SCALE: 1"=20'

0 10 20 40

FEET

LEGEND

20 → PHOTO NUMBER AND APPROXIMATE ORIENTATION AND DIRECTION

OCEAN FRONT ST. (ALLEY)

PROPERTY LINE

1415 OCEAN FRONT ST.

1409 OCEAN FRONT ST.

4820 POINT LOMA AVE.

EXISTING TIED-BACK SHOTCRETE WALL

PROPERTY LINE (TYP.)

EXISTING CONCRETE SEAWALL

VOID

VOID

VOID

EXISTING BROKEN CONCRETE & FORMATIONAL FRAGMENTS

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20

TerraCosta Consulting Group

TERRACOSTA CONSULTING GROUP
ENGINEERS AND GEOLOGISTS
3890 MURPHY CANYON ROAD, SUITE 200
SAN DIEGO, CA 92123 (858) 573-6900

FIGURE NUMBER: 1

PROJECT NAME: 1409 OCEAN FRONT STREET

PROJECT NUMBER: 3002

PHOTO LOCATION MAP

Photo 1

Photo 2

Photo 3

Photo 4

Photo 5

Photo 6

Photo 7

Photo 8

Photo 9

Photo 10

Photo 11

Photo 12

Photo 13

Photo 14

Photo 15

Photo 16
12/04/2017

Photo 17

Photo 18

Photo 19

Photo 20

1409 OCEAN FRONT SEAWALL
CITY OF SAN DIEGO PTS 611484

PHOTO - Pre-Construction

1409 OCEAN FRONT SEAWALL
CITY OF SAN DIEGO PTS 611484

PHOTO SIMULATION - Post-Construction

The City of SAN DIEGO

Development Services Department
Project Submittal & Management Division

December 23, 2018

VIA EMAIL: wcrampton@terracosta.com

Walter Crampton
Terracosta Consulting Group
3890 Murphy Canyon Rd.
San Diego, CA 92107

Subject: 1409 Ocean Front Seawall, Assessment Letter; Project No. 611484; Internal Order No. 24007927; Ocean Beach Community Plan.

Dear Mr. Freeman:

The Development Services Department (DSD) has completed the initial review of the project referenced above and described as a Coastal Development Permit (CDP) and Site Development Permit (SDP), amendment CDP No. 298341 and SDP No. 298427, for the construction of secant pile seawall landward of existing concrete seawall, minor grading, and landscaping at 1409 Ocean Front. The 0.08-acre site is in the RM-2-4, Coastal Height Limit, Coastal (Appealable Area), the First Public Roadway, the Ocean Beach Cottage Emerging Historic District, the Parking Impact (Beach Impact Area), and the Residential Tandem Parking Overlay Zones within the Ocean Beach Community Plan area.

Enclosed is a Cycle Issues Report (Enclosure 1) which contains review comments from staff representing various disciplines. The purpose of this assessment letter is to summarize the significant project issues and identify a course of action for the processing of your project.

If any additional requirements should arise during the subsequent review of your project, we will identify the issue and the reason for the additional requirement. To resolve any outstanding issues, please provide the information that is requested in the Cycle Issues Report. If you choose not to provide the requested additional information or make the requested revisions, processing may continue. However, the project may be recommended for denial if the remaining issues cannot be satisfactorily resolved and the appropriate findings for approval cannot be made.

The DSD will generally formulate a formal recommendation for your project subsequent to completion of the following milestones: 1) After the City Council recognized Community Planning Group has provided a formal project recommendation; 2) After all City staff project-review comments have been adequately addressed; and 3) During the final stages of the environmental review process.

As your Development Project Manager, I will coordinate all correspondence, emails, phone calls, and meetings directly with the applicants assigned "Point of Contact." The addressee on this letter has been designated as the Point of Contact for your project. Please notify me if you should decide to change your Point of Contact while I am managing this project.

I. REQUIRED APPROVALS/FINDINGS: Your project as currently proposed requires the processing of a Process Three, CDP and SDP for development on environmentally sensitive lands (sensitive coastal bluff and coastal beach. Consistent with the San Diego Municipal Code (SDMC) Section 112.0103, when an applicant applies for more than one permit, map, or other approval for a single development, the applications will be consolidated for processing and shall be reviewed by a single decision maker at the highest level of authority for that development. Therefore, the project as proposed would require a Process Three, Hearing Officer decision with appeal rights to the Planning Commission.

In order to recommend approval of your project, certain findings must be substantiated in the record. Your latest submitted draft findings did not include the below Tentative Map findings. Consider each finding as a question and provide the responses to each by answering each question specifically**. Please provide your draft findings on a CD-ROM diskette(s) in a word.docx format with your next submittal**.

(a) <u>Finding for all Coastal Development Permits</u>

(1) The proposed coastal development will not encroach upon any existing physical accessway that is legally used by the public or any proposed public accessway identified in a Local Coastal Program land use plan; and the proposed coastal development will enhance and protect public views to and along the ocean and other scenic coastal areas as specified in the Local Coastal Program land use plan;

(2) The proposed coastal development will not adversely affect environmentally sensitive lands;

(3) The proposed coastal development is in conformity with the certified Local Coastal Program land use plan and complies with all regulations of the certified Implementation Program; and

(4) For every Coastal Development Permit issued for any coastal development between the nearest public road and the sea or the shoreline of any body of water located within the Coastal Overlay Zone the coastal development is in conformity with the public access and public recreation policies of Chapter 3 of the California Coastal Act.

(a) Findings for all Site Development Permits

(1) The proposed development will not adversely affect the applicable land use plan;

(2) The proposed development will not be detrimental to the public health, safety, and welfare; and

(3) The proposed development will comply with the regulations of the Land Development Code including any allowable deviations pursuant to the Land Development Code.

(b) Supplemental Findings--Environmentally Sensitive Lands

(1) The site is physically suitable for the design and siting of the proposed development and the development will result in minimum disturbance to environmentally sensitive lands;

(2) The proposed development will minimize the alteration of natural land forms and will not result in undue risk from geologic and erosional forces, flood hazards, or fire hazards;

(3) The proposed development will be sited and designed to prevent adverse impacts on any adjacent environmentally sensitive lands;

(4) The proposed development will be consistent with the City of San Diego's Multiple Species Conservation Program (MSCP) Subarea Plan and Vernal Pool Habitat Conservation Plan (VPHCP);

(5) The proposed development will not contribute to the erosion of public beaches or adversely impact local shoreline sand supply; and

(6) The nature and extent of mitigation required as a condition of the permit is reasonably related to, and calculated to alleviate, negative impacts created by the proposed development.

