

## CALIFORNIA COASTAL COMMISSION

CENTRAL COAST DISTRICT OFFICE  
725 FRONT STREET, SUITE 300  
SANTA CRUZ, CA 95060  
(831) 427-4863

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## ADMINISTRATIVE PERMIT NUMBER 3-07-031

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**Applicants** ..... **Jennifer Krach, Michael Inglis, and John Laing**

**Project location** ..... At the toe of the bluff and along the beach seaward of 4640, 4630, 4610 and 4600 Opal Cliff Drive in the unincorporated Live Oak area of Santa Cruz County (APNs 033-132-01, 033-132-02, 033-132-03, and 033-151-24) (see location maps in Exhibit #1 and site area photos in Exhibit #2).

**Project description** ... Removal of fugitive riprap located on the beach between the toe of an existing permitted seawall and the low water line; construction of a two-foot wide cutoff stem wall along the entire length of the existing seawall along three parcels (APNs 033-132-01, 033-132-02, and 033-132-03); excavation of a keyway followed by restacking of riprap along the toe of the bluff adjacent to the upcoast end of the existing seawall (APN 033-132-01) and extending onto an adjacent parcel (APN 033-151-24); perform future seawall/revetment repair and maintenance; removal of invasive nonnative vegetation inland of the existing seawall and replanting with native species.

**File documents** ..... Santa Cruz County certified Local Coastal Program (LCP); California Coastal Act; Santa Cruz County CDP file #92-0585.

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**NOTE:** Public Resources Code Section 30624 provides that this administrative coastal development permit shall not become effective until it is reported to the Commission at its next meeting. If one-third or more of the appointed membership of the Commission so request, the application will be removed from the administrative calendar and set for public hearing at a subsequent Commission meeting. Our office will notify you if such removal occurs. This permit will be reported to the Commission at the following time and place:

**May 9, 2008, 8:00 AM**  
**Marina del Rey Hotel**  
**13534 Bali Way**  
**Marina del Rey, CA**

**IMPORTANT: Before you may proceed with development, the following must occur:** You must sign the enclosed duplicate copy acknowledging the permit's receipt and accepting its contents, including all conditions, and return it to our office (Title 14, California Code of Regulations, Sections 13150(b) and 13158). Following the Commission's meeting, and once we have received the signed acknowledgment and evidence of compliance with all special conditions, we will send you a Notice of Administrative Permit Effectiveness. **Before you can proceed with development, you must have received both your administrative permit and the notice of permit effectiveness from this office.**

**PETER DOUGLAS**  
Executive Director

**By: DAN CARL**  
Central Coast District Manager

**EXECUTIVE DIRECTOR'S DETERMINATION:** THE FINDINGS FOR THIS DETERMINATION, AND FOR ANY SPECIAL CONDITIONS, APPEAR BELOW.

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## **I. STANDARD CONDITIONS**

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- 1. Notice of Receipt and Acknowledgment.** The permit is not valid and development shall not commence until a copy of the permit, signed by the Permittees or authorized agent, acknowledging receipt of the permit and acceptance of the terms and conditions, is returned to the Commission office.
- 2. Expiration.** If development has not commenced, the permit will expire two years from the date on which the Commission voted on the application. Development 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 Permittees to bind all future owners and possessors of the subject property to the terms and conditions.

## **II. SPECIAL CONDITIONS**

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- 1. Approved Project.** Subject to these standard and special conditions (including modifications to project plans required by them), the approved project is to remove fugitive riprap located on the beach between the toe of an existing permitted seawall and the low water line; to construct a two-foot wide cutoff stem wall along the entire length of the existing seawall along three parcels (APNs 033-132-01, 033-132-02, and 033-132-03); to excavate a keyway and restack riprap along the toe of

the bluff adjacent to the upcoast end of the existing seawall (APN 033-132-01) and onto an adjacent parcel (APN 033-151-24); to perform future seawall/revetment repair and maintenance; and, to remove invasive nonnative vegetation between the existing seawall and a line five feet inland of the blufftop edge and replant this area with native species, as described in and shown on the plans titled "Seawall Repair" by Soil Engineering Construction, Inc. dated October 8, 2007 and dated received in the Commission's Central Coast District Office October 18, 2007, and the plans titled "Coastal Bluff Landscape Plan" dated August 4, 2007 (see Exhibit #3).

- 2. Drainage.** PRIOR TO COMMENCEMENT OF CONSTRUCTION, the Permittees shall submit two copies of a revised drainage plan to the Executive Director for review and approval. The drainage plan shall clearly identify all permanent measures to be taken to collect bluff-top drainage and to direct it away from the bluff-top edge. Such measures may include collection systems such as cisterns (water collected in cisterns can be used for onsite irrigation needs), a sump pump system (to collect water and pump it to the street), installation of a low berm inland of and parallel to the bluff-top edge to prevent water from collecting at or flowing over the bluff edge, or a combination of these and other appropriate drainage collection and conveyance methods. In all cases, drainage shall not be allowed to pond directly at the bluff-top edge, sheet flow over the bluff seaward, or otherwise be directed seaward. All drainage pipes that extend over the blufftop or through the bluff edge shall be removed. Collected drainage may be used for landscape irrigation provided such irrigation use does not contribute to bluff instability in any way.
- 3. Landscaping.** PRIOR TO THE COMMENCEMENT OF CONSTRUCTION, the Permittees shall submit two copies of a revised landscaping plan to the Executive Director for review and approval. The revised landscaping plan shall be in substantial conformance with the landscaping plan submitted with the application (see page 4 of Exhibit #3) as modified to: (1) require the removal of all nonnative invasive vegetation between the seawall/revetment and a line 5 feet inland of the blufftop edge; and (2) require that all native plantings be maintained in good growing and coverage conditions, including replacement of plants as necessary, so as to maintain such landscaping in its approved state for the life of the project. The revised landscaping plan shall provide that if physical removal (including the root ball) of existing nonnative invasive vegetation on the bluff face (such as pampas grass) will compromise the integrity of the coastal bluff (in the opinion of a licensed civil engineer or engineering geologist with experience in coastal structures and processes), then the majority of the tops of such vegetation shall be removed (by cutting or other appropriate methods, thus leaving minimum plant material and the root ball intact), an appropriate herbicide shall be applied and reapplied to the remaining plant material until it has completely died, and native bluff species shall be aggressively planted or seeded around the remaining plant material.
- 4. Seawall Facing.** The exposed surface of the concrete seawall shall be painted and maintained in a mottled style that best replicates the range and variety of adjacent natural bluff colors (i.e. the painted seawall shall include an appropriate range of mottled hues (browns, greens, beiges, etc.) that best mimic the surrounding bluff face).
- 5. Construction Plan.** PRIOR TO COMMENCEMENT OF CONSTRUCTION the Permittees shall submit two sets of a Construction Plan to the Executive Director for review and approval. The Construction Plan shall, at a minimum, include the following:

- (a) **Construction Areas.** The Construction Plan shall identify the specific location of all construction areas, all staging areas, all storage areas, all construction access corridors (to the construction site and staging areas), and all public pedestrian access corridors. All such areas within which construction activities and/or staging are to take place shall be minimized to the maximum extent feasible in order to minimize construction encroachment on the beach, Opal Cliff Drive, and all beach access points, and to have the least impact on public access.
- (b) **Construction Methods and Timing.** The Construction Plan shall specify the construction methods to be used, including all methods to be used to keep the construction areas separated from public recreational use areas (including using the space available on the Permittees' properties inland of the existing seawall for staging, storage, and construction activities to the maximum extent feasible, and including using unobtrusive fencing (or equivalent measures) to delineate construction areas). All erosion control/water quality best management practices to be implemented during construction and their location shall be noted.
- (c) **Property Owner Consent.** The Construction Plan shall be submitted with written evidence indicating that the owners of any properties on which construction activities are to take place, including properties to be crossed in accessing the site, consent to such use of their properties.
- (d) **Construction Requirements.** The Construction Plan shall include the following construction requirements specified by written notes on the Construction Plan. Minor adjustments to the following construction requirements may be allowed by the Executive Director if such adjustments: (1) are deemed reasonable and necessary; and (2) do not adversely impact coastal resources.
- All work shall take place during daylight hours and lighting of the beach area is prohibited.
  - Construction work or equipment operations shall not be conducted below the mean high water line unless tidal waters have receded from the authorized work areas.
  - Grading of intertidal areas is prohibited with one exception as follows: existing rock that has migrated seaward of the revetment, that is naturally exposed, and that can be retrieved without substantial excavation of the surrounding sediments, shall be retrieved and reused or removed to an appropriate disposal site offsite. Any existing rock retrieved in this manner shall be recovered by excavation equipment positioned landward of the waterline (i.e., excavator equipment with mechanical extension arms).
  - Only rubber-tired construction vehicles are allowed on the beach, except track vehicles may be used if the Executive Director agrees that they are required to safely carry out construction. When transiting on the beach, all such vehicles shall remain as high on the upper beach as possible and avoid contact with ocean waters and intertidal areas.
  - All construction materials and equipment placed on the beach during daylight construction hours shall be stored beyond the reach of tidal waters. All construction materials and equipment shall be removed in their entirety from the beach area by sunset each day that work occurs (raised platforms located above the high water line may be used for equipment storage with adequate safety and resource protection precautions). The only other exceptions

shall be for erosion and sediment controls and/or construction area boundary fencing where such controls and/or fencing are placed as close to the toe of the seawall/revetment as possible, and are minimized in their extent, and for sand and rock materials which are being relocated.

