

## **CALIFORNIA COASTAL COMMISSION**

CENTRAL COAST DISTRICT  
725 FRONT STREET, SUITE 300  
SANTA CRUZ, CA 95060  
PHONE: (831) 427-4863  
FAX: (831) 427-4877  
WEB: WWW.COASTAL.CA.GOV



# F11c

### **A-3-PSB-21-0074 (HYMAN AND OKERBLOM SEAWALL) DECEMBER 17, 2021 HEARING EXHIBITS**

#### **Table of Contents**

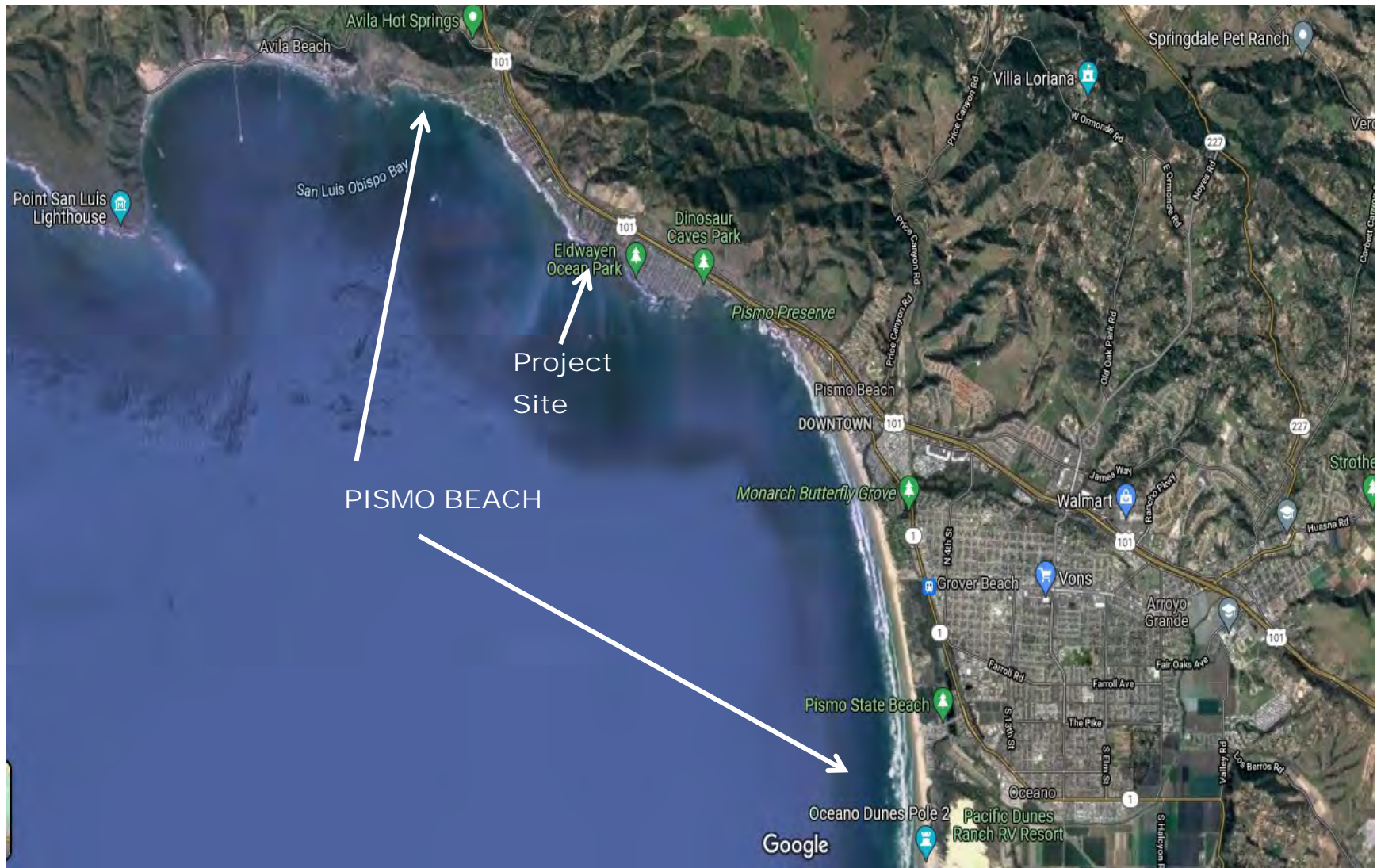
**Exhibit 1: Location Maps**

**Exhibit 2: Site Photo**

**Exhibit 3: California Coastal Records Project Photos of Site from 1972 to 2019**

**Exhibit 4: City's Final Local CDP Action Notice and Approved Project Plans**

**Exhibit 5: Appeal of City's CDP Decision**



# Regional Location Map





# Project Location





Source: California Coastal Records Project photo #201902537

# Site Photo





Source: California Coastal Records Project photo #7227062

# Time Comparison Photos



# Time Comparison Photos





# Time Comparison Photos





Source: California Coastal Records Project photo #8910126

# Time Comparison Photos





# Time Comparison Photos





# Time Comparison Photos





Source: California Coastal Records Project photo #201902537

# Time Comparison Photos



**CITY OF PISMO BEACH**  
**Community Development Department**  
760 Mattie Road, Pismo Beach, California 93449  
(805) 773-4658 / Fax (805) 773-4684

October 19, 2021

Sent Via Email: [Katie.Butler@coastal.ca.gov](mailto:Katie.Butler@coastal.ca.gov) and USPS – Certified

California Coastal Commission  
725 Front Street, Suite 300  
Santa Cruz, CA 95060

**RECEIVED**

**OCT 29 2021**

ATTN: Katie Butler, Coastal Planner

CALIFORNIA  
COASTAL COMMISSION  
CENTRAL COAST AREA

**FINAL LOCAL  
ACTION NOTICE**

REFERENCE # 3-PSB-21-0979

APPEAL PERIOD 11/1/21-11/15/21

**Notice of Final Action**  
**by the City of Pismo Beach Community Development Department**  
**on a Project located within the Pismo Beach Coastal Zone**

OWNERS/  
APPLICANTS

Tony Hyman, John Okerblom  
2141 Shoreline Drive, 2151 Shoreline Drive, Pismo Beach, CA 93449  
Tel: 805-773-6777 (Hyman) / Email: [thyman@charter.net](mailto:thyman@charter.net)  
Tel: 805-295-6435 (Okerblom) / Email: [okerjohn@gmail.com](mailto:okerjohn@gmail.com)

REPRESENTATIVE

Rachel Kovesdi, Kovesdi Consulting  
3940-7 Broad Street, #139  
San Luis Obispo, CA 93401  
Tel: 805-471-2948 / Email: [rachel@kovesdiconsulting.com](mailto:rachel@kovesdiconsulting.com)

DESCRIPTION

Site Address: 2141 and 2151 Shoreline Drive, Pismo Beach, CA 93449  
Project Summary: Coastal Development Permit for the construction of a new carved and colored shotcrete tied-back bluff wall, installation of 27 drilled tiebacks (P20-000056), and adopting a Mitigated Negative Declaration. Location – 2141 and 2151 Shoreline Drive; the project is located in the Coastal Zone and is appealable to the California Coastal Commission. APN: 010-521-018 and 010-521-019.

DATE OF ACTION: 09/18/2021

ACTION: Approved

ATTACHMENTS:

- 1) Resolution No. PC-R-2021-017
- 2) Staff Report & Powerpoint Presentation
- 3) Approved Project Plans
- 4) Legal AD/ Notice of Public Hearing

APPEAL STATUS: Appealable

NOTE: Appealable to the California Coastal Commission pursuant to Coastal Act Section 30503. An aggrieved person may appeal this decision to the Coastal Commission within ten working days following Coastal Commission receipt of this notice. Any appeal of this action must be filed in writing to the Coastal Commission using forms obtainable from the Santa Cruz district office at the address identified above.



**RESOLUTION NO. PC-R-2021-017**

**A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF PISMO BEACH, CALIFORNIA, APPROVING PROJECT P20-000056 FOR A COASTAL DEVELOPMENT PERMIT FOR THE CONSTRUCTION OF A NEW CARVED AND COLORED SHOTCRETE TIED-BACK BLUFF WALL AND INSTALLATION OF 27 DRILLED TIEBACKS AND ADOPTING A MITIGATED NEGATIVE DECLARATION  
APNS 010-521-018 AND 010-521-019**

---

**WHEREAS**, John P. Okerblom and Tony Hyman ("Applicants") have submitted an application for a Coastal Development Permit for the construction of a new carved and colored shotcrete tie-back bluff wall and installation of 27 drilled tie-backs at 2141 and 2151 Shoreline Drive; and

**WHEREAS**, the Planning Commission held a duly-noticed public hearing on September 28, 2021, at which all interested persons were given the opportunity to be heard; and

**WHEREAS**, the Planning Commission determined that under the provisions of the California Environmental Quality Act (CEQA), this project qualifies for review and adoption of a Mitigated Negative Declaration; and

**WHEREAS**, the Planning Commission finds, after due study, deliberation, and public hearing that the following circumstances exist:

**A. FINDINGS REQUIRED BY THE CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA):**

1. The project consists of a new carved and colored shotcrete tied-back bluff wall and installation of 27 drilled tiebacks to protect existing residences and qualifies for the review and adoption of a Mitigated Negative Declaration pursuant to the California Environmental Quality Act (CEQA).
2. There are no site constraints that have otherwise not been addressed within the Initial Study/Mitigated Negative Declaration. The project could have a significant effect on the environment; however, there will not be any significant effect in this case because mitigation measures to address Air Quality, Geology and Soils, and Greenhouse Gas, as described in the Mitigated Negative Declaration have been added to reduce any impacts to less than significant.
3. That the Mitigation and Monitoring program attached to the Mitigated Negative Declaration, has been reviewed and determined to be adequate in mitigating or avoiding potentially significant environmental effects.
4. The public hearing and issuance of the Mitigated Negative Declaration for this project has been adequately noticed and advertised, to the provisions of Sections

15072, 15073, and 15074 of the CEQA guidelines and California Government Code Sections 65090, 65091, and 65095.

5. The proposed bluff wall is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations because the project is in the low-density residential land use category within the Single-Family Residential (R-1) zoning designation and will protect the existing and allowed single-family residences and their related improvements.
6. The proposed development occurs within city limits on a project site of no more than five acres and is surrounded by similar and comparable uses and similar bluff improvements exist in the immediate neighborhood.
7. The project site has no value as habitat for endangered, rare or threatened species because the sites are currently developed with existing single-family residences and related improvements.
8. Approval of the project would not result in any significant effects relating to traffic, noise, air quality or water quality because the project, as conditioned, is consistent with all applicable zoning code and California building code standards.
9. The site is and can be adequately served by all required utilities and public services.

**B. FINDINGS FOR APPROVAL OF THE COASTAL DEVELOPMENT PERMIT:**

1. The project improvements comply with the public access and public recreation policies of Chapter 3 (commencing with Section 30220) of the California Coastal Act of 1976.
2. The construction of a new carved and colored shotcrete tied-back bluff wall and installation of 27 drilled tiebacks is appropriate in size to protect the existing residences at 2141 and 2151 Shoreline Drive; these residences and the proposed improvements are compatible with the adjacent residences and similar structures on other properties in the near vicinity.
3. The architectural and general appearance of the new carved and colored shotcrete tied-back bluff wall is in keeping with the character of the neighborhood as the improvements have been designed to blend with the color and texture of the surrounding bluff face.
4. The proposed development is consistent with the General Plan, Local Coastal Plan and General Plan Land Use Plan category of 'Low Density Residential'.



5. The proposed development is compatible with the nearby existing uses and not detrimental to the health, safety, morals, comfort, and general welfare of persons living or working in the surrounding area of the proposed project because the proposed use includes the development of a bluff wall to protect existing single-family residences, where other single-family residences and similar bluff improvements exist in the immediate neighborhood.
6. The proposed development will not be detrimental to the orderly development of improvements in the surrounding area and will not be detrimental to the orderly and harmonious development of the city because the proposed project will protect the existing residences from accelerated erosion and undermining.
7. The proposed development will not impair the desirability of investment or occupation in the neighborhood because the proposed use is similar to other development in the immediate neighborhood and maintains a similar scale and character to other development in the same Single Family Residential zone.
8. The proposed project will not significantly alter existing natural landforms because the project is designed to include colors and materials to blend with the existing bluff face; and
9. The scale of the proposed development is compatible with the adjacent area and with the surrounding views and other Local Coastal Program Land Use Plan considerations as designed.

**NOW, THEREFORE, BE IT RESOLVED** that the Planning Commission of the City of Pismo Beach hereby approves Permit No. P20-000056 and adopts the Mitigated Negative Declaration, with the above findings and subject to the conditions as set forth in Exhibit A, attached hereto and incorporated herein by this reference.

**UPON MOTION** of Commissioner Malone Prichard, seconded by Commissioner Van-Rozeboom, the foregoing Resolution is hereby approved and adopted the 28th day of September, 2021, by the following roll call vote, to wit:

<b>AYES:</b>	<b>5</b>	<b>Malone Prichard, Van Rozeboom, Jones, Werner, Inman</b>
<b>NOES:</b>	<b>0</b>	
<b>ABSENT:</b>	<b>0</b>	
<b>ABSTAIN:</b>	<b>0</b>	
<b>RECUSED:</b>	<b>0</b>	

**Approved:**



**Stacy L. Inman**  
**Chair**

**Attest:**

  
**Elsa Perez, CMC**  
**Planning Commission Secretary**

## **EXHIBIT A**

**CITY OF PISMO BEACH CONDITIONS  
PLANNING COMMISSION MEETING OF SEPTEMBER 28, 2021  
PERMIT NO. P20-000056, CDP / MND  
LOCATION: 2141 AND 2151 SHORELINE DRIVE,  
APNS: 010-521-018 AND 010-521-019**

The conditions set forth in this permit affect the title and possession of the real property that is the subject of this permit and shall run with the real property or any portion thereof. All the terms, covenants, conditions, and restrictions herein imposed shall be binding upon and inure to the benefit of the owner and applicant, his or her heirs, administrators, executors, successors and assigns. Upon any sale, division or lease of real property, all the conditions of this permit shall apply separately to each portion of the real property and the owner (applicant, developer) and/or possessor of any such portion shall succeed to and be bound by the obligations imposed on owner (applicant, developer) by this permit.

**AUTHORIZATION:** Subject to the conditions stated below, approval of Permit P20-000056 grants planning permits to construct a new carved and colored shotcrete tied-back bluff wall and installation of 27 drilled tiebacks as shown on the approved plans with City of Pismo Beach stamp of September 28, 2021. Approval is granted only for the construction and use as herein stated; any proposed changes shall require approval of amendments to these permits by the City of Pismo Beach.

**EFFECTIVE DATE:** This permit shall become effective upon the passage of 20 days following the receipt of notice of this action by the California Coastal Commission, provided that an appeal has not been filed to the City Council within 10 working days or that an appeal has not been filed to the California Coastal Commission within the above 20 days. The filing of an appeal shall stay the effective date until an action is taken on the appeal.

**EXPIRATION DATE:** The applicant is granted two years for inauguration (i.e. building permits issued and construction begun) of this permit. The permits will expire on September 28, 2023, unless inaugurated prior to that date. Time extensions are permitted pursuant to Zoning Code Section 17.121.160 (2).

