

CALIFORNIA COASTAL COMMISSION

SOUTH COAST DISTRICT OFFICE
301 E. OCEAN BLVD., SUITE 300
LONG BEACH, CA 90802-4830
(562) 590-5071



Th14a & Th14b

**A-5-LGB-20-0058-REC (32007 S. Coast Hwy, LLC) &
A-5-LGB-20-0059-REC (32005 S. Coast Hwy, LLC)**

February 5, 2026

CORRESPONDENCE



ATTORNEYS AT LAW

777 South Figueroa Street
34th Floor
Los Angeles, CA 90017
T 213.612.7800

Steven H. Kaufmann
D 213.612.7875
skaufmann@nossaman.com

Admitted only in California

Refer To File # 505362-0001

VIA ELECTRONIC MAIL

January 30, 2026

Th 14 a & b

Megan Harmon, Chair
Honorable Commissioners
California Coastal Commission
455 Market Street, Suite 300
San Francisco, CA 94105

Re: A-5-LGB-20-0059 (32005 S. Coast Hwy, LLC)
A-5-LGB-20-0058 (32007 S. Coast Hwy, LLC)

**Request for Reconsideration
Agenda Items – Feb. 5, 2026, #s 14 a & b**

Dear Chair Harmon and Commissioners:

This Firm represents the two Applicants, 32005 S Coast Hwy, LLC and 32007 S Coast Hwy, LLC. We appreciate your scheduling our Request for Reconsideration of your November 5, 2025 decision approving the Applicants' request for permanent slope stabilization. Our position at the hearing was unusual because we supported the Staff Recommendation and conditions. We asked only that the Commission delete a gratuitous one sentence finding concerning an erroneous bluff edge determination by Staff and which, unnecessarily, would inversely condemn the upper lot. The Commission declined. The issue before you deals only with that finding, the law – the Coastal Act – concerning it, and the facts which, unfortunately, were inaccurately provided to you by Staff. There is, commonsensically and under the Coastal Act, only one natural bluff edge relative to these properties, and it is at the 89-foot elevation contour.

Our formal request for reconsideration is set forth in a letter from me to the Commission which Staff has included in your "Correspondence." I respectfully ask that Staff also include as an additional "Exhibit" the 18-page July 2025 "Geotechnical Investigation and Determination of the Bluff Edge," prepared Geofirm. And, we submit in response to the current Staff Report "Comments Regarding Coastal Commission Staff Report," also prepared by Geofirm.

Geofirm performs geotechnical investigations throughout the coastal zone. But, it is, without any question, the most qualified geotechnical firm in terms of its knowledge concerning geology of Laguna Beach and the Applicants' two properties here. Since the inception of the Coastal Act, the firm has performed geotechnical investigations on well over 200 hundred Laguna properties. Just in this area alone, between Aliso Creek and Three Arch Bay, Geofirm estimates that it has undertaken approximately 76 such investigations, the majority of which involve bluff edge determinations.

Chair Megan Harmon
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You expect of your Applicants that they do a rigorous and thorough job of providing you and Staff with detailed and accurate factual information concerning the properties that come before you. Nowhere is that more evident than here. As your November Staff Report explained:

“Many geotechnical reports and updates have been performed by Geofirm for the proposed development. These reports are dated: July 2, 2015; May 2, 2016; June 7, 2016; July 5, 2016; September 12, 2018; November 5, 2018, February 13, 2019; March 28, 2019; May 2, 2019; May 30, 2019; June 27, 2019 and October 17, 2019. The applicants also provided an updated report from Aldrich Consulting Engineers dated November 8, 2024, in response to additional information that was requested from the Commission’s geologist Mr. Phillip Johnson. The geologic reports present results and recommendations regarding the proposed development at the subject site. Preparation of the reports included research of readily available geotechnical records for the site and environs, identification of the site’s subsurface soil and bedrock conditions by observation and exploration, collection of soil and bedrock sample, geotechnical laboratory testing of selected soil and bedrock samples obtained from exploratory work for the project, engineering analysis of the data obtained from the exploration and slope stability analysis.”

We respectfully submit that reconsideration should be granted because (1) there is relevant evidence which, in the exercise of reasonable diligence, we could not have presented to you at the hearing, and (2) there is an error of law which has the potential to alter the Commission’s November decision.

Reconsideration does not approve the permanent bluff stabilization project. A week after your November decision, the City of Laguna Beach approved a proposed home on the upper 32005 Coast Highway lot, concluding that the natural bluff edge is necessarily seaward of the existing home on the lower lot at 32007 Coast Highway and at the 89-foot elevation contour. That decision has been appealed, and you will hear it, hopefully, in the very near future. Reconsideration, if granted, would permit both matters to be heard at the same time and presumably the bluff edge issue as well.

Thank you for your consideration of our request.

Sincerely

A handwritten signature in blue ink, appearing to read "Steven H. Kaufmann". The signature is stylized with a large, sweeping "S" and a long horizontal line extending to the right.

Steven H. Kaufmann
Nossaman LLP

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ccs: Kate Huckelbridge, Executive Director
Karl Schwing, District Director
Amrita Spencer, Coastal Program Analyst
Emily Greer, Coastal Program Analyst
Mark Alonso, Esq.
Marshall Inninns, MIDG Architects
Larry Nokes, Esq., Nokes & Quinn
Steve Baron, Baron Consulting Group

January 30, 2026

Mr. Mark Alonso
c/o Marshall Innins Design Group
410 Broadway Street Suite 210
Laguna Beach, California 92651

Project No: 72179-07
Report No: 26-9942

Attention: Mr. Marshall Innins

Subject: **Comments regarding Coastal Commission Staff Report
“Request for Reconsideration”**
32005 (32007) South Coast Highway
Laguna Beach, California

INTRODUCTION

This letter is provided to supplement our findings and conclusions, set forth in our July 22, 2025 “Geotechnical Investigation and Determination of the Bluff Edge Location,” regarding the technical location of the bluff edge at the subject property. The purpose of that letter was to clearly present information to define the bluff edge and the associated regulatory setbacks in accordance with the City of Laguna Beach Land Use Element (LUE), consistent with our previous published studies. The findings presented in that letter were based on our extensive work on the two properties, and we incorporate those findings in providing additional comments on the Coastal Commission staff report, dated January 21, 2026, on a request for reconsideration following the Commission’s November 5, 2025 decision on the application for permanent slope stabilization.

As a general observation and based on over 30-years of personal professional experience in the City of Laguna Beach and the surrounding coastal communities, my office and I are fully aware of what the ocean can do to the coastline. We strongly believe and support that reasonable engineering setbacks are necessary and appropriate for safe development in the community. However, the bluff edge cited in the staff report is far outside coastal processes, has no genesis in, and is not the result of, any shoreline hazard. Put simply, the bluff edge offered by Mr. Johnson is solely the result of terrestrial processes, in terrestrial deposits, and is a result of an artificial man-made damage event.

Using a washout on a slope that damaged a terrestrial feature does not create a bluff edge and is outside the zone influenced by marine erosion. As discussed further below, it is unsupported and contrary to the point of having definitions for coastal bluff edges and setbacks for residential development. Since 2015, this office has performed several geotechnical investigations on these two lots to evaluate and repair previous slope instability and develop appropriate recommendations for residential development. We have prepared seven geotechnical reports, and our conclusions have been carefully reviewed and concurred with by the City’s peer reviewer, Kling Consulting Group, Inc. The staff presentation at the November

2025 hearing and again in the staff report regarding reconsideration unfortunately contain factual errors, but most notably, the assertion by Commission geologist that the entire slope between South Coast Highway and the 89-foot elevation contour is distinctly marine material. It is distinctly non-marine terrace deposits, as demonstrated by our multiple reports and the cross-section we prepared, discussed further below.

