

CALIFORNIA COASTAL COMMISSION

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REGULAR CALENDAR
STAFF REPORT AND PRELIMINARY RECOMMENDATION

Application No.: 6-09-18

Applicant: John Sikura

Agent: William de Burgh
 Steven Dalton

Description: Improvements/remodel of an existing 2,426 sq. ft. two-story single-family home with a detached 544 sq. ft. 2 car garage on an 8,344 sq. ft. blufftop lot.

Site: 509 Pacific Avenue, Solana Beach, San Diego County. APN No. 263-041-16

Substantive File Documents: City of Solana Beach General Plan and Zoning Ordinance; Geotechnical Investigation and Bluff Stability Study for 509 Pacific Avenue by Terra Costa Consulting Group, Inc. dated May 9, 2008.

STAFF NOTES:

Summary of Staff's Preliminary Recommendation: Staff is recommending approval, with conditions, of the proposed development. The main issue raised by the proposed development relates to the status of the existing home as a legal nonconforming structure in that the home is located within 12 feet of the edge of the bluff, within the required geologic setback area. As proposed, the applicant will leave most of the exterior walls of the existing home located within 40 ft. of the bluff edge but will construct some minor exterior improvements and significantly rearrange and renovate the interior of the home.

While the proposed improvements are substantial and clearly go beyond normal repair and maintenance, only a small portion of the exterior walls are being demolished and the proposed improvements do not result in a greater risk to the existing nonconforming residential structure over that which currently exists, as only a small area of the exterior walls is being demolished, there is no new living area being added and the footprint of the structure remains the same. Therefore, the proposed improvements to the existing home will not result in the need for shoreline protection any more than the need that currently exists with the present home.

Standard of Review: Chapter 3 policies of the Coastal Act.

I. PRELIMINARY STAFF RECOMMENDATION:

The staff recommends the Commission adopt the following resolution:

MOTION: *I move that the Commission approve Coastal Development Permit No. 6-09-18 pursuant to the staff recommendation.*

STAFF RECOMMENDATION OF APPROVAL:

Staff recommends a **YES** vote. Passage of this motion will result in approval of the permit as conditioned and adoption of the following resolution and findings. The motion passes only by affirmative vote of a majority of the Commissioners present.

RESOLUTION TO APPROVE THE PERMIT:

The Commission hereby approves a coastal development permit for the proposed development and adopts the findings set forth below on grounds that the development as conditioned will be in conformity with the policies of Chapter 3 of the Coastal Act 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.

See attached page.

III. Special Conditions.

The permit is subject to the following conditions:

1. Final Plans. PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicant shall submit to the Executive Director for review and written approval, final site and building plans that have been approved by the City of Solana Beach and that substantially conform with the plans by Stephen Dalton Architect dated April 8, 2009, but shall be revised to include the following:

- a. Any existing permanent irrigation system located on the bluff top site shall be removed or capped and no new permanent irrigation system shall be installed.

- b. All runoff from the home and impervious surfaces on the site shall be collected and directed away from the bluff edge towards the street.
- c. The existing residence and accessory improvements (i.e., decks, patios, walls, etc.) located on the site shall be detailed and drawn to scale on a site plan.

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

2. Assumption of Risk, Waiver of Liability and Indemnity Agreement. By acceptance of this permit, the applicant acknowledges and agrees (i) that the site may be subject to hazards from bluff collapse and erosion; (ii) to assume the risks to the applicant and the property that is the subject of this permit of injury and damage from such hazards in connection with this permitted development; (iii) to unconditionally waive any claim of damage or liability against the Commission, its officers, agents, and employees for injury or damage from such hazards; and (iv) to indemnify and hold harmless the Commission, its officers, agents, and employees with respect to the Commission's approval of the project against any and all liability, claims, demands, damages, costs (including costs and fees incurred in defense of such claims), expenses, and amounts paid in settlement arising from any injury or damage due to such hazards.

3. Future Response to Erosion. If in the future the permittee seeks a coastal development permit to construct additional bluff or shoreline protective devices, the permittee shall include in the permit application information concerning alternatives to the proposed bluff or shoreline protection that will eliminate impacts to scenic visual resources, public access and recreation and shoreline processes. Alternatives shall include but not be limited to: relocation of portions of the principal structures that are threatened, structural underpinning, and other remedial measures capable of protecting the principal structures and providing reasonable use of the property, without constructing additional bluff or shoreline stabilization devices. The information concerning these alternatives must be sufficiently detailed to enable the Coastal Commission or the applicable certified local government to evaluate the feasibility of each alternative, and whether each alternative is capable of protecting existing structures that are in danger from erosion. No shoreline protective devices shall be constructed in order to protect ancillary improvements (patios, decks, fences, landscaping, etc.) located between the principal residential structures and the ocean.

4. Future Development. This permit is only for the development described in coastal development permit No. 6-09-18. Pursuant to Title 14 California Code of Regulations Section 13250(b)(6), the exemptions otherwise provided in Public Resources Code Section 30610(a) shall not apply. Accordingly, any future improvements to the existing single family residence other than those authorized by coastal development

permit No. 6-09-18, including but not limited to repair and maintenance identified as requiring a permit in Public Resources Code section 30610(d) and Title 14 California Code of Regulations section 13252(a)-(b), shall require an amendment to permit No. 6-09-18 from the California Coastal Commission.

5. Deed Restriction. PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicant shall submit to the Executive Director for review and approval, documentation demonstrating that the landowner has executed and recorded a deed restriction, in a form and content acceptable to the Executive Director: (1) indicating that, pursuant to this permit, the California Coastal Commission has authorized development on the subject property, subject to terms and conditions that restrict the use and enjoyment of that property (hereinafter referred to as the “Standard and Special Conditions”); and (2) imposing all Standard and Special Conditions of this permit as covenants, conditions and restrictions on the use and enjoyment of the Property. The deed restriction shall include a legal description of the applicant’s entire parcel or parcels. The deed restriction shall also indicate that, in the event of an extinguishment or termination of the deed restriction for any reason, the terms and conditions of this permit shall continue to restrict the use and enjoyment of the subject property so long as either this permit or the development it authorizes, or any part, modification, or amendment thereof, remains in existence on or with respect to the subject property.