**ACCEPTANCE OF PERMIT AND CONDITIONS:** The property owner and the applicant (if different) shall sign these Conditions within ten (10) working days of receipt; the permit is not valid until signed by the property owner and applicant.

**COMPLIANCE AGREEMENT:** I have read and understood, and I will comply with all applicable requirements of any law or agency of the State, City of Pismo Beach and any other governmental entity at the time of construction. The duty of inquiry as to such requirements shall be my responsibility. I agree to defend, indemnify, and hold harmless the City, its agents, officers, and employees, from any claim, action, or proceeding against the City as a result of the action or inaction by the City, or from any claim to attack, set



aside, void, or annul this approval by the City of the project; or my failure to comply with conditions of approval. This agreement shall be binding on all successors and assigns.

**I HAVE READ AND UNDERSTOOD, AND I WILL COMPLY WITH ALL ATTACHED STATED CONDITIONS OF THIS PERMIT**

Approved by the Planning Commission on September 28, 2021.

\_\_\_\_\_  
Owner/Applicant

\_\_\_\_\_  
Date

\_\_\_\_\_  
Owner/Applicant

\_\_\_\_\_  
Date

**CONDITIONS, POLICIES, AND SELECTED CODE REQUIREMENTS FOR  
PROJECT NO. P20-000056  
2141 and 2151 SHORELINE DRIVE, APNS: 010-521-018 and 010-521-019**

Conditions as indicated below have been deemed to be of a substantive nature on the basis of the Planning Commission's decision. These conditions cannot be altered without Planning Commission approval.

**A. MITIGATION MEASURES TO BE MET PRIOR TO THE ISSUANCE OF BUILDING PERMITS:**

Prior to obtaining a building permit the project plans shall clearly indicate the following requirements and indicate how the project will comply with these requirements. In addition, during construction the project shall comply with the following mitigation measures:

**3A. Dust Control Measures**

Construction activities can generate fugitive dust, which could be a nuisance to local residents and businesses in close proximity to the proposed construction site.

**Projects with grading areas that are greater than 4-acres or are within 1,000 feet of any sensitive receptor shall implement the following mitigation measures to manage fugitive dust emissions such that they do not exceed the APCD's 20% opacity limit (APCD Rule 401) or prompt nuisance violations (APCD Rule 402):**

- a. Reduce the amount of the disturbed area where possible;
- b. Use of water trucks or sprinkler systems in sufficient quantities to prevent airborne dust from leaving the site and from exceeding the APCD's limit of 20% opacity for greater than 3 minutes in any 60 minute period. Increased watering frequency would be required whenever wind speeds exceed 15 mph.

Reclaimed (non-potable) water should be used whenever possible. **Please note that since water use is a concern due to drought conditions, the contractor or builder shall consider the use of an APCD-approved dust suppressant where feasible to reduce the amount of water used for dust control.** Please refer to the following link for potential dust suppressants to select from to mitigate dust emissions;  
<http://www.valleyair.org/busind/comply/PM10/Products%20Available%20for%20Controlling%20PM10%20Emissions.htm>

- c. All dirt stockpile areas should be sprayed daily and covered with tarps or other dust barriers as needed;
- d. Permanent dust control measures identified in the approved project revegetation and landscape plans should be implemented as soon as possible, following completion of any soil disturbing activities;
- e. Exposed ground areas that are planned to be reworked at dates greater than one month after initial grading should be sown with a fast germinating, non-invasive, grass seed and watered until vegetation is established;
- f. All disturbed soil areas not subject to revegetation should be stabilized using approved chemical soil binders, jute netting, or other methods approved in advance by the APCD;
- g. All roadways, driveways, sidewalks, etc. to be paved should be completed as soon as possible. In addition, building pads should be laid as soon as possible after grading unless seeding or soil binders are used;
- h. Vehicle speed for all construction vehicles shall not exceed 15 mph on any unpaved surface at the construction site;
- i. All trucks hauling dirt, sand, soil, or other loose materials are to be covered or should maintain at least two feet of freeboard (minimum vertical distance between top of load and top of trailer) in accordance with CVC Section 23114;
- j. "Track-Out" is defined as sand or soil that adheres to and/or agglomerates on the exterior surfaces of motor vehicles and/or equipment (including tires) that may then fall onto any highway or street as described in California Vehicle Code Section 23113 and California Water Code 13304. To prevent 'track out', designate access points and require all employees, subcontractors, and others to use them. Install and operate a 'track-out prevention device' where vehicles enter and exit unpaved roads onto paved streets. The 'track-out prevention device' can be any device or combination of devices that are effective at preventing track out, located at the point of intersection of an unpaved area and a paved road. Rumble strips or steel plate devices need periodic cleaning to be effective. If paved roadways accumulate tracked out soils, the track-out prevention device may need to be modified;
- k. Sweep streets at the end of each day if visible soil material is carried onto adjacent paved roads. Water sweepers shall be used with reclaimed water should be used where feasible. Roads shall be pre-wetted prior to sweeping when feasible;
- l. All PM<sub>10</sub> mitigation measures required should be shown on grading and building plans; and,



- m. The contractor or builder shall designate a person or persons whose responsibility is to ensure any fugitive dust emissions do not result in a nuisance and to enhance the implementation of the mitigation measures as necessary to minimize dust complaints and reduce visible emissions below the APCD's limit of 20% opacity for greater than 3 minutes in any 60-minute period. Their duties shall include holidays and weekend periods when work may not be in progress (for example, wind-blown dust could be generated on an open dirt lot). The name and telephone number of such persons shall be provided to the APCD Compliance Division prior to the start of any grading, earthwork or demolition (Contact Tim Fuhs at (805) 781-5912).

**Mitigation Implementation/Monitoring**

1. **Performance standard:** Dust mitigation plans shall be reviewed by the Planning Division.
2. **Contingency Measure:** None
3. **Implementation Responsibility:** Applicant
4. **Implementation Schedule:** Prior to submitting building plans, the above measures shall be clearly printed on all plans. Measures to be implemented throughout construction.
5. **Monitoring Method:** Once, upon completion of construction, by Engineering and Planning Divisions

**3B. Construction Permit Requirements**

Based on the information provided, we are unsure of the types of equipment that may be present during the project's construction phase. Portable equipment, 50 horsepower (hp) or greater, used during construction activities may require California statewide portable equipment registration (issued by the California Air Resources Board) or an APCD permit.

The following list is provided as a guide to equipment and operations that may have permitting requirements, but should not be viewed as exclusive. For a more detailed listing, refer to the Technical Appendices, page 4-4, in the APCD's 2012 CEQA Handbook.

- Power screens, conveyors, diesel engines, and/or crushers;
- Portable generators and equipment with engines that are 50 hp or greater;
- Electrical generation plants or the use of standby generator;
- Internal combustion engines;
- Rock and pavement crushing;
- Unconfined abrasive blasting operations;
- Tub grinders;
- Trommel screens; and,
- Portable plants (e.g. aggregate plant, asphalt batch plant, concrete batch plant, etc).

To minimize potential delays, prior to the start of the project, please contact the APCD Engineering & Compliance Division at (805) 781-5912 for specific information regarding permitting requirements.

**Mitigation Implementation/Monitoring**

1. **Performance standard:** The applicant shall ensure compliance with the APCD permitting requirements for construction equipment.
2. **Contingency Measure:** As determined by the environmental monitor or by the Building Official.
3. **Implementation Responsibility:** Applicant
4. **Implementation Schedule:** Measures to be implemented throughout construction.
5. **Monitoring Method:** Applicant shall consult with and apply for permits through the San Luis Obispo County Air Pollution Control District.

**3C. Construction Phase Idling Limitations**

This project is in close proximity to nearby sensitive receptors. Projects that will have diesel powered construction activity in close proximity to any sensitive receptor shall implement the following mitigation measures to ensure that public health benefits are realized by reducing toxic risk from diesel emissions:

To help reduce sensitive receptor emissions impact of diesel vehicles and equipment used to construct the project, the applicant shall implement the following idling control techniques:

1. California Diesel Idling Regulations
  - a. **On-road diesel vehicles** shall comply with Section 2485 of Title 13 of the California Code of Regulations. This regulation limits idling from diesel-fueled commercial motor vehicles with gross vehicular weight ratings of more than 10,000 pounds and licensed for operation on highways. It applies to California and non-California based vehicles. In general, the regulation specifies that drivers of said vehicles:
    1. Shall not idle the vehicle's primary diesel engine for greater than 5 minutes at any location, except as noted in Subsection (d) of the regulation; and,
    2. Shall not operate a diesel-fueled auxiliary power system (APS) to power a heater, air conditioner, or any ancillary equipment on that vehicle during sleeping or resting in a sleeper berth for greater than 5.0 minutes at any location when within 100 feet of a restricted area, except as noted in Subsection (d) of the regulation.
  - b. **Off-road diesel equipment** shall comply with the 5-minute idling restriction identified in Section 2449(d)(2) of the California Air Resources Board's In-Use Off-Road Diesel regulation.
  - c. Signs must be posted in the designated queuing areas and job sites to remind drivers and operators of the state's 5-minute idling limit.



- d. The specific requirements and exceptions in the regulations can be reviewed at the following web sites: [www.arb.ca.gov/msprog/truck-idling/2485.pdf](http://www.arb.ca.gov/msprog/truck-idling/2485.pdf) and [www.arb.ca.gov/regact/2007/ordiesl07/frooal.pdf](http://www.arb.ca.gov/regact/2007/ordiesl07/frooal.pdf).

**AND/OR**

2. Diesel Idling Restrictions Near Sensitive Receptors (List sensitive receptors here based on the following list: schools, residential dwellings, parks, day care centers, nursing homes, and hospitals – if none, then eliminate “b”)  
In addition to the state required diesel idling requirements, the project applicant shall comply with these more restrictive requirements to minimize impacts to nearby sensitive receptors:
- a. Staging and queuing areas shall not be located within 1,000 feet of sensitive receptors;
  - b. Diesel idling within 1,000 feet of sensitive receptors shall not be permitted;
  - c. Use of alternative fueled equipment is recommended; and
  - d. Signs that specify the no idling areas must be posted and enforced at the site.

**Mitigation Implementation/Monitoring**

1. **Performance standard:** Idling of equipment to be monitored by construction manager and verified by Planning and Building Division Staff.
2. **Contingency Measure:** As determined by the environmental monitor or by the Building Official.
3. **Implementation Responsibility:** Applicant
4. **Implementation Schedule:** Prior to construction, measures shall be printed on project plans. Measures to be implemented throughout construction.
5. **Monitoring Method:** Throughout construction by the Planning and Building Divisions.

**6A. Geotechnical Basis of Design**

The recommendations of the February 25, 2021 Geotechnical Basis of Design shall be incorporated into the project plans, including but not limited to measures required for site preparation, grading, wall preparation, surface improvements, drainage around improvements, and measures associated with observation and testing.

**Mitigation Implementation/Monitoring**

1. **Performance standard:** Plans shall be reviewed by the Planning and Building and Engineering Divisions to ensure compliance with the recommendations of the report.
2. **Contingency Measure:** As determined by the Building Official.
3. **Implementation Responsibility:** Applicant
4. **Implementation Schedule:** Measures to be implemented prior to issuance of a Building Permit.
5. **Monitoring Method:** Plans to be reviewed for compliance prior to issuance of Building Permits.

## **B. CONDITIONS TO BE MET PRIOR TO THE ISSUANCE OF A BUILDING PERMIT:**

### **BUILDING DIVISION**

1. All construction shall conform to the edition of the applicable California Building Code (CBC) or California Residential Code (CRC), the California Plumbing Code, the California Mechanical Code, the California Electrical Code, the California Energy Code, and the California Green Building Standards Code, including City of Pismo Beach amendments, in effect when an application for a construction permit is submitted to the Building Division.
2. An application for a Building Permit remains valid for 365 days after the date of filing. If a permit is not issued by this date, the application shall expire. In order to renew action on an application after expiration, the applicant must confirm that Planning approvals remain valid and then submit a new application, plans and documentation and pay a new plan review fee.
3. All required documents essential to the design of the project shall be submitted with the construction permit application. No deferred submittals, such as truss details, fire sprinkler plans, metal fabrication drawings, etc., are allowed.
4. All conditions of the Planning Permit, such as required lot mergers, a required subdivision map, public improvement design documents, mitigation measures and any other requirement of the City shall be completely satisfied prior to Building Permit issuance for the project. No building permits for a part of the overall project will be considered, such as early grading, foundation only, partial demolition, etc.

### **PLANNING DIVISION**

5. COMPLIANCE WITH PLANNING COMMISSION APPROVAL. Prior to the issuance of a Building Permit, the Project Planner shall confirm that the construction plot plan and wall elevations are in compliance with the Planning Commission's approval and these conditions.
6. COLOR AND TEXTURED CONCRETE WALLS. The applicant shall design all concrete wall improvements such that they are colored and textured to blend with the existing bluff face.
7. SAND REPLENISHMENT SUPPLY FEE. The applicant shall provide a sand supply fee study noting the cubic yards of soil materials to be displaced by the project and cost estimates of that replacement. A fee using the average of those estimates, with a minimum of three estimates, shall be paid to the Building Division prior to the issuance of a Building Permit.



## ENGINEERING DIVISION

### General Improvement Requirements which shall be met prior to issuance of permit:

8. Engineering standard conditions (notes): Shall be placed on the plans at time of submittal. A copy may be obtained through the Engineering Department.
9. Project improvements shall be designed and constructed in accordance with City standards and specifications and in accordance with all applicable City Ordinances. The decision of the City Engineer shall be final regarding the specific standards that shall apply.
10. Appropriate City standards shall be referred to on the plans and shall be included on a detail sheet within the plan set.
11. Encroachment Permits are required prior to any/all work in the public right of way. City Streets are to remain open to through traffic at all times. A traffic control plan shall be submitted to the Engineering Division for approval prior to detours or rerouting of traffic. Excavation within the streets shall be covered or backfilled and paved prior to the end of work each day. No temporary or long term parking, storage, or disposal of construction equipment or materials within the right-of-way shall occur without prior issuance of an encroachment permit.
12. The applicant shall provide a current title report to the Engineering Division.
13. The Owner and/or owner's contractor are to take precaution against damaging road surfaces. Note: The existing street sections adjacent the property may be substandard and may be subject to damage by heavy loading/equipment during construction. The owner is responsible for protection against and/or repair of, at owner's expense, any/all damage incurred during and/or due to construction.
14. Erosion and Drainage control features are to be available to be placed in the event of rain or other erosive action to prevent any sediment or refuse from leaving the site. Erosion control devices shall be installed and in place following daily construction activities. The applicant shall notify the Engineering Division of any changes in construction which will require additional erosion control measures. No Building Permits will be issued without prior approval of the Engineering Division and an approved erosion and sediment control plan and construction schedule. Erosion control measures shall be in place and approved by the Engineering Division prior to the start of construction.
15. A Water Pollution Control Plan (WPCP) shall be submitted.
16. All drainage shall be pumped and discharged to the street. Only overflow drainage shall be discharged toward the bluff.

**C. CONDITIONS TO BE MET DURING CONSTRUCTION:**

**BUILDING DIVISION**

1. **SITE MAINTENANCE.** During construction, the site shall be maintained so as to not infringe on neighboring property, such as debris and dust.