II. **SIGNIFICANT PROJECT ISSUES:** As noted previously, the significant project issues are provided in the Cycle Issues Report. Resolution of these issues could affect your project. Please carefully review the City staff comments and respond accordingly.

III. **STUDIES/REPORTS REQUIRED:** A number of documents have been identified as necessary to the project's review. Reference the attached Submittal Requirements Report (Enclosure 2).

IV. **PROJECT ACCOUNT STATUS:** Our current accounting system does not provide for real-time information regarding account status and majority of the recent City staff charges ***have not***

been posted on the account. However, our latest data indicates you have $12,900.00 remaining in your deposit trust account.

During the processing of your project, you will continue to receive monthly statements with the break-down of staff charges to your account. The minimum balance required for a Coastal Development Permit application is $5,000.00, https://www.sandiego.gov/sites/default/files/dsdib503.pdf. To avoid project delays due to insufficient account funds, please ensure that your deposit account maintains the minimum account balance at all times.

For your convenience, deposits can be made anytime online through Open DSD, http://www.sandiego.gov/development-services/opendsd/, and by entering your project number in the "Project ID" field, http://opendsd.sandiego.gov/web/approvals/. Also, any invoices can be paid online by searching for the invoice number, http://opendsd.sandiego.gov/web/invoices/ or in person at the Cashier, located on the 3rd Floor of the Development Services Center.

V. **TIMELINE:** Upon your review of the attached Cycle Issues Report, you may wish to schedule a meeting with staff and your consultants prior to resubmitting the project. Please telephone me if you wish to schedule a meeting with staff. During the meeting, we will also focus on key milestones that must be met in order to facilitate the review of your proposal and to project a potential timeline for a hearing date. Your next review cycle should take approximately 20 days to complete.

Municipal Code Section 126.0114 requires that a development permit application be closed if the applicant fails to submit or resubmit requested materials, information, fees, or deposits within 90 calendar days. Once closed, the application, plans and other data submitted for review may be returned to the applicant or destroyed. To reapply, the applicant shall be required to submit a new development permit application with required submittal materials, and shall be subject to all applicable fees and regulations in effect on the date the new application is deemed complete.

If you wish to continue processing this project, please note that delays in resubmitting projects and/or responding to City staff's inquiries negatively impact this Department's ability to effectively manage workload, which can lead to both higher processing costs and longer timelines for your project.

VI. **RESUBMITTALS/NEXT STEPS:** Project re-submittals are done on a walk-in basis. Please check-in on the third floor of the Development Service Center (1222 First Avenue) to be placed on the list for the submittal counter. **Project re-submittals directly to the Development Project Manager will not be accepted.** Please be prepared to provide the following:

A. Plans and Reports: Provide the number of sets of plans and reports as shown on the attached Submittal Requirements Report. The plans should be folded to an approximate 8½ x 11-inch size.

B. Response to Cycle Issues Report: Prepare a cover letter that specifically describes how you have addressed each of the issues identified in the Cycle Issues Report and any issues identified in this cover letter, if applicable. Or, you may choose to simply submit the Cycle Issues Report, identifying within the margins how you have addressed the issue. If the issue is addressed on one or more sheets of the plans or the reports, please reference the plan, sheet number, report or page number as appropriate. If it is not feasible to address a particular issue, please indicate the reason. Include a copy of this Assessment Letter, Cycle Issues Report and your response letter if applicable, with each set of plans.

VII. COMMUNITY PLANNING GROUP: Staff provides the decision maker with the recommendation from your locally recognized community planning group. If you have not already done so, please contact Andrea Schlageter, Chair of the Ocean Beach Planning Board at aeschlag@gmail.com, to schedule your project for a recommendation from the group. If you have already obtained a recommendation from the community planning group, in your resubmittal, if applicable, please indicate how your project incorporates any input suggested to you by the community planning group.

Information Bulletin 620, "Coordination of Project Management with Community Planning Committees" (available at http://www.sandiego.gov/development-services), provides some valuable information about the advisory role the Community Planning Group. Council Policy 600-24 provides standard operating procedures and responsibilities of recognized Community Planning Committees and is available at http://www.sandiego.gov/city-clerk/officialdocs/index.shtml.

VIII. STAFF REVIEW TEAM: Should you require clarification about specific comments from the staff reviewing team, please contact me, or feel free to contact the reviewer directly. The names and telephone numbers of each reviewer can be found on the enclosed Cycle Issues Report.

IX. PROJECT ISSUE RESOLUTION CONFERENCE: Project Issue Resolution (PIR) conferences provide customers an opportunity to have issues heard and considered by executive department management. A PIR will be considered if, after the issuance of the third Assessment Letter for discretionary projects, customers and staff have been unable to resolve project issues. The PIR would address issues such as disagreements between the applicant and staff on interpretations of codes or ordinances, requests for additional information or studies, or project-related processing requirements. Any determinations from a PIR are not binding on any City decision-making body, such as City Council, Planning Commission, or Hearing Officer. Qualifying PIR requests should be coordinated with your Development Project Manager.

In conclusion, please note that information forms and bulletins, project submittal requirements, and the Land Development Code may be accessed on line at http://www.sandiego.gov/development-services. Many land use plans for the various communities throughout the City of San Diego are now available on line at http://www.sandiego.gov/planning/community/profiles/index.shtml.

Open DSD: To view project details online, visit: http://www.sandiego.gov/development-services/opendsd/.

For modifications to the project scope, submittal requirements or questions regarding any of the above, please contact me prior to resubmittal. I may be reached by telephone at (619) 446-5375 or via e-mail at mblake@sandiego.gov.