- Construction (including but not limited to construction activities, and materials and/or equipment storage) is prohibited outside of the defined construction, staging, and storage areas.
- No work shall occur on the beach during weekends and/or the summer peak months (i.e., from the Saturday of Memorial Day weekend through Labor Day, inclusive) unless, due to extenuating circumstances (such as tidal issues or other environmental concerns), the Executive Director authorizes such work.
- Equipment washing shall not take place on the beach; refueling and/or servicing of equipment shall be allowed only at a designated location as noted on the Plan. Appropriate best management practices shall be used to ensure that no spills of petroleum products or other chemicals take place during these activities.
- The construction site shall maintain good construction site housekeeping controls and procedures (e.g., clean up all leaks, drips, and other spills immediately; keep materials covered and out of the rain, including covering exposed piles of soil and wastes; dispose of all wastes properly, place trash receptacles on site for that purpose, and cover open trash receptacles during wet weather; remove all construction debris from the beach; etc.).
- All erosion and sediment controls shall be in place prior to the commencement of construction as well as at the end of each workday. At a minimum, silt fences, or equivalent apparatus, shall be installed at the perimeter of the construction site to prevent construction-related runoff and/or sediment from entering into the Pacific Ocean.
- All beach areas and all beach access points impacted by construction activities shall be restored to their pre-construction condition or better within three days of completion of construction. Any beach sand impacted shall be filtered as necessary to remove all construction debris from the beach.
- The Permittees shall notify planning staff of the Coastal Commission's Central Coast District Office at least three working days in advance of commencement of construction, and immediately upon completion of construction.

All requirements above and all requirements of the approved Construction Plan shall be enforceable components of this coastal development permit. The Permittees shall undertake development in accordance with the approved Construction Plan. Any proposed changes to the Construction Plan shall be reported to the Executive Director. No changes to the approved Construction Plan shall occur without a Commission amendment to this permit unless the Executive Director determines that no amendment is necessary.

6. **MBNMS Review.** PRIOR TO COMMENCEMENT OF CONSTRUCTION, the Permittees shall submit to the Executive Director for review a copy of the Monterey Bay National Marine Sanctuary

(MBNMS) permit, letter of permission, or evidence that no MBNMS permit is necessary. Any changes to the approved project required by the Sanctuary shall be reported to the Executive Director. No changes to the approved project shall occur without a Commission amendment to this coastal development permit unless the Executive Director determines that no amendment is necessary.

- 7. State Lands Commission Authorization.** PRIOR TO COMMENCEMENT OF CONSTRUCTION, the Permittees shall submit to the Executive Director for review a copy of the State Lands Commission authorization to allow the project, or evidence that no State Lands Commission authorization is necessary.
- 8. Construction Site Documents & Construction Coordinator.** DURING ALL CONSTRUCTION:
  - (a) Construction Site Documents.** Copies of the signed coastal development permit and the approved Construction Plan shall be maintained in a conspicuous location at the construction job site at all times, and such copies shall be available for public review on request. All persons involved with the construction shall be briefed on the content and meaning of the coastal development permit and the approved Construction Plan, and the public review requirements applicable to them, prior to commencement of construction.
  - (b) Construction Coordinator.** A construction coordinator shall be designated to be contacted during construction should questions arise regarding the construction (in case of both regular inquiries and emergencies), and their contact information (i.e., address, phone numbers, etc.) including, at a minimum, a telephone number that will be made available 24 hours a day for the duration of construction, shall be conspicuously posted at the job site where such contact information is readily visible from public viewing areas, along with the indication that the construction coordinator should be contacted in the case of questions regarding the construction (in case of both regular inquiries and emergencies). The construction coordinator shall record the name, phone number, and nature of all complaints received regarding the construction, and shall investigate complaints and take remedial action, if necessary, within 24 hours of receipt of the complaint or inquiry.
- 9. Development Completion.** BY MAY 9, 2010, all the components of the approved project (except for future seawall/revetment repair and maintenance pursuant to this coastal development permit) shall be constructed/completed. Completion shall be verified and confirmed by the Executive Director.
- 10. As-Built Plans.** WITHIN THREE MONTHS OF COMPLETION of all the components of the approved project (except for future seawall/revetment repair and maintenance), the Permittees shall submit two sets of As-Built Plans to the Executive Director for review and approval. The plans shall clearly identify the as-built construction of the two-foot wide cutoff wall and seawall; the keyway construction and restacked riprap revetment along the toe of the bluff adjacent to the upcoast end of the seawall; the removal of invasive nonnative vegetation inland of the existing seawall and replanting with native species; and all related development, including residential development, in site plan and cross section views substantially in conformance with the Project Plans as augmented by the following:

- (a) **Seawall/Revetment.** The portion of the As-Built Plans covering the construction of the two-foot-wide cutoff stem wall and seawall and the upcoast riprap revetment shall be prepared by a licensed civil engineer or engineering geologist with experience in coastal structures and processes, and shall include all of the following as enforceable plan notes in relation to future monitoring and maintenance: (i) all seawall and riprap revetment maintenance parameters identified under "Future Monitoring and Maintenance" below; (ii) all construction plan requirements identified under "Construction Plan" above; and (iii) all construction site document and coordinator requirements identified under "Construction Site Documents & Construction Coordinator" above.
- (b) **Benchmark.** The As-Built Plans shall identify at least one immovable surveyed benchmark location, including its elevation, for use in future monitoring efforts.
- (c) **Photographs.** The As-Built Plans shall include clear color photographs of the as-built two-foot-wide cutoff stem wall and seawall and upcoast riprap revetment and all related development with the date and time of the photographs and the location of each photographic viewpoint noted on a site plan. At a minimum, the site shall be photographed from a sufficient number of viewpoints as to provide complete photographic coverage of the seawall and upcoast riprap revetment and all related development at a scale that allows comparisons to be made with the naked eye between photographs taken in different years from the same vantage points, including at a minimum from the following locations: upcoast, seaward, and downcoast beach viewpoints; representative locations on the Privates accessway, including the stairway; and the entire beach area along the seawall and upcoast riprap revetment. All photographs shall be accompanied by electronic versions of the photographs in jpg format.
- (d) **NGVD.** All elevations shall be described in relation to National Geodetic Vertical Datum (NGVD).

- 11. Maintenance Required.** It is the Permittees' responsibility: (i) to maintain the approved seawall, upcoast revetment, and required native vegetation in a sound manner and in their approved state; (ii) to retrieve rocks that move seaward of the revetment and either restack them (within the approved revetment footprint and profile) or dispose of them at a suitable inland disposal location as soon as is feasible after discovery of the rock movement; and (iii) to remove all debris that may fall from the area seaward of the residences and accumulate in or on the seawall or revetment or seaward of these areas.
- 12. Rodents.** If at any time evidence indicates that rodents are living in the voids within the riprap revetment, then the Permittees' shall take reasonable action to eliminate such rodent colonization consistent with generally accepted professional pest control methods that also ensure the health and safety of the public.
- 13. No Further Seaward Encroachment.** Any future development, as defined in Section 30106 ("Development") of the Coastal Act, on the subject parcels, including but not limited to modifications to the seawall and the upcoast riprap revetment, shall be constructed inland of, and shall be prohibited seaward of, the sloped faces of the seawall and the upcoast riprap revetment with the following development excepted from this prohibition: (i) appropriately permitted construction activities associated with construction, maintenance, or repair of the seawall and upcoast riprap

revetment, and/or landscaping approved by coastal development permit; and (ii) standard beach maintenance activities.

**14. Future Shoreline Planning.** There may be future shoreline armoring planning efforts that involve the seawall and upcoast riprap revetment as shown on the approved As-Built Plans. Such planning efforts may involve consideration of a shoreline armoring management entity meant to cover the larger shoreline that includes the revetment, and may involve consideration of potential modifications and/or programs designed to reduce public viewshed and beach access impacts due to shoreline armoring. The Permittees agree to participate in such planning efforts. Agreeing to participate in no way binds the Permittees (nor any successors and assigns) to any particular outcome of such planning efforts nor to any financial commitment, and in no way limits their ability to express their viewpoints during the course of such planning efforts.