6. Other Permits. PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the permittee shall provide to the Executive Director copies of all other required local discretionary permits from the City of Solana Beach for the development authorized by CDP #6-09-18. The applicant shall inform the Executive Director of any changes to the project required by the City of Solana Beach. Such changes shall not be incorporated into the project until the applicant obtains a Commission amendment to this permit, unless the Executive Director determines that no amendment is legally required.

7. Landscaping. Any proposed landscaping must be drought-tolerant and native or non-invasive plant species. 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 ‘noxious weed’ by the State of California or the U.S. Federal Government shall be utilized within the property.

8. Condition Compliance. WITHIN 60 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 finds and declares as follows:

1. Detailed Project Description/History. The proposed project consists of improvements/remodel of an existing 2,426 sq. ft. two-story single-family home with a detached 544 sq. ft. 2 car garage on an 8,344 sq. ft. blufftop lot. The project site is located at 509 Pacific Avenue, just north of Solana Vista Drive in the City of Solana Beach. Based on the submitted plans, the existing home is located approximately 12 ft. from the bluff edge at its closest point, with all but a small portion of the home (and garage) located within 40 ft. of the bluff edge. There is an existing concrete patio and small 3 ft. high wall along the western portion of the home and a patio, swimming pool and 5 ft. high wall along the eastern portion of the home. The project will not add any new floor area or change the footprint of the existing home. However, pursuant to Section 13250(b)(1) of the Commission's Code of Regulations, because the project involves improvements where both the improvements and the existing home are located within 50 ft. of the edge of the bluff, a coastal development permit is required.

Based on the plans by Stephen Dalton Architect dated 4/8/09 submitted with this application, the following improvements are proposed:

Interior Changes: The interior changes consist of: removal of all wall plaster; the addition of furring at the ceilings; new insulation and drywall; removal and replacement of all flooring; removal and replacement of all electrical, plumbing (includes cutting concrete slab) and mechanical systems (HVAC); removal of bathroom walls, part of entry stair/kitchen walls on first floor and construct new walls and remodel kitchen and convert bathroom to powder room; add new bathroom in downstairs bedroom (no foundation work or new floor area added); and, removal of bathroom/bedroom walls on the second floor and construct new walls and remodel of bathrooms/bedrooms. The existing foundation for the home will not be modified.

Exterior Changes: The exterior changes consist of: removal and replacement of the exterior stucco siding; removal of non-structural pop-out features at the front and rear entries and replacement with new pop-outs with arch feature; removal and replacement of all doors and windows; windows on the ground floor to be replaced with French/Dutch doors within same window width utilizing existing headers (with the exception of two French doors which will increase the width by 1 ft.); windows on upper floor to be replaced with same size windows (except where two smaller windows will be replaced with one larger window and two new windows will increase the width by 1 ft.); add new French doors with a "French balcony" on second floor (no floor area added and no step out provided); and, removal of a portion (approximately 30 lineal ft.) of exterior wall and a door on the north side of the home and replacement with a new wall.

The applicant initially applied for and received an exemption from the Executive Director on June 20, 2008 to replace doors and windows with same size windows and doors,

remodel kitchen and 2 bathrooms, update electrical, plumbing and mechanical systems, replace window trim, add awnings to windows and add stone veneer to base of exterior walls (ref. 6-08-61-X). Then, on September 3, 2008, the applicant applied for another exemption to replace two existing windows on the first floor and add French doors and a guardrail outside a second floor window. However, it was determined that this project was not exempt due to the fact that the project now included modification to the exterior walls and the exemption was denied by the Executive Director on October 28, 2008. On January 20, 2009, the applicant was issued an exemption to replace the roof to address ponding, with no change to the height of the parapet (ref. 6-09-003-X).

Subsequently, the City of Solana Beach discovered that the work being performed appeared to go beyond the approved building permit and coastal exemption and as such issued a stop work order on January 29, 2009. At the City's request, Commission staff accompanied the City on a site inspection of the property on March 11, 2009 and along with the City detailed the various improvements that had been completed or were under way that were not included in the previous exemptions. Based on that site inspection, it was determined that the previous exemption No. 6-08-61-X was no longer valid as the project now included removal and replacement of exterior walls and the applicant was instructed to submit an application for a coastal development permit. The subject coastal development permit application was then submitted on April 8, 2009.

The City of Solana Beach does not yet have a certified Local Coastal Program (LCP) and, therefore, Chapter 3 of the Coastal Act is the standard of review.

2. Improvements to Blufftop Structures. Coastal Act sections 30240(b) and 30253 are applicable to the proposed development and state, in part:

30240(b)

Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade those areas, and shall be compatible with the continuance of those habitat and recreation areas.

Section 30253

New development shall do all of the following:

(a) Minimize risks to life and property in areas of high geologic, flood, and fire hazard.

(b) Assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs.

[. . .]

A. Blufftop Stability.

Both the above cited sections are applicable to the Commission's review of new blufftop development and improvements to existing blufftop development such as that proposed. The policies are designed to assure that development in such hazardous locations and adjacent to parks and recreation areas, such as the public beach, are sited and designed to reduce risks and to prevent impacts which would significantly degrade those areas. In review of blufftop development in nonconforming locations, i.e. with insufficient geologic setbacks, the Commission must assure any development which is approved will not contribute to the destruction of the site or the surrounding area, in this case the adjacent public parkland comprised of the bluffs and beach. Approved development must also be designed to prevent impacts to those areas. One means to assure such protection of public beach recreational areas is to assure, to the extent possible, that improvements or new development will not require protective devices that substantially alter the natural landforms along bluffs and adversely impact visual quality, coastal processes and public access along the shoreline.