**PLANNING DIVISION**

2. **ARCHAEOLOGICAL MATERIALS.** In the event unforeseen archaeological resources are unearthed during any construction activities, all grading and or excavation shall cease in the immediate area and the find left untouched. The Building Official shall be notified so that the extent and location of discovered materials may be recorded by a qualified archaeologist, Native American, or paleontologist, whichever is appropriate. The qualified professional shall evaluate the find and make reservations related to the preservation or disposition of artifacts in accordance with applicable laws and ordinances. If discovered archaeological resources are found to include human remains, or in any other case when human remains are discovered during construction, the Building Official shall notify to county coroner. If human remains are found to be of ancient age and of archaeological and spiritual significance, the Building Official shall notify the Native American Heritage Commission. The developer shall be liable for costs associated with the professional investigation.
3. Certification of compliance with the soils report shall be submitted to the Building Division prior to foundation approvals. A final report certifying compliance with the soils report or grading plans shall be submitted to the Building Division prior to final approvals.

**D. CONDITIONS TO BE MET PRIOR TO FINAL INSPECTION.**

**BUILDING DIVISION**

1. Prior to Building Division final approval, all required inspections from the other various divisions must have been completed and verified by a city inspector.

**E. CONDITIONS SUBJECT TO ONGOING COMPLIANCE:**

1. **COMPLIANCE WITH APPLICABLE LAWS.** All applicable requirements of any law or agency of the State, City of Pismo Beach and any other governmental entity at the time of construction shall be met. The duty of inquiry as to such requirements shall be upon the applicant.
2. **HOLD HARMLESS.** The applicant, as a condition of approval, hereby agrees to defend, indemnify, and hold harmless the City, its agents, officers, and employees, from any claim, action, or proceeding against the City as a result of the action or



inaction by the City, or from any claim to attack, set aside, void, or annul this approval by the City of the applicant's project; or applicant's failure to comply with conditions of approval. This condition shall be binding on all successors and assigns.

3. The property owner and the applicant (if different) shall sign these Conditions of Approval within ten (10) working days of receipt; the permit is not valid until signed by the property owner and applicant.

**-END-**



## **PISMO BEACH PLANNING COMMISSION AGENDA REPORT**

**Agenda Item #7.B**

---

### **SUBJECT/TITLE:**

**COASTAL DEVELOPMENT PERMIT FOR THE CONSTRUCTION OF A NEW CARVED AND COLORED SHOTCRETE TIED-BACK BLUFF WALL, INSTALLATION OF 27 DRILLED TIEBACKS (P20-000056), AND ADOPTING A MITIGATED NEGATIVE DECLARATION. LOCATION – 2141 AND 2151 SHORELINE DRIVE; THE PROJECT IS LOCATED IN THE COASTAL ZONE AND IS APPEALABLE TO THE CALIFORNIA COASTAL COMMISSION. APNs 010-521-018 AND 010-521-019.**

---

### **RECOMMENDATION:**

Adopt a **Resolution** approving Project P20-000056 for a Coastal Development Permit for the construction of a new carved and colored shotcrete tied-back bluff wall and installation of 27 drilled tiebacks and adopting a Mitigated Negative Declaration.

---

### **BACKGROUND:**

The subject properties comprise an approximately 0.6-acre area across two lots, located at 2141 and 2151 Shoreline Drive within the Terrace Avenue Planning Area in the Single-Family Residential Zoning District (R-1, 1983 Code). The project site is also within and subject to the standards outlined in the Hazard Protection Overlay. Both properties are situated on a relatively flat marine terrace with a nearby vertical bluff.

A Coastal Development Permit was approved for the residence at 2151 Shoreline Drive in December 2009. The residence at 2141 Shoreline was built in 1938 when the property was under County of San Luis Obispo jurisdiction; however, a Coastal Development Permit was approved by the City on October 13, 1992, for repair and replacement of an existing seawall on the south bluff face of the property.

This project is necessary to protect the existing residence at 2151 Shoreline Drive and an existing seawall and residence at 2141 Shoreline Drive from accelerated bluff failure due to a combination of existing subsurface springs, unique geologic conditions, inadequate drainage caused by unforeseen site conditions in the rear yard, and focused wave energy. A vicinity map as well as photos of the project site and existing conditions are included with **Attachment 2**.

The proposed Coastal Development Permit will allow for the construction of a new carved and colored shotcrete tied-back bluff wall and installation of 27 drilled tiebacks. Improvements to support the project include a bluff wall face to match the color and texture of the existing bluff and drainage improvements to help dewater the bluff face. The subject property is within the Coastal Zone and is appealable to the Coastal Commission.

### **General Plan Elements**

The General Plan designates the subject property for residential land uses as part of the Terrace Avenue Planning Area (G). This neighborhood is an ocean oriented, low profile



residential neighborhood with a backdrop of the coastal foothills. Properties in this area are generally developed with low-density and medium-density residential uses as well as Shell Beach Elementary School. An evaluation of the pertinent General Plan policies for this property is included in **Attachment 3**.

### **1983 Zoning Code**

#### *Hazard Protection Overlay*

The project site is within and subject to the standards outlined in the Hazard Protection Overlay of the 1983 Zoning Code. In accordance with 17.078.060, the City may consider a seawall or similar protection device, subject to the following Hazards and Protection Overlay Code Section:

#### **17.078.060 Shoreline protection criteria and standards.**

D. Seawalls shall not be permitted, unless the city has determined that there are no other less environmentally damaging alternatives for protection of existing development or coastal dependent uses. If permitted, seawall design must (a) respect natural landforms; (b) provide for lateral beach access; and (c) use visually compatible colors and materials and will eliminate or mitigate any adverse impacts on local shoreline sand supply.

The City's Local Coastal Program, comprised of both the General Plan and the 1983 Zoning Ordinance, requires new residential development in the Terrace Avenue Planning Area to be set back a safe distance from the top of a coastal bluff to a 100-year setback plus an added factor of safety, with a minimum of 25' to be required. As part of the 2151 Shoreline's planning entitlements in 2009, a Geologic Coastal Bluff Evaluations were prepared by Geosolutions and Cleath and Associates. The report recommended a 38' bluff setback based on a 100-year retreat rate of 3.36 inches per year plus an additional 10-foot buffer. Building Permits were issued in the later part of 2010, grading and foundation construction occurred in 2011, and the final inspections granted in 2013. Due to the current site conditions versus what was originally approved, additional measures need to be taken to address the accelerated erosion of the bluff.

Terra Costa Consulting Group prepared a Geotechnical Basis of Design (February 2021) for the proposed bluff wall at 2151 Shoreline; as well as extending the wall onto a portion of the property at 2141 Shoreline (see **Attachment 4**). The report states "coastal bluff retreat rates are expressed in inches per year induced by marine erosion as the intersection of the shore platform at the base of bluff"; however, this project is subject to "subaerial erosion caused by both runoff and groundwater seepage" which is "a contributing factor to the increased bluff erosion observed at this site." Headcutting of the upper bluff due to this subaerial erosion when combined with marine erosion has increased the annual erosion rate from the 3.36 inches per year to an estimated 15 to 18 inches per year. Based on this increase in erosion rate, Terra Costa recommended the tied-back bluff wall design with drainage improvements as the most effective design alternative. In response to a request for additional information from the City, Terra Costa prepared a memo in April, 2021 (see **Attachment 5**) and estimated an approximate 13' loss of blufftop in a time period between 2009 and 2021. Terra Costa verified the rate of

retreat up to 18 inches per year, far in excess of the originally anticipated 3.36 inches per year. Should the recommended action of a new bluff wall not be implemented, significant erosion would create undermining of the residences at 2141 and 2151 Shoreline in a relatively short time period.

### **Environmental Review**

After completion of an initial study, it was determined that there is no substantial evidence the project may have a significant effect on the environment and the preparation of an Environmental Impact Report is not necessary. Therefore, a Mitigated Negative Declaration (**Attachment 6**; pursuant to Public Resources Code Section 21000 et seq., and CA code of Regulations Section 15000 et seq.) has been issued on August 26, 2021. Mitigation measures are proposed to address Air Quality, Geology and Soils, and Greenhouse Gas impacts, and are included as conditions of approval (**Attachment 1**). Mitigation Measures will be met during the construction phase of the project. The Mitigated Negative Declaration was distributed for comment to the State Clearinghouse, local agencies, and interested parties. The closing date for comments was September 24, 2021.

### **Public Notification**

A notice of public hearing was posted at City Hall, on the City's website, at the project site, mailed to all property owners within 300 feet of the project site, and published in the New Times on September 2, 2021. The meeting agenda and staff report were posted at City Hall and on the City's website in accordance with Government Code Section 54954.2. As of the writing of this report, no correspondence has been received.

### **Conclusion and Recommendation**

The project, as conditioned, meets the development standards in the 1983 Zoning Code and is necessary to protect against significant erosion and undermining of the residences at 2141 and 2151 Shoreline. It is recommended the Planning Commission adopt the prepared Resolution (**Attachment 1**) approving Project No. P20-000056 and adopting the Mitigated Negative Declaration.

---

### **FISCAL IMPACT:**

None.

---

### **ALTERNATIVES:**

1. Modify and adopt the prepared Resolution approving the project;
2. Do not adopt the prepared Resolution and direct staff to return with a new resolution and appropriate findings for denial of the project;
3. Provide direction to staff.

---

### **ATTACHMENTS:**

1. Resolution
2. Vicinity Map
3. Development Standards and Policies
4. Geotechnical Basis of Design, Terra Costa Consulting, February, 2021

5. Response to Request for Additional Information, April, 2021
6. Draft Mitigated Negative Declaration
7. Project Plans

---

**Prepared by:** Mike Gruver, Associate Planner, AICP

**Meeting Date:** September 28, 2021

**Reviewed by:** Megan Martin, Planning Manager

**Community Development Director Approval:** Matthew Downing, AICP



BLUFF STABILIZATION  
2151 & 2141 SHORELINE DRIVE  
SHELL BEACH, CALIFORNIA  
PERMIT APPLICATION NO. B20-XXXXX



VICINITY MAP  
NO SCALE

PROPERTY INFORMATION

APN 010-521-019 (CY PB TR 394 LT 19)  
2151 SHORELINE DRIVE, PISMO BEACH, CA 93449  
DR. JOHN P. OKERBLOM  
SINGLE FAMILY RESIDENCE  
WITHIN 1983 COASTAL ZONING AREA R-1

APN 010-521-018 (CY PB TR 394 LT 18)  
2141 SHORELINE DRIVE, PISMO BEACH, CA 93449  
TONY HYMAN (TRE ETAL)  
SINGLE FAMILY RESIDENCE  
WITHIN 1983 COASTAL ZONING AREA R-1

REFERENCE

FOR DESCRIPTION OF WORK SEE:  
GEOTECHNICAL BASIS OF DESIGN REPORT FOR  
2151 & 2141 SHORELINE DRIVE  
SHELL BEACH, CALIFORNIA 93449

PREPARED BY:  
DATED: 7-31-20  
PROJECT NO.: 3069-01

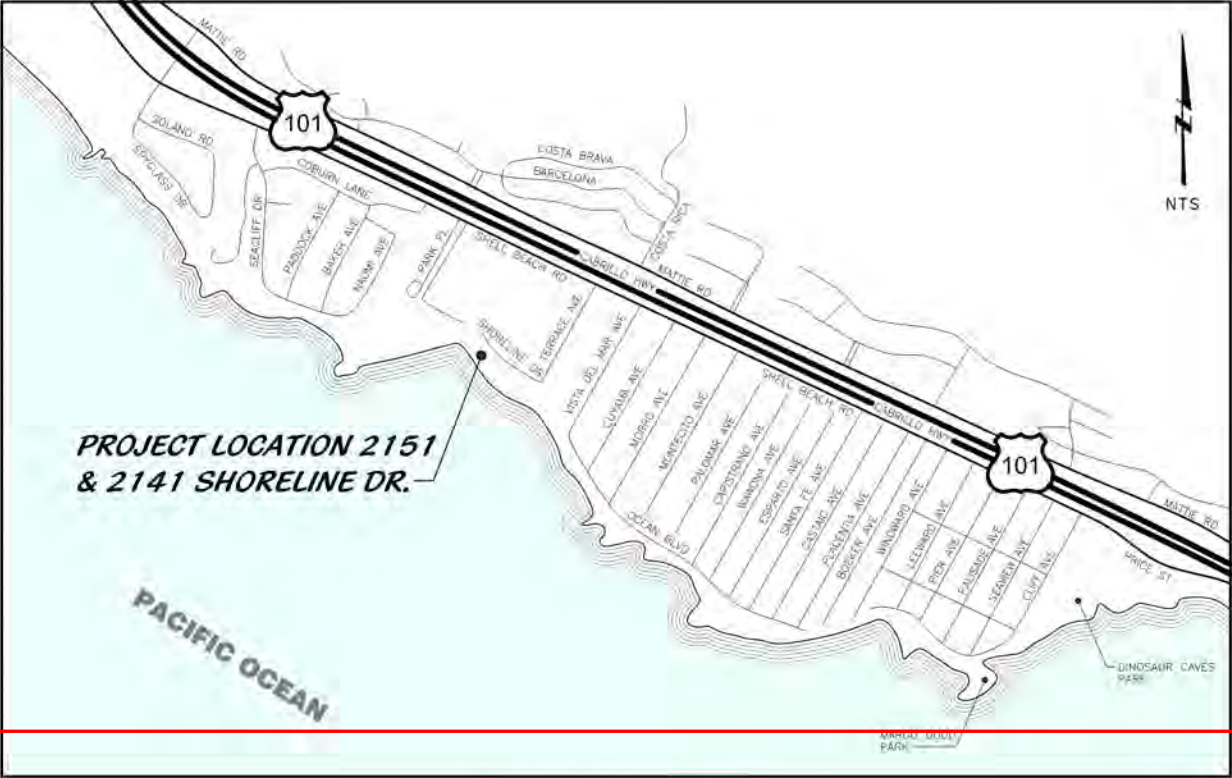
PROJECT SCOPE

DUE TO BLUFF EROSION ACCELERATED BY BOTH  
GROUNDWATER SEEPAGE AND WAVE ATTACK,  
THIS PROJECT PROPOSES THE CONSTRUCTION  
OF A CARVED AND COLORED TIED-BACK  
SHOTCRETE WALL AS SHOWN ON THESE PLANS.

PROJECT CONTACTS

PROJECT REPRESENTATIVE: RACHEL KOVESDI  
3940-7 BROAD STREET, #139  
SAN LUIS OBISPO, CA 93401  
(805) 471-2948  
RACHEL@KOVESDICONSULTING.COM

CIVIL/GEOTECHNICAL:  
TERRACOSTA CONSULTING GROUP, INC.  
ENGINEER OF RECORD:  
WALTER F. CRAMPTON  
PROJECT MANAGER:  
GENE SPINETO  
3890 MURPHY CANYON ROAD, SUITE 200  
SAN DIEGO, CA 92123  
(858) 573-6900  
WCRAMPTON@TERRACOSTACOM  
GSPINETO@TERRACOSTA.COM



LOCATION MAP  
NO SCALE

SHEET INDEX

- 1 TITLE, LOCATION MAP & PROJECT OVERVIEW
- 2 PROJECT NOTES
- 3 PROJECT NOTES & SPECIFICATIONS
- 4 PROJECT NOTES & SPECIFICATIONS
- 5 PROPOSED REPAIR SITE PLAN
- 6 PROPOSED ELEVATION
- 7 PROPOSED CROSS SECTION
- 8 TIEBACK DETAILS
- 9 TEMPORARY EROSION CONTROL

WORK TO BE DONE

THIS PROJECT SHALL COMPLY WITH THE 2016 EDITIONS OF THE CALIFORNIA BUILDING  
CODE (CBC) AND ALL AMENDMENTS TO THE CBC. CODES ADOPTED BY THE CITY OF  
PISMO BEACH AND ALL OTHER CODES, REGULATIONS AND APPROVALS ESTABLISHED  
BY THE CITY OF PISMO BEACH.



