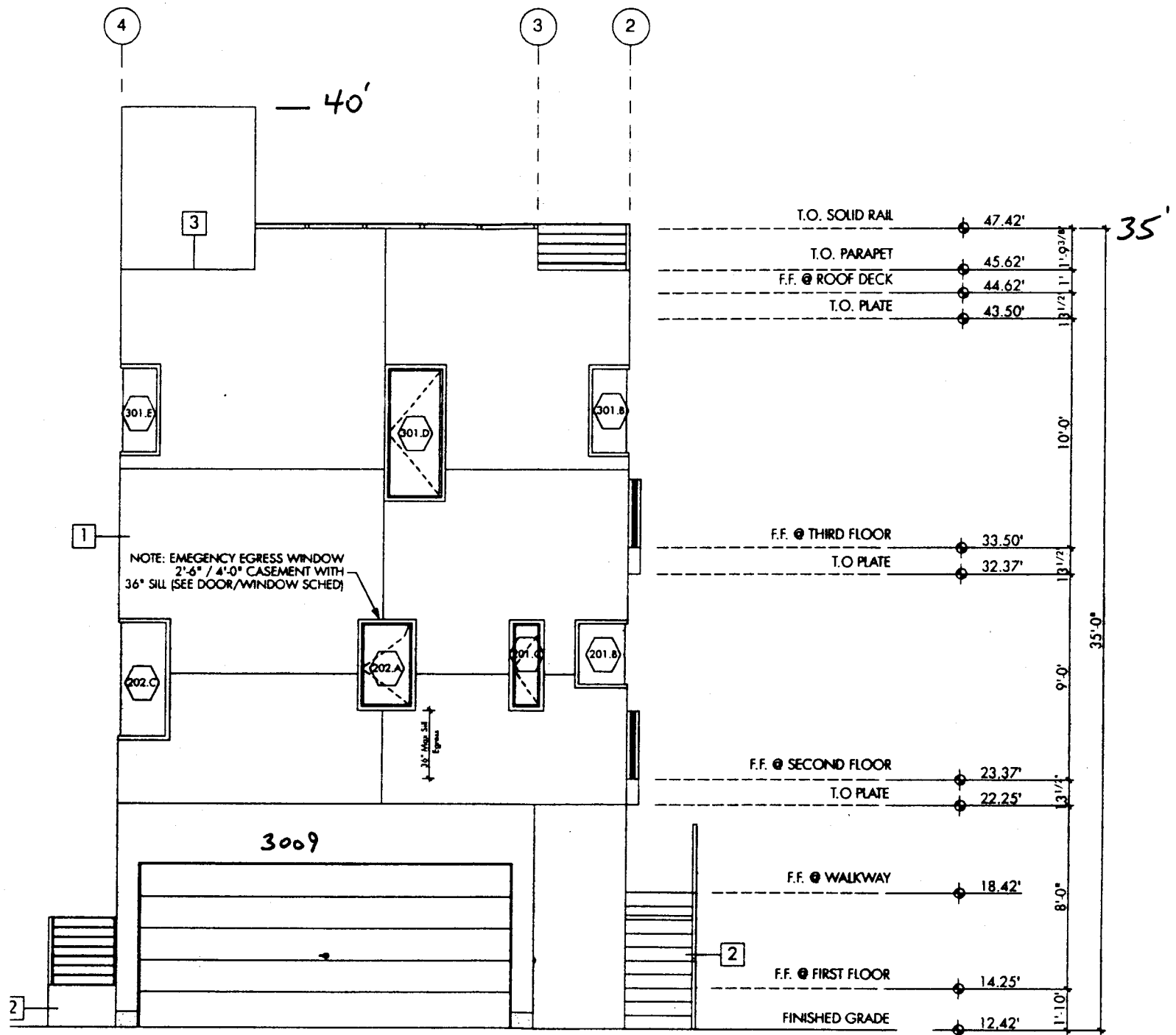
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Rear (Alley-Speedway) Elevation

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EXHIBIT # 10

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