The July 22, 2025 “Geotechnical Investigation and Determination of the Bluff Edge Location”

In July 2025, we prepared our 18-page geotechnical evaluation of the bluff edge location. We examined the geologic background and conditions, conducted an aerial photo review, and undertook a topographic evaluation. Notably, our report concluded that the bluff edge relative to these two properties is located at the 89-foot contour elevation, seaward of the house on the 32007 Coast Highway property. That is the only coastal bluff-forming erosion process to have impacted the seaward margin of these properties in the last 83,000 to 105,000 years and which defines the location of the natural erosional processes that could impact stability or require setbacks to protect property improvements.

At the November 5, 2025 hearing on your applications, the Commission’s staff geologist explained to the Commission that the entire slope from Coast Highway to the beach below is of a “marine” origin, including to the top of the ridge. That was untrue, inaccurate, and misleading. While it is true that the top of the marine terrace here defines the bluff edge, the marine terrace ends at the 89-foot elevation contour. I have been asked to explain the graphic, Figure 1, to which the staff geologist referred during his testimony and which was shown to the Commission. This is a cross-section through the two properties before repair. Based on our extensive soil investigations, the cross-section shows the distinctly stratified geology underlying the properties. This is denoted by common map symbols used by the USGS, prominently identified in bold acronyms on the cross-section. “**Tso**”, at the bottom is bedrock, San Onofre Breccia, a cemented, strong and highly stable geologic formation in Laguna Beach.

The bedrock is overlain by “**Qtm**”, marine terrace deposits, which on these properties terminates at approximately the 89-foot elevation contour on top of which the house at 32007 Coast Highway is supported. The remainder of the slope as it extends up to Coast Highway consists of non-marine terrace deposits, “**Qtn**”. These are the accumulated sediments of terrestrial erosion from the upland terrain.

In no way or exception could that deposit be characterized as “marine” in origin. In fact, these deposits are not and have never been within the influence or impact of marine erosion or any shoreline processes. On these specific lots and below most of the other adjoining lots we have studied, these sediments are located well landward of the bluff edge and are not within the zone of influence of bluff edge erosion.

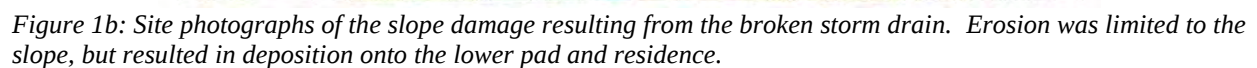


Figure 1a is an adaptation of the cross-section used by the Commission Geologist to justify the location of the uppermost break in slope that he interpreted to the bluff edge. This cross section was prepared by our office to depict the erosion damage at the property that resulted from the

storm drain overflow and resulting ground failure. Photographs from the storm drain overflow damage are presented in Figure 1b.

These events in 1993 and 1996, and the damaged topography, are not the result of marine erosion or coastal/shoreline processes or hazards of any kind, do not reflect a step-like feature in the bluff, and would not require setbacks. I was present at the November 5, 2025 hearing and was prepared to correct the fundamental inaccuracy provided to the Commission concerning the geologic character of this slope, but was informed I could not do so because the public hearing had been closed.

Documents Referred to Which Bear on Staff's Characterization of the Location of the Bluff Edge

The staff report refers to certain documents which it suggests bear on the location of the bluff edge. We disagree that they show any evidence of a natural bluff edge as addressed briefly below.



Figure 2a: The historic topographic map (A.F. Rodgers, 1885, Vicinity of San Juan Capistrano map, U.S. Coast Survey Maps of California, Southern California Coast T-Sheets, map T-1645. Red dots indicate location of the property based on both sets of longitude-latitude marking on T-1645. White line indicates a best estimate of the actual property location. Future Virginia Way is indicated on the map as an unnamed road.

Figure 2a is a blow-up of the T-Sheet as it relates to the properties and surrounding area. The lat./lon. for property plots on the two red dots. The hatching appears to reflect the beaches and drainages, including an old drainage that may have been present terminating near the property. Elevations presented are based on pre-NAVD 1927 data, possibly mean sea level or other. It appears to show a short bench or break in slope at the 40, 60, and 120 foot contours, but it is important to note that the contouring is ± 10 feet, and we know today that there are no breaks or steps at 40, 60, or 120 feet at the site. The maximum elevation on the property based on the T-1645 map appears to be approximately 120 feet.



Figure 2b: Google Earth current aerial overview of property.

There is no step-like feature or bluff edge shown at 150 feet, and the statement that “slope inclination flattens significantly to that of the marine terrace surface, which is very shallowly inclined seaward, is not only inaccurate but makes no sense because, as demonstrated by our multiple investigations, there is no marine terrace surface at that elevation. Given the current standards, reliance and a significant opinion cannot be based on a document this old and inaccurate, particularly when more recent and reliable information demonstrates to the contrary. The contouring of the slope is clearly innacurate. Figure 2b is a current photo of the same area for perspective and approximate scale.

Our July 2025 Geotechnical Report provided and analyzed numerous aerial photographs, including old aerals from 1938, 1939, and 1947, included in Figure 3. These do not show a natural bluff edge on the upper lot at the 150-foot elevation contour or otherwise on the non-marine (terrestrial) terrace deposits.

A 2010 report from Borella Geology, Inc., for an upslope site on the inland margin of Coast Highway describes the presence of a former natural canyon drainage based on his review of the 1939 photographs. The drainage is described as formerly transecting the upslope and subject sites and outletting on the bedrock slope face below.

However, the geomorphic features observed in the 1938-1939 photographs do not suggest the upslope drainage extended across the undeveloped (natural-looking) slope underlying the site and vicinity. In either case, however, the upslope portion of the drainage would have been incrementally backfilled to allow the construction of Coast Highway and adjoining residences. The photos also indicate the presence of a large, roughly bowl-shaped, deeply rilled slope spanning the width of the site, onto the adjoining properties to the north and south, and appears to be the result of severe surface erosion, perhaps caused by long-term uncontrolled water discharged from Coast Highway.



Figure 3: Aerial overview of property in 1938, 1939, and 1947, showing surface rilling of the terrestrial slope surface. No shoreline erosion or bluff edge is present above beachside cliff.



Figure 4: Close-up of a portion of California Coastal Records Project frame 7238102 dated 1972, showing the 32005 and 32007 properties prior to the 32007 residence construction. Approximate property lines depicted in white dash. Interpreted bluff edge depicted in red dash. The origin of the bench at elevation 89 feet appears to be

the result of non-marine terrace retreat and surficial gully erosion depositing onto a more resistant marine terrace, forming a level bench. This is not a geologic step from marine erosion or rounding of the bluff face.

Figure 4 is an oblique aerial from 1972 which shows the former house off Coast Highway on the upper lot and the slope to the natural bench before construction of the existing house at 32007 Coast Highway, which then breaks and slope vertically at approximately the 89-foot elevation contour to the beach below. In 1972, the Orange County Planning Commission approved a garage and tram to the lower property, explaining: “The property slopes gently from Coast Highway to the edge of the bluff, and from there to a steep cliff to the mean high tide line.” The gentle slope is visible in the aerial. There is no natural bluff edge on the slope.



