

**CALIFORNIA COASTAL COMMISSION**

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# Th15a

**6-18-0182 (HARRIS)**

**OCTOBER 11, 2018**

## **EXHIBITS**

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# Applicant GSL vs. CCC GSL

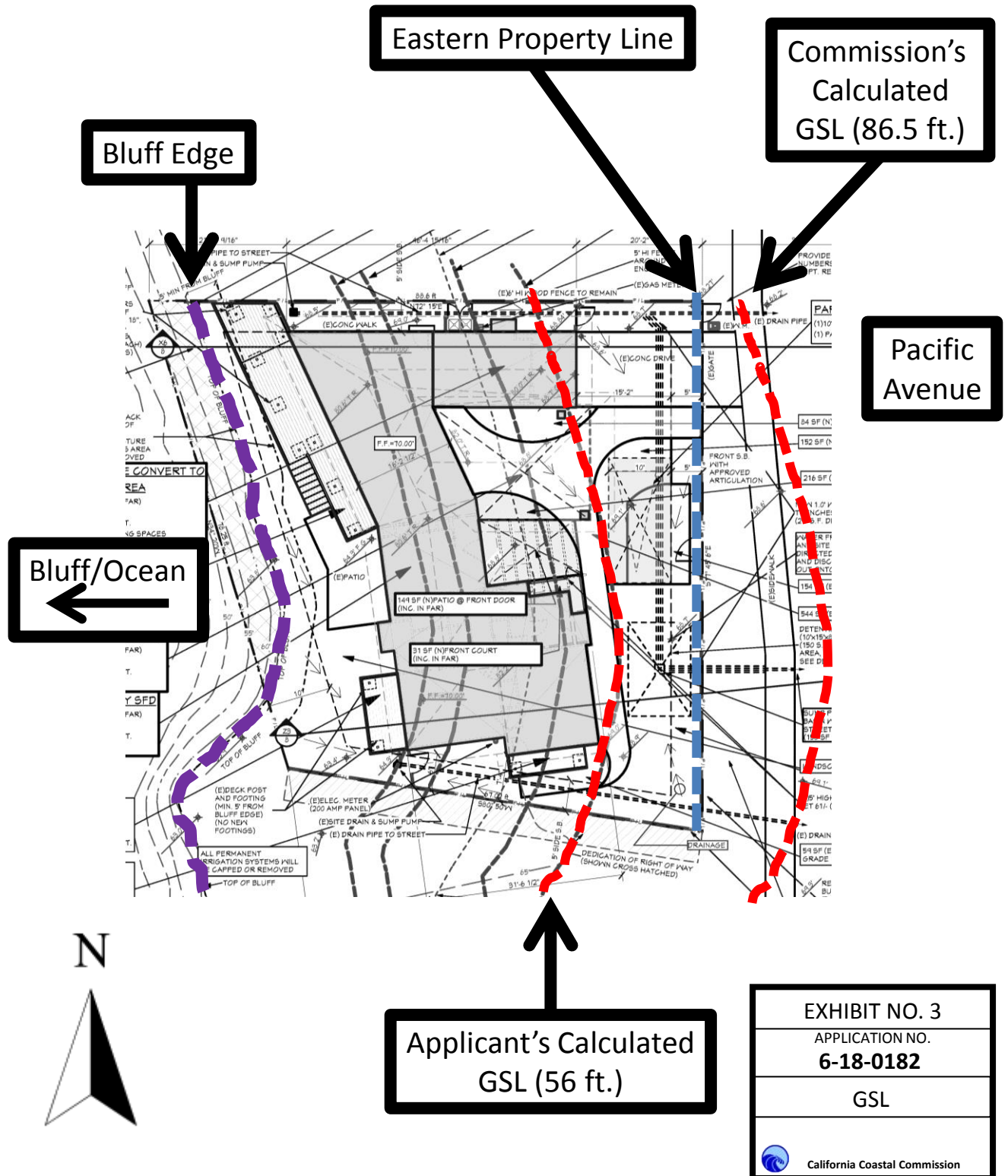


EXHIBIT NO. 3
APPLICATION NO. <b>6-18-0182</b>
GSL
 California Coastal Commission

# Aerial Site Photo 1



EXHIBIT NO. 4
APPLICATION NO. <b>6-18-0182</b>
Aerial Photo 1
 California Coastal Commission