The site of the proposed development is on top of an approximately 82 ft. high coastal bluff in the City of Solana Beach. Because of the natural process of continual bluff retreat, coastal bluffs in this area and at the subject site are considered a hazard area. Because of erosion below the subject property, an approximately 150 ft. long, 27 ft.-high seawall was constructed at the toe of the bluff prior to the implementation of the Coastal Act. Although no plans of the wall's construction are available, it is believed to consist of stacked bags of concrete that have a width of two to three bags, reinforced with rebar driven vertically through the bags at set intervals. Therefore, the seawall is not comparable in design and is not expected to perform as well as currently designed walls. In fact, in 1998, the Commission approved repairs to the seawall which had been damaged by ongoing erosion caused by wave action resulting from the El Nino storms of 1997-98. During the El Nino storms of 1997-98, the beach level in this pocket beach had declined such that the foundation of the wall was exposed and storm waves siphoned bluff material from under the seawall creating an approximately 3 foot-wide, 20 foot-deep sinkhole behind a northern section of the wall (ref. CDP #6-98-148/City of Solana Beach). Therefore, the existing seawall probably does not provide the same level of protection as present day designed seawalls and its presence highlights the hazardous nature of this specific site in terms of ongoing threats from bluff erosion to development at the top of the bluff.

A number of significant bluff failures have occurred along this stretch of coastline including several slides on the bluffs just north and south of the subject site. In addition, documentation has been presented in past Commission actions concerning the unstable nature of the bluffs in this area of the coast (ref. CDP Nos. 6-87-391/Childs; 6-92-82/Victor, 6-92-212/Wood, 6-93-181/Steinberg, 6-97-165/Wood, Lucker; 6-98-148/City of Solana Beach; 6-99-91/Becker; 6-99-95/City of Solana Beach, 6-99-100/Presnell,

et.al). In addition, projections of sea level rise continue to be updated with the latest reports estimating a significant rise in sea level over the next 100 years. Clearly, the potential exists for significant bluff retreat in this area.

In response to slope stability problems found in Solana Beach and Encinitas, in the past, the Commission typically required that all new development observe a minimum setback of 40 feet from the top of the bluff, with a reduction to 25 feet allowed subject to the finding of a certified engineering geologist that bluff retreat will not occur to the extent that the principal permitted structure would be endangered within its economic life (75 years). When the County of San Diego had jurisdiction over the area, the County adopted the Coastal Development Area regulations as part of its LCP Implementing Ordinances, which had similar requirements. The City of Solana Beach has also utilized a 40 foot setback which may be reduced to 25 feet following a discretionary review process which finds that the construction will not be subject to foundation failure during the economic life of the structure. However, due to the number of slope collapses in the area and, in the case of Solana Beach, the recent discovery of a mid-bluff layer of clean sands within the bluffs, the Commission now typically requires that a minimum 40-foot setback development be maintained in Solana Beach. In addition, the Commission has required a geologist's certification that bluff retreat will not occur to the extent that a seawall or other shoreline protective devices would be required to protect the new development within the economic life of the structure. This has actually resulted in the necessary setback to assure structural stability to be far greater than 40 ft. in some cases in Solana Beach and Encinitas.

In the case of the subject residence, the existing home is sited as close as 12 ft. from the bluff edge. The applicant has submitted a geotechnical report for a proposed residential addition to the subject home currently being reviewed by the City of Solana Beach (and not part of this application) that includes a site-specific quantitative slope stability analysis. The slope stability analysis measures the likelihood of a landslide at the subject site. According to the applicant's geotechnical report of May 2008, a minimum factor of safety of 1.5 (the industry standard) against a landslide occurring at the subject site is located at approximately 40 ft. landward from the bluff edge along the north portion of the site and at approximately 37 ft. landward of the edge of the bluff along the south portion of the site. (The factor of safety is an indicator of slope stability where a value of 1.5 is the industry-standard value for new development. In theory, failure should occur when the factor of safety drops to 1.0, and no slope should have a factor of safety less than 1.0.) As the majority of the existing home is located within 40 ft. of the bluff edge, this implies that the existing home is currently threatened and the geotechnical report did not even take into consideration the long-term erosion at the site.

From the preceding discussion, it would appear that the existing home is currently threatened and as such, it raises the issue of how the proposed improvements can be found consistent with section 30253 of the Coastal Act in that they consist of new blufftop development that appears to require shoreline protection. In addition, although an existing seawall is located at the base of bluff below the subject site, the design of the seawall has not been demonstrated to have been constructed in a manner that will provide

permanent protection to the proposed development. To address these concerns, the Commission must look at the site specific circumstances to determine whether or not the proposed improvements themselves will significantly contribute to the need for existing or future shoreline protection at the subject site.

B. Retention of Nonconforming Structures.

The existing single-family home is non-conforming with respect to the City of Solana Beach Zoning Ordinance regarding setback requirements for blufftop developments. While this zoning ordinance is not the standard of review for this project, it can provide guidance on how non-conforming structures are analyzed and addressed within Solana Beach. Section 17.72.120 of the City's Municipal Code defines a nonconforming structure as a building, structure or improvement that:

1. Does not conform to the development standards described in this title, together with all building standards including, without limitation, height, setbacks, density, parking, type of building, or coverage of lot by structure; and
2. Did comply with the development standards contained in this title in effect at the time the building, structure or improvement was constructed or structurally altered and was lawfully constructed.

The existing residence is located as close as 12 feet from the edge of an approximately 82 ft. high coastal bluff. The City's municipal code requires that blufftop structures be setback at a minimum of 40 feet landward of the bluff edge unless an engineering geology report is prepared that certifies a setback of less than 40 feet (but not less than 25 feet) is adequate to assure the residence will be safe from erosion over an estimated 70 years. The applicant's geotechnical report documents that most of the existing structure, located within 40 feet of the bluff edge, has less than a 1.5 factor of safety and thus, may be threatened over its remaining lifetime. Additionally, by City standards, the existing structure is nonconforming in that it does not maintain a 40 ft. setback from the edge of the bluff.