Figure 5: Post-storm drain failure erosion map of the property from Borella Geology, (1997).

Borella Geology, Inc., also previously conducted a geotechnical evaluation following a failure of the storm drain on Coast Highway next to the upper lot. Figure 5 is a November 1997 letter from Borella, with a hand-drawn topo of the site, which shows no natural bluff edge at the 150 feet elevation contour and also no flat pad on the form home site. The letter that accompanied the topo states: “The non-marine terrace sands to silty sands that are being eroded usually form gullies that are parallel to the downslope direction. However, in this case, large erosion channels are forming across the slope face.”

In 2017, Toal Engineering prepared a topographic survey of the badly damaged upper slope on the 32005 Coast Highway property, and subsequently a 2018 post-slope repair topographic survey. Neither topographic survey reflects a natural bluff edge or natural step-like feature on this property.

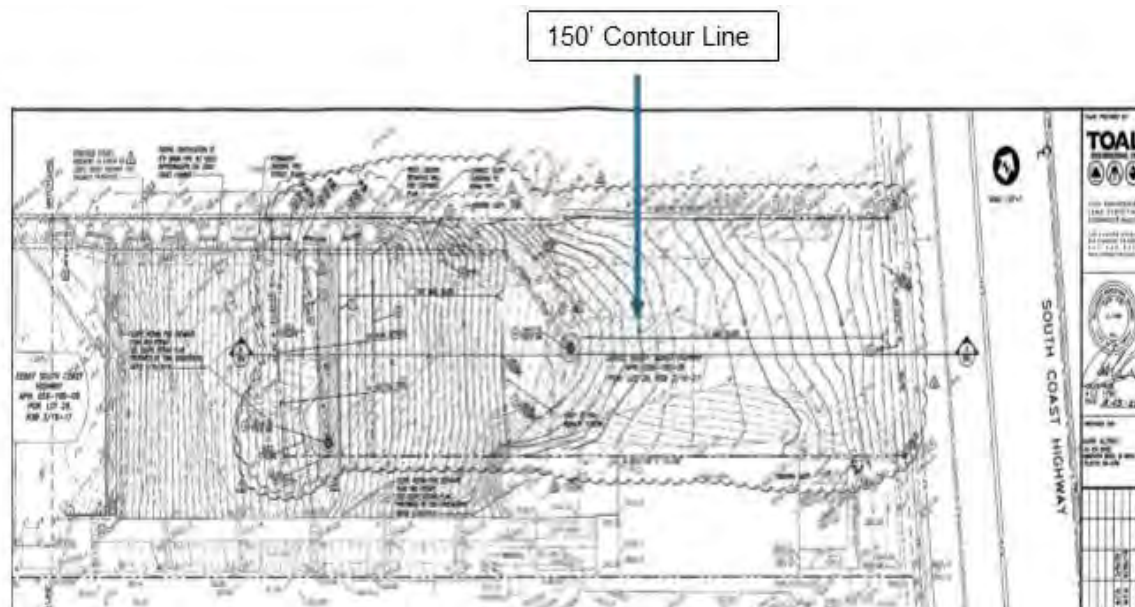


Figure 6: Toal Engineering topographic comparison of property.

Figure 6 is a composite of both surveys. In the underlying 2017 survey, the underlying contour lines show the badly damaged slope ended up with a somewhat varied topography closer to Coast Highway. On the downside, the contour lines drop off, on the upcoast side, they proceed in a different direction, and in the middle, they are somewhat wider where the water passed over the slope, generally creating a more gentle slope as it descended from Coast Highway.

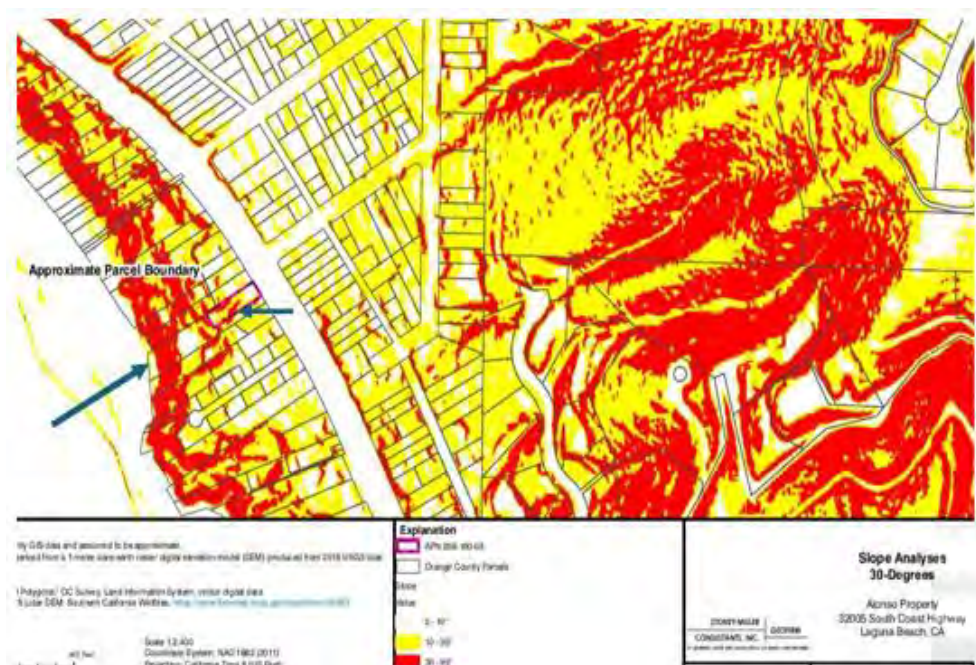


Figure 7a: Lidar analyses of 30 to 90-degree slopes

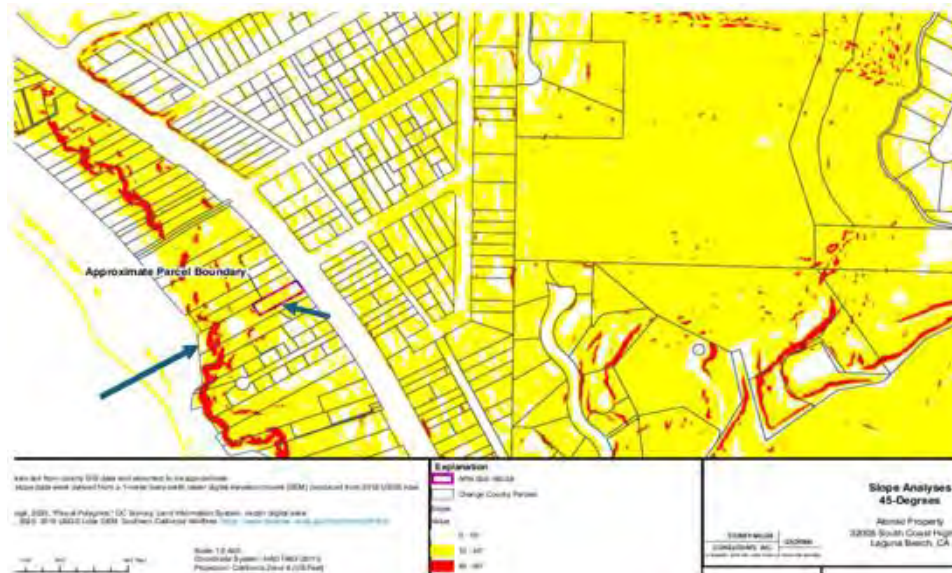


Figure 7b: Lidar analyses of 45 to 90-degree slopes (red).

