

CALIFORNIA COASTAL COMMISSION

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Filed: August 8, 2006
49th Day: September 26, 2005
180th Day: February 4, 2007
Staff: Fernie Sy-LB
Staff Report: September 21, 2006
Hearing Date: October 11-13, 2006
Commission Action:

**STAFF REPORT: CONSENT CALENDAR**

APPLICATION NO.: 5-06-210

APPLICANT: Cross Communities, Attn: Mark Cross

AGENTS: Ian J.N. Harrison, Architect

PROJECT LOCATION: 1711 East Bay Avenue, City of Newport Beach (County of Orange)

PROJECT DESCRIPTION: Demolition of an existing single-family residence and construction of a new 3,258 square foot three-story single family residence with an attached 489 square foot two-car garage. Grading will consist of 275 cubic yards for recompaction purposes. In addition, the applicant is requesting after-the-fact approval of construction of the existing bulkhead. Also, new work to the bulkhead consisting of a new cap is proposed.

LOCAL APPROVALS RECEIVED: Approval In Concept (No. 0552-2006) from the City of Newport Beach Planning Department dated April 4, 2006.

SUMMARY OF STAFF RECOMMENDATION:

The applicant is proposing the demolition and construction of a single-family residence, replacement of the existing bulkhead cap and after-the-fact approval of construction of the existing bulkhead. The subject site is subject to tidal action, but not to direct wave attack because the site is located within a protected channel of the Newport Harbor. The proposed bulkhead is necessary to protect existing structures from tidal induced erosion and will have no new impacts upon shoreline sand supply because the device is located in the same location as the existing. The major issues before the Commission relate to the effect of the proposed development on marine resources and water quality.

Staff recommends the Commission **APPROVE** the proposed development with **Seven (7) Special Conditions**. **Special Condition No. 1** deals with construction responsibilities and debris removal. **Special Condition No. 2** requires submittal of as-built bulkhead plans. **Special Condition No. 3** requires submittal of City of Newport Beach Harbor Resources Division review for the bulkhead cap work. **Special Condition No. 4** requires preparation of a Bulkhead Maintenance Plan providing for inspection monitoring assessing the continued integrity of the bulkhead reinforcement. **Special Condition No. 5** requires the applicant to consider the use of alternatives to plastic should such alternative become available in the future. **Special Condition No. 6** requires conformance with the submitted Drainage and Run-off Control Plan (including landscape controls). **Special Condition No. 7** deals with condition compliance.

Section 30600(c) of the Coastal Act provides for the issuance of coastal development permits directly by the Commission in regions where the local government having jurisdiction does not have a certified Local Coastal Program. The City of Newport Beach only has a certified Land Use Plan. Therefore, the Coastal Commission is the permit issuing entity and the standard of review is Chapter 3 of the Coastal Act. The certified Land Use Plan may be used for guidance.

SUBSTANTIVE FILE DOCUMENTS: City of Newport Beach Certified Land Use Plan; *Evaluation of the Existing Seawall Located at 1711 East Bay, Newport Beach, CA (WSA Job #6206)* prepared by William Simpson & Associates dated March 30, 2006; Letter to Ian Harrison from Commission staff dated June 26, 2006; April 21, 2005; Letter to Commission staff from Ian Harrison dated July 3, 2006; Letter to Commission staff from Ian Harrison dated July 24, 2006; *Existing Seawall Located at 1711 East Bay, Newport Beach, CA (WSA Job #6206-1)* prepared by William Simpson & Associates dated July 24, 2006; and Letter to Ian Harrison from Commission staff dated July 31, 2006.

LIST OF EXHIBITS

1. Location Maps
 2. Site Plan/Drainage Plan
 3. Elevations
 4. Bulkhead Cap Replacement Plan
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STAFF RECOMMENDATION:

MOTION: I move that the Commission approve the coastal development permit applications included on the consent calendar in accordance with the staff recommendations.

STAFF RECOMMENDATION TO ADOPT CONSENT CALENDAR:

Staff recommends a **YES** vote. Passage of this motion will result in approval of all the permits included on the consent calendar. The motion passes only by affirmative vote of a majority of the Commissioners present.

