

CALIFORNIA COASTAL COMMISSION

SAN DIEGO AREA
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W15c

Filed: 2/8/10
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Staff: Melissa Ahrens-SD
Staff Report: 3/24/10
Hearing Date: 4/14-16/10

REGULAR CALENDAR
STAFF REPORT AND PRELIMINARY RECOMMENDATION

Application No.: 6-10-008

Applicant: Bill and Karen Kohn

Agent: Mark Mitchell

Description: Remodel of existing two story 1,814 sq. ft. three-unit residential structure with attached carport, including interior and exterior changes to both floors as well as a 477 sq. ft. third floor addition, resulting in a 30 ft. high, 1,904 square foot, three story single family residence with attached carport and 1 car garage.

| | |
|--------------------|---------------------|
| Lot Area | 1,551 sq. ft. |
| Building Coverage | 1,001 sq. ft. (64%) |
| Pavement Coverage | 350 sq. ft. (23%) |
| Landscape Coverage | 200sq. ft. (13%) |
| Parking Spaces | 1 |
| Zoning | R-N |
| Plan Designation | Mission Beach |
| Project Density | 36 dua |
| Ht abv fin grade | 30 feet |

Site: 701 Yarmouth Court, Mission Beach, San Diego, San Diego County.
APN 423-316-01.

Substantive File Documents: Certified Mission Beach Precise Plan; Certified Mission Beach Planned District Ordinance; City of San Diego Land Development Code

STAFF NOTES:

Summary of Staff's Preliminary Recommendation:

Staff is recommending approval of the proposed project, subject to special conditions. The primary issues raised by the proposed development relate to protection of public views along the shoreline and existing non-conforming walls that encroach into the

designated set back areas along the public accessway of Ocean Front Walk and Yarmouth Court. To address protection of public ocean view corridors, a special condition is proposed that requires landscape plans to limit any landscaping and hardscaping within the designated view corridors on the subject site to a maximum height of three feet. To address the existing legal non-conforming structure built on the zero-lot line adjacent to Ocean Front Walk, staff recommends that a special condition be added to notify the applicant that if the subject structure is substantially altered such that 50% or more of the existing structure is modified, demolished, removed or replaced, the structure will not retain its non-conforming rights and any encroachments into the designated set backs along Ocean Front Walk and Yarmouth Court shall be removed in their entirety.

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. 6-10-008 pursuant to the staff recommendation.*

STAFF RECOMMENDATION OF APPROVAL:

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

RESOLUTION TO APPROVE THE PERMIT:

The Commission hereby approves a coastal development permit for the proposed development and adopts the findings set forth below on grounds that the development as conditioned will be in conformity with the policies of Chapter 3 of the Coastal Act. Approval of the permit complies with the California Environmental Quality Act because either 1) feasible mitigation measures and/or alternatives have been incorporated to substantially lessen any significant adverse effects of the development on the environment, or 2) there are no further feasible mitigation measures or alternatives that would substantially lessen any 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 Landscape/Yard Area Fence Plans. PRIOR TO THE ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicant shall submit to the Executive Director for review and written approval, final landscaping and fence plans approved by the City of San Diego. The plans shall be in substantial conformance with the landscape plans submitted by Mark Mitchell Architecture and Planning dated 3/18/10 and shall include the following:

- a. A view corridor a minimum of 10 ft wide shall be preserved in the north front yard area of the subject site adjacent to Yarmouth Court. All proposed landscaping in this yard area shall be maintained at a height of three feet or lower (including raised planters) to preserve views from the street toward the ocean and along the boardwalk. A maximum of two (2) small trees with thin trunks are permitted, provided they are located close to the building and outside of the 10 ft. wide view corridor and they do not block views toward the ocean.
- b. All landscaping shall be drought tolerant and native or non-invasive plant species. All landscape materials within the identified view corridors shall be species with a growth potential not to exceed three feet at maturity, except for authorized trees. No plant species listed as problematic and/or invasive by the California Native Plant Society, the California Exotic Pest Plant Council, or 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.
- c. Any fencing in the north front yard setback area shall permit public views and have at least 75 percent of its surface area open to light.
- d. A written commitment by the applicants that five years from the date of the issuance of the coastal development permit for the residential structure, the applicants will submit for review and written approval of the Executive Director, a landscape monitoring report, prepared by a licensed Landscape Architect or qualified Resource Specialist, that certifies whether the on-site landscaping is in conformance with the landscape plan approved pursuant to this Special Condition. The monitoring report shall include photographic documentation of plant species and plant coverage.

