



M E M O R A N D U M

DATE: June 27, 2014

TO: Theresa Millette, City of San Diego Senior Planner

FROM: Brittney Laver
Coastal Analyst

SUBJECT: **Ocean Beach Community Plan Update Suggested Modifications**

Thank you for the opportunity to review the Draft Ocean Beach Community Plan Update. Following are some suggested policy additions and revisions for your consideration. Commission staff would be available to meet and discuss any of the issue areas addressed by these revisions at your convenience. Language suggested to be added is underlined and language suggested to be deleted is ~~struck out~~.

1. On p. Intro 7, modify Figure 1-2 to show the First Public Roadway extends along Sunset Cliffs Blvd. between Interstate 8 and West Point Loma Blvd.

2. On p. LU 4, add the following goal:

Prioritize lower-cost visitor serving recreation and marine-related development over all other development.

3. On p. LU 11, add the following as recommendation 2.2.7:

Encourage mixed-use development, restricting residential uses to the upper floors with ground-level commercial uses in prime visitor-serving areas.

4. On p. LU 11, add the following as recommendation 2.4.4:

Require new development to be set back and provide buffers as applicable when located adjacent to coastal habitats, open space and park lands.

5. On p. ME 14, modify recommendation 3.5.4 to read:

Implement parking management strategies along streets that serve the commercial and beach areas; however, preferential residential parking programs would require

a Land Use Plan amendment. Refer to Section G of the General Plan's Mobility Element.

6. On p. ME 14, add the following as recommendation 3.5.12:

Ensure adequate off-street parking for all development is always available.

7. On p. UD 6, add the following as recommendation 4.1.12:

Minimize and evaluate the use of night lighting along the shoreline and adjacent to sensitive habitat areas.

8. On p. UD 6, add the following as recommendation 4.1.13:

Encourage the use of special design and window treatments to ensure new developments are bird-safe.

9. On p. UD 6, add the following as recommendation 4.1.14:

Avoid plastic netting in temporary rolled erosion and sediment control products. Alternatives include loose-weave natural fiber netting, erosion control products without netting, and unreinforced silt fences.

10. On p. UD 10, add the following as recommendation 4.3.15:

Encourage mixed-use development, restricting residential uses to the upper floors with ground-level commercial uses in prime visitor-serving areas.

11. On p. UD 16, modify recommendation 4.6.4 to read:

Consider incorporating upper story sun decks or patios, or utilize cross-gabbling on upper stories to align with and protect view corridors. (See Fig. 4.4 and Fig. 4.6)

12. On p. PF 6, modify recommendation 5.2.2 to read:

Install low impact development infrastructure that includes components to capture, minimize, and/or prevent pollutants in urban runoff from reaching the Pacific Ocean and San Diego River.

13. On p. RE 4, add the following goal:

Preserve, protect, and enhance lower-cost visitor serving recreational facilities and overnight accommodations. Mitigation shall be required for any loss of such facilities.

14. On p. RE 10, modify Figure 6-2 to include a MHPA layer and show buffer areas from MHPAs, wetland, and open space areas.

15. On p. RE 15, add the following as recommendation 6.3.11:

Improve the informal trail along the east side of Famosa Slough and develop a bike path to connect Ocean Beach Park and Famosa Slough Open Space.

16. On p. RE 15, add the following as recommendation 6.3.12:

Preserve, protect, and enhance public access within the community. Mitigation shall be required for any loss of public access. Maximize retention of existing on-street public parking for protection of the public beach parking reservoir.

17. On p. RE 16, modify recommendation 6.4.1 to read:

Protect and enhance the natural resources of open space lands by re-vegetating with native, drought-tolerant, non-invasive and environmentally appropriate plants...

18. On p. RE 16, modify recommendation 6.4.4 to read:

...Provide re-vegetation of all areas adjacent to and within the San Diego River with native, drought-tolerant, non-invasive and environmentally appropriate plants.

19. On p. CE 4, add the following goal:

Prepare for sea level rise and climate change impacts by avoiding new bluff development in hazardous locations, properly siting new development to avoid the need for future shoreline protective devices, utilizing adaptation strategies and the best available science, and monitoring sea level rise impacts over time.

20. On p. CE 5, modify the second-to-last paragraph to read:

...More recent regulations require an increased distance of up to forty feet between the bluff face and the development envelope to prevent the need for shoreline armoring. Several property owners have received emergency permits to shore up seawalls and revetments in order to prevent homes from sliding down the bluffs. The California Coastal Act allows repairing or rebuilding seawalls when an existing structure is in imminent danger. Rip rap revetments are discouraged due to their increased encroachments into beach areas. Seawalls are also discouraged as they fix the back of the beach and will prevent public beach access as sea level rise increases over time.