The 2018 survey reflects the temporary stabilization work after the damaged slope was modified, with contour lines going in the opposite direction. The contour lines at a 150-foot elevation contour are a part of the new, temporary, man-made repaired slope, and do not reflect any bluff edge or step-like feature.

In our July 2025 Geotechnical Report we provided a three-dimensional view of the entire slope with LiDAR figures, LiDAR being used to create 3-D maps of the earth's surface. Figures 7a and 7b include two LiDAR figures, one with a 30 degree slope and the other with a 45 degree slope. They show plainly that there is a no step-like feature or bluff edge at the 150-foot contour elevation but a clear demarcation of the bluff edge seaward of the lower house at the 89-elevation contour, continuing all along this bluff.

CONCLUSION

Our office stands by our conclusion in the July 25, 2025 Geotechnical Report. Based on the current definitions provided by the City and Commission, the bluff edge is located at the 89-foot contour and transects the 32007 property at the seaward edge of the natural bench on which the lower house is located. There is no topographic or geologic justification or support for an upslope location of the bluff edge at or near the 150-foot contour.

LIMITATIONS

This investigation has been conducted in accordance with generally accepted practice in the engineering geology and soils engineering field. No further warranty is offered or implied. The conclusions presented herein are based on a review of published literature pertaining to the site and nearby properties that are not meant to imply a control of nature. Independent use of this report in any form cannot be approved unless written verification is obtained from this firm.

January 30, 2026

Project No. 72179-07

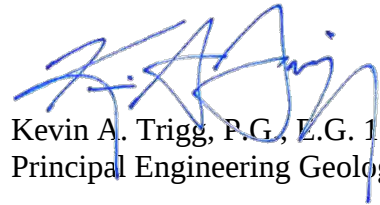
Report No. 26-9942

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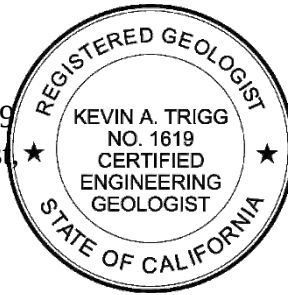
Thank you for this opportunity to be of continued service. If you have any questions, please contact this office.

Respectfully submitted,

GEOFIRM



Kevin A. Trigg, P.G., E.G. 1619
Principal Engineering Geologist



July 22, 2025

Mr. Mark Alonso
c/o Marshall Innins Design Group
410 Broadway Street Suite 210
Laguna Beach, CA 92651

Project No: 72179-07
Report No: 25-9827r

Attention: Mr. Marshall Innins

Subject: **Geotechnical Investigation and Determination of
the Bluff Edge Location**
32005 (32007) South Coast Highway
Laguna Beach, California

Introduction

This letter presents our findings and conclusions regarding the technical location of the bluff edge at the subject property. The purpose of this letter is to review the methodology utilized to delineate the bluff edge as presented in our previous studies (Appendix A, References 3 and 8) and to present the location of the associated regulatory setbacks in accordance with the City of Laguna Beach Land Use Element (LUE). This report is presented to address the proper location of the bluff edge. The findings presented herein are based on our extensive work on the property, including the adjoining lot (32007), and are intended to satisfy the staff-recommended special condition.

Previous Investigations

Beginning in 2015, several geotechnical investigations have been performed by our office on the subject and adjoining lot (32007) to evaluate and repair previous slope instability and to develop appropriate recommendations for residential development. Two reports in particular are pertinent to the ongoing design and approval of proposed improvements on the subject lot. These reports include a bluff edge stability investigation and a foundation design investigation.

As the subject lot is located within the Coastal Zone, the location and stability of the bluff edge are considered the primary constraints affecting the design of future improvements. These constraints were investigated as part of a response to the California Coastal Commission, which required additional geotechnical information concerning certain aspects of locally permitted construction. The results of our work, which include the bluff edge location, bluff stability, and future 75-year retreat limits, are presented in our 2018 and 2022 reports (References 3 and 8) and duplicated herein.

Geologic Background and Conditions

Overall, the topographic configuration of Laguna Beach and the subject property has been shaped for the past 1.3 million years by the interaction of the uplift of the San Joaquin Hills, sea-level fluctuation, and erosion. Studies (Grant, L.B., et. al., 1999) have provided evidence that explains and supports the San Joaquin Hills have been actively rising during the past 122,000 years at a reasonably consistent rate of 0.21 to 0.27 meters per thousand years. This finding explains the generation of the nine elevated marine shorelines present on the hills. These marine deposits (paleo-beaches) occur when the seaward margins of the hills are scoured during a sea-level high stand (glacial warming period) and are subsequently stranded when the sea-level retreats during a low stand (glacial cooling period). The subject property is underlain by the most recently stranded marine deposits on the San Joaquin Hills, scoured into the bedrock at a generally uniform elevation of 70 feet. Based on the work by Grant, et. al., this elevation corresponds to shoreline deposition during the sea-level high stand between 83,000 to 105,000 years ago.

Since that time, uplift and terrestrial erosion of the San Joaquin Hills continued, resulting in the accumulation of natural slope wash and alluvial sediment blanketing and burying the paleo beach sands with up to 60 feet of sediment at the subject property. This was a largely depositional environment throughout the property. No erosional processes capable of bluff-forming could have occurred at the site until the current sea-level high stand started around 11,000 years ago. For the past 11,000 years (Holocene time), the San Joaquin Hills have risen 7.5 feet, but the sea level during this period has remained essentially consistent with only mild fluctuation around the same level as is present today, and is also generally consistent with the sea level high stands during the past million years. During the Holocene, the ocean eroded the bedrock at sea level and shaped the shoreline and bluff backing the modern beach. The creation of the current bluff is generated by the removal of materials eroded at the beach or within the influence of shoreline erosion along the base of the bluff. This bluff face location is therefore constrained to the seaward margin of the property at 32007 South Coast Highway. This is the only bluff-forming erosion process to have impacted the seaward margin of the property in the last 83,000 to 105,000 years and defines the location of the natural erosional process that could impact stability or require setbacks to protect property improvements.

Throughout the development of Laguna Beach over the last 100-plus years, minor to moderate grading for building sites, access roads, and other manmade improvements has modified the landscape. In this area, the improvements for South Coast Highway, the general development of South Laguna, and the homes on 32005 and 32007 resulted in some grade changes, typically minor cuts and fills to provide level pads and uniform road surfaces.

One exception appears to be the building pad for 32007, which appears to be located on a natural bench at the non-marine and marine terrace contact. This natural pad appears to form and support the trend of adjacent development both up and down the coastline. The July 25, 1972 Staff report for the OC Planning Commission hearing regarding the 32007 garage and tram construction provided a property description that states:

The subject property is a flag shaped vacant parcel that extends from Coast Highway to the mean high tide line. The property slopes gently from Coast Highway to the edge of the bluff, and from there to a steep cliff to the mean high tide line.

This property description was topographically accurate then and remains accurate today.

Many of these modifications pre-dated aerial photography of the area. As a result, the impact on the natural landforms is uncertain; however, significant changes or large volumes of earthwork were unlikely to have occurred in the early years of the City, with the exception of the grading for Pacific Coast Highway. The impacts on the terrain resulting from the development of Coast Highway are demonstrated throughout the City of Laguna Beach and altered the topography on the subject site.