If the landscape monitoring report indicates the landscaping is not in conformance with or has failed to meet the performance standards specified in the landscaping plan approved pursuant to this permit, the applicants, or their successors in interest, shall submit a revised or supplemental landscape plan for the review and written approval of the Executive Director. The revised

landscaping plan must be prepared by a licensed Landscape Architect or Resource Specialist and shall specify measures to remediate those portions of the original plan that have failed or are not in compliance with the original approved plan.

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

2. Final Plans/ Storage and Staging Areas. PRIOR TO THE ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicant shall submit final site plans to the Executive Director for review and written approval. Said plans shall first be reviewed and approved in writing by the City of San Diego. Said plans shall also be in substantial conformance with the plans submitted by Mark Mitchell Architecture dated 3/18/10 with this application. In addition, said plans shall include written notes stating the following:

- a. No construction staging or storage shall occur on the existing boardwalk, and construction activities shall not impede or block access on the existing boardwalk in any way.
- b. If, during construction, it is determined that any of the exterior walls need to be demolished (beyond those permitted herein), due to the deteriorated condition of the walls (termites, wood rot, etc.), the applicant shall immediately contact the Executive Director to determine if a coastal development permit or amendment to this permit is necessary.

The permittees 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.

3. Future Removal of Non Conformities. If the existing residential structure at 701 Yarmouth Court is substantially altered such that 50% or more of the existing structure is modified, demolished, removed or replaced, or the concrete masonry wall or patio is altered in any way, the applicants, or their successors in interest, shall report such modification of the project plans to the Executive Director. Any such revised or future project shall require removal of all legal non-conforming encroachments into the public right-of-way in their entirety. In addition, any replacement structures shall be subject to the requirement of obtaining a new coastal development permit or an amendment to this permit and shall meet the required building setbacks and first be reviewed and approved in writing by the City of San Diego.

4. Timing of construction. No project construction shall take place between Memorial Day weekend and Labor Day of any year. Construction access corridors and staging areas shall be located in a manner that has the least impact on public access, and, at a minimum, such access corridors and staging areas shall not result in street or public accessway closures or the use of public parking as staging areas.

5. Deed Restriction. PRIOR TO THE ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicant shall submit to the Executive Director for review and approval documentation demonstrating that the applicant has executed and recorded against the parcel(s) governed by this permit 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 the 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 entire parcel or parcels 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 subject property so long that 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.

IV. Findings and Declarations.

The Commission finds and declares as follows:

1. **Detailed Project Description.** Proposed is the remodeling of an existing, two story, 1,814 square foot residential structure containing three units to include interior and exterior renovations and a 477 square foot third floor addition resulting in a three-story, 30 ft. high, 1,906 square foot single family residence with 1 designated on-site parking space. The interior restructuring of the residential building will include the following: a 147 sq. ft. expansion of the first floor garage area resulting in a 321 sq. ft. one-car garage, reconfiguration of the first and second floor interior walls to allow for the construction of a three story elevator shaft, kitchen renovations and remodel of three bedrooms/bathrooms and various living spaces, construction of new second and third floor balcony and deck areas, and landscaping reconstruction of the side yard areas. The existing first floor area will be reduced from 851 sq. ft. to 272 sq. ft. in the proposed remodel, with 147 sq. ft. of the preexisting first floor converted into garage space and the remaining 272 sq. ft. used for a bedroom, bathroom, storage space and entranceway. The existing second floor will be expanded from 789 sq. ft. to 834 sq. ft. and will contain the kitchen, living, dining and second bedroom and bathroom areas. The proposed third floor 477 sq. ft. addition is intended to contain a master bedroom and bathroom suite. The existing residential structure on the subject site is a legal non-conforming building, as its existing structural envelope sits directly on the lot line along Ocean Front Walk

(with no setback) and includes a privacy wall along Yarmouth Court that extends into the designated setback area.

