

MINUTE ITEM
This Calendar Item No. 29
was approved as Minute Item
No. 29 by the State Lands
Commission by a vote of 3
to 2 at its 4/2/91
meeting.

CALENDAR ITEM

: 29

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PUBLIC AGENCY PERMIT - RIGHT-OF-ENTRY USE

APPLICANT:

City of Del Mar
1050 Camino del mar
Del Mar, California 92014

AREA, TYPE LAND AND LOCATION:

Various parcels located within a strip of tide and submerged
lands located between 18th and 29th streets in the City of
Del Mar, San Diego County.

LAND USE:

Right-of-Entry Use for the demolition and removal of various
structures encroaching on the public beach and the
restoration of the beach.

TERMS OF PROPOSED PERMIT:

Initial period:
Two (2) years beginning April 2, 1991.

Surety bond:
None.

Public liability insurance:
N/A.

Special:

This right-of-entry permit will allow the demolition
and removal of the existing encroachments and the
restoration of the beach. All other development
proposals for the site, including any potential
shoreline protective devices, shall require additional
review by the California Coastal Commission and the
State Lands Commission.

CONSIDERATION:

The public use and benefit; with the State reserving the right at any time to set a monetary rental if the Commission finds such action to be in the State's best interest.

BASIS FOR CONSIDERATION:

Pursuant to 2 Cal. Code Regs. 2003.

STATUTORY AND OTHER REFERENCES:

A. P.R.C.: Div. 6, Parts 1 and 2; Div. 13.

B. Cal. Code Regs.: Title 3, Div. 3; Title 14, Div. 6.

AB 884:

N/A

OTHER PERTINENT INFORMATION:

1. An EIR was prepared and adopted for this project by the City of Del Mar. The City has also adopted, via Resolution 89-56, Exhibit "C", the requisite findings required by the CEQA. The State Lands Commission's staff has reviewed such document.

IMPACT:

Demolition Impacts - the need for the use of heavy construction equipment on the beach for access to the demolition sites and at the demolition site itself.

FINDING:

Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR.

MITIGATION MEASURES:

1. The sandy beach area within the demolition zone will be restored at the end of each work week.
2. Demolition will not occur west of the permitted shoreline protection line between Memorial Day and Labor Day.
3. Demolition hours shall be consistent with the City Noise Ordinance.

FACTS SUPPORTING THE FINDING:

The removal of non-complying walls, patios, other encroachments, and/or revetments will involve the use of heavy equipment. The impacts are of a short term nature and the above mitigation measures will reduce the impact to beach users and residents.

2. A mitigation, monitoring and reporting program has been prepared and adopted by the City of Del Mar.
3. Del Mar has historically been subject to beach encroachments. Over the years, a series of private seawalls, riprap, patios, fences, landscaping, and private stairs have been constructed by property owners to protect structures and to provide useable patio and walkway areas. Much of this development encroaches onto public land and was done with and without the necessary permits. The added riprap and other encroachments have diminished public access to the beach.

In April 1988, the City of Del Mar adopted ordinances, by voter initiative (the Beach Preservation Initiative-BPI), which included policies establishing designs and alignments of new shoreline protective works and provided for the removal of existing encroachments within the beach area delineated in the initiative as the Shoreline Protection Area (SPA). The SPA and the line which identifies its boundaries establish the area where development would be allowed only for public recreational projects and, in certain instances with minimal encroachment, for shoreline protective devices to protect existing development.

The dispute over the legality of the existing beach encroachments resulted in no less than six cases, primarily against the City of Del Mar. The State Lands Commission was among the other defendants in some of these actions. All of these actions were settled last summer when the Commission authorized settlement at its August 22, 1990 meeting. The settlements provided for the proposed actions by the City.

The City of Del Mar is seeking to facilitate the removal of private encroachments located waterward of the SPA line in conformance with the City's BPI ordinance. The City filed two applications to the

CALENDAR ITEM NO. 29 (CONT'D)

California Coastal Commission to expedite the removal. The first application is for the demolition and removal of an existing cement seawall with associated riprap, patio stairs, and landscaping on the public beach for a site located seaward of and adjacent to 1816/34 Ocean Front, Del Mar. The second application includes the demolition and removal of various structures including decks, stairs, seawalls, and riprap located on the public beach seaward and adjacent to selected properties, north of 18th Street and south of 29th Street. Both of these applications were approved by the Coastal Commission.