Aerial Photo Review

A detailed review and summary of the historical site conditions based on aerial photography was presented in the Reference 3 investigation published in September of 2018. Our office revisited these photographs to confirm or modify the conclusions presented in the prior report. Based on the reanalysis, we concur with the aerial photographic findings and opinions published in the 2018 study. The discussion from the 2018 report is reproduced below with a few modifications.

This review was focused on the geotechnical conditions affecting the performance and/or appearance of the subject property and surrounding areas as observed in aerial photographs available from the UCSB Library (Frame-Finder website), the California Coastal Records Project (CaliforniaCoastline.org website), and in-house stereoscopic pairs. Additional aerial photographs were obtained and reviewed from the Eagleview and Google Earth collections. These Eagleview images provide high-resolution but are limited to post-2000 photography. In total, the photographs reviewed span the years 1938 through 2016. The purpose of the review is to relate the pre-development site conditions to the possible location of the natural or current bluff edge as defined by the Laguna Beach Land Use Element (LUE) and the CCC. A collection of historic ground-based photography in Laguna Beach is maintained by the American Title Company. A portion of this collection was reviewed, but found no images in the vicinity of the subject property.

Aerial photographs from 1938 and 1939 predate the development of the subject site and adjoining properties, although PCH appears to have been constructed to its current width as observed today. A 2010 report from Borella Geology, Inc. for an upslope site on the inland margin of PCH describes the presence of a former natural canyon drainage based on his review of the 1939 photographs. The drainage is described as formerly transecting the upslope and subject sites and outletting onto the bedrock bluff face below. However, the geomorphic features observed in the 1938-1939 photographs do not suggest the upslope drainage extended across the undeveloped (natural-looking) slope underlying the site and vicinity. In either case, however, the upslope portion of the drainage would have been incrementally backfilled over several years to allow the construction of the highway and adjoining residences. It is uncertain if a portion of the drainage, if it did exist under the subject site, was backfilled as a part of this process.

The same aerial photos also indicate the presence of a large, roughly bowl-shaped, deeply rilled slope spanning the width of the subject site, onto the adjoining properties to the north and south, and extending to the blufftop on 32007. The feature does not appear related to the alleged former drainage, but rather appears to be the result of severe surface erosion, perhaps caused by long-term adverse surface-water discharge from PCH. This hypothesis is partially based on the location of the (now former) Caltrans storm drain catch basin, which was later constructed at a presumed low point in front of the subject site. The terrain otherwise suggests the exposed soils are likely comprised of natural terrace deposits, although old artificial fill placed during the grading for the highway and adjoining lot(s) may also be exposed.

Stereoscopic aerial photos from 1947 depict a structure on the 32005 lot. The residence is located on the upper pad between PCH and the aforementioned bowl-shaped erosional feature. Future oblique photographs indicate the residence was constructed at street level and extended approximately one story above the gently sloping upper pad. The downslope and adjoining areas otherwise appear untouched.

An aerial photograph from 1952 depicts a driveway and structure on the adjacent property to the north. The morphology apparent in the photograph suggests that most of the aforementioned bowl-shaped features had been partially backfilled or modified. A similar photo from 1960 suggests a portion of this fill was eroding in a similar manner as before, resulting in significant rilling. The upslope limits of this newer phase of erosion appear to coincide with the former limits.

An aerial photograph from 1965 indicates that minor grading may have modified the toe area of the eroded slope. An oblique aerial photograph from 1972 indicates the steeply rilled slope is a considerable distance from the rear of the future 32007 residence, and the natural bench is present. It appears likely the bench is a result of the gully drainage at the base of the non-marine terrace, refer to Photo 1. This perspective also shows the ascending slope to PCH on 32005 from the bench on 32007 is relatively gentle and uniform, supporting a walking trail, much like that described by the Staff for the OC Planning Commission that same year. This image also reveals that a structure on the adjoining site to the south is being or had been constructed at the adjacent bench elevation.

A structure on the 32007 lot, including the frontal garage and funicular path (or stairway), is present in a photograph from 1974, and the slope appears to remain moderately eroded. The presence of the development on 32007 suggests grading and infilling of upslope erosional scours and rills backing the landward side of the new residence were likely necessary to develop the building pad. The depth of fill or extent of remedial grading, if performed, is uncertain. A photograph from 1977 appears to reflect a similar condition.

A photograph from 1981 appears to depict the site as it remained for several years up until significant slope erosion jeopardized the 32005 structure in the early 1990s. The lower portion of the slope between the two structures (32005 and 32007) appears to be in a topographic condition similar to what is presented in an oblique aerial photograph from 1987 and as observed



Photo 1: Close-up of a portion of California Coastal Records Project frame 7238102 dated 1972, showing the 32005 and 32007 properties prior to the 32007 residence construction. Approximate property lines depicted in white dash. Interpreted bluff edge depicted in red dash. The origin of the bench at elevation 89 feet appears to be the result of non-marine terrace retreat and gully erosion depositing onto a more resistant marine terrace, forming a level bench.

This is not a geologic step from marine erosion or rounding of the bluff face.

during our onsite exploration in April of 2015. That is, the toe of the inland slope appears gullied and locally very steep. The top of the slope descending from the rear of the residence on 32005 appears to be some distance from the structure; however, the axis of the main gully appears to be encroaching landward as observed in a photograph from 1993.

Photographs spanning the years 1994 through 2000 are not available for review. However, reports from Borella Geology, Inc. (Reference 2) and public documents prepared by Toal Engineering, Inc. (Reference 16), obtained from the City of Laguna Beach website, indicate the site was increasingly impacted by damaging landward erosion and debris flow attributed to inadequate storm drain control associated with PCH. Over the course of several years and an apparent lack of remedial action, the structure on 32005 was eventually abandoned in 1998 due to severe undermining and structural damage. The abandoned structure is apparent in photographs from 2001 and 2002, but is absent in a photograph from 2004.

Oblique aerial photographs from 2004 and 2013 indicate the site generally remained in a quasi-stable state with steep, near-vertical gullied and rilled landward slopes. The site appeared in a similar state as observed during our 2015 investigation; however, the recently observed erosion along the lateral margins appeared to be encroaching upon the adjoining property to the north as reported.

Oblique aerial photography from 2001 to 2016 was obtained from Eagleview. The images in 2005, 2008, 2011 and 2014 clearly depict the gully and associated erosion on the flanks of the 32005 property. The 2016 image depicts the earthwork underway to stabilize the gully area and restore the 32005 property. The images presented by Google Earth consist of aerial photographs overlain onto topography that attempts to depict a three-dimensional perspective of the site and adjoining areas. These images do not provide sufficient quality and accuracy to further the determination of the bluff edge at this location.

It should be noted that the available records do not precede the construction of PCH or document the grading required to develop the various residential lots in the vicinity. We can surmise that a former natural drainage may have transected the upper 32005 site, and that artificial fill of undermined and variable depth was placed to create the pad and cross South Coast Highway, leading to the material being eroded and the creation of the gully. However, it also appears limited modification of the bedrock and terrace bluff backing the beach below 32007 occurred during this timeframe. The creation of the decks and stairs below the 32007 property utilized above-grade construction down to the beach. Little to no grading modification of the bluff would have been required, or appears to have occurred. The seaward edge of the lower pad for the residence at 32007 appears to conform to the natural edge of the bluff, with the 32007 residence constructed with limited to no building setback from the bluff edge.

Topographic Evaluation

Based on the exhibits provided with the Staff report, it appears the Commission is considering a potential bluff edge delineation at or near the 150 feet contour elevation, or near the 32005 upper pad at South Coast Highway. To evaluate this delineation, our office obtained the USGS 2018 Lariat LiDAR data set for this portion of the San Joaquin Hills, including the subject lot, refer to Plate 1, and Figures 1 to 3.