21. On p. CE 6, modify Figure 7-1 to include an ESHA layer and to show areas of sensitive coastal bluffs and buffer areas from sensitive bluffs and ESHA.
22. On p. CE 7, modify 7.1.2 to read:
- ~~Prohibit coastal bluff development, on or beyond the bluff face, except for coastal protective devices, public stairways and ramps that provide access to and from the bluff top to the beach and coastal protective devices~~ when necessary for public access improvements. Require new development to be independently safe without shoreline ~~improvements~~ armoring.
23. On p. CE 7, modify recommendation 7.2.4 to read:
- New development ~~should~~ shall promote, not restrict or prevent, vertical or lateral access to the shoreline, or to and from recreational areas.
24. On p. CE 7, add the following as recommendation 7.2.5:
- Establish requirements for retrofit and/or relocation of public access sites at risk of sea level rise impacts.
25. On p. CE 7, add the following as recommendation 7.2.6:
- Incorporate sea level rise into a comprehensive beach management strategy.
26. On p. CE 9, modify the Erosion introductory paragraph to read:
- ...Bluff erosion is proceeding in a non-uniform rate, with certain areas experiencing more than others, and will continue to accelerate with sea level rise.
27. On p. CE 9, modify recommendation 7.3.1 to read:
- Setback new development and redevelopment on property containing a coastal bluff a sufficient distance so the structure is safe from geologic and other hazards for its economic life, at least 40 feet from the bluff edge. This setback may be reduced to not less than 25 feet if evidence is provided that indicates the site is stable enough to support the development for its economic life and without requiring construction of shoreline protective devices. Do not allow a bluff edge setback less than 40 feet if erosion control measures or shoreline protective devices exist on the sites which are necessary to protect the existing principal structure in danger from erosion and do not assume retention of such structures when calculating bluff setback requirements. Incorporate sea level rise projections into calculations for determining the bluff edge setback.
28. On p. CE 9, modify recommendation 7.3.4 to read:

Allow the placement of shoreline protective ~~works~~ devices, such as concrete seawalls, revetments and parapets, only when required to serve coastal-dependent uses or when there are no other feasible means, a complete alternatives analysis has been done and it is the least environmentally damaging option to protect existing principal structures, such as homes, in danger from erosion. Such devices shall only be authorized for specific time periods depending on the nature of the proposed project, and shall be removed when the structures it is authorized to protect are demolished or redeveloped.

29. On p. CE 9, add the following as recommendation 7.3.6:

Require a waiver of rights to future shoreline protection for any new shoreline development or redevelopment. New development and redevelopment shall not rely on existing or future shoreline protective devices.

30. On p. CE 9, add the following as recommendation 7.3.7:

Shoreline protective devices shall be tied to the economic life of the structure they are protecting and shall be removed when the structure it is authorized to protect is demolished or redeveloped. Shoreline armoring, if allowed, shall include mitigation for impacts to shoreline sand supply and public access and recreation. Mitigation may be assessed in 20-year increments, starting at the building permit certification date.

31. On p. CE 9, add the following as recommendation 7.3.8:

Avoid development and redevelopment in potentially hazardous areas without findings that the area is safe for development, the development will not create a hazard or diminish the stability of the area, and the development will not require a shoreline protective device.

32. On p. CE 10, modify recommendation 7.4.6 to read:

Allow new construction within floodplain areas only in accordance with adopted development regulations and proper setbacks and buffer areas from wetland areas.

33. On p. CE 10, add the following as recommendation 7.4.7:

Maximize open space and native landscaping on lots subject to new development or redevelopment to promote runoff infiltration and reduce runoff pollution.

34. On p. CE 12, add the following as recommendation 7.5.9:

Install additional recycling bins on sidewalks in high-use areas.

35. On p. CE 12, add the following as recommendation 7.5.10:

Encourage all new development and redevelopment to pursue LEED certification standards.

36. On p. CE 12, add the following as recommendation 7.5.11:

Encourage the use of native, drought-tolerant landscaping to reduce water usage.

37. On p. CE 13, modify recommendation 7.6.3 to read:

Public and private project proponents ~~should~~ shall, using best available science and site-specific geotechnical reports, assess their projects for its vulnerability to impacts from sea level rise and, if vulnerable, propose a reasonable adaptation strategy. Reasonable adaptation strategies shall not rely on shoreline protective devices.

38. On p. CE 13, add the following as recommendation 7.6.5:

Develop an incentive program to relocate existing development that is at risk from bluff erosion or failure. Re-siting and/or redeveloping existing endangered development shall be prioritized over construction of shoreline protective devices.

39. On p. CE 13, add the following as recommendation 7.6.6:

Property owners shall assume risks associated with new development in hazardous areas and shall waive all rights to future shoreline protective devices.

40. On p. CE 13, add the following as recommendation 7.6.7:

Identify feasible locations where existing houses could be moved or a plan to abandon and remove houses at risk from bluff erosion or failure. Convert areas vulnerable to sea level rise impacts into open space.

41. On p. HP 5, add the following as recommendation 9.1.12:

All new development or improvements to an existing structure 45 years or older shall go through the City's Historic Review process.

42. On the first page of Appendix D, modify Figure D-1 to show the First Public Roadway extends along Sunset Cliffs Blvd. between Interstate 8 and West Point Loma Blvd.

43. In Appendix D (or elsewhere as appropriate), add a figure that maps the current and projected future hazard areas, identifying current bluff erosion rates and projected future bluff erosion rates.