**15. Public Rights.** The issuance of this coastal development permit shall not constitute a waiver of any public rights which may exist on the subject properties. The Permittees shall not use such permit as evidence of a waiver of any public rights that may exist on the properties.

**16. Assumption of Risk, Waiver of Liability and Indemnity Agreement.** The Permittees acknowledge and agree, on behalf of themselves and all successors and assigns: (i) that these sites are subject to extreme coastal hazards including but not limited to episodic and long-term shoreline retreat and coastal erosion, high seas, ocean waves, storms, tsunamis, and coastal flooding; (ii) to assume the risks to the Permittees and the properties that are the subject of this permit of injury and damage from such hazards in connection with this permitted development; (iii) to unconditionally waive any claim of damage or liability against the Commission, its officers, agents, and employees for injury or damage from such hazards; (iv) to indemnify and hold harmless the Commission, its officers, agents, and employees with respect to the Commission's approval of the project against any and all liability, claims, demands, damages, costs (including costs and fees incurred in defense of such claims), expenses, and amounts paid in settlement arising from any injury or damage due to such hazards; and (v) that any adverse effects to property caused by the permitted project shall be fully the responsibility of the landowners.

**17. Monitoring and Reporting.** The Permittees shall ensure that the condition and performance of the approved as-built seawall repair and upcoast riprap revetment are regularly monitored by a licensed civil engineer with experience in coastal structures and processes. Such monitoring evaluation shall at a minimum address whether any significant weathering or damage has occurred that would adversely impact future performance, and identify any structural damage requiring repair to maintain the approved as-built seawall and upcoast riprap revetment profiles. Monitoring reports prepared by a licensed civil engineer with experience in coastal structures and processes, and covering the above-described evaluations, shall be submitted to the Executive Director for review and approval at five year intervals by May 1st of each fifth year (with the first report due May 1, 2015, and subsequent reports due May 1, 2020, May 1, 2025, and so on) for as long as the seawall and upcoast riprap revetment exist at this location. The reports shall identify the existing configuration and condition of the seawall and the riprap revetment, drainage system, and required landscaping, shall recommend actions necessary to maintain these project elements in their approved and/or required state, and shall include photographs taken from each of the same vantage points required in the As-Built Plans



with the date and time of the photographs and the location of each photographic viewpoint noted on a site plan.

**18. Future Revetment Maintenance Authorized.** This coastal development permit authorizes future seawall and upcoast riprap revetment maintenance and repair subject to the following:

- (a) **Maintenance.** “Maintenance,” as it is understood in this special condition, means development that would otherwise require a coastal development permit whose purpose is: (1) to reestablish or place rock within the permitted footprint and/or profile of the upcoast riprap revetment structure as shown on the approved As-Built Plans; (2) to reestablish the permitted drainage, vegetation, and/or irrigation elements inland of the seawall and upcoast riprap revetment; (3) to retrieve any rocks that move seaward of the upcoast riprap revetment footprint and/or profile; and/or (4) to remove all debris that may fall from the area seaward of the residences and accumulate in or on top of the seawall and the upcoast riprap revetment or seaward of them.
- (b) **Other Agency Approvals.** The Permittees acknowledges that these maintenance stipulations do not obviate the need to obtain permits from other agencies for any future maintenance and/or repair episodes.
- (c) **Maintenance Notification.** At least two weeks prior to commencing any maintenance event, the Permittees shall notify, in writing, planning staff of the Coastal Commission’s Central Coast District Office. The notification shall include: a detailed description of the maintenance event proposed; any plans, engineering and/or geology reports describing the event; a construction plan that complies with all aspects of the Construction Plan described above; identification of a construction coordinator and his/her contact information (i.e., address, phone numbers, etc.) as described above; other agency authorizations; and any other supporting documentation (as necessary) describing the maintenance event. The maintenance event shall not commence until the Permittees have been informed by planning staff of the Coastal Commission’s Central Coast District Office that the maintenance event complies with this coastal development permit. If the Permittees have not been given a verbal, or sent a written, response within 30 days of the notification being received in the Central Coast District Office, the maintenance event shall be authorized as if planning staff affirmatively indicated that the event complies with this coastal development permit. The notification shall clearly indicate that the maintenance event is proposed pursuant to this coastal development permit, and that the lack of a response to the notification within 30 days constitutes approval of it as specified in the permit. In the event of an emergency requiring immediate maintenance, the notification of such emergency episode shall be made as soon as possible, and shall (in addition to the foregoing information) clearly describe the nature of the emergency.
- (d) **Maintenance Coordination.** Maintenance events shall, to the degree feasible, be coordinated with other maintenance events proposed in the immediate vicinity with the goal being to limit coastal resource impacts, including the length of time that construction occurs in and around the beach area and beach access points. As such, the Permittees shall make reasonable efforts to coordinate the Permittees’ maintenance events with other adjacent events, including adjusting maintenance event scheduling as directed by planning staff of the Coastal Commission’s Central Coast District Office.

- (e) **Construction Site Documents and Construction Coordinator.** All requirements set forth above under “Construction Site Documents & Construction Coordinator” shall apply to any maintenance event.
- (f) **Restoration.** The Permittees shall restore all beach areas and all beach access points impacted by construction activities to their pre-construction condition or better. Any beach sand impacted shall be filtered as necessary to remove all construction debris from the beach within three days of completion of construction. The Permittees shall notify planning staff of the Coastal Commission’s Central Coast District Office upon completion of beach-area restoration activities to arrange for a site visit to verify that all beach-area restoration activities are complete. If planning staff should identify additional reasonable measures necessary to restore the beach and beach access points, such measures shall be implemented as quickly as reasonably possible.
- (g) **Noncompliance Proviso.** If the Permittees are not in compliance with the terms and conditions of any Coastal Commission coastal development permits or other coastal authorizations that apply to the subject properties at the time that a maintenance event is proposed, then the maintenance event that might otherwise be allowed by the terms of this future maintenance condition shall not be allowed by this condition until the Permittees are in full compliance with those terms and conditions.
- (h) **Emergency.** In addition to the emergency provisions set forth in subsection (c) above, nothing in this condition shall serve to waive any Permittee rights that may exist in cases of emergency pursuant to Coastal Act Section 30611, Coastal Act Section 30624, and Subchapter 4 of Chapter 5 of Title 14, Division 5.5, of the California Code of Regulations (Permits for Approval of Emergency Work).
- (i) **Duration of Covered Maintenance.** Future revetment maintenance under this coastal development permit is allowed subject to the above terms until December 31, 2018. Maintenance can be carried out beyond December 31, 2018 if the Permittees request an extension prior to December 31, 2018 and if the Executive Director extends the maintenance term in writing. The intent of this permit is to regularly allow for 10-year extensions of the maintenance term unless there are changed circumstances that may affect the consistency of this revetment maintenance authorization with the policies of Chapter 3 of the Coastal Act and thus warrant a re-review of this permit.

**19. Deed Restriction.** WITHIN TEN (10) DAYS AFTER THE DATE THAT THIS PERMIT BECOMES EFFECTIVE, the Permittees shall submit to the Executive Director for review and approval documentation demonstrating that the Permittees have executed and recorded against the subject properties governed by this permit (i.e., APNs 033-132-01, 033-132-02, 033-132-03) a deed restriction, in a form and content acceptable to the Executive Director: (1) indicating that, pursuant to this permit, the California Coastal Commission has authorized development on the subject properties subject to terms and conditions that restrict the use and enjoyment of said properties; and (2) imposing the Conditions of this permit as covenants, conditions and restrictions on the use and enjoyment of said properties. The deed restriction shall include a legal description of the properties governed by this permit. The deed restriction shall also indicate that, in the event of an extinguishment or termination of the deed restriction for any reason, the terms and conditions of this permit shall continue to restrict the use and enjoyment of the said properties so long as either this

permit or the development this permit authorizes, or any part, modification, or amendment thereof, remains in existence on or with respect to said properties.

**20. Declaration of Upcoast Property Owner(s) (APN 033-151-24).** PRIOR TO COMMENCEMENT OF CONSTRUCTION, the Permittees shall submit to the Executive Director, for review and approval, written documentation that the owner(s) of APN 033-151-24 have acknowledged and agreed that the Permittees may access and perform the development authorized by this permit on the upcoast property (APN 033-151-24), i.e. excavation of a keyway followed by restacking of riprap along the toe of the bluff adjacent to the upcoast end of the existing seawall, and future repair and maintenance of same.

### **III. EXECUTIVE DIRECTOR'S DETERMINATION**

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The Executive Director hereby determines that the proposed development is a category of development that qualifies for approval by the Executive Director through the issuance of an administrative permit (Public Resources Code Section 30624). Subject to Standard and Special Conditions as attached, said development is in conformity with the provisions of Chapter 3 of the Coastal Act of 1976, and will not have any significant adverse effects on the environment within the meaning of the California Environmental Quality Act.