Sincerely,

for

Martha Blake
Development Project Manager

Enclosures:

1. Cycle Issues Report
2. Submittal Requirements Reports
3. Coastal Commission Letter dated Aug. 31, 2018

cc: File
Chair of the Ocean Beach Planning Board
CA Coastal Commission, San Diego Office
Reviewing Staff

Cycle Issues

THE CITY OF SAN DIEGO
Development Services Department
1222 First Avenue, San Diego, CA 92101-4154

L64A-003A

Project Information

Project Nbr: **611484** **Title:** 1409 Ocean Front Seawall
Project Mgr: Daly, Tim (619) 446-5356 TPDaly@sandiego.gov

Review Information

Cycle Type:	5 Submitted (Multi-Discipline)	**Submitted:**	07/26/2018	Deemed Complete on 07/27/2018
Reviewing Discipline:	Plan-Historic	**Cycle Distributed:**	07/27/2018	
Reviewer:	**Anthony, Shannon**	**Assigned:**	07/31/2018	
	(619) 533-6301	**Started:**	08/08/2018	
	Santhony@sandiego.gov	**Review Due:**	08/24/2018	
Hours of Review:	1.00	**Completed:**	08/08/2018	**COMPLETED ON TIME**
Next Review Method:	Submitted (Multi-Discipline)	**Closed:**	12/23/2018	

. The review due date was changed to 09/06/2018 from 08/29/2018 per agreement with customer.
. The reviewer has indicated they want to review this project again. Reason chosen by the reviewer: First Review Issues.
. We request a 2nd complete submittal for Plan-Historic on this project as: Submitted (Multi-Discipline).
. The reviewer has requested more documents be submitted.
. Your project still has 4 outstanding review issues with Plan-Historic (all of which are new).
. Last month Plan-Historic performed 277 reviews, 97.5% were on-time, and 96.2% were on projects at less than < 3 complete submittals.

20180808

Cleared?	Issue Num	Issue Text
☒	1	The property located at 1409 Ocean Front Street, is not an individually designated resource and is not located within a designated historic district. However, San Diego Municipal Code Section 143.0212 requires City staff to review all projects impacting a parcel that contains a structure 45 years old or older to determine whether a potentially significant historical resource exists on site prior to issuance of a permit. (Info Only, No Response Required) (New Issue)
☒	2	During this review buildings are evaluated for eligibility under local designation criteria. The designation criteria and guidelines for their application can be found on the City's website: http://www.sandiego.gov/planning/programs/historical/pdf/201102criteriaguidelines.pdf (Informational Only; No Response or Action Required) (New Issue)
☒	3	More information regarding this review process can be found in Information Bulletin 580: http://www.sandiego.gov/development-services/pdf/industry/infobulletin/ib580.pdf (Informational Only; No Response or Action Required) (New Issue)
☒	4	If City staff determines after review of these documents that no potentially significant historical resource exists on site, the parcel will be exempt from further historical review for five years from this date unless new information is provided that speaks to the building's eligibility for designation. (Informational Only; No Response or Action Required) (New Issue)
☒	5	If City staff determines that a potentially significant historical resource exists on the site, all modifications and additions will be evaluated to determine consistency with the Secretary of the Interior's Standards for Treatment of Historic Properties (Standards). If the proposed project is consistent with the Standards, the permit process may proceed and the parcel will require additional review for all future modifications. (continued...) (New Issue)
☒	6	(...continued) If the proposed project is not consistent with the Standards, the applicant may redesign the project or prepare a historic report that evaluates the building's integrity and eligibility under all designation criteria. (Informational Only; No Response or Action Required) (New Issue)
☒	7	Staff has reviewed the photos; water and sewer records. In addition, staff has considered any input received through applicable public noticing and outreach and have made the following determination: (New Issue)
☐	8	Staff cannot make a determination with the information provided. Please provide the following documents: (New Issue)

For questions regarding the 'Plan-Historic' review, please call Shannon Anthony at (619) 533-6301. Project Nbr: 611484 / Cycle: 5

Cleared?	Issue Num	Issue Text
☐	9	A complete copy of the Assessor's Building Record must be provided. This document is available at the County Assessor's Office and includes information such as the date of construction, materials, date of alterations, and a dimensioned footprint of the building and subsequent additions. The owner's written consent is required in order to obtain this document from the County. (New Issue)
☐	10	Discretionary projects are required to submit all documentation identified in Information Bulletin 580, Section II.D. Please review the Bulletin and provide all documentation not provided with this submittal, including: [[delete those that don't apply]] written description of the property including architectural style, materials, features, setting & related structures; written description of any alterations including dates & the architect/builder associated with the alterations; Notice of Completion; Chain of Title; City Directory listing of occupants; historic photographs; and Sanborn Maps. (New Issue)
☐	11	Please resubmit the additional information and plansto the Development Services Department for routing and review. Should you have any questions regarding these comments, please contact the "Reviewer" listed in bold at the top of this cycle issues report. (New Issue)

THE CITY OF SAN DIEGO
Development Services Department
1222 First Avenue, San Diego, CA 92101-4154

L64A-003A

Review Information

Cycle Type:	5 Submitted (Multi-Discipline)	**Submitted:**	07/26/2018	Deemed Complete on 07/27/2018
Reviewing Discipline:	LDR-Geology	**Cycle Distributed:**	07/27/2018	
Reviewer:	**Thomas, Patrick**	**Assigned:**	07/27/2018	
	(619) 446-5296	**Started:**	08/16/2018	
	pathomas@sandiego.gov	**Review Due:**	08/24/2018	
Hours of Review:	4.00	**Completed:**	08/22/2018	**COMPLETED ON TIME**
Next Review Method:	Submitted (Multi-Discipline)	**Closed:**	12/23/2018	

. The review due date was changed to 09/06/2018 from 08/29/2018 per agreement with customer.
. The reviewer has indicated they want to review this project again. Reason chosen by the reviewer: First Review Issues.
. We request a 2nd complete submittal for LDR-Geology on this project as: Submitted (Multi-Discipline).
. The reviewer has requested more documents be submitted.
. Your project still has 16 outstanding review issues with LDR-Geology (all of which are new).
. Last month LDR-Geology performed 77 reviews, 89.6% were on-time, and 67.6% were on projects at less than < 3 complete submittals.

611484-5 (8/22/2018)

Information

Cleared?	Issue Num	Issue Text
☐	1	The project site is located within geologic hazards zone 43 as shown on the City's Seismic Safety Study Geologic Hazards Maps. Zone 43 is characterized by coastal bluffs, generally unstable, unfavorable jointing, local high erosion. (New Issue)

References

Cleared?	Issue Num	Issue Text
☐	2	Geotechnical Basis of Design, Sea Wall Rehabilitation, 1409 Ocean Front Street, San Diego, California, prepared by TerraCosta Consulting Group, dated June 22, 2018 (their project no. 3002) Development Permit Plans: Coastal Bluff Stabilization, 1409 Ocean Front Street, San Diego, California, prepared by TerraCosta Consulting Group, dated July 25, 2018. (New Issue)