RESOLUTION:

I. 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. 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. 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 construction material will be removed from the site within 10 days of completion of construction.
- C. Machinery or construction materials not essential for project improvements will not be allowed at any time in the intertidal zone.
- D. If turbid conditions are generated during construction a silt curtain will be utilized to control turbidity.
- E. Floating booms will be used to contain debris discharged into coastal waters and any debris discharged will be removed as soon as possible but no later than the end of each day.
- F. Non-buoyant debris discharged into coastal waters will be recovered by divers as soon as possible after loss.

2. AS-BUILT BULKHEAD PLANS

- A. PRIOR TO THE ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT**, the applicant shall submit, for the Executive Director's review and approval, two (2) full size sets of plans prepared by a licensed surveyor depicting the entire subject property (and as necessary sufficient portions of surrounding properties) and the precise alignment of the existing bulkhead in relation to property lines, existing and proposed development on-site, and adjacent bulkheads, street(s), any piers, gangways, and docks immediately seaward of the project site, and any other landmarks sufficient to verify the bulkhead alignment during a field inspection of the site.
- B.** The permittee shall undertake development in accordance with the approved final plans. Any proposed changes to the approved final plans shall be reported to the Executive Director. No changes to the approved final plans shall occur without a Commission amendment to this coastal development permit unless the Executive Director determines that no amendment is required.

3. CITY OF NEWPORT BEACH HARBOR RESOURCES DIVISION

PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, applicant shall provide to the Executive Director a copy of a permit issued by City of Newport Beach Harbor Resources Division, or letter of permission, or evidence that no permit or permission is required for the bulkhead cap work on the existing bulkhead. The applicant shall inform the Executive Director of any changes to the project required by the City of Newport Beach Harbor Resources Division. Such changes shall not be incorporated into the project until the applicant obtains a Commission amendment to this coastal development permit, unless the Executive Director determines that no amendment is legally required.

4. BULKHEAD MAINTENANCE

- A.** The permittee shall maintain the bulkhead in good condition throughout the life of the development. **PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT**, the applicant shall submit a Monitoring Plan, for the review and approval of the Executive Director. The permittee, and their successors in interest shall be responsible for carrying out all provisions of the approved Monitoring Plan for as long as the bulkhead remains in place. The monitoring plan, at a minimum, shall provide for:
- (1) Regular inspections by a licensed engineer. These inspections shall be performed at least every year.
 - (2) The inspections shall examine the exposed portions of the bulkhead (to the mud line) for signs of weakness or possible failure, including, but not limited to cracking, bending, splitting, splintering, or flaking. All weak or potential failure areas should be marked on an as-built plan of the bulkhead, and there should be photographs and text to explain the nature and extent of each weakness.
 - (3) Inspection reports shall be prepared and conveyed to the Executive Director within 30 days of the inspection work. These reports shall provide information on and photographs from the date of the inspection,

the name and qualifications of the person performing the inspection, and an overall assessment of the continued integrity of the bulkhead . If the inspection identifies any areas where the bulkhead reinforcement has been damaged, the report shall identify alternatives to remedy the damage.

- (a) In the event that any sections of the bulkhead is damaged or flaking, the permittee shall notify the Commission within 10 days; and in such event, within 30 days of such notification, submit to the Commission a complete application for any coastal development permit amendment, or new permit, necessary for the repair or replacement of the bulkhead.

5. ALTERNATIVES TO PLASTIC

By acceptance of this permit, the applicant agrees to submit an application for an amendment to this permit or a new coastal development permit if new information becomes available that indicates that plastic has harmful effects on the marine environment, and that environmentally superior, feasible alternative(s) are available. The amendment or new coastal development shall include measures to eliminate or significantly reduce the adverse impacts of the plastic including, if necessary, the replacement of the bulkhead.

6. DRAINAGE AND RUN-OFF CONTROL PLAN

The applicant shall conform with the drainage and run-off control plan received on July 3, 2006 showing roof drainage and runoff from all impervious areas directed to dry wells or vegetated/landscaped areas. Vegetated landscaped areas shall only consist of native or non-native, non-invasive plants. Any proposed changes to the approved plan shall be reported to the Executive Director. No changes to the approved plan shall occur without a Commission amendment to this coastal development permit unless the Executive Director determines that no amendment is required.

7. CONDITION COMPLIANCE

Within 90 days of Commission action on this coastal development permit application, or within such additional time as the Executive Director may grant for good cause, the applicants shall satisfy all requirements specified in the conditions hereto that the applicants are required to satisfy prior to issuance of this permit. Failure to comply with this requirement may result in the institution of enforcement action under the provisions of Chapter 9 of the Coastal Act.