### **IV. FINDINGS FOR EXECUTIVE DIRECTOR'S DETERMINATION**

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#### **1. Project Location**

The project is located at the base of the Opal Cliff bluffs in the unincorporated Live Oak area in Santa Cruz County. Opal Cliffs is the name for the area extending roughly from 41st Avenue in Live Oak to the Capitola city limits (see Exhibit #1 for project location maps). This stretch of coastline is exclusively described by a row of private residential properties that are perched atop the bluffs located seaward of Opal Cliff Drive, which is the first through public road. As a result, seaward public views and access from Opal Cliff Drive have been extremely curtailed. The proposed project site is located along four parcels on the beach and lower bluffs that form the back-beach area for a pocket beach known locally as Key Beach or Privates Beach. The beach here is accessed by a locked stairway from Opal Cliff Drive for which keys can be purchased from the local recreation district for Opal Cliffs. The beach and access thereto provide the only direct vertical accessway for the roughly one-mile stretch of coastline between 41st Avenue (upcoast) and Hooper Beach in Capitola (downcoast). Some lateral beach-level access to the pocket beach at this location is also available from both up and down coast, but such access is generally limited to very low tides due at least in part to the large piles of riprap and rubble that front much of the Opal Cliff bluffs. The majority of the bluffs along Key Beach/Privates are armored at their base by an eclectic mix of rip rap, concrete cylinders, stepped concrete retaining walls, a wooden wall, and a variety of vertical concrete seawalls. The subject properties exemplify the armoring variety at this beach with the base of the roughly 50-to-60-foot-tall bluffs fronting the four parcels occupied by a concrete seawall structure on three of the parcels, as well as by rock that spills over onto the beach area. Riprap existed along the base of the bluff along these parcels prior to the coastal permitting requirements of Proposition 20 ("The Coastal Initiative") and the Coastal Act. Additional riprap was installed in 1993,

along with the concrete seawall structure, pursuant to County coastal development permit #92-0585. Thus the seawall and fronting revetment are coastal permitted structures, and the subject revetment adjacent to and upcoast of the seawall predates coastal permitting requirements. See Exhibit #2 for photographs of the project site.

## **2. Project Description**

The proposed project includes removal of riprap located on the beach between the toe of the existing permitted seawall and the low water line. This riprap was permitted as part of the seawall structure in 1993 as toe scour protection, but has fallen into disrepair. As a result, the toe of the existing seawall has been undermined. The riprap toe protection would be replaced by a two-foot-wide cutoff stem wall along the entire length of the existing seawall along three parcels (APNs 033-132-01, 033-132-02, and 033-132-03). The cutoff stem wall will be embedded into the bedrock platform and structurally attached to the seawall. All visible components of the seawall will be colored so as to blend with the adjacent existing bluff face. Because the upcoast end of the seawall has been outflanked by wave erosion of the exposed bluff toe, the proposed project also includes excavation of a keyway followed by restacking of riprap along the toe of the bluff adjacent to the upcoast end of the existing seawall (APN 033-132-01) and extending onto an adjacent parcel (APN 033-151-24).<sup>1</sup> The project also includes removal of invasive nonnative vegetation between the existing seawall and a line five feet inland of the bluff-top edge, and replanting with native species in this area, as well as drainage improvements. The proposed project also includes standards for future seawall/revetment repair and maintenance. The proposed project results in replacement of less than 50% of the seawall/revetment structure and thus does not constitute a replacement structure (per California Code of Regulations Section 13252). For project plans please see Exhibit #3.

## **3. Coastal Act Consistency**

The main issues raised by this application are consistency with the shoreline hazards, viewshed/character, public access, and recreation policies of the Coastal Act (Sections 30210-30224, 30235, and 30250-30253). The site is dynamic and is subject to storm surge and wave run-up with subsequent bluff and beach erosion. The site also constitutes an important public beach and access destination. The existing seawall and rock toe at this location are recognized by a previously-issued coastal permit, and the upcoast rock predates coastal permitting requirements. However, responding to the hazard danger at this location must still take into account the special beach location so that public views and public recreational access are not adversely impacted.

The Applicants' proposed project mostly strikes an appropriate balance that provides the Applicants a repair of the upcoast revetment that will relocate rock from the outlying beach area to be as close to the bluff as possible. Additionally, all existing riprap located seaward of the existing seawall will be removed from the beach and replaced with a stem wall that will occupy less beach area. These two

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<sup>1</sup> The owners of APN 033-151-24 are not willing to be co-Applicants for the project; these owners, however, have informed the Applicants' representative that they will allow excavation of the keyway and restacking of riprap to take place on their parcel, and are also willing to accept any terms and conditions of this coastal permit. Commission legal staff indicates that such an arrangement is appropriate if it is made enforceable through this permit. Special Condition #20 requires evidence that the owners of parcel 033-151-24 will allow the proposed keyway excavation and restacking of riprap to take place on this parcel, as well as future repair and maintenance activities authorized by this permit. Special Condition #19 requires recordation of a deed restriction acknowledging the terms and conditions of this permit on the other three parcels involved.

components of the project will thus restore large areas of the beach for public recreational use and enjoyment. The project also includes visual treatment of the seawall to offset visual impacts; bluff vegetation enhancement, including removal of nonnative invasive species; drainage enhancement; construction BMPs; commitments for no further seaward encroachment; submittal of as-built plans; future monitoring, maintenance, and reporting; assumptions of risk; and a deed restriction to record the terms and conditions of the permit against the subject properties. These proposed project components are all implemented through the special conditions.<sup>2</sup> However, there remain several issues with respect to finding Coastal Act consistency.

The primary remaining issues not completely addressed by the project as proposed relate to landscaping, drainage, and camouflaging of the seawall and revetment structures. With respect to landscaping, the Applicants proposal to remove invasive plant species and plant noninvasive native (to the Opal Cliffs bluff area) species in the area between the seawall/revetment (where the terrace deposits start on the bluff face) and a line at least 5 feet inland of the bluff edge, should result in both visual enhancement and better bluff stability (as the long-rooted natives take hold). However, the portion of the proposal to retain pampas grass to ostensibly avoid destabilizing soils by pulling this species out is inappropriate. If left in place, the success of the native plant enhancement would be compromised, and the pampas grass would continue to contribute seed stock to the areas surrounding the site as well, leading to the potential for more pampas grass in the vicinity that would potentially take over native bluff species along Opal Cliffs overall. This species can be removed without pulling out the roots (along with clumps of soil) from the bluff (e.g., through cutting to the stumps, and herbicide application and reapplication to eradicate the stumps/roots in place where they can decompose and be overtaken by the native planting palette). This approval is conditioned to require the removal of all nonnative invasive plants, including the pampas grass (as described above), and replanting or reseeding (including by hydroseeding or drill seeding if necessary) with native local species (see Special Condition #3).

In terms of the drainage issue, the Applicants propose to collect drainage and direct it over the bluff edge by a series of dangling pipes. Such pipes could probably be designed in such a way as to deposit collected runoff onto the seawall/revetment in such a way as to avoid erosion, but they would result in a significant visual impact as seen from the beach below because they would be inconsistent with the natural bluff aesthetic, including the revised native landscaping that would be planted and maintained in this area. The drainage would also adversely affect beach recreational access users if it were to spill out onto them (albeit this would be expected to be a lesser impact given that most of the drainage being deposited would likely be deposited during wet weather times when the beach was not being heavily used). The bluff-top portion of the site is fairly level, and front yard and front-of-the-house portions of site drainage make its way to the street fronting the properties currently. There is ample space to accommodate and control drainage at this location, and there are clearly design options that can avoid drainage being directed over the bluff-top edge. Design options include small landscaped berms near the bluff-top edge to avoid any sheet flow going over the bluff edge; collection pipes directed by gravity to more inland detention basins (near the street) where drainage could be allowed to infiltrate the soils or could be pumped by sumps to the street; collection directed to cisterns that could be used for onsite

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<sup>2</sup> The proposed project description has been submitted in a format that is similar to Coastal Commission special conditions for projects like this one. In other words, the project as proposed includes special condition-type requirements that are necessary for finding it consistent with the Coastal Act. In order to ensure that this project description is fully implemented, and that its parameters are clearly understood as being required terms and conditions for finding this project consistent with the Coastal Act and approving this CDP, special conditions are attached that generally mimic the project description language.

landscaping water needs; and permutations of all of these as well as other options (like reducing areas of impervious surface, redesigned roof catchment systems, etc.). This approval is conditioned for a revised drainage system that eliminates any drainage pipes extending over the bluffs of the subject properties (see Special Condition #2).