LUE DESIGNATION

TERRACE AVENUE PLANNING AREA G

TERRACOSTA CONSULTING GROUP  
ENGINEERS & GEOLOGISTS  
3890 MURPHY CANYON ROAD, SUITE 200  
SAN DIEGO, CA 92123 PHONE: (858) 573-6900  
WWW.TERRACOSTA.COM



BLUFF STABILIZATION - 2151 & 2141 SHORELINE DRIVE

TITLE, LOCATION MAP & PROJECT SCOPE

Exhibit 4  
A-3-PSB-21-0074  
Page 10 of 27







GEOLOGY & SOILS MITIGATION MEASURES

- 1. EROSION CONTROL MEASURES SHALL BE INCORPORATED INTO THIS PROJECT, INCLUDING BUT NOT LIMITED TO MEASURES REQUIRED FOR SITE PREPARATION, GRADING, WALL PREPARATION, SURFACE IMPROVEMENTS, DRAINAGE AROUND IMPROVEMENTS, AND INCLUDE MEASURES ASSOCIATED WITH OBSERVATION AND TESTING. AS SHOWN ON THESE DRAWINGS, EROSION CONTROL MEASURES MAY INCLUDE THE PLACEMENT OF SANDBAGS, FIBER ROLLS, AND/OR SEDIMENT FENCES ALONG THE LIMITS OF THE EDGE OF WORK AREAS TO PREVENT SEDIMENT, DEBRIS AND CONSTRUCTION WASTE FROM LEAVING THE WORK AREA.
- 2. POST EROSION AND SEDIMENT CONTROL MEASURES SHALL INCLUDE THE REESTABLISHMENT OF VEGETATION IN ALL CONSTRUCTION AREAS. THE REVEGETATION SHALL BE ACCOMPLISHED USING HYDROSEEDING AND MULCH OR AS SHOWN ON THESE PLANS, OR OTHER SURFACE TREATMENTS TO FACILITATE ESTABLISHMENT OF THE VEGETATION.
- 3. USE OF ONLY NATIVE PLANTS FROM THE COASTAL BLUFF SCRUB HABITAT DESCRIPTION IN THE HYDROSEED AND CONTAINER STOCK PALETTE SHALL BE UTILIZED FOR ANY VEGETATION COMPONENT OF THE PROJECT.

CORROSIVE BEACH ENVIRONMENT

CONTRACTOR, SUPPLIERS AND MANUFACTURERS SHALL BE MADE AWARE THAT THIS PROJECT IS LOCATED IN PROXIMITY TO A HIGHLY CORROSIVE BEACH ENVIRONMENT. AS SUCH, CONTRACTOR SHALL VERIFY THAT ALL SUBMITTED CONCRETE MIX DESIGNS, MATERIALS, STEEL AND STEEL COATINGS ARE ADEQUATE FOR USE IN THIS ENVIRONMENT.

GENERAL NOTES

- 1. OWNER AND OR OWNER'S CONTRACTOR SHALL PROTECT PUBLIC INFRASTRUCTURE FROM DAMAGE DURING CONSTRUCTION. NOTE: THE EXISTING STREET SECTIONS MAY BE SUBSTANDARD AND THE CONTRACTOR SHALL PROTECT THE PUBLIC INFRASTRUCTURE FROM DAMAGE BY HEAVY LOADING/EQUIPMENT DURING THE COURSE OF CONSTRUCTION. THE CONTRACTOR SHALL REPAIR, AT OWNER'S EXPENSE, ANY/ALL DAMAGE TO PUBLIC INFRASTRUCTURE INCURRED DURING AND/OR DUE TO CONSTRUCTION, TO THE SATISFACTION OF THE CITY ENGINEER.
- 2. WHERE DETERMINED NECESSARY BY THE CITY ENGINEER, DAMAGED PORTIONS OF THE EXISTING CURB, GUTTER AND SIDEWALK ALONG THE PROPERTY FRONTAGE SHALL BE REPLACED TO THE SATISFACTION OF THE CITY ENGINEER PRIOR TO FINAL APPROVAL.
- 3. ENCROACHMENT PERMIT(S) MUST BE OBTAINED PRIOR TO ANY/ALL WORK IN PUBLIC RIGHT-OF WAY.
- 4. CITY STREETS ARE TO REMAIN OPEN TO THROUGH TRAFFIC AT ALL TIMES. NO TEMPORARY OR LONG TERM PARKING OR STORAGE OF CONSTRUCTION EQUIPMENT OR MATERIALS SHALL OCCUR WITHOUT PRIOR ISSUANCE OF AN ENCROACHMENT PERMIT.
- 5. A TRAFFIC CONTROL PLAN IS REQUIRED FOR ANY DETOURS OR REROUTING OF TRAFFIC. DURING CONSTRUCTION, IT SHALL BE THE RESPONSIBILITY OF THE CONTRACTOR TO PROVIDE FOR SAFE TRAFFIC CONTROL IN AND AROUND THE SITE. THIS MAY INCLUDE BUT SHALL NOT BE LIMITED TO SIGNS, FLASHING LIGHTS, BARRICADES AND FLAG PERSONS AS DIRECTED BY THE BUILDING OFFICIAL OR THE CITY ENGINEER.
- 6. EXCAVATION WITHIN THE STREETS SHALL BE COVERED WITH TRAFFIC RATED STEEL PLATES OR BACKFILLED AND PAVED, TO THE SATISFACTION OF THE CITY ENGINEER, PRIOR TO THE END OF WORK EACH DAY.
- 7. EROSION AND DRAINAGE CONTROL FEATURES SHALL BE INSTALLED TO PREVENT SEDIMENT FROM LEAVING THE SITE. EROSION CONTROL DEVICES SHALL BE INSTALLED AND IN PLACE FOLLOWING DAILY CONSTRUCTION ACTIVITIES. THE APPLICANT SHALL NOTIFY THE ENGINEERING DIVISION OF ANY CHANGES IN CONSTRUCTION WHICH WILL REQUIRE ADDITIONAL EROSION CONTROL MEASURES OR OTHER CHANGES TO THE EROSION CONTROL PLAN.
- 8. WASTE MATERIALS SHALL NOT BE WASHED INTO THE STORM DRAIN SYSTEM. THIS INCLUDES BUT IS NOT LIMITED TO SOIL, PAINT, STUCCO, GROUT, COLOR COAT, CONCRETE DUST, SAW RESIDUES, GRINDINGS, OIL, ETC.
- 9. DURING THE CONSTRUCTION PERIOD, THE PROJECT FRONTAGE(S) SHALL BE SWEEPED DAILY AND KEPT FREE OF DIRT, DUST AND DEBRIS. AT THE CONCLUSION OF CONSTRUCTION, PRIOR TO THE ISSUANCE OF AN OCCUPANCY PERMIT, THE FRONTAGE(S) SHALL BE INSPECTED BY THE CITY ENGINEER AND REPAIRS COMPLETED AS DIRECTED TO THE SATISFACTION OF THE CITY ENGINEER.

SITE SAFETY

- 1. CONTRACTOR AGREES THAT HE SHALL ASSUME SOLE AND COMPLETE RESPONSIBILITY FOR SECURING THE JOB SITE AND JOB SITE CONDITIONS DURING THE COURSE OF CONSTRUCTION OF THIS PROJECT, INCLUDING SAFETY OF ALL PERSONS AND PROPERTY; THAT THIS REQUIREMENT SHALL APPLY CONTINUOUSLY AND NOT BE LIMITED TO NORMAL WORKING HOURS; AND THAT THE CONTRACTOR SHALL DEFEND, INDEMNIFY AND HOLD THE CITY OF PISMO BEACH, THE OWNER AND THE ENGINEER HARMLESS FROM ANY AND ALL LIABILITY, REAL OR ALLEGED, IN CONNECTION WITH THE PERFORMANCE OF WORK ON THIS PROJECT, EXCEPTING FOR LIABILITY ARISING FROM THE SOLE NEGLIGENCE OF THE OWNER OR THE ENGINEER.
- 2. THE CONTRACTOR SHALL OBTAIN AND HAVE AVAILABLE ON THE JOBSITE COPIES OF PERMITS, THE APPLICABLE STANDARDS SHOWN ON THESE PLANS, AND BE FAMILIAR WITH THEIR REQUIREMENTS.
- 3. ALL CONSTRUCTION SHALL CONFORM TO ALL LOCAL CODES, ORDINANCES, RESTRICTIONS AND OSHA REQUIREMENTS.
- 4. UPON COMPLETION OF EACH DAY'S WORK, THE CONTRACTOR SHALL BE RESPONSIBLE FOR LEAVING THE WORK AREA FREE OF HAZARDS, AND SHALL PROVIDE ALL NECESSARY TEMPORARY SIGNS, WARNING DEVICES, AND BARRICADES.
- 5. THE CONTRACTOR SHALL ALSO TAKE THE NECESSARY STEPS TO PROTECT THE PROJECT AND ADJACENT PROPERTY FROM ANY EROSION AND SILTATION THAT RESULT FROM HIS OPERATIONS BY APPROPRIATE MEANS (GRAVEL BAGS, HAY BALES, TEMPORARY DESILTING BASINS, DIKES, SHORING, ETC.) UNTIL SUCH TIME THAT THE PROJECT IS COMPLETED AND ACCEPTED FOR MAINTENANCE BY THE OWNER.

CONTRACTOR'S NOTES

- 1. ALL OPERATIONS CONDUCTED ON THE PREMISES, INCLUDING THE WARMING UP, REPAIR, ARRIVAL, DEPARTURE, OR RUNNING OF TRUCKS, EARTHMOVING EQUIPMENT, CONSTRUCTION EQUIPMENT, AND ANY OTHER ASSOCIATED EQUIPMENT SHALL BE LIMITED TO THE PERIOD BETWEEN 7:00 A.M. AND 5:00 P.M. EACH DAY, MONDAY THROUGH FRIDAY. NO OPERATIONS SHALL BE CONDUCTED ON THE PREMISES ON SATURDAYS, SUNDAYS, OR HOLIDAYS WITHOUT PRIOR APPROVAL FROM THE OWNER.
- 2. NOTWITHSTANDING THE MINIMUM STANDARDS SET FORTH IN THE MUNICIPAL CODE AND NOTWITHSTANDING THE APPROVAL OF THESE PLANS, THE CONTRACTOR IS RESPONSIBLE FOR THE PREVENTION OF DAMAGE TO ADJACENT PROPERTY. NO PERSON SHALL EXCAVATE ON LAND SO CLOSE TO THE PROPERTY LINE AS TO ENDANGER ANY ADJOINING PUBLIC STREET, SIDEWALK, ALLEY, FUNCTION OF ANY SEWAGE DISPOSAL SYSTEM, OR ANY OTHER PUBLIC OR PRIVATE PROPERTY WITHOUT SUPPORTING AND PROTECTING SUCH PROPERTY FROM SETTLING, CRACKING, EROSION, SILTING, SCOUR, OR OTHER DAMAGE WHICH MIGHT RESULT FROM THE IMPROVEMENTS DESCRIBED IN THESE PLANS. THE OWNER WILL HOLD THE CONTRACTOR RESPONSIBLE FOR CORRECTION OF IMPROVEMENTS WHICH DAMAGE ADJACENT PROPERTY.
- 3. ALL STONES, ROCKS, ROOTS, OR OTHER WASTE MATERIAL SHALL BE PROPERLY DISPOSED OF. OVERSIZE ROCK DISPOSAL SHALL BE DISCUSSED AND APPROVED BY THE CITY AND OWNER PRIOR TO COMMENCEMENT OF WORK. NO ROCKS SHALL BE NESTED OR PLACED IN ANY DRAINAGE COURSE OR ON THE BEACH WITHOUT PRIOR APPROVAL OF THE CITY ENGINEER. EXCESS ROCKS SHALL BE REMOVED TO AN APPROVED DISPOSAL SITE.
- 4. WHEN IMPORT OR EXPORT OF EARTH MATERIALS ARE REQUIRED, HAUL ROUTES TO AND FROM THE SITE AND THE DISPOSAL SITE SHALL BE APPROVED BY THE OWNER AND THE CITY ENGINEER.
- 5. NO BRUSHING OR CLEARING SHALL BE PERFORMED IN ANY AREA NOT SHOWN TO BE GRADED ON THE PLANS. OPEN SPACE EASEMENTS OR NATURAL AREAS SHALL BE STAKED DURING GRADING AND CONSTRUCTION ACTIVITIES TO INSURE THAT SUCH AREAS REMAIN UNDISTURBED. HEAVY EQUIPMENT SHALL NOT BE OPERATED IN AREAS THAT ARE TO REMAIN AS OPEN SPACE OR NATURAL WITH ONLY PRIOR WRITTEN APPROVAL OF THE CITY ENGINEER.
- 6. IT IS THE RESPONSIBILITY OF THE CONTRACTOR TO OBTAIN AN EXCAVATION PERMIT AND COMPLY WITH ALL PERMIT CONDITIONS FROM THE DIVISION OF INDUSTRIAL SAFETY AND TO ADHERE TO ALL PROVISIONS OF THE STATE CONSTRUCTION SAFETY ORDERS PRIOR TO COMMENCING EXCAVATION. PERMITS CAN BE OBTAINED FROM THE STATE OF CALIFORNIA, DEPARTMENT OF INDUSTRIAL RELATIONS, DIVISION OF OCCUPATIONAL SAFETY AND HEALTH AT WWW.DIR.CA.GOV
- 7. SANITARY FACILITIES SHALL BE MAINTAINED ON SITE.

GRADING NOTES

- 1. LOT GRADING SHALL MEET THE MINIMUM REQUIREMENTS OF THE LATEST CBC EDITION.
- 2. DRAINAGE SHALL BE CARRIED TO THE STREET OR OTHER IMPROVED DRAINAGE DEVICE VIA A NON-EROSIVE DRAINAGE DEVICE.
- 3. NO GRADING OR DRAINAGE IMPROVEMENTS WHICH ALTER EXISTING DRAINAGE COURSES OR CONCENTRATE DRAINAGE TO ADJACENT PROPERTIES SHALL BE ALLOWED WITHOUT PRIOR APPROVAL FROM THE CITY ENGINEER.
- 4. ALL GRADING AND CLEARING IS TO BE PERFORMED ONLY WITHIN THE AREAS SHOWN ON THE APPROVED PLANS, AND IN CONFORMANCE WITH SECTION 300 OF THE GREENBOOK STANDARD SPECIFICATIONS FOR PUBLIC WORKS CONSTRUCTION, CURRENT EDITION.
- 5. CLEARING, GRUBBING, AND PREPARING AREAS TO BE EXCAVATED AND TREES MARKED FOR REMOVAL, ABANDONED STRUCTURES, WEEDS, AND ANY OTHER RUBBISH SHALL BE REMOVED AND DISPOSED OF OFF-SITE SO AS TO LEAVE THE AREAS THAT HAVE BEEN DISTURBED WITH A NEAT AND FINISHED APPEARANCE, FREE FROM UNSIGHTLY DEBRIS.
- 6. TREES, BRUSH, GRASS, DEBRIS AND OTHER OBJECTIONABLE MATERIAL SHALL NOT BE INCORPORATED INTO OR USED AS FILL. ANY MATERIALS DESIGNATED AS UNSUITABLE BY THE SOILS ENGINEER SHALL BE SCREENED OR REMOVED PRIOR TO ANY FILL PLACEMENT.
- 7. TREE PRUNING AND OR TREE REMOVAL SHALL NOT OCCUR WITHOUT REVIEW AND APPROVAL BY THE PROJECT BIOLOGIST.
- 8. ALL FILL SOILS SHALL BE PROPERLY COMPACTED TO A MINIMUM 90% RELATIVE COMPACTION AS DETERMINED BY THE FOLLOWING COMBINATION OF ASTM STANDARDS: D1557, D1556, AND D2922. AREAS TO RECEIVE FILL SHALL BE PROPERLY PREPARED AND APPROVED BY THE ENGINEERING GEOLOGIST AND SOILS ENGINEER PRIOR TO THE PLACING OF FILL.
- 9. ALL FILLS SHALL BE ADEQUATELY BENCHED AND KEYED INTO COMPETENT MATERIAL. BENCHING AND KEYING SHALL BE IN CONFORMANCE WITH WITH SECTION 300 OF THE GREENBOOK STANDARD SPECIFICATIONS FOR PUBLIC WORKS CONSTRUCTION, CURRENT EDITION.