The project site is located along Ocean Front Walk, the public boardwalk that runs along the western side of Mission Beach from the South Mission Beach Jetty north approximately 2.36 miles to Thomas Avenue in the community of Pacific Beach. Ocean Front walk runs north/south along the beach and serves as a highly popular public accessway, as well as a view corridor along the shoreline. The subject site is located on the southern corner of Yarmouth Court and Ocean Front Walk in the Mission Beach community.

Although the City of San Diego has a certified LCP for the Mission Beach community, the subject site is located in an area where the commission retains permit jurisdiction. Therefore, Chapter 3 of the Coastal Act is the standard of review, with the City's LCP used as guidance.

2. Retention of Non-conforming Structures. Section 127.0106 of the City's certified Land Development Code, which the commission uses for guidance, contains the following requirement:

[...]

- (d) Within the coastal overlay zone, if the proposal involves the demolition or removal of 50 percent or more of the exterior walls of an existing structure, the previously conforming rights are not retained for the new structure.

The Commission typically reviews projects to assure that any new proposed development in Mission Beach complies with the City of San Diego's setback requirements and does not encroach into public view corridors of the ocean. However, in this particular residential zone (R-N) there are a number of homes, including the subject site, that retain non-conforming setbacks along Ocean Front Walk. In its approval of past projects involving partial demolition and reconstruction of an existing non-conforming structure, the Commission has found that if more than 50% of the exterior walls of a structure are being demolished, the proposal constitutes the development of a new structure and therefore, the entire structure must be brought into compliance with the current requirements. While the existing development on the subject site presently has no setback from the public right of way (Ocean Front Walk) along 48 feet of its southwestern exterior walls, the proposed remodel will not result in the demolition of over 50% of the exterior walls and thus, would not constitute new development. As such, the residential structure would be allowed to maintain its non-conforming structural walls along Ocean Front Walk, which encroach into the required 7 ft. side yard setback.

Even though the proposed development does not constitute new development, the suggested remodeling of the existing 1,814 sq. ft., three-unit residential structure would entail partial demolition of the structure's exterior walls. Although no more than 50% of the exterior walls are proposed to be removed through the proposed remodel of the

existing building, a significant proportion of exterior walls are still proposed for removal. The applicants' demolition plans propose demolition of 42% of the first floor exterior walls, as well as 49.06% of the second floor exterior walls. As explained above, given that this is less than 50% of the exterior walls, the proposed structure would continue to be regarded as a legal non-conforming structure. It will therefore not be conditioned to meet current setback requirements contained in the Mission Beach Planned District Ordinance. If the applicants discover during construction that additional exterior walls must be demolished, however, the project could meet the threshold for new development, requiring removal of the non-conforming aspects of the structure. The permit is therefore conditioned (Special Condition Nos. 2b & 3) to require the applicants to notify the Executive Director if 50% or more of the exterior walls are demolished, so that the applicants can apply for an amendment to this permit or for a new coastal development permit to revise the project such that the non-conforming elements of the structure are removed. This special condition also provides notice to the applicants and their successors-in-interest of the requirement that the non-conforming aspects of the development shall be removed if 50% or more of the exterior walls are demolished.

Additionally, there is an existing three foot tall privacy wall on the subject site bordering Yarmouth Court which is currently not observing the required three foot courtside yard setback. As no substantial demolition is proposed for this privacy wall, it is permitted to retain its non-conforming location. No records were found of any coastal development permits issued for the privacy wall or the residential structure on the subject site, but the applicants have indicated it was built before the Coastal Act. The proposed third floor would raise the building height to 30 feet, but it would still be in conformance with the height requirements set forth in the Mission Beach Planned District Ordinance.