Comments

Cleared?	Issue Num	Issue Text
☐	3	Edge of Bluff: The mapped bluff edge shown on Figure 2 deviates from the 25 foot (MSL) topographic contour on the SW portion of the site. Please explain this deviation. (New Issue)
☐	4	Please indicate the bluff edge and principal residence on the cross sections (Figures 3, 3A, 4 and 4A). (New Issue)
☐	5	Please add a geologic cross section along the existing concrete wall to remain, including the bluff edge and the relationship between the existing concrete wall to remain, existing tied back concrete wall and the proposed secant pile wall. (New Issue)
☐	6	The cross-sections must match the site plan and include all geologic information. Geologic units including fill soils and lot improvements must be shown and labeled. Fill distribution and thickness should be based on subsurface investigation by the consultant. (New Issue)
☐	7	The geotechnical consultant should consider revising their description of geologic units in accordance with the recent Geologic Map of the San Diego Quadrangle (2008). http://www.quake.ca.gov/gmaps/RGM/sandiego/sandiego.html (New Issue)
☐	8	Bluff Stability: Clarify if the provided stability analyses demonstrates that the proposed project will provide adequate slope stability for the primary (principal) structure at 1409 Ocean Front following completion of the proposed project. (New Issue)
☐	9	Clarify if the material parameters are representative of site conditions and appropriate for use in the slope stability analyses. (New Issue)
☐	10	The geotechnical consultant may consider providing a map with sample locations, logs, and laboratory test data. Describe the lithologies and indicate if they are the same as at the project site. (New Issue)
☐	11	Please explain whether or not a pieziometric surface should be used in the global stability analysis used to evaluate coastal bluff stability at the site. (New Issue)

For questions regarding the 'LDR-Geology' review, please call Patrick Thomas at (619) 446-5296. Project Nbr: 611484 / Cycle: 5

Cleared?	Issue Num	Issue Text
☐	12	Clarify if the proposed project is necessary to protect the existing primary structures (per SDMC 143.0130 and 143.0143(g)(1)). If this is the case, provide an analysis of bluff recession (retreat) rates and stability of the subject property to demonstrate this claim, according to accepted professional standards. (New Issue)
☐	13	The geotechnical consultant could consider comparing topography from the Sunset Cliffs Shoreline and Upper Cliffs Stabilization Project (Work Order No. 117071; Drawing No. D-19990) with the current site topography. (New Issue)
☐	14	It should be noted that the geotechnical consultant for the project on the adjacent property to the south has determined an unprotected bluff recession rate of 10 to 12 inches per year. (New Issue)
☐	15	Construction Impacts: The geotechnical consultant must comment whether or not the proposed development as recommended will measurably destabilize neighboring properties or induce the settlement of adjacent structures. (New Issue)
☐	16	A project has been recently submitted for a proposed seawall south and adjacent to the subject project. The neighboring applicants could consider coordinating their designs to incorporate the natural character of the bluff face and landform characteristics into the design pursuant to the SDMC and Ocean Beach Community Plan and Local Coastal Program (Section 7.3.4). (New Issue)

Review Information

Cycle Type:	5 Submitted (Multi-Discipline)	**Submitted:**	07/26/2018	Deemed Complete on 07/27/2018
Reviewing Discipline:	LDR-Landscaping	**Cycle Distributed:**	07/27/2018	
Reviewer:	**Hunt, Frank**	**Assigned:**	08/02/2018	
	(619) 446-5198	**Started:**	09/24/2018	
	Fhunt@sandiego.gov	**Review Due:**	08/24/2018	
Hours of Review:	4.00	**Completed:**	09/24/2018	**COMPLETED LATE**
Next Review Method:	Submitted (Multi-Discipline)	**Closed:**	12/23/2018	

. The review due date was changed to 09/06/2018 from 08/29/2018 per agreement with customer.
. The reviewer has indicated they want to review this project again. Reason chosen by the reviewer: First Review Issues.
. We request a 2nd complete submittal for LDR-Landscaping on this project as: Submitted (Multi-Discipline).
. The reviewer has requested more documents be submitted.
. Your project still has 7 outstanding review issues with LDR-Landscaping (all of which are new).
. Last month LDR-Landscaping performed 37 reviews, 83.8% were on-time, and 32.4% were on projects at less than < 3 complete submittals.

1st Review

Cleared?	Issue Num	Issue Text
☐	1	Project Scope: OCEAN BEACH (Process 3) Amend Coastal Development Permit 298341 & Site Development Permit 298427 for the construction of secant pile seawall landward of existing concrete seawall, minor grading & landscaping at 1409 Ocean Front St. The 0.08-acre site is in the RM-2-4 zone, Coastal (Appealable) and 1st Public Rdwy overlay zones within the Ocean Beach Community Plan area. This project is subject to the following landscape regulations SDMC 142.0403, 143.0143, and 143.0110. (New Issue)
☐	2	Reference Material: To provide a comprehensive evaluation of the proposed work additional information is needed. Provide the Exhibit 'A' from permit No. 92696. (New Issue)
☐	3	Plan Consistency, Site Walls, Stairs, ETC (Sht. C-2): The proposed Site Plan and Landscape Plan have inconsistent information. Are the 3'-6" site walls being shown on the Landscape Plan existing or proposed? Identify the site walls on the project's Site Plan. Note that when Bluff Edge is determined the site walls may need to be adjusted to conform to the 40 feet setback from the Coastal Bluff Edge. (New Issue)
☐	4	Plan Consistency, Secant Wall (Sht. L1.0): Identify the proposed Secant Wall on the Landscape Plan. Provide labels for all existing/proposed structures within the project's limit of work. (New Issue)
☐	5	Plant Palette [Info Only]: The proposed plants conform 143.0143(C) only native or other drought-tolerant plant species are being proposed with this project. (New Issue)
☐	6	Temp. Irrigation (Sht. L2.0): Once established the proposed Drosanthemum floribundum will not need suplamental irrigation to thrive. In accordance with the Coastal Bluffs and Beaches Guidelines Section 2, B, Landscape staff recommends providing temporary above grade irritation in all areas proposing Drosanthemum floribundum. Update the proposed irrigation plan accordingly. (New Issue)
☐	7	Irrigation Drainage (Sht. L2.0): In accordance with SDMC 143.0143 all drainage shall be directed away from any coastal bluff. Graphicly and with labels identify the direction the irrigation will drain. (New Issue)

For questions regarding the 'LDR-Landscaping' review, please call Frank Hunt at (619) 446-5198. Project Nbr: 611484 / Cycle: 5

Review Information

Cycle Type:	5 Submitted (Multi-Discipline)	**Submitted:**	07/26/2018	Deemed Complete on 07/27/2018
Reviewing Discipline:	LDR-Planning Review	**Cycle Distributed:**	07/27/2018	
Reviewer:	**Lizzi, Philip**	**Assigned:**	07/31/2018	
	(619) 446-5159	**Started:**	08/22/2018	
	plizzi@sandiego.gov	**Review Due:**	09/06/2018	
Hours of Review:	5.00	**Completed:**	08/30/2018	**COMPLETED ON TIME**
Next Review Method:	Submitted (Multi-Discipline)	**Closed:**	12/23/2018	

. The review due date was changed to 09/06/2018 from 08/29/2018 per agreement with customer.
. We request a 2nd complete submittal for LDR-Planning Review on this project as: Submitted (Multi-Discipline).
. The reviewer has requested more documents be submitted.
. Your project still has 24 outstanding review issues with LDR-Planning Review (all of which are new).
. Last month LDR-Planning Review performed 88 reviews, 86.4% were on-time, and 37.1% were on projects at less than < 3 complete submittals.