# Aerial Site Photo 2

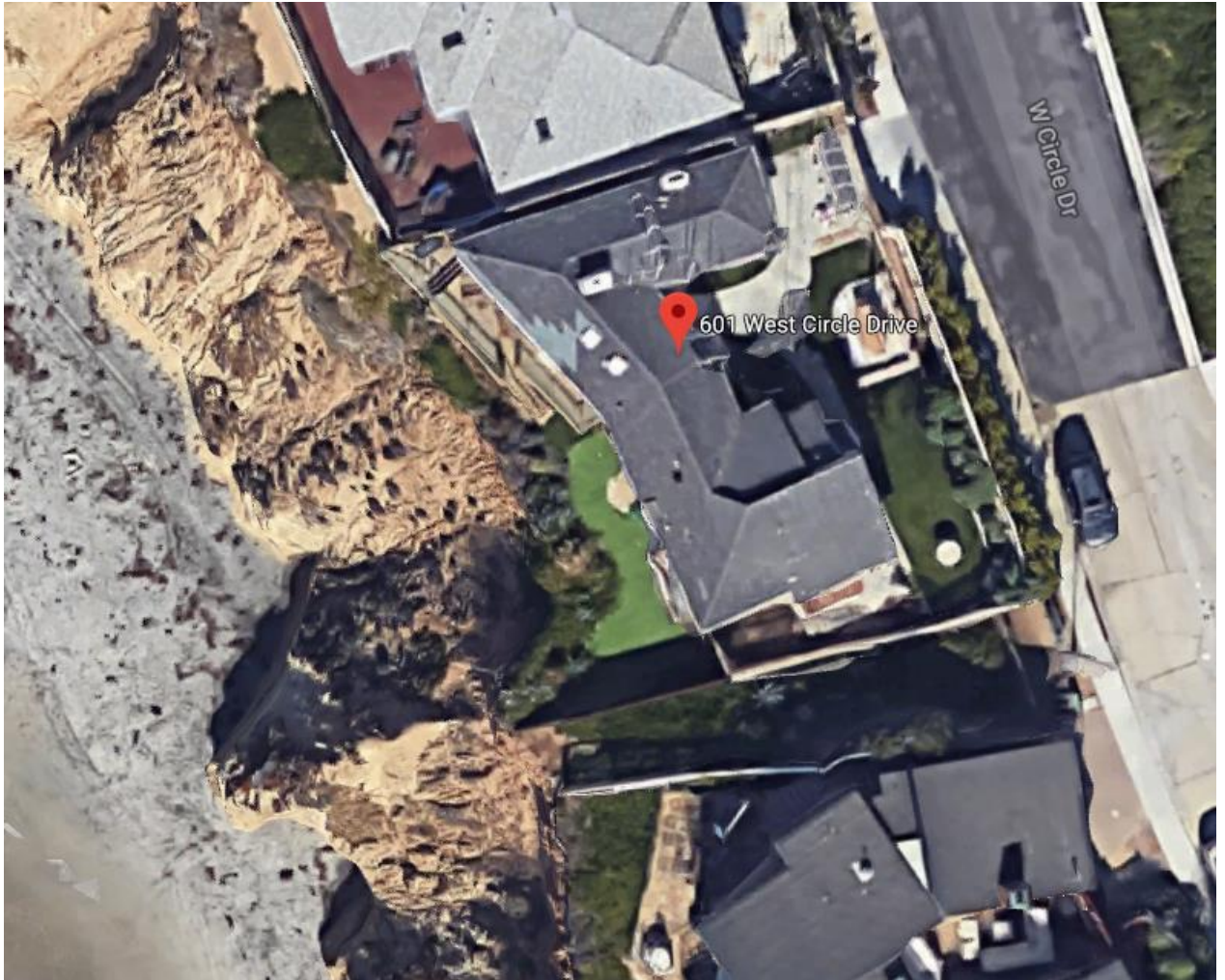


EXHIBIT NO. 5
APPLICATION NO. <b>6-18-0182</b>
Aerial Photo 2
 California Coastal Commission

# Street View Photo



EXHIBIT NO. 6
APPLICATION NO. <b>6-18-0182</b>
Project location
 California Coastal Commission

# Front Yard Photo 1



EXHIBIT NO. 7

APPLICATION NO.

**6-18-0182**

Front yard 1



California Coastal Commission



# Front Yard Photo 2



EXHIBIT NO. 8

APPLICATION NO.

**6-18-0182**

Front Yard 2



California Coastal Commission

# Rear Yard Photo



EXHIBIT NO. 9

APPLICATION NO.

**6-18-0182**

Rear Yard Photo



California Coastal Commission

# Existing East/West Elevation Plans

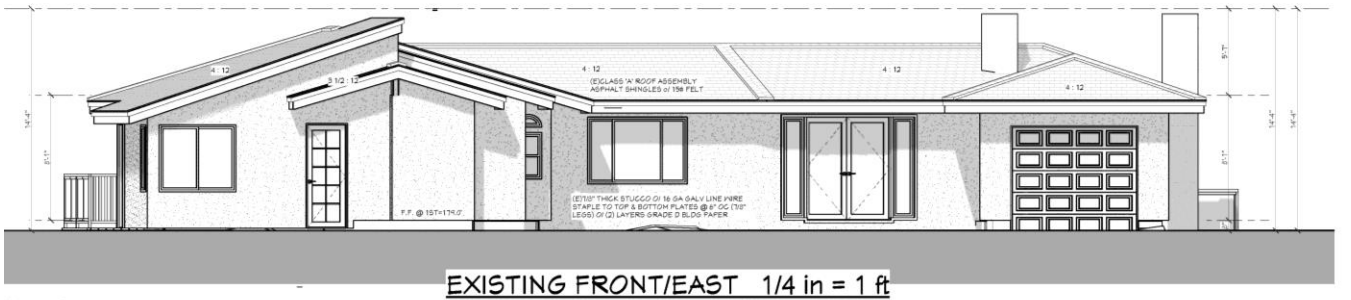
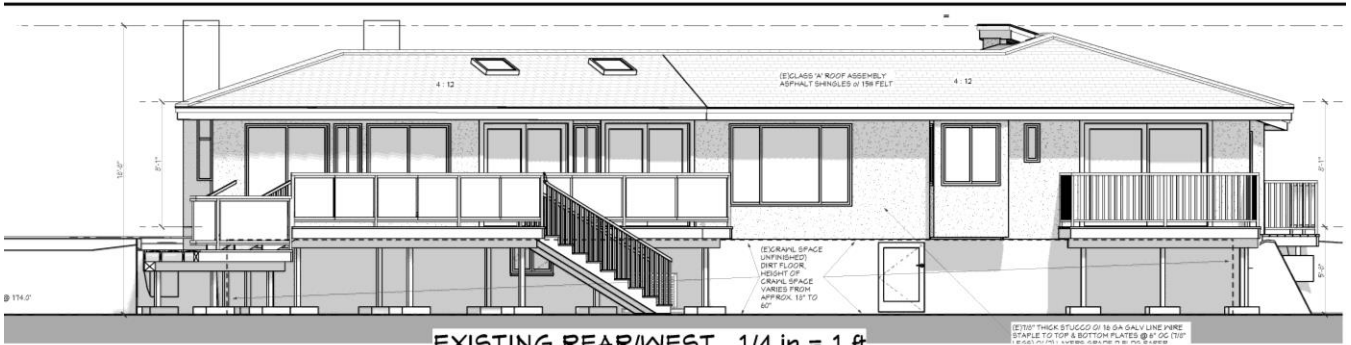