While the proposed development does not add any square footage or change the footprint of the existing home, the portions of the home within the 40 ft. geologic setback will be substantially altered with exterior improvements and interior demolition and redesign. Although most of the existing exterior walls located within 40 feet of the bluff edge will remain, none of the interior area will be unaffected by the interior demolition, redesign and improvements.

Section 30253 of the Coastal Act requires that new development be setback to a safe location so as not to require shoreline protection in the future which would result in adverse effects to the natural bluff and beach. The goal of Section 30253 is to avoid construction of upper and lower bluff stabilization devices that alter natural landforms and coastal processes. The question raised by this proposal is how much the existing nonconforming structure can be revised or improved without increasing the geologic risk.

In this case, the City's current zoning ordinances relating to nonconforming structures provide some guidance in interpreting when that threshold has been exceeded

The City's nonconforming structure regulations at Section 17.16.040 of the City's Municipal Code identify the type of work that can be done without triggering a requirement to bring a nonconforming structure into conformance with current standards. The regulations indicate "[r]outine internal and external maintenance and repairs may be performed on a nonconforming structure." In addition, Section 17.16.110E states:

Replacement, repair or reinforcement of existing structural components within the existing building envelope of principal residential structures and related accessory structures is allowed as necessary to repair damage from fire, earthquake, flood, weather, sunlight, mold, mildew, termites, accidental or natural causes. Further, reinforcement, augmentation or strengthening of existing structural components within the existing building envelope of these structures when necessary to support fire safety or building safety code improvements shall be allowed.

Additionally, Section 17.16.060 of the City's Municipal Code allows additions to occur to nonconforming structures as long as the addition does not "increase the size or degree of the existing nonconformity." The purpose of these regulations is to limit the type and extent of work that can be performed on nonconforming structures. And as Section 17.16.060 specifically identifies, "[t]his section shall not be interpreted to allow the reconstruction of a nonconforming structure". Thus, using these guidelines, the issue is whether the proposed project constitutes "routine internal and external repairs" which do not "increase the size or degree of the existing nonconformity" and whether or not the proposed development represents the "reconstruction of a nonconforming structure". In the context of proposals to enlarge and reconstruct existing non-conforming structures, the Commission has in some cases required these structures to be brought into conformity with the shoreline hazard policies of the Coastal Act or certified LCPs (ref. CDP #A-6-LJS-99-160/Summit Resources).

As stated, one of the goals of the Coastal Act is to protect natural bluffs and beaches. New development or reconstruction of a nonconforming structure which has inadequate setbacks to protect it from erosion over its lifetime, will likely result in demands for shoreline protection which can result in adverse impacts to the bluffs and beach. In light of this goal, the Commission finds that the term "repair" is intended to mean minor activities that allow a nonconforming structure to be kept in habitable condition. This term does not include demolition, expansion, construction of additions, and such other work that results in reconstruction of the nonconforming structure. To interpret this term otherwise would allow new development that would conflict with the goals of the Coastal Act.

In the case of the proposed development, the Commission finds that the proposed project results in improvements to a non-conforming structure, allowing the structure to remain in a non-conforming location for a longer period of time. In addition, the Commission finds the proposed interior and exterior improvements and renovation to be more than

routine repair and maintenance, but also not full reconstruction of the residence. Thus, the remaining question is whether the project increases the degree of nonconformity and/or results in an additional threat to the residential structure.

C. Does the Project Increase the Degree of Nonconformity.

The purpose of any nonconforming structure regulations is to allow continued use of existing legal nonconforming structures which were legally constructed but have become nonconforming due to changes beyond the property owner's control, provided the degree of nonconformity is not increased or expanded. These types of regulations are not intended to allow redevelopment of a property solely in reliance on the nonconforming regulations without regard to other requirements for discretionary permits, community land use policies and current zoning requirements. The Commission has found that increasing the size of a nonconforming structure with an inadequate geologic setback increases the degree of nonconformity and extends the time period that the nonconformity will exist, thereby increasing the risk to the structure.

As previously described, the proposed project to renovate and improve the existing home is not a repair or an addition to a nonconforming single-family residence. The question is whether or not the proposed improvements are so substantial that the project essentially consists of rebuilding the home in its existing non-conforming location, thus resulting in an increase in the degree of non-conformity. However, neither the Coastal Act, nor the City's Municipal Code provide a means to make this determination. What has been done in some coastal jurisdictions is to determine if more than 50% of the exterior walls are being demolished. If more than 50% of the exterior walls are being demolished, then the project is not a remodel and is considered new development. Some other local governments have adopted a method based on a ratio of the cost of the proposed improvements to the value of the existing home. If, based on this valuation method, the proposed improvements exceed 50% of the value of the home, then the project is no longer considered a remodel and instead is considered new development and must therefore meet all current code requirements relative to setbacks, height, etc. However, the City of Solana Beach does not have either of these provisions in its municipal code and as such, this analysis was not provided.

In this particular case, while the proposed improvements are substantial and clearly go beyond normal repair and maintenance, only a small portion of the exterior walls are being demolished, and the Commission finds that the proposed improvements do not result in a greater risk to the existing nonconforming residential structure over that which currently exists, as only a small area of the exterior walls is being demolished, there is no new living area being added, no foundation work is proposed and the footprint of the structure will remain the same. Therefore, the proposed improvements to the existing home will not result in the need for shoreline protection any more than the need that currently exists.

The existing home is in a hazardous location, however, and the proposed development will likely increase the amount of time that the structure will remain in its hazardous

location. The Commission must therefore ensure that any approved development is conditioned to at least reduce this existing risk. Special Condition #1 has been attached which requires the applicants to submit final plans for the project that demonstrate that all runoff on the top of the bluff is collected and directed away from the bluff and that all permanent irrigation on the blufftop be removed or capped. In review of any development in a blufftop location, the Commission has required implementation of such measures to reduce risk and assure that overall site conditions which could adversely impact the stability of the bluff have been addressed.