Project / Community Plan

Cleared?	Issue Num	Issue Text
☐	1	Amend Coastal Development Permit 298341 & Site Development Permit 298427 for the construction of secant pile seawall landward of existing concrete seawall, minor grading & landscaping at 1409 Ocean Front Street. The 0.08-acre site is located within the RM-2-4 zone, the Coastal Height Limit Overlay Zone, the Coastal Overlay Zone (Appealable Area), the First Public Roadway, the Ocean Beach Cottage Emerging Historic District, the Parking Impact Overlay Zone (Beach Impact Area), Cont. (New Issue)
☐	2	Cont. the Residential Tandem Parking Overlay Zone, and the Ocean Beach Precise Plan and Local Coastal Program Area. [Information Only - No Response Required] (New Issue)
☐	3	Section 7.3.6 of the Ocean Beach Community Plan and Local Coastal Program (OBLCP) recommends limiting the use of caisson foundations that can interfere with shoreline erosion or become exposed over time. In addition, Section 7.3.4 of the OBLCP recommends that shoreline protective works should be designed to blend with the surrounding shoreline and provide lateral public beach access. Clarify how the proposed caisson supported seawall conforms with these objectives. (New Issue)
☐	4	A project has been recently submitted for a proposed seawall north and adjacent to the subject project. The neighboring applicants could consider coordinating their designs to incorporate the natural character of the bluff face and landform characteristics into the design pursuant to the SDMC and Ocean Beach Community Plan and Local Coastal Program (Section 7.3.4). (New Issue)

Planning Comments

Cleared?	Issue Num	Issue Text
☐	5	The site contains a sensitive coastal bluff and coastal beach (environmentally sensitive lands (ESL) as defined in SDMC 113.0103. The project proposes to relocate/reconstruct an existing seawall on a sensitive coastal bluff and coastal beach. (New Issue)
☐	6	The project requires a Process Three Coastal Development Permit for coastal development within the Appealable Area of the Coastal Overlay Zone. An application for a Coastal Development Permit may be approved or conditionally approved only if the decision maker makes all of the findings in SDMC 126.0708(a). (New Issue)
☐	7	The project requires a Process Three Site Development Permit for development on environmentally sensitive lands (sensitive coastal bluff and coastal beach. A Site Development Permit may be approved or conditionally approved only if the decision maker makes all of the findings in SDMC 126.0504(a) and the supplemental findings in SDMC 126.0504(b). (New Issue)
☐	8	Pursuant to LDC, Section 143.0143, the project shall comply with the Environmentally Sensitive Lands Regulations for Sensitive Coastal Bluffs, and the Coastal Bluffs and Beaches Guidelines in the Land Development Manual. Project is also subject to the regulations for sensitive coastal beaches, 143.0144. (New Issue)
☐	9	All development and accessory structures, shall be set back at least 40 feet (or more depending on the geotechnical report) from the coastal bluff edge, SDMC, Section 142.0340(f). Provide evidence via geotechnical report that development within the 40 foot setback can be supported. (New Issue)
☐	10	Reductions from the 40 setback shall be subject to 142.0340(f), and substantiated by a geotechnical report accepted by the LDR-Geology section. (New Issue)

Cleared?	Issue Num	Issue Text
☐	11	Per LDC Section 143.0143(g)(1): "Coastal bluff repair and erosion control measures may be allowed on the coastal bluff face only if determined to be the only feasible means of erosion control and when necessary, to protect the existing primary structure. Provide evidence via the geotechnical report that the bluff repair is necessary to protect the primary structure. (New Issue)
☐	12	All drainage from the improvements on the premises shall be directed away from any coastal bluff and either into an existing or improved public storm drain system or onto a street developed with a gutter system or public right-of-way designated to carry surface drainage run-off. All drainage from unimproved areas shall be appropriately collected and discharged in order to reduce, control, or mitigate erosion of the coastal bluff, 143.0143(d). (New Issue)
☐	13	In addition, the Ocean Beach Precise Plan lists standards for shoreline protective works, including, "competence of the structure to accomplish its purpose", "effects on neighboring properties", "effects on public resources such as beaches, including pocket beaches", "effect on sensitive intertidal habitat areas" and alternative to the proposed structure." Please provide information regarding the effect of the proposed wall on these standards. (New Issue)
☐	14	As outlined in the City's Coastal Bluffs and Beaches Guidelines, the effects which a shoreline protective device may have on natural shoreline processes can be quantified. The Coastal Commission has developed a Beach Sand Mitigation Program within the County of San Diego which includes a methodology by which impacts associated with protective devices can be quantified. (New Issue)
☐	15	The methodology is found in the Report on In-Lieu Fee Beach Sand Mitigation Program - San Diego County dated January 1997. To view the report online, please visit http://www.coastal.ca.gov/pgd/sand1.html (New Issue)
☐	16	Please provide an analysis (as a part of the submitted supplemental geotechnical report, or as a separate document by a licensed professional) of the amount of beach sand to be lost as a result of this project, and a calculation of the resulting fee in accordance with the methodology provided in the Report on In-Lieu Fee Beach Sand Mitigation Program - San Diego County dated January 1997. (New Issue)
☐	17	You shall consult the Coastal Commission on your proposal and provide their review comments. (New Issue)
☐	18	Please contact the Ocean Beach Planning Board to present and receive a recommendation on your project. (New Issue)
☐	19	The property line shown is incorrect. Please correct the property line on the plans. (New Issue)
☐	20	Development is shown that is within 25 feet of the Bluff edge. No development is permitted within 25 feet of the Bluff edge. Please see LDC Section 143.0143 (f). Please indicate that all proposed development would qualify for subsections (f)(2) and (f)(3). If the proposed development does not qualify for the specified type of development please remove from the plans. (New Issue)
☐	21	An Encroachment, Maintenance, Removal Agreement will be required for the proposed wall within the right-of-way. Planning will defer to Engineering on implementation. (New Issue)