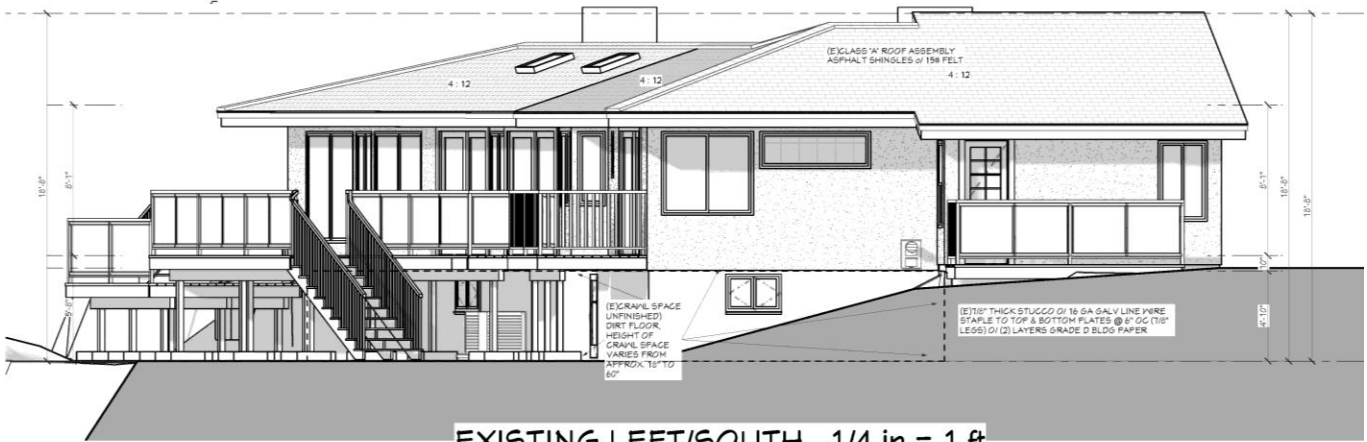
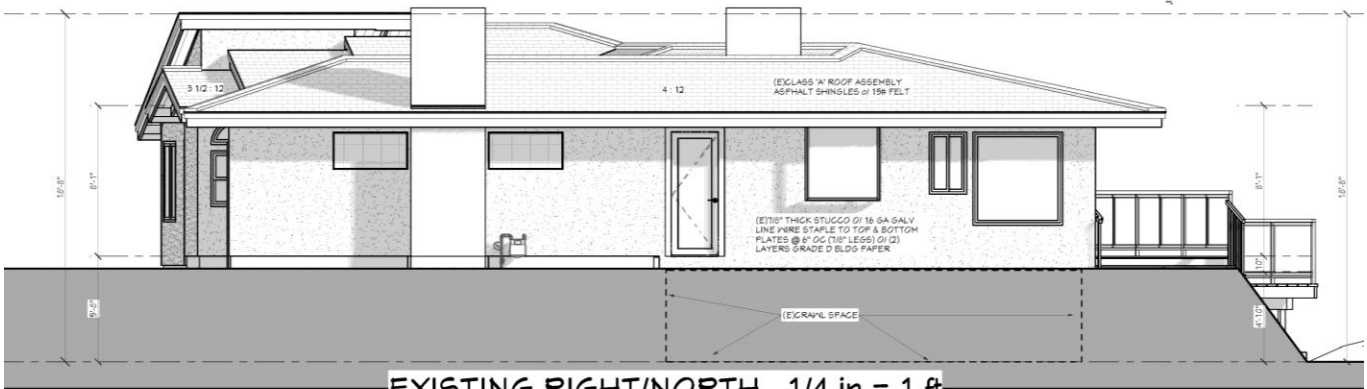


EXHIBIT NO. 10
APPLICATION NO. <b>6-18-0182</b>
Ext. E/W Elevations
 California Coastal Commission

# Existing South/North Elevation Plans



**EXISTING LEFT/SOUTH 1/4 in = 1 ft**



**EXISTING RIGHT/NORTH 1/4 in = 1 ft**

**EXHIBIT NO. 11**

APPLICATION NO.