The City seeks to remove the private patio located at 1836/34 Ocean Front the first week of April, if possible, and has requested staff to expedite this permit.

APPROVALS OBTAINED:

California Coastal Commission permits.

FURTHER APPROVALS REQUIRED:

None.

EXHIBITS:

- A. Land Description
- B. Location Map
- C. City Council Resolution Adopting the Final EIR and CEQA Findings
- D. CEQA Findings

IT IS RECOMMENDED THAT THE COMMISSION:

1. FIND THAT AN EIR WAS PREPARED AND ADOPTED FOR THIS PROJECT BY THE CITY OF DEL MAR AND THAT THE COMMISSION HAS REVIEWED AND CONSIDERED THE INFORMATION CONTAINED THEREIN.
2. ADOPT THE FINDINGS IN EXHIBITS "C" AND "D" WHICH INCLUDE THOSE MADE BY THE CITY OF DEL MAR AND THE COMMISSION, RESPECTIVELY, PURSUANT TO THE REQUIREMENTS OF THE CEQA.
3. AUTHORIZE ISSUANCE TO THE CITY OF DEL MAR OF A TWO-YEAR PUBLIC AGENCY PERMIT - RIGHT-OF-ENTRY USE, BEGINNING APRIL 2, 1991, IN CONSIDERATION OF THE PUBLIC USE AND BENEFIT WITH THE STATE RESERVING THE RIGHT AT ANY TIME TO SET A MONETARY RENTAL IF THE COMMISSION FINDS SUCH ACTION TO BE IN THE STATE'S BEST INTEREST, FOR THE USE OF STATE TIDE

CALENDAR ITEM NO. 29 (CONT'D)

AND SUBMERGED LANDS FOR THE DEMOLITION OF STRUCTURES
ENCROACHING ON THE PUBLIC BEACH AND THE RESTORATION OF THE
BEACH ON THE LANDS DESCRIBED ON EXHIBIT "A" ATTACHED AND BY
REFERENCE MADE A PART HEREOF.

4. AUTHORIZE THE WAIVER OF PROCESSING FEES FOR THIS PROJECT
PURSUANT TO SETTLEMENTS OF LITIGATION AUTHORIZED BY THE
COMMISSION AT ITS AUGUST 22, 1990 MEETING.

EXHIBIT "A"

W 24635

LAND DESCRIPTION

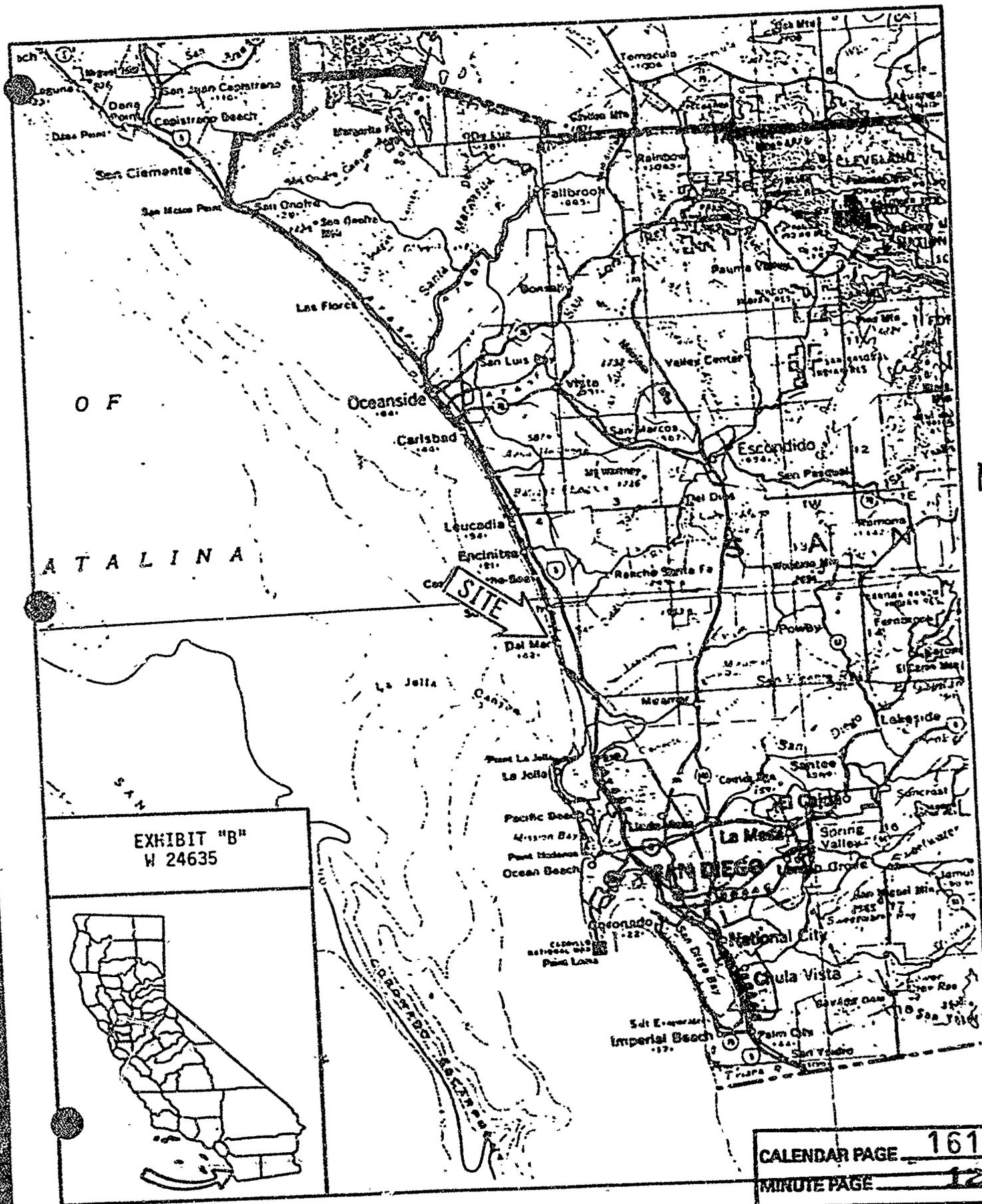
That portion of tide and submerged land along the Pacific Ocean, San Diego County, California,
more particularly described as follows:

That strip of land situated between the mean high tide and the mean low tide lines
lying south of the prolongation of the southerly right-of-way line of 10th Street and
north of the prolongation of the northerly right-of-way line of 29th Street, in the
City of Del Mar, San Diego County.

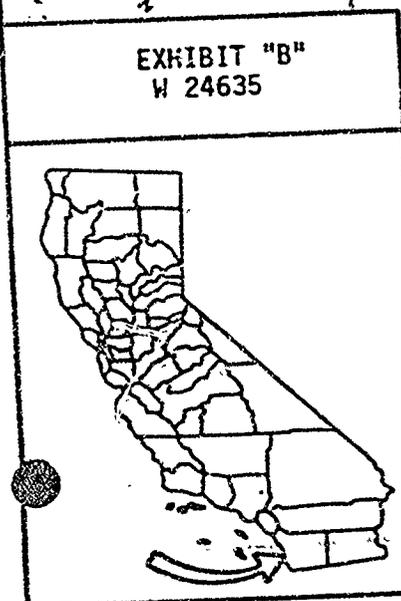
END OF DESCRIPTION

PREPARED MARCH, 1991 BY LLB

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O F
A T A L I N A



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RESOLUTION NO. 89-56

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF DEL MAR, CALIFORNIA, CERTIFYING THE BEACH PRESERVATION INITIATIVE ENVIRONMENTAL IMPACT REPORT AS SUFFICIENT PURSUANT TO THE REQUIREMENTS OF THE CALIFORNIA ENVIRONMENTAL QUALITY ACT.

WHEREAS, the citizens of the City of Del Mar by initiative amended Chapter 30 of the Del Mar Municipal Code establishing a Beach Front Overlay Zone; and

WHEREAS, the Director of the Department of Planning and Community Development of the City of Del Mar ("Planning Director") determined that carrying out the Project could have significant or potentially significant environmental impacts under the California Environmental Quality Act, Public Resources Code Section 21000 et seq ("CEQA"); and

WHEREAS, the certain significant or potentially significant environmental impacts were identified in the initial CEQA study checklist prepared by the Department of Planning and Community Development of the City of Del Mar; and

WHEREAS, notice of preparation of the Draft Environmental Impact Report ("DEIR") was sent to the State Clearinghouse (10 copies), the Office of Planning and Research and all other government agencies having jurisdiction with respect to the project as required by law; and