Conditions

Cleared?	Issue Num	Issue Text
☐	22	Prior to the commencement of any work or activity authorized by this permit, the Owner/Permittee shall execute a Notice of Hazardous Condition Indemnification and Hold Harmless Agreement. (New Issue)
☐	23	Owner/Permittee shall execute a covenant of easement recorded against title to the affected premises and executed in favor of the City, SDMC 143.0152. The easement area shall include the undeveloped portion of the lot within the Sensitive Coastal Bluff as identified in the geotechnical report. The square footage/acreage of the easement area shall be identified in the Site Plan. (New Issue)
☐	24	Conditions may be added based on additional review. (New Issue)

Review Information

Cycle Type:	5 Submitted (Multi-Discipline)	**Submitted:**	07/26/2018	Deemed Complete on 07/27/2018
Reviewing Discipline:	LDR-Environmental	**Cycle Distributed:**	07/27/2018	
Reviewer:	**Szymanski, Jeffrey**	**Assigned:**	07/27/2018	
	(619) 446-5324	**Started:**	08/28/2018	
	Jszymanski@sandiego.gov	**Review Due:**	08/29/2018	
Hours of Review:	4.00	**Completed:**	08/29/2018	**COMPLETED ON TIME**
Next Review Method:	Submitted (Multi-Discipline)	**Closed:**	12/23/2018	

. The reviewer has indicated they want to review this project again. Reason chosen by the reviewer: First Review Issues.
. We request a 2nd complete submittal for LDR-Environmental on this project as: Submitted (Multi-Discipline).
. The reviewer has requested more documents be submitted.
. Your project still has 7 outstanding review issues with LDR-Environmental (all of which are new).
. Last month LDR-Environmental performed 85 reviews, 87.1% were on-time, and 32.1% were on projects at less than < 3 complete submittals.

Extended Initial Study

Cleared?	Issue Num	Issue Text
☐	1	The Environmental Analysis Section (EAS) has reviewed the referenced project and has determined that additional information is required for Visual Quality, Geology, and Planning. Until the above issues have been addressed, the CEQA determination can not be made and the environmental processing time line will be held in abeyance and the project will be placed in Extended Initial Study. (New Issue)

Visual Quality

Cleared?	Issue Num	Issue Text
☐	2	Additional information regarding the approximate length and height of the sea wall must be provided and shown on the plans. It appears that the wall may be over 200 feet in length at a maximum height over 10 feet (excluding the four feet base within formational soils). A significant impact can be identified for projects that include a crib, retaining or noise wall greater than six feet in height and 50 feet in length with minimal landscape screening or berming where the walls would be visible to the public. (New Issue)
☐	3	The applicant shall provide an elevation of the seawall with dimensions. Depending on the review of the elevations EAS will make a determination if additional information, such as photo simulations will be required or if a significant impact would occur. (New Issue)

Paleontology

Cleared?	Issue Num	Issue Text
☒	4	The project site is underlain by the Baypoint and Point Loma geological formations which have a high potential for paleontological resources. In accordance with the City's CEQA Thresholds a significant impact could occur if the grading would exceed 1000 cubic yards at a depth of 10 feet or more. Based upon the grading tabulations the project would not result in a signficant impact to these resources. (New Issue)

Biological Resources

Cleared?	Issue Num	Issue Text
☒	5	The project site contains existing development. Review of aerial and site photos appears to show that the project site does not contain any sensitive biological resources. EAS has no further comments on this issue. (New Issue)

GHG

Cleared?	Issue Num	Issue Text
☒	6	EAS has reviewed the CAP checklist and has determined that the project is consistent with the City's Climate Action plan. No impacts will occur. (New Issue)

Geology

Cleared?	Issue Num	Issue Text
☐	7	Geology staff has various issues that need to be addressed. EAS can not make the CEQA determination until all issue have cleared. (New Issue)

Planning

Cleared?	Issue Num	Issue Text

For questions regarding the 'LDR-Environmental' review, please call Jeffrey Szymanski at (619) 446-5324. Project Nbr: 611484 / Cycle: 5

Cleared?	Issue Num	Issue Text
☐	8	Please see comments from Planning staff. All planning comments must be addressed before the CEQA determination can be made. (New Issue)

AB 52 Tribal Cultural Resource

Cleared?	Issue Num	Issue Text
☐	9	Assembly Bill 52 (Gatto 2014), more commonly known as AB 52, was signed into State Law July 1, 2015. Essentially, it requires that lead agencies throughout the State of California undertaking CEQA review, at the request of a California Native American tribe, begin "Government-to-Government" consultation with that tribal nations. If necessary a notice of the project will sent to local California Tribes once the CEQA determination is made. (New Issue)

Summary

Cleared?	Issue Num	Issue Text
☐	10	Until the requested information has been provided, EAS is not able to complete the environmental review for the project and the environmental processing timeline will be held in abeyance. EAS will coordinate with the other reviewers as the review progresses regarding any additional potential environmental impacts. (New Issue)

Review Information

Cycle Type:	5 Submitted (Multi-Discipline)	**Submitted:**	07/26/2018	Deemed Complete on 07/27/2018
Reviewing Discipline:	LDR-Engineering Review	**Cycle Distributed:**	07/27/2018	
Reviewer:	**Abdelmottaleb, Noha**	**Assigned:**	07/27/2018	
	(619) 685-1347	**Started:**	08/24/2018	
	Nabdelmottal@sandiego.go	**Review Due:**	08/24/2018	
Hours of Review:	4.50	**Completed:**	08/24/2018	**COMPLETED ON TIME**
Next Review Method:	Submitted (Multi-Discipline)	**Closed:**	12/23/2018	

. The review due date was changed to 09/06/2018 from 08/29/2018 per agreement with customer.
. The reviewer has indicated they want to review this project again. Reason chosen by the reviewer: First Review Issues.
. We request a 2nd complete submittal for LDR-Engineering Review on this project as: Submitted (Multi-Discipline).
. The reviewer has requested more documents be submitted.
. Your project still has 16 outstanding review issues with LDR-Engineering Review (all of which are new).
. Last month LDR-Engineering Review performed 80 reviews, 87.5% were on-time, and 30.3% were on projects at less than < 3 complete submittals.