While the proposed remodel entails no expansion into existing public accesways, as discussed above, the residential structure currently possesses non-conforming walls which extend into the designated 7 foot setback from Ocean Front Walk, as well as the three foot setback along Yarmouth Court. Similarly, there are approximately 20 residential structures in the R-N zone that presently have no setback from the public right-of-way easement, such as the existing development on the subject site. Specifically, these property owners legally built the structures on the "zero lot line" such that the structures' western walls, or portions of the western walls, are directly on the property line and abut the three foot landscape buffer portion of the public-right-of-way. The Commission has a potential concern with bringing these structures into conformity should these properties ever propose to redevelop their existing legally non-conforming structures. Thus, although this particular project proposal does not constitute new development and as such is allowed to maintain the locations of its non-conforming walls, a special condition is required (Special Condition #3), to ensure that should the subject structure ever be altered to the degree that it would consist of new development it would be required to remove its non-conforming walls and to bring the development into conformity with existing setback requirements.

3. Public Views/ Visual Quality/Community Character. Section 30251 of the Coastal Act is applicable to the subject property and states, in part:

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,...

The certified Mission Beach Precise Plan and Local Coastal Program Addendum, which the commission also uses for guidance states:

“Views to and along the shoreline from public areas shall be protected from blockage by development and or vegetation.” (p.14)

In addition, Section 132.0403 of the City’s certified Land Development Code, which the commission uses for guidance, also contains the following requirement:

[...]

- (c) If there is an existing or potential public view between the ocean and the first public roadway, but the site is not designated in a *land use plan* as a view to be protected, it is intended that views to the ocean shall be preserved, enhanced or restored by deed restricting required side *yard setback* areas to cumulatively form functional view corridors and preventing a walled effect from authorized development.

In the Mission Beach community, the designated public view corridors consist of public rights-of-way of the various courts and places which are generally east/west running streets. As the subject property is located directly on Ocean Front Walk at the western terminus of Yarmouth Court, there is the potential for the subject development to impact views to and along the shoreline. However, the proposed remodel and third story addition will not encroach into any existing public ocean view corridors. Additionally, none of the proposed remodeling will increase the degree of non-conformity of the structure nor will any proposed additions be constructed that would increase the height of the existing building such that public views would be diminished or the visual quality of the site would be incompatible with the surrounding area. As such, the proposed structure will not result in any public view blockage to the ocean and the public view corridor from Yarmouth Court and along Ocean Front walk will continue to be available in its current state.

Despite the assured preservation of existing public ocean views in the project proposal, there still remains the potential for proposed landscaping (both initially and over time, as plant materials/trees mature) in the yard areas to impede public views (as seen from the public right-of-way of Yarmouth Court while looking west) to the ocean and along Ocean Front Walk. As such, this permit is conditioned to require that all proposed landscaping within the designated view corridors be constrained to include only such plants that in maturity do not exceed three feet in height and, that any related hardscape materials or side yard accessories be restricted to no higher than three feet in height. This condition

(specified as Special Condition #1 in this document) allows for a maximum of two tall trees, provided they are placed close enough to the building that they are located outside of the view corridor and do not block public views to the ocean. As conditioned, it can be assured that any landscape improvements proposed in the side yard areas will not impede public views toward the ocean. Additionally, Special Condition #5 requires the permit and findings to be recorded to assure future property owners are aware of the permit conditions.

With regard to community character, the existing residences along the boardwalk vary widely in architectural style and appearance. The proposed project will result in a three story, 1,904 sq. ft. single family residence adjacent to Ocean Front Walk and will be visually compatible with the character of the surrounding neighborhood. The proposed structure will be 30 ft. high, consistent with current zoning requirements.

As the existing residential structure on the property was constructed in 1946, an evaluation by the City of San Diego Historic Resources staff was required to determine if it has any historic significance. After a comprehensive review, Historic Resources staff concluded that the existing structure located at 701 Yarmouth Court had undergone significant alterations since its initial construction and would not be considered a potentially Historic Resource by their standards. In summary, the proposed development, as conditioned, will not result in any reduction of public shoreline view corridors and is found visually compatible with the character of the surrounding neighborhood, consistent with section 30251 of the coastal act.