CONCRETE:

- 1. CONCRETE MIXES SHALL BE SUBMITTED TO THE ENGINEER OF RECORD FOR APPROVAL.
- 2. CONCRETE FOR THE PROPOSED TIEDBACK WALL SHALL HAVE A MINIMUM COMPRESSIVE STRENGTH AT 28 DAYS, f'c=5,000 PSI, AND HAVE A MAXIMUM WATER CEMENT RATIO OF 0.4 PER THE "GREENBOOK" FOR SEVERE EXPOSURE.
- 3. NORMAL WEIGHT CONCRETE SHALL BE 145 TO 155 POUNDS PER CUBIC FOOT.
- 4. CEMENT SHALL CONFORM TO ASTM C150, TYPE II CEMENT U.N.O. FINE AND COARSE AGGREGATE SHALL CONFORM TO ASTM C33. WHEN SPECIFIED, AIR-ENTRAINING ADMIXTURES SHALL COMPLY WITH ASTM C260. READY MIX CONCRETE SHALL BE MIXED AND DELIVERED IN ACCORDANCE WITH ASTM C94.
- 5. MAXIMUM SIZE OF COARSE AGGREGATE FOR SLABS SHALL BE 1 1/2" (1 1/2" IN THICK SLABS, WHEN U.N.O.) SAND SHALL BE CLEAN, HARD, DURABLE, WASHED, AND FREE FROM SILT, FINE, OR CLAY. MIXING WATER SHALL BE CLEAN AND FREE FROM INJURIOUS AMOUNTS OF OIL, ACIDS, ALKALIS, ORGANIC MATERIALS OR OTHER DELETERIOUS SUBSTANCES. CONCRETE MIX MAY CONTAIN A POLYMER-BASED WATER-REDUCING ADMIXTURE.
- 6. CALCULUM CHLORIDE SHALL NOT BE USED IN CONCRETE MIXES.
- 7. MIX DESIGNS FOR DIFFERENT WORK COMPONENTS SHALL NOT BE MIXED.
- 8. FORMWORK SHALL COMPLY WITH STANDARD PUBLICATION TAC-301 AND THE PROJECT SPECIFICATIONS. THE CONTRACTOR SHALL BE RESPONSIBLE FOR THE DESIGN, DETAILING, CARE, PLACEMENT, AND REMOVAL OF THE FORMWORK AND SHORES.

Approved  
City of Pismo Beach Planning Division  
by Planning Commission on 9/28/2021  
Resolution No. PC R 2021 017  
Planner: Michael Gruver Associate Planner



CITY OF PISMO BEACH, CALIFORNIA ENGINEERING AND PROJECT DEVELOPMENT DEPARTMENT				TERRACOSTA CONSULTING GROUP ENGINEERS & GEOLOGISTS 3890 MURPHY CANYON ROAD, SUITE 200 SAN DIEGO, CA 92123 PHONE: (858) 573-6900 WWW.TERRACOSTA.COM				BLUFF STABILIZATION - 2151 & 2141 SHORELINE DRIVE		SHEET NO: 3	
APPROVED BY:	BY:	DATE:	APPROVED BY:	PROJECT NOTES & SPECIFICATIONS							
				NOTE: THIS DRAWING IS REDUCED AND NOT TO SCALE IF SHEET SIZE IS SMALLER THAN 24" X 36"							



ADDITIONAL NOTES:

PERFORM CONSTRUCTION AND WORKMANSHIP IN COMPLIANCE WITH THE DRAWINGS, SPECIFICATIONS AND THE CURRENT EDITION OF THE CBC.

GENERAL NOTES AND TYPICAL DETAILS APPLY TO THE DRAWINGS UNLESS NOTED OR DETAILED OTHERWISE.

WHERE DISCREPANCIES BETWEEN GENERAL NOTES AND DRAWINGS OCCUR, DRAWINGS TAKE PRECEDENCE.

DRAWINGS INDICATE GENERAL AND TYPICAL DETAILS OF CONSTRUCTION. WHERE CONDITIONS ARE NOT SPECIFICALLY INDICATED BUT ARE OF SIMILAR CHARACTER TO DETAILS SHOWN, USE SIMILAR DETAILS OF CONSTRUCTION SUBJECT TO REVIEW BY ENGINEER.

THE CONTRACTOR SHALL SUPERVISE AND DIRECT THE WORK AND IS SOLELY RESPONSIBLE FOR ALL CONSTRUCTION MEANS, METHODS, TECHNIQUES, SEQUENCES AND PROCEDURES.

ALL CONDITIONS SHOWN OR NOTED AS EXISTING ARE BASED ON BEST INFORMATION CURRENTLY AVAILABLE AT THE TIME OF PREPARATION OF THESE DRAWINGS. CONTRACTOR SHALL FIELD VERIFY ALL UTILITIES, CONDITIONS AND IMMEDIATELY BRING TO THE ATTENTION OF THE ENGINEER, WHEN IT BECOMES APPARENT, ANY CONDITIONS THAT DIFFER FROM THE CONDITIONS SHOWN HEREIN. THE ENGINEER WILL THEN PREPARE ADDITIONAL DRAWINGS AS MAY BE NEEDED TO ACCOMMODATE THE CONDITIONS AS BROUGHT TO THEIR ATTENTION.

TEMPORARY & PERMANENT SAFETY RAILINGS

CONTRACTOR SHALL ENSURE THAT SAFETY RAILINGS AND WARNING SIGNS ARE IN-PLACE AT ALL TIMES THROUGHOUT THE DURATION OF CONSTRUCTION AND AT THE END OF EACH WORKING DAY TO MINIMIZE PUBLIC ACCESS TO THE AREA OF WORK.

ALL NEW GUARDRAILS SHALL COMPLY WITH GUARDRAIL & HANDRAIL PROVISIONS OF THE CURRENT CBC.

CONTRACTOR TO COORDINATE THE AESTHETICS OF A PERMANENT SAFETY RAILING THAT SHALL BE INSTALLED ALONG THE TOP OF THE WALL BEFORE PROJECT COMPLETION AND DEMOBILIZING FROM THE SITE.

SOILS-VERIFICATION / INSPECTION:

SPECIAL INSPECTION TYPE		CONTINUOUS	PERIODIC
1.	VERIFY MATERIALS BELOW SHALLOW FOUNDATIONS ARE ADEQUATE TO ACHIEVE THE DESIGN-BEARING CAPACITY.		X
2.	VERIFY EXCAVATIONS ARE EXTENDED TO PROPER DEPTH AND HAVE REACHED PROPER/COMPETENT MATERIAL.		X
3.	VERIFY 2' DEEP WALL VERTICAL KEY.		X
4.	VERIFY SOIL COMPACTION WHERE NECESSARY		X

STATEMENT OF SPECIAL INSPECTIONS

SPECIAL INSPECTION TYPE		CONTINUOUS	PERIODIC
1.	VERIFICATION OF SHOTCRETE & GROUT MIX DESIGNS		X
2.	INSPECTION OF REINFORCING STEEL		X
3.	VERIFICATION OF DEPTH OF TIEBACK	X	
4.	INSPECTION OF INSTALLATION & GROUTING OF TIEBACK	X	
5.	TESTING OF TIEBACK ANCHORS	X	
6.	STRUCTURAL SHOTCRETE APPLICATION (F'c = 5,000 PSI)	X	

STRUCTURAL OBSERVATION REQUIREMENTS

1. CONTINUOUS OBSERVATION SHALL BE PROVIDED DURING THE DRILLING, INSTALLATION AND TESTING OF ALL TIEBACKS.
2. AT THE CONCLUSION OF THE WORK INCLUDED IN THE PERMIT, THE STRUCTURAL OBSERVER SHALL SUBMIT TO THE BUILDING OFFICIAL A WRITTEN STATEMENT THAT THE SITE VISITS HAVE BEEN MADE AND IDENTIFY ANY REPORTED DEFICIENCIES THAT, TO THE BEST OF THE STRUCTURAL OBSERVER'S KNOWLEDGE, HAVE NOT BEEN RESOLVED.

PRE-CONSTRUCTION SPECIAL INSPECTION MEETING

PRIOR TO START OF CONSTRUCTION, THE CONTRACTOR SHALL SCHEDULE A PRE-CONSTRUCTION CONFERENCE WITH ALL PARTIES INVOLVED AT THE PROJECT SITE TO REVIEW THE SPECIAL INSPECTION REQUIREMENTS, PROCEDURES, AND INDIVIDUAL SPECIAL INSPECTORS THAT WILL BE ASSIGNED TO THE PROJECT, AS WELL AS REQUIREMENTS FOR STRUCTURAL OBSERVATION. CONTRACTOR SHALL CONTACT THE CITY OF PISMO BEACH BUILDING DIVISION TO CONFIRM AN ACCEPTABLE MEETING DATE AND TIME.

WORK TO BE DONE

THE IMPROVEMENTS CONSIST OF THE FOLLOWING WORK TO BE DONE ACCORDING TO THESE PLANS AND SPECIFICATIONS.

AS SHOWN ON SHEET 1, THIS PROJECT SHALL COMPLY WITH THE CURRENT EDITIONS OF THE CALIFORNIA BUILDING CODE (CBC) AND ALL AMENDMENTS TO THE CA CODES ADOPTED BY THE CITY OF PISMO BEACH, AND ALL OTHER CODES, REGULATIONS, AND APPROVALS ESTABLISHED BY THE CITY OF PISMO BEACH.

THE CONTRACTOR SHALL BE RESPONSIBLE TO ENSURE THAT ALL WORK IS COMPLETED IN ACCORDANCE WITH THESE PLANS IF THERE IS ANY QUESTIONS, THE CONTRACTOR SHALL REQUEST AN INTERPRETATION BEFORE DOING ANY WORK BY CONTACTING THE ENGINEER OF RECORD OR THE OWNER'S REPRESENTATIVE/PROJECT MANAGER.

UTILITY NOTE

UTILITIES HAVE BEEN SHOWN AS ACCURATELY AS POSSIBLE USING EXISTING RECORDS. CONTRACTOR SHALL BE RESPONSIBLE FOR VERIFYING ALL LOCATIONS AND DEPTHS OF ALL EXISTING UNDERGROUND AND OVERHEAD UTILITIES AS REQUIRED PRIOR TO THE START OF WORK.

THE CONTRACTOR SHALL TAKE ALL NECESSARY PRECAUTIONS TO LOCATE AND PROTECT ALL UNDERGROUND AND CONCEALED CONDUIT, PLUMBING OR OTHER UTILITIES WHERE NEW WORK IS BEING PERFORMED. BEFORE EXCAVATING, VERIFY LOCATION OF UNDERGROUND UTILITIES.

UNDERGROUND SERVICE ALERT (800) 224-4133

PISMO BEACH PUBLIC UTILITIES  
CHARTER COMMUNICATIONS 544-2688  
PACIFIC BELL (800) 312-3255  
PACIFIC GAS & ELECTRIC (800) 743-5000  
SOUTHERN CALIFORNIA GAS (800) 427-2200

EARTHWORK:

QUANTITIES SHOWN ARE APPROXIMATE. CONTRACTOR SHALL VERIFY QUANTITIES PRIOR TO BIDDING AND ADJUST AS NECESSARY. CONTRACTOR SHALL ALSO PROVIDE, AS PART OF BID PREPARATION, UNIT COSTS FOR MATERIALS AND LABOR. THESE COSTS WILL FORM THE BASIS OF PAYMENT IN THE EVENT THAT MATERIALS AND LABOR QUANTITIES REQUIRE ADJUSTMENT.

PROPOSED WALL & CONSTRUCTION BENCH: \_\_\_\_\_ APPROX. XX C.Y. CUT

EXCESS CUTTINGS TO BE PLACED ON BEACH: \_\_\_\_\_ APPROX. XXX C.Y. FILL

NOTE: MINOR QUANTITIES FOR TIEBACKS NOT SHOWN, CUTTINGS SHALL BE PLACED AT BASE OF BLUFF/BEACH

BASIS OF BEARINGS

THE BASIS OF BEARINGS FOR THIS PROJECT IS BASED ON FOUND MONUMENTS ALONG THE CENTERLINE OF SHORELINE DRIVE, BEARING N-58°-30'-00" W PER 7 MB 46.

BENCHMARK:

THE BENCHMARK FOR THIS PROJECT IS THE CITY OF PISMO BEACH SECONDARY HORIZONTAL AND VERTICAL CONTROL POINT 133. BEING A 2-1/2" BRASS CAP STAMPED "CITY OF PISMO BEACH BM#133" ON THE TOP OF CURB ON THE SOUTHWESTERLY SIDE OF OCEAN BOULEVARD ALONG THE PROLONGATION OF VISTA DEL MAR AVENUE CENTERLINE, ELEVATION 35.19' (NAVD88)

EROSION CONTROL NOTES

1. EROSION CONTROL MEASURES SHALL BE FULLY INSTALLED AT ALL TIMES.
2. ALL SITE ACCESSES SHALL BE PROTECTED AGAINST EROSION AT ALL TIMES THAT WORK IS NOT BEING PERFORMED ON THE SITE, INCLUDING EVENINGS, WEEKENDS AND HOLIDAYS. SUCH PROTECTION MAY BE REMOVED TO PROVIDE ACCESS TO THE SITE DURING WORK HOURS IF AND WHEN IT IS NOT REQUIRED DUE TO WEATHER CONDITIONS.
3. THE FIRST DOWNSTREAM STORM DRAIN INLET SHALL BE PROTECTED PER DETAIL.
4. ALL STOCKPILES SHALL BE PROTECTED AGAINST WIND AND WATER EROSION, PER DETAIL, IMMEDIATELY UPON PLACEMENT.
5. PERMANENT EROSION CONTROL MEASURES SHALL BE FULLY ESTABLISHED TO THE SATISFACTION OF THE CITY ENGINEER PRIOR TO FINAL.
6. IN THE EVENT OF OFF-SITE EROSION, THE PROPERTY OWNER AND/OR HIS REPRESENTATIVE(S) SHALL BE RESPONSIBLE FOR CLEANUP AND ALL ASSOCIATED COSTS OR DAMAGES.
7. EROSION CONTROL PLANS REPRESENT THE MINIMUM ACCEPTABLE PROTECTION. FURTHER MEASURES WILL BE REQUIRED, TO THE SATISFACTION OF THE CITY ENGINEER IN THE EVENT OF INADEQUACY OR FAILURE.
8. THE EROSION CONTROL MEASURES SHOWN ON THESE DRAWINGS ARE SUGGESTIONS ONLY.
9. IMPLEMENTATION OF EROSION CONTROL SHALL NOT BE LIMITED TO THE DEVICES SHOWN ON THESE DRAWINGS, AND THE CONTRACTOR MAY BE REQUIRED TO INSTALL ADDITIONAL TEMPORARY BMPs AS NECESSARY TO PREVENT STORMWATER POLLUTION AND EROSION.
10. CONTRACTOR SHALL IMPLEMENT A COMPLETE EROSION CONTROL PROGRAM THROUGHOUT THE DURATION OF THE PROJECT.
11. PLAN SHALL MEET THE APPLICABLE REQUIREMENTS OF THE STATE WATER RESOURCE CONTROL BOARD.
12. EROSION CONTROL SHALL BE IN PLACE PRIOR TO START OF CONSTRUCTION AND CHANGED AS WARRANTED BY FIELD CONDITIONS.