First Review Issues

Cleared?	Issue Num	Issue Text
☐	1	The Engineering Review Section has reviewed the subject development and have the following comments that need to be addressed prior to a Public Hearing / Public Notice of Decision. Upon resubmittal, we will complete our review of the Coastal Development Permit and Neighborhood Development Permit Plans. (New Issue)
☐	2	Please provide a table with the following information: a. Total Disturbance Area: _____ b. Existing amount of impervious area: _____ c. Proposed amount of impervious area: _____ d. Total Impervious Area: _____ e. Impervious % Increase: _____ NOTE: Impervious area shall include: roof, sidewalk, parking area, walkways, pools, pool decks, etc. (New Issue)
☐	3	FYI: Pending reviewing the above information, it will be determined if project is a Standard or a Priority Development Project and further comments will follow on the next review cycle. (New Issue)
☐	4	FYI: The San Diego Water Board adopted Order No. R9-2013-0001, NPDES No. CAS0109266, National Pollutant Discharge Elimination System (NPDES) Permit and Waste Discharge Requirements for Discharges from the Municipal Separate Storm Sewer Systems (MS4s) Draining the Watersheds within the San Diego Region. This project will be required to adhere to the current City of San Diego Storm Water Standards in effect at the time of approval of ministerial permit. (New Issue)
☐	5	If the project is determined to be standard development, please submit a completed Form I-4 and Form I-5 that addresses how the 8 possible Low Impact Development (LID) BMPs and 6 possible Source Control BMPs have been incorporated into the project. If any of the 14 possible BMPs have not been applied in the project design, add a discussion in the form why the omitted BMPs are not feasible or not applicable. A copy of the forms I-4 and I-5 can be downloaded from: https://www.sandiego.gov/sites/default/files/standard_project_forms.pdf (New Issue)

Cleared?	Issue Num	Issue Text
☐	6	If project is a Priority Project and requires BMPs. Please submit an electronic and hard copy of the Storm Water Quality Management Plan (SWQMP) consistent with the current City of San Diego's Storm Water Standards. Required elements of a SWQMP are provided in Appendix A on this manual. Details supporting all decisions made in accordance with Chapter 4 requirements shall be documented in the SWQMP. The specific process is outlined in the required Submittal Template in Appendix A of the revised Storm Water Standards. (New Issue)
☐	7	SDMC section 143.0143(d) states: All drainage from the improvements on the premises shall be directed away from any coastal bluff and either into a newly improved public storm drain system or onto a street developed with a gutter system or public right-of-way designated to carry surface drainage run-off. All drainage from any unimproved areas shall be appropriately collected and discharged in order to reduce, control, or mitigate erosion of the coastal bluff. (New Issue)
☐	8	Please add previous note on the Site Plan and show how additional runoff is routed away from the Coastal Bluff. (New Issue)
☐	9	Please note that this project will be conditioned to obtain a grading permit. (New Issue)
☐	10	Submit a preliminary drainage study which addresses the existing and proposed storm water run-off and discharge locations for the project site. The study shall address the adequacy of the down stream system(s) and which demonstrates that no adverse impacts will occur to these systems as a result of the increased runoff from the proposed development. If impacts are anticipated, state the measures that must be taken to mitigate such impacts. If there are no negative impacts to any adjacent properties, a statement should be made in the report. (New Issue)
☐	11	Please provide a copy of the recorded permits and Encroachment Maintenance and Removal Agreement (EMRA/EMA) for the non-standards improvements in the public right of way. **If no EMRA/EMAs exist, please call out to remove all non-standard improvements encroaching in the public right of way and state all improvements to be removed on the Site Plan. (New Issue)
☐	12	Please add the property lines to all provided cross sections. (New Issue)
☐	13	Please call out Coastal Development Permit #2171397 and Site Development Permit #2171398 on the Site Plan. (New Issue)
☐	14	Development Permit Conditions will be determined on the next submittal when all requested information is provided. (New Issue)
☐	15	Please provide a written response to all comments whether you agree or not and in case of disagreement, express your reasoning. (New Issue)
☐	16	Additional comments may be recommended pending further review of any redesign of this project. These comments are not exclusive. Should you have any questions or comments, please contact Noha Abdelmottaleb at NAbdelmottal@sandiego.gov (New Issue)

Review Information

Cycle Type:	5 Submitted (Multi-Discipline)	**Submitted:**	07/26/2018	Deemed Complete on 07/27/2018
Reviewing Discipline:	Community Planning Group	**Cycle Distributed:**	07/27/2018	
Reviewer:	**Daly, Tim**	**Assigned:**	08/28/2018	
	(619) 446-5356	**Started:**	08/28/2018	
	TPDaly@sandiego.gov	**Review Due:**	08/24/2018	
Hours of Review:	0.20	**Completed:**	08/28/2018	**COMPLETED LATE**
Next Review Method:	Submitted (Multi-Discipline)	**Closed:**	12/23/2018	

. The review due date was changed to 09/06/2018 from 08/29/2018 per agreement with customer.
. The reviewer has indicated they want to review this project again. Reason chosen by the reviewer: First Review Issues.
. We request a 2nd complete submittal for Community Planning Group on this project as: Submitted (Multi-Discipline).
. The reviewer has requested more documents be submitted.
. Your project still has 2 outstanding review issues with Community Planning Group (all of which are new).
. Last month Community Planning Group performed 61 reviews, 50.8% were on-time, and 34.4% were on projects at less than < 3 complete submittals.

Ocean Beach Planning Board

Cleared?	Issue Num	Issue Text
☐	1	Please contact the Chair for the Ocean Beach Planning Board, (as identified in the assessment letter) to make arrangements to present your project for review at their next available meeting. This Community Plannig Group is officially recognized by the City as a representative of the community, and an advisor to the City in actions that would affect the community. The Development Services Department has notified the group of your request and has sent them a copy of your project plans and documents. (New Issue)
☐	2	Prior to scheduling your application for public hearing, provide a copy of the groups' final recommendation, including vote count and any addtional conditions from the group. (New Issue)

For questions regarding the 'Community Planning Group' review, please call Tim Daly at (619) 446-5356. Project Nbr: 611484 / Cycle: 5

Review Information

Cycle Type:	5 Submitted (Multi-Discipline)	**Submitted:**	07/26/2018	Deemed Complete on 07/27/2018
Reviewing Discipline:	Coastal Commission	**Cycle Distributed:**	07/27/2018	
Reviewer:	**Daly, Tim**	**Assigned:**	08/28/2018	
	(619) 446-5356	**Started:**	08/28/2018	
	TPDaly@sandiego.gov	**Review Due:**	08/24/2018	
Hours of Review:	0.60	**Completed:**	09/04/2018	**COMPLETED LATE**
Next Review Method:	Submitted (Multi-Discipline)	**Closed:**	12/23/2018	

. The review due date was changed to 09/06/2018 from 08/29/2018 per agreement with customer.
. The reviewer has indicated they want to review this project again. Reason chosen by the reviewer: First Review Issues.
. We request a 2nd complete submittal for Coastal Commission on this project as: Submitted (Multi-Discipline).
. The reviewer has requested more documents be submitted.
. Your project still has 1 outstanding review issues with Coastal Commission (all of which are new).
. Last month Coastal Commission performed 3 reviews, 66.7% were on-time, and 33.3% were on projects at less than < 3 complete submittals.