4. Public Access. Coastal Act sections 30210, 30211 and 30212(a) are applicable to the project and state the following:

Section 30210

In carrying out the requirement of Section 4 of Article X of the California Constitution, maximum access, which shall be conspicuously posted, and recreational opportunities shall be provided for all the people consistent with public safety needs and the need to protect public rights, rights of private property owners, and natural resource areas from overuse.

Section 30212

(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 [...]

Section 30211

Development shall not interfere with the public's right of access to the sea where acquired through use or legislative authorization, including, but not limited to, the use of dry sand and rocky coastal beaches to the first line of terrestrial vegetation.

In addition Section 30252 of the Coastal Act is applicable to the proposed project and states the following, in part:

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

The project site is located adjacent to the public beach and Ocean Front Walk. Ocean Front Walk is a heavily-used recreational facility frequented by pedestrians, bicyclists, skaters, skateboarders, runners, and persons in wheelchairs. The walkway is accessible from the east/west courts and streets off of Mission Boulevard, and provides access to the sandy beach at stairways located at various points along the seawall. Access to the beach can be gained nearest to the project site at the western terminus of Yarmouth Court adjacent to the property site to the south. None of the proposed remodeling will expand the existing building envelope into public accessways leading to Ocean Front Walk and will not impact or impede public access to the shoreline. In addition, adequate on-site parking will be provided consistent with Section 30252 of the Act. Thus, current public access to Mission beach will be maintained, pursuant to Coastal Act Section 30212.

In addition, Special Condition #2 requires the submittal of final construction plans that clearly indicate the location of the proposed improvements in relationship to the right-of-way easement. Such plans must demonstrate that all improvements will be constructed no further west than the 3-foot wide landscape buffer area. In order to prevent construction activity from adversely affecting the public's use of the boardwalk, Special Condition #2 also prohibits any staging and storage for the proposed remodel from occurring on the existing boardwalk and prohibits any closure of Ocean Front Walk or other public areas for construction activities.

To address additional concerns regarding construction activities near public accessways on this oceanfront property, this project has been conditioned (Special Condition #4) such that no work shall occur between Memorial Day Weekend and Labor Day of any year. Therefore, the proposed project, as conditioned, will not interfere with public access opportunities and is found consistent with Sections 30210 through 30214, Sections 30220 through 30224, Section 30252 and Section 30604(c) of the Coastal Act.

5. Local Coastal Planning. Section 30604(a) of the Coastal Act requires that a coastal development permit shall be issued only if the Commission finds the proposed 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 is located in the Residential North (R-N) zone of the Mission Beach Planned District. While the City of San Diego has a certified LCP that governs the Mission Beach community, the subject site is located in an area of original jurisdiction, where the commission retains permanent permit authority. The subject permit will result in the remodeling of an existing two story residential structure. The project is consistent with the certified Mission Beach Precise Plan and all applicable Chapter 3 policies of the Coastal Act. Therefore, the Commission finds the approval of the proposed development, as conditioned, will not prejudice the ability of the City of San Diego to continue to implement its certified LCP for the Mission Beach community.

6. 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 protection of public views to the ocean, conditions restricting the timing and extent of construction to avoid impacts on public access, and a condition stating that any future new development on the subject site requires the existing encroachment into required setback areas be removed, ensures that all adverse environmental impacts are minimized. 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.