IV. FINDINGS AND DECLARATIONS:

The Commission hereby finds and declares:

A. PROJECT LOCATION, DESCRIPTION AND PREVIOUS ACTION AT THE PROJECT SITE

1. Project Location and Description

The proposed project is located on an approximately 3,435 square foot bayfront lot fronting Newport Bay at 1711 East Bay Avenue in the City of Newport Beach, County of Orange (Exhibit #1). The site is designated as Medium Density Residential in the City of Newport Beach Land Use Plan (LUP) and the proposed use conforms to this designation. North of the project site is Newport Bay; South of the project site is West Bay Avenue and to the East and West are existing residential structures on bulkheaded lots. The project site is located in a residential area where the homes fronting Newport Bay are located on bulkheaded lots. Site conditions on the bayward side of the site include an existing bulkhead, pier and dock. The applicant is requesting after-the-fact construction of the existing bulkhead and is also proposing limited bulkhead work consisting of removal and construction of a new cap. No work will be done on the existing dock and pier.

Public access to the bay is located approximately 30-feet east of the project site at the “J” Street, street end.

The project includes demolition of an existing single-family residence and construction of a new 3,258 square foot three-story single-family residence with an attached 489 square foot two-car garage (Exhibits #2-3). The project will also consist of a 278 square foot roof deck and 6-foot high side yard property line walls. Grading will consist of 275 cubic yards for recompaction purposes.

Also, work to the bulkhead is proposed consisting of removal of the existing wooden bulkhead cap located currently at +8.38 MLLW and replace with a new Douglas-Fir Cap at a raised elevation of +9.0 MLLW designed to meet the minimum elevation requirements established by the City of Newport Beach (Exhibits #4). All bulkhead work will take place on the landward side of the existing bulkhead. Work on the existing bulkhead would require approval from the City of Newport Beach Harbor Resources Division; however, no such approval has been obtained. Therefore, the Commission imposes **Special Condition No. 2**, which requires that the applicant provide written evidence review and approval of the bulkhead cap work or evidence that no permit or permission is required from the City of Newport Beach Harbor Resources Division.

To verify the stability of the existing bulkhead, the applicant has submitted an analysis entitled: *Existing Seawall Located at 1711 East Bay, Newport Beach, CA (WSA Job #6206-1)* prepared by William Simpson & Associates dated July 24, 2006. The analysis states that the seawall consists of Trimax Structural Plastic Lumber tongue and groove sheet piles and was constructed approximately 10 years ago and finds that the existing bulkhead is stable and structurally sound. In addition, it finds that the bulkhead should last many years (approximately 50 years based on the materials).

The applicant is also requesting after-the-fact construction of the existing bulkhead. CDP No. 5-84-493 (to be discussed in Section IV. A.2.) was previously approved for construction of the bulkhead, but no permit was ever issued for the development. The existing bulkhead is necessary to protect the existing development including off-site development on adjacent

lots. The existing bulkhead is comprised of plastic material called Trimax Structural Plastic made up of recycled plastic (HDPE) and 30% fiber fill. In order to have accurate plans on file so that any necessary field checking and future confirmation of the alignment can be accomplished, the Commission imposes **Special Condition No. 3**, which requires submittal of as-built bulkhead plans.

The Commission has expressed concern about the use of plastic in the marine environment due to the potential for leaching toxins into the marine environment caused by the possible deterioration of the plastic.

In addition, the Commission's concern with plastics includes the potential to increase plastic debris in the marine environment due to cracking, peeling, and sloughing of plastic used in marine related projects. Since plastic is an inorganic material, it does not biodegrade, but rather continually breaks down into ever-smaller pieces which can adversely effect the marine environment.

The presence of plastics in the coastal and ocean environment is both widespread and harmful to human and marine life. An article, written by Jose G.B. Derraik, entitled "The Pollution of the Marine Environment by Plastic Debris: A Review," reviews much of the literature published on the topic of deleterious effects of plastic debris on the marine environment. The article states:

The literature on marine debris leaves no doubt that plastics make-up most of the marine litter worldwide.¹

In support of this statement, the article includes a table that presents figures on the proportion of plastics among marine debris around the world. In most of the locations listed on the table, plastics represented more than 50 percent of the total marine debris found.² In other studies, the percentage is even higher.