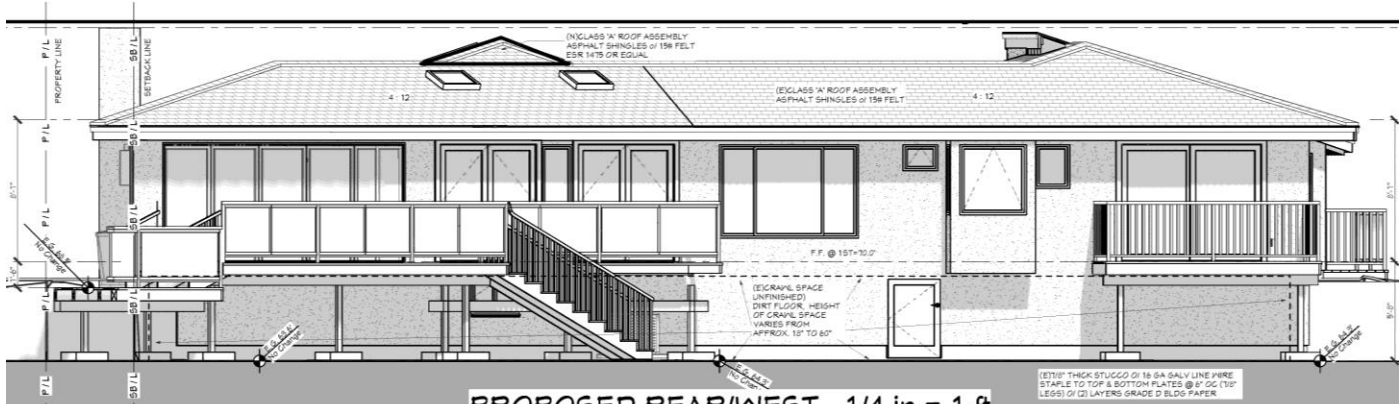
**6-18-0182**

Ext. S/N Elevations

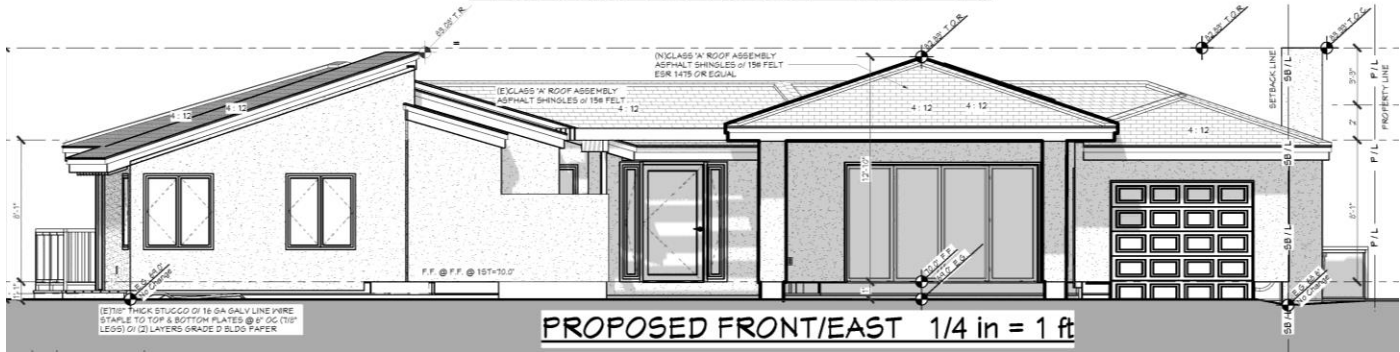


California Coastal Commission

# Proposed East/West Elevation Plans



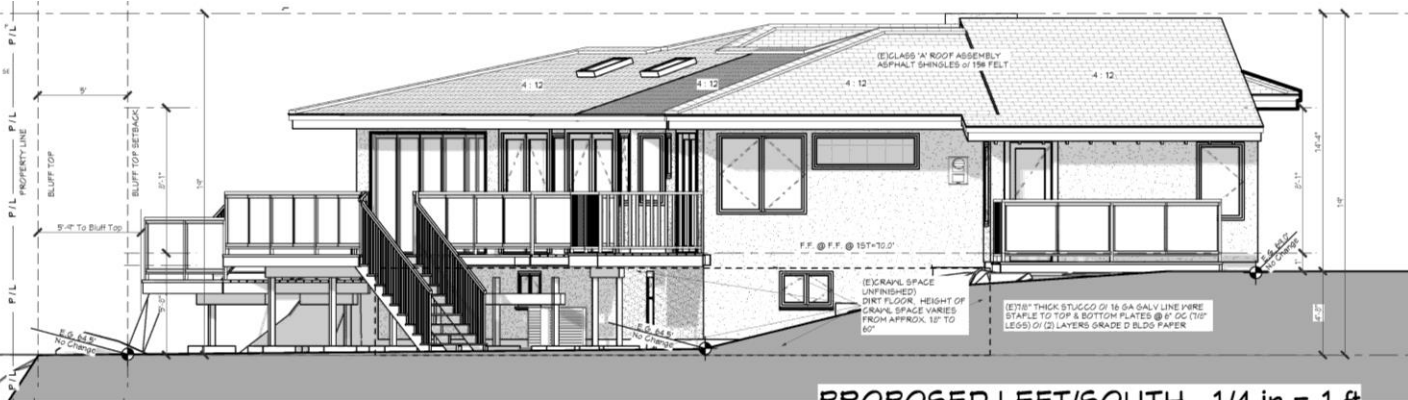
**PROPOSED REAR/WEST 1/4 in = 1 ft**



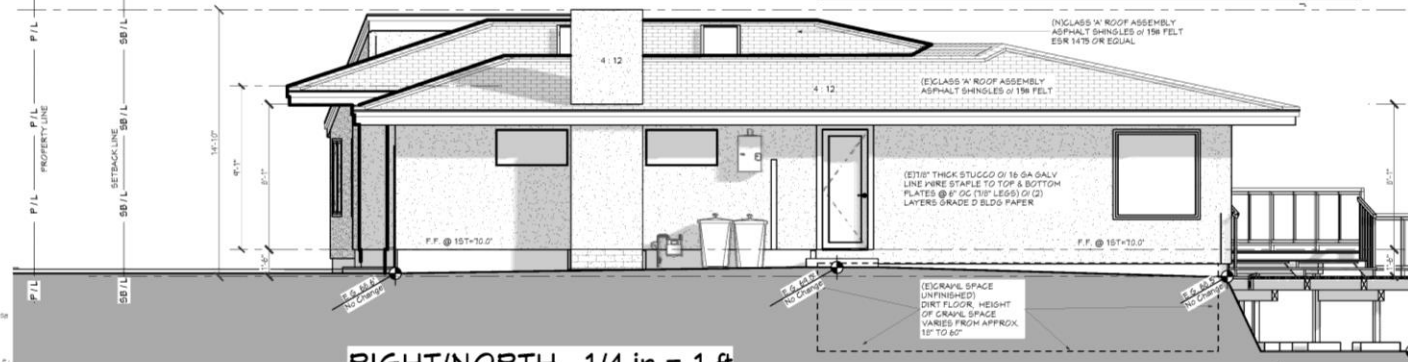
**PROPOSED FRONT/EAST 1/4 in = 1 ft**

EXHIBIT NO. 12
APPLICATION NO. <b>6-18-0182</b>
Prop. E/W Elevations
 California Coastal Commission

# Proposed South/North Elevation Plans



**PROPOSED LEFT/SOUTH 1/4 in = 1 ft**



**RIGHT/NORTH 1/4 in = 1 ft**

PLAN APPROV.  
OWNER  
OWNER

EXHIBIT NO. 13

APPLICATION NO.