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OCEAN

MISSION BEACH

MISSION BAY

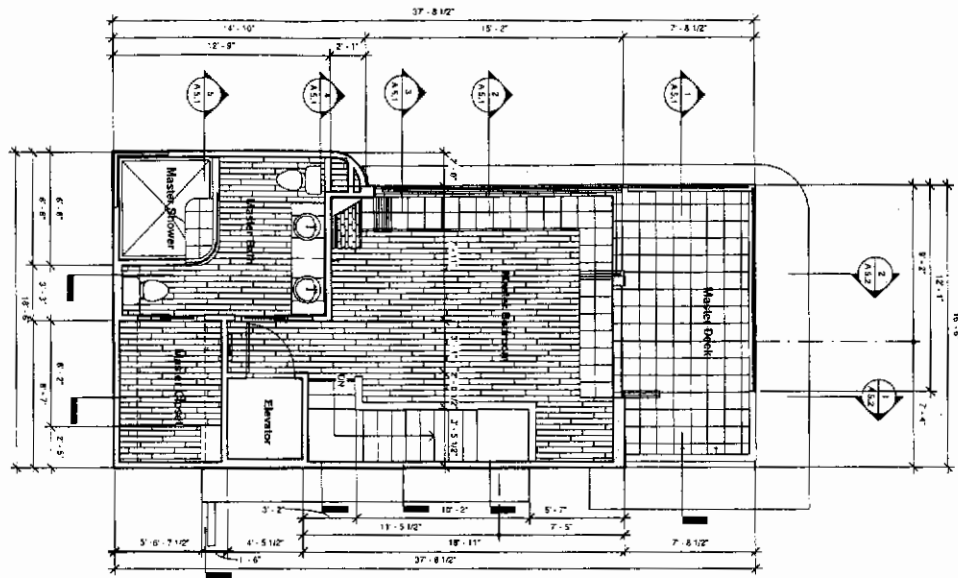
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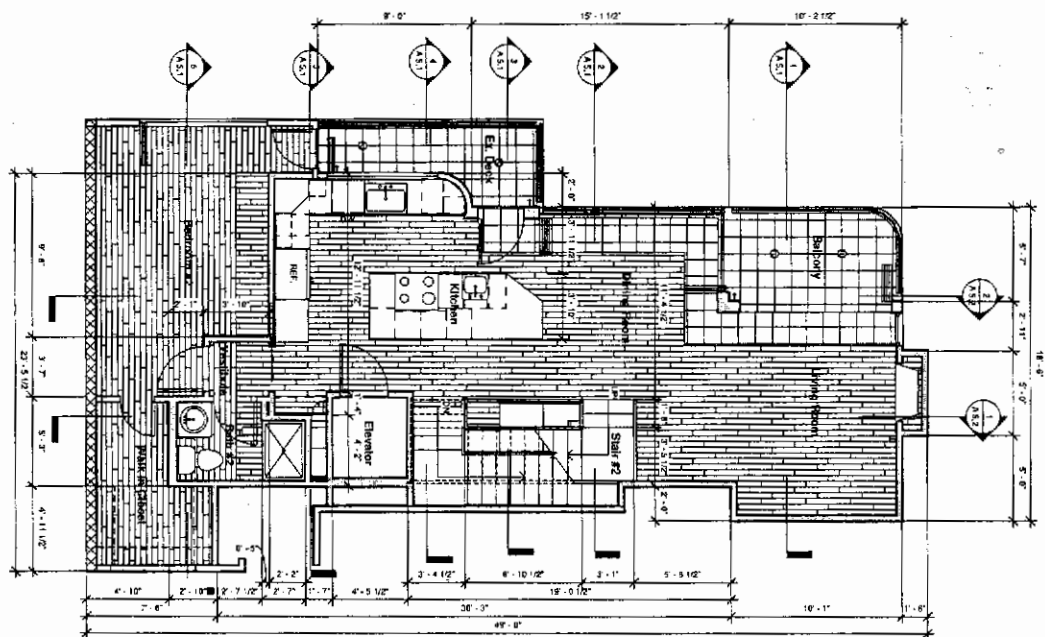
EXHIBIT NO. 1
APPLICATION NO.
6-10-008
Location Map

California Coastal Commission

③ A3.1 Third Floor Dimensions
1/4" = 1'-0"



② A3.1 Second Floor Dimensions
1/4" = 1'-0"



① A3.1 First Floor Dimensions
1/4" = 1'-0"