In terms of camouflaging the seawall/revetment, the proposal to paint the now grey concrete seawall a bluff color will help offset its imposing presence in the back-beach area, but it and the revetment will continue to result in adverse visual impacts at this location. These structures are distinctly unnatural and do not blend into a natural bluff setting (see photos in Exhibit #2). The bluff plantings described above will help soften the impact somewhat, but because they will be separated from these structures by the purisima sandstone area that does not generally support much (if any) vegetation, the landscaping cannot offset this impact. Options that can be pursued to mitigate this visual impact include capping the revetment and/or the seawall with soil that could be planted with cascading species capable of providing some screening, but this option is not feasible at this location given the height of these structures relative to wave run-up, and the likely need for almost continual replacement over time. The same applies to the option of pushing beach sand up over the base of the structures to better hide them, including because of the effect that this would also have on public recreational beach use. Another option typically required by the Commission with respect to seawalls at least is the option of facing the seawall with a sculpted concrete surface treatment that is colored and shaped to replicate a natural bluff. This option works well with new structures, and even with lesser mass concrete gravity walls, but the wall in this case extends significantly from the bluff, includes a large wave return, and is decidedly angular and unnatural in shape. A surface treatment designed to appear bluff-like would require significant concrete work, including likely additional areas of beach coverage to better approximate a natural landform, and may not appear “natural” in the end. Likewise, even a more limited surface treatment that does not much alter the basic shape of the wall would not be able to change its visual impact much due to its current configuration. For these reasons, the most feasible option to address the need for better camouflaging in this case is probably limited to a painting option. That said, as opposed to a single color option as proposed, this approval is conditioned for the seawall to be painted and maintained in a more mottled style that better replicates the range of bluff colors present here (i.e., hues of browns, greens, beiges, etc.), and the interplay of them naturally (see Special Condition #4).

In conclusion, the existing seawall and rock toe at this location are recognized by a previously-issued coastal permit, and the upcoast rock predates coastal permitting requirements. The proposed project results in replacement of less than 50% of the seawall/revetment structure and thus does not constitute a replacement structure. The project includes, and the permit conditions further enhance and require, significant mitigations that will reduce existing coastal resource impacts at this location including by removing revetment rock from a significant area of beach and making this area available for beach recreational access; by keying in remaining revetment rock at the upcoast end of the project area so as to minimize public beach access and safety issues with rock migration into the beach area and repeated maintenance associated with same; by camouflaging the seawall structure to better blend into the back beach environment; by removing significant amounts of invasive nonnative species in the bluff area and replacing such species with native bluff species appropriate to the area that should result in both enhanced bluff stability from long-rooted native species, as well as public viewshed enhancement associated with returning the bluff to a natural vegetation state; by upgrading drainage to both improve stability and enhance the public viewshed by removing unsightly drainage pipes dangling over the bluff; by incorporating appropriate construction BMPs to protect coastal resources in a difficult construction

environment; by requiring that there be no further seaward encroachment in the future so as to best protect the beach area for public use; by requiring submittal of as-built plans to be used as a cornerstone for required future monitoring, maintenance, and reporting; by ensuring that the property owners assume all risks for developing at a site like this that is subject to extreme coastal hazards; and by ensuring that the terms and conditions of the permit are recorded against the subject properties to provide proactive notice as to the way that these terms and conditions affect the use and enjoyment of these properties. In sum, the project as conditioned appropriately avoids coastal resources impacts as much as possible, and mitigates for those that are unavoidable, and is consistent with the Coastal Act.

#### **4. California Environmental Quality Act (CEQA)**

Section 13096 of the California Code of Regulations requires that a specific finding be made in conjunction with coastal development permit applications showing the application to be consistent with any applicable requirements of 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 that the activity may have on the environment.

The Coastal Commission's review and analysis of land use proposals has been certified by the Secretary of Resources as being the functional equivalent of environmental review under CEQA. The preceding administrative coastal development permit findings discuss the relevant coastal resource issues with the proposal, and the permit conditions identify appropriate modifications to avoid and/or lessen any potential for adverse impacts to said resources. All public comments received to date have been addressed in the findings above, which are incorporated herein in their entirety by reference.

As such, there are no additional feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse environmental effects which approval of the proposed project, as conditioned, would have on the environment within the meaning of CEQA. Thus, if so conditioned, the proposed project will not result in any significant environmental effects for which feasible mitigation measures have not been employed consistent with CEQA Section 21080.5(d)(2)(A).

**V. ACKNOWLEDGMENT OF PERMIT RECEIPT/ACCEPTANCE OF CONTENTS**

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I/We acknowledge that I/we have received a copy of this permit and have accepted its contents including all conditions.

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Signature of Applicant (Jennifer S. Krach)

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Date of signing

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Signature of Applicant (Michael N. Inglis)

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Date of signing

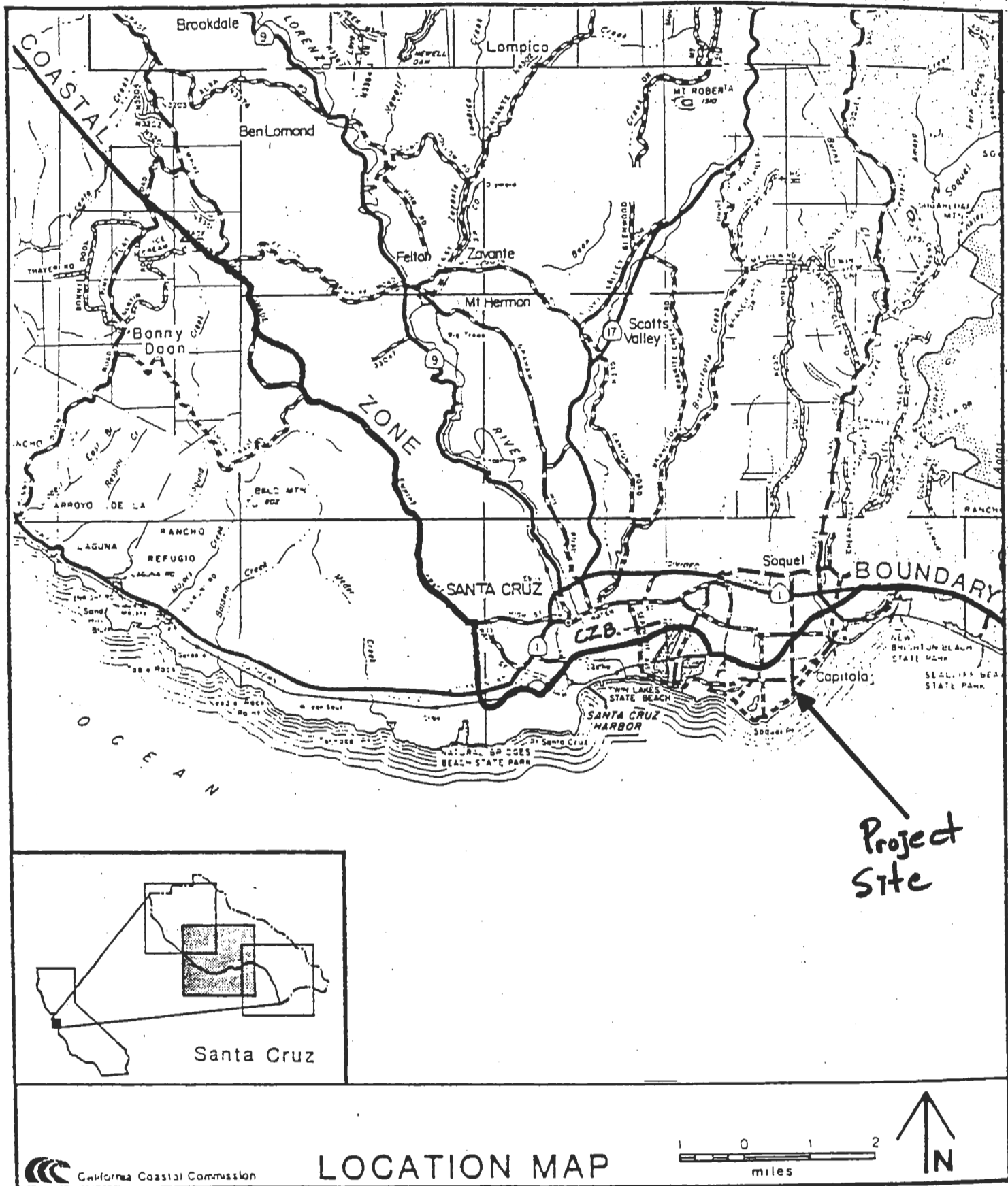
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Signature of Applicant (John C. Laing)