Existing studies clearly demonstrate that plastic debris creates problems for marine life. Plastic marine debris affects at least 267 species worldwide, including 86% of all sea turtle species, 44% of all sea bird species, and 43% of marine mammal species.³ For example, plastics cause significant adverse impacts in seabirds, when birds mistakenly ingest the plastic debris. A study performed in 1988, concluded that seabirds consuming large amounts of plastics reduced their food consumption, which limited their ability to lay down fat deposits and in turn reduced fitness. In addition, ingesting plastics can block gastric enzyme secretion, diminish feeding stimulus, lower steroid hormone levels, delay ovulation, and cause reproductive failures.⁴

Plastic debris that has settled on the seabed floor also harms the biological productivity of coastal waters. In Derraik's article, he states:

¹ Derraik, Jose. "The Pollution of the Marine Environment by Plastic Debris; A Review", Marine Pollution Bulletin, 44: 842-852, 2002.

² Ibid.

³ Laist, D. W. "Impacts of Marine Debris: Entanglement of Marine Life in Marine Debris Including a Comprehensive List of Species with Entanglement and Ingestion Records", Coe, J.M., Rogers, D.B. (Eds.)

⁴ Derraik, Jose. "The Pollution of the Marine Environment by Plastic Debris; A Review", Marine Pollution Bulletin, 44: 842-852, 2002.

The accumulations of such [plastic] debris can inhibit gas exchange between the overlying waters and the pore waters of the sediments, and the resulting hypoxia or anoxia in the benthos can interfere with the normal ecosystem functioning, and alter the make-up of life on the sea floor. Moreover, as for pelagic organisms, benthic biota is likewise subjected to entanglement and ingestion hazards.⁵

Consequently the plastic sheet piles must be monitored to ensure that they are maintained in an environmentally safe operating condition and replaced when damage or degradation has occurred. To minimize the potential of the plastic sheet piles breaking apart and entering the water due to damage or deterioration, **Special Condition No. 4** requires that the project be carefully monitored every year. If monitoring confirms that the use of the plastic sheet piles is damaging marine resources, the applicant is required to submit an application for an amendment to this permit or a new coastal development permit. At that time the proposed repair and/or replacement will be evaluated, including consideration of whether use of such materials should be stopped, and whether more environmentally friendly products have been developed. Further, if new information becomes available indicating that the use of plastic does have harmful effects on the marine environment, and that environmentally superior products are available, consideration must be given to substitution of the environmentally superior alternative to plastic. As a condition of approval, **Special Condition No. 5** requires that the applicant shall agree to submit an application for an amendment to this permit or a new coastal development permit if new information becomes available that indicates that plastic has harmful effects on the marine environment, and that environmentally superior, feasible alternative(s) are available. The amendment or new coastal development shall include measures to eliminate or significantly reduce the adverse impacts of the plastic.

The applicants are proposing water quality improvements as part of the proposed project, including the direction of roof runoff and surface runoff to bottomless catch basins on the project site. The Commission concurs with the submitted, but in order to ensure that the drainage plan is followed, the Commission is imposing **Special Condition No. 6**, which requires the applicant to conform to the submitted Drainage and Run-Off Control Plan received on July 3, 2006. The placement of vegetation that is considered to be invasive which could supplant native vegetation should not be allowed. Invasive plants have the potential to overcome native plants and spread quickly. Invasive plants are generally those identified by the California Invasive Plant Council (<http://www.cal-ipc.org/>) and California Native Plant Society (www.CNPS.org). No plant species listed as problematic and/or invasive by the California Native Plant Society, the California Invasive Plant Council, or as may be identified from time to time by the State of California shall be employed or allowed to naturalize or persist on the site. No plant species listed as a 'noxious weed' by the State of California or the U.S. Federal Government shall be utilized within the property.

2. Previous Action At The Project Site

On May 10, 2006, the Commission approved Administrative Permit Application No. 5-06-134-[Brigandi] to remove and replace an existing boat dock at 1711 East Bay Avenue. The proposed dock consisted of a 6' x 46' float with a 6' x 6' lobe, 3' x 24' gangway, 4' x 26' pier

⁵Ibid.

with a 10' x 14' pier platform, two 16" diameter concrete guide piles, and three 14" diameter concrete "T" piles.