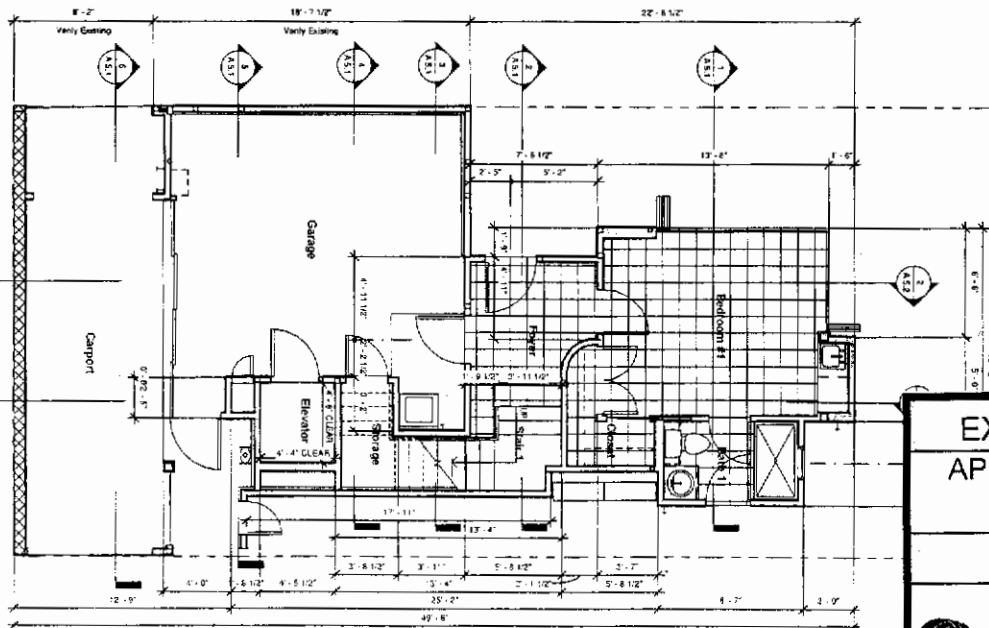
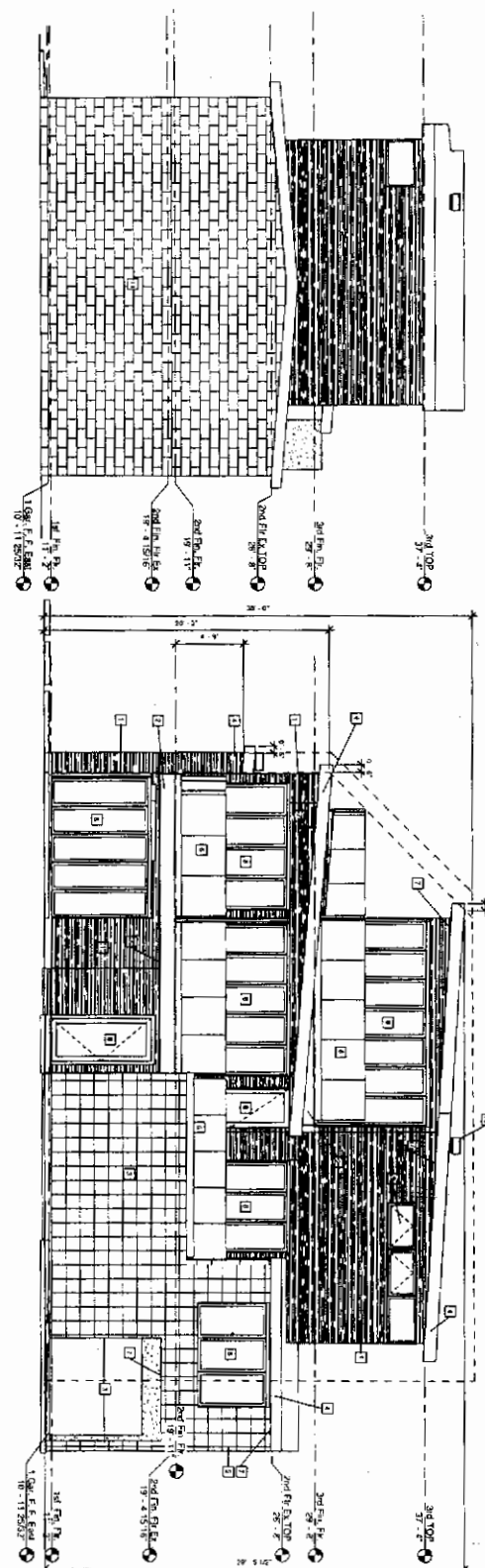