To further evaluate the potential for various steps or other grade breaks in the topography within the property and in the ascending terrain, our office presents the Lidar in a Digital Elevation Model in Figure 1. This format highlights the irregularities in the topography, with level or gently sloping areas in a white to lighter grey and steeper slopes depicted in darkening shades of grey, depending on the severity of the steepness. This LiDAR survey was obtained prior to the 32005 slope repair and shows the former southerly flowing drainage that transected the middle and lower portion of the property.

There does not appear to be a significant step or rounding of the topography parallel to the coastline along the western edge of South Coast Highway on 32005, 32007, or any of the adjoining lots north or south near the 150-foot elevation contour. While this image may be

difficult to interpret, Figure 2 considers the same DEM model with the areas that are inclined at 10-degrees and flatter as white, 10 to 30-degrees as yellow, and 30-degrees and steeper as red. This analysis clearly defines the drainage flanks on the middle 32005 property and the lack of a continuous seaward-facing slope on the lot and adjoining lots near South Coast Highway. Figure 3 considers the same DEM model with the areas that are inclined at 10-degrees and flatter as white, 10 to 45-degrees as yellow, and 45-degrees and steeper as red. This analysis clearly defines the bluff face backing the beach and extending continuously along the properties upcoast and downcoast of the 32007 site. Most importantly, no continuous, rounded, or stepped seaward-facing slope is present on the lot and adjoining lots near South Coast Highway.

Additionally, our office prepared cross-section A-A' transecting 32005 and 32007 South Coast Highway, and continuing northeast to the ridgetop at Monarch Crest. The section depicts the normal terrestrial irregularities that occur in natural slopes. The 150-foot elevation contour location is depicted, as well as the location our office recommends for the 89-foot contour that depicts the bluff edge for the 32007 property. Based on our findings, there is no bluff edge or setback within the 32005 property boundary.

SUMMARY OF FINDINGS

1. Based on the current definitions provided by the City of Laguna Beach and the California Coastal Commission, the bluff edge is located at the 89-foot contour and transects the 32007 property at the seaward edge of the natural bench.
2. Based on the current definitions provided by the City of Laguna Beach and the California Coastal Commission, the bluff edge is not located on or immediately adjacent to the seaward margin of the 32005 property.
3. Based on the current definitions provided by the City of Laguna Beach and the California Coastal Commission, there is no topographic or geologic justification or support for an upslope location of the bluff edge at or near the 150-foot contour.
4. Previous slope stability analyses confirm the bluff is adequately stable for 32007 residential construction and nominal 25-foot bluff edge setbacks (References 1 and 2).
5. Previous slope stability analyses confirm the 32005 property is adequately stable for residential construction as presently repaired (Reference 6). Moderate to loosely compacted soils in the upper lot would require deepened foundations or remedial grading prior to residential construction.

LIMITATIONS

This investigation has been conducted in accordance with generally accepted practice in the engineering geology and soils engineering field. No further warranty is offered or implied. The conclusions presented herein are based on a review of published literature pertaining to the site and nearby properties that are not meant to imply a control of nature. Independent use of this report in any form cannot be approved unless written verification is obtained from this firm.

July 22, 2025

Project No: 72179-07

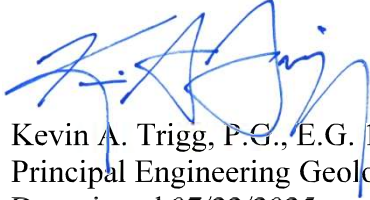
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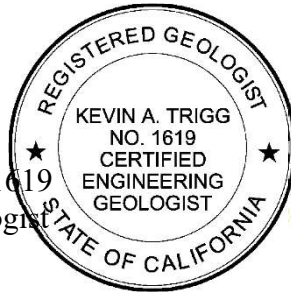
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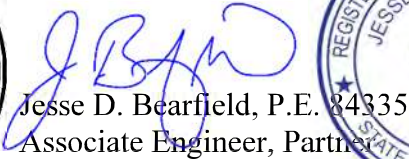
Thank you for this opportunity to be of continued service. If you have any questions, please contact this office.

Respectfully submitted,

GEOFIRM


Kevin A. Trigg, P.G., E.G. 1619
Principal Engineering Geologist
Date signed 07/22/2025




Jesse D. Bearfield, P.E. 84335
Associate Engineer, Partner



KAT/JDB: mr

Attachments: Figure 1– Slope Analyses, Greyscale
Figure 2– Slope Analyses, 30-Degrees
Figure 3– Slope Analyses, 45-Degrees
Appendix A – References
Appendix B – Aerial Imagery
Plate 1 – 2018 USGS LiDAR Topographic Map and Cross-Section A-A'

Distribution: Email to: Marshall Innins, marshall@midgarchitects.com



Note(s):
1. Parcel boundaries are from county GIS data and assumed to be approximate.
2. Elevation and slope data were derived from a 1-meter bare-earth raster digital elevation model (DEM) produced from 2018 USGS lidar.

Data Source(s):
1. County of Orange, 2023 "Parcel Polygons," OC Survey, Land Information System, vector digital data.
2. OCM Partners, 2025: 2018 USGS Lidar DEM: Southern California Wildfires, <https://www.fisheries.noaa.gov/inport/item/74383>.

Scale 1:2,400
Coordinate System: NAD 1983 (2011)
Projection: California Zone 6 (US Feet)
Vertical Datum: NAVD88 height (US Feet)