POST CONSTRUCTION STANDARD NOTES

POST-CONSTRUCTION REQUIREMENTS SHALL BE MET TO THE SATISFACTION OF THE CITY ENGINEER PRIOR TO FINAL.

THE CITY OR A THIRD PARTY SHALL REQUEST INSTALLATION OF STRUCTURAL CONTROL MEASURES (APPLICABLE TO PROJECT SUBJECT TO POST-CONSTRUCTION REQUIREMENTS 2-5). IT IS THE OWNERS/CONTRACTORS RESPONSIBILITY TO NOTIFY THE CITY AND THIRD PARTY INSPECTOR DURING INSTALLATION. A REPORT SHALL BE PROVIDED TO THE CITY OF PISMO BEACH UPON INSTALLATION INCLUDING PHOTOS.

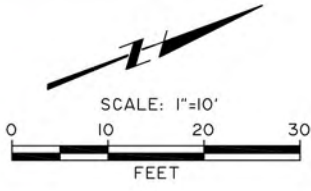
PRELIMINARY CONCEPTUAL PLANS - NOT FOR CONSTRUCTION

CITY OF PISMO BEACH, CALIFORNIA ENGINEERING AND PROJECT DEVELOPMENT DEPARTMENT				TERRACOSTA CONSULTING GROUP ENGINEERS & GEOLOGISTS 3890 MURPHY CANYON ROAD, SUITE 200 SAN DIEGO, CA 92123 PHONE: (858) 573-6900 WWW.TERRACOSTA.COM		TerraCosta Consulting Group		REVISION	DATE	FULL SIZE: 24x36 (NTS) HALF SIZE: 11x17 (NTS) DATE: 7-31-20 NOTE: THIS DRAWING IS REDUCED AND NOT TO SCALE IF SHEET SIZE IS SMALLER THAN 24" x 36"	BLUFF STABILIZATION - 2151 & 2141 SHORELINE DRIVE		SHEET NO: 4	
APPROVED BY	BY	DATE	APPROVED BY:	DIRECTOR OF ENGINEERING & PROJECT DEVELOPMENT DATE		PROJECT NOTES & SPECIFICATIONS		PROJECT NOTES & SPECIFICATIONS		PROJECT NOTES & SPECIFICATIONS		PROJECT NOTES & SPECIFICATIONS		Exhibit 4 A-3-PSB-21-0074 Page 22 of 27





SEE CROSS SECTION ON SHEET 7  
DEPICTING THE RELATIVE  
DIFFERENCE BETWEEN THE  
2008 & 2019 SURVEYS



2019 MHTL  
(4.54' NAVD 88)

TOE OF BLUFF PER  
2019 SURVEY

TOP & TOE OF  
BLUFF PER 2008  
SURVEY

TOP OF BLUFF PER  
2019 SURVEY

2008 MHTL  
(4.54' NAVD 88)

APPROXIMATE TOE  
OF PROPOSED WALL

GEOSOLUTIONS  
BORING B-1

APPROXIMATE TOP  
OF PROPOSED WALL

2151

APN 010-521-019

GEOSOLUTIONS  
BORING B-2

APN 010-521-018

BACKGROUND IMAGE IS  
APPROXIMATE AND FOR  
GENERAL REFERENCE ONLY.  
IMAGE REPRODUCED FROM  
GOOGLE EARTH  
IMAGE DATE: 4-9-13

CITY OF PISMO BEACH, CALIFORNIA ENGINEERING AND PROJECT DEVELOPMENT DEPARTMENT			
APPROVED BY	BY	DATE	APPROVED BY:
DIRECTOR OF ENGINEERING & PROJECT DEVELOPMENT			
DATE			

**TERRACOSTA CONSULTING GROUP**  
ENGINEERS & GEOLOGISTS  
3890 MURPHY CANYON ROAD, SUITE 200  
SAN DIEGO, CA 92123 PHONE: (858) 573-6900  
WWW.TERRACOSTA.COM



REVISION	DATE

FULL SIZE:  
24x36 (1"=10')  
HALF SIZE:  
11x17 (1"=20')  
DATE: 7-31-20  
NOTE: THIS DRAWING IS  
REDUCED AND NOT TO  
SCALE IF SHEET SIZE IS  
SMALLER THAN 24" x 36".

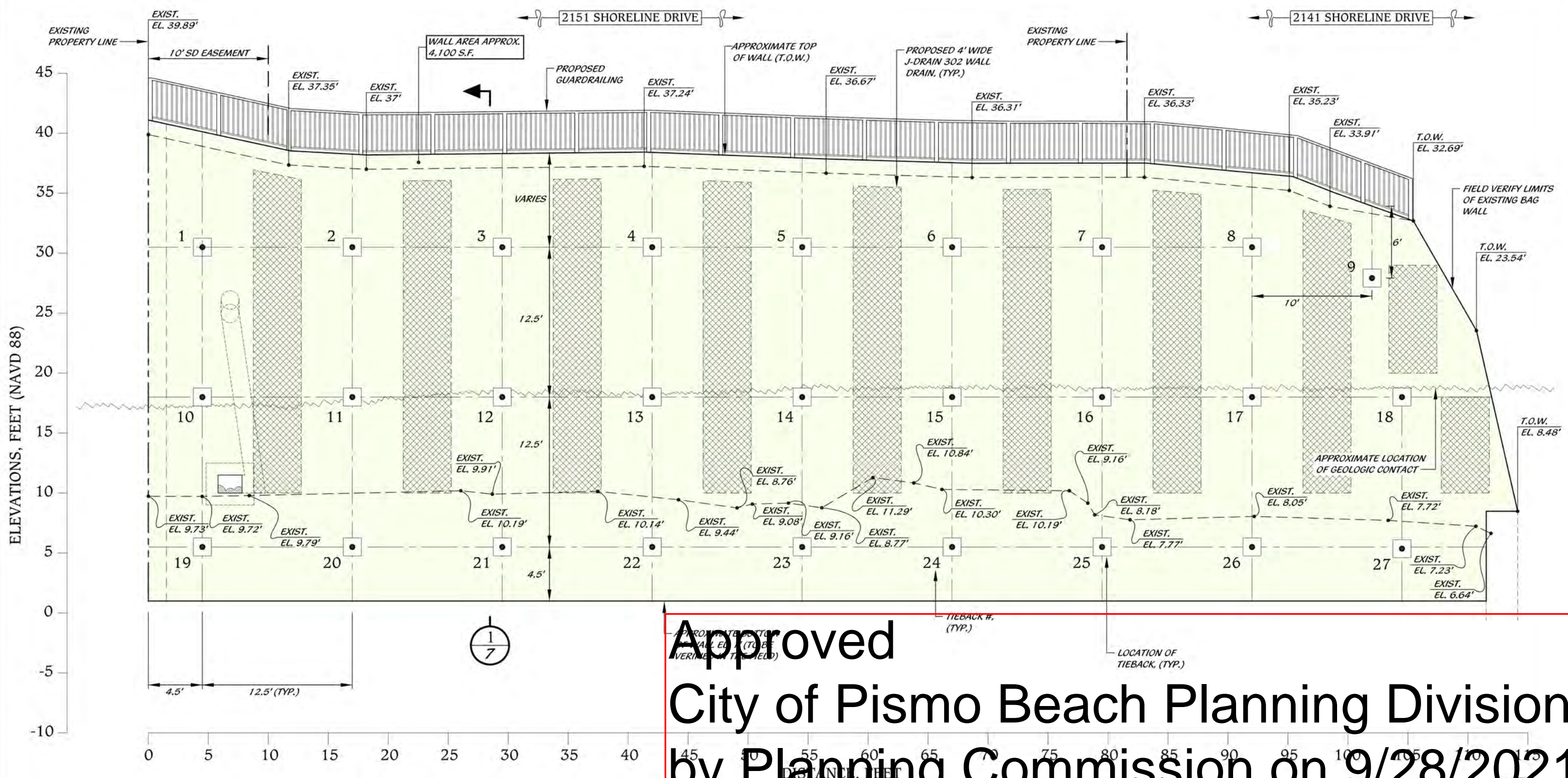
BLUFF STABILIZATION - 2151 & 2141 SHORELINE DRIVE

SHEET TITLE:  
PROPOSED REPAIR SITE PLAN



SHEET NO:  
**5**  
Exhibit 4  
A-3-PSB-21-0074  
Page 23 of 27





Approved  
 City of Pismo Beach Planning Division  
 by Planning Commission on 9/28/2021  
 Resolution No. PC-R-2021-017  
 Planner: Michael Gruver Associate  
 Planner

CITY OF PISMO BEACH, CALIFORNIA  
 ENGINEERING AND PROJECT DEVELOPMENT DEPARTMENT

APPROVED BY:	BY:	DATE:	APPROVED BY:
DIRECTOR OF ENGINEERING & PROJECT DEVELOPMENT			
DATE:			

**TERRACOSTA CONSULTING GROUP**  
 ENGINEERS AND GEOLOGISTS  
 3890 MURPHY CANYON ROAD, SUITE 200  
 SAN DIEGO, CA 92123 PHONE: (858) 573-6900  
 WWW.TERRACOSTA.COM