Also, due to the inherent risk of developing on an eroding blufftop, as documented by the applicants' geotechnical report, Special Condition #2 requires the applicant to waive any claim of liability against the Commission and to indemnify the Commission against damages that might result from the proposed development. Given that the applicant has chosen to construct the proposed project despite these risks, the applicant must assume the risks. Only as conditioned can the proposed project be found consistent with Sections 30235, 30240 and 30253 of the Coastal Act.

The subject site is subject to erosion which may, over time, threaten the existing structure and may result in a request for shoreline protection which would have an adverse impact on the surrounding natural bluffs and the adjacent beach. Special Condition #3 has been attached which requires the applicant to acknowledge that alternative measures which do not result in additional impacts to the adjacent public property must be analyzed and implemented, if feasible, on the applicant's blufftop property should the need for further stabilization of the residence occur. With this condition (and recordation of the permit conditions as a deed restriction as required pursuant to Special Condition #5), current and future property owners are put on notice that the site is in a hazardous location and measures on the subject property which would reduce risk to the principal residential structure should be considered, to provide stability and avoid further impacts to the adjacent public parkland.

Special Condition #4 has been attached which requires that an amendment be approved for any future additions to the residence or other development as defined by the Coastal Act on the subject site. Requiring an amendment for all future development allows the Commission to insure that such development will not create or lead to the instability of the coastal bluffs, impacts to public access, adverse visual impacts or result in the construction or enlargement of the existing structure in a high risk area. Special Condition #5 requires the applicant to record a deed restriction imposing the conditions of this permit as covenants, conditions and restrictions on the use and enjoyment of the property.

Because erosion and landslides are caused by a variety of factors including over-watering on the blufftop and inappropriate drainage, Special Condition #1a prohibits the applicant from having permanent irrigation devices on top of the bluff. In addition, landscaping that is not drought-tolerant may require irrigation that could contribute to erosion of the blufftop. Special Condition #7 has been attached to address this risk by requiring any

future landscaping on the site be limited to drought-resistant, native or non-invasive species, which will help serve to reduce the need for irrigation.

In summary, based on the geotechnical report/slope stability analysis submitted by the applicant, most of the existing home is located seaward of the 40 ft. setback line and does not achieve a minimum 1.5 factor of safety and thus, is non-conforming. While the Commission is concerned that remodeling and improvements to existing nonconforming blufftop structures not result in an increase of the nonconformity in a way that would heighten the risk or require new or additional shoreline protection in the future, such is not the case here. Although much of the existing structure is in a location where the Commission could not now authorize new development due to the threat from shoreline erosion and bluff failure, the proposed development represents improvements to a non-conforming blufftop structure, without increasing the degree of non-conformity or resulting in an additional or increased threat to the existing home. The proposed development, therefore, does not warrant requiring the entire existing structure to be brought into conformance with the blufftop setback requirements for new development. Therefore, the Commission finds the subject development, as conditioned, consistent with Section 30240 and 30253 of the Coastal Act.

3. Visual Resources. Sections 30251, 30240, and 30250 of the Coastal Act require that the scenic and visual qualities of coastal areas be protected, that new development adjacent to park and recreation areas be sited so as to not degrade or impact the areas and that new development not significantly adversely affect coastal resources. These sections specifically provide:

Section 30251

The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas.

Section 30240

[. . .]

(b) Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade those areas, and shall be compatible with the continuance of those habitat and recreation areas.

Section 30250

(a) New residential, commercial, or industrial development, except as otherwise provided in this division, shall be located within, contiguous with, or in close proximity to, existing developed areas able to accommodate it or, where such areas are not able to accommodate it, in other areas with adequate public services and where it will not have significant adverse effects, either individually or cumulatively, on coastal resources.

The subject development involves improvements to an existing two-story blufftop residence. The development site is located in a residential neighborhood consisting of single-family homes of similar bulk and scale to the proposed development. The proposed development does not include any change to the footprint or height of the existing residence. Although the existing home is visible from the beach below, the proposed development will improve the exterior appearance of the home, but not enlarge it in any way and as such, no public views will be blocked. In addition, views across the site to the shoreline are not currently available. Therefore, it is not anticipated that the proposed development will have any adverse effect on scenic or visual resources and the project may be found consistent with Section 30251 of the Coastal Act.

4. Runoff/Water Quality. Section 30231 of the Coastal Act requires that the biological productivity of coastal waters be maintained by, among other means, controlling runoff. Specifically, it reads:

The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges and entrapment, controlling runoff,

The proposed development will be located at the top of the bluffs overlooking the Pacific Ocean. As such, drainage and run-off from the development could potentially affect water quality of coastal waters as well as adversely affect the stability of the bluffs. To reduce the risk associated with unattended running or broken irrigation systems, Special Condition #1a restricts the property owner from installing permanent irrigation devices and requires the removal or capping of any existing permanent irrigation systems. In addition, in order to protect coastal waters from the adverse effects of polluted runoff, the Commission has typically required that all runoff from impervious surfaces be directed through landscaping as a filter mechanism prior to its discharge into the street. In this case, however, directing runoff into blufftop landscape areas could have an adverse effect on bluff stability by increasing the amount of ground water within the bluff material that can lead to bluff failures. Therefore, in this case, reducing the potential for water to be retained on the site will be more protective of coastal resources. The restriction on irrigation will minimize the amount of polluted runoff from the property to the extent

feasible. Therefore, the Commission finds the proposed project consistent with Sections 30231 of the Coastal Act.

5. Public Access. Section 30212 of the Coastal Act requires, in part:

- (a) Public access from the nearest public roadway to the shoreline and along the coast shall be provided in new development projects except where:
 - (1) it is inconsistent with public safety, military security needs, or the protection of fragile coastal resources,
 - (2) adequate access exists nearby, or, . . .