Explanation
 APN 056-160-08
 Orange County Parcels

**Slope Analyses
Greyscale**

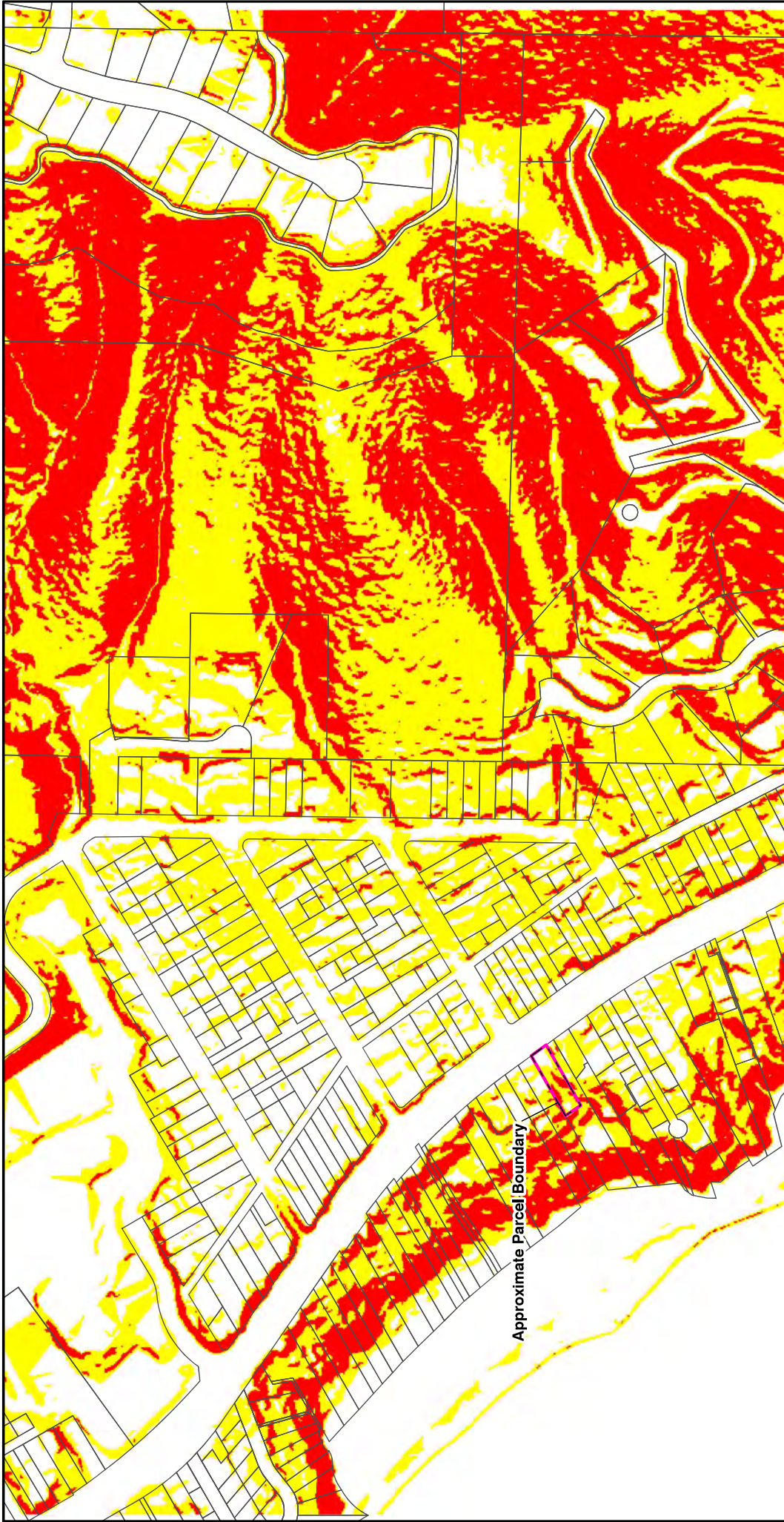
Alonso Property
32005 South Coast Highway
Laguna Beach, CA

STONE-MILLER
CONSULTANTS INC. | GEOFIRM
30 JOHNNY, SUITE 200 AUGUS VILLAS, CA 92644-880-288-8884

July 2025

Project No. 72179-07

Figure 1



Notes(s):
1. Parcel boundaries are from county GIS data and assumed to be approximate.
2. Elevation and slope data were derived from a 1-meter bare-earth raster digital elevation model (DEM) produced from 2018 USGS lidar.

Data Source(s):
1. County of Orange, 2023 "Parcel Polygons," OC Survey, Land Information System, vector digital data.
2. OCM Partners, 2025: 2018 USGS Lidar DEM: Southern California Wildfires, <https://www.fisheries.noaa.gov/inport/item/74383>.

Scale 1:2,400
Coordinate System: NAD 1983 (2011)
Projection: California Zone 6 (US Feet)
Vertical Datum: NAVD88 height (US Feet)

Explanation

APN 056-160-08
Orange County Parcels

Slope Value

0 - 10°
10 - 30°
30 - 90°

Slope Analyses 30-Degrees

Alonso Property
32005 South Coast Highway
Laguna Beach, CA

STONE-MILLER
CONSULTANTS INC. | GEOTIRM
30 JOURNEY, SUITE 200 LAGUNA BEACH, CA 92653-4004-0004

July 2025

Project No. 72179-07

Figure 2

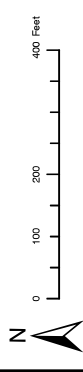


Notes(s):

1. Parcel boundaries are from county GIS data and assumed to be approximate.
2. Elevation and slope data were derived from a 1-meter bare-earth raster digital elevation model (DEM) produced from 2018 USGS lidar.

Data Source(s):

1. County of Orange, 2023 "Parcel Polygons," OC Survey, Land Information System, vector digital data.
2. OCM Partners, 2025: 2018 USGS Lidar DEM: Southern California Wildfires, <https://www.fisheries.noaa.gov/inport/item/74383>.



Scale 1:2,400
Coordinate System: NAD 1983 (2011)
Projection: California Zone 6 (US Feet)
Vertical Datum: NAVD88 height (US Feet)

Explanation

- APN 056-160-08
- Orange County Parcels

Slope

- Value
- 0 - 10°
- 10 - 45°
- 45 - 90°

**Slope Analyses
45-Degrees**

Alonso Property
32005 South Coast Highway
Laguna Beach, CA

STONEY-MILLER
CONSULTANTS INC. | GEOTIRM
30 JOHNSWAY, SUITE 200 JALISCO VALLEY, CA 92646-880-4884

July 2025

Project No. 72179-07

Figure 3

APPENDIX A

REFERENCES

APPENDIX A

REFERENCES

1. Geofirm, 2015, “Geotechnical Investigation, Erosion Repair and Proposed Single-Family Residence, 32005 South Coast Highway, Laguna Beach, California”; Project No. 72179-01, Report No. 15-7690, dated July 2.
2. Geofirm, 2017, “Preliminary Geotechnical Investigation, Proposed Residential Remodel and Additions, 32007 South Coast Highway, Laguna Beach, California”; Project No. 72179-04, Report No. 17-8111, dated August 7.
3. Geofirm, 2018, “Response to California Coastal Commission Staff Report Th12b and Supplemental Geotechnical Investigation of Bluff Slope Stability, Emergency and Permanent Slope Repair, 32005 (and 32007) South Coast Highway, Laguna Beach, California”; Project No. 72179-06, Report No. 18-8260R, dated September 12.
4. Geofirm, 2019 “Updated and Supplemental Geotechnical Recommendations for Emergency Slope Repair, 32005 (and 32007) South Coast Highway, Laguna Beach, California”; Project No. 72179-06, Report No. 19-8465, revised dated February 13.
5. Geofirm, 2019, “Geotechnical Update Letter, Proposed Emergency Slope Repair, 32007 (and 32005) South Coast Highway, Laguna Beach, California”; Project No. 72179-06, Report No. 19-8511, dated March 28.
6. Geofirm, 2019, “Final Earthwork Testing and Observation Report, Emergency Slope Repair, 32005 and 32007 South Coast Highway, Laguna Beach, California, Emergency CDP: G-5-19-0011, 32005 Grading Permit No.: RBP-2019-2493, 32007 Grading Permit No.: RBP-2019-2409”; Project No. 72179-10, Report No. 19-8615, dated October 17.
7. Geofirm, 2020, “Response to Geotechnical Report Review Checklist, dated February 26, 2020, Erosion Repair, 32005 and 32007 South Coast Highway, Laguna Beach, California, PN 96044-831”; Project No. 72179-05, Report No. 20-8680, dated March 4.
8. Laguna Beach, City of, 2020, “Geotechnical Report Review Checklist, PN – 96044-831, Erosion Repair”; 5th Review by Kling Consulting Group, Inc., dated February 26.
9. University of California, Santa Barbara, Collection of Historical Aerial Photos, FrameFinder website at http://mil.library.ucsb.edu/ap_indexes/FrameFinder/;

AERIAL PHOTOGRAPHS

UCSB Framefinder

- a. axk_1938_58-41.tif (1938)
- b. c-5925_182.tif (1939)
- c. c-11730_4-82/83/84.tif (1947)
- d. axk_1953, 2k-128 (1952)
- e. c-23870, 82 (1960)
- f. COAST_1961, 6-5-169 (1961)
- g. PAI_OC_65, 251v-72 (1965)
- h. TG_7400, 5-15 (1974)
- i. TG_7700,4-24 (1977)
- j. AMI_OC_81A, 10968 (1981)
- k. ccc_bqk_c, 29-6 (2001)