**TerraCosta**  
 Consulting Group

**PROPOSED WALL ELEVATION**

**BLUFF STABILIZATION - 2151 & 2141 SHORELINE DRIVE**

**PROPOSED WALL ELEVATION**

**PRELIMINARY CONCEPTUAL PLANS - NOT FOR CONSTRUCTION**

**SHEET NO. 6**

**Exhibit 4**

**A-3-PSB-21-0074**

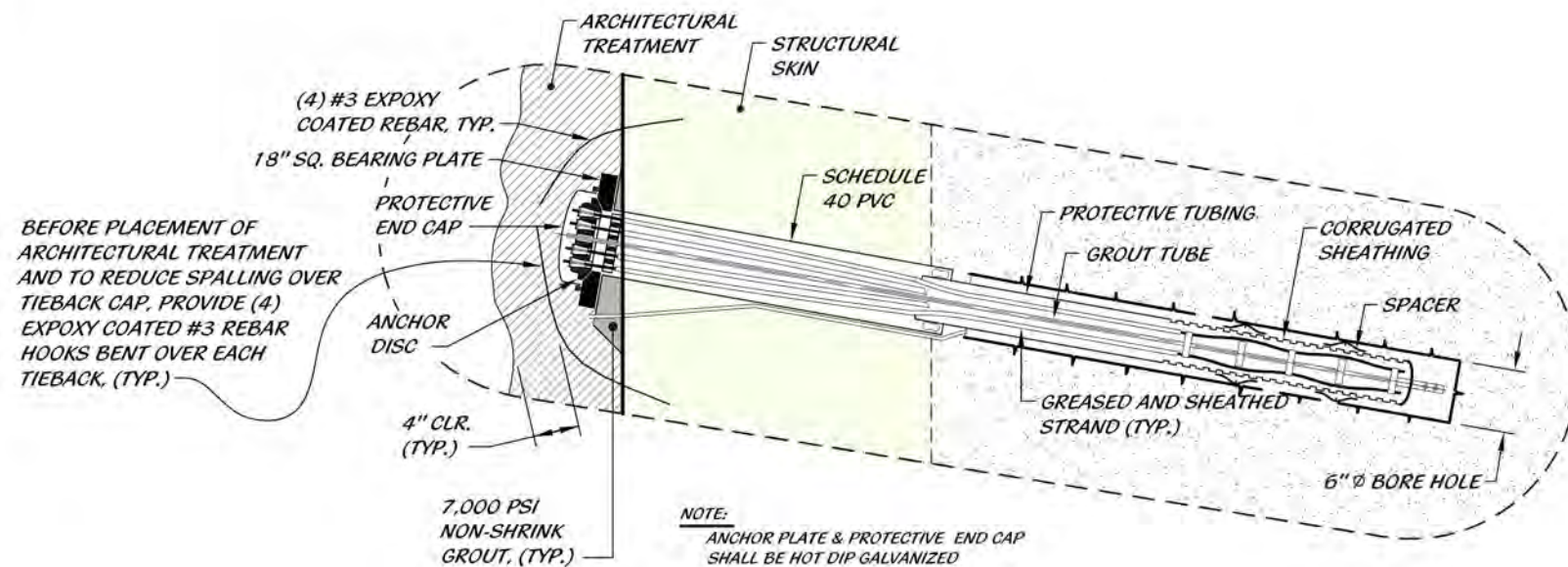
**Page 24 of 27**



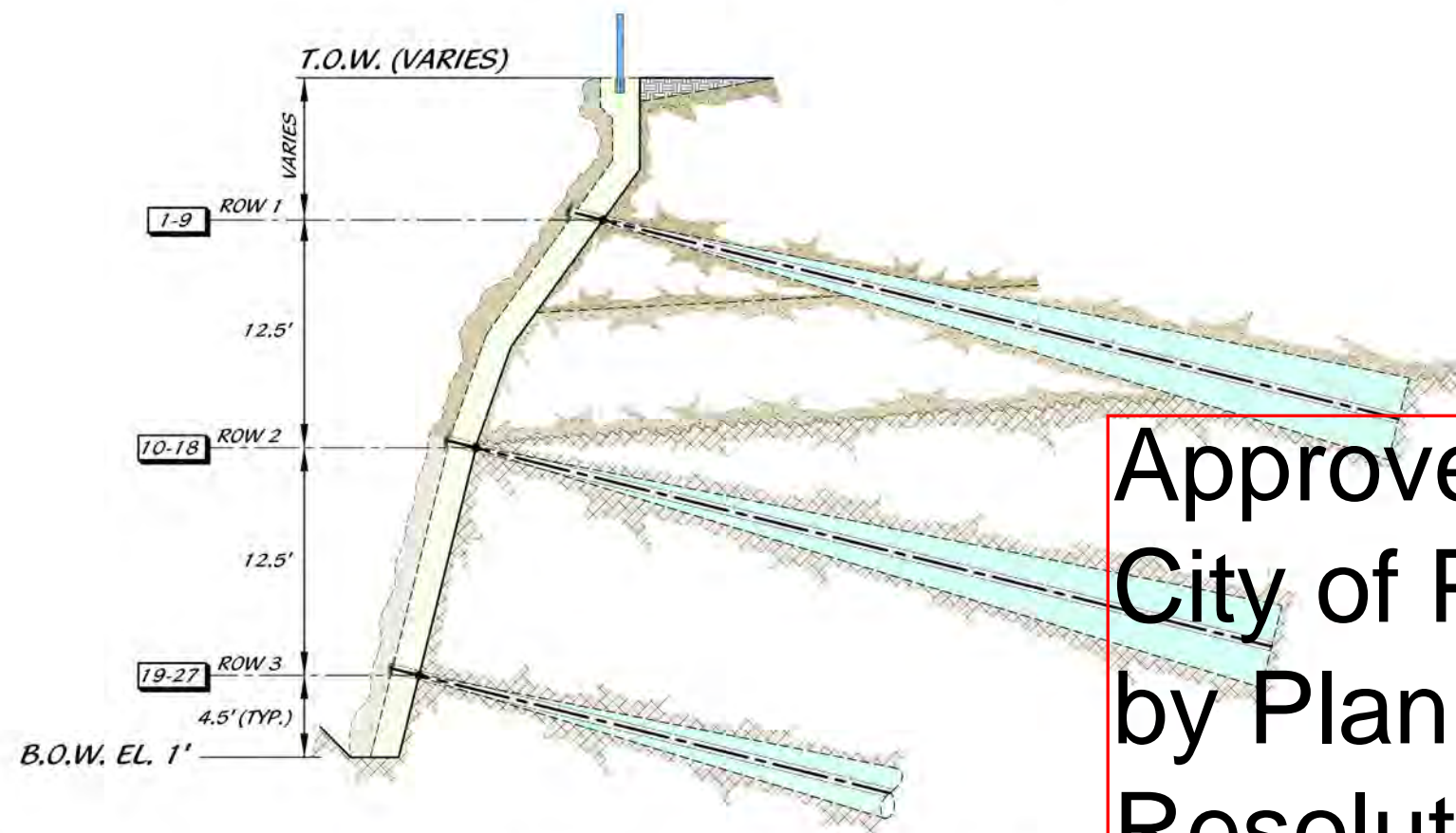




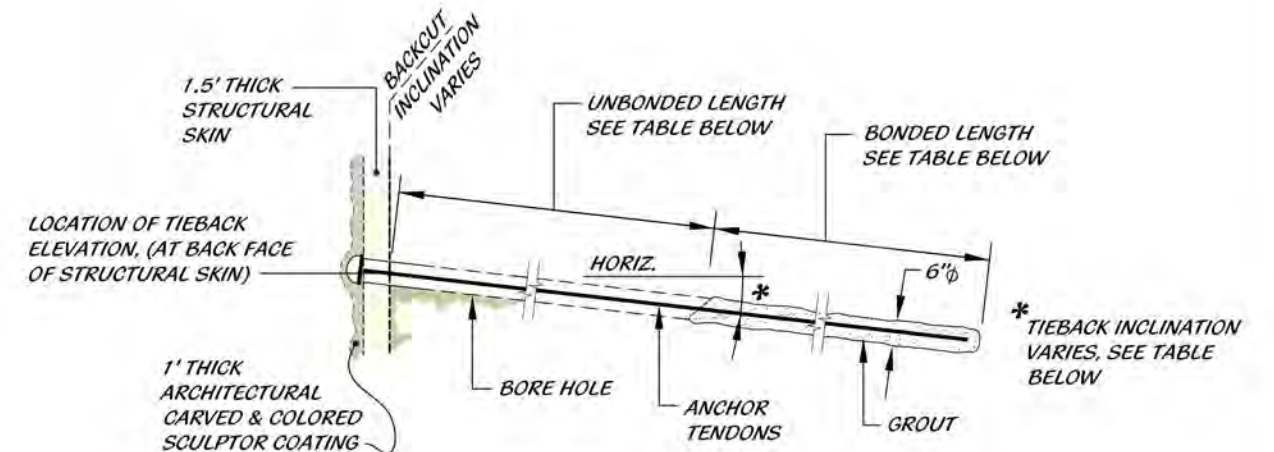




**MULTISTRAND ANCHOR DETAIL**  
WITH DOUBLE CORROSION PROTECTION  
NOT TO SCALE



**TYPICAL TIEBACK ANCHOR LAYOUT**  
NOT TO SCALE



**TYPICAL ANCHOR SCHEMATIC**  
NOT TO SCALE

**TIEBACK ANCHOR SCHEDULE**

ANCHOR NUMBERS	ANCHOR ROW	MIN. UNBONDED LENGTH (FT)	MIN. BOND LENGTH (FT)	MIN. TOTAL LENGTH (FT)	DESIGN LOAD (kips)	NO. OF 0.6\" DIA. STRANDS	PROOF LOAD (kips)	LOCK OFF LOAD (kips)
1-9	1	25	20	45	xx	X	xx	xx
10-18	2	25	20	45	xx	X	xx	xx
19-27	3	25	20	45	xx	X	xx	xx

! BONDED LENGTHS SHOWN ON THIS TABLE ARE FOR GENERAL COST ESTIMATING PURPOSES ONLY. CONTRACTOR SHALL BE RESPONSIBLE FOR DEVELOPING THE REQUIRED BONDED LENGTHS SUBJECT TO THE APPROVAL OF THE ENGINEER OF RECORD.

ANCHOR NUMBERS	HORIZONTAL ANGLE	ANCHOR BATTER (H:V)
1-9	TBD	TBD
10-18	TBD	TBD
19-27	TBD	TBD

**TIEBACK ANCHOR TESTING**

TEST ALL TIEBACKS TO 1.33xDESIGN LOAD.

THE LOAD CYCLE SHALL CONSIST OF THE FOLLOWING SEQUENCE:

0.10P, 0.25P, 0.50P, 0.75P, 1.00P, 1.25P, 1.33P  
(HOLD FOR CREEP TEST)

P=(DESIGN LOAD)

AT EACH INCREMENT, THE MOVEMENT OF THE TENDON SHALL BE RECORDED TO THE NEAREST 0.001 INCH WITH RESPECT TO AN INDEPENDENT FIXED REFERENCE POINT. THE JACK LOAD SHALL BE MONITORED WITH A PRESSURE GAUGE OR LOAD CELL.

THE CREEP TEST SHALL CONSIST OF THE FOLLOWING:

1. HOLD THE 1.33P LOAD FOR 60 MINUTES. WITH THE LOAD HELD CONSTANT, RECORD ANCHOR MOVEMENT (TOTAL MOVEMENT) SHALL BE RECORDED AT 15-MINUTE, 2-MINUTE, 3-MINUTE, 4-MINUTE, 6-MINUTE AND 10-MINUTE TIME INTERVALS.

IF THE MOVEMENT BETWEEN THE 1-MINUTE AND THE 10-MINUTE INTERVALS IS 0.40 INCH OR MORE, THE LOAD SHALL BE MAINTAINED FOR AN ADDITIONAL 10 MINUTES FOLLOWED BY CREEP TEST.

EXTENDED CREEP TEST SHALL CONSIST OF HOLDING THE 1.33P LOAD FOR 60 MINUTES. WHILE THE LOAD IS HELD CONSTANT, ANCHOR MOVEMENT (TOTAL MOVEMENT) REFERENCED TO A FIXED POINT SHALL BE RECORDED AT 15, 25, 30, 45 AND 60 MINUTES.

ACCEPTANCE AND REPLACEMENT: THE ENGINEER SHALL REVIEW ALL TESTS AND DETERMINE IF AN ANCHOR IS ACCEPTABLE.

PRELIMINARY CONCEPTUAL PLANS NOT FOR CONSTRUCTION



**TIEBACK BEARING HORIZONTAL ANGLE**  
NOT TO SCALE

BLUFF STABILIZATION - 2151 & 2141 SHORELINE DRIVE

SHEET TITLE:

TIEBACK DETAILS

8

Exhibit 4

A-3-PSB-21-0074

Page 26 of 27

Approved  
City of Pismo Beach Planning Division  
by Planning Commission on 9/28/2021  
Resolution No. PC-R-2021-017  
Planner: Michael Gruver Associate  
Planner

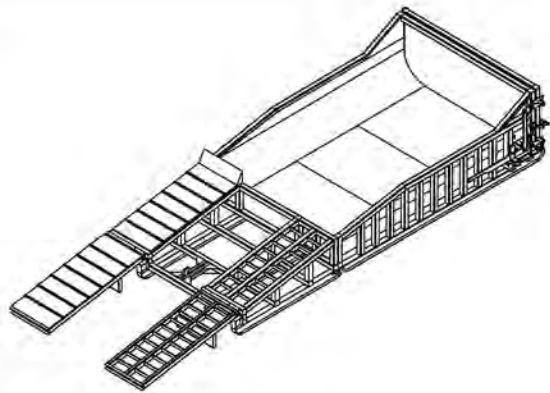
CITY OF PISMO BEACH, CALIFORNIA ENGINEERING AND PROJECT DEVELOPMENT DEPARTMENT			
APPROVED BY:	BY:	DATE:	APPROVED BY:
DIRECTOR OF ENGINEERING & PROJECT DEVELOPMENT			
DATE:			

**TERRACOSTA CONSULTING GROUP**  
ENGINEERS AND GEOLOGISTS  
3890 MURPHY CANYON ROAD, SUITE 200  
SAN DIEGO, CA 92123 PHONE: (858) 573-6900  
WWW.TERRACOSTA.COM



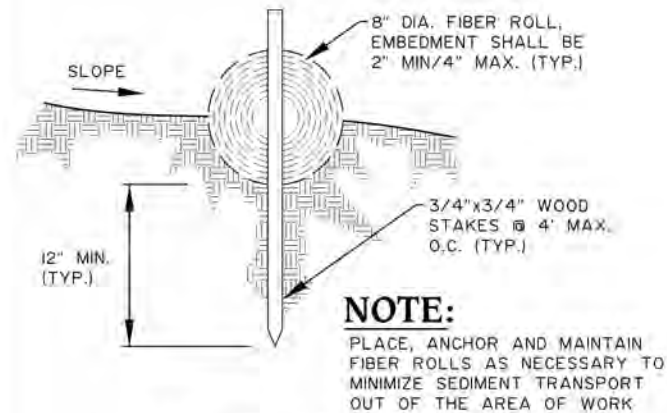
REVISION	DATE
FULL SIZE: 24x36 (NTS)	
HALF SIZE: 11x17 (NTS)	
DATE: 7-31-20	
NOTE: THIS DRAWING IS REDUCED AND NOT TO SCALE. IF SHEET SIZE IS SMALLER THAN 24" x 36"	





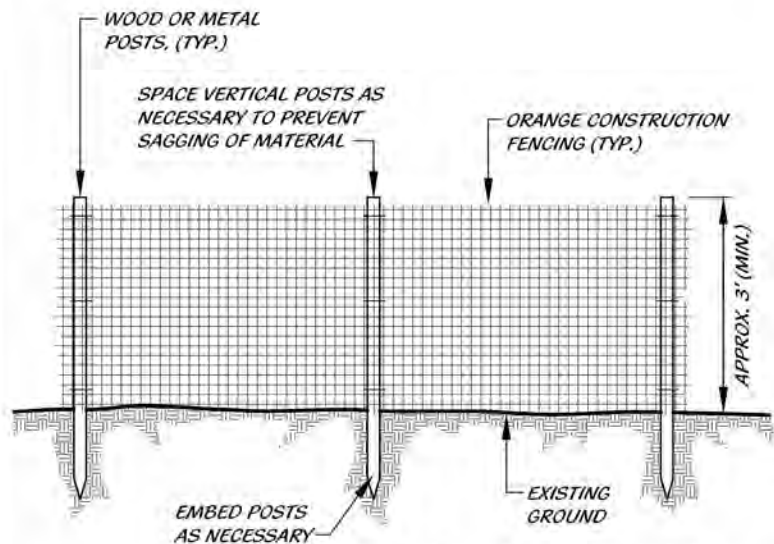
ROLL-OFF CONCRETE WASHOUT

NO SCALE



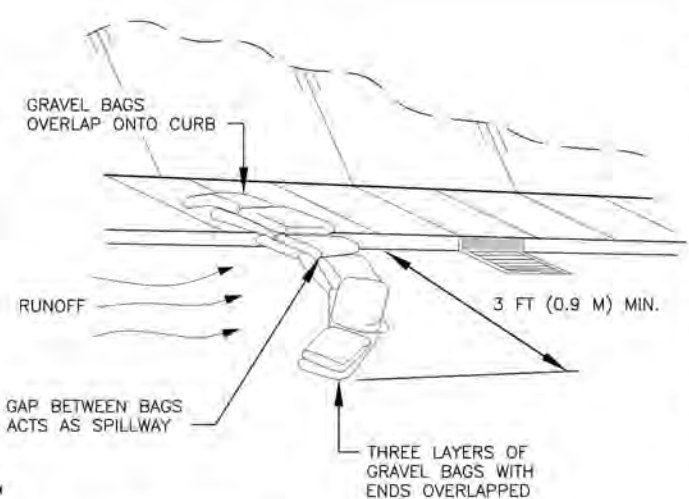
FIBER ROLL DETAIL

NO SCALE



CONSTRUCTION FENCE DETAIL

NOT TO SCALE



NOTES:

PLACE, ANCHOR AND MAINTAIN GRAVEL BAGS AS NECESSARY TO MINIMIZE SEDIMENT TRANSPORT OUT OF THE AREA OF WORK

CONTRACTOR SHALL PLACE, ANCHOR AND MAINTAIN FILTER FABRIC OR SEDIMENT TRAPS TO PREVENT TRANSPORT OF MATERIALS INTO STORM DRAIN SYSTEMS

GRAVEL BAG DETAIL

NO SCALE

CONSTRUCTION FENCING NOTES:

1. IN ADDITION TO JOBSITE SAFETY, CONSTRUCTION FENCING AND OR FLAGGING SHALL BE INSTALLED AS NECESSARY TO DELINEATE AREAS THAT THE CONTRACTOR SHALL AVOID DISTURBING OR USED TO KEEP THE GENERAL PUBLIC AWAY FROM THE CONTRACTOR'S CONSTRUCTION ACTIVITIES.
2. CONSTRUCTION FENCING AND OR FLAGGING SHALL BE INSTALLED PRIOR TO INITIATING ANY CONSTRUCTION ACTIVITIES.
3. CONSTRUCTION FENCING OR FLAGGING SHALL BE KEPT IN PLACE AND MAINTAINED UNTIL COMPLETION OF PROJECT.
4. ALL CONSTRUCTION FENCING SHALL BE REMOVED AT THE COMPLETION OF THE PROJECT.