WHEREAS, the DEIR was prepared by P & D Technologies by order of the Director of Planning and Community Development pursuant to Public Resources Code Sections 21082.1 and 21151; and

WHEREAS, the DEIR addressed those certain significant or potentially significant environmental impacts in the areas of Public Access (pages 22-23), Visual Quality (pages 53-54), Coastal Processes (pages 34-54), and Construction Impacts (pages 55-61); and

WHEREAS, the DEIR concluded that certain impacts which are not significant include, but are not limited to: air quality, police and sheriff protection, fire protection, solid waste, growth inducement, transportation, land-related resources, water supply, and cumulative impacts; and

WHEREAS, a notice of completion was filed with the Del Mar City Clerk and the State Clearinghouse on April 10, 1989 indicating that the DEIR was available for comment, where it was available for review, together with the deadline for review as determined by the State Clearinghouse; and

WHEREAS, public notice of the availability of the DEIR was provided pursuant to Government Code Section 6061 and Public Resources Code Section 21052;

WHEREAS, the Planning Director and Department Staff reviewed comments to the DEIR and with P & D Technologies responded to said comments pursuant to Public Resources Code Section 2153; and

WHEREAS, pursuant to Public Resources Code Section 21100, the City of Del Mar prepared a final Environmental Impact Report ("EIR") consisting of:

1. the DEIR;
2. comments received on the DEIR;
3. responses to comments;
4. a mitigation and monitoring report.

WHEREAS, the final EIR was prepared in conformance with CEQA; and

WHEREAS, the California Environmental Quality Act ("CEQA") and the State CEQA Guidelines require adoption of mitigation measures, or approval of project alternatives reducing impacts to a level of insignificance or the adoption of certain findings and a Statement of Overriding Considerations where significant impacts are identified and remain unmitigated; and

WHEREAS, the comment period closed on May 29, 1989 and after due notice, the City Council held a public hearing on the EIR on August 7, 1989;

WHEREAS, the City Council has reviewed the proposed findings and recommendations, the public written and oral testimony and comments, and the full and complete record of documents, information and evidence submitted.

NOW, THEREFORE, BE IT RESOLVED by the City Council of the City of Del Mar that:

1. The foregoing recitals are true and correct.
2. The final EIR has been completed in compliance with Public Resource Code Section 21000 et seq.; and
3. The final EIR was presented to the City Council and that the City Council reviewed and considered the information contained in the final EIR.

4. The City Council, pursuant to CEQA and the State CEQA Guidelines, makes the following findings based on the facts and evidence which the Council finds are supported by substantial evidence in the record:

The Beach Preservation Initiative Ordinance EIR is an accurate and complete statement of environmental impacts associated with the Initiative/Ordinance, and adequately delineates mitigation measures and alternatives to avoid or substantially lessen the significance of each said impact as summarized in the EIR and more specifically outlined in the Mitigation Monitoring and Reporting Checklist contained in the EIR. The City Council adopts the following mitigation measures in addition to the mitigation measures set forth in the EIR and in the monitoring program. In the event of any conflict, the mitigation measure which is most stringent shall control.

1. Public Access/Beach Encroachment: No Significant Impacts.

A. Explanation and rationale for finding:

The removal of existing encroachments will provide a significant positive impact by increasing the beach area accessible to the public for recreational use. Provided that the Beach Preservation Initiative is implemented the way it is designed and including the approved mitigation measures, no significant impact to public access and no significant new beach encroachment is anticipated because:

- 1) Public access is and will be provided and maintained at street ends. Handicap access will be provided where appropriate.
- 2) The rip rap element of any protective structure will be covered by beach sand at all times.
- 3) New construction will not be permitted to block beach access. To the extent the old "sidewalk" is blocked the limited access it has provided to the public, if any, will be more than offset by increased public access as a result of the pull back of encroachments.

2. Visual Aesthetics: No Significant Impacts.

A. Explanation and rationale for finding:

A positive impact will result directly from the removal of existing encroachments which project further onto the beach than permitted new construction and which in many cases are uncoordinated, poorly built, and unattractive. The return of such area to natural, usable beach land will be an improvement. Project-inherent design mitigation is included within the Initiative itself, which requires consistency with the City Code. In addition, the implementation guidelines require that the Design Review Board review each Shoreline Protection Permit and make a design recommendation to the City Council.