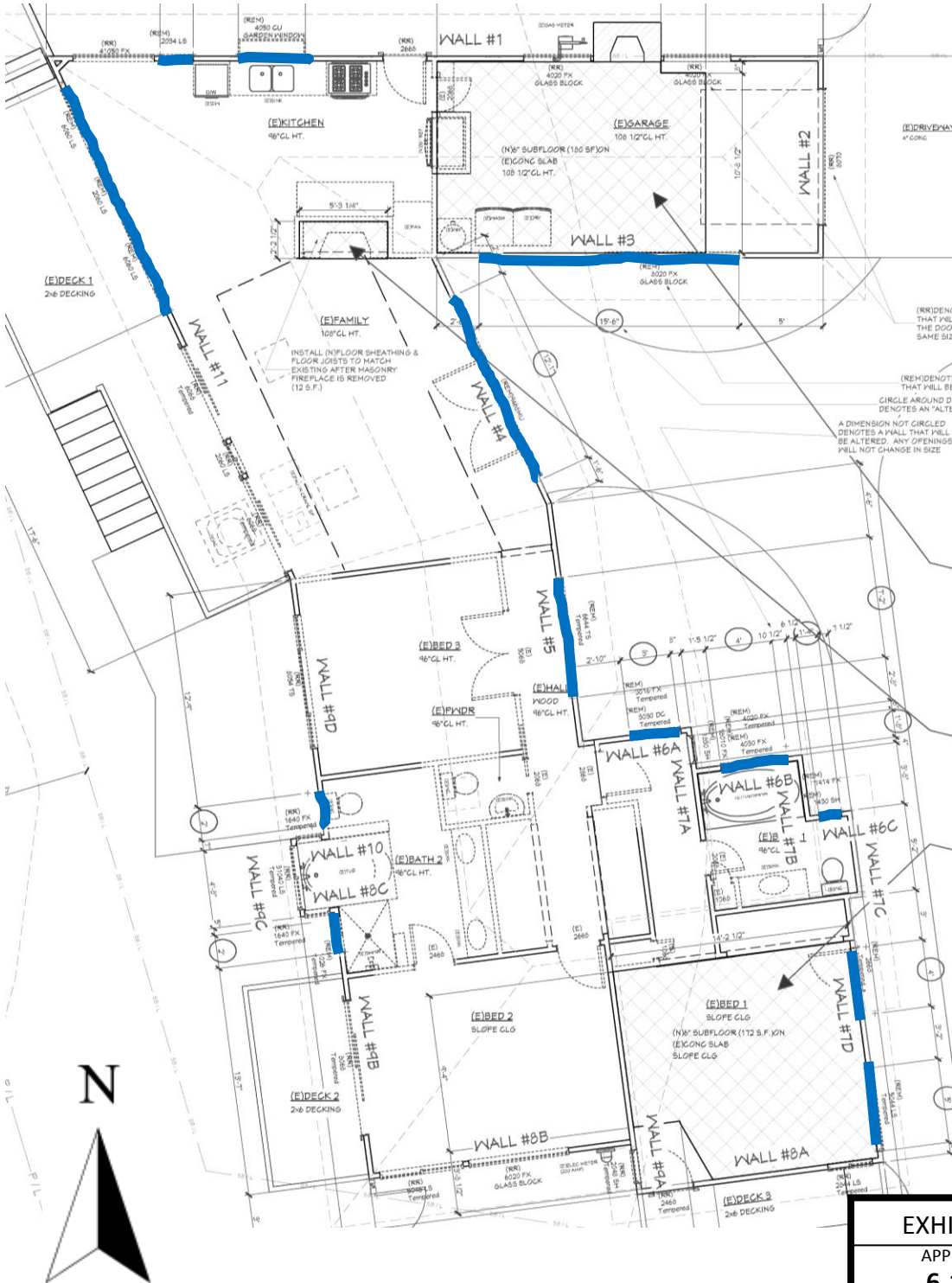
**6-18-0182**

Prop. S/N Elevations




California Coastal Commission

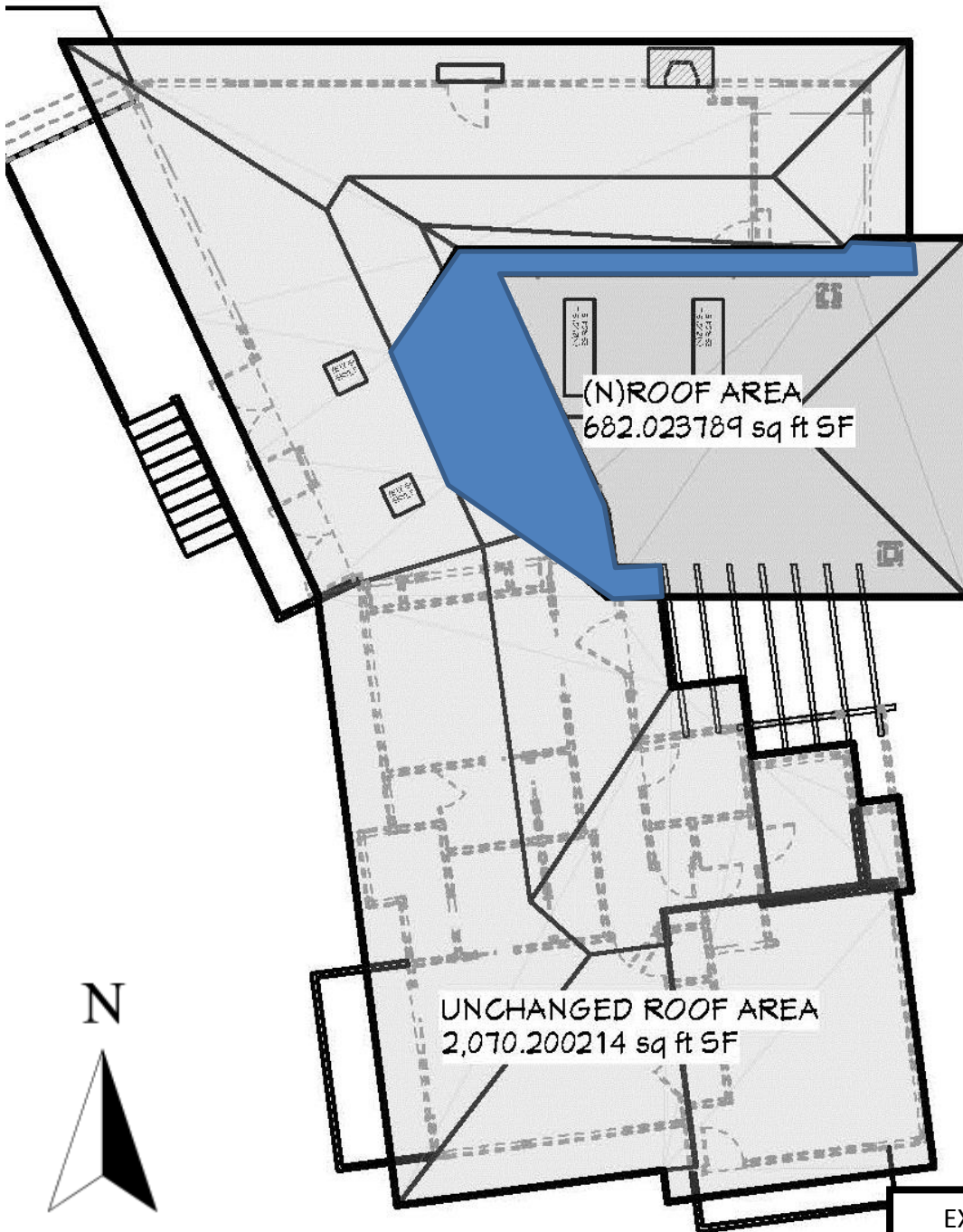
# Proposed Exterior Wall Alterations



Altered Exterior Walls (30%)

EXHIBIT NO. 14
APPLICATION NO.
<b>6-18-0182</b>
Prop. Ext. Wall Alt.
 California Coastal Commission

# Proposed Roof Structure Alterations



Altered Roof Structure (14%)

EXHIBIT NO. 15
APPLICATION NO. <b>6-18-0182</b>
Prop. Roof Alt.
 California Coastal Commission





# Non-Filing Letter

EXHIBIT NO. 17

APPLICATION NO.

**6-18-0182**

Non-Filing Letter



California Coastal Commission

**CALIFORNIA COASTAL COMMISSION**

SAN DIEGO AREA  
7575 METROPOLITAN DRIVE, SUITE 103  
SAN DIEGO, CA 92108-4421  
(619) 767-2370



April 6, 2018

Jim Dyjack  
742 D Genevieve  
Solana Beach, CA 92075

Re: Coastal Development Permit Application #6-18-0182/Harris

Dear Mr. Dyjack:

Commission staff has reviewed the above cited permit application for a substantial remodel to an existing 1,544 sq. ft. bluff top single family home with an existing attached 281 sq. ft. garage at 601 W. Circle Drive in Solana Beach. As shown on the submitted project plans, approximately 30% of the exterior walls would be altered, approximately 20% of the existing floor structure would be altered, and approximately 14% of the existing roof structure would be altered. In addition, the 281 sq. ft. garage is proposed to be converted into living space and construction of 559 sq. ft. of new, partially enclosed patios is proposed. The City determined that the garage conversion and new patios are additions to the floor area of the home. The existing floor area of the home is 1,625 sq. ft., which under the provisions of the City's certified Land Use Plan consists of the total enclosed area of the home minus a 200 sq. ft. parking exemption. The proposed improvements result in an approximately 47% increase in floor area.

The existing home was constructed in 1951. In 1997, the Commission approved a Coastal Development Permit (CDP) to construct a 357 sq. ft. addition to the home (6-97-008). In 2014, a CDP exemption was granted for replacement of the existing asphalt roofing, exterior stucco, exterior doors and windows, a new shade structure, and interior improvements (CDP Exemption #6-14-0323-X).