The subject site is located between the Pacific Ocean and the first public roadway, which in this case is Pacific Avenue. The project site is located within a developed single-family residential neighborhood on an approximately 82 ft.-high coastal blufftop lot. Vertical access through the site is not necessary nor warranted, given the fragile nature of the bluffs. Adequate public vertical access is provided three lots south of the subject site at Tide Beach Park. Therefore, the proposed project, as conditioned, will have no impact on public access, consistent with the public access policies of the Coastal Act.

6. Unpermitted Development. Unpermitted development has been carried out on the subject site without the required coastal development permit. The applicant is requesting after-the-fact approval for some of the improvements to an existing single-family residence. To ensure that the matter of unpermitted development is resolved in a timely manner, Special Condition #8 requires that the applicant satisfy all conditions of this permit, which are prerequisite to the issuance of this permit, within 60 days of Commission action, or within such additional time as the Executive Director may grant for good cause.

Although improvements to the existing residence have taken place prior to submission of this permit application, consideration of this application by the Commission has been based solely upon the Chapter 3 policies of the Coastal Act. Review of this permit does not constitute a waiver of any legal action with regard to the alleged violation nor does it constitute an admission as to the legality of any development undertaken on the subject site without a coastal permit.

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

The subject site was previously in the County of San Diego's jurisdiction, but is now within the boundaries of the City of Solana Beach. The City has recently submitted a Land Use Plan for Commission review which is expected to be heard by the Commission sometime in 2009. The draft LUP initially contained some innovative components, including a proposal to develop a plan to remove seawalls over time and retreat the line of structures and/or acquire blufftop properties. However, such a comprehensive program must include a combination of measures that address proper design and siting of new development and additions to existing development to avoid both perpetuation of lower seawalls and total armoring of the bluff. A combination of anticipated lower bluff stabilization along with measures to reduce the size of blufftop structures and move the line of development inland, could avoid the need for mid- and upper bluff stabilization in some cases.

In the case of the subject development, the proposed improvements to the existing residential structure, as conditioned, have been found to be consistent with the Chapter 3 policies of the Coastal Act in that the proposed development will not result in reconstruction of an existing structure within the geologic setback area such that, as a result of the proposed improvements, new or additional bluff and/or shoreline protection would be necessary in the future. It is expected that the City's LCP will include ordinances to address these issues associated with improvements to existing nonconforming structures in order to meet the requirements of the Coastal Act.

The location of the proposed residential development is designated for residential uses in the City of Solana Beach Zoning Ordinance and General Plan, and was also designated for residential uses under the County LCP. As conditioned, the subject development is consistent with these requirements. Based on the above findings, the proposed development is consistent with the Chapter 3 policies of the Coastal Act. Therefore, the Commission finds that approval of the proposed development, as conditioned, will not prejudice the ability of the City of Solana Beach to complete a certifiable local coastal program. However, these issues of shoreline planning will need to be addressed in a comprehensive manner in the future through the City's LCP certification process

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

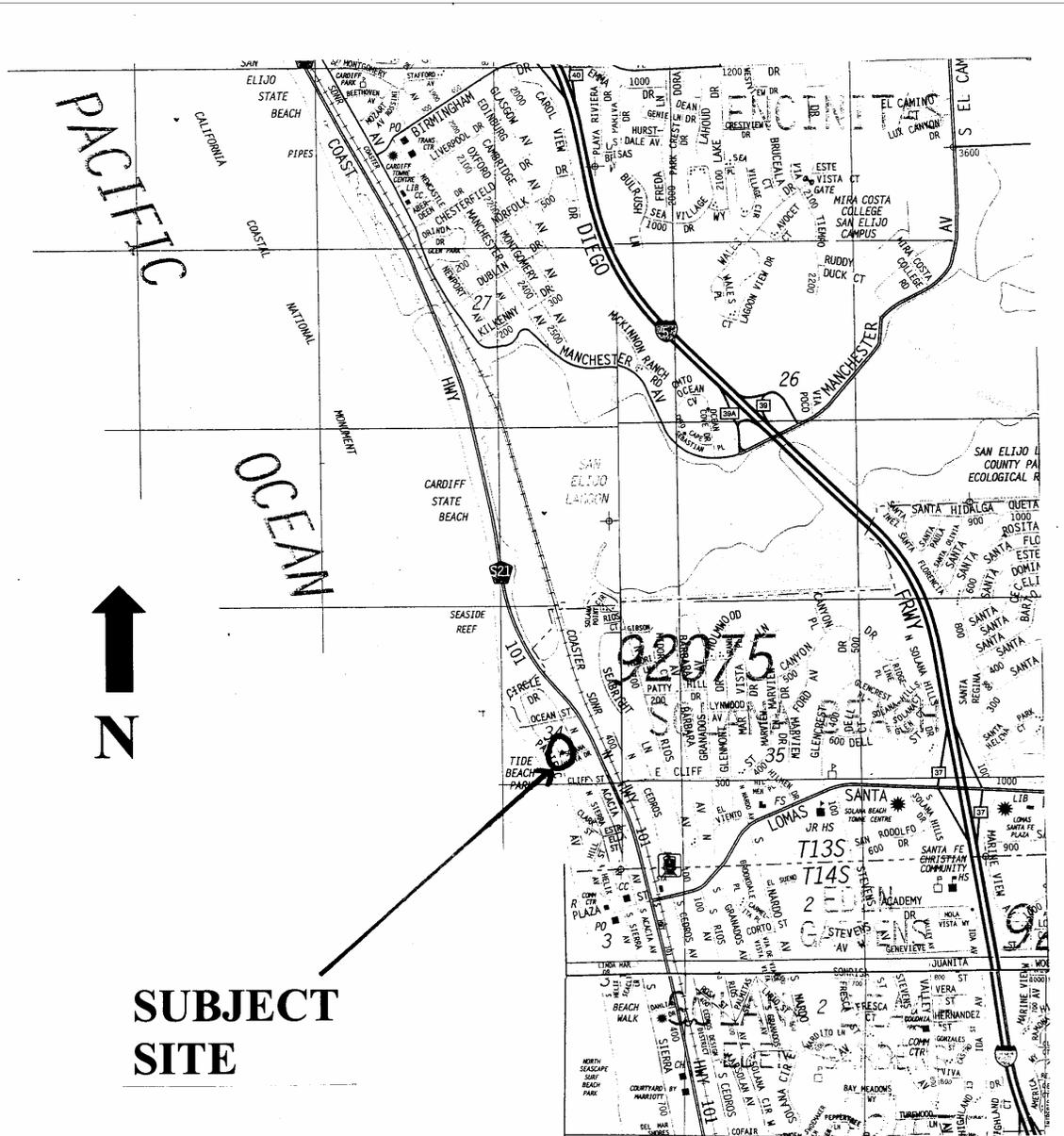
Section 13096 of the Commission's Code of Regulations requires Commission approval of Coastal Development Permits to be supported by a finding showing the permit, as conditioned, to be consistent with any applicable requirements of the California Environmental Quality Act (CEQA). Section 21080.5(d)(2)(A)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