3. Coastal Processes: Potentially Significant Impacts Mitigated to Insignificance.

A. Explanation of impacts and rationale for finding:

The removal of existing encroachments will generally widen the sandy beach area, incrementally reducing sand erosion. However, the potential for offsets in seawall alignments can cause a localized concentration of wave energy resulting in a greater potential for sand erosion. Several non-continuous structures at varying alignments and offsets would have impacts on the shoreline. Potentially significant impacts could also occur if a new wall is constructed too close to the primary structure because of waves overtopping the wall and the effect of pile-driving construction equipment which could be used during construction. However, the City has been advised by its Coastal Engineers that all beach front primary structures can be protected within the confines of the Initiative.

The City of Del Mar has approved the following mitigation measures which would reduce the impacts from construction of shoreline protective structures to below a level of significance. These measures, as appropriate, would be placed as standard conditions of approval on Shoreline Protection Permits to remove existing structures and/or to build a new structure to mitigate site specific and cumulative impacts.

1) Encourage and where appropriate require, construction or reconstruction of walls as part of a continuous line of walls.

2) Provide flank protection in cases where non-continuous walls or offsets or angle points occur, including street ends.

3) If property owners cooperate, develop a schedule with property owners for the timing and location of construction or reconstruction of protective devices, including removal of existing encroachments, at least on a block-by-block basis and within the parameters of the BPI. If property owners do not agree in any particular block, it is recognized that the City cannot force removal of encroachments sooner than required by the BPI and the City cannot force any property owner to build a protective device. Accordingly, in the absence of agreement to a coordinated program further site specific environmental review may be required to review the impacts of an uncoordinated program and to identify additional site specific mitigation measures. It is further recognized, and the Council hereby finds pursuant to CEQA Guidelines Section 15091 (a) (3), that imposition of a mandatory schedule for removal of encroachments other than as specified in the BPI is infeasible as in conflict with existing law and that requiring an owner to build a device who does not wish to do so is infeasible as beyond the City's legal authority.

To the extent that there may remain significant unmitigated impacts, even after further site specific review, as a result of lack of cooperation from private owners, the Council hereby finds, pursuant to CEQA Guidelines Section 15093, that the following benefits of implementation of the BPI outweigh any such potential negative impacts:

A) Removal of existing encroachments as soon as possible will return important public areas to public use;

B) Short and long-term, cumulative protection of beach and sand resources through implementation of the BPI, as soon as possible, will provide important public benefits;

C) Property owners will be benefitted through implementation of the BPI because of cost savings, will be benefitted through the right to use up to five feet of public property for private purposes for those who qualify and, as authorized by the BPI, will be benefitted through the construction of well-designed and engineered protective devices to replace inadequate existing devices, all of which will contribute to the public health, safety, and welfare and the preservation of property values;

D) If one or more owners refuses to cooperate in a given block, the balance of the block and the public in general will be benefitted through timely project implementation for the foregoing reasons and for the reasons stated in the EIR;

E) Adverse impacts of an uncoordinated program will be felt primarily by non-cooperating owners who have the ability to mitigate any such impacts by agreeing to a coordinated program and/or by installing temporary, emergency protection as authorized by the BPI. Impacts to the public from an uncoordinated program can be mitigated incident to removal of encroachments and reconstruction as it occurs, and, in any event, such impacts are expected to be minimal and short-term.

4) Design protective structures to include structural features to minimize wave overtopping.

5) Encourage the use of window shutters designed for hurricane-force winds where practical.

6) Provide toe protection (such as stone and filter cloth) for vertical walls when possible. If not possible, then design wall so that the majority of wave energy is deflected upward and/or so that the wall is stable to the maximum depth of expected toe scour.

7) Provide toe protection for stone revetments (such as toe apron stone with filter cloth).

8) Conduct a geotechnical analysis of sea cliff stability on a site-by-site basis to establish the need for shore protection in the sea cliff regions of section 1 and 3.

9) Setbacks from the SPA line should be established on a site specific basis depending on the potential wave runup and overtopping effect on the proposed shoreline protection structure and the structures behind the protective structure. (In no case will the setback be more than 5 feet west of the SPA line).

4. Construction Impacts: Possible Significant Impacts Mitigated to Insignificance.

A. Explanation of impacts and rationale for finding:

The removal of non-complying walls, patios, other encroachments, and/or revetments, and construction of new walls involve the use of heavy construction equipment. Areas which would be affected include the local streets, the portion of the beach used to access the site and the demolition site itself. These are short-term impacts which would vary by site. The level of disturbance to residents and beach users would be reduced if walls are built on a residential block-by-block basis.