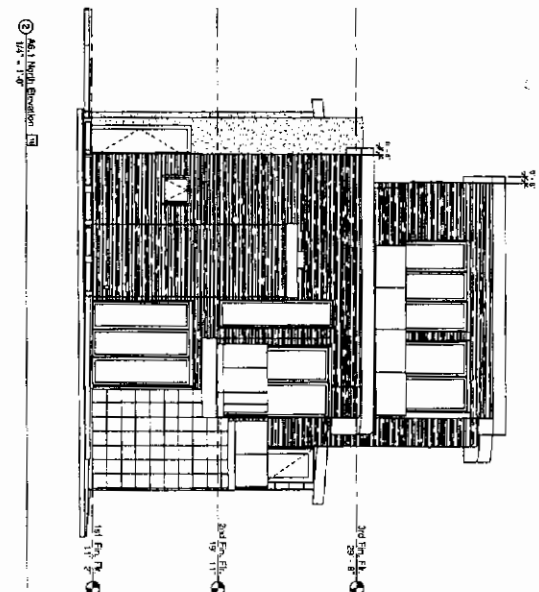
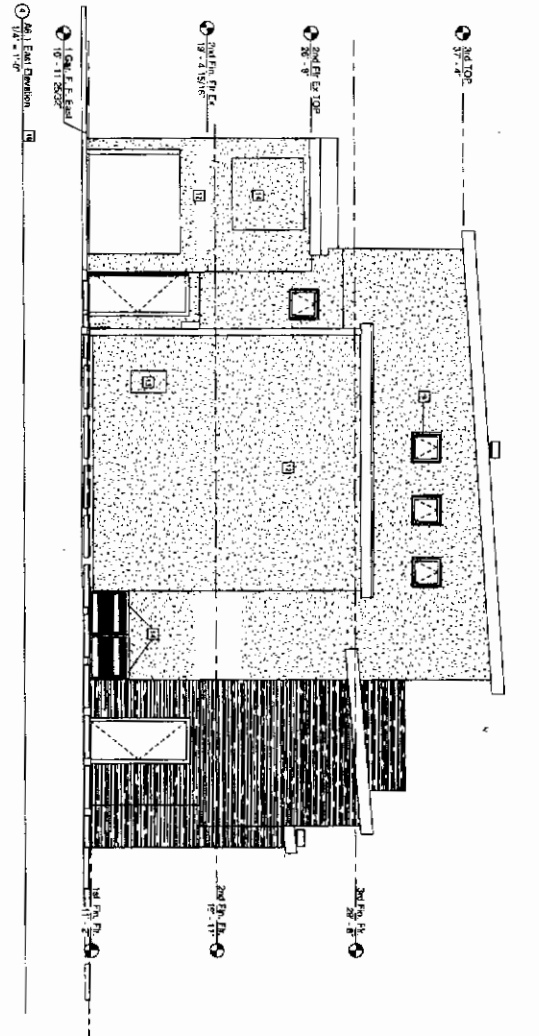
EXHIBIT NO. 3
APPLICATION NO.
6-10-008
Floor Plans



① A-1 Front Elevation
1/8" = 1'-0"

② A-1 Wall Elevation
1/8" = 1'-0"

- THE LOWEST POINT WITHIN THE LOT OF EXISTING AND PROPOSED CHIMNEYS IN EXISTING AND PROPOSED STRUCTURE
- ① EXTERIOR FINISH
 - ② EXTERIOR FINISH
 - ③ EXTERIOR FINISH
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③ A-1 Rear Elevation
1/8" = 1'-0"

MARK MITCHELL
ARCHITECTURE AND PLANNING
1747 MISSION BLVD. SUITE 200, SAN DIEGO, CA 92103 (619) 274-5978



Addition for
Mr. and Mrs. K...

EXHIBIT NO. 4

APPLICATION NO.

6-10-008

Elevations

California Coastal Commission