After close review of the proposed development, staff believes that the project raises serious concerns with regard to consistency with the City's certified Land Use Plan (LUP) and the coastal resource protection policies of the Coastal Act. As identified in the submitted plans, the current structure is located as close as 15 ft. from the bluff edge. Thus, the home is currently located in a hazardous area, and is considered a non-conforming structure. The shoreline hazard policies of the LUP are designed to ensure that development does not take place in an unsafe location that is likely to require shoreline protection within the life of the development. This is the case regardless of whether there is existing shoreline protection on site, because new development can trigger the need for additional bluff protection, or prolong the need for the existing protection. Thus, numerous policies of the LUP limit or prohibit work from occurring on a bluff top within the area determined to be at risk, that is, seaward of the Geologic Setback Line (GSL).

Determination of the GSL is required for each bluff top project in order to identify an adequate setback to avoid the need for future landform alteration and impacts to public resources. The proposed project includes development on the seaward side of the residence

in the form of alterations to the existing exterior walls. Improvements and upgrades to the non-conforming portions of a bluff top home that increase the economic life of the structure in a hazardous location reduce incentive to increase the setback to reduce risk and avoid bluff retention devices in the future. Significant improvements that extend the life of non-conforming bluff top structures should be limited and a thorough analysis of any improvements to portions of bluff top structures located seaward of the GSL must be undertaken. In this case, for all practical purposes, the project would reconstruct significant portions of the westernmost side of the home, which is the area that is most likely to be threatened as the coastal bluff continues to erode. The amount of redevelopment proposed with the subject project is a significant investment in the aging home and as such, may not be consistent with Section 30253 of the Coastal Act or the certified LUP.

The Commission is not required to approve bluff top development projects even if the proposed alterations remain below the 50% bluff top redevelopment threshold because of the effects described above. This is especially the case when proposed improvements to non-conforming structures would increase the degree of non-conformity. That is, changes to major structural components seaward of the GSL are discouraged by the LUP, and must be considered in light of existing and future impacts to coastal resources and the potential need for future bluff retention devices.

At this time, staff has determined that additional information is necessary in order to properly review this application and schedule it for public hearing. Please provide the following:

- The applicants' geotechnical report asserts that the estimated long-term erosion rate for the western bluff edge is 0.1875 feet per year which would result in approximately 14 feet of erosion over a 75 year period. This estimated erosion rate is significantly lower than the estimated erosion rate of 0.4 feet per year found in the 2013 geotechnical report for the subject site. Furthermore, in the response to the third party review geotechnical comments, the applicant's representatives state they have "...recalculated the 75-year erosion rate based on current information for erosion that includes sea level rise, and we have concluded that there is no change in this area of Solana Beach."

However, neither the current geotechnical report nor the response to third party geotechnical comments include any rationale to explain why sea level rise will not have an effect on the predicted erosion rate as required by the City's LUP. The estimated long-term erosion rate that the Commission typically applies to the calculation of setbacks for new blufftop development in this portion of Solana Beach is 0.46 feet per year. This erosion rate was most recently applied by the Commission in 2017 for a property approximately 800 ft. to the south of the subject site (CDP 6-17-0239/Mansukhani). The erosion rate used by the Commission is the upper bound of the historic rate (1932-1994) measured by Benumof and Griggs (1999) in a peer-reviewed, FEMA-funded study making use of then recognized state-of-the-art photogrammetric techniques. The upper bound is used as a proxy for the average rate expected over the life of proposed new blufftop development (75 years) to account for increases in the bluff erosion rate due to sea level rise. Please provide an analysis

that explains why the estimated erosion rate for this site is now projected to be significantly lower than both what was projected for the site in 2013 and for the nearby lot to the south. Please also provide documentation of the conclusion that sea level rise will have no effect on the erosion rate.

- The City staff report states that the calculated 1.5 Factor of Safety (FOS) setback on the site is 31 ft. from the bluff edge. It is not clear to Commission staff where this setback is identified in the geotechnical report. The May 21, 2017 geotechnical letter by GEI states that the geotechnical consultants have reviewed and accept all findings of the 2013 TerraCosta geotechnical report for the subject site. However, Figure 1 of the 2013 TerraCosta geotechnical report appears to depict the 1.5 FOS landward of the 40 ft. bluff edge setback line. Please clarify and provide supporting documentation related to the location of the 1.5 FOS.
- In past projects, the Commission has defined the total "alteration" of existing exterior walls as a combination of any proposed demolition or replacement, exterior walls becoming interior walls, exterior walls altered through removal or resizing of windows or doors, and exterior walls altered through modifications to the foundation. In addition, portions of the existing exterior walls that are proposed to be fortified with new 2x4's or 2x6's, which would effectively result in the reconstruction of the walls and further extend the life of the structure, should also be included as "alteration" of the exterior wall. Please confirm that the calculations included in the exterior wall demolition plan reflects this approach, as it is not clear from the submitted plans that these types of alterations have been accounted for.
- The City staff report states that approximately 20% of the foundation will also be altered, although the alteration is not identified on the plans. Please provide plans and a detailed description of any alterations to the foundation.
- The application states that the project will result in ~9 CY of exported material. Please identify the export location or propose to dispose of the material outside of the coastal zone.

Please do not limit your submittal to the above mentioned items. You may submit any information which you feel may help Commission staff gain a clear understanding of the scope of your project.

The subject home is located 800 feet north of one of the City's primary beach access stairways (Tide Beach Park). As such, available public parking resources must be preserved and enhanced when possible. The project includes conversion of the existing two-car garage to living space, resulting in the provision of only one on-site parking space. The City's LUP Policy 4.23 requires that each home provide two off-street parking spaces, with a possible reduction to one space *when setbacks and other development standards could preclude the construction of a home*. In this case, there is already a home on the subject site, a new home is not proposed, and the conversion of garage area to living space would not increase the geologic setback of the home or in any way reduce the existing structure's risk from geologic hazard. Thus, the proposed elimination of one on-site parking space on the site for

April 6, 2018

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the purposes of increasing the floor area of the existing home is inconsistent with the purpose and intent of the LUP policy. The reduction in off-street parking would almost certainly result in an adverse impact to available public beach access parking, and is unlikely to be supported by Commission staff.

In addition, please be aware that the city's certified LUP requires that existing or potential public views shall be designed and sited in a manner so as to preserve or enhance designated view opportunities. It appears that public views of the ocean from Pacific Avenue through both the north and south side yard view corridors are currently blocked by fencing or vegetation. The Commission typically requires that any gates or fencing on side yards be a minimum 75% transparent and that landscaping be a maximum of three feet in height to allow for public views of the ocean.