The City of Del Mar has adopted the following mitigation measures which would reduce the impacts from construction of shoreline protective structures to below a level of significance. These measures, as appropriate, would be placed as standard conditions of approval on Shoreline Protection Permits to remove existing structures and/or to build a new structure to mitigate site specific impacts.

1) Construction hours shall be consistent with the City Noise Ordinance Chapter 9.20 of the Municipal Code.

2) The sandy beach area within the construction zone shall be restored at the end of each work week. Notwithstanding statements to the contrary elsewhere, as to this specific measure [item 4A(2)] this provision shall control over any mitigation measure proposed by the EIR.

3) Construction shall not occur west of the permitted shoreline protection line between Memorial Day and Labor Day (except for emergencies).

4) The City will develop a schedule with private property owners for the timing of wall construction so that construction occurs on a block-by-block basis [see item 3A(3) above].

5) The City shall ensure minimization of usurpation of public parking areas during the construction period.

BE IT FURTHER RESOLVED, that the City Council of the City of Del Mar hereby incorporates herein by reference the following evidence which serves as support for the findings herein:

A. All maps, exhibits, written documents, and materials contained in the files regarding this project on record in the City of Del Mar; the written documents referred to herein and the oral presentations given at the hearings. Specifically included by this reference are all portions of the completed Final EIR which describe the environmental impacts and mitigations thereof regarding public access/beach encroachments; visual quality; coastal processes; construction impacts; the discussion of alternatives; the relationship between local short-term uses of man's environment; the maintenance and enhancement of long-term productivity; and significant irreversible environmental changes which would result in the implementation of the EPI.

BE IT FURTHER RESOLVED, that the City Council finds that all potentially significant impacts of the project will be reduced to a level of insignificance provided that the mitigation measures outlined in this Resolution, in the EIR and in the monitoring program are implemented, except as expressly stated to the contrary herein in item 3A(3) and as to that item there is only a possibility of unmitigated impacts, and findings have been made as required by CEQA.

Brooke Eisenberg
BROOKE EISENBERG, Mayor
City of Del Mar

ATTEST:

Patti Barnes
PATTI BARNES, City Clerk

STATE OF CALIFORNIA)
COUNTY OF SAN DIEGO) ss
CITY OF DEL MAR)

I, PATTI BARNES, City Clerk of the City of Del Mar, California, DO HEREBY CERTIFY that the foregoing is a true and correct copy of Resolution No. 89-56 adopted by the City Council of the City of Del Mar, California, at a Regular Meeting held the 21st day of August, 1989, by the following vote:

AYES: Councilmembers Gillies, Hugo, Winterer; Mayor Eisenberg

NOES: None

ABSENT: Councilmember McMillan

ABSTAIN: None

(SEAL)

Patti Barnes
PATTI BARNES, City Clerk

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STATEMENT OF FINDINGS

IMPACT: COASTAL PROCESSES - THE REMOVAL OF EXISTING ENCROACHMENTS HAS THE POTENTIAL FOR OFFSETS IN SEAWALL ALIGNMENTS WHICH CAN CAUSE A LOCALIZED CONCENTRATION OF WAVE ENERGY RESULTING IN A GREATER POTENTIAL FOR SAND EROSION.

FINDING: CHANGES OR ALTERATIONS HAVE BEEN REQUIRED IN, OR INCORPORATED INTO, THE PROJECT WHICH AVOID OR SUBSTANTIALLY LESSEN THE SIGNIFICANT ENVIRONMENTAL EFFECT AS IDENTIFIED IN THE FINAL EIR.