Initial Review

Cleared?	Issue Num	Issue Text
☐	1	See CA Coastal Commission San Diego Ofifice letter dated 8/31/2018 regarding the proposed development. Please provide a response to address each issue identified in the letter. Any questions, please contact: Dennis D. Davis II Coastal Program Analyst I California Coastal Commission San Diego District 7575 Metropolitan Drive #103 San Diego, CA 92108 Dennis.Davis@coastal.ca.gov (New Issue)

For questions regarding the 'Coastal Commission' review, please call Tim Daly at (619) 446-5356. Project Nbr: 611484 / Cycle: 5

Submittal Requirements

THE CITY OF SAN DIEGO
Development Services Department
1222 First Avenue, San Diego, CA 92101-4154

L64A-001

Project Information

Project Nbr: **611484** **Title:** 1409 Ocean Front Seawall
Project Mgr: Daly, Tim (619)446-5356 TPDaly@sandiego.gov

Review Cycle Information

Review Cycle: 6 Submitted (Multi-Discipline) **Opened:** 12/23/2018 11:46 am **Submitted:**
Due: **Closed:**

Required Documents:

Package Type	Pkg Qty	Document Type	Qty Needed
Development Plans	9	Applicant Response to Issues	9
Geotechnical Reports	3	Geotechnical Study	3
Historic Resource Information	2	Historic Resource Information	2
Development Plans	9	Site Development Plans	9
Draft Findings	2	Draft Findings	2
Photo Simulations	3	Photo Simulations	3
Encroachment Maintenance & Removal Agreement	2	Agreement - Encroachment 1 (recorded)	2
Drainage/Hydrology Study	3	Drainage Study	3
Development Plans	9	Development Approval - Prior	9
Historic Resource Information	2	Historic Photographic Survey	2
Storm Water Quality Management Plan	3	Storm Water Quality Management Plan	3

STATE OF CALIFORNIA -- THE NATURAL RESOURCES AGENCY EDMUND G. BROWN, JR., *Governor*

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

August 31, 2018

Tim Daly
City of San Diego Development Services Department
1222 First Avenue, MS 501
San Diego, CA 92101

Re: 1409 Ocean Front Street Seawall

Dear Mr. Daly:

Thank you for soliciting our comments on the development proposed at 1409 Ocean Front Street in the Ocean Beach Community Plan (OBCP) area. The proposed development includes installing temporary erosion control measures, removing concrete and rebar debris on the beach, constructing a secant pile wall landward of the existing seawall, and installing new landscape and hardscape improvements to protect the existing single-family residence. Commission staff has concerns with the construction of a secant pile wall in an area containing sensitive coastal bluffs as designated in the City of San Diego's certified Local Coastal Program (LCP). Staff also seeks clarification as to the scope and method for removing the concrete and rebar debris on the beach.

OBCP Policy 7.1.2 carves out a narrow exception for the construction of coastal protective devices that are (1) necessary to protect existing development, and (2) are designed to be consistent with the other provisions of the OBCP. OBCP Policy 7.3.4 allows the placement of shoreline protective devices only when required to serve coastal-dependent uses or when there is no other feasible means to protect existing principal structures, such as homes, in danger from erosion, consistent with Coastal Act Section 30235 and 30253. OBCP Policy 7.3.7 requires that any review for a Coastal Development Permit for a shoreline protection device should consider, among other things, an assessment of changes to geologic site and beach conditions and changes in beach width relative to sea level rise. The secant pile wall, which is essentially a wall of caissons, appears to be functioning as a shoreline protective device in place of the deteriorating seawall.

In order to be consistent with the City's certified LCP, a coastal protective device, such as the proposed caisson wall, may only be authorized if it is necessary to protect the existing primary structure (e.g., the single-family residence); however, the plans do not indicate or provide the factor-of-safety for the primary structure. Sheet C-2 of the plans show the closest edge of the existing residence is over twenty-five feet away from the bluff edge. Given the distance between the bluff edge and the existing residence, it is unclear whether the residence is in immediate danger. Furthermore, accessory structures such as backyard patios/decks are not the structures that OBCP Policy 7.3.4 allows shoreline protective devices to protect and therefore cannot be used to justify the need for a shoreline protective device. As a reminder, the City should also consider changes to

geologic site, beach conditions, and changes in beach width relative to sea level rise. Thus, approval of the caisson wall without proof that the primary residence is in imminent danger would be inconsistent with OBCP Policy 7.1.2.

Additionally, the proposed caissons would alter the natural bluff by modifying erosion patterns and would eventually become exposed when the existing dilapidated seawall fails and erosion occurs. Once exposed, it would be very difficult or infeasible to remove the caissons since they are proposed to extend approximately twenty feet into the Point Loma Formation underlying the property. Any action to remove the caissons would likely create instability and erosion of the natural bluff material.

Therefore, approval of the secant pile wall would be inconsistent with the City's LCP. If the applicant has contrary evidence (e.g., factor-of-safety) that the primary structure is in danger, then the plans should be revised to include this information.

Staff also has concerns with the applicant's proposal to remove concrete and rebar debris materials on the beach. Sheet C-3 contains two cross-sections depicting the broken remains of the existing seawall step; however, the remains appear to be composed entirely of natural sediment from the Point Loma Formation. The seawall step seems to be connected to the formation of the void under the existing seawall but without additional information it is difficult to understand why the applicant is proposing to remove this natural material from the beach. Therefore, please clarify why the applicant is proposing to remove what appears to be natural bluff material from the beach. Staff is also concerned with any type of work occurring on the sandy beach due to potential impacts to public access. Please identify how the seawall step remains would be removed (e.g., by hand versus heavy equipment) and whether it is necessary to remove all of the remains to access the concrete and rebar.

In summary, Commission staff believes that the proposed development is not consistent with the City's certified LCP. If you have any questions or concerns please contact me at the above office.

Sincerely,

Dennis Davis
Coastal Planner

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