The proposed project has been conditioned in order to be found consistent with the Chapter 3 policies of the Coastal Act. Mitigation measures, including conditions addressing assumption of risk, future development and submittal of final project plans will minimize all adverse environmental impacts. As conditioned, there are no feasible alternatives or feasible mitigation measures available which would substantially lessen

any significant adverse impact which the activity may have on the environment. Therefore, the Commission finds that the proposed project is the least environmentally-damaging feasible alternative and is consistent with the requirements of the Coastal Act to conform to CEQA.

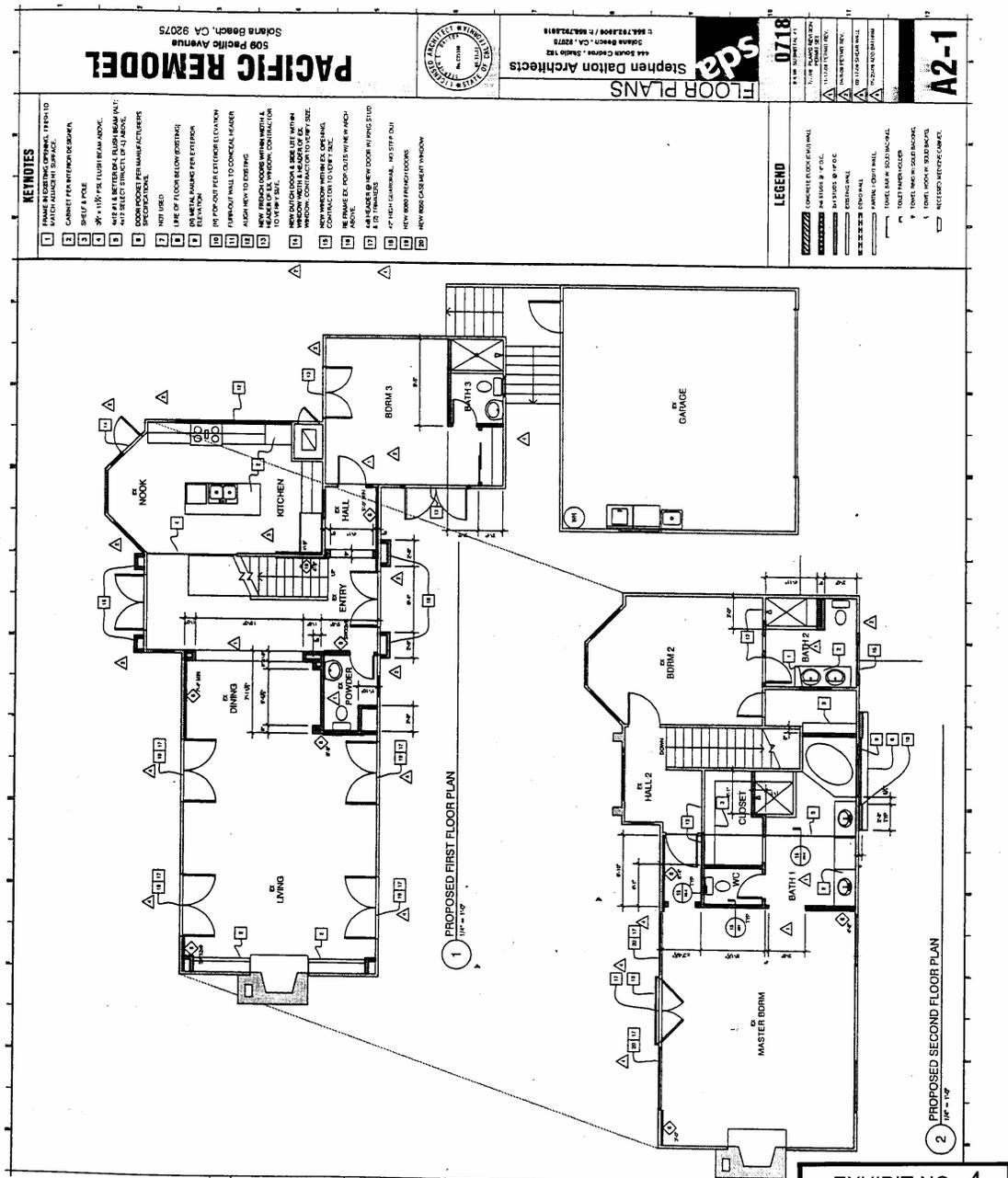
STANDARD CONDITIONS:

1. Notice of Receipt and Acknowledgment. The permit is not valid and development shall not commence until a copy of the permit, signed by the permittee or authorized agent, acknowledging receipt of the permit and acceptance of the terms and conditions, is returned to the Commission office.
2. Expiration. If development has not commenced, the permit will expire two years from the date on which the Commission voted on the application. Development shall be pursued in a diligent manner and completed in a reasonable period of time. Application for extension of the permit must be made prior to the expiration date.
3. Interpretation. Any questions of intent or interpretation of any condition will be resolved by the Executive Director or the Commission.
4. Assignment. The permit may be assigned to any qualified person, provided assignee files with the Commission an affidavit accepting all terms and conditions of the permit.
5. Terms and Conditions Run with the Land. These terms and conditions shall be perpetual, and it is the intention of the Commission and the permittee to bind all future owners and possessors of the subject property to the terms and conditions.