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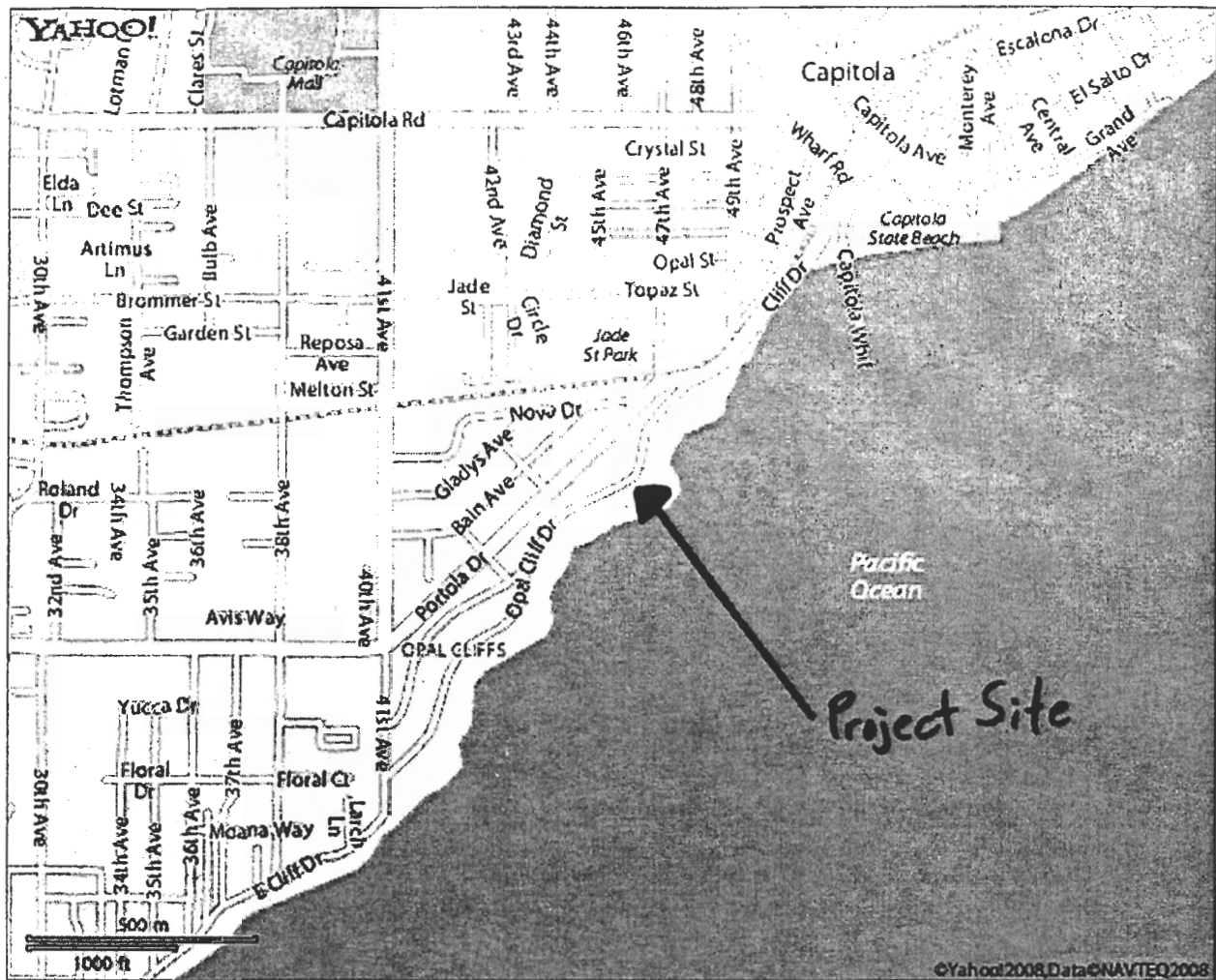
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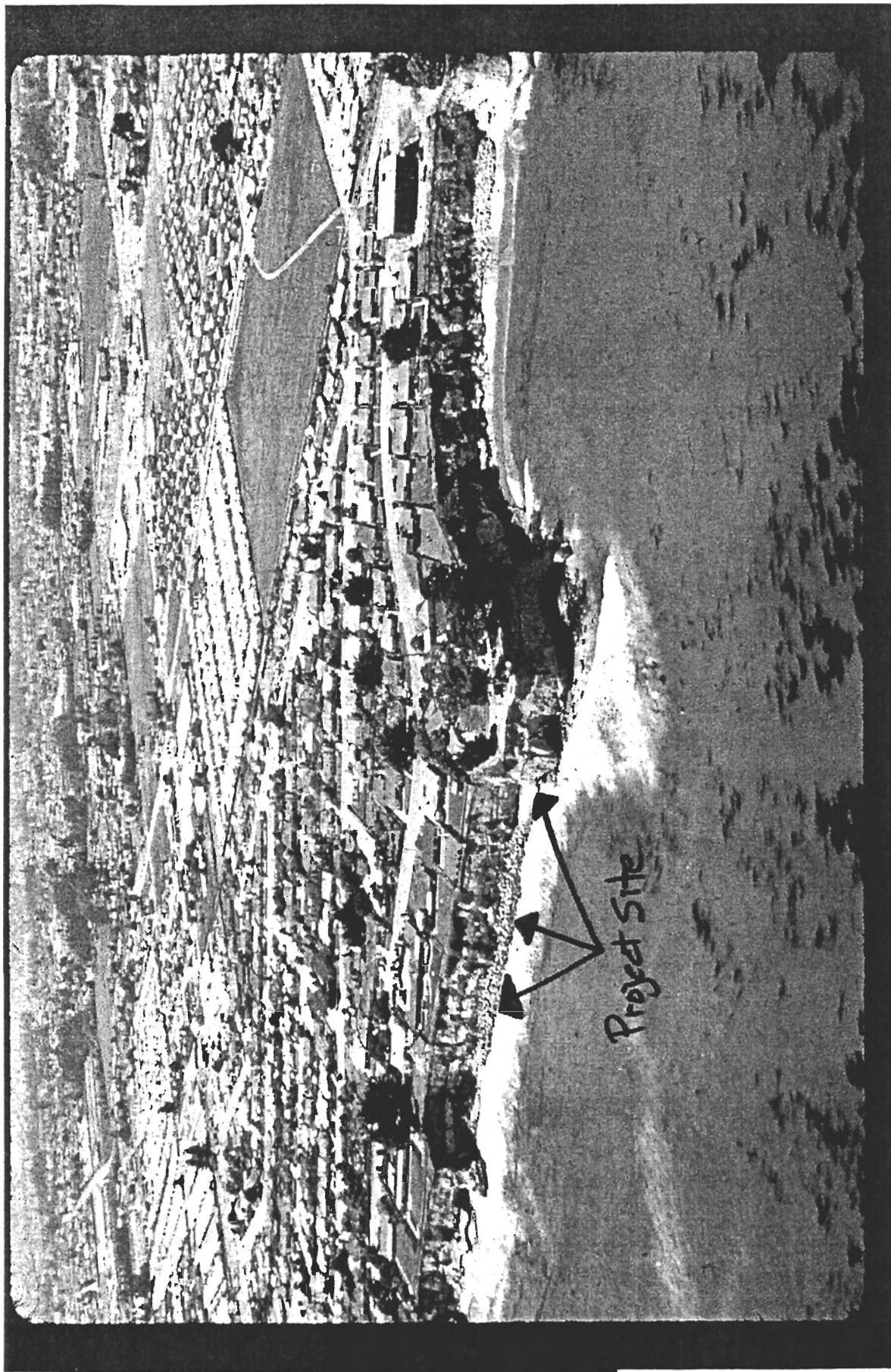
County of Santa Cruz

CCC Exhibit 1  
(page 1 of 2 pages)