MITIGATION MEASURES:

1. ENCOURAGE AND WHERE APPROPRIATE REQUIRE, CONSTRUCTION OR RECONSTRUCTION OF WALLS AS PART OF A CONTINUOUS LINE OF WALLS. PROVIDE FLANK PROTECTION IN CASES WHERE NON-CONTINUOUS WALLS OR OFFSETS OR ANGLE POINTS OCCUR, INCLUDING STREET ENDS.
2. WITH THE PROPERTY OWNERS COOPERATION, DEVELOP A SCHEDULE FOR THE TIMING AND LOCATION OF CONSTRUCTION OR RECONSTRUCTION OF PROTECTIVE DEVICES, INCLUDING REMOVAL OF EXISTING ENCROACHMENTS ON A BLOCK BY BLOCK BASIS THAT IS CONSISTENT WITHIN THE PARAMETERS OF THE BPI.
3. DESIGN PROTECTIVE STRUCTURES TO INCLUDE STRUCTURAL FEATURES TO MINIMIZE WAVE OVERTOPPING. PROVIDE TOE PROTECTION FOR STONE REVETMENTS (SUCH AS TOE APRON STONE WITH FILTER CLOTH).
4. CONDUCT A GEOTECHNICAL ANALYSIS OF SEA CLIFF STABILITY ON A SITE-BY-SITE BASIS TO ESTABLISH THE NEED FOR SHORE PROTECTION IN THE SEA CLIFF REGIONS.

FACTS SUPPORTING THE FINDING:

THE CONSTRUCTION OF WELL-DESIGNED AND ENGINEERED PROTECTIVE DEVICES TO REPLACE INADEQUATE EXISTING DEVICES IN A COORDINATED BLOCK BY BLOCK APPROACH AS PROVIDED BY THE MITIGATION MEASURES OUTLINED ABOVE WILL MINIMIZE THE POTENTIAL IMPACTS OF LOCALIZED BEACH EROSION. ADDITIONALLY, REMOVAL OF EXISTING ENCROACHMENTS WILL GENERALLY WIDEN THE SANDY BEACH AREA, INCREMENTALLY REDUCING SAND EROSION.

IMPACT: CONSTRUCTION IMPACTS - THE NEED FOR THE USE OF HEAVY CONSTRUCTION EQUIPMENT ON THE BEACH FOR ACCESS TO THE DEMOLITION SITES AND AT THE DEMOLITION SITE ITSELF.

FINDING: CHANGES OR ALTERATIONS HAVE BEEN REQUIRED IN, OR INCORPORATED INTO, THE PROJECT WHICH AVOID OR SUBSTANTIALLY LESSEN THE SIGNIFICANT ENVIRONMENTAL EFFECT AS IDENTIFIED IN THE FINAL EIR.

MITIGATION MEASURES:

1. THE SANDY BEACH AREA WITHIN THE CONSTRUCTION ZONE WILL BE RESTORED AT THE END OF EACH WORK WEEK.
2. CONSTRUCTION WILL NOT OCCUR WEST OF THE PERMITTED SHORELINE PROTECTION LINE BETWEEN MEMORIAL DAY AND LABOR DAY.
3. CONSTRUCTION HOURS SHALL BE CONSISTENT WITH THE CITY NCISE ORDINANCE.

FACTS SUPPORTING THE FINDING:

THE REMOVAL OF NON-COMPLYING WALLS, PATIOS, OTHER ENCROACHMENTS, AND/OR REVETMENTS WILL INVOLVE THE USE OF HEAVY EQUIPMENT. THE IMPACTS ARE OF A SHORT TERM NATURE AND THE ABOVE MITIGATION MEASURES WILL REDUCE THE IMPACT TO BEACH USERS AND RESIDENTS.

EXHIBIT "D"

IMPACT:

Coastal Processes - the removal of existing encroachments has the potential for offsets in seawall alignments which can cause a localized concentration of wave energy resulting in a greater potential for sand erosion.

FINDING:

Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR.

MITIGATION MEASURES:

1. Encourage and where appropriate require, construction or reconstruction of walls as part of a continuous line of walls. Provide flank protection in cases where non-continuous walls or offsets or angle points occur, including street ends.
2. With the property owners cooperation, develop a schedule for the timing and location of construction or reconstruction of protective devices, including removal of existing encroachments on a block by block basis that is consistent within the parameters of the BPI.
3. Design protective structures to include structural features to minimize wave overtopping. Provide toe protection for stone revetments (such as toe apron stone with filter cloth).
4. Conduct a geotechnical analysis of sea cliff stability on a site-by-site basis to establish the need for shore protection in the sea cliff regions.

FACTS SUPPORTING THE FINDING:

The construction of well-designed and engineered protective devices to replace inadequate existing devices in a coordinated block by block approach as provided by the mitigation measures outlined above will minimize the potential impacts of localized beach erosion. Additionally, removal of existing encroachments will generally widen the sandy beach area, incrementally reducing sand erosion.