As guidance on the Coastal Act and LUP policies relevant to redevelopment on bluff tops, I recommend that you review the Commission's recent action on CDP 6-17-0239/Mansukhani at 475 Pacific Avenue. The staff report for that project can be found on the Commission's website on the June 7, 2017 agenda. In that case, the redevelopment moved the westernmost portion of the existing structure landward and did not include any structural improvements seaward of 39.5 from the bluff edge (the expected 75 year erosion setback with an additional 5 ft. buffer). Because some minor improvements to the home seaward of the GSL were still proposed, the applicant was also required to waive any rights to future shoreline armoring and to agree that the bluff top residence will only remain as long as it is reasonably safe from failure and erosion without having to propose any shoreline armoring to protect the home in the future. With these conditions, the Commission was able to find the project would not result in an increased need for shoreline protection, consistent with the City's LUP and the coastal resource protection policies of the Coastal Act.

When all required information is received, reviewed by staff and found to be adequate to analyze the project, your application will be filed and scheduled on the next available Commission agenda.

Sincerely,

A handwritten signature in black ink, appearing to read 'Eric Stevens', written in a cursive style.

Eric Stevens

# Bluff Photo 1 (September 18, 2018)



EXHIBIT NO. 18

APPLICATION NO.

**6-18-0182**

Bluff Photo 1



California Coastal Commission

# Bluff Photo 2 (September 18, 2018)



EXHIBIT NO. 19

APPLICATION NO.

**6-18-0182**

Bluff Photo 2



California Coastal Commission



# Bluff Photo 3 (September 18, 2018)



EXHIBIT NO. 20

APPLICATION NO.

**6-18-0182**

Bluff Photo 3



California Coastal Commission

# Bluff Photo 4 (September 18, 2018)



EXHIBIT NO. 21

APPLICATION NO.

**6-18-0182**

Bluff Photo 4



California Coastal Commission



## THE JON CORN LAW FIRM

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CARDIFF BY THE SEA • CALIFORNIA 92007  
www.joncornlaw.com • 760-944-9006

# Th15a

October 4, 2018

Chair Dayna Bochco and Commissioners  
California Coastal Commission  
San Diego Area  
7575 Metropolitan Drive, Suite 103  
San Diego, CA 9218-4421

**Via Electronic Submission Only**

RE: CDP Application No. 6-18-0182; Scott and Lisa Harris, 601 West Circle Drive, Solana Beach, CA (APN 263-21-01)

Dear Chair Bochco and Commissioners:

We represent Scott and Lisa Harris, owners of a single family home located at 601 West Circle Drive in Solana Beach, California (APN 263-21-01). We have reviewed the Staff Report for the October 11, 2018 hearing on this project (CDP application No. 6-18-0182). We respectfully disagree with Staff's recommendation to deny the Harris' CDP application, and request that the Commission approve the application, permitting the Harris' to proceed with their home renovation as approved by the City of Solana Beach. (See Exhibit "A", February 14, 2018 Staff Report for City of Solana Beach DRP for 601 W. Circle Drive; Case No. 17-17-13, and attachments.) We would also like to point out several important discrepancies in Staff's description of the scope of the proposed project, which should alter the Commission's findings and support a decision to approve a CDP for the project.

The Harris' seek approval of a CDP application for a very modest renovation to their existing legal non-conforming 1,544 square foot single story home, which was originally built in 1951. The Harris' home is located on a 5,726 square foot bluff top lot, approximately 800 feet north of the Tide Beach Park public access stairway in Solana Beach.

EXHIBIT NO. 22
APPLICATION NO. <b>6-18-0182</b>
Applicant Response
 California Coastal Commission

Contrary to Staff's characterization of the project, the Harris' are not seeking to expand the size or footprint of the existing structure. Nor are they seeking to substantially alter any major structural components of the home. Indeed, the proposed renovation will maintain the existing structure and the footprint of the existing home while modestly increasing the usable living space in the home and removing all existing improvements that are located within five feet of the bluff edge. This will be achieved by expanding the dining/family room into a portion of the existing attached single car garage. Additionally, the Harris' plan to make their existing (inland) outdoor courtyard area more usable through the addition of a roof structure to partially cover the outdoor patio space in the front portion of their home. Finally, the Harris' will remove the hardscape and fencing that is within the five-foot bluff edge setback.

Specifically, the proposed renovation will result in a 180 square foot total increase in interior livable floor space (resulting from the partial conversion of the existing attached garage) and the enhancement of 559 square feet of existing outdoor space (included as gross floor area pursuant to the City's municipal code). Since the Harris' propose to convert only a 180 square foot portion of the existing 281 square foot garage<sup>1</sup> into living space, and to cover 421 square feet of the existing 559 square foot outdoor courtyard area by extending the existing roof (with the remaining 138 square feet to be partially shaded with a trellis), this application does not propose any expansion of existing structural floor area. (See Exhibits 2 and 8 to Staff Report and Exhibit "B," October 3, 2018 email correspondence from J. Dyjak to E. Stevens, ref. site plan error.)

The CDP application also seeks the approval of interior remodeling plans to update the existing kitchen and bathrooms, and remove and replace the existing windows and doors, which will include the alteration of 30% of existing walls to accommodate the new openings. The proposed addition of a La Cantina folding door will require the removal and replacement of an existing structural support beam on the western (seaward) side of the home. Additionally, the application proposes the removal of an original fireplace and its foundation from the living room of the home. (See Exhibit 14 to Staff Report.)

Finally, raised wood flooring will be installed over existing concrete slabs in the garage and guest bedroom to create consistently leveled floors throughout the home. However, the existing concrete slabs will not be modified. The Harris' intend to install a vapor barrier over the existing concrete slab in the portion of the garage that will be converted into living space. Subsequently, wood flooring will be installed on top of a plywood subfloor over the existing concrete slab in the garage and in one of the guest bedrooms where the floor level is currently lower than the floor in the rest of the home. This will not require any structural alterations or the installation of a new concrete slab. (See Exhibit 16 to Staff Report.)

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<sup>1</sup> The remaining approximately 101 feet of the existing garage will serve as a laundry area that will be accessed through the existing garage door opening.

Below is a rendering of the exterior of the proposed renovated structure:



There are no provisions in the certified City of Solana Beach Certified Land Use Plan (“LUP”) or Coastal Act precluding the Harris’ from making these modest improvements to their home. Indeed, the LUP provides, as follows:

Existing, lawfully established structures that are located between the sea and the first public road paralleling the sea (or lagoon) built prior to the adopted date of the LUP that do not conform to the provisions of the LCP shall be considered legal non-conforming structures. **Such structures may be maintained and repaired, as long as the improvements do not increase the size or degree of non-conformity.** Additions and improvements to such structures that are not considered Bluff Top Redevelopment, as defined herein, may be permitted provided that such additions or improvements themselves comply with the current policies and standards of the LCP. (Policy 4.14, emphasis added.)