On November 14, 1984, the Commission approved Coastal Development Permit Application No. 5-84-493-[Somers, Farnsworth & Vose] for the construction of a wooden retaining wall and dredging at 1709, 1711 and 1713 East Bay Avenue. Two (2) Special Conditions were imposed: 1) submittal of revised plans for the bulkhead replacement, which show no permanent structures bayward of the existing bulkhead alignment and design elevations at a minimum of 8-feet above MLLW; and 2) submit certification by a registered civil engineer that the proposed shoreline protective device is designed to withstand storms comparable to the winter storms of 1982-1983. The Notice of Intent was issued on November 20, 1984; however, the permit was never issued. According to the analysis entitled: *Existing Seawall Located at 1711 East Bay, Newport Beach, CA (WSA Job #6206-1)* prepared by William Simpson & Associates dated July 24, 2006, the existing bulkhead had been rebuilt approximately 10-years ago in the required alignment stated in Special Condition No. 1 of CDP No. 5-84-493 ; however, no permit was ever issued for this construction. In addition, the applicant has submitted documentation showing that Special Condition No.2 has been complied with. With the proposed application, the applicant is requesting after-the-fact approval of the existing bulkhead.

On March 23, 1983, the Commission approved Coastal Development Permit Application No. 5-82-856-[Somers] for the construction of a wood retaining wall and dredging at 1711 East Bay Avenue. One (1) Special Condition was imposed requiring submittal of revised plans for the bulkhead replacement, which show no permanent structures bayward of the existing bulkhead alignment. A Notice of Intent was issued on March 28, 1983; followed by a withdrawal on November 13, 1983. A permit was never issued and the authorization expired.

B. VIOLATION

Development has occurred on the subject site consisting of construction of the existing bulkhead without the required coastal development permit. The applicant is proposing to retain the existing bulkhead and has requested for after-the-fact authorization of the bulkhead with the proposed project.

To ensure that the unpermitted development component of this application is resolved in a timely manner, **Special Condition No. 7** requires that the applicants satisfy all conditions of this permit, which are prerequisite to the issuance of this permit within 90 days of Commission action. Although construction has taken place prior to submission of this permit application, consideration of the application by the Commission has been based solely upon the Chapter 3 policies of the Coastal Act. Approval of this permit does not constitute a waiver of any legal action with regard to any alleged violations nor does it constitute an admission as to the legality of any development undertaken on the subject site without a coastal permit.

C. WATER QUALITY

The proposed work will be occurring on, within, or adjacent to coastal waters. The storage or placement of construction material, debris, or waste in a location where it could be discharged 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. To reduce the potential for post-construction impacts to water quality the Commission requires the continued use and maintenance of post construction BMPs. As conditioned, the Commission finds that the development conforms with Sections 30230 and 30231 of the Coastal Act.

D. MARINE RESOURCES

The proposed development is the replacement of an existing bulkhead in the same location or landward of the existing bulkhead that is necessary to protect an existing structure. The proposed development will not result in the additional fill of coastal waters as the new bulkhead will be located either in the same location or landward of the existing bulkhead. In the event that the bulkhead is being reconstructed in the same location, it is infeasible to relocate the new bulkhead further landward. The proposed development has been conditioned to minimize adverse effects on the marine environment by avoiding or mitigating impacts upon sensitive marine resources, such as eelgrass, and to avoid contributing to the dispersal of the invasive aquatic algae, *Caulerpa taxifolia*. As conditioned, the project will not significantly adversely impact eelgrass beds and will not contribute to the dispersal of the invasive aquatic algae, *Caulerpa taxifolia*. Further, as proposed and conditioned, the project conforms with Sections 30233 and 30235 of the Coastal Act.

E. PUBLIC ACCESS

As conditioned, the proposed development will not have any new adverse impact on public access to the coast or to nearby recreational facilities. Thus, as conditioned, the proposed development conforms with Sections 30210 through 30214, Sections 30220 through 30224, and 30252 of the Coastal Act