**SUBJECT
SITE**

EXHIBIT NO. 1
APPLICATION NO.
6-09-18
Location Map
 California Coastal Commission



PACIFIC REMODEL
509 Pacific Avenue
Solana Beach, CA 92075

KEYNOTES

- 1 FRAME IN EXISTING OPENING, FINISH TO MATCH ADJACENT SURFACE.
- 2 CABINET PER INTERIOR DESIGNER.
- 3 SHELF & POLE.
- 4 3/4" x 1 1/8" x 1/2" FLUSH BEAM ANGLE.
- 5 4" x 4" x 1/2" FLUSH BEAM ANGLE.
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FLOOR PLANS
Stephen Dalton Architects
444 Soles Canyon, Suite 103
Solana Beach, CA 92075
P: 949.438.0000 / F: 949.438.0018

0718

LEGEND

- 1 EXISTING WINDOW
- 2 EXISTING DOOR
- 3 EXISTING WALL
- 4 EXISTING FLOOR
- 5 EXISTING CEILING
- 6 EXISTING ROOF
- 7 EXISTING STAIR
- 8 EXISTING ELEVATOR
- 9 EXISTING MECHANICAL
- 10 EXISTING ELECTRICAL
- 11 EXISTING PLUMBING
- 12 EXISTING GAS
- 13 EXISTING TELEPHONE
- 14 EXISTING CABLE
- 15 EXISTING ANTENNA
- 16 EXISTING SIGN
- 17 EXISTING LIGHTING
- 18 EXISTING FURNITURE
- 19 EXISTING APPLIANCE
- 20 EXISTING FIXTURE
- 21 EXISTING ACCESSORY
- 22 EXISTING FINISH
- 23 EXISTING MATERIAL
- 24 EXISTING COLOR
- 25 EXISTING TEXTURE
- 26 EXISTING GRAIN
- 27 EXISTING PATTERN
- 28 EXISTING SCALE
- 29 EXISTING WEIGHT
- 30 EXISTING STRENGTH
- 31 EXISTING DURABILITY
- 32 EXISTING SAFETY
- 33 EXISTING SECURITY
- 34 EXISTING COMPLIANCE
- 35 EXISTING REGULATION
- 36 EXISTING STANDARD
- 37 EXISTING SPECIFICATION
- 38 EXISTING REQUIREMENT
- 39 EXISTING CONDITION
- 40 EXISTING STATE
- 41 EXISTING POSITION
- 42 EXISTING ORIENTATION
- 43 EXISTING ALIGNMENT
- 44 EXISTING ADJUSTMENT
- 45 EXISTING CALIBRATION
- 46 EXISTING TUNING
- 47 EXISTING BIAS
- 48 EXISTING OFFSET
- 49 EXISTING DRIFT
- 50 EXISTING ERROR
- 51 EXISTING UNCERTAINTY
- 52 EXISTING VARIATION
- 53 EXISTING FLUCTUATION
- 54 EXISTING NOISE
- 55 EXISTING VIBRATION
- 56 EXISTING SHOCK
- 57 EXISTING IMPACT
- 58 EXISTING COLLISION
- 59 EXISTING CONTACT
- 60 EXISTING FRICTION
- 61 EXISTING RESISTANCE
- 62 EXISTING STIFFNESS
- 63 EXISTING DUCTILITY
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- 65 EXISTING COMPRESSIVE
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- 71 EXISTING TRANSLATION
- 72 EXISTING OSCILLATION
- 73 EXISTING RESONANCE
- 74 EXISTING DAMPING
- 75 EXISTING STABILITY
- 76 EXISTING BALANCE
- 77 EXISTING ALIGNMENT
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- 80 EXISTING PAVING
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- 82 EXISTING SLOPING
- 83 EXISTING DRAINAGE
- 84 EXISTING IRRIGATION
- 85 EXISTING LANDSCAPING
- 86 EXISTING HEDGING
- 87 EXISTING FENCING
- 88 EXISTING GARDENING
- 89 EXISTING TREELANDSCAPING
- 90 EXISTING WOODLANDSCAPING
- 91 EXISTING WATERLANDSCAPING
- 92 EXISTING SNOWLANDSCAPING
- 93 EXISTING ROCKLANDSCAPING
- 94 EXISTING SANDLANDSCAPING
- 95 EXISTING SILTLANDSCAPING
- 96 EXISTING CLAYLANDSCAPING
- 97 EXISTING GESSANDLANDSCAPING
- 98 EXISTING GESSILTLANDSCAPING
- 99 EXISTING GESSANDSILTLANDSCAPING
- 100 EXISTING GESSANDSILTCLAYLANDSCAPING

A2-1

EXHIBIT NO. 4
APPLICATION NO.
6-09-18
Proposed Floor Plans
California Coastal Commission

2 PROPOSED SOUTH ELEVATION
1/8" = 1'-0"

3 PROPOSED WEST ELEVATION
1/8" = 1'-0"

1 PROPOSED EAST ELEVATION
1/8" = 1'-0"

EXT FINISH SCHEDULE	
1	EXTERIOR WALLS
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PACIFIC REMODEL
509 Pacific Avenue
Solana Beach, CA 92075

EXTERIOR ELEVATIONS
Stephen Dalton Architects
444 South Coastway, Suite 103
Solana Beach, CA 92083
949.782.1000 / 949.782.8115

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EXHIBIT NO. 5
APPLICATION NO.
6-09-18
Elevations