The City of Solana Beach accurately concluded that the Harris residence is an existing legal non-conforming structure, as it was built in 1951 and is currently located within the bluff edge setback. Importantly, the City also accurately determined that the proposed renovation would not increase the size or degree of the non-conformity, as the Harris’ do not seek to expand the existing structure.

Pursuant to the certified LUP, a bluff top home may continue its legal non-conforming status; however, a “Bluff Top Redevelopment” shall cause the pre-existing non-conforming home to be brought into conformity with the LCP. (LUP Policy 4.29.)

Staff appropriately concedes that the Harris’ proposed renovation does not fall within the City of Solana Beach Certified LUP definition of “Bluff Top Redevelopment,” which is defined as additions to an existing structure, or exterior and/or interior renovations which result in:

- (a) Alteration of 50% or more of major structural components including exterior walls, floor and roof structure, and foundation, or a 50% increase in floor area, or
- (b) Demolition, renovation or replacement of less than 50% of a major structural component where the proposed alteration would result in cumulative alterations exceeding 50% or more of a major structural component... (LUP Policy 4.29.)

As the Harris' do not propose to alter 50% or more of major structural components, the proposed renovation is not "Bluff Top Redevelopment" as defined by Policy 4.29. Therefore, pursuant to Policy 4.29 of the Certified LUP, the Harris' are not required to bring their existing non-conforming home into conformity with current standards in order to complete this proposed renovation.

Nonetheless, Staff recommends denial of the project based on an unsupported conclusion that the "substantial amount of alternations suggests that the project will likely increase the lifespan of the structure." Staff speculates, since the existing home is a pre-Coastal structure, under Section 30235, "it may be entitled to some form of shoreline armoring to provide protection for the life of the home, provided that the home was shown to be in imminent danger from erosion."

Staff fails to cite any authority to support their conclusion that the Harris' should not be allowed to improve and update their home utilizing the existing structure, within the existing footprint, simply because they believe the home may at some unknown point in the future be in imminent danger from erosion, so as to require shoreline protection, which could infringe upon the public access provisions of the Coastal Act. There is no evidence suggesting that the home is currently in imminent danger from erosion or that the home currently requires shoreline protection. Consistent with the varied coastline and geology of the bluff throughout Solana Beach, there are no sea caves directly below the Harris' property. Moreover, there is no evidence that the renovation project proposed by the Harris' will have any impact upon erosion or that it would exacerbate the danger that erosion would impose. Indeed, the Harris' are not proposing the addition of any structural components that would cause erosion to the bluff or place the home in greater danger, thus requiring shoreline protection. Importantly, the Harris' geotechnical consultant, Geotechnical Exploration, Inc., opined in May 24, 2017 correspondence, "We do not believe that the proposed improvements will have any impact on bluff stability." Finally, the Harris' are not seeking a CDP for shoreline armoring. Thus, it would be inappropriate for the Commission to deny the CDP application based on an unfounded assumption that the home may one day require, and would be entitled to, shoreline protection.

Staff's concerns related to the public view corridor were previously addressed by the City of Solana Beach, which conditioned the approval of the project upon the Harris' agreement to maintain all bushes at or below the height of the existing fence. This will

enhance the view corridor, providing the public with more expansive views of the ocean from the street.

Denial of a CDP for the Harris’ proposed project would be fundamentally unfair, as it would unreasonably single out the Harris’ to be treated differently from other similarly situated property owners along the bluff in Solana Beach that have received CDP’s to perform improvements similar in scope to the improvements proposed by the Harris’. For example, since the certification of the City of Solana Beach’s LUP, the CCC has approved several CDP’s for similar projects along the bluff, including an extensive remodel of an existing non-conforming home owned by WJK Trust at 355 Pacific Avenue that is located within 10 feet of the bluff edge (CDP No. 6-14-0679), Importantly, the WJK Trust CDP authorized an extensive remodel including a 750 square foot addition, an after the fact permit for the removal of existing sliding glass doors, which were replaced with different sliding glass doors that were installed on the western (seaward) wall of the existing structure. The type of doors and location (i.e., western wall) of the approved sliding glass doors at the WJK Trust property are strikingly similar to those proposed for the Harris residence. Importantly, the renovations that the Commission approved for the WJK Trust property were far more extensive, and much closer the to 50% threshold as provided by the certified LUP, than those proposed by the Harris’, summarized as follows:

	Harris (CDP No. 6-18-0182)	WJK Trust (CDP No. 6-14-0679)
Floor Area Alteration	20% alteration (with the exception of fireplace foundation removal, <u>no structural changes or increase</u> )	43% <u>increase</u>
Exterior Wall Alteration	30%	42%
Roof Structure Alteration	14%	49%

Staff’s suggestion that the Harris’ could continue to use their home without making the proposed improvements does not justify a denial of their CDP application. It also unreasonably restricts the Harris’ ability to update their home and make better use of the existing space, as their neighbors are permitted to do, and as the City of Solana Beach’s code and certified LUP allows. Staff’s suggestion that the Harris’ could move their home landward is similarly unfair and not at all realistic. Importantly, due to constraints imposed by the shallow lot depth (i.e., 60-80 feet from the bluff edge to the inland property boundary), it is not feasible for the Harris’ to simply redevelop the site and construct a new home with a significantly larger setback from the bluff edge. No new home could reasonably be constructed on this lot with the setbacks required by Staff’s calculations. As Staff requires that all new development be setback from the 75-year GSL, even based on Geotechnical Exploration Inc.’s analysis, a new home on the Harris’

Chair Dayna Bochco and Commissioners  
RE: CDP Application No. 6-18-0182 (Harris)  
October 4, 2018

property would need to be located at least 56 feet from the bluff edge, leaving only 4 to 24 feet between the bluff edge setback line and the inland boundary of the property (i.e., the street) to construct a home. Moreover, assuming Staff's calculations of the 75-year GSL would apply, no new development would ever be permitted on the Harris' property. According to Staff, the 75-year GSL is located 86.5 feet from the bluff edge – *up to 26.5 feet landward of the inland boundary of the lot, in the middle of Pacific Street.* (See Exhibit 3 to Staff Report.)

On behalf of our clients, and in the interest of fairness, we urge the Chair and Commissioners to reject Staff's recommendation to deny the Harris' application for a CDP to perform the extremely modest improvements to their existing legal non-conforming home, and instead approve the CDP, finding that the project is in compliance with all applicable Solana Beach codes and the Coastal Act. We appreciate your time and consideration of this application.

Very Truly Yours,

THE JON CORN LAW FIRM



Arie L. Spangler

Encl.:

- Exhibit "A", February 14, 2018 Staff Report for City of Solana Beach and attachments;
- Exhibit "B", October 3, 2018 email correspondence from J. Dyjak to E. Stevens, ref. site plan error

cc: Scott and Lisa Harris  
Jim Dyjak  
Jay K. Heiser, GEI  
Eric Stevens