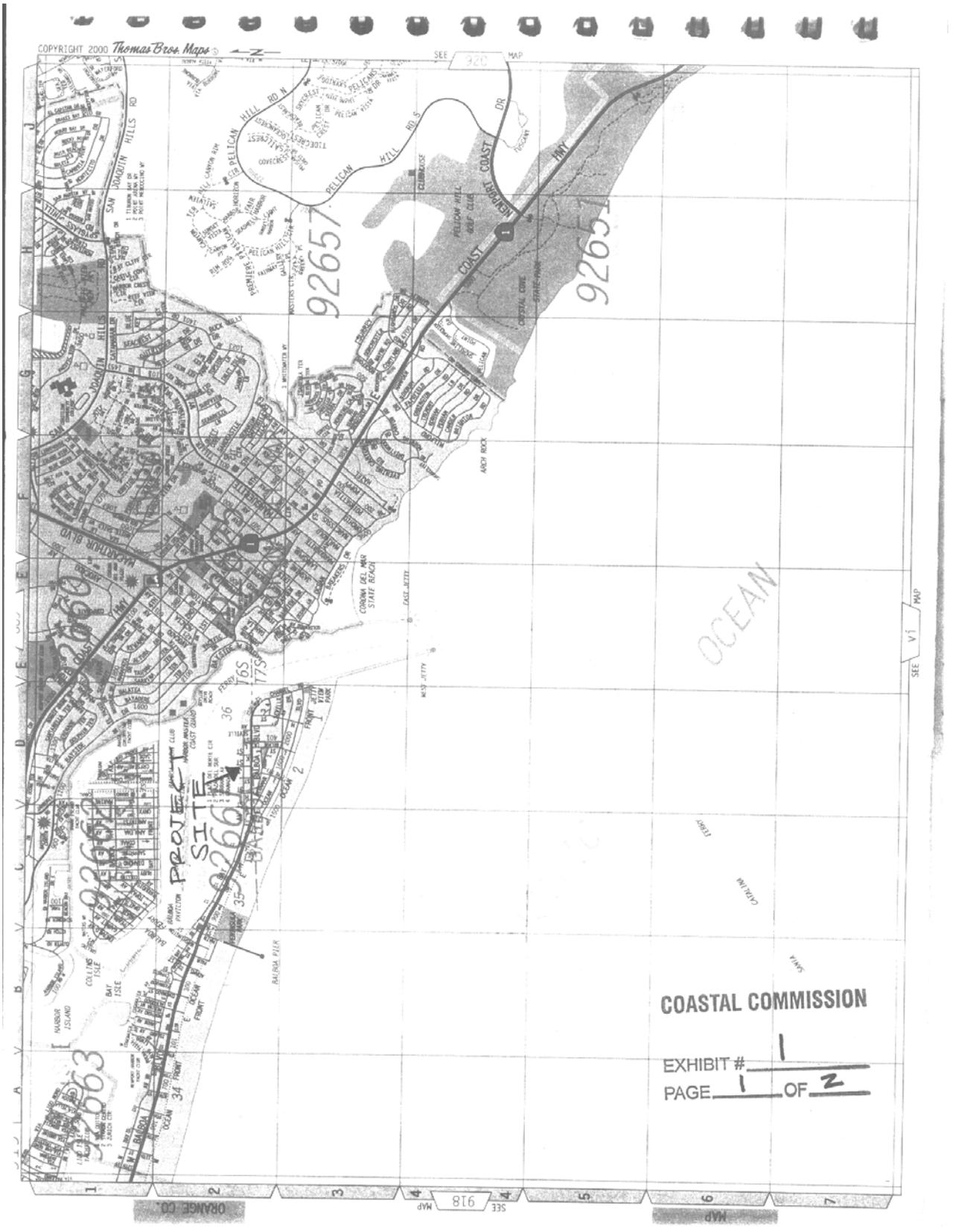
F. LOCAL COASTAL PROGRAM

The LUP for the City of Newport Beach was effectively certified on May 19, 1982. At the October 2005 Coastal Commission Hearing, the certified LUP was updated. As conditioned, the proposed development is consistent with Chapter 3 of the Coastal Act and with the certified Land Use Plan for the area. Approval of the project, as conditioned, 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.