California Coastal Records Project

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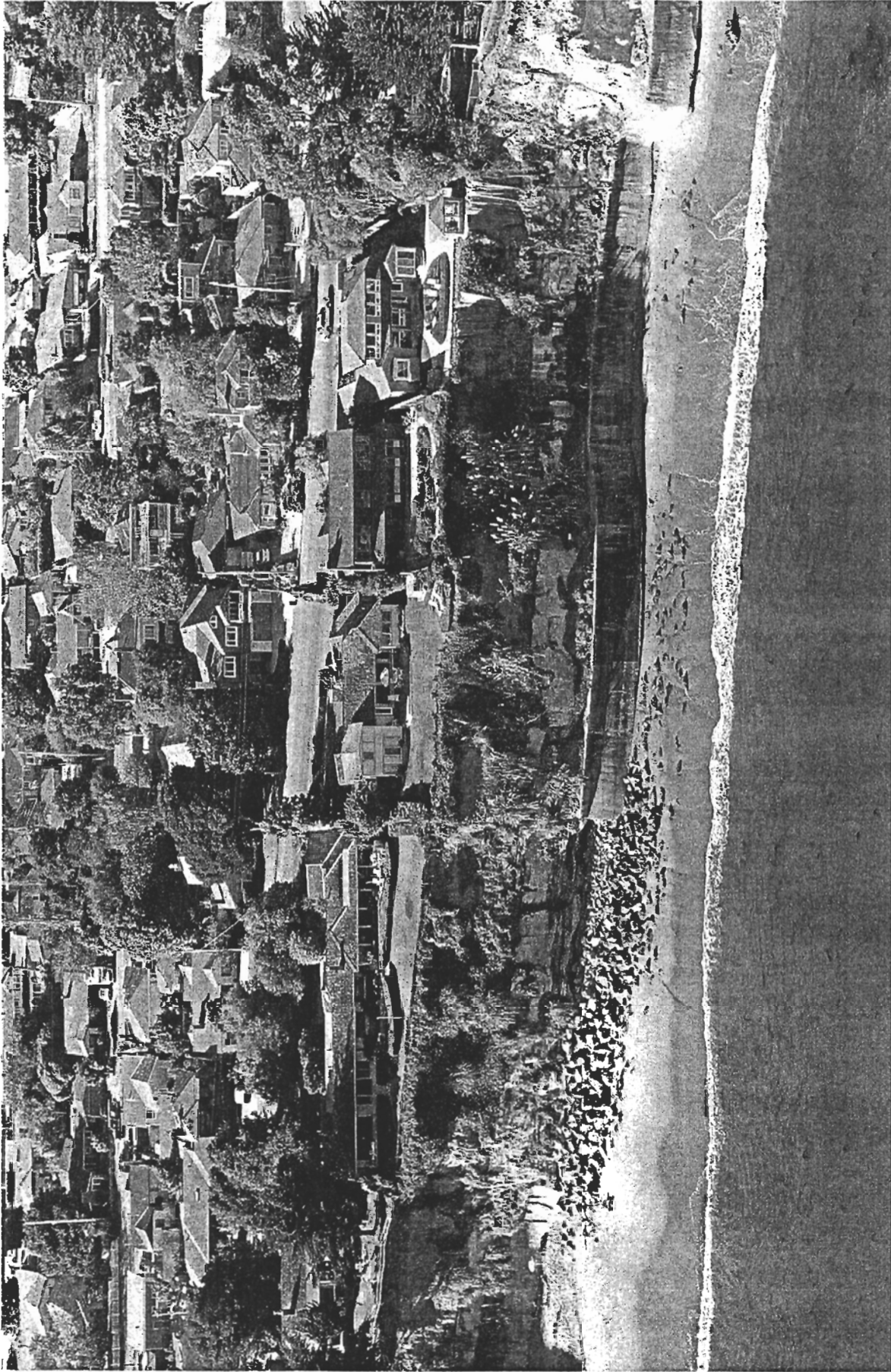


1972 07 12 04:21:13 Image 7220092 - 1972

Aerial Photograph - 1972

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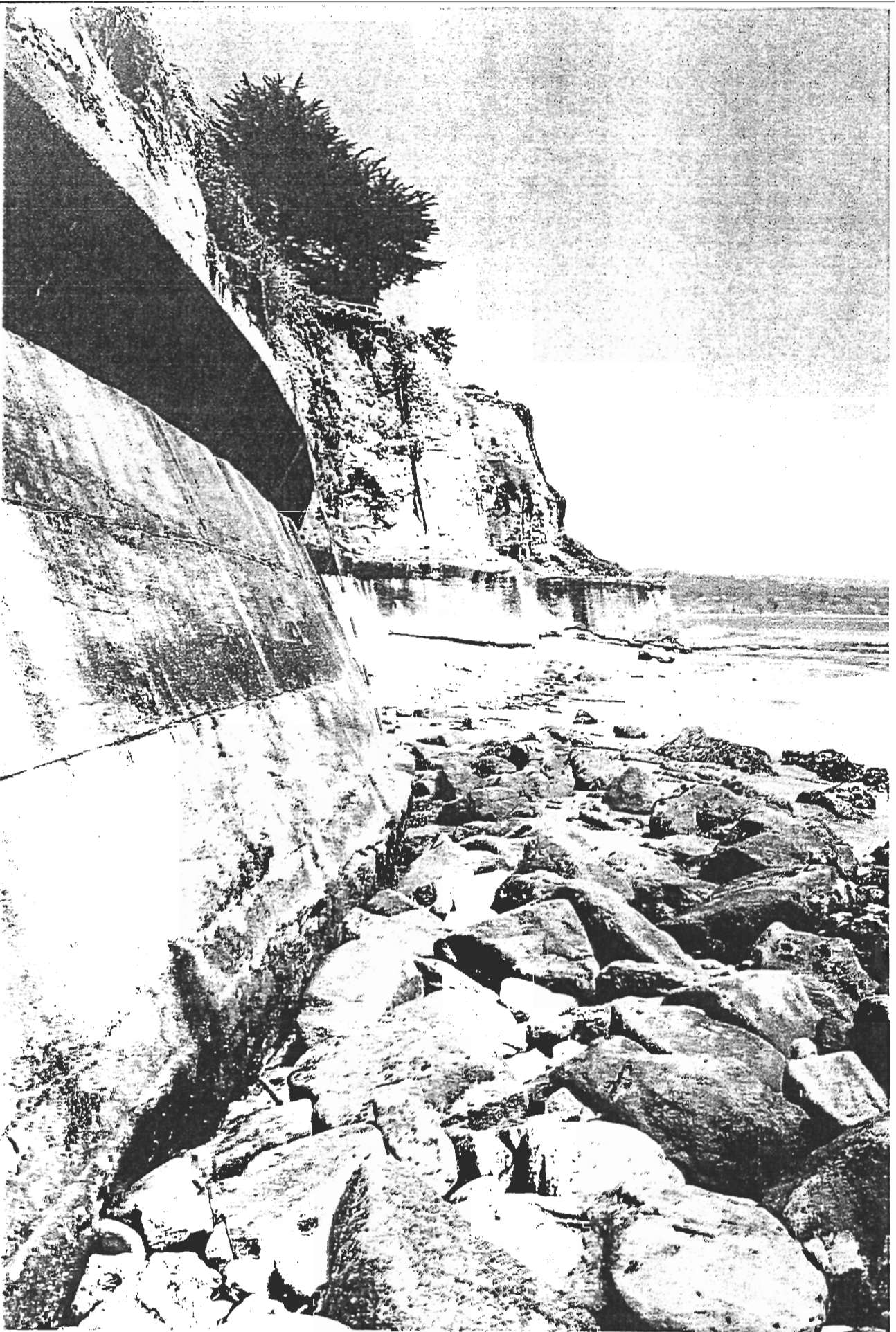


200507144 - Image 200507144 - "Opal Cliff Drive, Santa Cruz"

Aerial Photograph - 2005  
Project Site

CCC Exhibit 2  
(page 2 of 3 pages)





4610 Opal Cliff - downcoast view

# SEAWALL REPAIR

PREPARED FOR:  
**LAING, INGLIS & KRACH PROPERTIES**

PROJECT ADDRESS:

**4610, 4630 & 4640 OPAL CLIFF DRIVE, CAPITOLA,  
SANTA CRUZ COUNTY, CALIFORNIA**

**APN 033-132-01, 02 & 03**

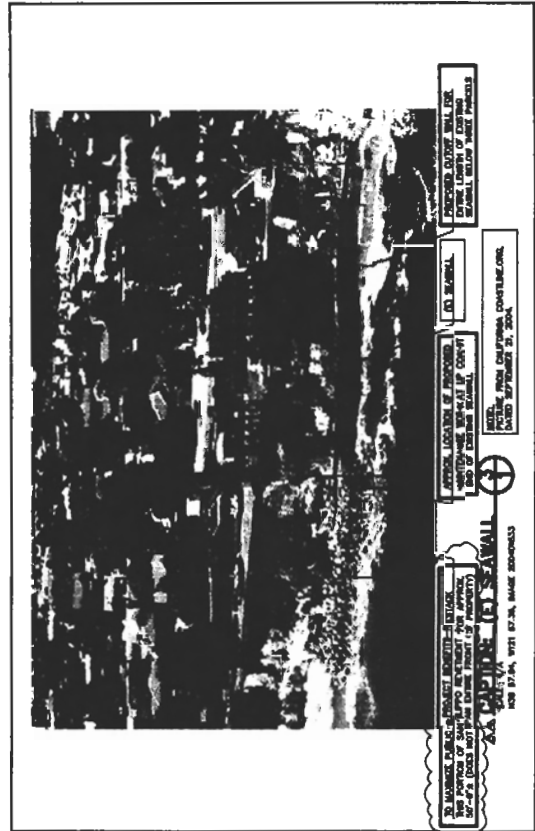
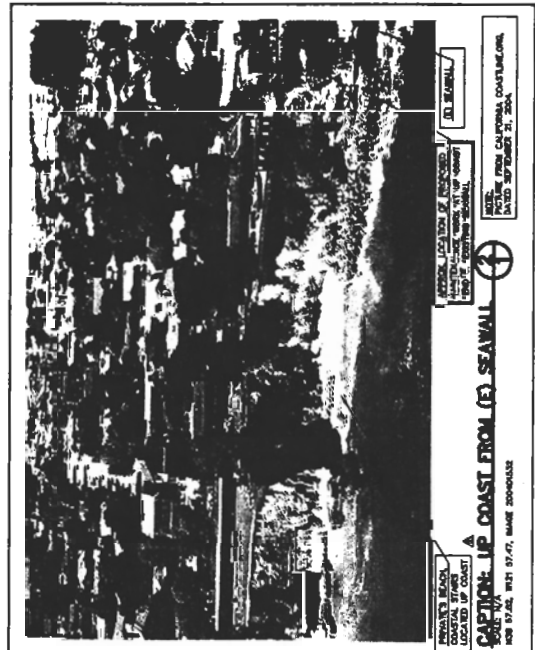
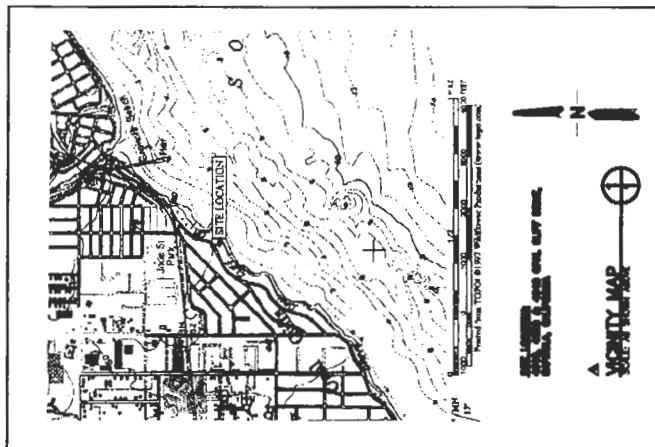
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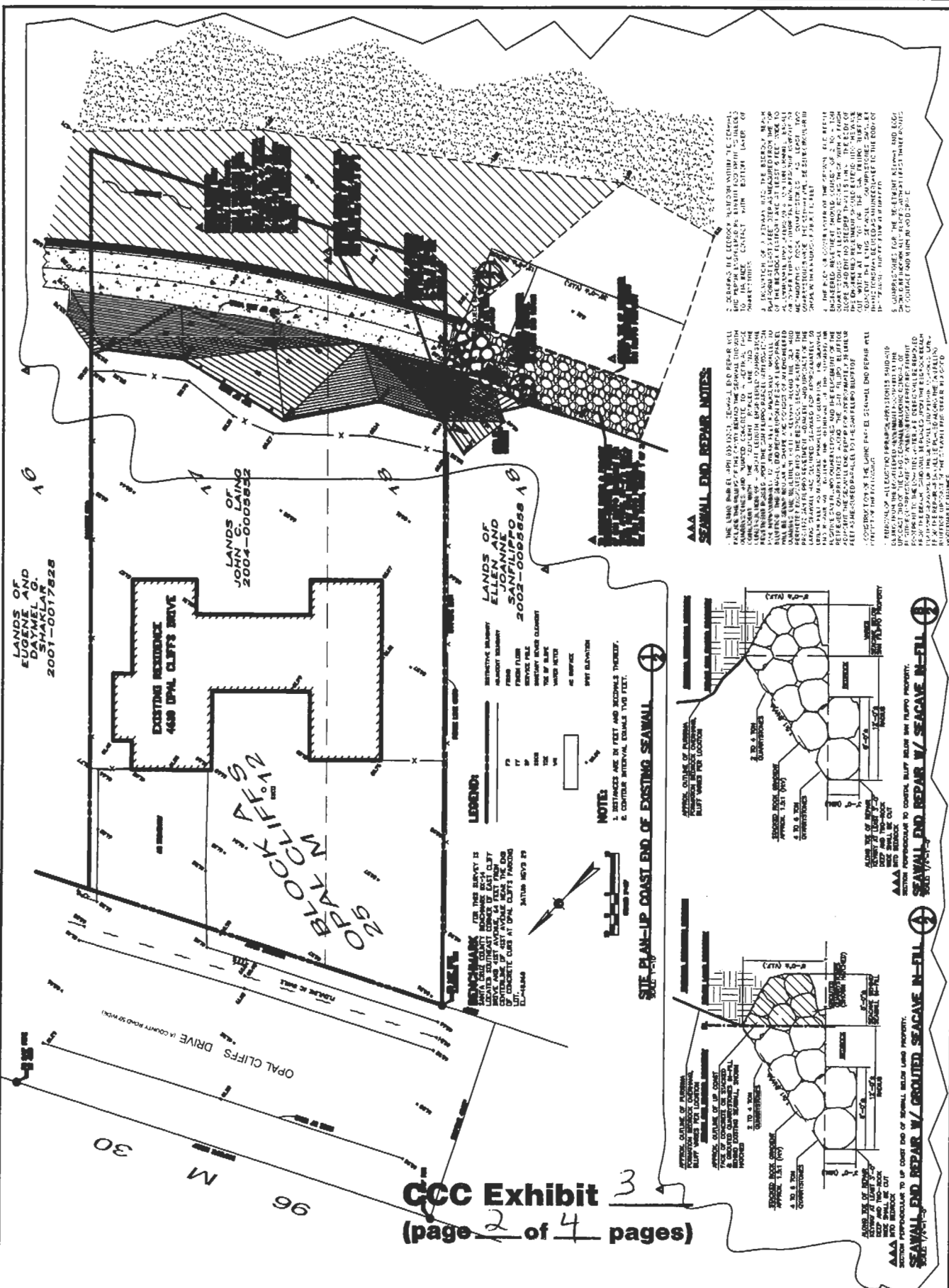
1. COVER SHEET-
2. VICINITY MAP AND COASTLINE PICTURES
3. SEAWALL END REPAIR-
4. SEAWALL TOE REPAIR-
5. PLAN, SECTIONS, DETAILS AND NOTES

APR 1 6 2008

CALIFORNIA  
COASTAL COMMISSION  
CENTRAL COAST AREA



1 OF 3





# SEAWALL REPAIR PLAN SECTIONS DETAILS AND NOTES

SEAWALL REPAIR  
 4610, 4630 & 4640 OPAL CLIFF DRIVE  
 CAPITOLA, SANTA CRUZ CO., CALIFORNIA

NO.	DESCRIPTION	DATE
1	REVISION	10/1/2023
2	REVISION	10/1/2023
3	REVISION	10/1/2023
4	REVISION	10/1/2023
5	REVISION	10/1/2023
6	REVISION	10/1/2023
7	REVISION	10/1/2023
8	REVISION	10/1/2023
9	REVISION	10/1/2023
10	REVISION	10/1/2023

## GENERAL NOTES

1. Details and construction to be in accordance with SDOT C&M and local Ordinances.
2. All dimensions, materials and quantities to be verified and substantiated by field.
3. Check lengths and widths of proposed work.
4. Construction shall be in accordance with U.S.D.C. 11.02.
5. All structural steel, 1/2" min. and 1/4" max. thickness.
6. Reinforcing steel to be in 10, 12, 14, 16, 18, 20, 22, 24, 28, 30, 36, 42, 48, 54, 60, 66, 72, 78, 84, 90, 96, 102, 108, 114, 120, 126, 132, 138, 144, 150, 156, 162, 168, 174, 180, 186, 192, 198, 204, 210, 216, 222, 228, 234, 240, 246, 252, 258, 264, 270, 276, 282, 288, 294, 300, 306, 312, 318, 324, 330, 336, 342, 348, 354, 360, 366, 372, 378, 384, 390, 396, 402, 408, 414, 420, 426, 432, 438, 444, 450, 456, 462, 468, 474, 480, 486, 492, 498, 504, 510, 516, 522, 528, 534, 540, 546, 552, 558, 564, 570, 576, 582, 588, 594, 600, 606, 612, 618, 624, 630, 636, 642, 648, 654, 660, 666, 672, 678, 684, 690, 696, 702, 708, 714, 720, 726, 732, 738, 744, 750, 756, 762, 768, 774, 780, 786, 792, 798, 804, 810, 816, 822, 828, 834, 840, 846, 852, 858, 864, 870, 876, 882, 888, 894, 900, 906, 912, 918, 924, 930, 936, 942, 948, 954, 960, 966, 972, 978, 984, 990, 996, 1002, 1008, 1014, 1020, 1026, 1032, 1038, 1044, 1050, 1056, 1062, 1068, 1074, 1080, 1086, 1092, 1098, 1104, 1110, 1116, 1122, 1128, 1134, 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