HYDROSEEDING SPECIFICATIONS

1. SUPERVISION: ALL HYDROSEEDING IS SUBJECT TO APPROVAL BY THE OWNER'S REPRESENTATIVE.
2. HYDROSEED APPLICATION: A SLURRY OF FERTILIZER, SEED, AND FLEXIBLE GROWTH MEDIUM (FGM) SHALL BE AGITATED TO PROVIDE A UNIFORM MIX. THE OPERATOR SHALL SPRAY THE AREA WITH A COMPLETE UNIFORM VISIBLE COAT USING THE COLOR OF THE SPECIFIED PRODUCT AS A VISUAL GUIDE. THE SLURRY SHALL BE APPLIED IN A DOWNWARD DRILLING MOTION VIA A FAN STREAM NOZZLE. THE MATERIALS SHOULD BE UNIFORMLY IMPREGNATED WITH SEED. THE HYDROMULCHING SLURRY COMPONENTS SHALL NOT BE LEFT IN THE HYDROMULCH MACHINE FOR MORE THAN TWO HOURS. IF SLURRY COMPONENTS ARE LEFT FOR MORE THAN TWO HOURS IN THE MACHINE, THE CONTRACTOR SHALL ADD 50% MORE OF THE ORIGINALLY SPECIFIED SEED MIX TO ANY SLURRY MIX WHICH HAS NOT BEEN APPLIED WITHIN THE TWO HOURS AFTER MIXING. THE CONTRACTOR SHALL ADD 75% MORE OF THE ORIGINAL SEED MIX TO ANY SLURRY MIXTURE WHICH HAS NOT BEEN APPLIED WITHIN 6 HOURS AFTER MIXING. ANY MIXTURE WHICH HAS NOT BEEN APPLIED WITHIN 8 HOURS OF MIXING SHALL BE REJECTED AND DISPOSED OF OFF-SITE AT CONTRACTOR'S EXPENSE.
3. SPECIAL CARE IS TO BE EXERCISED BY THE CONTRACTOR TO PREVENT THE SLURRY FROM BEING SPRAYED ONTO ANY ADJACENT PLANTERS, PROPERTY, OR ONTO WALKS OR WALLS. ANY SLURRY SPRAYED ONTO THESE AREAS SHOULD BE CLEANED OFF BY THE CONTRACTOR.
4. GERMINATION STAGE IRRIGATION: WITHIN 12 HOURS AFTER HYDROMULCHING THE BENCH AREAS, THE WATERING SEQUENCE SHOULD BE INITIATED. THE WATER SHOULD ONLY BE APPLIED LONG ENOUGH TO MOISTEN THE AREAS, TAKING CARE NOT TO SATURATE OR WASH AWAY ANY FLEXIBLE GROWTH MEDIUM AND AND SEED. THE CONTRACTOR WILL BE REQUIRED TO REPAIR ALL SEED WASHING OR EROSION. A LIGHT, FREQUENT IRRIGATION SEQUENCE SHOULD CONTINUE UNTIL THE SEEDLINGS HAVE GROWN BEYOND THE GERMINATION STAGE. THE GERMINATION STAGE WILL RANGE FROM 45 TO 60 DAYS.
5. PREPLANTING FERTILIZER MAY BE APPLIED WITH THE HYDROSEED. FERTILIZER SHALL BE AN ORGANIC, PELLETTED OR CHIP TYPE, UNIFORM IN COMPOSITION, FREE-FLOWING, SUITABLE FOR APPLICATION WITH APPROVED EQUIPMENT, AND DELIVERED TO THE SITE IN UNOPENED, ORIGINAL CONTAINERS, EACH BEARING THE MANUFACTURER'S STATEMENT OF GUARANTEED ANALYSIS. FERTILIZERS SHALL BE AT RATES RECOMMENDED BY AGRICULTURAL SUITABILITY SOIL TESTING RESULTS.
6. SELECTED HYDROSEEDING CONTRACTOR MAY PROVIDE ALTERNATIVE MIX DESIGNS FOR REVIEW AND APPROVAL PROVIDED THAT THE MIX HAS BEEN USED ON OTHER SIMILAR COASTAL PROJECTS, AND IS ACCEPTABLE TO BOTH THE CALIFORNIA COASTAL COMMISSION AND THE CITY OF PISMO BEACH. SUBSTITUTED MIX DESIGNS SHALL CONSIST OF DROUGHT TOLERANT NATIVE PLANTS SPECIES AND ACCOMMODATE AS LITTLE HAND-WATERING AS POSSIBLE TO ACHIEVE PLANT GERMINATION WHILE NOT CAUSING EROSION. ALL DESIGNS WILL BE SUBJECT TO REVIEW AND APPROVAL BY THE OWNER'S REPRESENTATIVE.

HYDROSEED NOTES:

1. %P.L.S. = % PURITY TIMES % GERMINATION OF SEED. THIS INDICATES THE MINIMUM PERCENTAGE OF PURITY OF THE SEED TO BE PROVIDED.
2. THE SEED COMPANY SHALL APPLY ALL SEED WITHIN ONE YEAR OF COLLECTION.
3. HYDROSEEDING WILL BE MOST EASILY ESTABLISHED, IF APPLIED BETWEEN OCTOBER 15 AND MARCH 30.
4. ADDITIONAL RATES OF MULCH AND BINDER HAVE BEEN SPECIFIED TO BE ADEQUATE FOR THE STEEPNESS OF SLOPE.
5. CONTRACTOR IS ADVISED THAT THE ACTUAL AREA (ON SLOPE) FOR THIS PROJECT IS APPROXIMATELY 142% LARGER THAN THE AREA SHOWN IN THE PLAN VIEW. SEED, MULCH AND BINDER AND FERTILIZER AMOUNTS SHALL BE COMMENSURATE WITH THIS ACTUAL SLOPE AREA, (NOT THE PLANIMETRIC AREA.)

IRRIGATION NOTES:

1. DUE TO THE SENSITIVE NATURE OF THIS COASTAL BLUFF, TEMPORARY IRRIGATION SHALL BE ACCOMPLISHED BY HAND-WATERING, AS NECESSARY, UNDER THE SUPERVISION OF THE OWNER'S LANDSCAPE MAINTENANCE CONTRACTOR.
2. HAND-WATERING MAY BE ACCOMPLISHED WITH THE USE OF LOW PRECIPITATION RATE (< 1/2 HR.) SPRINKLERS AT THE TOP OF THE BLUFF OR STANDPIPES, BUT ONLY IF A MAINTENANCE PERSONNEL IS PRESENT TO MONITOR AND IRRIGATION. OTHERWISE THE IRRIGATION SHALL NOT BE ALLOWED.
3. SINCE THE HYDROSEED MIX IS NATIVE, IRRIGATION SHALL BE APPLIED ONLY AS NECESSARY TO PROMOTE THE GERMINATION AND EARLY GROWTH OF THE PLANTINGS, AND THEREAFTER FOR UP TO 26 MONTHS AFTER SEEDING, ONLY AS REQUIRED TO MINIMIZE PLANT MORTALITY.

HYDROSEED MIX

SPECIES	COMMON NAME	DENSITY (lbs./acre)	PURITY/GERMINATION
<i>Adiantum glaucum</i>	rocky wood	1	90/60
<i>Antennaria californica</i>	California sagebrush	2	50/50
<i>Encelia californica</i>	golden cholla	2	2/10
<i>Hazardia squarrosa</i>	saw toothed golden bush	2	10/25
<i>Lupinus chamissonis</i>	dune bush lupine	2	40/60
<i>Eriogonum fasciculatum</i>	California buckwheat	2	10/15
<i>Eriogonum fasciculatum</i>	black cholla	2	70/10
<i>Salvia mellifera</i>	black sage	2	70/50
TOTAL:		22 lbs/acre	

EXTENT OF HYDROSEEDING NOTES:

1. EXTENT OF HYDROSEEDING SHALL BE DETERMINED UPON COMPLETION OF CONSTRUCTION.
2. HYDROSEED SHALL BE APPLIED TO ALL UNIMPROVED AND DISTURBED AREAS THAT WILL NOT BE REPAIRED AND SEALED IN SEQUENCE TO COMPLETION OF THE UPPER BLUFF REPAIRS.

CITY OF PISMO BEACH, CALIFORNIA  
ENGINEERING AND PROJECT DEVELOPMENT DEPARTMENT

APPROVED BY:	BY:	DATE:	APPROVED BY:
DIRECTOR OF ENGINEERING & PROJECT DEVELOPMENT			
DATE:			

TERRACOSTA CONSULTING GROUP  
ENGINEERS & GEOLOGISTS  
3890 MURPHY CANYON ROAD, SUITE 200  
SAN DIEGO, CA 92123 PHONE: (858) 573-6900  
WWW.TERRACOSTA.COM

TerraCosta Consulting Group

REVISION	DATE	FULL SIZE 24x36 (NTS)
		HALF SIZE 11x17 (NTS)
		DATE 7-31-20
NOTE: THIS DRAWING IS REDUCED AND NOT TO SCALE IF SHEET SIZE IS SMALLER THAN 24" x 36"		

BLUFF STABILIZATION - 2151 & 2141 SHORELINE DRIVE

SHEET TITLE:

TEMPORARY EROSION CONTROL MEASURES



Approved  
City of Pismo Beach Planning Division  
by Planning Commission on 9/28/2021  
Resolution No. PC-R-2021-017  
Planner: Michael Gruyer Associate Planner



**CALIFORNIA COASTAL COMMISSION**

CENTRAL COAST DISTRICT  
725 FRONT STREET, SUITE 300  
SANTA CRUZ, CA 95060  
PHONE: (831) 427-4863  
FAX: (831) 427-4877  
WEB: WWW.COASTAL.CA.GOV

**COASTAL COMMISSIONER APPEAL FORM**

Appeal of a Local Government Coastal Development Permit Action

**1. Filing information**

Appeal number: A-3-PSB-21-0074  
Date appeal filed: November 12, 2021  
District: Central Coast District  
Commissioner: Dr. Caryl Hart  
Commissioner: Linda Escalante

**RECEIVED**

NOV 12 2021

CALIFORNIA  
COASTAL COMMISSION  
CENTRAL COAST AREA**2. Local CDP decision being appealed**

Local government: City of Pismo Beach  
CDP application number: P20-000056  
CDP decision: Approval with Conditions  
Date of CDP decision: September 18, 2021  
Project location: 2141 and 2151 Shoreline Drive, Pismo Beach  
Project description: Construction of a new approximately 110-foot long, 40-foot high, tied-back, textured and colored shotcrete seawall on the bluff face, bluff toe, and beach intended to protect a single-family residence constructed in 2009 (at 2151 Shoreline Drive) and a single-family residence constructed in 1938 and existing seawall (at 2141 Shoreline Drive)

### **3. Applicant information**

Applicants: Tony Hyman and John Okerblom

Applicants' addresses: 2141 Shoreline Drive (Hyman) and 2151 Shoreline Drive (Okerblom)

Applicants' phone numbers: (805) 773-6777 (Hyman) and (805) 295-6435 (Okerblom)

Applicants' email addresses: [thyman@charter.net](mailto:thyman@charter.net) and [okerjohn@gmail.com](mailto:okerjohn@gmail.com)

### **4. Grounds for this appeal**

See Attachment A

## 5. Commissioner appellant certification

I attest that to the best of my knowledge, all information and facts in this appeal are correct and complete.

Commissioner name: Linda Escalante

Commissioner signature: 

Date of signature: 11/12/2021



## 6. Commissioner appellant certification

I attest that to the best of my knowledge, all information and facts in this appeal are correct and complete.

Commissioner name: Caryl Hart

Commissioner signature: 

Date of signature: 11/09/2021

## **Attachment A: Reasons for Appeal**

The City of Pismo Beach approved a CDP authorizing an approximately 110-foot long, 40-foot high, tied-back, textured and colored shotcrete seawall on the bluff face, bluff toe, and beach seaward of 2141 and 2151 Shoreline Drive (City CDP application number P20-000056). The City-approved seawall is intended to primarily protect a single-family residence originally constructed in 2009 at 2151 Shoreline Drive as well as single-family residence originally constructed in 1938 and existing armoring at 2141 Shoreline Drive. The approved project raises questions of conformance with applicable LCP and Coastal Act provisions related to allowing shoreline armoring, and avoiding and appropriately mitigating coastal resource impacts from allowable such armoring, as follows.

The LCP only allows for shoreline armoring to protect existing principal structures or coastal-dependent uses in danger from erosion (see LUP Policy S-6, and IP Section 17.078.060(D) and (F)). The residences and existing seawall to be protected are not coastal-dependent uses. And although neither the Coastal Act nor the LCP explicitly identifies what qualifies as an “existing principal structure” for such armoring provisions, the Commission’s interpretation and application in terms of armoring (including as articulated in the Commission’s Sea Level Rise Policy Guidance)<sup>1</sup> is that such term means a principal structure that was in existence on January 1, 1977 (the effective date of the Coastal Act) and that has not subsequently been redeveloped.

In this case, the residence at 2151 Shoreline Drive that the armoring is intended to protect was approved in 2009 (City CDP file number 09-0065). At the time, the City found in its CDP approval for the residence that the project was consistent with LCP requirements for blufftop setbacks. Specifically, the LCP requires all structures to be set back a safe distance from the top of the bluff in order to retain the structures for a minimum of 100 years (or a minimum of 25 feet, whichever is greater), and to neither create nor contribute significantly to erosion, geologic instability or destruction of the site, or require the construction of protective devices (see LUP Policy S-3 and IP Section 17.078.050(A)). When deemed to meet these LCP requirements by the City at the time, the residence was approved with a 38-foot setback from the blufftop edge after the City determined that this distance was sufficient to allow 100 years of estimated use without the need or allowance for armoring based on a geotechnical assessment of the property.

Some twelve years later, the City has now permitted a seawall to protect the structure that was sited and designed to avoid the need for same in its lifetime, and at least an estimated 100 years. However, the existing residence does not qualify for such armoring as it is not an existing principal structure as the Commission understands that term, raising questions of consistency with the LCP’s armoring provisions. Furthermore, the City’s previous CDP for the residence was approved on the basis that the development was adequately setback for 100 years, as required by the LCP, without the need for armoring. As such, the City’s approval also raises questions of consistency with the LCP’s requirement that such new development not require shoreline armoring

---

<sup>1</sup> Available at <https://coastal.ca.gov/climate/slr/>.

but instead rely on adequate setbacks from the blufftop edge to ensure stability and safety.

In addition, the LCP only allows armoring for existing principal structures when such armoring is conclusively shown to be the least environmentally damaging feasible alternative to protect qualifying structures, and where all impacts are appropriately mitigated. In terms of the former, the City only evaluated alternative forms of armoring and drainage repairs, but did not appear to evaluate other more coastal resource protective alternatives (such as removal and/or relocation inland). In terms of the latter, it is also unclear if the project has been designed or adequately mitigated to address adverse impacts on local shoreline sand supply and other coastal resources, as required by the LCP. The City's approval includes a condition that states only that "soil materials to be displaced by the project" are to be mitigated with a fee, but it is unclear how the materials are to be calculated, and how the fee is to be developed. And there is no evaluation of the effect of the armoring structure otherwise on coastal resources, including sandy beach access here and cumulatively in the City, let alone mitigation for such identified impacts. In short, even if the project were to properly qualify for shoreline armoring consideration, it does not appear that the City's action has appropriately evaluated alternatives, impacts, and mitigations as required by the LCP and by the Coastal Act's access and recreation provisions (also applicable here to a City decision).

Finally, there is some question as to whether the approved project may be wholly or partly located in the Coastal Commission's retained CDP jurisdiction, including whether the project should have come before the Commission instead of the City in the first place, and whether the City had the legal authority to process a CDP application in this case.

In sum, the City-approved project authorizes a seawall that appears to protect a structure that is not allowed such protection under the LCP, and that, even if it were allowable, does not appear to have been has appropriately evaluated in terms of alternatives, impacts, and mitigations, all of which could lead to adverse, unmitigated, and not allowable coastal resource impacts. Thus, the City's approval warrants Commission review and deliberations on these issues and questions.