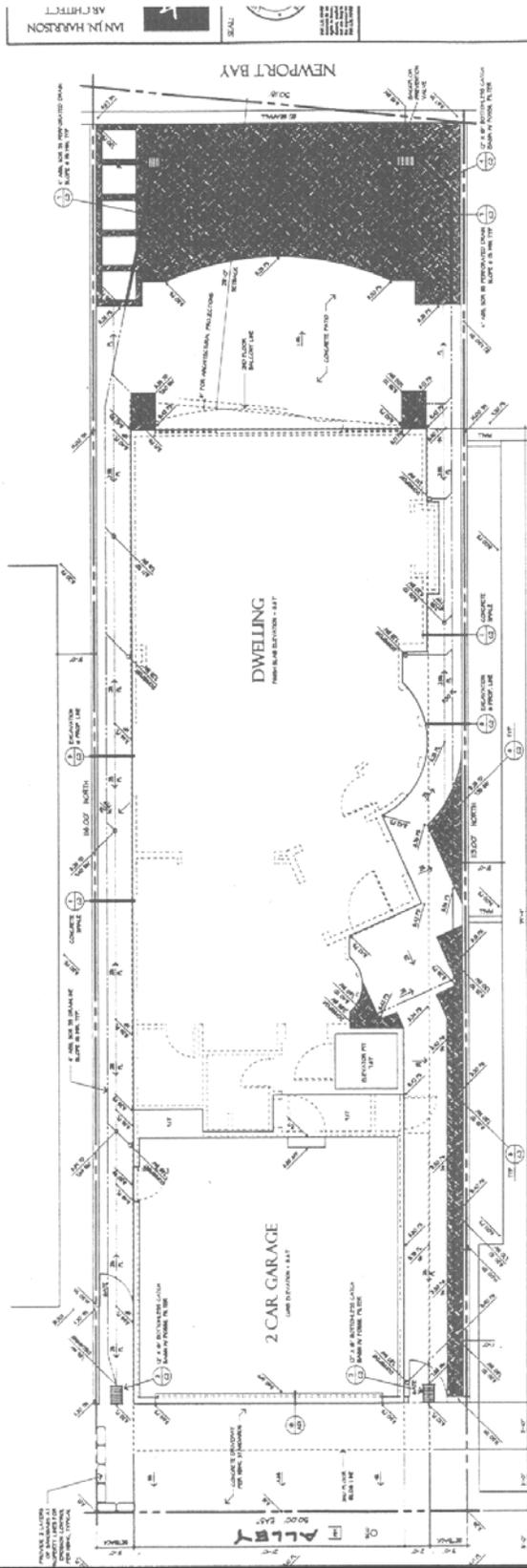
G. CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)

As conditioned, there are no feasible alternatives or additional feasible mitigation measures available that would substantially lessen any significant adverse effect that the activity may have on the environment. Therefore, the Commission finds that the proposed project, as conditioned to mitigate the identified impacts, is the least environmentally damaging feasible alternative and can be found consistent with the requirements of the Coastal Act to conform to CEQA.

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SITE / GRADING / DRAINAGE PLAN



ROSS COMMISSION

PROJECT DATA

PROJECT DESCRIPTION: [REDACTED]
 LEGAL DESCRIPTION: [REDACTED]
 OWNER: [REDACTED]
 PROPERTY ADDRESS: [REDACTED]
 AREA SUMMARY: [REDACTED]

SHEET INDEX

C1 [REDACTED]
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BUILDING CODE INFORMATION

APPLICABLE CODES: [REDACTED]
 CONTRACT TYPE: [REDACTED]
 DELETED SUBMITTALS: [REDACTED]

LEGEND

1. EXISTING [REDACTED]
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PROJECT NOTES

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SITE NOTES

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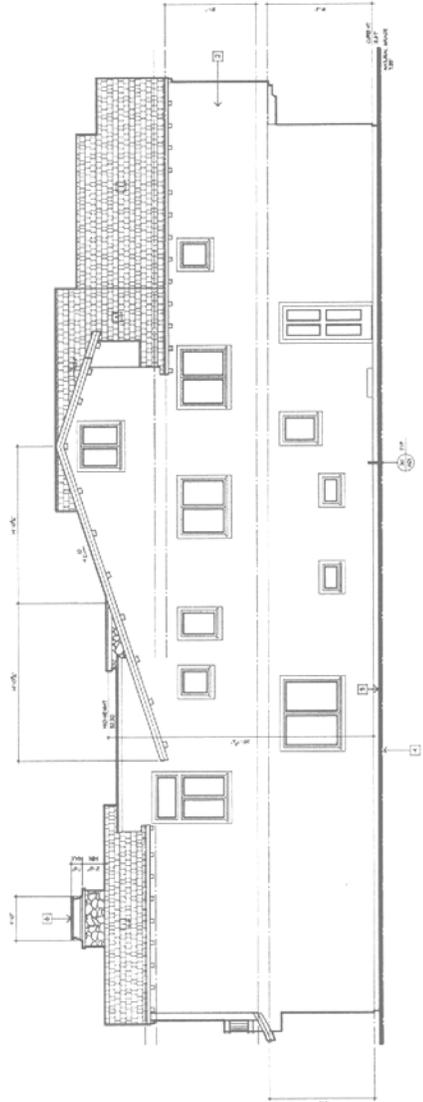
COASTAL COMMISSION