California Coastal Records Project

- a. 7238102 (1972)
- b. 8703034 (1987)
- c. 200406960 (2004)
- d. 201311286 (2013)
- e. 202421297 (2024)

Eagleview Technology Corporation

- a. CAOran3626CommOrtho4_010504.tif (2001)
- b. CAOran036026CommOrtho45_030509.tif (2003)
- c. CAOran039026NeighOrtho18_050622.tif (2005)
- d. CAORAN069434NeighOrtho14730X_080530.tif (2008)
- e. CAXLNI069434NeighOrtho1776_110124.tif (2011)
- f. CAORAN069434NeighOrtho11830X_141104.tif (2014)
- g. CACLNI069434NeighOrtho0867X_161117.tif (2016)

APPENDIX B

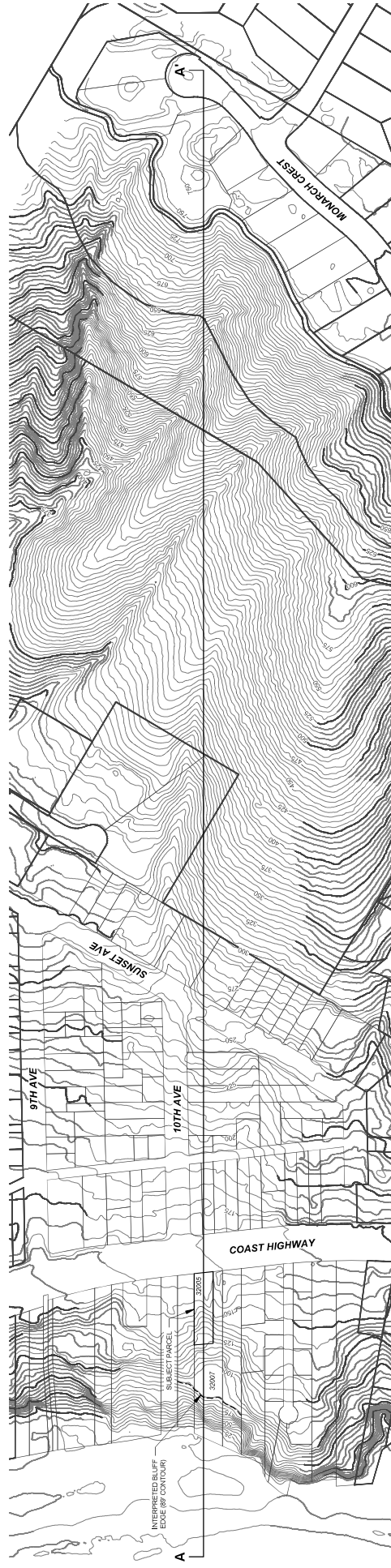
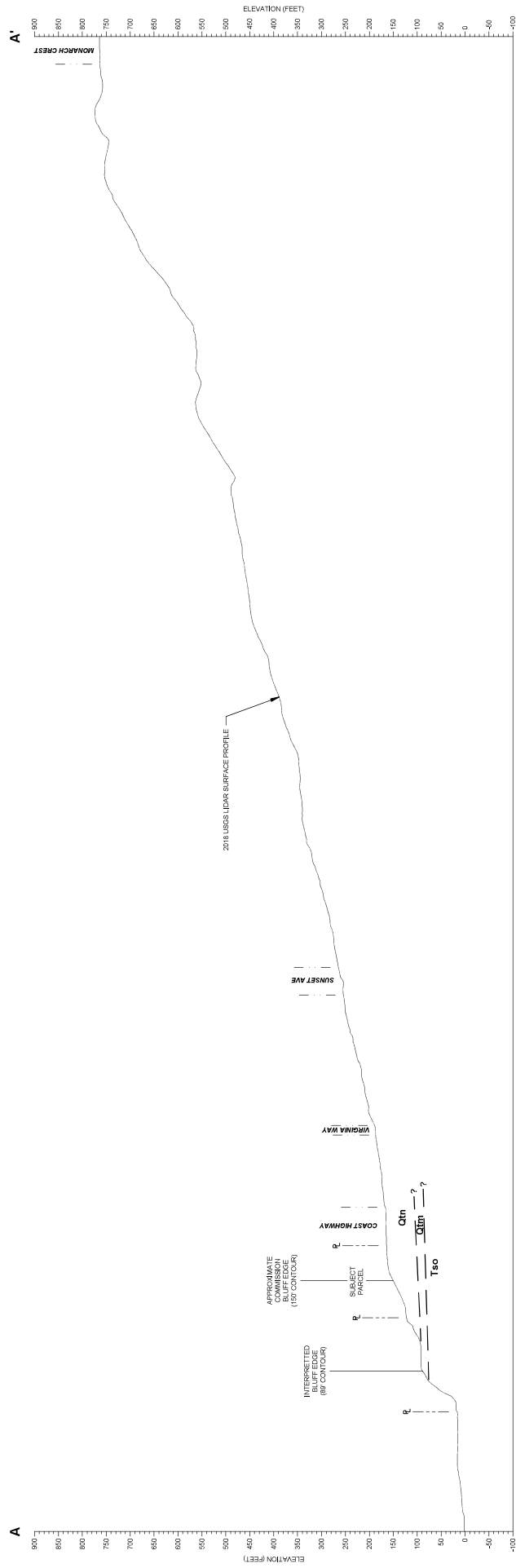
AERIAL IMAGERY

APPENDIX B

AERIAL IMAGERY

Dropbox Link

<https://www.dropbox.com/scl/fo/uh92kqxeyam5je6jzkw6/AGVWQhilM1EmZVUVrcq03Ug?rlkey=hprx1ryfzrrr24pu8s15jiay4&st=lfjtfik8&dl=0>



NOTES

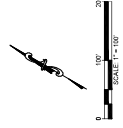
1. PARCEL BOUNDARIES SHOWN ARE FROM COUNTY GIS AND ASSUMED TO BE APPROXIMATE.
2. ELEVATIONS SHOWN ARE FROM 2018 USGS LIDAR-DERIVED RASTER DIGITAL ELEVATION MODEL.
3. THIS MAP IS INTENDED FOR GEOTECHNICAL EVALUATION PURPOSES ONLY. ELEVATIONS AND LOCATIONS SHALL BE CONFIRMED BY A PROFESSIONAL LAND SURVEYOR PRIOR TO ANY ENGINEERING DESIGN.

COORDINATE REFERENCE

PROJECTION: NAD83 (2011) STATE PLANE, CALIFORNIA ZONE VI
VERTICAL DATUM: NAVD88 (US FEET)

EXPLANATION

Qtn	Qtm	Tso	
			NON-MARINE TERRACE DEPOSITS
			MARINE TERRACE DEPOSITS
			BEDROCK: SAN ONOFRE BRECCIA
			LITHOLOGIC CONTACT (QUERIED)



STONEY-MILLER 2018 USGS LIDAR TOPOGRAPHIC MAP AND CROSS-SECTION A-A' **CSOEERB**

**STONEY-MILLER
CONSULTANTS, INC.**

33 JOURNEY, SUITE 200 • ALISO VIEJO, CA 92656 • 949-380-4886

PROJECT: 72179-07

PLATE	1
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PLATE	1
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