EXHIBIT # 2
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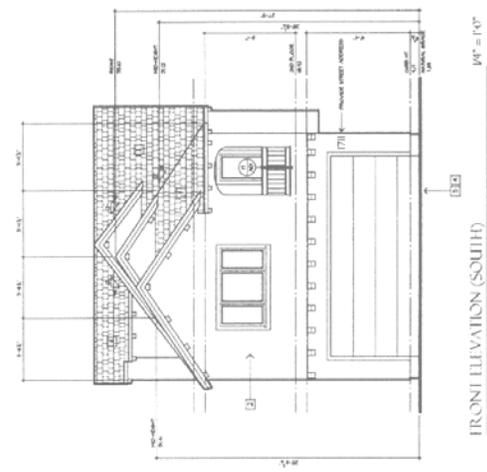
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LANN HANSEN ARCHITECT 2000 WEST COAST TOWER, SUITE 1000, OAKLAND, CALIFORNIA 94612 (415) 778-1000 WWW.LANNHANSEN.COM		EXTERIOR ELEVATIONS SOUTH + WEST	CROSS COMMUNITIES 1711 BAY AVENUE NEWPORT BEACH, CALIFORNIA 92661	SHEET NO. A4 OF 1 SHEETS TOTAL
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LEFT SIDE ELEVATION (WEST) 1/4" = 1'-0"



FRONT ELEVATION (SOUTH) 1/4" = 1'-0"

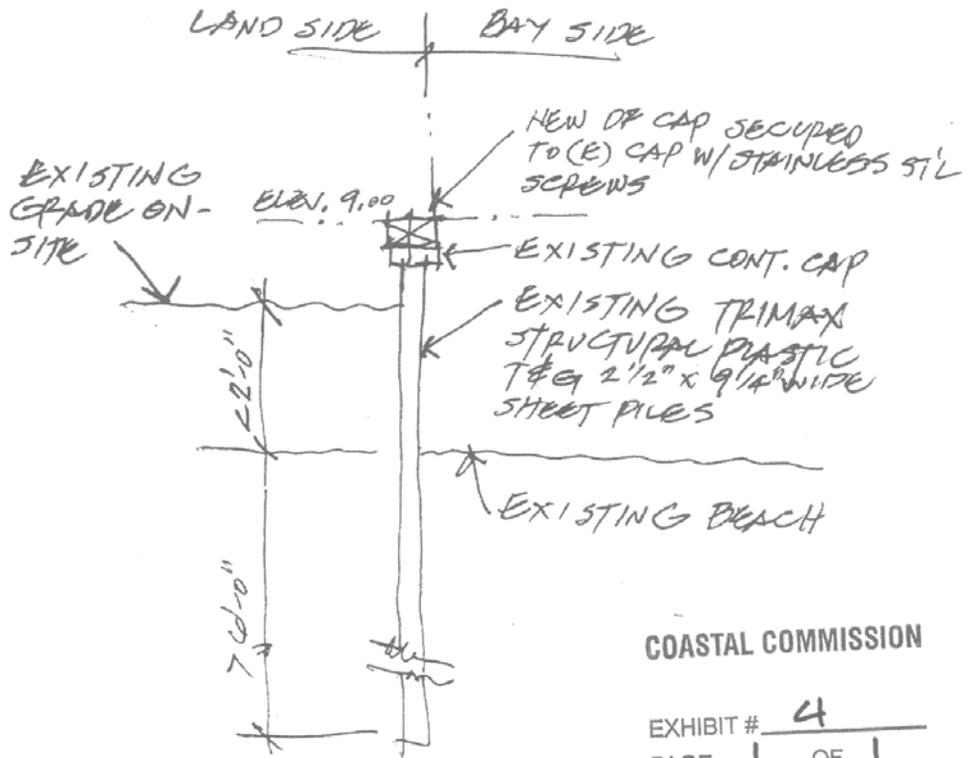
COASTAL COMMISSION

EXHIBIT # 3
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RECEIVED
South Coast Region

JUL 26 2006

CALIFORNIA
COASTAL COMMISSION



COASTAL COMMISSION

EXHIBIT # 4
PAGE 1 OF 1

SEAWALL

California Coastal Commission
South Coast District Office
APPROVED **5-06-210**
Permit No.

By:

EFFECTIVE
Date: