

CALIFORNIA COASTAL COMMISSION

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Filed: March 3, 2000
Staff: ALK-LB
Staff Report: May 25, 2000
Hearing Date: June 13-16, 2000
Commission Action:



STAFF REPORT AND RECOMMENDATION ON APPEAL
DE NOVO COASTAL DEVELOPMENT PERMIT

APPEAL NUMBERS: A-5-LGB-00-078 and A-5-LGB-00-079
LOCAL GOVERNMENT: City of Laguna Beach
DECISION: Approval with Conditions
APPLICANT: Five Star Resort, LLC **AGENT:** Athens Group
PROJECT LOCATION: 30801 Coast Highway, Laguna Beach (Orange County)
PROJECT DESCRIPTION: The applicant is proposing 1) subdivision of a 30-acre coastal blufftop lot, construction of master utilities and backbone infrastructure and 2) development of a 275-room resort, 14 condominiums and public park areas for the Treasure Island Destination Resort Community Project.

SUMMARY OF STAFF RECOMMENDATION

At a public hearing on April 11, 2000, the Commission determined that **a substantial issue existed** with respect to the local government's approvals of the proposed development on the grounds that the approvals did not conform to the Treasure Island certified Local Coastal Program (LCP). The major issues of the substantial issue staff report were blufftop grading and landform alteration and implementation of the adopted Resources Management Plan (RMP). Other issues evaluated include water quality; public access and recreation; community character and design; scenic and visual resources and acreage inconsistencies.

Staff recommends that the Commission, after a public hearing, **approve a de novo coastal development permit** for each component of the proposed development with ten (10) special conditions requiring: 1) retention of the local government conditions of approval; 2) submittal of revised plans demonstrating conformance with the required blufftop setback; 3) relocation of the blufftop accessway as needed; 4) no future shoreline protective devices for the resort of residential development, 5) recordation of an assumption-of-risk deed restriction; 6) implementation of the Resource Management Plan (RMP); 7) grant of responsibility for sewer, storm drain and diversion; 8) a written agreement for acceptance of nuisance flow diversion; 9) submittal of a Stormwater Monitoring Plan and 10) submittal of revised Water Quality Management Plan (WQMP). The primary issues of this development are blufftop grading and landform alteration, marine resources, water quality and public access.

PROCEDURAL NOTE:

The action currently before the Commission is the de novo portion of the appeals of two (2) local coastal development permits for development located within the jurisdiction of the certified Treasure Island Local Coastal Program (LCP) in the City of Laguna Beach. The Commission's standard of review for the proposed development is the certified Treasure Island LCP.

The current de novo staff report and recommendation analyzes both components of the Treasure Island development including 1) the subdivision, master utilities and backbone infrastructure and 2) the resort, condominiums and park areas. Although the staff report combines the analyses for the two components of the proposed Treasure Island development, the Commission must vote separately on each. The two necessary motions are provided on page 3.

SUBSTANTIVE FILE DOCUMENTS:

- City of Laguna Beach Local Coastal Program (LCP) for Treasure Island Resort and Destination Community Project.
- Final Program Environmental Impact Report (FEIR) and Mitigation Monitoring Program for the LCP and Treasure Island Specific Plan adopted June 8, 1998.
- FEIR Addendum dated September 29, 1999.
- City of Laguna Beach Administrative Record for Coastal Development Permits Nos. 99-75, 99-76, 99-78 and 99-79.
- California Coastal Commission Adopted Revised Findings on the City of Laguna Beach Local Coastal Program amendment 1-98 for the Treasure Island Area of Deferred Certification as Approved by the Commission on August 13, 1998 (Revised Findings adopted November 6, 1998).
- Supplemental Consultations from Law Crandall dated April 19, 2000 and May 17, 2000

LIST OF EXHIBITS:

1. Regional Location Map
2. Vicinity Map
3. Project Plans and Elevations
4. LCP Specific Plan Map
5. Conditions of City of Laguna Beach CDP No. 99-75 for subdivision, master utilities and backbone infrastructure
6. Conditions of City of Laguna Beach CDP No. 99-76 for development of resort, condominiums and park
7. Public Correspondence
8. Depth of Existing Fills Map

9. Memorandum from Mark Johnsson, Coastal Commission Senior Geologist, dated May 22, 2000.
10. Depth of Cut and Fill Map
11. Earthwork Quantity Calculation Map
12. Limits of Grading vs. 45% Blufftop Delineation
13. Letter from Law Crandall dated March 24, 2000
14. Letter from Keith Companies dated March 24, 2000
15. Letter from Fire Chief
16. Proposed View Corridors
17. Allowable Building Footprint under LCP
18. Proposed Building Footprint
19. FEIR Top of Bluff Figure
20. Letters (2) from Law Crandall dated April 19, 2000
21. Resource Management Plan Map with Identification of Marine Reserve
22. City of Laguna Beach CDP No. 99-78
23. City of Laguna Beach CDP No. 99-79
24. Water Quality Measures ("Attachment A")
25. Applicant's Description of Project Water Quality Improvements
26. Letter from South Coast Water District dated May 25, 2000
27. LCP Public Access and Recreation Plan

I. MOTIONS AND RESOLUTIONS:

A. MOTION AND RESOLUTION FOR DE NOVO PERMIT NO. A-5-LGB-00-078

The staff recommends that the Commission make the following motion and adopt the following resolution:

Motion: *I move that the Commission approve CDP No. A-5-LGB-00-078 pursuant to the staff recommendation.*

Staff Recommendation:

Staff recommends a **YES** vote. Passage of this motion will result in adoption of the following resolution and findings. The motion passes only by affirmative vote of majority of the Commissioners present.

Resolution to Approve CDP No. A-5-LGB-00-078:

The Commission hereby **GRANTS** a permit, subject to the conditions below, for the proposed development on the grounds that, as conditioned, the proposed development, located between the first public road and the sea, conforms to the requirements of the Treasure Island certified Local Coastal Program and that the development will not have any adverse impacts on the environment within the meaning of the California Environmental Quality Act.

B. MOTION AND RESOLUTION FOR DE NOVO PERMIT NO. A-5-LGB-00-079

The staff recommends that the Commission make the following motion and adopt the following resolution:

Motion: *I move that the Commission approve CDP No. A-5-LGB-00-079 pursuant to the staff recommendation.*

Staff Recommendation:

Staff recommends a **YES** vote. Passage of this motion will result in adoption of the following resolution and findings. The motion passes only by affirmative vote of majority of the Commissioners present.

Resolution to Approve CDP No. A-5-LGB-00-079:

The Commission hereby **GRANTS** a permit, subject to the conditions below, for the proposed development on the grounds that, as conditioned, the proposed development, located between the first public road and the sea, conforms to the requirements of the Treasure Island certified Local Coastal Program and that the development will not have any adverse impacts on the environment within the meaning of the California Environmental Quality Act.

II. STANDARD CONDITIONS:

1. Notice of Receipt and Acknowledgment. The permit is not valid and development shall not commence until a copy of the permit, signed by the permittee or authorized agent, acknowledging receipt of the permit and acceptance of the terms and conditions, is returned to the Commission office.
2. Expiration. If development has not commenced, the permit will expire two years from the date this permit is reported to the Commission. Development shall be pursued in a diligent manner and completed in a reasonable period of time. Application for extension of the permit must be made prior to the expiration date.
3. Compliance. All development must occur in strict compliance with the proposal as set forth in the application for permit, subject to any special conditions set forth below. Any deviation from the approved plans must be reviewed and approved by the staff and may require Commission approval.
4. Interpretation. Any questions of intent or interpretation of any condition will be resolved by the Executive Director or the Commission.
5. Inspections. The Commission staff shall be allowed to inspect the site and the project during its development, subject to 24-hour advance notice.
6. Assignment. The permit may be assigned to any qualified person, provided assignee files with the Commission an affidavit accepting all terms and conditions of permit.
7. Terms and Conditions Run with the Land. These terms and conditions shall be perpetual, and it is the intention of the Commission and the permittee to bind all future owners and possessors of the subject property to the terms and conditions.

III. SPECIAL CONDITIONS:

1. Retention of Local Government Conditions of Approval

The conditions of approval for CDP No. 99-75 approved by the Laguna Beach City Council on February 15, 2000 and the conditions of approval for CDP No. 99-76 approved by the Laguna Beach City Council on January 11, 2000, and subsequently approved by the Laguna Beach Joint Planning Commission and Design Review Board on February 16, 2000 that are not in conflict with the Commission's special conditions listed below are incorporated by reference and shall remain in effect. For purposes of condition compliance, the City of Laguna Beach shall be responsible for reviewing and determining compliance with special conditions imposed through CDP No. 99-75 and CDP No. 99-76 as contained in Exhibits 5 and 6.

2. Conformance with Blufftop Setback

- A. **PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT**, the applicant shall submit, for the review and approval of the Executive Director, a revised Tentative Parcel Map and project plans which conform to the following requirements.
- 1.) The plans shall demonstrate that all development conforms to the 25' blufftop setback plus 20' blufftop retreat setback as measured from the existing (pre-grading) top of bluff, as defined in the certified LCP.
- B. The permittee shall undertake development in accordance with the approved final plan. Any proposed changes to the approved final plan shall be reported to the Executive Director. No changes to the approved final plan shall occur without a Commission amendment to this coastal development permit unless the Executive Director determines that no amendment is required.

3. Relocation of Blufftop Accessway

- A. By acceptance of this permit, the applicant and landowner further agree, on behalf of themselves and all other successors and assigns, that the landowner shall remove and relocate the blufftop accessway in the event that the development is threatened with damage or destruction from waves, erosion, storm conditions or other natural hazards in the future. In the event that portions of the development fall to the beach before they are removed, the landowner shall remove all recoverable debris associated with the development from the beach and ocean and lawfully dispose of the material in an approved disposal site. Such relocation shall require a coastal development permit. At which time, the Commission shall also determine whether the blufftop park shall also be extended landward into the 20' blufftop retreat setback if park acreage is significantly reduced.
- B. **PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT**, the applicant shall execute and record a deed restriction, in a form and content acceptable to the Executive Director incorporating all of the above terms of this condition. The deed restriction shall include a legal description of the applicant's entire parcel. The deed restriction shall run with the land, binding all successors and assigns, and shall be recorded free of prior liens that the Executive Director determines may affect the enforceability of the restriction. This deed restriction shall not be removed or changed without a Commission amendment to this coastal development permit.

4. No Future Shoreline Protective Device

- A. By acceptance of this permit, the applicant agrees, on behalf of himself and all other successors and assigns, that no shoreline protective device(s) shall ever be constructed to protect the resort facilities or residential development approved pursuant to CDPs A-5-LGB-00-078 and A-5-LGB-00-079, including future improvements, in the event that the property is threatened with damage or destruction from waves, erosion, storm conditions or other natural hazards in the future. By acceptance of this permit, the applicant hereby waives, on

behalf of himself and all successors and assigns, any rights to construct such devices that may exist under Public Resources Code Section 30235.

- B. **PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT**, the applicant shall execute and record a deed restriction in a form and content acceptable to the Executive Director, which reflects the above restriction on development. The deed restriction shall include a legal description of the applicant's entire parcel. The deed restriction shall run with the land, binding all successors and assigns, and shall be recorded free of prior liens that the Executive Director determines may affect the enforceability of the restriction. This deed restriction shall not be removed or changed without a Commission amendment to this coastal development permit.

5. Assumption of Risk

- A. By acceptance of this permit, the applicant acknowledges and agrees (i) that the site may be subject to hazards from waves, bluff retreat and erosion; (ii) to assume the risks to the applicant and the property that is the subject of this permit of injury and damage from such hazards in connection with this permitted development; (iii) to unconditionally waive any claim of damage or liability against the Commission, its officers, agents, and employees for injury or damage from such hazards; and (iv) to indemnify and hold harmless the Commission, its officers, agents, and employees with respect to the Commission's approval of the project against any and all liability, claims, demands, damages, costs (including costs and fees incurred in defense of such claims), expenses, and amounts paid in settlement arising from any injury or damage due to such hazards.
- B. **PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT**, the applicant shall execute and record a deed restriction, in a form and content acceptable to the Executive Director incorporating all of the above terms of this condition. The deed restriction shall include a legal description of the applicant's entire parcel. The deed restriction shall run with the land, binding all successors and assigns, and shall be recorded free of prior liens that the Executive Director determines may affect the enforceability of the restriction. This deed restriction shall not be removed or changed without a Commission amendment to this coastal development permit.

6. Implementation of Resource Management Plan and Nomination of State Marine Park

- A. The permittee, in conjunction/concurrence with the City of Laguna Beach, shall implement the Resource Management Plan approved by CDP No. 99-78, approved by the City of Laguna Beach on December 1, 1999.
- B. The permittee, in conjunction/concurrence with the City of Laguna Beach, shall ensure the nomination of the offshore area as a State Marine Managed Area as required by CDP No. 99-79, approved by the City of Laguna Beach on December 1, 1999.

7. Year Round Nuisance Flow Diversion

- A. **PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT**, the applicant shall obtain, and submit to the satisfaction of the Executive Director, a binding statement from the South Coast Water District, verifying the District's capacity and commitment to accept nuisance flow runoff [up to a maximum of 10,000 gallons per day (GPD)], on a year-round basis from the project site and the 60 acre drainage area above the site, upon project completion, for treatment in the wastewater collection system at the Coastal Wastewater Treatment Plant. Diversion, as specified above, shall commence upon completion of the project, and prior to the opening of the resort, and shall continue for the life of the development.
- B. The permittee shall divert all nuisance flows in accordance with the specifications above. The permittee in conjunction/concurrence with the South Coast Water District shall construct all necessary infrastructure for diverting nuisance flows as described in the Water Quality Management Plan required herein. Any proposed changes to the approved diversion program described in the Water Quality Management Plan required herein shall be reported to the Executive Director by the appropriately designated entity, as described in Special Condition 8 of this permit. No changes to the approved program shall occur without an amendment to this coastal development permit unless the Executive Director determines no such amendment is required.
- C. **PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT**, the applicant shall execute and record a deed restriction, in a form and content acceptable to the Executive Director incorporating all of the above terms of this condition. The deed restriction shall include a legal description of the applicant's entire parcel. The deed restriction shall run with the land, binding all successors and assigns, and shall be recorded free of prior liens that the Executive Director determines may affect the enforceability of the restriction. This deed restriction shall not be removed or changed without a Commission amendment to this coastal development permit.

8. Responsibility for Sewer, Storm Drain and Diversion and Sediment Removal Systems

- A. **PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT**, the applicant shall demonstrate, to the satisfaction of the Executive Director, that a responsible entity has been granted the authority through a binding agreement to act on behalf of the Homeowners Association and Resort Owner/Operator in all requirements pertaining to sewer, storm drain and diversion and sediment removal systems at the project site as set forth in the project description for the City's approval of CDP 99-75 and/or CDP 99-76, and the Water Quality Management Plan required herein.
- B. **PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT**, the applicant shall execute and record a deed restriction, in a form and content acceptable to the Executive Director incorporating all of the above terms of this

condition. The deed restriction shall include a legal description of the applicant's entire parcel. The deed restriction shall run with the land, binding all successors and assigns, and shall be recorded free of prior liens that the Executive Director determines may affect the enforceability of the restriction. This deed restriction shall not be removed or changed without a Commission amendment to this coastal development permit.

9. Stormwater Monitoring Plan

A. **PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT**, the applicant shall submit a Stormwater Monitoring Plan for the review and approval of the Executive Director. The Plan shall be designed to meet the following criteria, and shall include at a minimum, the following components:

- 1) The Plan should include methods for acquiring the type of data necessary and appropriate to allow for analysis of stormwater impacts over a five-year period, if any, on the marine resources in the City-designated Marine Reserve as depicted in Exhibit 21.
- 2) The Plan should be prepared and/or reviewed by a biologist or ecologist with expertise in the field of coastal water quality monitoring program design.

B. The permittee, in conjunction/concurrence with the City of Laguna Beach, shall implement the Stormwater Monitoring Plan described above. Any proposed changes to the Plan shall be reported to the Executive Director. No changes to the approved Plan shall occur without an amendment to this coastal development permit unless the Executive Director determines no such amendment is required.

10. Revised Water Quality Management Plan (WQMP)

A. **PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT**, the applicant shall submit a revised Water Quality Management Plan (WQMP) for the review and approval of the Executive Director. The Plan shall be revised based on the following criteria, and shall include at a minimum, the following components:

- 1) The water quality measures 1 through 10 proposed by the applicant in "Attachment A", as provided in Exhibit 24 of the current staff report, shall be incorporated into the Water Quality Management Plan (WQMP).
- 2) The Plan shall be revised to be consistent with all final conditions of approval contained and incorporated by reference herein pertaining to proposed and required water quality management measures, including those applicable the Year Round Nuisance Flow Diversion program described in Special Condition 7.

- B. The permittee shall implement the water quality measures in accordance with the revised Water Quality Management Plan (WQMP). Any proposed changes to the WQMP shall be reported to the Executive Director. No changes to the approved program shall occur without an amendment to this coastal development permit unless the Executive Director determines no such amendment is required.

IV. FINDINGS AND DECLARATIONS

The Commission hereby finds and declares:

A. Project Location, Description, and Background

Project Location

The subject site is located in the southern portion of the City of Laguna Beach on the seaward side of Pacific Coast Highway just north of Aliso Beach (Exhibits 1 and 2). The approximately 30-acre coastal blufftop lot was previously used as a private 268-space trailer park. The site has been vacant since 1997, but many trailers remain on site.

Project Description

The applicant is proposing to subdivide and develop the subject site as a 30-acre resort and residential project, known as the Treasure Island Destination Resort Community. Specifically, the first segment of the proposed project involves the grading, construction of master utilities and backbone infrastructure improvements, and the subdivision of the site into large parcels for financing and/or conveyance to the City and/or other public agencies. The second portion of the project involves construction-level detail for the resort and its associated residential and public uses, including a 275-room resort, 14 condominiums, 17 single-family residential lots, and a blufftop park (Exhibit 3).

Project Background

On August 13, 1998, the Coastal Commission approved the Treasure Island Local Coastal Program (LCP) as a project specific amendment to the City of Laguna Beach Local Coastal Program. The site was previously an Area of Deferred Certification pending the resolution of public access concerns. The certified LCP allows for development of the site with a resort complex consisting of a resort center on 10.63 acres with 200-275 visitor-serving accommodations provided in a hotel, resort villas, and residence villas (condominiums). The certified LCP also allows for future residential development of up to 18 single-family residences and provides public benefits, including the dedication of nearly 14 acres into public ownership and the enhancement of public access throughout the site (Exhibit 4).

Local Approvals

As set forth in the Treasure Island LCP, all development within the project site is subject to City approval of a Master and/or Project-level coastal development permit (CDP). Pursuant to the certified LCP, the applicants submitted CDP applications for the proposed development to the City of Laguna Beach in September 1999. The City held multiple public hearings between September 1999 and February 2000 prior to project approval.

On January 11, 2000, the City of Laguna Beach City Council held a public hearing on the proposed project. At the conclusion of the public hearing, the City Council approved with conditions local CDP No. 99-76 for the resort, condominiums and park areas associated with the Treasure Island development, finding that the project, as conditioned, conformed to the City's certified LCP for Treasure Island.

On February 15, 2000, the City of Laguna Beach City Council held a public hearing on the proposed project. At the conclusion of the public hearing, the City Council approved with conditions local CDP No. 99-75 for the subdivision, master utilities and backbone infrastructure for the Treasure Island development, finding that the project, as conditioned, conformed to the City's certified LCP for Treasure Island.

Pursuant to Condition No. 1 of CDP No. 99-76, a subsequent approval by the Joint Planning Commission and Design Review Board was required before the City Council's approval became final. At the conclusion of the public hearing held on February 16, 2000, the Joint Planning Commission and Design Review Board granted conditional approval of CDP No. 99-76.

The City's original conditions have been included as Exhibits 5 and 6. Where they do not conflict with the Commission's conditions, the City's conditions for CDP No. 99-75 and CDP No. 99-76 have been incorporated by reference into the current Commission-issued coastal development permits as Special Condition No. 1.

Appeal of Local Approvals

The Commission received notices of final local action on CDPs 99-75 and 99-76 on February 17, 2000. CDP No. 99-75 (assigned appeal no. A-5-LGB-00-078) approved the subdivision, master utilities and backbone infrastructure and CDP No. 99-76 (assigned appeal no. A-5-00-LGB-00-079) approved the construction of the resort, condominiums and park areas.

By March 3, 2000, within ten working days of receipt of the notices of final action, five (5) parties had appealed the local actions on the grounds that the approved project does not conform to the requirements of the certified LCP. Appellants included Village Laguna, South Laguna Civic Association, Orange County CoastKeeper, John Gabriels and Eugene R. Atherton. The three organizations appealed both local actions, while the two individuals appealed only CDP No. 99-76 for the construction portion of the project.

At a public hearing on April 11, 2000, the Commission determined that a substantial issue existed with respect to the local government's approvals of the proposed development on the grounds that the approvals did not conform to the Treasure Island certified Local Coastal Program (LCP). The major issues addressed in the staff report were blufftop grading and landform alteration and implementation of the adopted Resources Management Plan (RMP). Other issues evaluated include water quality; public access and recreation; community character and design; scenic and visual resources and acreage inconsistencies.

Public Comment

Since the substantial issue hearing, numerous letters of support for the proposed project were received by staff. Proponents state that the project, as approved by the City of Laguna Beach, has undergone sufficient scrutiny at the local level, was approved in a special election by a majority of citizens, and should proceed without further delay. A few letters of opposition were

received as well. The opponents express concern over the proposed landform alteration, the density of the project as it relates to community character, and the amount of private vs. public land provided. Their concerns regarding landform alteration are addressed in Section D. Public access issues are discussed in Section G. Also, while the Commission found that community character concerns did not raise a substantial issue at the initial hearing stage, they are briefly discussed in Section I. All public correspondence received to date is attached as Exhibit 7.

B. Adoption of Substantial Issue Findings

The findings and declarations set forth in the substantial issue staff report are herein incorporated by reference. The substantial issue staff report discusses several issues raised by appellants that staff recommended did not raise a substantial issue regarding consistency of the project with the certified LCP. The Commission finds, for the reasons set forth in the substantial issue staff report and herein, that the issues discussed at pages 21 to 33 of the substantial issue staff report do not provide a basis for finding that the project is inconsistent with the Treasure Island certified LCP.

C. Standard of Review

The Commission's standard of review for the proposed development is the certified Treasure Island LCP. The certified Treasure Island LCP is comprised of the certified Land Use Plan (LUP) and the certified Implementation Actions Program (IAP).

Additionally, Section 30604 (c) of the Coastal Act requires that every coastal development permit issued for any development between the nearest public road and the sea shall include a specific finding that the development is in conformity with the public access policies of Chapter 3 of the Coastal Act.

D. Grading and Landform Alteration

At the substantial issue hearing, the Commission found that the project raised questions of consistency with the grading and landform alteration policies of the certified LCP based on the extent and quantity of grading required for implementation of the Treasure Island Destination Resort Community Project. In addition, a discrepancy was noted between the City's definition of "top of bluff" as compared to the definition provided in the certified LCP.

Presently, at the de novo hearing stage, the Commission must determine whether the proposed development is consistent with the grading and landform alteration policies approved by the Commission under the Treasure Island certified LCP. The following LCP policies pertaining to grading and landform alteration are used as the standard of review in the current analysis.

Treasure Island Certified LCP Policies

Section 3.2 (Physical Resources Policies) of the Treasure Island certified LCP sets forth geotechnical policies and includes technical information related to mitigation of geologic hazards and implementation of the Land Use Plan. The policies address soil conditions, existing artificial fill on the site and the stability of bluffs within and adjacent to the LCP area.

LCP policies 3.2.2-1 through 3.2.2-10 specify the required blufftop setbacks and identify the need for remediation of areas of artificial fill. Those LCP policies that relate to the current analysis include:

- Policy 3.2.2-4 Development above the coastal bluff shall be engineered to ensure that surface/subsurface drainage does not contribute to erosion or adversely affect the stability of the bluff. Any minor residual effects related to storm drainage improvements shall be mitigated by recontouring and revegetating to obtain a natural landform appearance.*
- Policy 3.2.2-5 Any bluff areas requiring landform and remedial grading and/or slope stabilization (e.g., to provide ADA-compliant coastal access that is safe for the disabled) shall be recontoured and revegetated with native and drought-tolerant plant material to obtain a natural landform appearance.*
- Policy 3.2.2-6 Development, including Bluff-top Park improvements adjacent to the bluff, shall be located and designed to minimize the alteration of the existing landform and the construction of artificial devices that, except during the demolition of the existing trailer park and initial mass and/or remedial grading, would substantially alter existing landforms, and to avoid and discourage people from leaving designated areas and paths to climb on the bluffs.*
- Policy 3.2.2-7 Bluff stabilization and remediation of areas of existing artificial fill associated with historic mobile home development, ramp construction, movie set construction, piers and slabs along the shoreline, and other previous grading and development, whether legally permitted or not, shall be allowed if otherwise the fill poses a public health and/or safety risk, if bluff stabilization/remediation is designed to minimize landform alteration, and if the bluff will be restored to a natural appearance through contour grading and landscaping consisting of native and drought-tolerant vegetation.*
- Policy 3.2.2-8 Within the interior of the site (i.e., the portion of bluff-top terrace that is 25 feet or more inland from the bluff face), remediation of existing artificial fill associated with historic mobile home development, archaeological investigations, road construction, and other previous grading and development, whether legally permitted or not, shall be allowed under certain conditions relating to archaeological find protection, if the remediation is designed to implement LCP-approved land use development.*

In addition, the Flood Control and Hydrology Policies of Section 3 contains the following policy which also relates to the subsequent grading discussion:

Policy 3.2.2-16 The Resort Villas area of the site shall generally be graded to direct flow toward local street and away from the bluff. Sites that are too low to drain to the street shall be required to provide a private drainage system designed to protect and minimize significant adverse impacts on the marine environment and stability of the bluffs in conjunction with the City's review of the project-level CDP for the Resort Villas.

Chapter 9 (Resource Management Program) of the LCP outlines objectives and criteria to implement the policies contained in Chapter 3 (Resource Protection Policies) discussed above. The Resource Management Program, or RMP, provides requirements and regulations to serve as the Implementing Actions Program (IAP) for the Land Use Plan (LUP). The following RMP provisions discuss grading activities:

Section 9.1.2-2 Create a public Bluff-top park that protects the bluff face and bluff top resources while offering passive recreation and view appreciation of the coastal/marine resources from the top of the terrace.

Section 9.3.1-1a Grading—Grading activities within the coastal bluff shall be limited to that which is necessary to implement the Specific Plan, to remove the existing trailer park, to restore and protect a natural landform appearance within the disturbed area, to provide coastal access improvements as set forth in Section 11.6, to install required drainage and other backbone infrastructure improvements as set forth in Section 10.6, and to undertake a minimal amount of remedial grading necessary to undertake the above-referenced restoration/protection, public access ramp construction, and drainage improvements in such a way that will minimize the visual effect on the existing bluff landform.

Chapter 10 (Resort Development Concept) provides similar implementation provisions. The purpose of the Resort Development Concept is to conceptually describe the physical design and engineering of the project in terms of major public facilities and resort areas within the site.

Analysis of Proposed Grading and Landform Alteration

The subject site is an approximately 30-acre parcel, consisting of a blufftop area, bluff face, and sandy beach. The buildable portion of the site has a relief of about 20 feet and is adjacent to an approximately 60 foot high coastal bluff. The site is currently developed with a mobile home park that will be removed prior to development of the proposed Treasure Island Resort Community. The mobile home park sits on a significant amount of historic fill existent since the 1930s (Exhibit 8). As such, the applicant asserts that much of the site must be graded to remove the uncertified fill in order to accomplish the development goals of the certified LCP.

While the Commission recognizes that the site is known to have artificial fill that must be removed prior to site development, the amount and extent of grading currently proposed are at issue. The subsequent analysis discusses the consistency of the proposed project to the

grading and landform alteration policies of the Treasure Island certified LCP approved by the Commission in 1998.

The Commission's technical staff has evaluated the current project and contributed to the current staff report and recommendation. The Commission's Senior Geologist has reviewed the consultant's geotechnical investigation and supplemental analyses, and conducted a site visit on May 5, 2000. The Commission's Senior Engineer also has evaluated the associated documents and met with the consultant's technical staff. The Commission's geologist concurs with the applicants' geotechnical consultants in that the proposed development, properly conditioned, will neither create nor contribute significantly to erosion, geologic instability or destruction of the site or surrounding area. He states in a memorandum dated May 22, 2000 (Exhibit 9), *"the principal structures should not be at risk from erosion over their anticipated economic lifespan (75 years). There are, however, a number of specific conditions that need to be applied to the development to ensure that this is the case."* These conditions have been incorporated into the current staff report where appropriate.

Quantity of Grading

The regulations and policies set forth in the Treasure Island LCP require that minimal landform alteration occur and limit the amount and location of grading allowed along the bluff top and bluff face. The applicant is proposing grading operations in excess of that estimated in the certified LCP and will grade beyond the existing top of bluff.

As approved in the LCP, the Conceptual Grading Plan discussed in Section 10.7.3 estimated that the project would *"generate approximately 105,000 cubic yards of cut and 65,000 cubic yards of fill, exclusive of grading required to remediate any uncompacted fills or geologically unstable areas within the interior of the historic trailer park."* However, as proposed, grading will involve approximately 230,000 cubic yards of mass earthwork, including remedial grading. Proposed grading operations are estimated to generate approximately 200,000 cubic yards of cut and 30,000 cubic yards of fill.

The amount of remedial grading was never identified at the LCP level; therefore, the quantities can not be compared with total accuracy. In addition, the term "remedial" is not defined in the certified LCP or the Final EIR. Nonetheless, as referenced in the LCP Regulations and Site Development Standards, it was understood at the LCP level that a coastal development permit would be required for *"remedial grading required to resolve geotechnical/soils engineering problems associated with the permitted development of this Planning Area and/or to satisfy engineering requirements for related infrastructure and other permitted uses and development."* As such, the applicant submitted to the City of Laguna Beach a more finalized grading plan for the local CDP. The current plan includes all proposed grading of the site, including that considered by the applicant to be "remedial."

The applicant and City have both asserted that the amount of grading proposed for implementation of the proposed project is consistent with the intent of the certified LCP. They state that the amount of grading now proposed is the minimum necessary to prepare the site for development of the proposed Treasure Island Resort Community Project. As evaluated by their technical consultants, Law Crandall,

"The fill at the site is of low quality and would not be considered certified fill. Based on our observations, it is highly unlikely that the artificial fill has been properly engineered. It

appears that the height of the original bluff was raised on most areas using uncertified fill materials."

Therefore, due to the amount of uncertified fill on the site, the consultants have recommended that much of the fill be removed prior to development. However, the Commission does not recognize all of the proposed grading to be remedial. Some of the proposed blufftop grading will occur in areas that were not previously developed with mobile homes (Exhibit 10). In addition, cut will extend into natural material beneath existing fill. As stated in Exhibit 9, the Commission's staff geologist notes:

"The grading plan calls for nearly twice the grading approved in the LCP, which will result in over 200,000 cubic yards of cut in excess of fill. This grading cannot be considered remedial under the LCP, as it removes substantial amounts of natural materials (terrace deposits and bedrock) in addition to artificial fill."

Thus, although the LCP does recognize that there would be some remediation and restoration grading within the park site in areas of previous mobile home development, the Commission must determine whether the amount of grading proposed goes beyond what is considered *"remediation and restoration."* The Commission must also consider if the amount of grading proposed in excess of that required for *"remediation and restoration"* is necessary *"to satisfy engineering requirements for infrastructure and other permitted uses and development,"* as discussed on page 16. Finally, the Commission must decide if the site is considered a *"natural landform"* although a significant amount of fill has been placed on the site in conjunction with the mobile home park development.

As stated above, the technical staff has confirmed that the proposed grading within the interior portion of the site goes beyond that necessary to remove existing artificial fill. At the deepest point of cut within the interior segment of the site, the depth of grading will extend 30' deep for the subterranean parking garage, well beyond the depth of fill and into natural material. However, the technical staff has indicated that grading along the bluff edge is limited to the removal of artificial fill, as further discussed in the *"Extent of Grading"* section on page 18.

While the Commission notes that the LCP requires landform alteration to be minimized where possible, the LCP also allows *"remediation to accomplish the goals of the LCP-approved land use development,"* as stated in Policy 3.2.2-8. This includes grading of the bluff edge for removal of the mobile home sites, as well as the grading along the interior portion of the site for development of the hotel, condominiums and residential lots. The Commission notes that the majority of cut material is being removed from the interior of the site and will not affect an existing natural landform as the site has been substantially altered with development of the mobile home park. As identified on Exhibit 11, much of the cut is required to accommodate the subterranean parking garage in the center of the site. The majority of cut will occur inland of the bluff edge. In all, the interior portions of the site (all areas except the Blufftop Park and bluff edge/face) account for 119,600 cubic yards of the approximately 200,000 cubic yards of total cut. This quantity (119,600 c.y.) is consistent with the estimate of approximately 105,000 cubic yards of cut identified in the LCP. The amount of material to be removed from the Blufftop Park (24,300 c.y.) and bluff edge (5,800 c.y.) is the minimum amount necessary to create a suitable walkway and park area, and therefore is allowable under the LCP.

The Commission finds that the proposed grading activities adjacent to the coastal bluff are limited to that which is necessary to implement the Specific Plan, to remove the existing trailer

park, to restore a natural landform appearance within the disturbed area, to provide coastal access improvements, to install required drainage which prevents sheet flow over the bluff face and to construct necessary backbone infrastructure improvements. The applicant is proposing the minimal amount of remedial grading necessary to undertake the above-referenced restoration/protection, public access ramp construction, and drainage improvements in such a way that will minimize the visual effect on the existing bluff landform, as required by Section 9.3.1-1a of the LCP. Therefore, the amount of grading associated with the proposed project is consistent with the grading and landform alteration policies of the certified LCP.

Extent of Grading

The applicant proposes to grade beyond the top of bluff at various points along the project site, as shown on Exhibit 12. In addition, grading of the Blufftop Park area is now proposed, where the extent of grading approved in the Conceptual Plan of the certified LCP did not include the Blufftop Park area. The applicant contends that some amount of grading of the bluff edge was always considered necessary to remove areas of artificial fill and prepare the site for development. They also state that more detailed geotechnical analyses have resulted in a more refined, appropriately engineered grading plan than the originally approved Conceptual Grading Plan.

The applicant's geotechnical consultant has submitted information supporting the need for grading along the bluff edge as proposed. They assert that cut must occur along the bluff edge to remove existing fill, redirect runoff and accommodate the proposed accessway. Based on geologic borings, the depth of artificial fills along the edge of the bluff range from approximately 2' to 10'. While the proposed grading will not remove all artificial fills along the edge, an average of 5' will be removed, or approximately 5,800 cubic yards as shown on Exhibit 11. The geotechnical consultant for the applicant (Law Crandall) states that the removal of this amount of material will ensure stability of the accessway along the bluff edge and improve global stability of the slope. In their letter of February 2, 2000, they state:

"We understand that construction of a walkway near the top of the bluff is currently proposed and that it will primarily be for pedestrian use, but will also be used occasionally by emergency vehicles. As part of the grading for the site, it is proposed to lower the grade near the top of the bluffs in some areas.

For the support of the walkway, we recommend that all of the existing fill beneath the roadway be excavated. To reduce erosion of soils on the bluff, it is recommended that in some locations, the fill soils be removed. In addition, removal of the fill soils will increase global stability of the bluff by reducing the weight on top of the natural materials."

The geotechnical consultants add, "grading plans have been prepared to remove the minimum amount of artificial fill near the edge of the bluff" (Exhibit 13, Letter from Law Crandall dated March 24, 2000). The engineering consultants (The Keith Companies) also state the following in their letter of March 24, 2000 (Exhibit 14):

"It has been our intention to minimize the amount of grading along the bluff given the following requirements set forth in the Local Coastal Program:

1. *Provide ADA access along the entire length of the park*

2. Provide emergency access to service the park and beach
3. Park to be designed such that the drainage be directed on site as opposed to over the bluff
4. Remove trailers and minimize remedial grading necessary to provide safe blufftop conditions
5. Provide a safe and usable public park

Additionally, the applicant's representative (Athens Group) has stated that it was originally anticipated that the Bluff-top Park could be left in a natural, unaltered state. However, at the project-specific design level, it was determined that grading of the bluff-top area was necessary in order to provide a safe and usable park. Also, as stated by the City Manager in a letter dated March 10, 2000,

"The LCP (Policy 3.2.2 and Section 9.3.1) allows for remedial grading due to removal of mobile home basements and foundations, required drainage away from the bluff edge and elimination of the unconsolidated fill. This grading is essential to ensure a safe, usable park along the entire length of the property."

City staff has also pointed out that it was through subsequent negotiations with the City of Laguna Beach Fire Department that the structural requirements of the blufftop accessway were determined. As discussed in a letter from the City of Laguna Beach Fire Chief, the bearing capacity of the accessway along the top of the bluff must be able to accommodate a 40,000-pound fire truck (Exhibit 15). As such, additional grading is required to remove uncertified fill and create an acceptable emergency access road.

The Commission's technical staff concurs with the consultants' analysis in that the proposed grading along the bluff edge will increase global stability, provide a safe and usable park area, meet ADA requirements and provide emergency vehicle access. The Senior Geologist offers the following:

"The grading along the bluff edge is a minor part of the entire grading plan proposed. Nevertheless, it is of concern because it has the greatest impact from a landform alteration perspective. The grading along the bluff edge is necessary if the walkway is to be graded so as to provide access for emergency vehicles and to meet ADA requirements. Additional blufftop grading is being performed to improve drainage, directing it away from the bluff edge, which is probably justifiable from the viewpoint of increasing site stability. Some additional grading does appear to be mostly cosmetic in nature; this involves the smoothing of former building pads to eliminate a "stairstep" appearance to the park. While this grading is more difficult to justify from a "landform alteration" point of view, it involves mostly artificial fill and is minor in scope. Any alternatives for creating a "safe and useable park" also involve cut and fill. An elimination of net export from this area is perhaps feasible, but would likely result in greater landform alteration than grading in the form of cut, and export of excess material."

The need for the proposed grading operations in this location has been well supported by the applicant, their technical staff and the City. In addition, the extent of grading has been reviewed by the Commission's technical staff and found to be acceptable, as conditioned below, from a geologic and engineering point of view. Consequently, the Commission finds the proposed extent of grading to be consistent with the policies of the certified LCP.

Public Views and Building Height

Section 9.3.1-1a of the LCP allows grading to implement the development goals of the Treasure Island LCP. The LCP also requires the applicant to provide three reasonable public view corridors through the resort community, which, while not precluding development within the boundaries of the corridor, will require the maintenance of a preponderance of the existing ocean views (Policy 3.4.2-2). More specifically, the LCP requires the provision of three view corridors totaling 500 linear feet.

This applicant proposes development of the site with a resort, condominiums and single-family residential lots subject to the specified maximum height restrictions and view preservation requirements. A review of the project plans reveals that the approved project conforms to these height restrictions and contains view corridors totaling 550 linear feet (Exhibit 16). As such, the project has been consolidated in the current project submittal, thereby providing a 50' larger view corridor.

The conceptual resort development approved under the LCP occupied a larger building footprint than the proposed project, as illustrated in Exhibits 17 and 18. In addition, in the current project, fifty percent of the proposed buildings along Coast Highway will be below the elevation of the highway. The applicant indicates that a portion of the building area compaction can be attributed to excavation and subterranean development. In addition, the grading plan provides terraced building pads, as required by the LCP. The Commission recognizes that additional grading allows for a "lower" structure. Specifically, the resort entrance with subterranean garage sited adjacent to Coast Highway remains within the building height restriction through considerable site excavation. Nonetheless, the proposed project is consistent with the height requirements of the LCP and allows the applicant to provide greater public viewing opportunities.

Consequently, the amount of grading proposed within the interior of the site is consistent with the certified LCP requirements for height restrictions and public view preservation, as discussed above.

Top of Bluff Delineation and Blufftop Setback

As defined in the certified LCP, the "top of bluff" is the point of the slope profile where the gradient of the ground surface exceeds 45 percent (24 degrees). This definition is illustrated in Figure 4.1.11 of the FEIR for the Treasure Island Destination Resort Community (Exhibit 19).

As previously shown in Exhibit 12, the applicant is proposing to grade beyond what is defined as "top of bluff" in the Treasure Island certified LCP. While the LCP includes policies which require grading activities to be limited to that which is necessary to accomplish certain resource protection and development goals, it does not contain a policy prohibiting grading over the edge of bluff. Nevertheless, when the Commission certified the LCP in 1998, bluff retreat and appropriate blufftop setbacks were of primary concern. The Commission required a twenty-foot (20') "Bluff Retreat Easement" in addition to the proposed twenty-five foot (25') blufftop setback to ensure safety and minimize risks of geologic hazard. At the LCP hearing, the Commission noted that a 20' additional setback would provide greater protection to the park and hotel, while offering greater privacy to the residences.

The applicant has submitted a Tentative Tract Map for the subject site, which identifies the 25' setback and 20' bluff retreat easement. The proposed building footprints are provided on the map. Generally, the Tentative Tract Map demonstrates that the proposed development conforms to the required blufftop setbacks. However, the Commission notes that an improper point of measurement was applied. The setback should be measured from the "top of bluff" prior to proposed site grading, rather than after. (The edge of bluff, or "top of bluff," is measured at the point that the slope breaks at a 45% (24-degree) angle.) As such, a portion of the development is located further seaward than allowable.

All of the proposed structures along the northern and central portion of the blufftop are located at least 45' from the edge of bluff. However, at the southernmost segment of the hotel resort, the structure is sited closer than 45' from the top of slope. It appears as though the "post-grading" top of slope point was used to calculate the required setback. The Commission recognizes that the grading will lower the elevation of the site, thereby providing slightly more building area. To ensure that greater buildable acreage is not created through the sacrifice of bluff face acreage, the Commission must ensure that the "pre-grading" blufftop delineation be applied in all setback determinations.

In the current proposal, the corner of the hotel encroaches approximately 10' into the setback area. As the bluff retreats in this location, the hotel will be subject to increased risks of geologic instability if not sited appropriately. The Commission's geologist states,

"LAW/CRANDALL estimates a bluff retreat rate ranging from 0.25 to 3.5 inches per year, based on comparison of topographic contours derived from 1937 and 1997 surveys. The primary structure closest to the bluff edge, as defined above, is a corner of the main hotel building near it's southern end. This corner is located approximately 35 feet from the bluff edge, near a part of the bluff where some of the highest retreat rates were measured. The highest calculated rate of retreat results in about 22 feet of retreat in 75 years. Although this amount of retreat would not place the structure at risk, it leaves little margin for safety if the calculated retreat rate is in error or if bluff retreat accelerates. Further, bluff retreat at this location would certainly threaten the ADA walkway, and with the existing building setback there is very little room for its relocation. Redesign of this corner of the hotel to increase blufftop setback might be appropriate."

Therefore, the project is inconsistent with the LCP setback requirement and cannot be approved as proposed. To minimize risks from geologic hazard, the Commission imposes Special Condition No. 2, which requires the applicant to submit revised plans, for the review and approval of the Executive Director, demonstrating that the structure has been pulled back to accommodate the 25' setback and 20' Bluff Retreat Easement based on the pre-grading "top of bluff." With this condition, the project is consistent with the LCP setback requirement.

Acreage Inconsistencies Associated with Increased Grading

At the substantial issue hearing, Commission staff recommended that the land use acreages be found in substantial conformance with those approved in the LCP. However, for further clarification, the following section addresses the assertion that there is 0.6 acres less of marine reserve, sand beach and bluff face than indicated in the LCP. In information submitted to the Commission and through subsequent discussions with staff, the appellants state that the

increased blufftop grading provides more buildable land and decreases the size of the park areas. They provide the following comparison of acreages approved in the LCP and currently proposed:

	LCP	Approved Project	Difference
Marine Reserve	3.55 acres	3.31 acres	-0.24 acres
Sand Beach	2.70 acres	2.45 acres	-0.25 acres
Bluff Face	2.94 acres	2.83 acres	-0.11 acres
			-0.60 acres

The City responded to the appellants' claim by stating that the differences are due to a revised certified topographical survey. While the appellants propose that the landowner dedicate the area amounts specified in the LCP, this is physically impossible, according to the City. They provide the following explanation in their letter of March 17, 2000:

"Fixed points determine the area boundaries. For instance, the marine reserve and beach areas are areas encompassed from the toe of bluff face slope to mean high tide. If an updated survey shows smaller amount of land areas due to sand elevation shift, then there are physically smaller areas. Additionally, an independent 3rd party engineer hired by the city confirmed that acreage fluctuations between various topographic surveys are common for coastal properties."

While the Commission recognizes that slightly less acreage will be dedicated to public use, the difference is negligible and has been appropriately mitigated through public benefits elsewhere, including the creation of additional open space between the residential development and the resort. The amount of grading to occur along the blufftop will not result in additional developable area, as the previously-certified blufftop delineation will be applied to the current development, consistent with the intent of the Treasure Island LCP. At the time the Commission certified the LCP, the park setbacks were established based on "top of bluff" determinations, not specific acreage requirements. The 25' setback plus 20' bluff retreat easement established in the LCP will still be used to determine all inland development. As such, the resort and residential portion of the project will not be acquiring additional acreage through grading activities.

Stability of Walkway

Since the substantial issue hearing, supplemental information has been submitted by the applicant's consulting engineer and geologist regarding the stability of the walkway and the bluff retreat rate. In a supplemental consultation letter dated April 19, 2000 (Exhibit 20), the consultant states that some areas of uncertified fill with a thickness of more than 5 feet beneath the proposed walkway will remain even after the proposed grading. Therefore, the consultant recommends the placement of drilled piles to support the walkway. As stated in the supplemental consultation:

"In areas of thick existing fill, where excavation and recompaction would be impracticable, walkways may be supported on drilled cast-in-place concrete piles."

The Commission's technical staff initially questioned the structural design of the ramp and accessway along the bluff edge. The piles required to support the proposed accessway and ramp extend to a depth of 10 feet into the bluff. This need for such extensive engineering of

the pedestrian walkway raises questions about its long-term stability. However, after subsequent consultation with the applicant's consultants, the Commission's technical staff accepted the siting and engineering of the ramp, so long as a condition is incorporated which requires its relocation if necessary. As stated by the Commission geologist in Exhibit 9:

"The slope stability analyses indicate that portions of the upper bluff, especially those where the existing artificial fill is at its thickest, are likely to experience surficial failures and retreat rates more rapid than the 0.25 to 3.5 inches per year calculated above, which was calculated at the 30 and 50 foot contours, below the level of most of the artificial fill. While such surficial failures are not likely to threaten principal structures within their economic lifetime, they will very likely threaten the park, the ADA walkway, access ramps, and drainage control structures. Such failures should be anticipated, and structures that may be threatened by them should be designed so that they may be easily moved landward as the bluff edge encroaches upon them. The CDP should be conditioned to prohibit the construction of shoreline protective devices to protect secondary structures."

In the event that the subterranean structural supports are exposed, the blufftop accessway would present a potential hazard, as well as negative visual impacts from the shoreline. Therefore, the Commission imposes Special Condition No. 3 requiring the applicant to relocate the accessway further inland if necessary.

No Future Protective Device for Resort Facilities or Residential Development

The Treasure Island development site is a blufftop ocean front lot. In general, blufftop lots are inherently hazardous. It is the nature of bluffs to erode. Bluff failure can be episodic, and bluffs that seem stable now may not be so in the future. Even when a thorough professional geotechnical analysis of a site has concluded that a proposed development is expected be safe from bluff retreat hazards for the life of the project if proper drainage controls are implemented, it has been the experience of the Commission that in some instances, unexpected bluff retreat episodes that threaten development do occur (5-84-046 & 5-98-039: Denver/Canter; 5-95-023 & 5-99-056: Bennett; 6-88-515: McAllister). In the Commission's experience, geologists cannot predict with absolute certainty if or when bluff erosion on a particular site may take place, and cannot predict if or when a structure or property may become endangered.

Section 3.2 (Physical Resources Policies) of the Treasure Island certified LCP sets forth policies related to geologic hazard and blufftop development. Policy 3.2.2-1 requires structures for human occupancy to conform to geotechnical design mitigations to minimize risk to life and property. Section 3.2.2-6 requires development adjacent to the coastal bluff to be located and designed to *"minimize the alteration of the existing landform and the construction of artificial devices that...would substantially alter existing landforms..."* The proposed development could not be approved as being consistent with the certified LCP if projected bluff retreat would adversely affect the proposed development and necessitate construction of a shoreline protection device.

The Coastal Act limits construction of protective devices because they have a variety of negative impacts on coastal resources including adverse affects on sand supply, public access, coastal views, natural landforms, and overall shoreline beach dynamics on and off site, ultimately resulting in the loss of beach. The Commission may only allow a shoreline protective structure if: (1) there is an existing principal structure in imminent danger from erosion; (2)

shoreline altering construction is required to protect the existing threatened structure; and (3) the required protection is designed to eliminate or mitigate the adverse impacts on shoreline sand supply.

Bluff retreat rate is discussed in a supplemental consultation prepared by Law Crandall dated April 19, 2000 (Exhibit 20). The annual rate of retreat at the project site was evaluated for a 50-year period with historical records from 1937 to 1997. In their analysis, the consultant states that *"the greatest amounts of erosion over the 50-year evaluation period (1937-1997) were measured in areas where the bluff is composed of terrace deposits and artificial fill and uncontrolled drainage has been allowed to flow over the bluff face."* The report adds, *"the erosion of the bluff can be minimized to less than 0.25 inch per year if proper controls are placed on surface water runoff."* Lastly, the consultant notes the following:

"...there has been very little bluff retreat of the bluff base in areas in which the San Onofre Breccia forms the lower part of the bluff. Furthermore, because the lower part of the bluff is exposed to wave erosion, bluff erosion appears to be much less important than erosion caused by surficial water runoff."

As stated above, the applicant's geotechnical consultant has indicated that the site is stable and that no shoreline protection devices (blufftop structures or seawalls) will be needed. If not for the information provided by the applicant that the site is safe for development, the Commission could not conclude that the proposed development would not in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs. However, the record of coastal development permit applications and Commission actions has also shown that geologic conditions change over time and that predictions regarding site stability based upon the geologic sciences are inexact. Even though there is evidence that geologic conditions change, the Commission must rely upon, and hold the applicant to their information which states that the site is safe for development without the need for protective devices.

Therefore, the Commission imposes Special Condition 4, which requires the applicant to record a deed restriction against the property placing the applicant and their successors in interest on notice that no protective devices shall be permitted to protect the resort facilities and future residential development.

Assumption of Risk

As stated previously, the applicant is proposing the development of a resort and residential community on a 30-acre coastal blufftop lot. There is evidence regionally that coastal bluffs in Orange County are subject to ongoing erosion and that geologic impacts are not always predictable based upon a geologic investigation. Although adherence to the geotechnical consultant's recommendations and the required setback at the time of development will minimize the risk of damage from erosion, the risk is not eliminated entirely. Therefore, Special Condition 5, the standard waiver of liability condition, has been attached as a special condition of approval. By this means, the applicant is notified that the subdivision is located in an area that is subject to wave attack and bluff erosion that can damage the applicant's property. The

applicant is also notified that the Commission is not liable for such damage as a result of approving the permit for development. In addition, the condition insures that the applicant will indemnify and hold harmless the Commission for any damages related to the Commission's approval of the coastal development permit. Finally, recordation of the condition insures that future owners of the property will be informed of the risks and the Commission's immunity from liability.

Conclusion

The Commission recognizes that the proposed project arguably involves grading in excess of the amounts previously estimated in the LCP and proposes grading beyond the delineated bluff edge. The Commission also recognizes that the LCP data was conceptual in nature, pending refinement through the CDP process. For the reasons provided in this section, the Commission finds the project in consistent with the intent of the certified LCP. The Commission further finds that the proposed project is consistent with the grading and landform alteration policies of the certified Treasure Island LCP.

E. Marine Resources

At the substantial issue hearing, the Commission found that the project raised questions of consistency with the marine resource policies of the certified LCP with regard to implementation of the Resource Management Program and designation of the State Marine Park. The Commission found that although the City had approved CDPs for each of these proposed actions, there was no permit condition to CDP Nos. 99-75 or 99-76 requiring they be carried out. Therefore, the Commission must ensure project consistency with the LCP through the current coastal development permit.

Also, because the marine area of the Treasure Island site includes the shoreline seaward out to 1200 feet offshore, the Coastal Act is applied as the standard of review. However, no development below the mean high tide line is proposed as a part of the current permits (A-5-LGB-00-078 and A-5-LGB-00-079). Therefore, the policies of the Treasure Island certified LCP are applied as the standard of review.

Treasure Island LCP Policies

Section 3.1 of the LCP sets forth general marine resources policies for the Treasure Island development. Sections 30230, 30231 and 30235 of the Coastal Act are directly incorporated within this section of the LCP.

Policy 3.1-1 incorporates Section 30230 of the Coastal Act, which states:

Marine resources shall be maintained, enhanced, and where feasible, restored. Special protection shall be given to areas and species of special biological or economic significance. Uses of the marine environment shall be carried out in a manner that will sustain the biological productivity of coastal waters and that will maintain healthy populations of all species of marine organisms adequate for long-term commercial, recreational, scientific, and educational purposes.

Policy 3.1-2 incorporates Section 30231 of the Coastal Act, which states:

The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface water flow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.

Policy 3.1-3 incorporates Section 30235 of the Coastal Act, which states:

Revetments, breakwaters, groins, harbor channels, seawalls, cliff retaining walls, and other such construction that alters natural shoreline processes shall be permitted when required to serve coastal-dependent uses or to protect existing structures or public beaches in danger from erosion, and when designed to eliminate or mitigate adverse impacts on local shoreline sand supply. Existing marine structures causing water stagnation contributing to pollution problems and fish kills should be phased out or upgraded where feasible.

The following policies are also provided in Section 3 of the LCP, supplementing those established in the Coastal Act:

Policy 3.1.2-5 The redevelopment of the LCP shall serve, where possible, to improve conditions on the site and adjacent marine resource areas. To this end, the RMP shall provide for the protection of biological productivity and water quality within the LCP area.

Policy 3.1.2-6 Propose to the State Fish and Game Commission that it designate a Treasure Island Marine Reserve from the shoreline seaward out to 1,200 feet offshore and propose its candidacy for Ecological Reserve status to the State Department of Fish and Game, the State Fish and Game Commission, and the California State Lands Commission.

Chapter 9 of the certified LCP outlines the Resource Management Program (RMP) for the Treasure Island development. The RMP is intended to implement the Resource Protection Policies set forth in Chapter 3. The Marine Resource Management Plan (MRMP) is a component of the RMP. As discussed below, the MRMP contains policies and mitigation measures for the protection and enhancement of the marine habitat at Treasure Island.

Analysis of Marine Resource Issues

According to the Final Environmental Impact Report (FEIR) for the Treasure Island Development, the shoreline features of the project site and vicinity include: "coastal bluffs, rocky headlands, and intertidal rocky outcrops extending seaward from the base of the bluffs, pocket beaches between the headlands, and open coastal sandy beaches located at the eastern and western boundaries of the project area." More specifically, as illustrated in Figure 9.2-3 of the certified LCP, the Treasure Island City-designated Marine Reserve area includes the 3.5 acres of rocky shoreline habitat, 5 acres of sand beach and 31 acres of open ocean and reef habitat

within an approximately 1730' long by 1200' wide stretch of coastline next to the project site (Exhibit 21).

The FEIR states, "*the intertidal area is suggestive of a disturbed intertidal area, possibly from the effects of high visitor use.*" As such, the FEIR incorporates Project Design Features and Mitigation Measures intended to protect, manage and monitor the marine environment. The LCP incorporates the provisions of the FEIR into the policies identified above. Two primary features of the LCP's Marine Resource Protection Requirements are the development of a Shoreline Resources Management Plan and the designation of the coves and tidepools within the Marine Reserve as an Ecological Reserve.

As part of the overall development scenario for the Treasure Island Resort project, the property owner (Five Star Resort, LLC) applied for two City-issued project specific CDPs--the first for a Shoreline (Marine) Resource Management Plan and the second for designation of the site as a State of California Marine Park. The City held multiple public hearings prior to their final determination on each of the proposed projects. On December 1, 1999, the City of Laguna Beach conditionally approved CDPs No. 99-78 and CDP No. 99-79, thereby 1) adopting the Resource Management Plan (RMP), which includes the Marine Resource Management Plan and 2) allowing designation of a State Marine Park (Exhibits 22 and 23). The applicant's proposals were found to be consistent with all applicable provisions of the certified LCP and the Development Agreement for the proposed development. These permits were not appealed to the Commission; therefore the City's actions regarding the RMP and State Marine Park Designation are final.

At the substantial issue hearing, the appellants addressed the adequacy of the Marine Resource Management Plan as it relates to restoration of the degraded marine habitat. However, the Commission recognizes that the LCP did not require restoration as part of the proposed development. While the Commission recognizes that the City-issued CDPs are consistent with the certified LCP, the permits must be linked to the currently proposed project in order to ensure that overall development approved by the Commission will conform to and implement the marine protection provisions of CDP Nos. 99-78 and 99-79.

Implementation of Resource Management Plan

The RMP approved by CDP No. 99-78 requires compliance with the *Treasure Island Marine Resources Management Plan* (MRMP) prepared by Coastal Resources Management, July 1999. The MRMP includes the following components:

- Nominate the Treasure Island Marine Habitats and Resource for designation as a State Marine Manage Area (MMA);
- Design and implement public education and enforcement programs for the MMA;
- Conduct environmental studies in support of the MMA designation process and
- Conduct a five-year marine resources monitoring program to determine the effectiveness of MMA management of the Treasure Island marine resources.

As shown in Exhibit 22, the City incorporated these components of the MRMP as special conditions of CDP No. 99-78. Conditions require management of marine resources to minimize

visitor impacts, including enforcement of no-take regulations, establishment of a signage program, education of the public and resort guests and monitoring the resources to help prevent environmental degradation. The RMP ensures monitoring and policing of marine resources 24 hrs/day, 7 days/week and also requires the applicant to pay for the cost of all engineers, geologists, archaeologists, paleontologists or other similar authorities or specialists required by the Mitigation Monitoring Program. The Mitigation Monitoring Program involves a 5-Year program to evaluate the effectiveness of the designation, signage and enforcement of Reserve policies on the marine resources. Also, the CDP requires the applicant to dedicate the public open space (including the marine reserve and sand beach) and construct the planned public and visitor serving facilities prior to construction of residential development and prior to or concurrently with the private resort development.

The RMP is inadequate to monitor the effects of storm water on the offshore habitat. As such, the development approved by the current Commission action would potentially contribute to an adverse affect on the marine reserve area. More specific testing is required to identify effects of stormwater runoff on the marine environment. Therefore, the Commission imposes Special Condition No. 9, which requires the applicant to submit a Stormwater Monitoring Plan that include methods for acquiring the type of data necessary and appropriate to allow for analysis of stormwater impacts, if any, on the marine resources. (Water quality effects on marine resources will be further discussed in the subsequent section.)

Complete funding has not been committed to implementation of the RMP. However, the City was presented a detailed cost proposal for implementation of the MRMP in November 1999 and the City Manager has indicated that the required funds to start the first component of the Plan are included in the City's budget for the 2000-2001 fiscal year. Funding must be budgeted annually.

The Commission recognizes that the RMP is an important component of the Treasure Island Project. The offshore resources must be preserved and protected wherever possible. The RMP includes provisions to accomplish the goals of the LCP. Therefore, the Commission imposes Special Condition No. 6, which requires the applicant, in concurrence with the City, to implement the adopted RMP as a condition of project approval.

State Designation of Marine Park

CDP No. 99-79, which authorized the City to pursue the designation of a State Marine Park, was conditionally approved by the Laguna Beach City Council on December 1, 1999 (Exhibit 23). As stated earlier, this approval was not appealed. However, at the substantial issue stage for CDP Nos. 99-75 and 99-76 in April 2000, the appellants noted that the site had not yet been nominated for State Marine Park designation. According to the City, the State Department of Fish and Game (DFG) is currently reconstructing their classification system in a manner which may affect the Treasure Island application process. As such, the City has held off in submitting the application until the classification system has been finalized. Commission staff has confirmed this through telephone conversations with staff of the DFG and recognizes that the changing process may have affected the City's decision to submit an application at an earlier date. However, the Commission recognizes that designation as a State Marine Park is an essential part of the proposed project and therefore imposes Special Condition No. 6. This condition requires the applicant to nominate the Treasure Island offshore site, as depicted in Exhibit 21, to the State Department of Fish and Game for designation as a State Marine Park.

While this does not guaranty that the site will be designated, it at least guaranties that the site will be nominated, as required by the certified LCP.

Conclusion

Implementation of the Marine Resource Management Plan, as revised to include monitoring of stormwater runoff, and guaranteed nomination of the State Marine Park, will maintain and protect the marine habitat at the subject site. Therefore, as conditioned, the Commission finds the proposed project to be in conformance with marine resource polices of the certified LCP.

F. Water Quality

At the substantial issue hearing, the Commission found that the City's approval of the Treasure Island development raised no substantial issue of consistency with the water quality policies and standards set forth in the certified LCP. The Water Quality Management Plan (WQMP) and supplemental water quality measures, referred to as "*Attachment A*," were determined to be sufficient to mitigate any potential adverse effects on water quality that may result from the proposed project (Exhibit 24). Nonetheless, this section provides a supplemental analysis of water quality issues and evaluates the effectiveness of the measures proposed by the applicant. Further review has identified the following items requiring additional analysis: nuisance flow diversion, jurisdictional responsibility for future amendments to CDP, and effects on marine resources.

Treasure Island LCP Policies

Section 3.1.1 of the LCP identifies policies for water quality management for the Treasure Island development. As illustrated below, Policies 7 through 13 pertain to the current application:

- | | |
|------------------------|--|
| <i>Policy 3.1.1-7</i> | <i>A Water Quality Management Plan (WQMP) shall be prepared for the LCP Area in accordance with Orange County's Drainage Area Management Plan, and LCP Chapter 11.</i> |
| <i>Policy 3.1.1-8</i> | <i>All drainage facilities and erosion control measures within the LCP Area shall be designed and constructed to protect coastal/marine resources in accordance with the Orange County Flood Control District Design Manual and Title 22, "Excavation, Grading and Filling," of the Laguna Beach Municipal Code.</i> |
| <i>Policy 3.1.1-9</i> | <i>Urban Runoff from the LCP Area shall comply with all existing and applicable Federal, State, and local water quality laws and regulations.</i> |
| <i>Policy 3.1.1-10</i> | <i>An Erosion Control Plan shall be prepared by a registered Civil Engineer prior to any construction within the LCP area, in accordance with Title 22, "Excavation, Grading and Filling," of the City of Laguna Beach Municipal Code.</i> |

- Policy 3.1.1-11 A Storm Water Pollution Prevention Plan (SWPPP) shall be prepared by a registered Civil Engineer. This SWPPP shall comply with the State Water Resources Control Board's General Construction Activity Storm Water Permit.*
- Policy 3.1.1-12 Sediment basins (e.g. debris basins and/or silt traps) shall be installed in conjunction with all initial grading operations and shall be maintained throughout their intended lifetimes to remove sediment from the surface runoff.*
- Policy 3.1.1-13 As applicable, final designs for grading and excavation projects shall:*
- a) include measures to protect water quality in adjacent areas during construction and maintenance activities;*
 - b) be consistent with Section 404 of the Federal Clean Water Act (formerly Federal Water Pollution Control Act) and Section 10 of the Federal Rivers and Harbors Act of 1899; and*
 - c) not adversely affect water quality or marine habitats.*

In addition, Policy No. 15 of the Flood Control and Hydrology Policies of Section 3.1.2 states the following:

- Policy 3.1.2-15 Structural water quality protection measures shall be provided for on-site drainage of paved areas. Structural measures may include oil/water separators, filters, greenbelt strips, and/or other equivalent methods.*

Analysis of Water Quality Issues

The Implementing Actions Program (Specific Plan) of the Treasure Island LCP contains a Resource Management Program (RMP) which provides implementing measures to uphold the policies identified above. Consistent with Section 9.3.2. of the Resource Management Program, subsection (2), the applicant has submitted a *Water Quality Management Plan (WQMP)*, dated June 22, 1999 which identifies "specific source control measures (i.e. Best Management Practices or 'BMPs') to reduce the discharge of pollutants to stormwater facilities during all phases of project development." In addition, the applicant has submitted an attachment referred to as *Attachment A*, which further specifies and augments the Treasure Island WQMP (Exhibit 24).

Water Quality Standards Governing the Project

The project is subject to regulations of other governing agencies with regard to stormwater runoff associated with new development during and after construction. Relevant permits include the County of Orange Municipal NPDES Stormwater Permit No. CA 8000180 and the State Water Resources Control Board (SWRCB) NPDES General Permit No. CAS000002, Waste Discharge Requirements (WDRs) for Discharges of Storm Water Runoff Associated with Construction Activity, as described below.

The WQMP and the proposed water quality measures specified in *Attachment A* are consistent with the provisions of the County of Orange Municipal NPDES Stormwater Permit No. CA

8000180, issued to the County of Orange and co-permittees, including the City of Laguna Beach, and the Orange County Drainage Area Management Plan (OC DAMP), submitted to the Regional Boards for compliance with the NPDES permit by the County and co-permittees. The OC DAMP is essentially the implementing program for the NPDES permit. It was developed based upon the principle criterion identified in the NPDES permit, that being the term Maximum Extent Practicable or "MEP." The NPDES permit defines "MEP" as follows:

"MEP" means to the maximum extent practicable, taking into account equitable considerations of synergistic, additive, and competing factors, including but not limited to, gravity of the problem, fiscal feasibility, public health risks, societal concern, and social benefits."

The co-permittees have the responsibility of weighing economic, societal and equity issues as they define the policies and standards to be employed in implementing the OC DAMP program.

The OC DAMP includes a section focused on New Development Control (Section 7.0), which requires new development (such as Treasure Island) to incorporate non-structural, routine structural, and special structural BMPs *"to minimize the amount of pollution entering the drainage system."* The following are examples of each type of BMPs, proposed for incorporation per *Attachment A* into the Treasure Island Development (not a complete list):

Non-structural: Fertilizer and Organic Soils Management, street sweeping and litter pick-up

Routine structural: Inlet trash racks, trash enclosures, energy dissipaters, irrigation technology (drip irrigation, flow sensors, rain shutoff devices) and landscape filtration (surface runoff from park and hotel courtyard directed to permeable landscaped areas)

Special structural: Nuisance flow diversion, storm drain sediment & hydrocarbon separator devices, water quality inlet media filters

Section 4.2 of the *Mitigation Monitoring Program for the Treasure Island Resort Community Environmental Impact Report*, adopted in full as standard conditions of approval by the City of Laguna Beach in CDP 99-75, and incorporated by reference in Section IV (A) of the current report, contains Standard Condition 2-3 which states the following:

SC-2-3 Water Quality Management Plan. Prior to issuance of a grading permit, a Notice of Intent (NOI) to comply with provisions of the State Water Resources Control Board's General Construction Activity Storm Water Pollution Prevention Plan (SWPPP) will be prepared by a registered civil engineer and will be available on site throughout construction activities.

Prior to issuance of building permits or precise grading permits, whichever comes first, the applicant shall submit for approval by the Director, City of Laguna Beach Community Development Department, a Water Quality Management Plan specifically identifying Best Management Practices (BMPs) and other appropriate structural measures that will be used on site to control predictable pollutant runoff.

This plan shall identify the structural and non-structural measures whenever they are applicable to the project and the assignment of long-term maintenance responsibilities (specifying the applicant, parcel owner, maintenance association, etc.) and shall reference the location of structural BMPs. These source control measures shall include such devices as oil/water separators, filters, first flush diversion, infiltration trenches, or other methods as approved by the Director, City of Laguna Beach, Community Development Department.

Pursuant to Condition 34 of Resolution No. 98.033, the Water Quality Management Plan shall be required prior to approval of the final tract map. The Landowner/ Master Developer shall construct a system to divert summer nuisance water to the sewer system upon concurrence by the water agency with jurisdiction over the project site. All of the site's non-residential landscape irrigation shall utilize a reclaimed water distribution system, which shall be reviewed and approved by the water agency with jurisdiction over the project site. Storm drainage inlets on Coast Highway shall be designed to accept 100 year flows, and the on-site drainage system must accept and convey 100 year flows from Coast Highway through the site to the beach. In addition, the on-site drainage system shall be designed for a 100-year storm event in order to reduce blufftop erosion.

At the substantial issue stage, the appellants raised the issue of Best Available Technology "BAT", which is associated with the State Water Resources Control Board (SWRCB) NPDES General Permit No. CAS000002, Waste Discharge Requirements (WDRs) for Discharges of Storm Water Runoff Associated with Construction Activity. This permit is applicable to stormwater discharges associated with construction activity, which result in disturbance of 5 or more acres of land. Regulations, where applicable, require the discharger to obtain coverage under the State General Construction Activity Permit and to implement Best Available Technologically Achievable (BAT) and Best Conventional Pollutant Control Technology to reduce or eliminate storm water pollution. As previously stated, the Commission did not find substantial issue with regard to water quality.

The current project involves 30-acres of land and therefore is subject to the above-referenced NPDES permit for stormwater discharges associated with construction activity. Standard Condition 2-3 of the *Mitigation Monitoring Program* requires an NOI to comply with the provisions of the State Water Resources Control Board's General Construction Activity Storm Water Pollution Prevention Plan to be prepared by a registered civil engineer, which will be available on site throughout construction activities.

The Commission finds that the applicant's compliance with the provisions of the SWRCB General Construction Activity Permit, required by conditions incorporated by reference here, will serve to control pollutants in stormwater discharge associated with construction activity in a manner consistent with the certified LCP. Additionally, the Commission finds that the applicant's compliance with the provisions of the County of Orange Municipal NPDES Stormwater Permit through their implementation of the WQMP and water quality measures, as conditionally approved below, is consistent with the applicable policies of the certified LCP.

Dry Weather Nuisance Flow Diversion

At the substantial issue phase, the appellants acknowledged that the project included a plan to divert the project's nuisance flows, but contended that an agreement between the City and local sanitation district had yet to be reached. The City originally responded to these contentions by stating, "*the City has the responsibility for sewage treatment, and...our treatment facility has the capacity to process the low flow storm water and the flows from 'first flush' events.*" City staff also pointed out that implementation of water quality measures #1-10 contained in *Attachment A* was a condition of approval of the subject development and Measure # 6 specifically requires nuisance flow diversion. However, the Commission recognizes that the intent of this particular measure is uncertain as proposed, due to the use of a variety of non-synonymous terms interchangeably, as discussed below.

The measure proposes "Dry Weather Diversion." Flows occurring during "dry weather" are typically those associated with nuisance runoff (nuisance runoff includes flows from irrigation, car washing, and light precipitation). Nuisance flow that occurs during dry weather, is however, defined parenthetically in *Attachment A* #6 as "when rainfall is less than $\frac{3}{4}$ of an inch on the site during a 24-hour period". The intent behind the proposed measure is further confused when the language then specifies that the diversion system will be designed to "allow the City to process the *first flush* and will extend the nuisance diversion up to the capacity of the sewer system on a year round basis". Commission staff has since confirmed that it is the applicant's intent to divert dry weather nuisance flow (estimated to be approximately 5,000 - 6,000 gallons per day) from the project site and from the 60 acre neighborhood above the development to the wastewater collection system for ultimate treatment in the Coastal Wastewater Treatment Plant on a year-round basis (Exhibit 25).

To ensure that the nuisance flow diversion measure can and will in fact be implemented, Commission staff has contacted the General Manager of the South Coast Water District. Through verbal and written communication, he has confirmed that capacity currently exists at the treatment plant to accept the nuisance flow and has stated that the District will commit to accepting up to 10,000 gallons per day year round from the Treasure Island development site once the facilities have been upgraded accordingly (Exhibit 26).

In order to more clearly define the requirements of the proposed nuisance flow diversion measure, the Commission finds it necessary to impose Special Condition No. 7. This condition requires the applicant to obtain a statement from the South Coast Water District, verifying the District's capacity and commitment to accept nuisance flow runoff (up to a maximum of 10,000 gallons per day (GPD), on a year-round basis from the Treasure Island site, and the 60 acre drainage area above the site, upon project completion, for treatment in the wastewater collection system at the Coastal Wastewater Treatment Plant. Diversion shall commence upon completion of the project, and prior to the opening of the resort, and shall continue for the life of the development.

The Commission finds that the applicant's compliance with Special Condition No. 7, which more clearly defines the proposed Measure # 6 of *Attachment A*, will further ensure that the proposed development is in compliance with LCP provisions which address the control of urban runoff from the development. As such, the applicant will be required to divert nuisance flows on a year-round basis in accordance with the provisions of the Treasure Island certified LCP.

Responsible Entity for Sewer, Storm Drain and Diversion and Sediment Removal Systems

If any changes to the Nuisance Flow Diversion agreement specified above in Special Condition No. 7 are proposed, an amendment to the current coastal development permit is required. The Commission imposes Special Condition No. 8 to ensure that the appropriate entity is granted the authority to handle the amendment. The amendment will be handled by an entity granted the authority to act on behalf of the Homeowners Association and the Resort Owner/Operator in all matters pertaining to sewer, storm drain and diversion and sediment removal systems at the project site.

Water Quality Effects on Marine Resources

The applicant has included the document, *The Marine Biological Resources and Impact Assessment, Treasure Island Destination Resort Community*, prepared by Coastal Resources Management, for LSA Associates Inc. as part of the *Marine Resources Management Program* for the proposed project.

Section 3.2 of the Impact Assessment discusses Operational Impacts associated with long-term operation of the Resort Center on shoreline resources. Stormwater discharge is identified as a potential source of adverse impact on shoreline resources. Mitigation measures proposed to offset potentially significant impacts to marine resources include the preparation of a Shoreline Resource Management Plan (now referred to as the Marine Resources Management Plan). In addition to the proposed components of the Plan, a set of Recommended Details is included, which recommends that monitoring studies be conducted. The recommendation states, "*The purpose of this monitoring program will be to document the effectiveness of the designation, signage, and the enforcement of the Reserve policies on intertidal and subtidal marine life. This program will also assist in determining the impacts, if any, of stormwater discharges into the Reserve from the proposed drainage plan.*"

In order to fully implement PDF 4-2 and comply with the provisions of the Treasure Island Draft and Final EIR, Appendix D, Volume II of the Draft EIR (Marine Resources), and the Treasure Island LCP Part III- IAP, Section 9 Marine Resources, the *Marine Resources Management Plan*, (formally referred to as the Shoreline Resources Management Plan), the Commission requires that the applicant carry out a more extensive 5-year monitoring program focused on the rocky intertidal and subtidal resources of the Marine Reserve. The Commission finds the currently proposed 5-Year Marine Resources Monitoring Plan is not sufficient to uphold the recommended objective contained in the Impact Assessment—that being to determine impacts, if any, of stormwater discharges into the Marine Reserve from the proposed Drainage Plan.

Therefore, Special Condition No. 9 requires the preparation of a 5-Year Stormwater Monitoring Plan to accomplish this particular research objective. The plan should be prepared and/or reviewed by a qualified professional with expertise in the field of coastal water quality monitoring associated with stormwater discharge. The Plan should include methods for acquiring data appropriate to analyze the impact of stormwater on the marine resources in the City-designated Marine Reserve.

Update Water Quality Management Plan (WQMP)

Special Condition No. 10 requires that the Treasure Island Water Quality Management Plan (*WQMP*), dated June 22, 1999, be updated and revised to incorporate the water quality measures contained in *Attachment A* (Exhibit 24), and to be made consistent with all final

conditions imposed by the Commission pertaining to the project's overall water quality management program. This will include clarification of the dry weather diversion program and discussion of the study to determine the effects of stormwater discharges into the marine reserve.

Conclusion

Commission staff has reviewed the Water Quality Management Plan (WQMP) for Treasure Island prepared in June 1999, as well as the additional water quality measures and supplemental information provided by the applicant. The Commission's water quality staff has reviewed all proposed and conditionally imposed water quality measures and recommends three (3) additional special conditions to ensure that the proposed development does not adversely affect water quality. The conditions include acceptance of the nuisance flow diversion, revision of the WQMP, and appropriate monitoring of stormwater effects on the marine environment. As conditioned, the Commission finds that the Treasure Island project is in conformance with the water quality policies outlined in the certified LCP.

F. Public Access

Section 30604(c) of the Coastal Act requires that every coastal development permit issued for any development between the nearest public road and the sea include a specific finding that the development is in conformity with the public access and public recreation policies of Chapter 3. The proposed development is located between the sea and the nearest public road. Additionally, the Commission must evaluate the project's consistency with the public access and recreation policies of the certified LCP.

Section 30210 of the Coastal Act states, in pertinent part:

...maximum access, which shall be conspicuously posted, and recreational opportunities shall be provided for all the people consistent with public safety needs and the need to protect public rights, rights of private property owners, and natural resource areas from overuse.

Section 30213 of the Coastal Act states, in pertinent part:

Lower cost visitor and recreational facilities shall be protected, encouraged, and, where feasible, provided. Developments providing public recreational opportunities are preferred.

Section 30252(6) states:

The location and amount of new development should maintain and enhance public access to the coast by...(6) assuring that the recreational needs of new residents will not overload nearby coastal recreation areas by correlating the amount of development with local park acquisition and development plans with the provision of onsite recreational facilities to serve the new development.

As they apply to the current project, the Treasure Island LCP contains the following policies related to public access and recreation:

- Policy 4.2.1-1 Lateral and vertical public coastal access and recreational opportunities shall be established within the resort development area and on open space, conservation, and recreation lands proposed for dedication to the public, including the Bluff-top Park, Sand Beach, and Marine Reserve.*
- Policy 4.2.1-6 Lower cost recreational uses, visitor-serving uses, and public access opportunities have priority over private residential uses.*
- Policy 4.2.2-1 Continuous opportunities for public upcoast and downcoast observation shall be provided by a continuous walkway and appropriately located overlook within the Bluff-top Park, along the new southerly ramp down to the Sand Beach, along the existing northerly ramp and stairway down to the Marine Reserve, and from various public areas within the Resort Center.*

The certified LCP also provides the following circulation policy, which addresses the public pedestrian walkway along the bluff edge:

- Policy 5.2.2-6 A public pedestrian walkway shall be improved to connect the new public pedestrian walkway adjacent to Coast Highway and the new public parking spaces within the south end of the Bluff-top Park/Resort Center to the oceanfront walkways and major landscaped areas of the Bluff-top Park and, via a new ramp, down to the Sand Beach.*
- Policy 5.2.2-7 The walkway described in (6) above shall be designed so as to:*
- a) be usable by City and/or County beach maintenance and emergency access vehicles, and*
 - b) be usable, either by itself and/or in conjunction with a parallel wheelchair ramp of reduced slope, to provide disabled persons...access to the Sand Beach.*

At the substantial issue hearing stage, the appellants contended that the project does not provide "lower cost visitor and recreational facilities," or sufficient public recreational opportunities. The project provides a 3.31 acre marine reserve, a 2.45 acre sandy beach and a 7.51 acre public blufftop park. Historically, the entire site was off-limits to the public. With the proposed project, there will be pedestrian access and public parking. Parking fees at the subject site may not exceed the rate charged at adjacent beaches.

As proposed, the project will provide the following public amenities:

- 275 room hotel
- 5.76 acres of beach that is presently privately owned
- 7.51 acres of public park and open space with about 70 park benches, walking paths and view vantage points
- 70 public parking spaces with City regulated rates
- Four accessways to the beach
- Two public restroom facilities with showers
- A restaurant near the bluff and a second restaurant in the hotel
- A Marine Park with a Resource Management Plan to protect marine resources

- A landscape buffer along the entire frontage of the sit that includes a public pathway and a rest stop for pedestrians and cyclists using Coast Highway

The Commission finds that the project is consistent with the public access provisions of both the certified LCP and the Coastal Act, as it provides an appropriate distribution of lower cost recreation and visitor serving commercial uses at a site that was previously inaccessible to the public. Additionally, the amenities provided in the proposed project are in conformance with the Public Access and Recreation Plan illustrated in Figure 10.2-2 of the LCP and outlined in the LCP policies (Exhibit 27). The approved project provides public park land, public parking facilities and a resort hotel (including guest rooms, ballrooms, function rooms and meeting facilities), and conveys a fee interest in a privately owned sandy beach to the public.

In reviewing the public access provisions of the certified LCP in relation to the approved project, the Commission finds that the project is consistent with the policies and standards set forth in both the certified LCP and the Coastal Act. Therefore, the Commission finds the project consistent with Treasure Island LCP policies related to public access and recreation and Sections 30210, 30212, 30213 and 30252(6) of the Coastal Act.

H. Scenic and Visual Resources

Chapter 9 (Resource Management Program) of the LCP outlines objectives and criteria to implement the policies contained in Chapter 3 (Resource Protection Policies). At the substantial issue hearing stage, the appellants challenged conformance with the following RMP objectives as they pertain to coastal views:

Section 9.1.2-4 Provide and improve the adjacent portion of the Coast Highway Scenic Corridor to protect and enhance the existing public streetscape and views of the site and coastline.

Section 9.1.2-5 Provide three reasonable public view corridors through the resort community which while not precluding development within the boundaries of the corridor will require the maintenance of a preponderance of the existing ocean views through a constant-width corridor from residences above the Aliso Creek Plaza Shopping Center, Coast Highway, and Fred Lang Community Park.

Section 9.5 (Visual and Scenic Resource Protection Requirements) provides implementation measures for the protection of views and scenic resources. As stated above, the LCP requires the provision of three (3) public view corridors totaling 500 linear feet. The proposed project meets this requirement by providing two (2) view corridors totaling 550 linear feet, where two previously separate corridors are combined to form one larger corridor along the southern end of the property (Exhibit 16). As such, the project has been consolidated in the current project submittal, thereby providing a 50' larger view corridor. Viewing opportunities of the coastline are also available throughout the project site.

Section 11.3 (Building Height Regulations and Standards) of the LCP sets forth maximum height envelopes for the Treasure Island development. The project plans demonstrate that the proposed project conforms to these height limitations. In fact, only fifty percent of the structures

are proposed at an elevation above the Coast Highway frontage, whereas the LCP would allow up to seventy percent. In addition, the plans show that the project occupies less building site coverage than originally allowed through the certified LCP. Although the Resort Development Standards clearly state that there is no maximum building site coverage for the Resort Center Area, a more consolidated project is now proposed. As such, the project is preferable in that a more open space and greater public views are provided.

Although some obstruction of existing coastal views will occur, the Commission finds the proposed project to be consistent with the visual and scenic resources protection policies and standards of the certified LCP.

I. Community Character

The certified LCP contains the following policies related to community character and design:

Policy 6.2.1-1 The design of the Resort Center Hotel structures shall fall with the level of Coast Highway and the existing topography. Multi-storied structures, including all projections and appurtenances, shall be varied in vertical and horizontal dimensions so that building heights, setbacks, and site coverages provide visual interest and an interplay of light, shadow, and materials appropriate to the building forms. The combination of building heights, site coverage, and setbacks should, where possible, break up building mass and create a terraced effect by placing lower structures in front of higher structures.

Policy 6.2.2-2 The Resort Center architecture shall be distinctive and provide a signature statement for the Laguna Beach community—projecting the resort's significance for business meetings and community banquets.

Policy 6.2.2-3 To accommodate the guest rooms and required meeting/banquet space within the vertical and horizontal limits of the sites, the resort shall step down from the level of Coast Highway to the elevation of the Bluff-top Park.

a) The architecture of the Resort Center shall be set back at least 25 feet from the bluff edge, and step down in increments which emulate the three dimensional character of the existing slope.

Policy 6.2.2-11 The architectural character of the Resort Center shall be distinctive and outlined in design guidelines that shall be set forth, at least generally, in the LCP's Implementing Actions Program (Specific Plan).

Policy 14.2.1 ...Throughout the resort, there is an intent to provide a village scale by attention to detail and a general pedestrian orientation.

Policy 14.2.2 The architectures will be a mix of styles and forms drawn from eclectic architectural tradition of Laguna Beach and seaside resort areas.

- Policy 14.2.3 ...An emphasis on natural materials, such as wood, tile, stone and cement plaster and a strong relationship between indoor and outdoor spaces is encouraged...*
- Policy 14.4 The architecture of the Resort Center should provide a distinctive image and blend comfortably with the natural features of the site, including a horizontal and stepped-back design and an abundance of landscaping.*
- Policy 14.4.2-4 Long continuous rows of buildings should be avoided. The hotel structure should be broken by open spaces, varied roof treatments or staggering of individual units. Buildings that maximize permitted heights should contain elements with heights less than the maximum and incorporate more than the minimum setback.*

At the substantial issue hearing stage, the Commission recognizes that issues of design are largely subjective and are not a precedential issue of statewide concern. The Commission does not generally question design decisions which are local in nature. In addition, regardless of any issues of conformity with advisory, non-binding guidelines, the project plans are consistent with the development standards and policies of the certified LCP. Consequently, the Commission finds the proposed project consistent with the development standards related to height, bulk, setback and view corridor requirements of the Treasure Island certified LCP.

J. Local Coastal Program

Section 30604(a) of the Coastal Act provides that the Commission shall issue a coastal development permit only if the project will not prejudice the ability of the local government having jurisdiction to prepare a Local Coastal Program which conforms with the Chapter 3 policies of the Coastal Act.

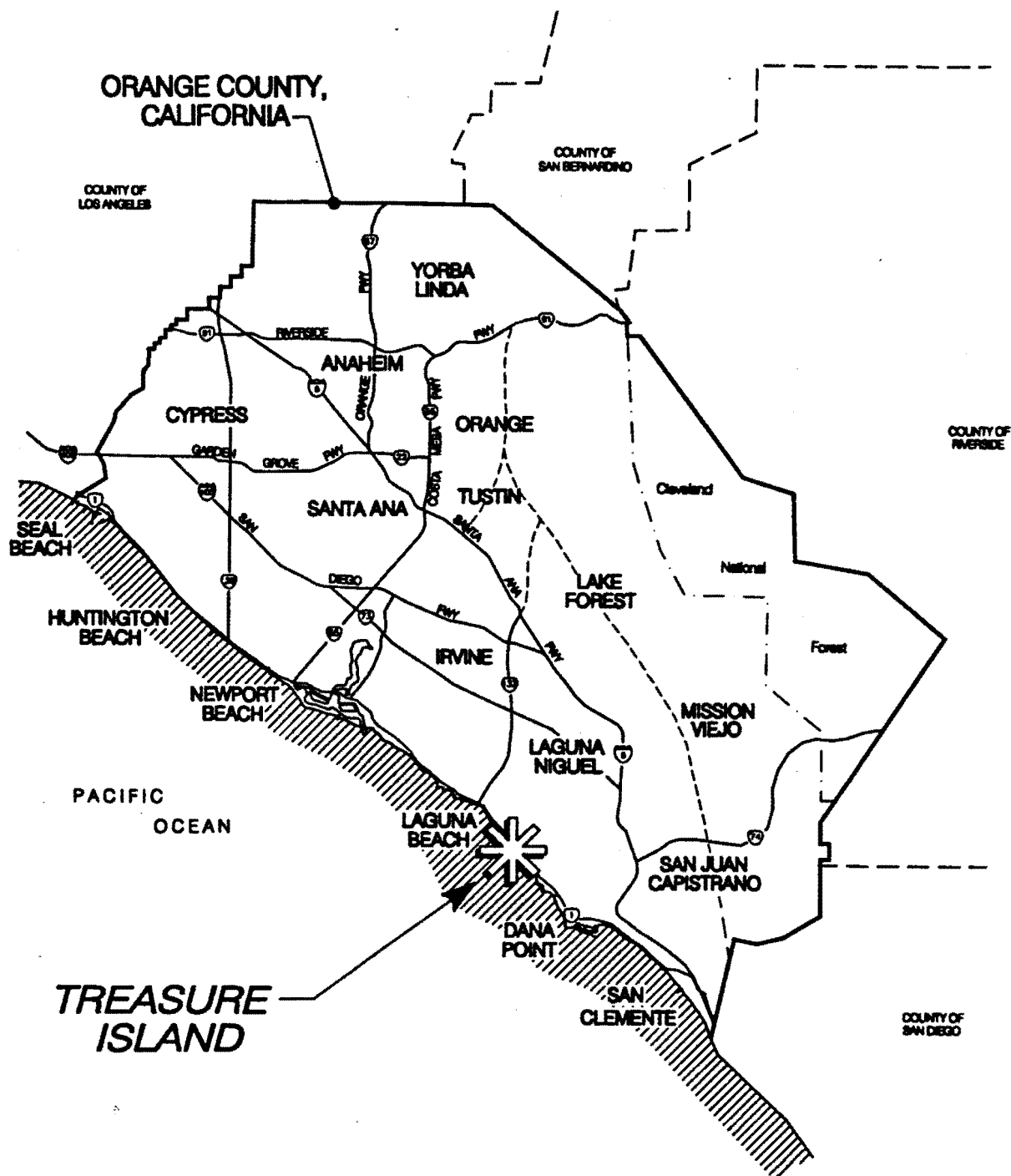
On August 13, 1998, the Treasure Island Local Coastal Program (LCP) was approved as a project specific amendment to the City of Laguna Beach Local Coastal Program. The site was previously an Area of Deferred Certification pending the resolution of public access concerns.

K. California Environmental Quality Act

Section 13096 of the Commission's regulations requires Commission approval of Coastal Development Permit applications to be supported by a finding showing the application, as conditioned by any conditions of approval, to be consistent with any applicable requirements of the California Environmental Quality Act (CEQA). Section 21080.5(d)(2)(A) of CEQA prohibits a proposed development from being approved if there are feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse effect which the activity may have on the environment.

The proposed project has been conditioned in order to be found consistent with the applicable policies of the Treasure Island certified LCP. As conditioned to require 1) retention of the local government conditions of approval; 2) submittal of revised plans demonstrating conformance with the required blufftop setback; 3) relocation of the blufftop accessway as needed; 4) recordation of an assumption-of-risk deed restriction; 5) implementation of the Resource

Management Plan (RMP) and nomination of the State Marine Park; 6) grant of responsibility for sewer, storm drain and diversion; 7) a written agreement for acceptance of low flow diversion of project runoff; 8) submittal of revised Marine Resources Monitoring Plan and 9) submittal of revised Water Quality Management Plan (WQMP), there are no feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse impact which the activity may have on the environment. Therefore, the Commission finds that the proposed project, as conditioned, can be found consistent with the requirements of the Coastal Act to conform to CEQA.



COASTAL COMMISSION

A-5-00-078/A-5-00-079

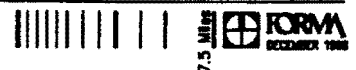
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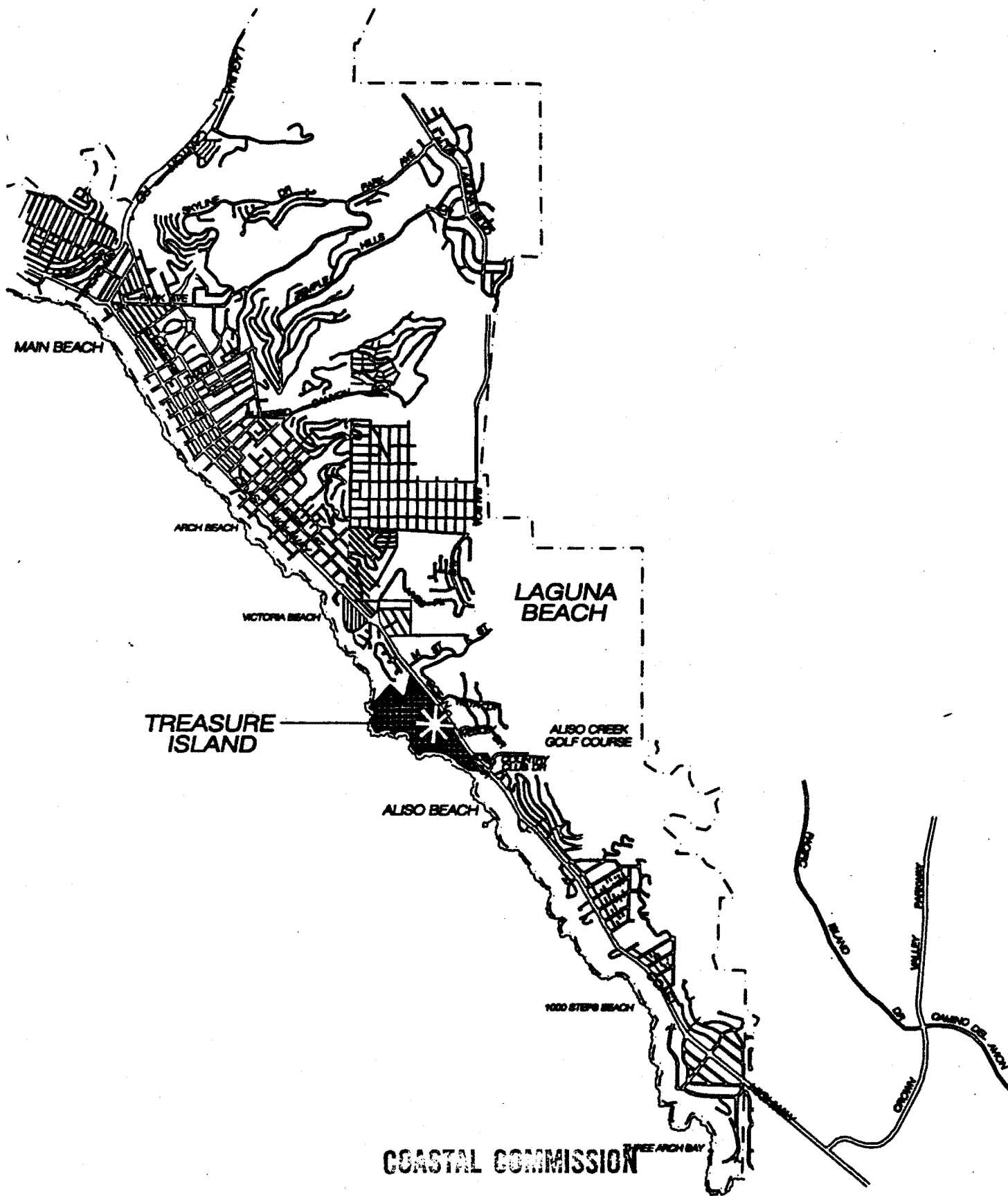
PAGE 1 OF 1

Figure 1.1-1
REGIONAL LOCATION MAP

Treasure Island
LAGUNA BEACH, CALIFORNIA

Local Coastal Program





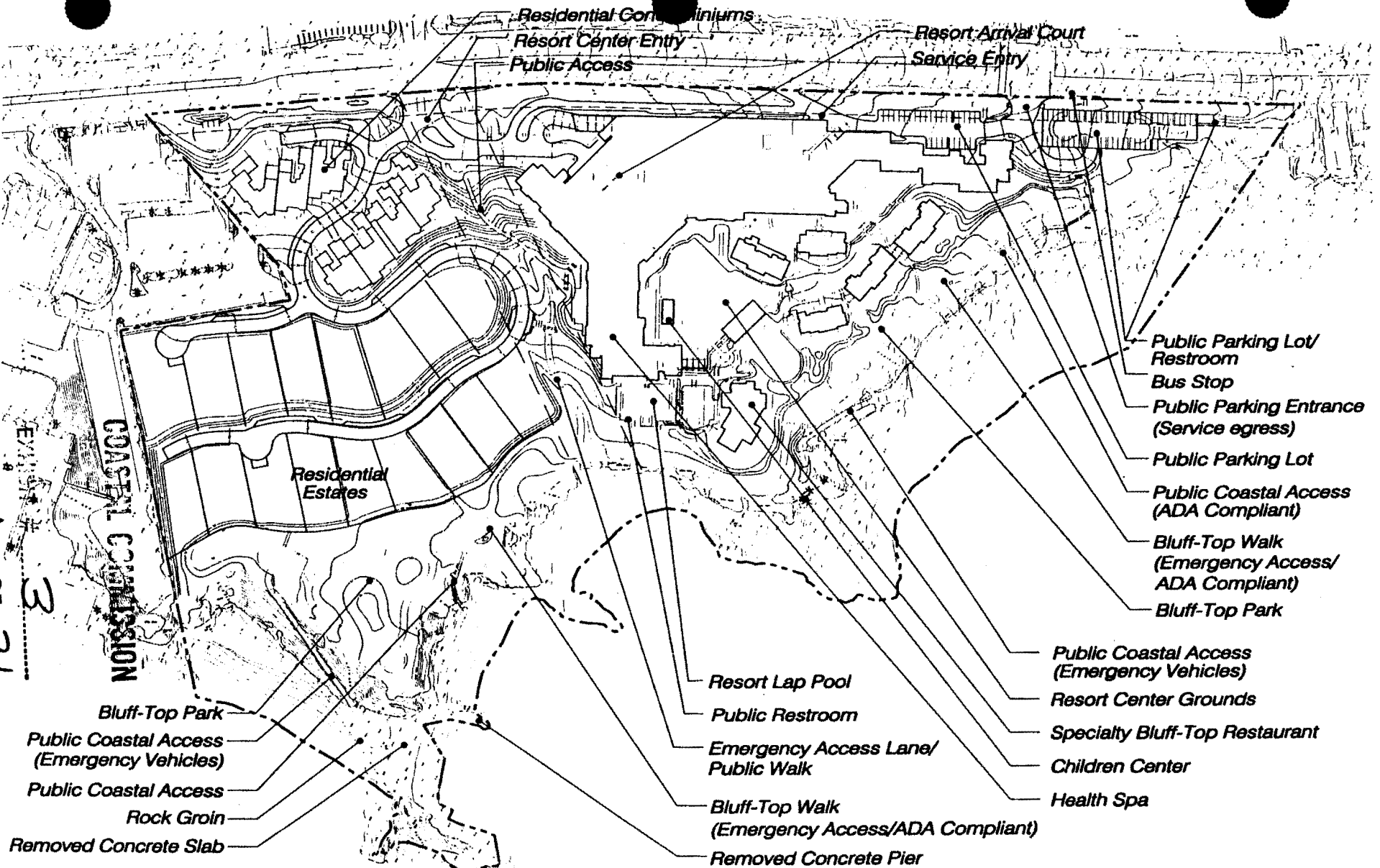
Treasure Island
LAGUNA BEACH, CALIFORNIA

EXHIBIT # 2
PAGE 1 OF 1

Figure 1.1-3
VICINITY MAP

Local Coastal Program



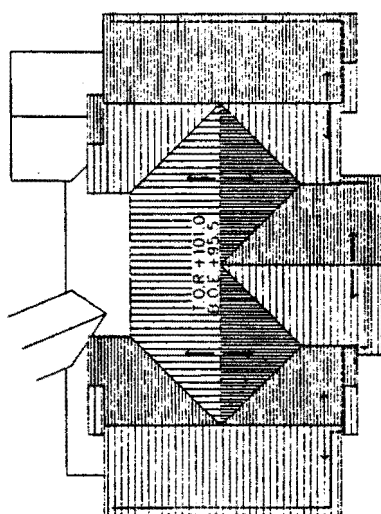


Treasure Island
 LAGUNA BEACH, CALIFORNIA

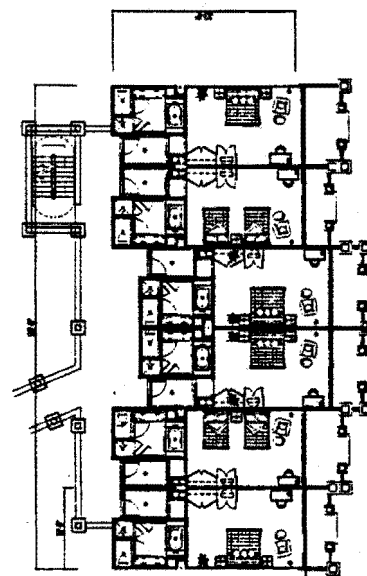
The Athens Group

Figure 2.1
SITE DEVELOPMENT PLAN
 COASTAL DEVELOPMENT PERMIT





ROOF PLAN



FLOOR PLAN

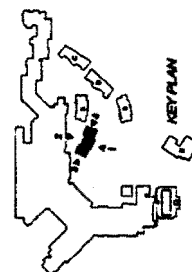
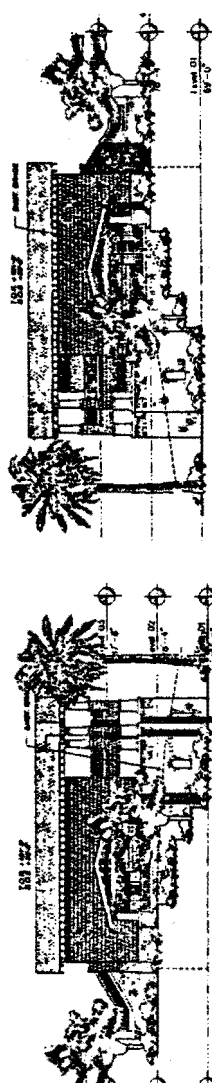
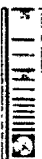
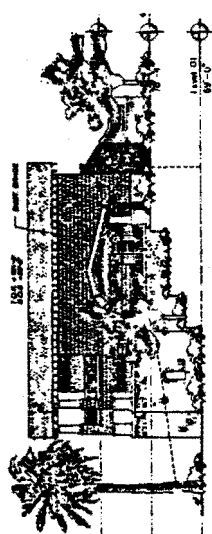


Figure 7
TYPICAL BUNGALOW
SCALE: 1/8" = 1'-0"

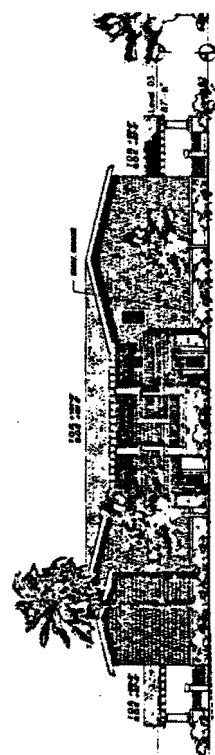
COASTAL DEVELOPMENT PERMIT



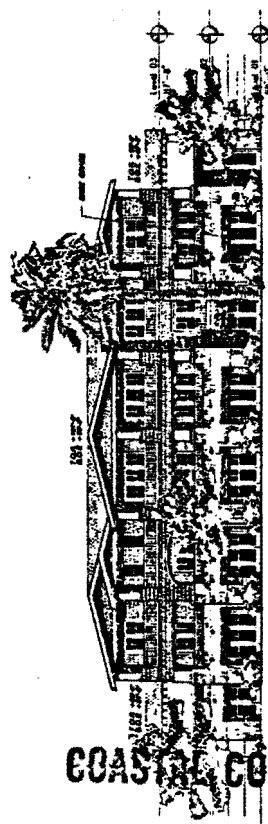
ELEVATION 3



ELEVATION 4



ELEVATION 2



ELEVATION 1

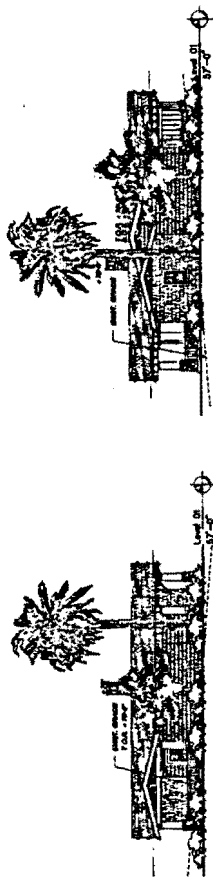
COASTAL COMMISSION

EXHIBIT # 3
PAGE 2 OF 21

HILL GLAZIER ARCHITECTS, INC.
Palo Alto, California

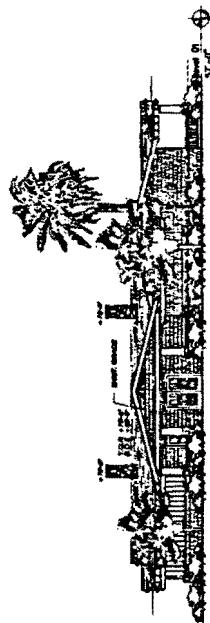
Treasure Island
LAGUNA BEACH, CALIFORNIA

The Athens Group

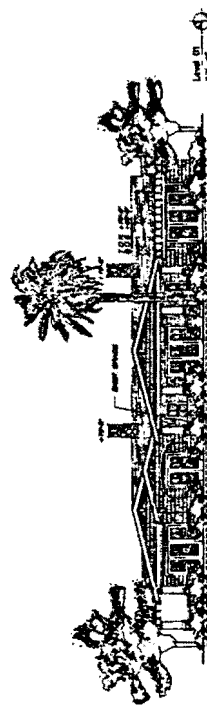


ELEVATION 3

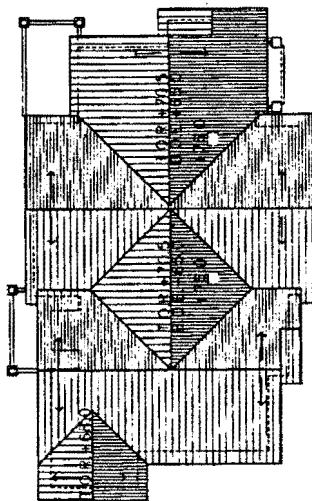
ELEVATION 4



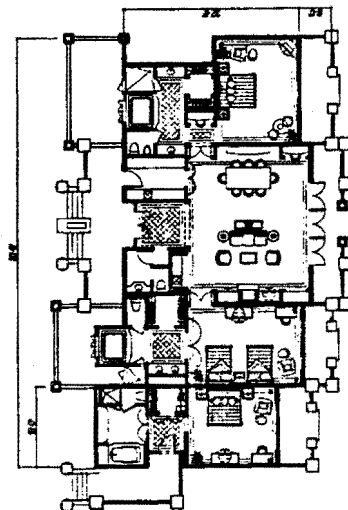
ELEVATION 2



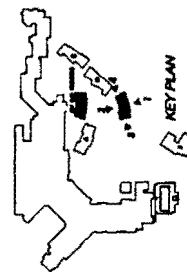
ELEVATION 1



ROOF PLAN



FLOOR PLAN



KEY PLAN

COASTAL COMMISSION

EXHIBIT # 3
PAGE 3 OF 21

HILL GLAZIER ARCHITECTS, INC.
Palo Alto, California

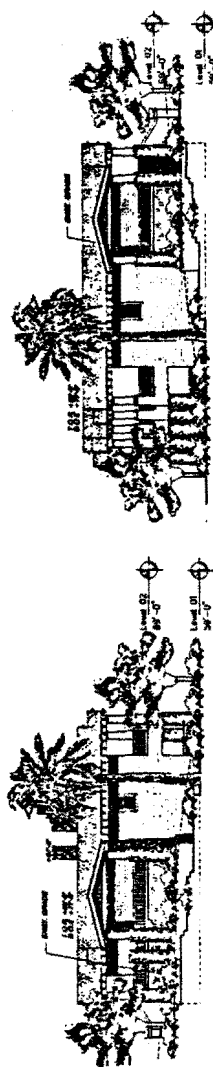
Treasure Island
LAGUNA BEACH, CALIFORNIA

The Athens Group

Figure 8
PRESIDENTIAL BUNGALOW TYPE 1
SCALE: 1/8" = 1'-0"

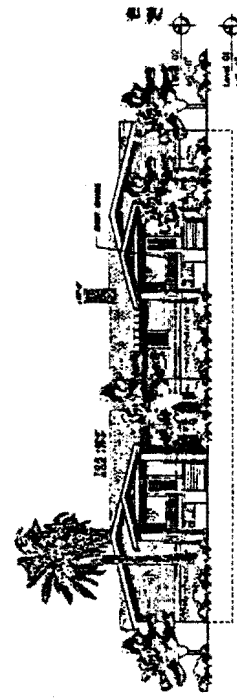
COASTAL DEVELOPMENT PERMIT

DATE: 11-1-68



ELEVATION 3

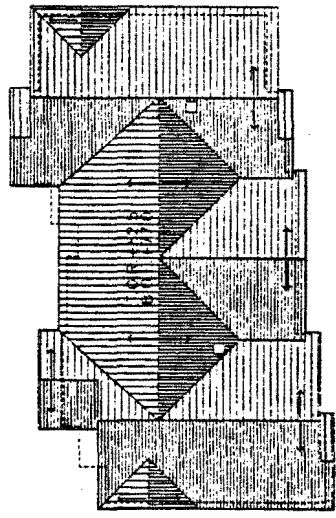
ELEVATION 4



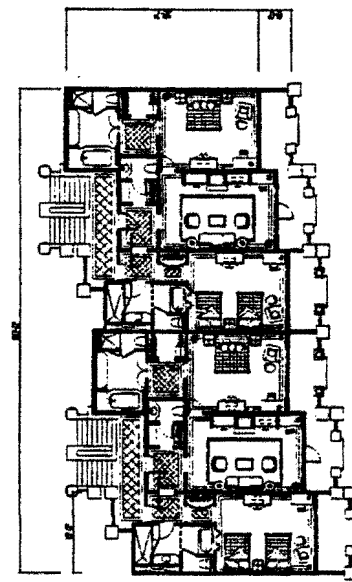
ELEVATION 2



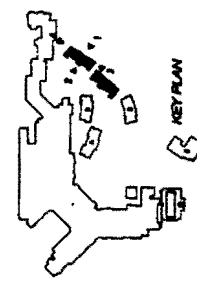
ELEVATION 1



ROOF PLAN



FLOOR PLAN



KEY PLAN

Figure 9
EXECUTIVE BUNGALOW
SCALE: 1/8" = 1'-0"

COASTAL DEVELOPMENT PERMIT



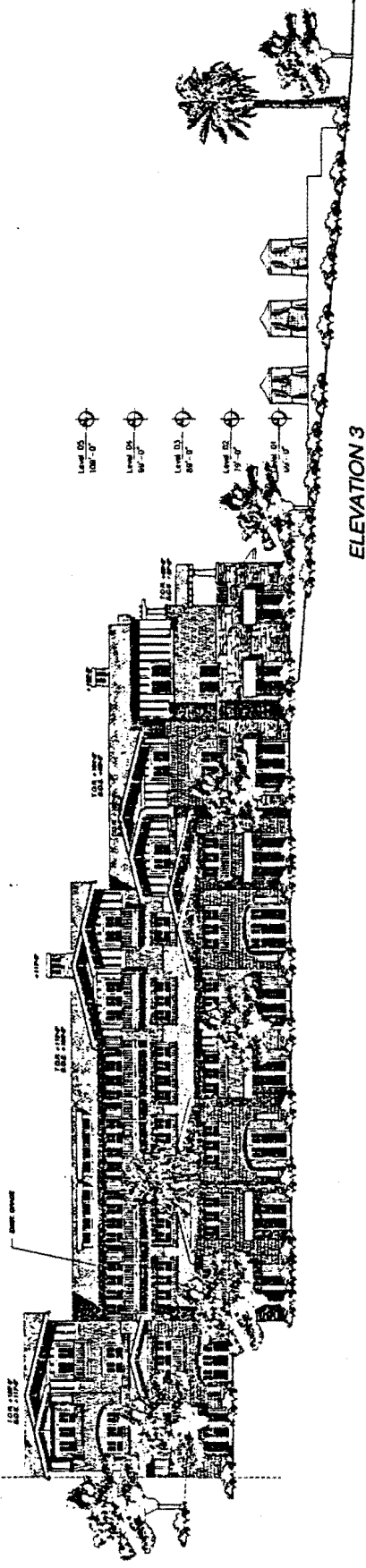
COASTAL COMMISSION

EXHIBIT # 3
PAGE 4 OF 21

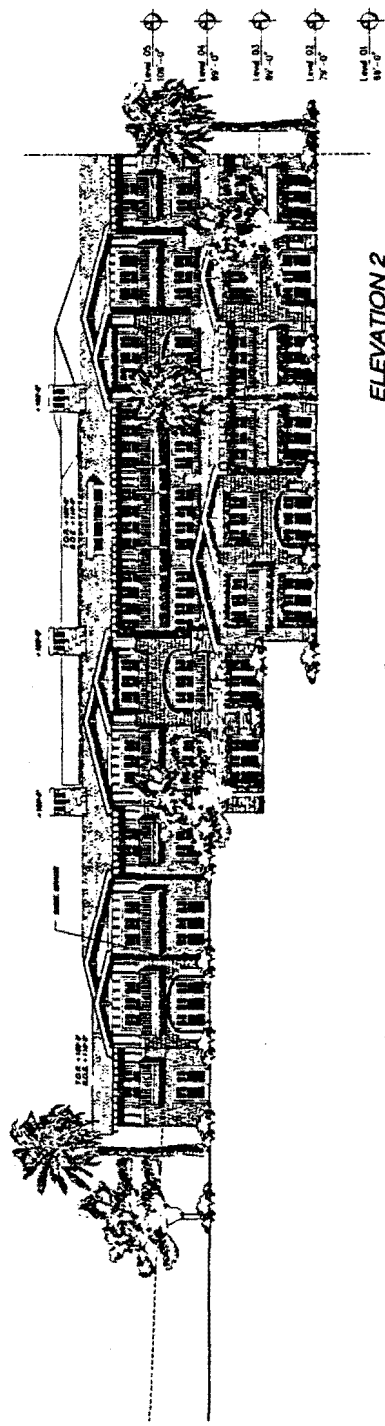
HILL GLAZIER ARCHITECTS, INC.
Palo Alto, California

Treasure Island
LAGUNA BEACH, CALIFORNIA

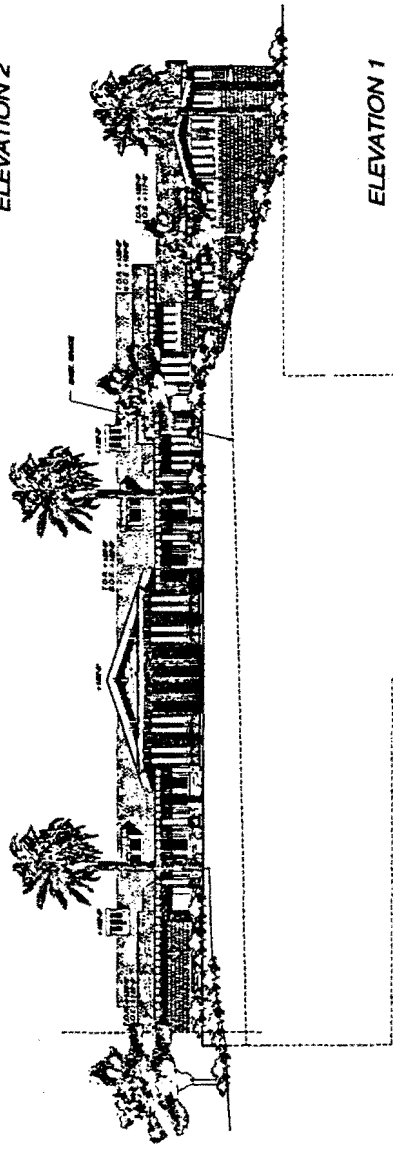
The Athens Group



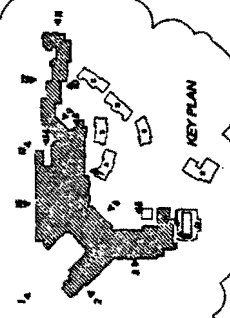
ELEVATION 3



ELEVATION 2



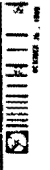
ELEVATION 1



KEY PLAN

Figure 10
MAIN HOTEL ELEVATIONS
SCALE: 1/8" = 1'-0"

COASTAL DEVELOPMENT PERMIT



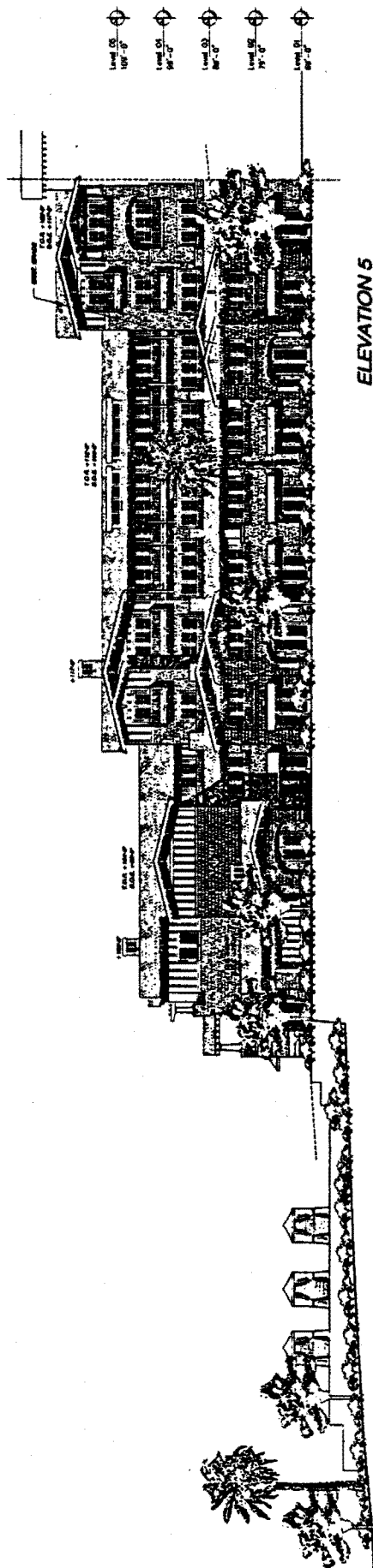
COASTAL COMMISSION

EXHIBIT # 3
PAGE 5 OF 21

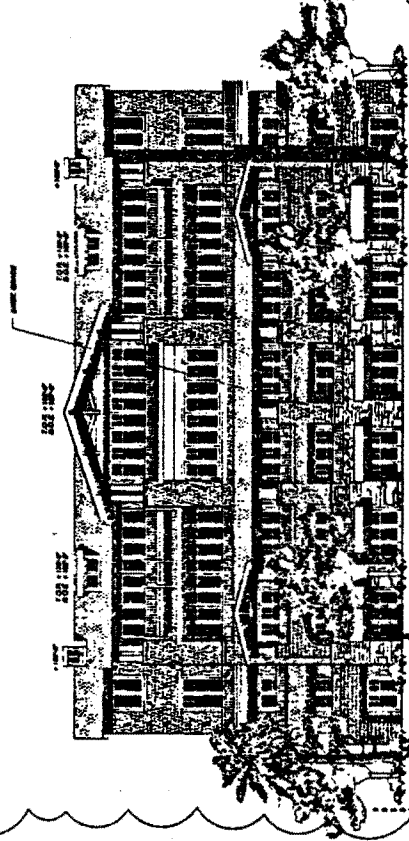
HILL GLAZIER ARCHITECTS, INC.
Palo Alto, California

Treasure Island
LAGUNA BEACH, CALIFORNIA

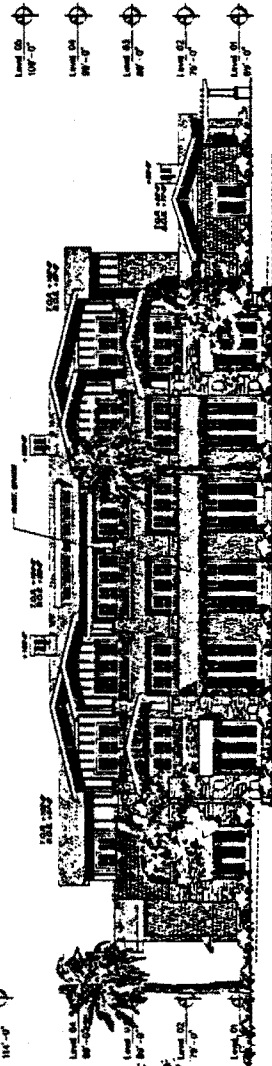
The Athens Group



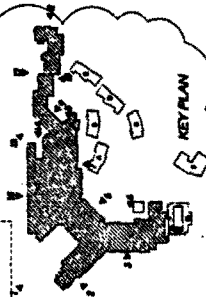
ELEVATION 5



ELEVATION 6



ELEVATION 4



KEY PLAN

COMMISSION

3
6 OF 21

HILL GLAZIER ARCHITECTS, INC.
Palo Alto, California

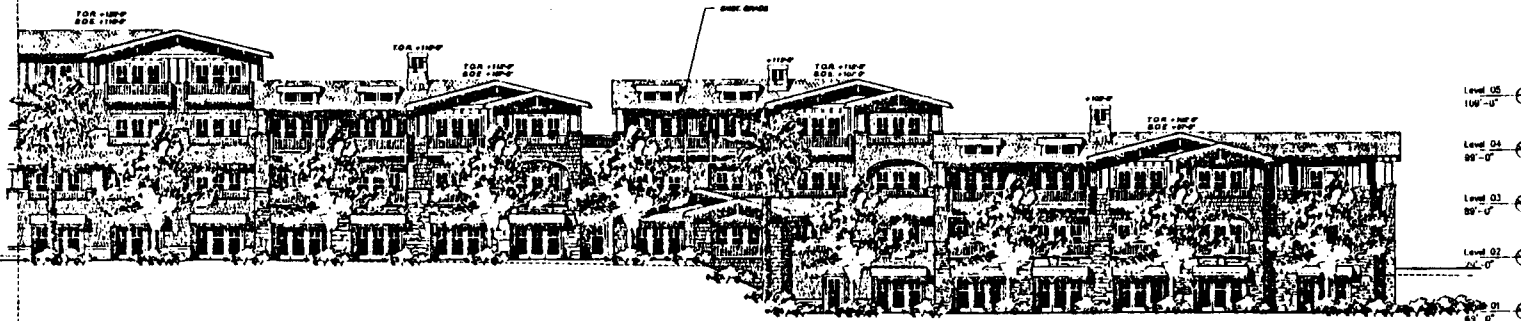
Treasure Island
LAGUNA BEACH, CALIFORNIA

The Athens Group

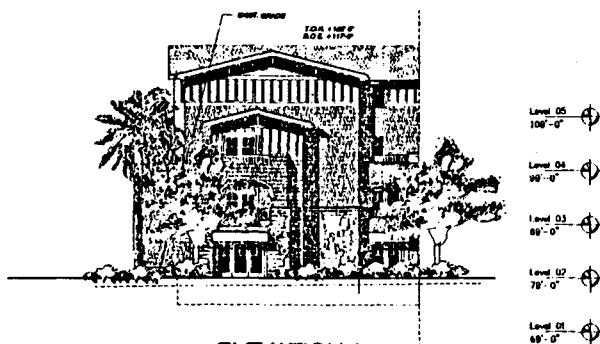
Figure 11
MAIN HOTEL ELEVATIONS
SCALE: 1/8" = 1'-0"

COASTAL DEVELOPMENT PERMIT

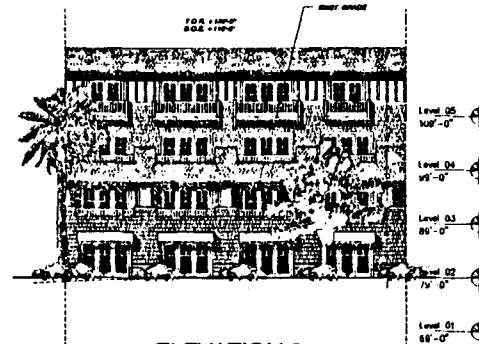
NOV 11 1964



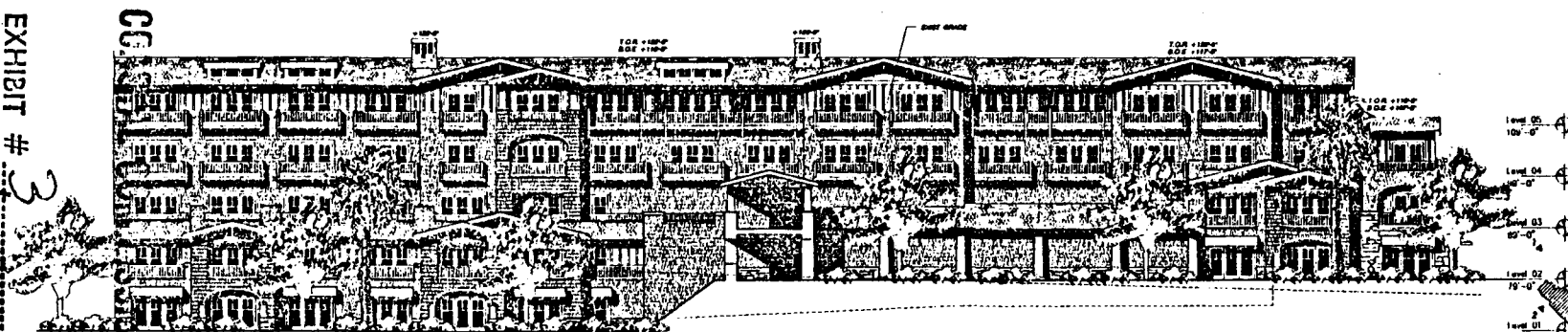
ELEVATION 10



ELEVATION 8



ELEVATION 9



ELEVATION 7

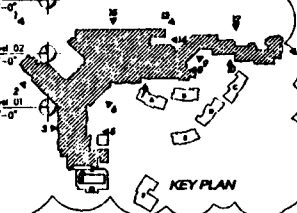


Figure 12
MAIN HOTEL ELEVATIONS
SCALE: 1/8" = 1'-0"
COASTAL DEVELOPMENT PERMIT

HILL GLAZIER ARCHITECTS, INC.
Palo Alto, California

Treasure Island
LAGUNA BEACH, CALIFORNIA
The Athens Group

EXHIBIT # 3
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ELEVATION 15

ELEVATION 12

ELEVATION 11

ELEVATION 13

COASTAL COMMISSION

EXHIBIT # 3
PAGE 8 OF 21

HILL GLAZIER ARCHITECTS, INC.
Palo Alto, California

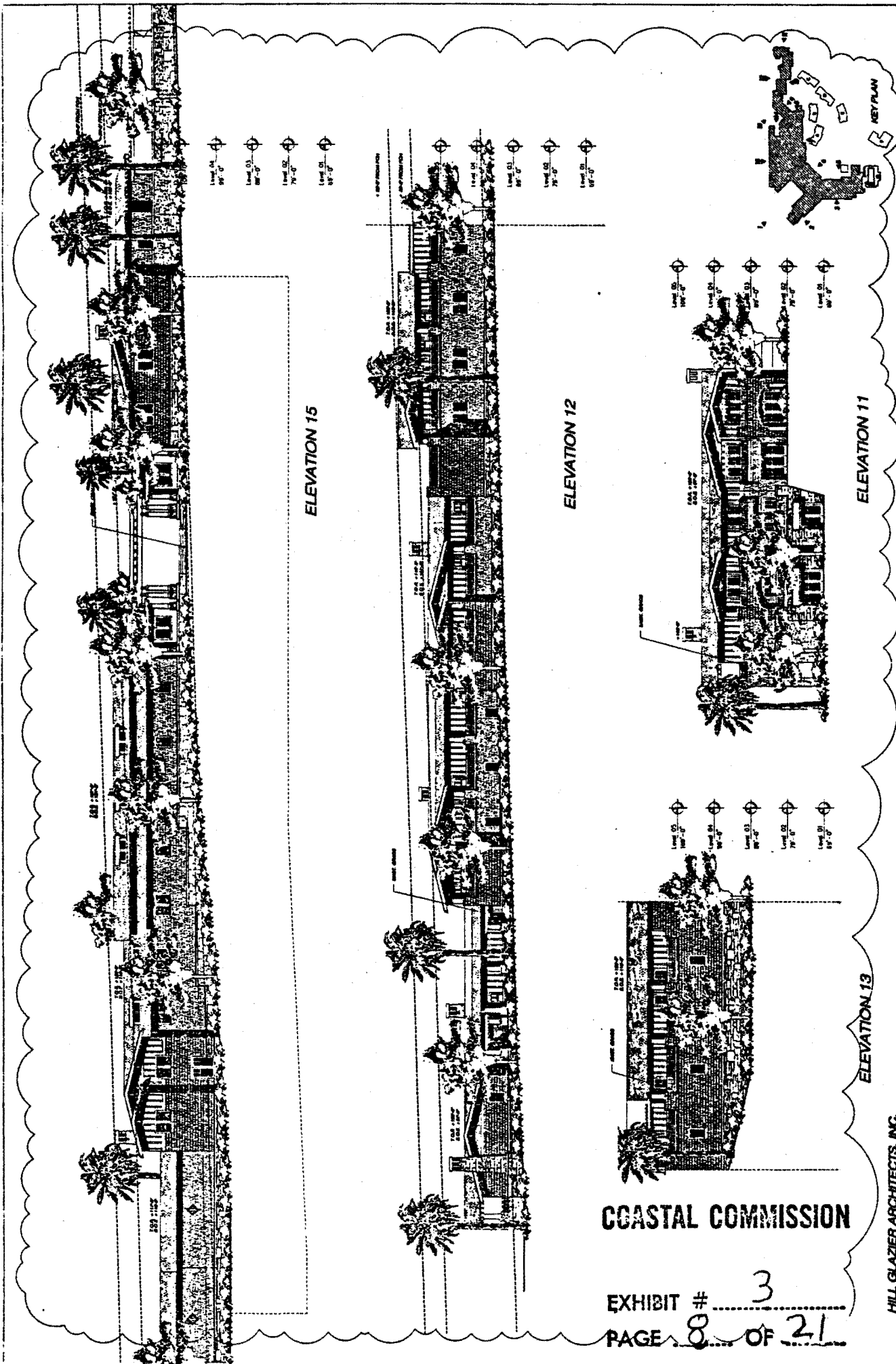
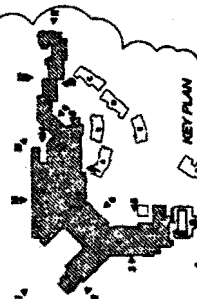
Treasure Island
LAGUNA BEACH, CALIFORNIA

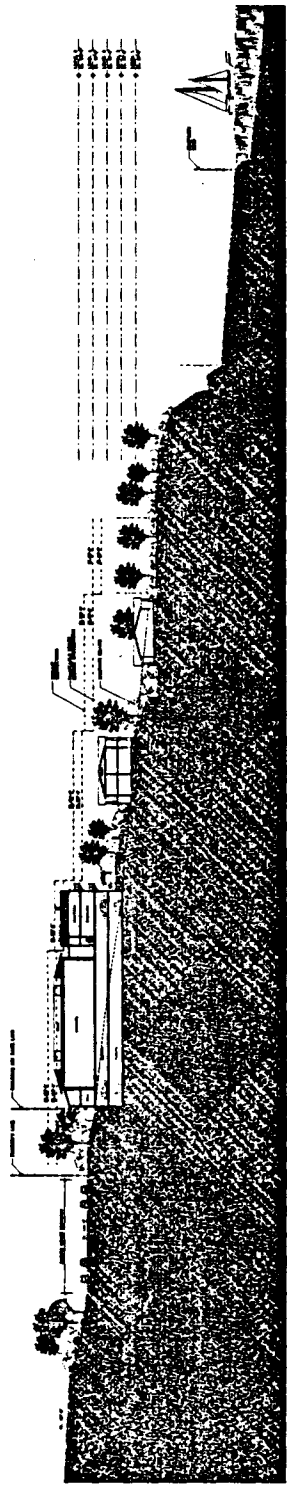
The Athens Group

Figure 13
MAIN HOTEL ELEVATIONS
SCALE: 1/8" = 1'-0"

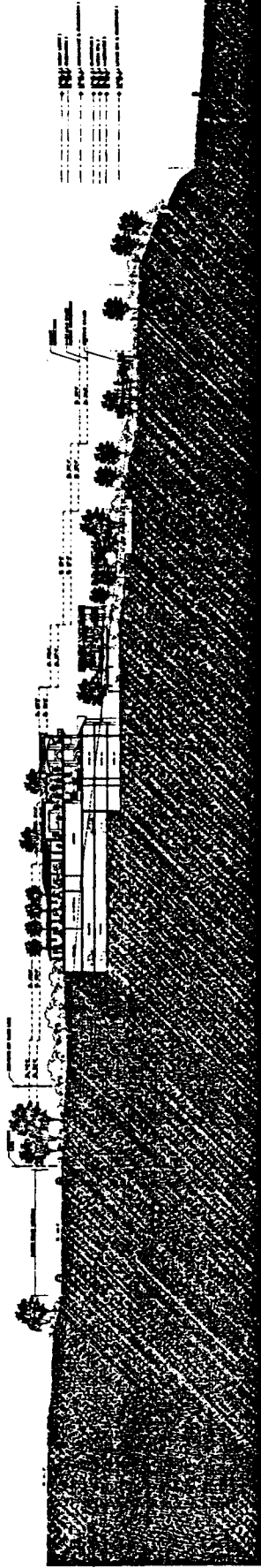
COASTAL DEVELOPMENT PERMIT

DATE: 2. 1962





SECTION B - B



SECTION A - A

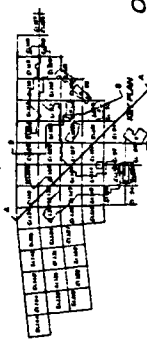
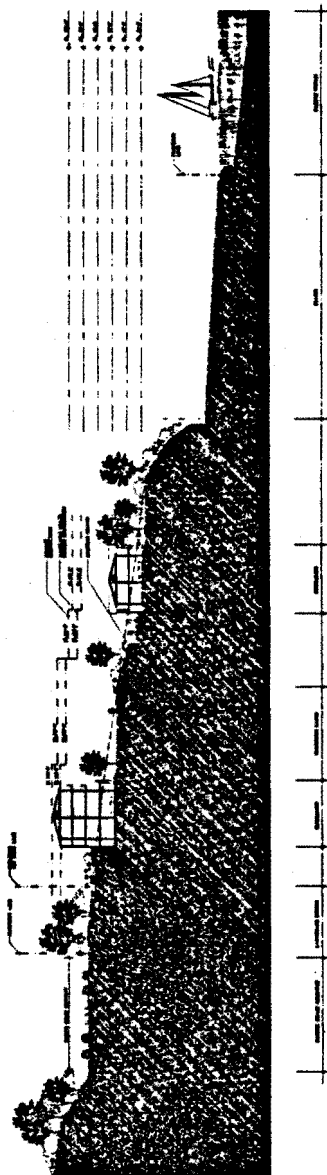
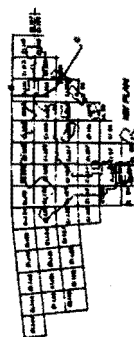


Figure 14
OVERALL SITE SECTIONS
SCALE: 1" = 20'

Figure 15
OVERALL SITE SECTION

WALL SITE SECTION
SCALE: 1" = 30'



COASTAL COMMISSION

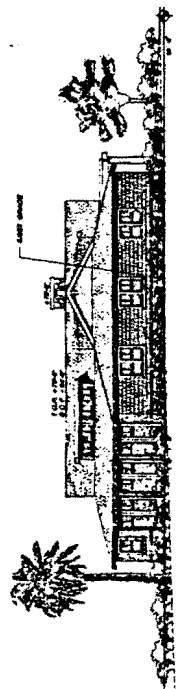
EXHIBIT

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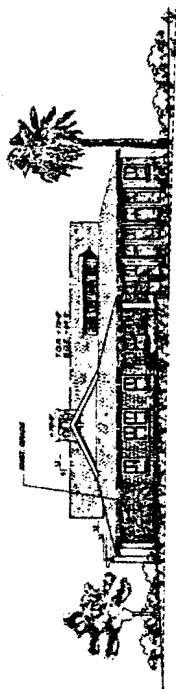
Treasure Island
WOLFEBOATH, MARYLAND

3

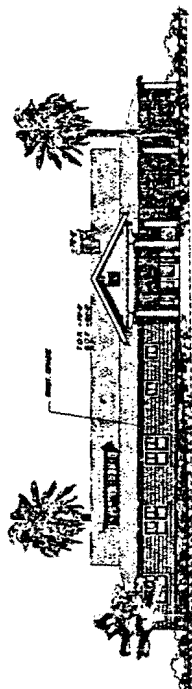
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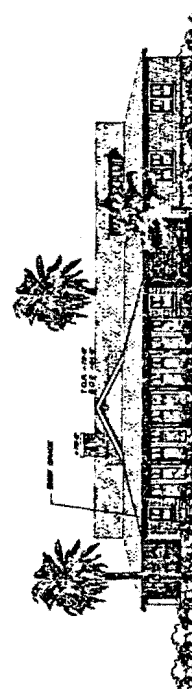
ELEVATION 4



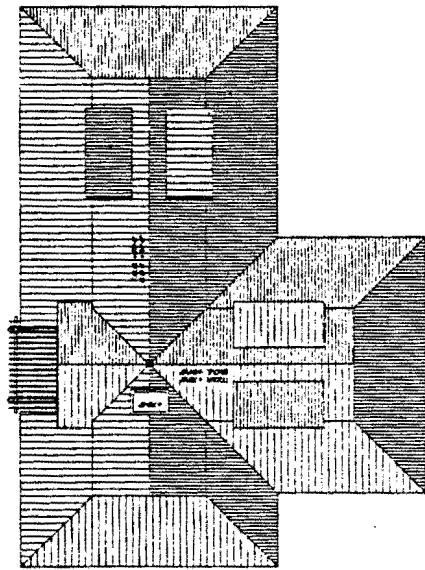
ELEVATION 3



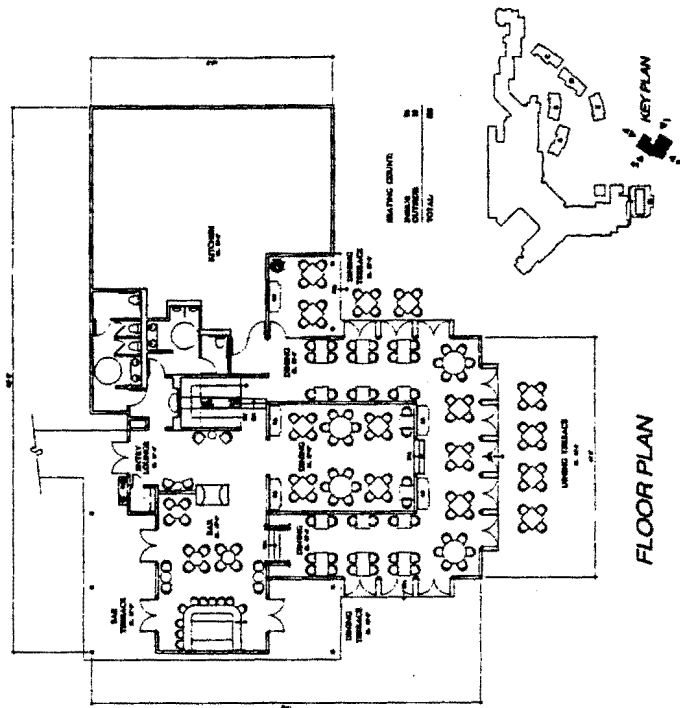
ELEVATION 2



ELEVATION 1



ROOF PLAN



FLOOR PLAN

Figure 16
SPECIALTY RESTAURANT
SCALE: 1/8" = 1'-0"

COASTAL DEVELOPMENT PERMIT

COMET 3, 1988

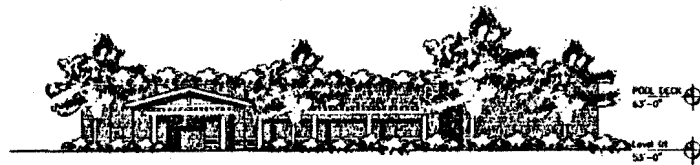
COASTAL COMMISSION

EXHIBIT # 3
PAGE 11 OF 21

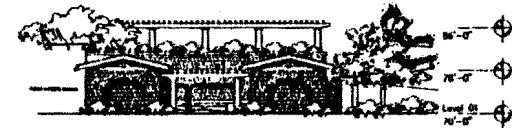
HILL GLAZIER ARCHITECTS, INC.
Palo Alto, California

Treasure Island
LAGUNA BEACH, CALIFORNIA

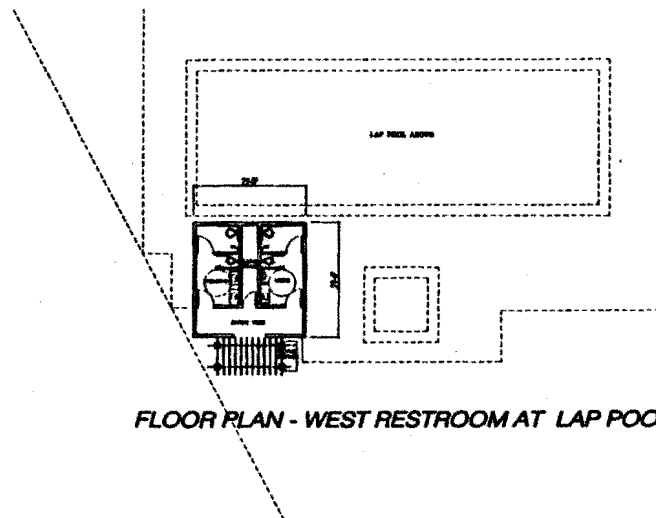
The Athens Group



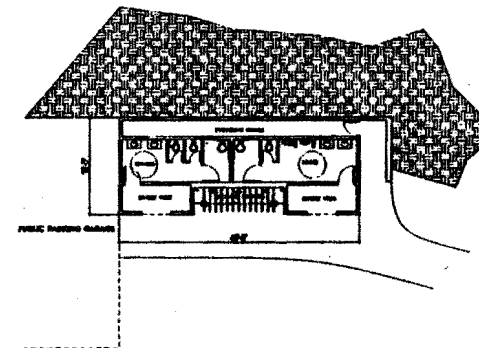
ENTRY ELEVATION - WEST RESTROOM



ENTRY ELEVATION - EAST RESTROOM



FLOOR PLAN - WEST RESTROOM AT LAP POOL



FLOOR PLAN - EAST RESTROOM AT
PUBLIC PARKING GARAGE

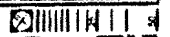
COASTAL COMMISSION
EXHIBIT # 3
PAGE 12 OF 21

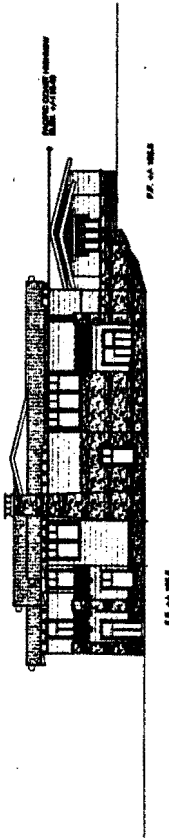
HILL GLAZIER ARCHITECTS, INC.
Palo Alto, California

Treasure Island
LAGUNA BEACH, CALIFORNIA

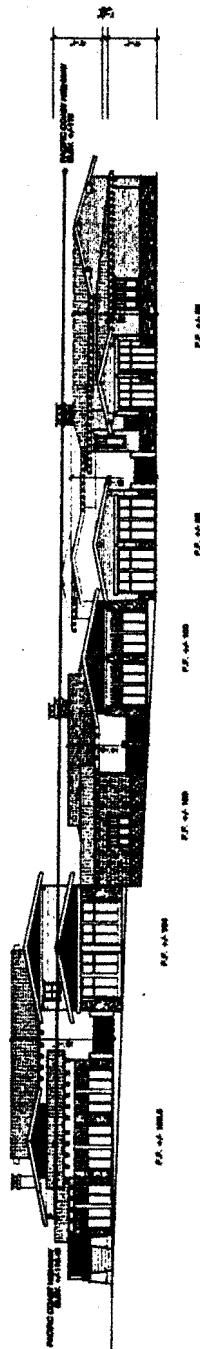
The Athens Group

Figure 17
PUBLIC RESTROOM
SCALE: 1/8" = 1'-0"
COASTAL DEVELOPMENT PERMIT

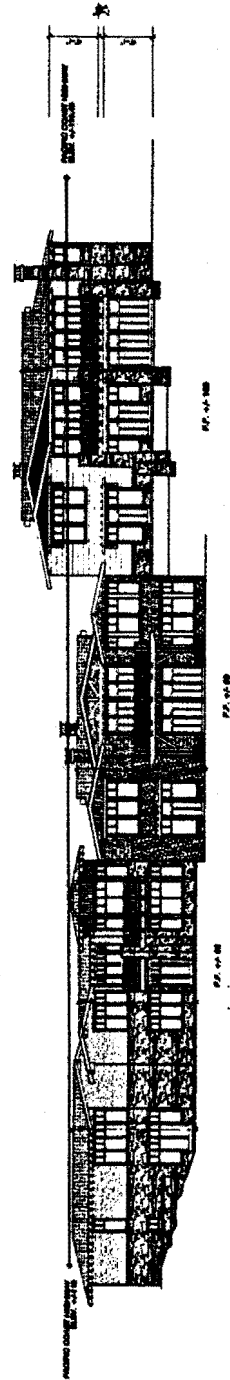




EAST ELEVATION



NORTH ELEVATION



SOUTH ELEVATION

COASTAL COMMISSION

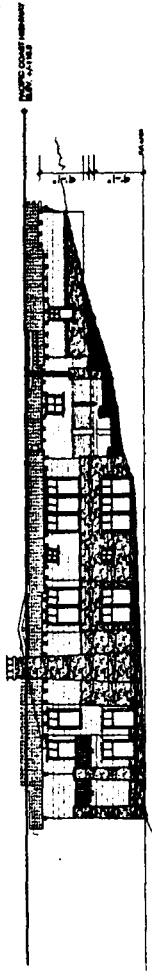
EXHIBIT # 3
PAGE 14 OF 21

McLARN, VASQUEZ & PARTNERS
IRVINE, CALIFORNIA

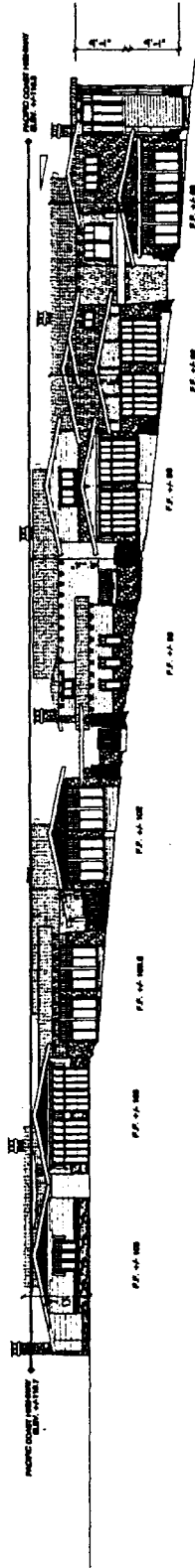
Treasure Island
LAGUNA BEACH, CALIFORNIA
The Athens Group

ELEVATIONS
BUILDING ONE
COASTAL DEVELOPMENT PERMIT

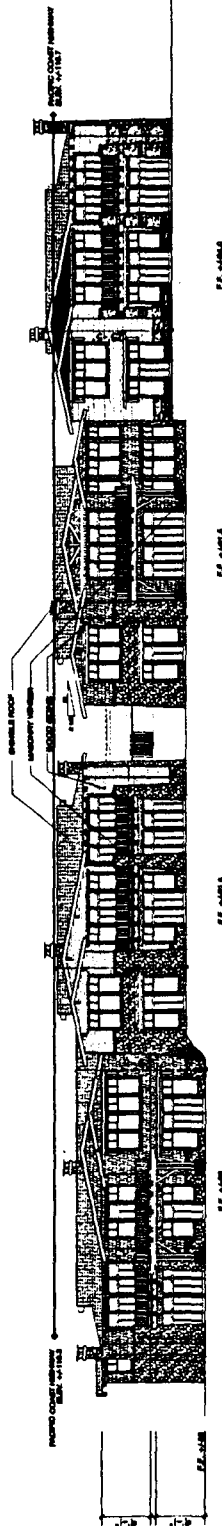




EAST ELEVATION



NORTH ELEVATION



SOUTH ELEVATION

COASTAL COMMISSION

EXHIBIT # 3
PAGE 15 OF 21

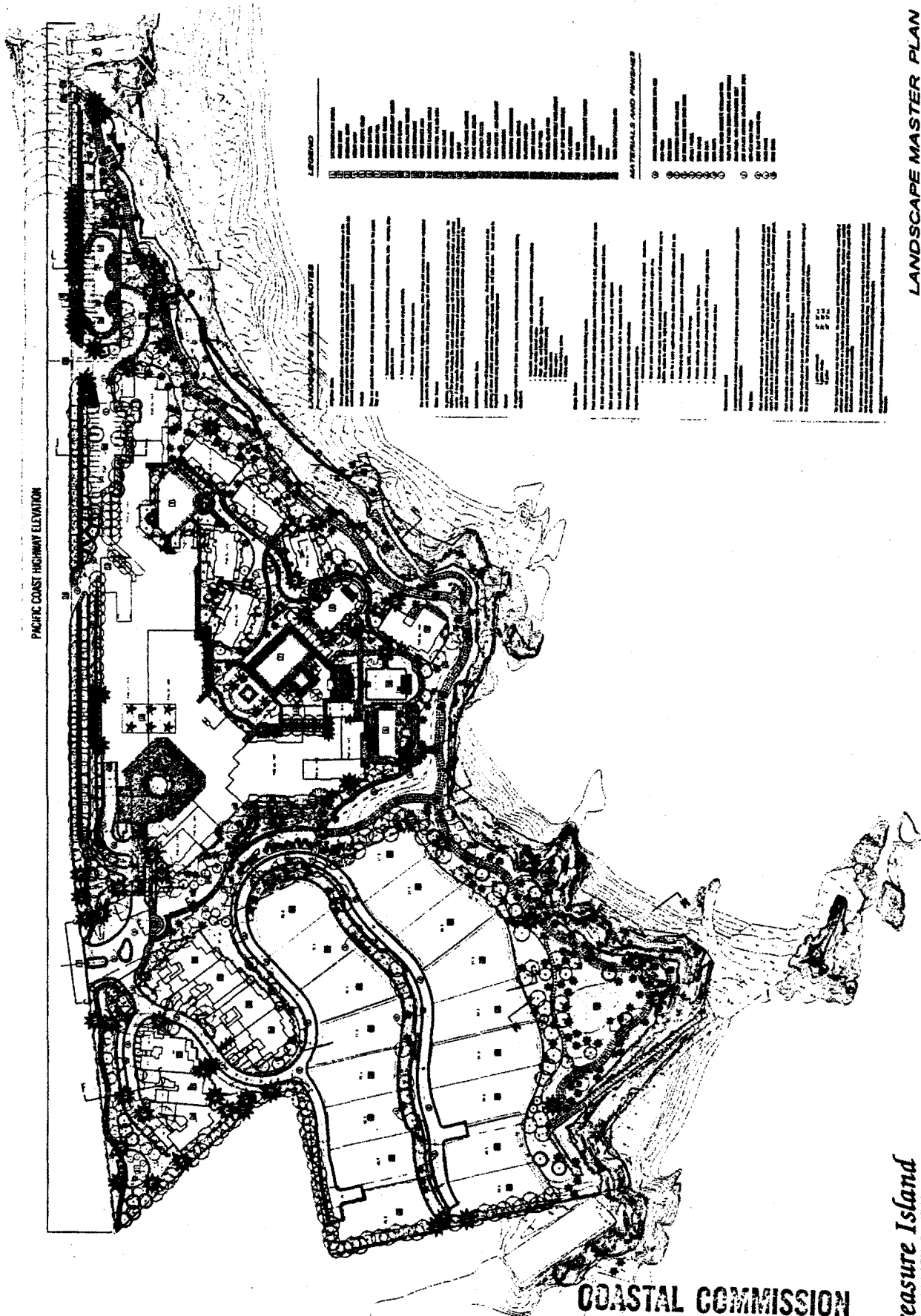
McLARAND, VASQUEZ & PARTNERS
IRVINE, CALIFORNIA

Treasure Island
LAGUNA BEACH, CALIFORNIA

The Athens Group

ELEVATIONS
BUILDING TWO
COASTAL DEVELOPMENT PERMIT





LEGEND

1. 10' WIDE ASPHALT DRIVEWAY	11. 10' WIDE ASPHALT DRIVEWAY
2. 10' WIDE ASPHALT DRIVEWAY	12. 10' WIDE ASPHALT DRIVEWAY
3. 10' WIDE ASPHALT DRIVEWAY	13. 10' WIDE ASPHALT DRIVEWAY
4. 10' WIDE ASPHALT DRIVEWAY	14. 10' WIDE ASPHALT DRIVEWAY
5. 10' WIDE ASPHALT DRIVEWAY	15. 10' WIDE ASPHALT DRIVEWAY
6. 10' WIDE ASPHALT DRIVEWAY	16. 10' WIDE ASPHALT DRIVEWAY
7. 10' WIDE ASPHALT DRIVEWAY	17. 10' WIDE ASPHALT DRIVEWAY
8. 10' WIDE ASPHALT DRIVEWAY	18. 10' WIDE ASPHALT DRIVEWAY
9. 10' WIDE ASPHALT DRIVEWAY	19. 10' WIDE ASPHALT DRIVEWAY
10. 10' WIDE ASPHALT DRIVEWAY	20. 10' WIDE ASPHALT DRIVEWAY
21. 10' WIDE ASPHALT DRIVEWAY	31. 10' WIDE ASPHALT DRIVEWAY
32. 10' WIDE ASPHALT DRIVEWAY	41. 10' WIDE ASPHALT DRIVEWAY
42. 10' WIDE ASPHALT DRIVEWAY	51. 10' WIDE ASPHALT DRIVEWAY
52. 10' WIDE ASPHALT DRIVEWAY	61. 10' WIDE ASPHALT DRIVEWAY
62. 10' WIDE ASPHALT DRIVEWAY	71. 10' WIDE ASPHALT DRIVEWAY
72. 10' WIDE ASPHALT DRIVEWAY	81. 10' WIDE ASPHALT DRIVEWAY
82. 10' WIDE ASPHALT DRIVEWAY	91. 10' WIDE ASPHALT DRIVEWAY
92. 10' WIDE ASPHALT DRIVEWAY	101. 10' WIDE ASPHALT DRIVEWAY

LANDSCAPE ZONING NOTES

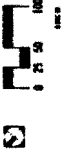
1. 10' WIDE ASPHALT DRIVEWAY	11. 10' WIDE ASPHALT DRIVEWAY
2. 10' WIDE ASPHALT DRIVEWAY	12. 10' WIDE ASPHALT DRIVEWAY
3. 10' WIDE ASPHALT DRIVEWAY	13. 10' WIDE ASPHALT DRIVEWAY
4. 10' WIDE ASPHALT DRIVEWAY	14. 10' WIDE ASPHALT DRIVEWAY
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6. 10' WIDE ASPHALT DRIVEWAY	16. 10' WIDE ASPHALT DRIVEWAY
7. 10' WIDE ASPHALT DRIVEWAY	17. 10' WIDE ASPHALT DRIVEWAY
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9. 10' WIDE ASPHALT DRIVEWAY	19. 10' WIDE ASPHALT DRIVEWAY
10. 10' WIDE ASPHALT DRIVEWAY	20. 10' WIDE ASPHALT DRIVEWAY
21. 10' WIDE ASPHALT DRIVEWAY	31. 10' WIDE ASPHALT DRIVEWAY
32. 10' WIDE ASPHALT DRIVEWAY	41. 10' WIDE ASPHALT DRIVEWAY
42. 10' WIDE ASPHALT DRIVEWAY	51. 10' WIDE ASPHALT DRIVEWAY
52. 10' WIDE ASPHALT DRIVEWAY	61. 10' WIDE ASPHALT DRIVEWAY
62. 10' WIDE ASPHALT DRIVEWAY	71. 10' WIDE ASPHALT DRIVEWAY
72. 10' WIDE ASPHALT DRIVEWAY	81. 10' WIDE ASPHALT DRIVEWAY
82. 10' WIDE ASPHALT DRIVEWAY	91. 10' WIDE ASPHALT DRIVEWAY
92. 10' WIDE ASPHALT DRIVEWAY	101. 10' WIDE ASPHALT DRIVEWAY

MATERIALS AND FINISHES

1. 10' WIDE ASPHALT DRIVEWAY	11. 10' WIDE ASPHALT DRIVEWAY
2. 10' WIDE ASPHALT DRIVEWAY	12. 10' WIDE ASPHALT DRIVEWAY
3. 10' WIDE ASPHALT DRIVEWAY	13. 10' WIDE ASPHALT DRIVEWAY
4. 10' WIDE ASPHALT DRIVEWAY	14. 10' WIDE ASPHALT DRIVEWAY
5. 10' WIDE ASPHALT DRIVEWAY	15. 10' WIDE ASPHALT DRIVEWAY
6. 10' WIDE ASPHALT DRIVEWAY	16. 10' WIDE ASPHALT DRIVEWAY
7. 10' WIDE ASPHALT DRIVEWAY	17. 10' WIDE ASPHALT DRIVEWAY
8. 10' WIDE ASPHALT DRIVEWAY	18. 10' WIDE ASPHALT DRIVEWAY
9. 10' WIDE ASPHALT DRIVEWAY	19. 10' WIDE ASPHALT DRIVEWAY
10. 10' WIDE ASPHALT DRIVEWAY	20. 10' WIDE ASPHALT DRIVEWAY
21. 10' WIDE ASPHALT DRIVEWAY	31. 10' WIDE ASPHALT DRIVEWAY
32. 10' WIDE ASPHALT DRIVEWAY	41. 10' WIDE ASPHALT DRIVEWAY
42. 10' WIDE ASPHALT DRIVEWAY	51. 10' WIDE ASPHALT DRIVEWAY
52. 10' WIDE ASPHALT DRIVEWAY	61. 10' WIDE ASPHALT DRIVEWAY
62. 10' WIDE ASPHALT DRIVEWAY	71. 10' WIDE ASPHALT DRIVEWAY
72. 10' WIDE ASPHALT DRIVEWAY	81. 10' WIDE ASPHALT DRIVEWAY
82. 10' WIDE ASPHALT DRIVEWAY	91. 10' WIDE ASPHALT DRIVEWAY
92. 10' WIDE ASPHALT DRIVEWAY	101. 10' WIDE ASPHALT DRIVEWAY

LANDSCAPE MASTER PLAN

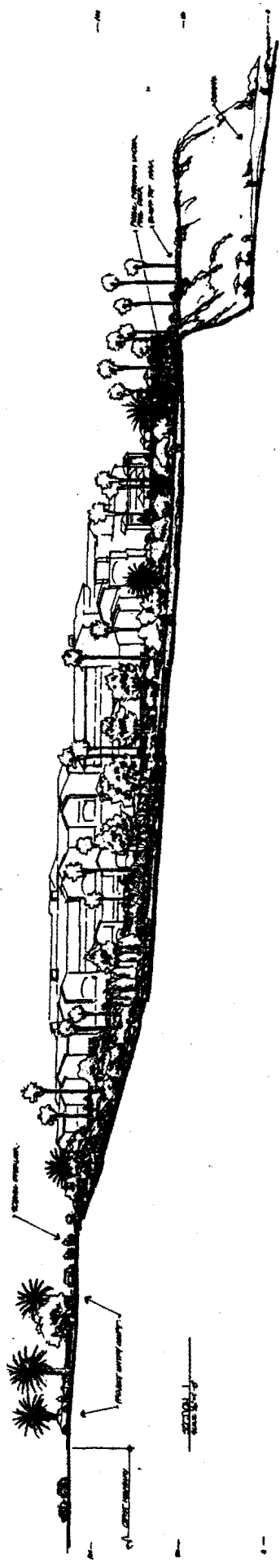
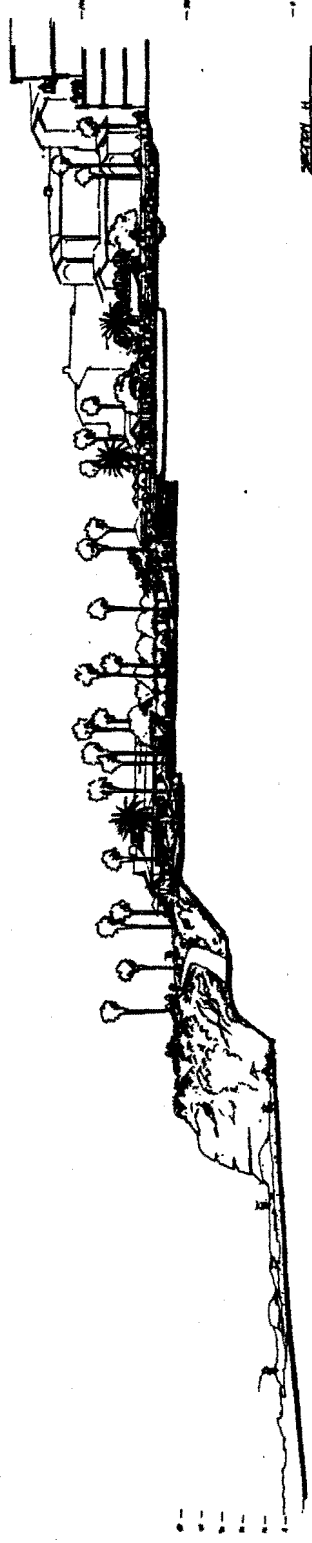
COASTAL DEVELOPMENT PERMIT
 HORTON ASSOCIATES LANDSCAPE ARCHITECTURE AND PLANNING



COASTAL COMMISSION

Treasure Island
 LAGUNA BEACH, CALIFORNIA

The Atkins Group



LANDSCAPE ELEVATIONS AND SECTIONS
 COASTAL DRIVE DEVELOPMENT PROJECT
 10000 SOUTHWEST CORNER OF 100TH AND 101ST STS.
 NORTH BAYVIEW, LOS ANGELES, CALIFORNIA

Treasure Island
 10000 SOUTHWEST CORNER OF 100TH AND 101ST STS.
 NORTH BAYVIEW, LOS ANGELES, CALIFORNIA

COASTAL COMMISSION

EXHIBIT # 3
 PAGE 18 OF 21

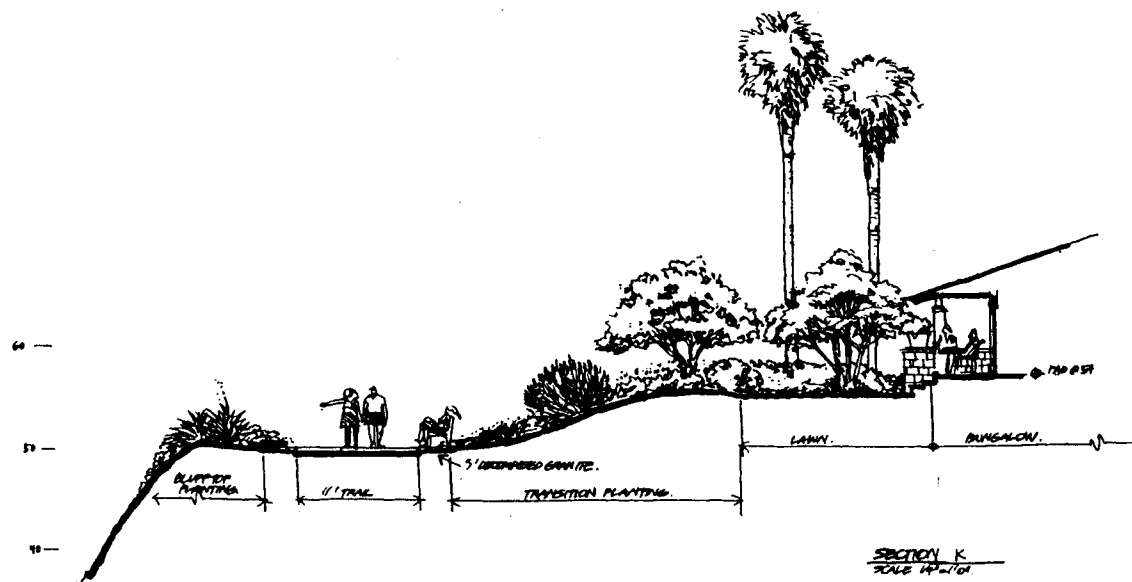
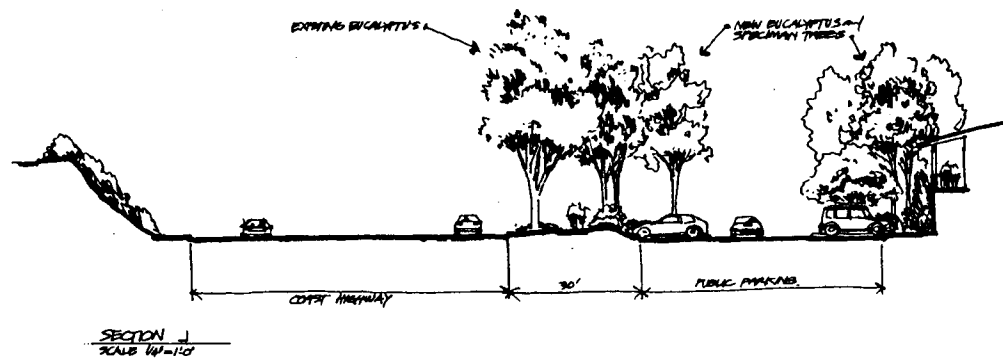


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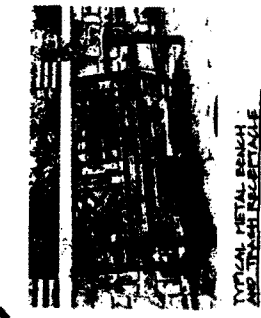
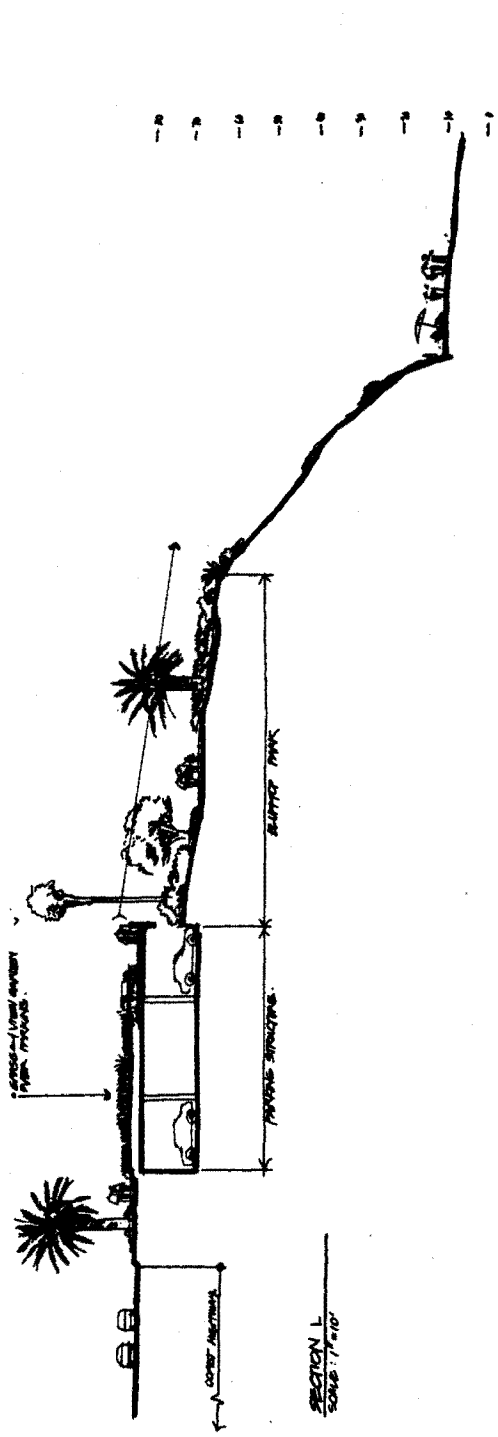
COASTAL DEVELOPMENT

Treasure Island
LAGUNA BEACH, CALIFORNIA

The Athens Group

LANDSCAPE ELEVATIONS AND SECTIONS
COASTAL DEVELOPMENT PERMIT

BURTON ASSOCIATES LANDSCAPE ARCHITECTURE AND PLANNING

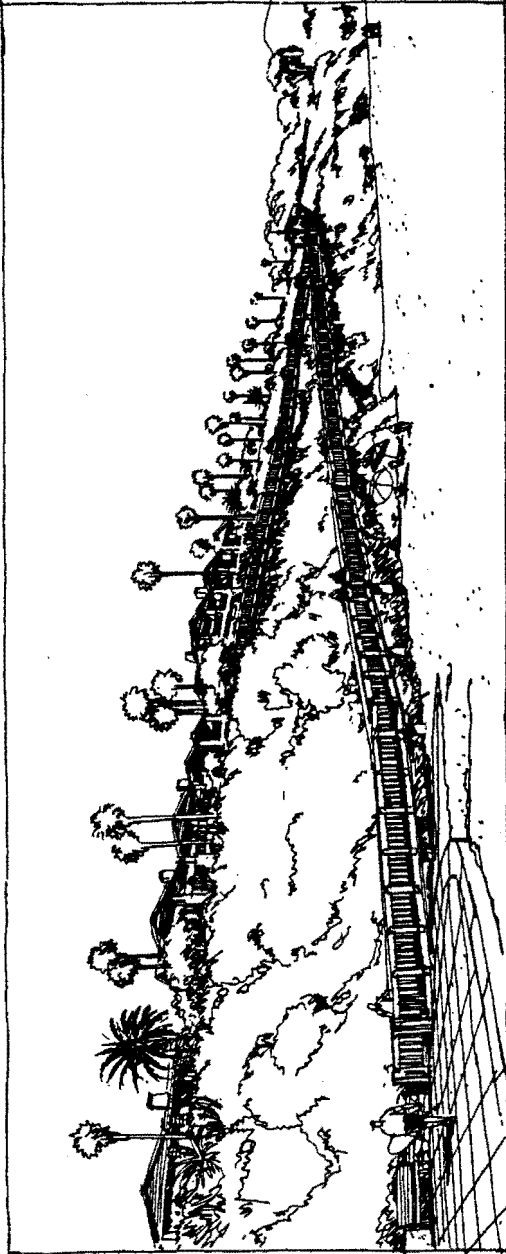


TYPICAL METAL BENCH AND TRASH RECEPTACLE

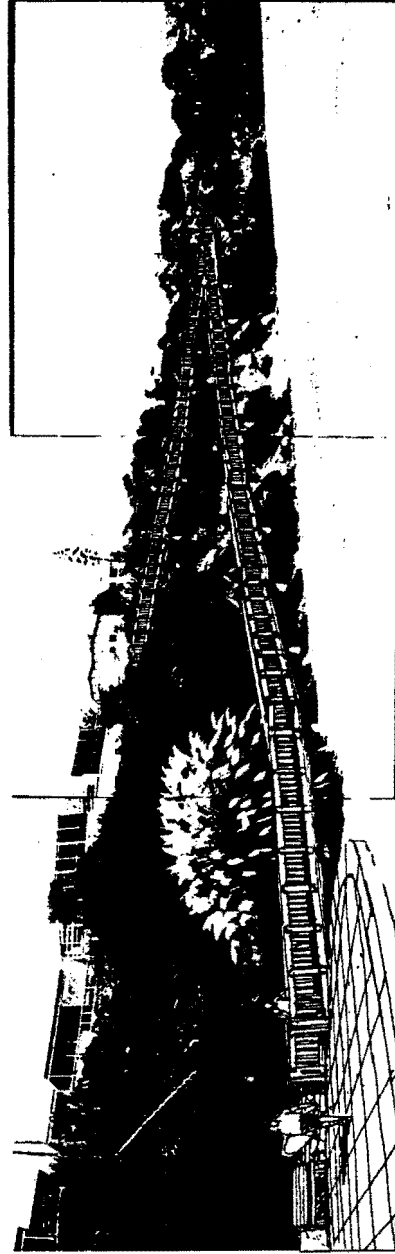
COASTAL COMMISSION

Treasure Island
LAGUNA BEACH, CALIFORNIA
The Athens Group

LANDSCAPE ELEVATIONS AND SECTIONS
COASTAL DEVELOPMENT PERMIT
METRA ASSOCIATES LANDSCAPE ARCHITECTURE AND PLANNING



BEACH ACCESS RAMP
LANDSCAPE DEVELOPMENT PERMIT



BEACH ACCESS RAMP
LANDSCAPE DEVELOPMENT PERMIT

COASTAL COMMISSION

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Treasure Island
LAGUNA BEACH, CALIFORNIA
The Athens Group

LANDSCAPE ELEVATIONS AND SECTIONS
COASTAL DEVELOPMENT PERMIT
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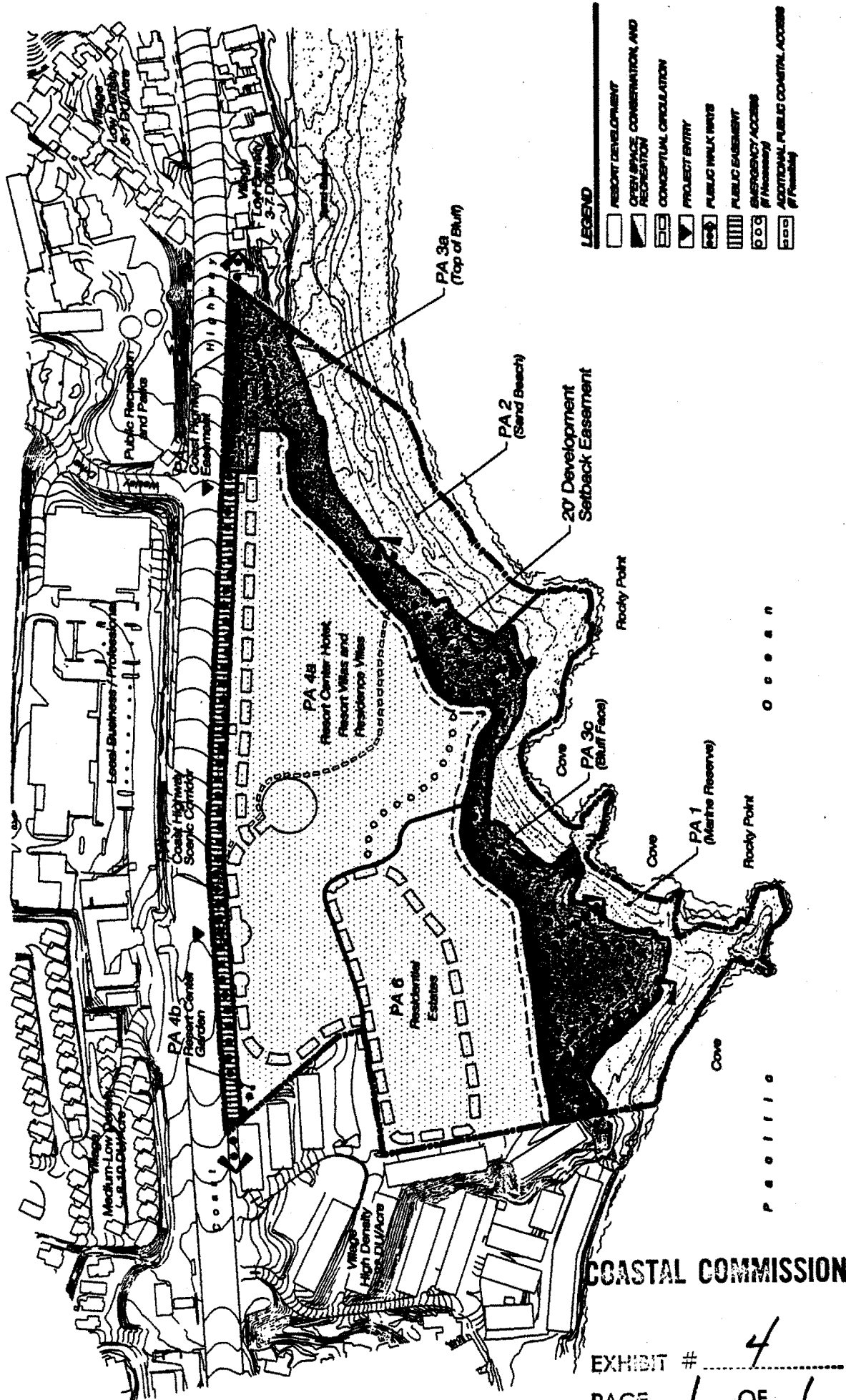


Figure ES-4
SPECIFIC PLAN MAP
for the Treasure Island Specific Plan Area

Treasure Island
LAGUNA BEACH, CALIFORNIA

Local Coastal Program

FORM 1000-100

- 1) Comply with all approved plans, specifications and programs submitted with the application for the proposed subdivision and MU & BI, including the site plan, as outlined on those plans, specifications or programs.
- 2) Comply with all Project Design Features, Standard Conditions and Mitigation Measures as identified in the certified FEIR and as outlined in the Mitigation Monitoring Program. Pay for the cost of all engineers, geologists, archaeologists, paleontologists or other similar authorities or specialists that are required by the Mitigation Monitoring Program to provide services during the development of the site.
- 3) Comply with all of the provisions of the Development Agreement, including the public park area maintenance responsibilities. Maintain the public park areas, including public restroom facilities, in perpetuity. Maintain public park areas in accordance with Section 3.1.2 of the Development Agreement or subject Lot 21 (the Resort Center parcel) to a special assessment by the City pursuant to City Municipal Code Section 7.24.090.
- 4) Submit within two years of the effective date of the conditional approval of Tentative Tract Map 15497, or as otherwise provided by an approved expiration period extension, complete and accurate Final Map or Maps based upon field survey. Tie the boundary of the Final Map into the Horizontal Control System established by the County Surveyor as described in Sections 7-9-330 and 7-9-337 of the Orange County Subdivision Code and Orange County Subdivision Manual, Subarticle 18, as may be amended, prior to the approval of the Final Map.
- 5) Provide easements and dedications on the Final Map to the City of Laguna Beach and City designees, as determined by the City, (such as, utility agencies or districts and Orange County, including, but not limited to:

COASTAL COMMISSION

- 1 a) A 50-foot Coast Highway right-of-way dedication (measured from street centerline
2 to property line);
3 b) A 25-foot scenic highway setback easement;
4 c) Park and Open Space from the following combination of areas (as depicted on the
5 Tentative Tract Map):
6

7 (Note: See Condition No. 33 which will alter the below listed acreage totals and
8 the below listed acreage for Lots C and H.)

9 Park Areas – 7.08 acres

10 Lot 22 – 0.54 acres as park easement,

11 Lot C – 0.35 acres as parkland use easement. (This area is a 20-foot wide
12 easement in front of the Residential Estates in order to accommodate inland
13 relocation of the Blufftop Park should the park decrease in width due to bluff
14 slope failure and shall be fully utilized as a parkland use in the meantime.)
15

16 Lot F – 0.30 acres as park easement (Resort Garden),

17 Lot H – 2.76 acres in fee dedication for park,

18 Lot I (bluff-face part) – 2.83 acres in fee dedication for park, and

19 Lot J – 0.30 acres as park easement

20 Additional Open Space – 0.26 acres

21 Lot K – 0.26 acres as landscaped, open space easement
22

23 Total Park and Landscaped Open Space Areas – 7.34 acres

- 24 d) A 20-foot wide easement area in front of the resort in order to accommodate inland
25 relocation of the Blufftop Park should the park decrease in width due to bluff slope
26 failure (0.44 acres).
27

- 1 e) An easement for vehicular access for law enforcement, emergency and beach
2 maintenance and operation on, over and across Lots 22, H, I and J and all public
3 parking areas.
- 4 6) Provide on the Final Map the approved view corridor easements consistent with LCP
5 Visual and Scenic Resources Policy 3.4.2 #2. Establish on the Final Map permanent
6 landscape easement areas over those portions of Residential Estate Lots 9 and 10 within
7 the 100-foot view corridor so that nothing but approved landscaping and fencing are
8 allowed in those areas. The fences located on Lots 9 and 10 shall be constructed and
9 landscaped so that when the landscaping grows to a mature height the fences are not
10 visible from the view corridor.
- 11 7) Designate the approved setbacks proposed for the Residential Estate Lots on the Final
12 Map, which shall at a minimum comply with the R-1 setback standards. Limit the
13 homes to a single-story and 20 feet above finished pad elevation for 20% of the roof
14 footprint area and 18 feet above finished pad elevation for the remaining 80% of the roof
15 footprint area. Limit and designate on the Final Map a maximum 44% lot coverage for
16 the Residential Estate lots. Prohibit variances regarding proposed Residential Estates
17 structural height limits and setbacks. Indicate this variance prohibition on the Final Map
18 and as a deed restriction.
- 19 8) Provide infrastructure ownership and maintenance responsibilities on the Final Map as
20 follows:
- 21 a) Slope areas in Lots H & I - Maintained by the Resort Center Owner/Operator.

COASTAL COMMISSION

EXHIBIT # 5

PAGE 3 OF 13

1 b) Sewer, storm drain and diversion and sediment removal system(s) serving more than
2 one unit or lot – Dedicated to the Association or Resort Center Owner/Operator for
3 maintenance and operation by an 8-foot easement centered over the sewer, storm
4 drain and diversion lines. Maintain infrastructure to the satisfaction of the City or
5 possibly subject affected parcels to a special assessment by the City pursuant to City
6 Municipal Code Section 7.24.090.
7

8 9) Demonstrate that all public utilities that serve the subdivision have been designed and
9 constructed in accordance with City codes and standards and the requirements of the
10 serving utility company or district, including gas, electric, telephone, water, sewer,
11 drainage and cable television prior to the approval of the Final Map by the City. Install
12 all utilities underground, including any proposed appurtenant fixtures, connection boxes
13 or maintenance outlets, if feasible. Site and landscape any above ground utility fixtures
14 to be hidden as much as possible from public view. Prevent the proposed subdivision
15 and associated improvements from conflicting with any existing public easements.
16 Relocate any existing utilities and/or easements, which interfere with new construction
17 as approved by the affected utility provider and the City. Design service manholes to be
18 accessible by utility vehicle. Complete final street, sewer, water, gas, electric, telephone,
19 cable television and drainage improvement plans for the entire project and submit them
20 for the review and approval of the City or the utility company or district, prior to the
21 approval of the Final Map.
22
23

24 10) Prepare the Final Map by a surveyor/engineer which ties the boundary of the map into
25 the Horizontal Control System established by the County Surveyor, and submit to the
26 County Surveyor and the City a digital-graphics file of said map, both in a man
27 described in Sections 7-9-330 and 7-9-337 of the Orange County Subdivision Code and
28

COASTAL COMMISSION

EXHIBIT # 5

PAGE 4 OF 13 TTM 15497 & CDP 99-75

1 Orange County Subdivision Manual, Subarticle 18, as amended, prior to or concurrent
2 with the approval of the Final Map.

3 11) Make the following improvements, or assure construction by a financial guarantee
4 method approved by the City pursuant to Chapter 5-Improvement Security of the
5 Subdivision Map Act prior to, or concurrent with, the approval of the Final Map.
6 Prepare street improvements and precise grading plans by a registered civil engineer and
7 submit them for City review and approval. Show improvements and earthwork
8 substantially in compliance with the approved Tentative Tract Map, and include the
9 following specific requirements:
10

- 11 a) Improve Coast Highway as shown on the Tentative Tract Map and the Concept
12 Striping Plan. Obtain an Encroachment Permit from CalTrans for these
13 improvements. Submit to CalTrans a complete traffic study including future traffic
14 volumes generated and traffic signal upgrades, as well as details of the
15 improvements in the scenic highway easement.
16
17 b) Install a new four-way traffic signal at the northern entrance of the project site.
18
19 c) Modify the existing traffic signal at Wesley Drive to become a four-way traffic
20 signal.
21
22 d) Interconnect and install a coordinated signalization program for these two traffic
23 signals per the approval of the City Engineer and CalTrans.
24
25 e) Construct the MI & BI, including, but not limited to, the primary grading, roads,
26 backbone drainage facilities, backbone water distribution facilities and backbone
27 sewer system. Improve the roads with curb and gutter and the Municipal Code
28 required on-street parking. Install hydrants as determined by City staff. Agree to
prohibit streetlights within the project area.

- 1 f) Construct the Blufftop Park, including the required vertical and lateral access
2 improvements down to the beach, Scenic Highway Improvements, public parking
3 and all associated public improvements as determined by the City, including two
4 public restrooms. Install drinking fountains, showers, foot showers, benches,
5 trashcans, lighting system, irrigation system, handrails and bike racks as determined
6 by the City.
7
8 g) Refurbish the existing northern and southern paved access ramps, including
9 refurbished landing ramps, and the existing stairs in between.
10
11 h) Construct storm drainage system with sediment removal and summer nuisance water
12 diversion systems for collection and removal of contaminants contained within
13 runoff waters (more specifically described in ATTACHMENT A). Construct
14 adequate subdrains in all clean-outs, keyways and fill slopes as determined by the
15 City.
16
17 i) Remove virtually all of the concrete slab and pier by Goff Island to the maximum
18 extent feasible without damaging the surrounding natural resources, during the
19 master grading of the other portions of the site. Construct a rock groin/sea wall in an
20 approximate north-south direction connecting the mainland to Goff Island, in order
21 to: (1) maintain a stable structure that, in height, length and location, replicates the
22 function of the existing concrete slab (as generally defined in the Coastal Impact
23 Study prepared by Moffat & Nichol, Coastal Engineers, dated December 5, 1997);
24 (2) duplicate the natural conditions; and (3) stabilize the base of the existing northern
25 access ramp. Minimize the design and construction of the replacement groin/seawall
26 and cover with sand or otherwise treat to provide a reasonably natural appearance
27 the maximum extent possible, and as approved by the City, Coastal Commission,
28

COASTAL COMMISSION

EXHIBIT # 5

1 Army Corps of Engineers, Regional Water Quality Control Board and State Lands
2 Commission.

- 3 12) Enter into a subdivision agreement with the City and post adequate and sufficient surety,
4 optionally secured by a lien on the property, to assure construction and completion of all
5 remaining conditions of approval, in the event that conditions of approval are not
6 satisfied prior to the approval of the Final Map; the financing guarantee method may
7 include, but not be limited to, a bond cash deposit or combination thereof.
8
9 13) Provide a coastal engineering study for the central and southerly storm drain outlets
10 prepared by a State-registered engineer and approved by the City's Community
11 Development Department prior to the City's issuance of construction permits.
12 Specifically evaluate the potential for significant beach erosion at the storm drain outlets
13 and the ability of littoral drift and/or other natural coastal processes to replace any
14 otherwise lost material. Enter into a Beach Maintenance Agreement with the City to
15 replace beach sand after significant storm seasons or events, if there is no practicable
16 method of reducing the projected beach erosion to an insignificant level.
17
18 14) Submit precise grading plans that do for the following:
19 a) Comply with Chapter 22 of the Municipal Code, Appendix Chapter 33 of the 1997
20 Uniform Building Code and Orange County Grading and Excavation Code, as
21 amended.
22 b) Discharge individual lot drainage to discharge through curbs not connected directly
23 to common storm drains.
24 c) Establish sediment basins during the initial grading to control erosion.
25 d) Prevent any additional sheet flow from that presently existing from the tract site to
26 Coast Highway over the sidewalk and right-of-way line. Submit to CalTrans site
27
28

grading plans, hydrology and hydraulic calculations and maps to verify this condition.

- 15) Provide for full-time professional grading supervision and inspection for all grading operations. Submit "as-grade" reports, plans and certifications to the City for acceptance before lots are released for construction.
- 16) Establish a Homeowners' Association with the right to assess all properties which are jointly owned or benefited to operate and maintain all of the mutually available features of the development, including, but not limited to, the private streets, the lettered lots which are not owned or maintained by the State, County, City or other appropriate government agency, drainage structures, landscaping and slope maintenance landscaping. Prohibit the sale of Residential Estate lots or Residence Villas (condominiums) until all approved and required private streets, drainage structures, landscaping and slope maintenance landscaping are completed, or completion is assured by a financing guarantee method approved by the City.
- 17) Develop Conditions, Covenants and Restrictions (the "CC&Rs") that comply with requirements of the California Corporations Code and any other applicable state and/or federal law and submit them for preliminary review and approval by the Planning Commission and Design Review Board and for final review and approval by the Department of Community Development and City Attorney. Record approved CC&Rs prior to the first close of escrow of an individual residential lot or condominium. Provide that the CC&Rs, at a minimum, specify the following:
 - a) Stipulate provisions that provide perpetual maintenance by the associated owners of all common areas and fire protection equipment or facilities. Specify the mature growth height limits and maintenance schedules (type and frequency of pruning) for

COASTAL COMMISSION

EXHIBIT # 5

1 all vegetation that potentially impacts views. Install all landscaping in accordance
2 with approved landscaping plans. Thereafter, continuously maintain (including
3 replanting, as necessary) the landscaping in compliance with the approved
4 landscaping plans, unless such plans are subsequently revised and approved by the
5 City or are exempt as specified in Municipal Code Section 25.05.040(B).
6

- 7 b) Stipulate provisions that provide for assessments for maintenance and capital
8 improvements. Specify the amount of assessments, as well as the data and
9 procedure for their increase.
- 10 c) Stipulate provisions that specify the remedies that the Association may bring for the
11 nonpayment of assessments.
- 12 d) Stipulate in the CC&Rs that the final City approved building plans and landscaping
13 plans are binding on the Association. Require that before any changes are made to
14 constructed buildings or landscaping to first secure the approval of the City.
- 15 e) Stipulate the description, and convey in the declaration, the surface area and
16 appurtenant air space, deck, balcony, patio and private storage space as an integral
17 part of the unit. Prohibit any overlap of the common area and the private open space
18 or private storage space.
- 19 f) Stipulate that all parking spaces, including the underground garage parking spaces,
20 are solely for the purpose of parking motor vehicles, as defined in the Motor Vehicle
21 Code of the State of California.
- 22 g) Specify in a declaration that if, in the opinion of the City Manager (or authorized
23 representative), the Association at any time fails to maintain the common areas or
24 improvements thereon in accordance with the standards of repair, maintenance and
25 cleanliness specified in the declaration; the City may give written notice to the

COASTAL COMMISSION

EXHIBIT # 5

1 Association and require that the Association take appropriate corrective action
2 within 30 days of receipt of such written notice, unless there exists a hazardous
3 condition creating an immediate possibility of serious injury to persons or property,
4 in which case the time for correction may be reduced to a minimum of 5 days.
5 Appeals by the Association may be filed within 20 days of receipt of such notice of
6 deficiency, as specified in Municipal Code Chapter 2.02.
7

8 h) Specify the maximum possible legal length for the term of the CC&R's and
9 Association, that the City of Laguna Beach shall be a part of the Association and that
10 the City of Laguna Beach can enforce the CC&R provisions.

11 i) Specify that if the residential units are rented by their individual owners for 30 days
12 or less that those units shall only be rented through the Resort's reservation system.
13

14 18) Comply with the Art-In-Public Places Municipal Code Chapter 1.09, prior to the
15 approval of the Final Map.

16 19) Submit for every proposed structure, including the new access ramp, final geotechnical
17 studies for independent review, prior to construction. Follow the foundation design and
18 setback recommendations from the preliminary and final geotechnical reports.

19 20) Implement the proposed Research Design relating to archaeological exploration during
20 the grading operations for the site. Utilize, in the Research Design, backhoe trenching of
21 excavation study material as opposed to the proposed augering method. Monitor all
22 grading operations by a certified paleontologist and archaeologist. Divert equipment to
23 avoid destruction of resources until a determination can be made as to the significance of
24 the resources, if grading operations uncover paleontological or archaeological resources.
25

26 **COASTAL COMMISSION**
27 Test and preserve the site(s), if found to be significant, until a recovery plan is completed
28 to assure the protection of the paleontological or archaeological resources.

EXHIBIT # 5

- 1 21) Prepare a survey of the bluff edge ("Bluff Survey"), subject to the reasonable approval
2 of the City, prior to the completion of the improvements to the public park areas.
3 Restore the bluff edge to the location shown on the Bluff Survey as required by the City,
4 if, and to the extent, the location of the bluff edge changes from that shown on the Bluff
5 Survey due to major slope failures or minor incremental slope failures.
6
7 22) Provide a minimum of 25-feet of landscaping between the proposed new curb of Coast
8 highway and any above-grade structures. Provide for a minimum of 50-feet as a resort
9 structural setback from the existing edge of Coast Highway.
10
11 23) Prohibit Resort Villas, as defined in the LCP, and timeshare units.
12
13 24) Irrigate the Coast Highway Scenic Corridor and all of the non-residential or resort
14 landscape areas with reclaimed water, subject to review and approval of the water
15 agency with jurisdiction over the project. Provide for water conservation devices for
16 domestic and landscape water supply, pursuant to State and City laws and guidelines.
17 Include this condition on the Final Map.
18
19 25) Comply with Water Quality Measures #1 through #10 specified in ATTACHMENT A
20 of this resolution during the construction and operation of the Treasure Island Project.
21
22 26) Prepare an Erosion Control Plan by a registered Civil Engineer prior to any construction
23 in accordance with Title 22, "Excavation, Grading and Filling," of the City of Laguna
24 Beach Municipal Code. Implement, prior to and during the master grading of the site,
25 this Plan, after review and approval by the Community Development Department.
26
27 27) Revise the site plan authorized by Coastal Development Permit 99-76 and Design
28 Review 99-206 (approved by City Council on January 11, 2000) to incorporate the
physical structural and site changes shown on the revised Tentative Tract Map dated
February 1, 2000. These changes include, but are not limited to, the

1 reconfiguration/relocation of the five bungalows and the specialty restaurant located on
2 the central promontory.

3 28) In accordance with the Municipal Code, construction may occur between the hours of
4 7:00 a.m. and 6:00 p.m. on any non-holiday weekday. Maintain all construction
5 equipment, fixed and mobile, in proper operating condition with noise mufflers. Locate
6 vehicle staging areas away from off-site receivers during the later phases of project
7 development. Place stationary equipment so that emitted noise is directed away from
8 residential areas to the greatest extent possible. Discuss these measures at a pre-grade
9 meeting and implement during construction. Locate or enclose mechanical equipment,
10 such as blowers, air conditioners and exhaust fans, so that their noise is minimized to the
11 greatest extent possible when they are operating and noise levels at the property lines do
12 not exceed 65 dBA CNEL.
13

14
15 29) Dedicate the public open space and construct the planned public and visitor-serving
16 facilities prior to construction of residential development (Residential Estates and
17 Residential Villas) and prior to or concurrently with the private resort development.
18 Agree to the prohibition of the issuance, or effective date, of Building Permits or Coastal
19 Development Permits for single-family homes (Residential Estates) or condominiums
20 (Residential Villas) until: (a) the master grading has been finalized; (b) the backbone
21 infrastructure has been constructed; and (c) the Resort Center's (Hotel and any
22 associated parking structures) foundations have been built.
23

24 30) Defend, hold harmless and indemnify, at the Applicant or Developer's sole expense, the
25 City, City Council and members thereof, Commissions, Boards, officials, officers,
26 employees, agents and representatives from any and all third party claims, actions
27 proceedings to attack, set aside, void or annul the approval of this Tentative Tract Map
28

1 and Master Coastal Development Permit. Provide that such defense be provided by
2 legal counsel selected by the Applicant or Developer, subject to the consent of the City,
3 which consent shall not unreasonably be withheld. Encompass all reasonable outside
4 costs and expenses (i.e., exclusive of costs and expenses associated with salaried City
5 employees) incurred by the City in defending against any claim, action or proceeding in
6 this obligation. Cooperate fully in the defense of any claim, action or proceeding after
7 City notification to the Applicant or Developer within 10 business days of receipt.
8

9 31) Amend Figure 4.1 of the Treasure Island Coastal Development Permit notebook to
10 correspond with the approved Tentative Tract Map lot boundaries.

11 32) Reconfigure Lots 18 and 20 so that the total combined area of both lots equals a
12 maximum of 1.5 acres. The building footprint of the condominiums and the road in
13 between as measured in plan view shall not exceed a maximum of 1.5 acres.
14

15 33) Reduce the depth of the southeast half-width of Lot 3 and the full depth of Lots 4, 5 and
16 6 by 20 feet and include that gained area within a reconfigured Lot C for a 20-foot wide
17 park expansion easement and a reconfigured Lot H as fee dedication area for park land.
18 (Note: This condition was added by City Council on February 15, 2000 and once these
19 adjustments are made, the acreage totals of Lots C and H in Condition No. 5 of this
20 resolution will need to be adjusted accordingly.)
21

22 SECTION 6. The conditional approval of Tentative Tract Map 15497 and Master
23 Coastal Development Permit 99-75 shall lapse and expire two years following the effective
24 date of such conditional approval. An extension of the conditional approvals may be
25 requested by written application to the Department of Community Development and may be
26 granted by the City Council, ~~in filed prior to the expiration~~ ^{COASTAL COMMISSION} date. Any extension approval of
27 time limits of Tentative Tract Map 15497 shall be subject to the provisions of the
28

20) Other public services, including but not limited to, solid waste and public roadway capacity have been considered and are adequate to serve the proposed Project.

SECTION 5. Based on the foregoing findings, the City Council of the City of Laguna Beach hereby sustains the joint approval of and approves Project Coastal Development Permit 99-76 and Design Review 99-206 for the proposed Project, subject to the following conditions, which are deemed necessary to protect the public health, safety and general welfare and have been included to ensure continued land use compatibility:

- 1) Comply with all approved plans, specifications and programs submitted with the application for the proposed Project, including the site plan, as outlined on those plans, specifications or programs. Obtain final approval from the Planning Commission and Design Review Board of: (1) the detailed plans for furniture to be located in the Blufftop Park and Scenic Highway Corridor; (2) the specific color and materials board of the resort structures and Residence Villas (condominiums); (3) the detailed lighting, fencing and landscape plans that incorporate the recommendations of the City's landscape architect; (4) the CC&R's; (5) the landscape and building maintenance plans; and (6) a proposal on the use of San Onofre Breccia rock material in the resort architecture and hardscape landscaping.
- 2) Comply with all Project Design Features, Standard Conditions and Mitigation Measures as identified in the certified FEIR and as outlined in the Mitigation Monitoring Program. Pay for the cost of all engineers, geologists, archaeologists, paleontologists or other similar authorities or specialists that are required by the Mitigation Monitoring Program to provide services during the development of the site.

COASTAL COMMISSION

EXHIBIT # 6
PAGE 1 OF 7

CDP 99-76 & DR 99-206
January 11, 2000

- 1 3) Comply with all of the provisions of the Development Agreement, including the public
2 park area maintenance responsibilities. Maintain the public park areas, including public
3 restroom facilities, in perpetuity. Maintain public park areas in accordance with Section
4 3.1.2 of the Development Agreement or subject Lot 21 (the Resort Center parcel) to a
5 special assessment by the City pursuant to City Municipal Code Section 7.24.090.
6
7 4) Install all utilities underground, including any proposed appurtenant fixtures, connection
8 boxes or maintenance outlets, if feasible. Site and landscape any above ground utility
9 connection box fixtures to be hidden as much as possible from public view.
10
11 5) Submit precise grading plans that do for the following:
12 a) Comply with Chapter 22 of the Municipal Code, Appendix Chapter 33 of the 1997
13 Uniform Building Code and Orange County Grading and Excavation Code, as
14 amended.
15 b) Discharge individual lot drainage through curbs not connected directly to common
16 storm drains.
17 c) Establish sediment basins during the initial grading to help control erosion.
18 d) Prevent any additional sheet flow from that presently existing from the tract site to
19 Coast Highway over the sidewalk and right-of-way line. Submit to CalTrans site
20 grading plans, hydrology and hydraulic calculations and maps to verify this
21 condition.
22
23 6) Provide for full-time professional grading supervision and inspection for all grading
24 operations. Submit "as-grade" reports, plans and certifications to the City for acceptance
25 before lots are released for construction.
26
27
28

COASTAL COMMISSION

- 7) Submit for every proposed structure, including the new access ramp, final geotechnical studies for independent review, prior to construction. Follow the foundation design and setback recommendations from the preliminary and final geotechnical reports.
- 8) Provide for mechanical ventilation, such as an air conditioner system, in the main hotel units or rooms, and similar ventilation for the condominiums with living areas at or above the 110-foot MSL level.
- 9) Prepare a survey of the bluff edge ("Bluff Survey"), subject to the reasonable approval of the City, prior to the completion of the improvements to the public park areas. Restore the bluff edge to the location shown on the Bluff Survey as required by the City, if, and to the extent, the location of the bluff edge changes from that shown on the Bluff Survey due to major slope failures or minor incremental slope failures.
- 10) Designate 70 parking spaces as metered public spaces in the Blufftop Park and the aboveground parking lot at the southern end of the site.
- 11) Provide a more direct pedestrian path connection from the resort grounds to the new beach ramp entrance by providing a pedestrian path between Bungalows "C" and "D".
- 12) Reconfigure the two paths, which are proposed in the view corridor between the resort and the Blufftop Park in Lot J, into one path centrally located.
- 13) Provide a minimum of 25-feet of landscaping between the proposed new curb of Coast highway and any above-grade structures. Provide for a minimum of 50-feet as a resort structural setback from the existing edge of Coast Highway.
- 14) Prohibit Resort Villas, as defined in the LCP, and timeshare units.
- 15) Irrigate the Coast Highway Scenic Corridor and all of the non-residential or resort landscape areas with reclaimed water, subject to review and approval of the water

1 agency with jurisdiction over the project. Provide for water conservation devices for
2 domestic and landscape water supply, pursuant to State and City laws and guidelines.

3 16) Submit for review and approval by City staff a Sign Program and subsequent individual
4 sign permit applications for all proposed signs that comply with the Treasure Island
5 Specific Plan sign regulations. (City staff, at their option, may refer the review of the
6 Sign Program or individual sign permit plans to the Design Review Board for review
7 and approval.)
8

9 17) Submit for review and approval by City staff all proposed fence and monumentation
10 final construction plans, which shall generally conform to the approved fence and
11 monumentation plan. (City staff, at their option, may refer the review of such plans to
12 the Design Review Board for review and approval.) Prohibit gating of public access
13 through the residential areas of the Project, including any form of "entry cottages."
14

15 18) Comply with the City's Transportation Demand Management Ordinance (Municipal
16 Code Chapter 25.94) in the operation of the Resort, including the following: (1) devoting
17 to employee parking thirty percent (30%) of the resort's total provided parking and
18 signing it as such; (2) reserving and designating for employee carpool vehicle parking at
19 least 15% of the employee parking spaces; (3) providing for employee use a minimum of
20 15 bicycle racks, as well as male and female employee shower facilities; and (4)
21 purchasing monthly bus passes as an incentive for all employees who wish to regularly
22 use such transit for getting to and from work at the Resort.
23

24 19) Utilize an appropriately sized commercial trash compactor within an enclosed structure
25 in the Resort. Develop and incorporate a recycling program in the operation of the
26 Resort.
27

28 COASTAL COMMISSION

- 1 20) Obtain Project Coastal Development Permit(s) from the Planning Commission for any
2 portable facilities and/or visitor-serving uses proposed at the public beach, such as
3 rental/sales for beach items/supplies, towel service and beverage and snack service.
4
5 21) Comply with and implement the approved Parking Monitoring Plan. Include in the
6 parking monitoring an analysis of the parking impacts of the Project on the surrounding
7 neighborhood.
8
9 22) Limit the Resort/Hotel accommodations to a maximum of 275. Limit the specialty
10 restaurant seating to a maximum of 156 seats and the in-house restaurant to a maximum
11 of 132 seats.
12
13 23) Comply with Municipal Code Chapter 14.50, Building Code, including Section
14 14.50.034 regarding "Roofing Requirements." Allow a wood shake roof system, only
15 subject to and in compliance with the provisions of a Building Code Ordinance
16 amendment that is effective prior to the issuance of an applicable Building Permit.
17
18 24) Limit construction hours to between the hours of 7:00 a.m. and 6:00 p.m. on any non-
19 holiday weekday. Maintain all construction equipment, fixed and mobile, in proper
20 operating condition with noise mufflers. Locate vehicle staging areas away from off-site
21 receivers and occupied buildings on site during the later phases of project development.
22 Place stationary equipment so that emitted noise is directed away from residential areas
23 to the greatest extent possible. Discuss these measures at a pre-grade meeting and
24 implement during construction. Locate or enclose mechanical equipment, such as
25 blowers, air conditioners and exhaust fans, so that their noise is minimized to the
26 greatest extent possible when they are operating and noise levels at the property lines do
27 not exceed 65 dBA CNEL.
28

COASTAL COMMISSION

- 1 25) Widen the stairway/pathway through the upper part of the view corridor from five to six
2 feet.
- 3 26) Provide a drop-off turnout on the private residential road at the middle of the 100-foot
4 view corridor to enhance access to the Blufftop Park.
- 5 27) Allow up to a maximum 44% lot coverage in exchange for limiting all single-family
6 homes in the Residential Estate area to one story with height limits of a maximum of 20
7 feet above the finished pad elevation for 20% of the roof area and a maximum of 18 feet
8 for the remaining 80% of the roof area on a case-by case basis.
- 9 28) Widen the secondary path in the widest portion of the Blufftop Park to 11 feet and
10 reduce the amount of hardscape provided for backing vehicles at the north end of the
11 park.
- 12 29) Eliminate the decomposed granite entirely along the paths in the northern half of the
13 park.
- 14 30) Reduce the width of the decomposed granite along the Blufftop Park primary pathway
15 from 5 feet in width to 3 feet in the southern half of the park.
- 16 31) Provide public and visitor-serving facilities prior to construction of residential
17 development (Residential Estates and Residential Villas) and prior to or concurrently
18 with the private resort development. Prohibit the issuance of, or effective date of,
19 Building Permits or Coastal Development Permits for single-family homes (Residential
20 Estates) or condominiums (Residential Villas) until: (a) the master grading has been
21 finalized; (b) the backbone infrastructure has been constructed; and (c) the Resort
22 Center's (Hotel and any associated parking structures) foundations have been built.

COASTAL COMMISSION

1 32) Defend, hold harmless and indemnify, at the Applicant or Developer's sole expense, the
2 City, City Council and members thereof, Commissions, Boards, officials, officers,
3 employees, agents and representatives from any and all third party claims, actions or
4 proceedings to attack, set aside, void or annul the approval of this Project Coastal
5 Development Permit and Design Review. Provide that such defense be provided by
6 legal counsel selected by the Applicant or Developer, subject to the consent of the City,
7 which consent shall not unreasonably be withheld. Encompass all reasonable outside
8 costs and expenses (i.e., exclusive of costs and expenses associated with salaried City
9 employees) incurred by the City in defending against any claim, action or proceeding in
10 this obligation. Cooperate fully in the defense of any claim, action or proceeding after
11 City notification to the Applicant or Developer within 10 business days of receipt.
12

13
14 **SECTION 6.** The conditional approval of Project Coastal Development Permit 99-
15 76 and Design Review 99-206 shall lapse and expire two years following the effective date
16 of such conditional approval. An extension of the conditional approvals may be requested by
17 written application to the Department of Community Development and granted by the City
18 Council, if filed prior to the expiration date. Any extension approval of Project Coastal
19 Development Permit 99-76 and Design Review 99-206 shall be subject to applicable
20 Municipal Code Sections, as amended.
21

22 ADOPTED this 11th day of January, 2000.

23 Kathleen Blackburn
24 Kathleen Blackburn, Mayor

24 ATTEST:

25 Anna L. Reisinger
26 City Clerk

COASTAL COMMISSION

Treasure Island Letters of Project Support

COASTAL COMMISSION

EXHIBIT # 7
PAGE 1 OF 151

**ALEX WENTZEL
932 REMBRANDT DR.
LAGUNA BEACH, CA 92651**

May 5, 2000

**Peter Douglass, Executive Director
California Coastal Commission
45 Freemont Street, Ste. 2000
San Francisco, CA 94105**

Dear Mr. Douglass:

We are seventeen-year residents of Laguna Beach. We are two citizens who voted in support of the Treasure Island project. We are more committed than ever to this project and believe it is in the best interests of the citizens of Laguna Beach.

There is a small group of dissidents that have tried to sidetrack this project. They will use whatever means they can to make sure this project never gets off the ground and will nitpick to death beyond anyone's patience. They must not be allowed to prevail.

Every week of delay is a slap at the people who voted overwhelmingly in support of this project. The developers have made many compromises to try to satisfy the demands of the opponents. No matter how many concessions the developers make, this opposition group comes up with more demands. This has to come to an end.

This project is good for Laguna Beach. It is a great improvement over what has existed for decades. The opponents want no change. If this project is derailed, the citizens of Laguna Beach will be the ones who will suffer. The revenue this project will yield will help the schools and the students who attend. It will help in making city improvements. It will open the beach to both locals and visitors. The hotel will make it possible to hold large civic events.

We want this project to proceed without delay. Please approve the project and allow it to progress. Thank you for hearing us out.

Sincerely,

Alexander J. Wentzel Richard E. Anderson

Alexander J. Wentzel and Richard E. Anderson

CC: California Coastal Commission Staff

COASTAL COMMISSION

EXHIBIT # 7
PAGE 2 OF 151

HOWARD M. LARSEN
Attorney

4 Upper Newport Plaza, Suite 103
Newport Beach, California 92660
(949) 955-3600 - Tel (949) 955-1255 - Fax

May 4, 2000

RECEIVED
South Coast Region
MAY - 8 2000
CALIFORNIA
COASTAL COMMISSION

California Coastal Commission Staff
Post Office Box 1450
200 Ocean Gate, 10th Floor
Long Beach, California 90802-4416

Re: Treasure Island Coastal Development Permit ("CDP")

Dear Sir:

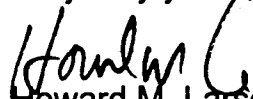
I have recently learned that a hearing is scheduled to address one of your concerns in respect to the proposed development of the Treasure Island Resort.

I have followed with interest the redevelopment plan and have attended some of the public meetings in the City of Laguna Beach. I have continued to be impressed with the plans for increased public access, the proposed public bluff top park and the overall resort.

I strongly support the approvals that have been granted by the city as well as the California Coastal Commission.

As a local resident who resides in Newport Beach I urge you to approve the CDP proposed by the Athens Group and approved by the City of Laguna Beach.

Very truly yours,


Howard M. Larsen

HML:maj

COASTAL COMMISSION

EXHIBIT # 7
PAGE 3 OF 151

Steven R. Rabago

RECEIVED
South Coast Region
5-6-2000

MAY 8 2000

Coastal Commission Staff

Subject: Treasure Island CDP, Laguna Beach
CALIFORNIA COASTAL COMMISSION

I am writing to express my support for the existing project previously approved by the California Coastal Commission and the City of Laguna Beach. The community deserves to have this project approved because it provides greater public access, an incredible bluff-top park and public serving facilities of a hotel.

I would request your approval of the Treasure Island CDP as proposed ~~to~~ by the Athens Group and approved by the City of Laguna Beach.

I would also like to remind the Cal. Coastal Commission that this project is supported by a resolution from the Laguna Beach Unified School District.

The Hon. Steven R. Rabago
Laguna Beach Resident and Member of the Laguna Beach U.S.D.

COASTAL COMMISSION

EXHIBIT # 7
PAGE 4 OF 151

Dave and Diane Connell
3055 Alta Laguna Blvd. Laguna Beach, Ca 92651
Phone: (714) 494-2065. FAX, same number, call first
May 4, 2000

California Coastal Commission
Shirley S. Dettloff, Commissioner
City of Huntington Beach
2000 Main Street
Huntington Beach, CA 92648 PO Box 1450

RECEIVED
South Coast Region
MAY - 8 2000
CALIFORNIA
COASTAL COMMISSION

Ref: June Hearing on Laguna Beach Treasure Island Project

Dear Madam Commissioner, etal.

My family has lived in Laguna Beach since 1964 and I spent many hours on the beaches here from 1938 on even though we lived in Long Beach at that time. We are very concerned that the wonderful planned Treasure Island project for Laguna Beach is once again being subjected to further delays by those few vocal radicals who wish only to destroy the entire project; just as they have done to many other worthwhile projects in Laguna Beach.

We have actively followed the Treasure Island development since its inception and have attended most of the meetings at the City, including a previous Coastal Commission hearing. We are therefor quite familiar with most of the planned aspects of the project as it changed through the long long years; and we are familiar with the personalities and goals of most of the folks on both sides of this issue.

We are convinced that this project as been *chewed over* and modified enough times and that the project as now planned and approved by the City will be a wonderful asset; not only to the City but also to the entire State. It has been obvious that even from the beginning the developers have been more than careful to protect the land and keep as much of this valuable land open to the public as is economically feasible.

This land has been unusable to the public, closed to the public, and badly treated, (*from an environmental aspect*) all the many long years it has been a trailer park. It has been an unsightly area looking more like a concentration camp than a trailer park as viewed from the highway. Huge messy, Eucalyptus and palm trees along with un-cared for shrubbery have obstructed any possible views of the coast. The existing concentration type fence and oversized vegetation have obstructed the once beautiful view sheds far more than any of the planned structures ever will.

As an older citizen with children and grandchildren eager to use this area, I plead with you to ignore the never ending complaints of the same small but vocal group and get on with this project. Please keep in mind that the REAL GOAL of most of those opposing the project is not really "improvement"; it is total destruction of the project in their never ending, over-zealous goal to stop "any development".

Respectfully,

Diane and Dave Connell
COASTAL COMMISSION

Cc: Coastal Commission Staff
Laguna Beach City Council

EXHIBIT # Coastal Com 050400
PAGE 5 OF 151

DENNIS L. HILL
737 PELICAN DRIVE
LAGUNA BEACH, CA 92651
PHONE 949/499-5740
FAX 949/497-7798
EMAIL: DMHILL@HOME.COM

RECEIVED
MAY 8 2000

CALIFORNIA
COASTAL COMMISSION

May 4, 2000

California Coastal Commission Staff
P. O. Box 1450
200 Ocean Gate, 10th Floor
Long Beach, CA 90802-4416

Re: Treasure Island Coastal Development Permit (CDP)

Dear Coastal Commissioners:

As a fifteen-year resident of Laguna Beach, I urge you to approve the coastal permit for the Treasure Island Development.

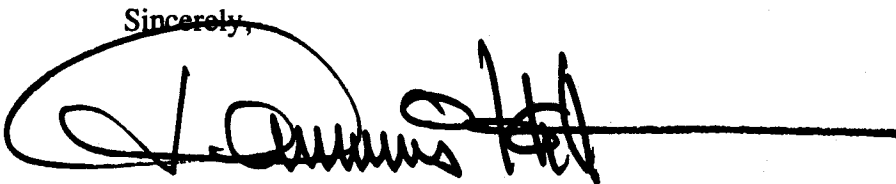
I support the City of Laguna Beach and previous California Coastal Commission approvals.

I support the redevelopment plans for increased public access, a public bluff top park and five-star resort community.

I want to see the Coastal Commission approve the Treasure Island CDP as proposed by the Athens Group and approved the City of Laguna Beach.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Dennis L. Hill", with a long horizontal line extending to the right.

Dennis L. Hill

COASTAL COMMISSION

EXHIBIT # 7
PAGE 6 OF 151

Annette B. Sherwood
12 North La Senda Dr.
Laguna Beach, CA 92651-6726
(949) 499-1591
Fax: (949) 499 4201

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South Coast Region
MAY - 8 2000
CALIFORNIA
COASTAL COMMISSION

May 4, 2000

Ms. Teresa Henry
California Coastal Commission
P.O. Box 1450
200 Ocean Gate, 10th Floor
Long Beach, CA 90802-4416

Re: Treasure Island Development in Laguna Beach

Dear Ms. Henry:

I am writing to you to urge you and the Commission to approve the project referred to above for the following reasons:

It will open up a previously private area to the public with access to a beachside park.

It will generate much needed revenue for the City and for our school systems.

It will protect and provide additional ocean views from the highway for the public to enjoy.

It will provide for a water quality management program, much needed all along our coastline.

It seems to me to meet all the requirements set forth by the Coastal Commission. I hope you will seriously consider the advantages to our community and approve the project.

Sincerely,

Annette B. Sherwood
Annette B. Sherwood

COASTAL COMMISSION

EXHIBIT # 7
PAGE 7 OF 151

MARY K. HILL

737 PELICAN DRIVE
LAGUNA BEACH, CA 92651
PHONE 949/499-5740
FAX 949/497-7798
EMAIL: DMHILL@HOME.COM

RECEIVED
South Coast Region
MAY - 8 2000
CALIFORNIA
COASTAL COMMISSION

May 4, 2000

California Coastal Commission Staff
P. O. Box 1450
200 Ocean Gate, 10th Floor
Long Beach, CA 90802-4416

Re: Treasure Island Coastal Development Permit (CDP)

Dear Coastal Commissioners:

As a fifteen-year resident of Laguna Beach, I urge you to approve the coastal permit for the Treasure Island Development.

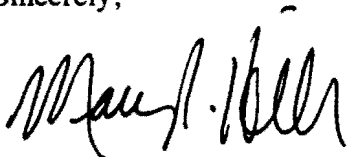
I support the City of Laguna Beach and previous California Coastal Commission approvals.

I support the redevelopment plans for increased public access, a public bluff top park and five-star resort community.

I want to see the Coastal Commission approve the Treasure Island CDP as proposed by the Athens Group and approved the City of Laguna Beach.

Thank you for your consideration.

Sincerely,



Mary K. Hill

COASTAL COMMISSION

EXHIBIT # 7
PAGE 8 OF 151

5/5/00

California Coastal Commission Staff:

I am a retired real-estate Developer. The "Treasure Island Resort" proposed development is where I want to live the remaining years God may grant me. Conceptually, it is the finest project I have ever discovered. When finished, it will bring guests from all over the world. And as does the "Pagaent", Laguna's creativity will be praised Internationally, due to this "Unique" development. "Treasure Island" can help neutralize the ~~negative~~ reputation that Laguna has, as an anti-growth community.

It's time to stop sitting on our hands and make this project a reality! From the original concept, it has been cut back mercilessly. This increases costs. Time is money. Let's get the shovels in the ground.

Respectfully.

Arnold Schwartz

Arnold Schwartz
780 Deer Haven Cle.
Palm Desert
Calif. 92211

P.S.: Benifits....

1. 14.54 ac. of lovely park-land and beaches.
2. Increased ocean views, for everyone.
3. An up-scale resort does attract "SPENDERS" to Laguna.
4. Increased Taxes Laguna needs, particularly in the area of the now over-burdened medical-care.

RECEIVED
South Coast Region

MAY - 8 2000

CALIFORNIA
COASTAL COMMISSION

COASTAL COMMISSION

EXHIBIT # 7
PAGE 9 OF 151

JBS & Associates

954 La Mirada, Laguna Beach, CA 92651 ♦ jbsassoc@earthlink.net ♦ 949.497.3673 ♦ Fax: 949.497.2623

May 3, 2000

California Coastal Commission
P.O.Box 1450
200 Ocean Gate 10th Floor
Long Beach, CA 90802-4416

RECEIVED
South Coast Region
MAY - 8 2000
CALIFORNIA
COASTAL COMMISSION

Re: Treasure Island - Laguna Beach

Ladies and Gentleman:

This letter is in support of The Athens Group and their plan to build a high quality resort in Laguna Beach.

I support the City of Laguna Beach and previous Coastal Commission approvals of the project as-is and hope the Coastal Commission will reaffirm its approval of the project.

As a professional meeting planner who has a business in Laguna Beach and lives in Laguna Beach, I'd like to keep my client's business in this community. Annually my company takes millions of dollars in hotel rooms and food and beverage out of this community because there is insufficient high class hotel room inventory or meeting space here currently. This community will only benefit from redevelopment of an aging trailer park into a world-class resort built and run by a company with the excellent reputation of The Athens Group.

The plan you have already approved opens up a stretch of coast that I have never had access to - because it was behind a locked gate. After 21 years of living in Laguna Beach the bluffs and beaches (and off street parking) can soon be open for the public to enjoy, if you follow through and deny the appeals before you.

This developer has already been scrutinized from all angles. The public, the City and the Coastal Commission have negotiated thousands of concessions. Those who say "not in my back yard" have filed appeals without merit. Approve the Treasure Island CDP as proposed by The Athens Group and approved by the City of Laguna Beach and let's start building something the majority of this community WANTS will be proud to showcase.

Sincerely,



Jeanne B. Sleeper
President

COASTAL COMMISSION

EXHIBIT # 7
PAGE 10 OF 151

3145 Mt. View Drive
Laguna Beach, CA 92651-2096
May 4, 2000

RECEIVED
MAY 8 2000
SOUTH COAST REGION

California Coastal Commission
P.O. Box 1450
200 Ocean Gate, 10th Floor
Long Beach, CA 90802-4416

ATTN: Anne Kramer

To Whom It May Concern:

RE: Treasure Island Resort Approval

We are writing regarding the appeal to the previous approvals to the Treasure Island Resort, Laguna Beach, and the Coastal Commission hearing scheduled for June in Santa Barbara.

We voted our approval of this project and feel that the owners, the Athens Group, have more than bent backwards to please all concerned.

Please approve this project so that the property owners may get on with construction, and the taxpayers can see a return on this worthy project.

The site is presently an eyesore and we feel that the proposed Resort will be a pleasure to look at and a benefit to all of us.

We appreciate the work of all involved in the past, including your Commission, but the time has come to let this project go forward without further delay.

Thank you for your attention.

Sincerely,

Harold and Sandra Werthe

Harold and Sandra Werthe

COASTAL COMMISSION

EXHIBIT # 7
PAGE 11 OF 151

**ALEX WENTZEL
932 REMBRANDT DR.
LAGUNA BEACH, CA 92651**

May 5, 2000

**Peter Douglass, Executive Director
California Coastal Commission
45 Fremont Street, Ste. 2000
San Francisco, CA 94105**

RECEIVED
MAY 11 2000
CALIFORNIA
COASTAL COMMISSION

RECEIVED
MAY 10 2000
CALIFORNIA
COASTAL COMMISSION

Dear Mr. Douglass:

We are seventeen-year residents of Laguna Beach. We are two citizens who voted in support of the Treasure Island project. We are more committed than ever to this project and believe it is in the best interests of the citizens of Laguna Beach.

There is a small group of dissidents that have tried to sidetrack this project. They will use whatever means they can to make sure this project never gets off the ground and will nitpick to death beyond anyone's patience. They must not be allowed to prevail.

Every week of delay is a slap at the people who voted overwhelmingly in support of this project. The developers have made many compromises to try to satisfy the demands of the opponents. No matter how many concessions the developers make, this opposition group comes up with more demands. This has to come to an end.

This project is good for Laguna Beach. It is a great improvement over what has existed for decades. The opponents want no change. If this project is derailed, the citizens of Laguna Beach will be the ones who will suffer. The revenue this project will yield will help the schools and the students who attend. It will help in making city improvements. It will open the beach to both locals and visitors. The hotel will make it possible to hold large civic events.

We want this project to proceed without delay. Please approve the project and allow it to progress. Thank you for hearing us out.

Sincerely,

Alexander J. Wentzel Richard E. Anderson

Alexander J. Wentzel and Richard E. Anderson

CC: California Coastal Commission Staff

COASTAL COMMISSION

EXHIBIT # 7
PAGE 12 OF 151

RECEIVED
MAY 10 2000

CALIFORNIA
COASTAL COMMISSION

May 9, 2000

California Coastal Commission Staff
PO Box 1450
200 Ocean Gate, 10th Floor
Long Beach, CA 90802-4416

Re: Treasure Island Resort
Laguna Beach, California

Ladies and Gentlemen:

I have been a resident of Laguna Beach for 23 years and am, therefore, very concerned about our city's coastal areas; the manner in which they are maintained, their public accessibility, and their ongoing aesthetic improvements.

This letter is to add my voice in support of the City of Laguna Beach and previous California Coastal Commission approvals for the Treasure Island coastal area. I support the redevelopment plans for increased public access, a public bluff top park, and a five-star resort community.

I would like the Coastal Commission to approve the Treasure Island Coastal Development Permit as proposed by the Athens Group and approved by the City of Laguna Beach.

Thank you for your time and attention to this matter.

Sincerely,



Lauren G. Packard
1550 Sunset Ridge Drive
Laguna Beach, CA 92651
949/494-5537

COASTAL COMMISSION

EXHIBIT # 7
PAGE 13 OF 151

RECEIVED
MAY 10 2000

Ms. Sara Wan, Chair
California Coastal Commission
22350 Carbon Mesa Rd.
Malibu, Ca. 90265

CALIFORNIA
COASTAL COMMISSION

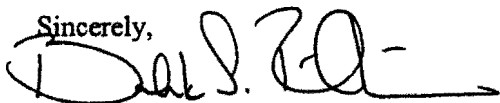
May 8, 2000

RE: Treasure Island Project

Dear Ms. Wan,

I am writing you in regards to the Treasure Island project proposed in the City of Laguna Beach. As a Civil Engineer in the state of California, I am thoroughly familiar with and support the city's decision to allow the developer to move forward with the project. I am equally familiar with the California Coastal Commission and support the past decisions it has made with similar projects. As you know, the site of Treasure Island has been an old trailer park which had been pushed to the extreme edge of the bluff face with the use of unstable fill of all sorts including rocks, dirt and broken concrete. The removal of this material would most certainly improve the stability of the bluff and would create a safe public bluff top park for the public to enjoy. I plan to attend the upcoming Coastal Commission meeting in June and strongly believe that in reviewing the project and the benefits that it would bring to the public, the Commission and it's staff would agree with me on this matter.

Sincerely,



Babak S. Milani
Civil Engineer

bsm

cc: Coastal Commission Staff

COASTAL COMMISSION

EXHIBIT # 7
PAGE 14 OF 151

Thomas M. Conner

2509 Duarte Way, Laguna Beach, CA 92651

TConner@Compuserve.com

Telephone 949/497-1302

Fax 949/497-8989

RECEIVED
MAY 10 2000

May 5, 2000

CALIFORNIA
COASTAL COMMISSION

Ms. Sara Wan, Chair
California Coastal Commission
22350 Carbon Mesa Road
Malibu, CA 90265

Reference: Treasure Island Project, Laguna Beach, CA

Dear Madam Commissioner:

My wife and I are 13 year residents of Laguna Beach and we live very close to (and within view of) the referenced project. We consider ourselves to be strong environmentalists. We have actively followed this project since its inception.

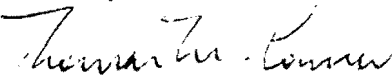
Our positions on this project are best summarized as follows. We:

- Strongly support the City of Laguna Beach and the previous California Coastal Commission approvals of this project;
- Strongly support the redevelopment plans, including the greatly increased public access, public bluff top park and the five-star resort; and
- Urge the Coastal Commission to approve the Treasure Island CDP as proposed by the Athens Group and approved by the City of Laguna.

We hope and trust that you and your fellow commissioners will conclude likewise and expeditiously.

Thank you.

Sincerely,


Thomas M. Conner


Diana L. Conner

Cc: California Coastal Commission Staff
City of Laguna Beach

COASTAL COMMISSION

EXHIBIT # 7
PAGE 15 OF 151

Martha Lydick

1284 Coronado Drive
Laguna Beach, CA 92651

RECEIVED

MAY 10 2000

CALIFORNIA
COASTAL COMMISSION

May 9, 2000

Peter Douglass
Executive Director
California Coastal Commission
45 Fremont Street, Ste. 2000
San Francisco, CA 94105

Dear Mr. Douglass:

I am writing to ask for your support of the Treasure Island Resort project in Laguna Beach. This project will add open space for the citizens of Laguna Beach to enjoy. It will bring much needed tax revenue to keep Laguna Beach clean and beautiful.

Treasure Island has been a private enclave for years where only a few could enjoy its natural beauty. The Athens Group plan will open it for all to use and enjoy. The intimate hotel, the restaurant, the bluff top park - all special for all to enjoy. The homes and condos are in good taste and will blend with the surroundings.

Please support the City of Laguna Beach and its citizens in this very worthy project by approving the Treasure Island CDP as proposed by the Athens Group.

Cordially yours,



cc: California Coastal Commission Staff

COASTAL COMMISSION

EXHIBIT # 7
PAGE 16 OF 151

75 Monarch Bay Drive
Dana Point, CA 92629

May 7, 2000

Ms. Anne Kramer
California Coastal Commission
PO Box 1450
200 Ocean Gate, 10th Floor
Long Beach, CA 90802-4416

RECEIVED
MAY 10 2000

CALIFORNIA
COASTAL COMMISSION

Dear Coastal Commission members and staff,

I have visited the Treasure Island property and support the redevelopment plans for this beautiful piece of coast. Development will provide increased public access where none now exists.

While I do not live in Laguna Beach, I live in a community just a few miles south and support that city's decision to back the Coastal Development Permit. I look forward to visiting the park when it is completed. Many of my neighbors feel the same way.

Very truly yours,



Leonard Kranser

COASTAL COMMISSION

EXHIBIT # 7
PAGE 17 OF 151

ARTHUR J. CASEBEER
260 VIEJO STREET
LAGUNA BEACH, CALIFORNIA 92651

RECEIVED
MAY 10 2000

May 8, 2000

CALIFORNIA
COASTAL COMMISSION

California Coastal Commission Staff
PO Box 1450
200 Oceangate, 10th Floor
Long Beach, CA 90802-4416

To Whom It May Concern:

I urge you to approve the Treasure Island CDP, as approved by the City of Laguna Beach.

My wife and I, having been full time residents of this city since the early seventies; are well aware of coastal bluff top hazards and structural failures which occurred as a result of unsafe construction and landscaping near the edge of the bluff top.

Many of these unsafe conditions still exist along the coastal bluffs where the Treasure Island facility is proposed. In order to address these problems, extensive, professional, geological, structural and landscape studies were conducted by recognized experts in coordination with the city and specific "corrective action" plans were developed to mitigate the potential hazards.

Having participated in many conferences on the project and speaking as a retired Professional Engineer and Planning Commissioner, I am fully supportive of this project and recommend that you approve the Treasure Island CDP as proposed by the Athens Group and approved by the City of Laguna Beach.

Sincerely,


Art Casebeer

COASTAL COMMISSION

EXHIBIT # 7
PAGE 18 OF 151

W. W. & Ann W. McDonald
267 Crescent Bay Drive
Laguna Beach, California 92651-1322
Fax 949-494-3270
Home Phone 949-494-0250
Email AnnLaguna@AOL.Com

RECEIVED
MAY 10 2000

CALIFORNIA
COASTAL COMMISSION

May 06, 2000

Ms. Sara Wan, Chair
California Coastal Commission
22350 Carbon Mesa Road
Malibu, CA 90265

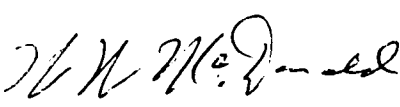

Re: Treasure Island Resort

Dear Ms. Wan:

We are very familiar with the long process the developers of Treasure Island Resort have gone through to obtain the necessary City and Commission approvals. At this point we strongly feel that they have met all necessary requirements for a quality resort development which will be an asset to the City of Laguna Beach.

This is to advise you that we support the decisions made by the City of Laguna Beach and all previous California Coastal Commission approvals. We ask you not to delay this process any further and approve the Treasure Island CDP as proposed by the Athens Group and approved by the City of Laguna Beach.

Sincerely,

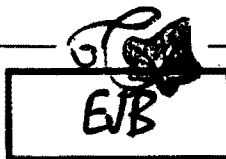
W. W. McDonald

Ann W. McDonald

cc: Coastal Commission Staff

COASTAL COMMISSION

EXHIBIT # 7
PAGE 19 OF 151



Ella J. Bledsoe
251 Lower Cliff Drive, #11 ~ Laguna Beach, CA 92651

May 9, 2000

Peter Douglass
Executive Director
California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, CA 94105

RECEIVED
MAY 11 2000
CALIFORNIA
COASTAL COMMISSION

Dear Mr. Douglass:

I am a fairly new resident of Laguna Beach but feel like I've been here forever. I was a frequent visitor to this beautiful city for the past 40 years. I was never able to see the area known as Treasure Island because it was a private trailer park. I have followed the planning process presented by the Athens Group very carefully and am very pleased with the project.

I am handicapped with crippling arthritis and am looking forward to the time when I can enjoy the natural splendor of Treasure Island, when I will be driven to the hotel where I can stroll through the bluff park, sit and enjoy the ocean vistas, dine at a fine restaurant and when my family visits, they can stay at a 5-star resort.

Please hurry and approve these wonderful plans - I am not getting any younger!

Sincerely yours,

cc: California Coastal Commission Staff

COASTAL COMMISSION

EXHIBIT # 7
PAGE 20 OF 151

J. Walker Reed
439 Los Robles
Laguna Beach, CA. 92651
(949) 494-8038

RECEIVED
MAY 11 2000

May 10, 2000

CALIFORNIA
COASTAL COMMISSION

California Costal Commission
200 Ocean Gate, 10th Floor
Long Beach, CA. 90802-4416

Dear Sirs/Madam;

I am writing in support of approval of the Treasure Island Coastal Development Permit. I understand this project was previously approved by the Commission and now believe it to be an even stronger project.

The voters of Laguna Beach in a special election voted to have this project built. The project now planned will be of great economic and aesthetic benefit to our community. Additionally, it is my opinion that the best way to replenish, protect, and maintain this very sensitive intertidal marine habitat is to create an upscale resort allowing appropriate beach access and visitor education where none now exists.

At this late date (following a difficult election), I believe the system of review and appeal set up to catch and stop bad land use and development has, in this instance, been abused by a very small group of zealots who have no real alternative to offer and who represent but only a small vocal fraction of our community. I believe their obstructionist activities are bordering on contempt for the system and democratic process.

Please approve the Treasure Island Resort! The pathetic trailer park property needs this development, the neighbors want it, our schools need it, and it is the best way to protect the intertidal marine environment.

Sincerely,


J. Walker Reed

Family Resident since 1962.

Founding President: Laguna Beach High School Alumni Association

Former Vice President Coalition of Neighborhood Associations.

Former Vice Chairman: Parking, Traffic & Circulation Committee

Member: SurfRider Foundation

Secretary: Laguna Beach Business Club

Member: Laguna Beach Vision Committee 2000

COASTAL COMMISSION

EXHIBIT # 7
PAGE 21 OF 151

Teresa Henry
California Coastal Commission
P.O. Box 1450
200 Ocean Gate, 10th Floor
Long Beach, CA 90802-4416

RECEIVED
MAY 11 2000

CALIFORNIA
COASTAL COMMISSION

To Teresa Henry:

Re: Treasure Island Development by the Athens Group

1. I support the City of Laguna Beach and the previous California Coastal Commission approval.
2. I support the redevelopment plans for increased public access, a public bluff top park and a five star resort community.
3. I want to see the Coastal Commission approve the Treasure Island CDP as proposed by the Athens Group and approved by the City of Laguna Beach.

Respectively Submitted,



Richard Jahraus
75 year resident
450 Cliff Dr.
Laguna Beach

COASTAL COMMISSION

EXHIBIT # 7
PAGE 22 OF 151

Mr. John C. Hill
180 Golden Oak Dr.
Portola Valley, CA 94028

RECEIVED
MAY 11 2000
CALIFORNIA
COASTAL COMMISSION

May 8, 2000

Mr. Peter Douglass, Executive Director
California Coastal Commission
45 Fremont St., Ste. 2000
San Francisco, CA 94105

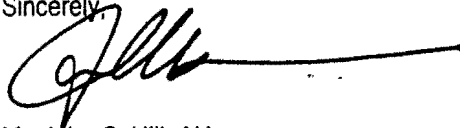
Dear Mr. Douglass:

I am writing to register my support for the Treasure Island Coastal Development Permit as proposed by the Athens Group and as approved by the City of Laguna Beach. I support the City of Laguna Beach and previous California Coastal Commission approvals, the redevelopment plans for increased public access, and the public bluff-top park and five-star resort community.

I believe this development would be a great asset to the Laguna area, as the public will gain additional access to the coast, some of which was previously blocked. Significantly, much of the developed project will be retained as new parkland and public amenities and views to the ocean from coast highways will be vastly improved. The resort itself and its restaurants will also be open to the public and will afford beautiful ocean and coastline views complementing the entire area.

I would urge the Coastal Commission to approve the Treasure Island CDP as proposed by Athens Group and approved by the City of Laguna Beach and thank you for your consideration.

Sincerely,



Mr. John C. Hill, AIA
Principal

Cc: Coastal Commission Staff

COASTAL COMMISSION

EXHIBIT # 7
PAGE 23 OF 151

May 5, 2000

Ms. Sara Wan, Chair
California Coastal Commission
22350 Carbon Mesa Road
Malibu, CA 90265

RECEIVED
MAY 12 2000
CALIFORNIA
COASTAL COMMISSION

Subject: Treasure Island Resort
Laguna Beach, CA

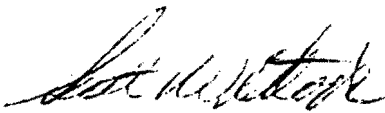
Dear Ms. Wan:

I have been a resident of Laguna Beach for twenty-eight years and have seen development plans for the above referenced property come and go. The current plan to develop this property is by far the best plan I've seen. With beach access and a bluff top park, this proposed five star resort offers the greatest benefit to the community and public at large. Removal of the trailers and restoration of the bluff top to its original condition provides an opportunity to rid our pristine coastline of a real eye sore.

As a concerned resident I have viewed the model, met with the developer and city officials, and am of the opinion this project will create an environment everyone can enjoy for years to come.

I support the City of Laguna Beach and previous California Coastal Commission approvals and ask that the Coastal Commission approve the Treasure Island CDP as proposed by The Athens Group and approved by the City of Laguna Beach.

Sincerely,



Scott L. Whitlock
1981 San Remo Drive
Laguna Beach, CA 92651

cc Coastal Commission Staff

COASTAL COMMISSION

EXHIBIT # 7
PAGE 24 OF 151

Martha Lydick

1284 Coronado Drive
Laguna Beach, CA 92651

RECEIVED
MAY 15 2000
CALIFORNIA
COASTAL COMMISSION

RECEIVED
MAY 12 2000
CALIFORNIA
COASTAL COMMISSION

May 9, 2000

Peter Douglass
Executive Director
California Coastal Commission
45 Fremont Street, Ste. 2000
San Francisco, CA 94105

Dear Mr. Douglass:

I am writing to ask for your support of the Treasure Island Resort project in Laguna Beach. This project will add open space for the citizens of Laguna Beach to enjoy. It will bring much needed tax revenue to keep Laguna Beach clean and beautiful.

Treasure Island has been a private enclave for years where only a few could enjoy its natural beauty. The Athens Group plan will open it for all to use and enjoy. The intimate hotel, the restaurant, the bluff top park - all special for all to enjoy. The homes and condos are in good taste and will blend with the surroundings.

Please support the City of Laguna Beach and its citizens in this very worthy project by approving the Treasure Island CDP as proposed by the Athens Group.

Cordially yours,

Martha Lydick

cc: California Coastal Commission Staff

COASTAL COMMISSION

FILE # 7
PAGE 25 OF 151

EJB

Elia J. Bledsoe

251 Lower Cliff Drive, #11 ~ Laguna Beach, CA 92651

RECEIVED
MAY 15 2000

RECEIVED

CALIFORNIA
COASTAL COMMISSION

MAY 12 2000

CALIFORNIA
COASTAL COMMISSION

May 9, 2000

Peter Douglass
Executive Director
California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, CA 94105

Dear Mr. Douglass:

I am a fairly new resident of Laguna Beach but feel like I've been here forever. I was a frequent visitor to this beautiful city for the past 40 years. I was never able to see the area known as Treasure Island because it was a private trailer park. I have followed the planning process presented by the Athens Group very carefully and am very pleased with the project.

I am handicapped with crippling arthritis and am looking forward to the time when I can enjoy the natural splendor of Treasure Island, when I will be driven to the hotel where I can stroll through the bluff park, sit and enjoy the ocean vistas, dine at a fine restaurant and when my family visits, they can stay at a 5-star resort.

Please hurry and approve these wonderful plans - I am not getting any younger!

Sincerely yours,

Elia J. Bledsoe

cc: California Coastal Commission Staff

COASTAL COMMISSION

FILED 6 7
PAGE 26 OF 151

Linda & John O'Neill
31567 Catalina Avenue
Laguna Beach, CA 92651

May 11, 2000

RECEIVED
South Coast Region

MAY 15 2000

CALIFORNIA
COASTAL COMMISSION

Executive Director, Peter Douglas
California Coastal Commission
45 Fremont Ave, #2000
San Francisco, California 94105

Dear Director Douglas,

As a resident of Laguna Beach for the last 12 years I have looked with envy at those individuals who were lucky enough to live in the area of Laguna Beach known as Treasure Island. It seemed strange to me that the beautiful stretch of California coast could be the sole property of individuals in a trailer park.

I was very thrilled when the Treasure Island Coastal Program was approved by your Commission.

The idea of opening up the area to the community and visitors from all over the world is a wonderful gift to those who live here now and for future generations to come.

I thank you for the care and thought you have given this project. Please, move the project forward. Our community has approved the plans by a majority. Laguna won't let this resort. Please help us dream of a world class park and resort come true.

Sincerely Linda O'Neill

COASTAL COMMISSION

EXHIBIT # 7
PAGE 27 OF 151

John & Linda O'Neill
31567 Catalina Avenue
Laguna Beach, CA 92651

May 11, 2000

Commissioner Sara Wan, Chairman
California Coastal Commission
45 Front Avenue #2000
San Francisco, California 94105-2219

RECEIVED
South Coast Region
MAY 15 2000
CALIFORNIA
COASTAL COMMISSION

Dear Chairperson Wan,

As a resident of Laguna Beach for the last 12 years I have looked with envy at those people who were lucky enough to live in the area of Laguna Beach known as Treasure Island. It seemed strange to me that this beautiful stretch of land and coastal frontage could be the sole property of individuals as a trailer park.

I was extremely thrilled the Treasure Island Inland Coastal Program was approved by your commission. The idea of opening up this area to the community and visitors from all over the world is a wonderful gift to those of us who live here now and for the future generations to come.

Thank you for the care and thought you have given to this project. Please, I urge you to move forward with the plan at this time. Our community has approved the project by a majority. Please help us see our dream come true.

Sincerely, John & Linda O'Neill

EXHIBIT # 7
PAGE 20 OF 151

Sara Wan, Chair
45 Fremont Avenue, Ste. 2000
San Francisco, CA 94105-2219

May 11, 2000

RECEIVED
South Coast Region
MAY 15 2000
CALIFORNIA
COASTAL COMMISSION

Dear Ms. Wan and Members of the Coastal Commission:

Please go ahead with approval for the Treasure Island project in Laguna Beach! As an active member of the Laguna Beach community I am eagerly awaiting the redevelopment of this abandoned mobile home site.

Currently, this site is locked behind gates and of no use to anyone. When redeveloped it will allow the public to enjoy increased public access to the beautiful coastline. I look forward to the day that I can come to Treasure Island with my friends and family.

I understand that you are reviewing a single issue regarding the grading of the bluff. Without this type of grading the park would not be able to exist. I believe that the developers will do an excellent job and assure us a park that will be safe and environmentally stable for years to come.

Please approve the Treasure Island project with no further delay!

Thank you for your attention to this matter.

Sincerely,



Melissa Cavanaugh

CC: Anne Kramer, Deborah Lee and Staff
California Coastal Commission
P.O. Box 1450
200 Oceangate, 10th Floor
Long Beach, CA 90802-4416

COASTAL COMMISSION

EXHIBIT # 7
PAGE 29 OF 151

May 10, 2000

Commissioner Sara Wan, Chairman
California Coastal Commission
45 Fremont Avenue, suite #2000
San Francisco, CA 94105-2219

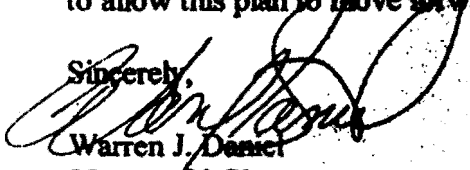
Dear Chairperson Wan

After many years of debate over how to redevelop the Treasure Island mobile home site, the community and the City have come up with a plan that is both respectful of the land and also provides the people of California with many benefits. The Coastal Commission unanimously approved an LCP two years ago! Since that time the project was approved by a majority of the community in a referendum election and spent nine months in a very thorough entitlement process. Currently the plan has been refined to include more park space and reduced the number of homes on the site from 37 to 31.

This plan has been thoroughly studied and reviewed. Now it is time to move forward. I strongly urge the Coastal Commission to support the Treasure Island Local Coastal Program and let this plan move forward without further delays.

As a resident of the community, I thank you for your stewardship of our coastline. Please know that you are doing the right thing in the eyes of this community by voting to allow this plan to move forward without further delays.

Sincerely,


Warren J. Daniel
29 Emerald Glen
Laguna Niguel, CA 92677

Cc: Calif. Coastal Commission Staff

RECEIVED
South Coast Region
MAY 15 2000
CALIFORNIA
COASTAL COMMISSION

COASTAL COMMISSION

EXHIBIT 7
PAGE 30 OF 151

Sara Wan, Chair
45 Fremont Avenue, Ste. 2000
San Francisco, CA 94105-2219

May 11, 2000

Dear Ms. Wan and Members of the Coastal Commission:

Please go ahead with approval for the Treasure Island project in Laguna Beach! As an active member of the Laguna Beach community I am eagerly awaiting the redevelopment of this abandoned mobile home site.

Currently, this site is locked behind gates and of no use to anyone. When redeveloped it will allow the public to enjoy increased public access to the beautiful coastline. I look forward to the day that I can come to Treasure Island with my friends and family.

I understand that you are reviewing a single issue regarding the grading of the bluff. Without this type of grading the park would not be able to exist. I believe that the developers will do an excellent job and assure us a park that will be safe and environmentally stable for years to come.

Please approve the Treasure Island project with no further delay!

Thank you for your attention to this matter.

Sincerely,



Melissa Cavanaugh

CC: Anne Kramer, Deborah Lee and Staff
California Coastal Commission
P.O. Box 1450
200 Oceangate, 10th Floor
Long Beach, CA 90802-4416

RECEIVED
Coast Region
MAY 15 2000
CALIFORNIA
COASTAL COMMISSION

COASTAL COMMISSION

EXHIBIT # 7
PAGE 31 OF 151

Ann H. Quilter
20976 Laguna Canyon Road
Laguna Beach, CA 92651

RECEIVED
South Coast Region

MAY 15 2000

CALIFORNIA
COASTAL COMMISSION

Commissioner Shirley Detloff
California Coastal Commission
City of Huntington Beach
2000 Main Street
Huntington Beach, CA 92648

May 8, 2000

Dear Commissioner Detloff,

As a 25 year resident of Laguna Beach and as a member of the Laguna Greenbelt and Laguna Canyon Conservancy, I urge your approval of the project at Treasure Island. This project has undergone strenuous public scrutiny over the past three years. I firmly believe that the City, with its numerous public hearings, has addressed the needs and desires of our community. I believe that it is in compliance with the local coastal plan.

I have lived in Laguna for 25 years; and until the property was open to the public during the hearings, I had never stepped foot on its beaches or bluff tops. I am thrilled over the prospects of this property finally being open to the public. I can't wait to sit on its beaches and stroll along the public park.

As an environmentalist, I am confident that the Athens group will protect our magnificent coastal resource through its resource management plan. The tidepools have been desecrated over the past few years with marine life slowly being stripped from the rocks. The fact that there will now be monitoring and supervision of this precious resource will assist in the tidepools' regeneration.

I have children in the Laguna Beach school system and am cognizant of the benefits this resort will bring to Laguna. We will now have public assets that do not currently exist in Laguna - mainly a ballroom and conference rooms to accommodate our needs. Our seniors will now have a place to hold their Senior Prom and our school foundation board will not have to leave town to hold its big fundraising ball. These are public goods that our community demanded the developer include.

Laguna stands to benefit tremendously with this project. I am excited about it and urge your expeditious approval.

Sincerely,



Ann H. Quilter

Cc: Coastal Commission staff

COASTAL COMMISSION

EXHIBIT # 7
PAGE 32 OF 151

May 10, 2000

Commissioner Sara Wan, Chairman
California Coastal Commission
45 Fremont Avenue, Suite 2000
San Francisco CA 94105-2219

RECEIVED
South Coast Region
MAY 15 2000
CALIFORNIA
COASTAL COMMISSION


Dear Chairperson Wan,

After years of debate over how to redevelop the Treasure Island mobile home site, the community and the City have come up with a plan that is the best use of the site and provides to the general public many benefits, not to just a few. The Coastal Community unanimously approved an LCP two years ago. Since that time, the project was approved by a majority of the community in a referendum election and spent nine months in a very thorough entitlement process. Currently, the plan has been refined to include more park space and reduce the number of homes on the site from 37 to 31.

This plan has been thoroughly studied and reviewed. Now it is time to move forward and not waste anymore time. I urge the Coastal Commission to support the Treasure Island Local Coastal Program and let this plan move forward without further delays.

As a business owner of the Laguna Beach community, I thank you for stewardship of our coastline. Please know that you are doing the right thing in the eyes of this community by voting to allow this plan to move forward.

Sincerely,


Jill Richards
President
Port Jackson Fine Art
1550 S. Coast Highway
Laguna Beach

cc:
PO Box 1450
200 Ocean Gate 10th Fl
Long Beach CA 90802-4416

COASTAL COMMISSION

EXHIBIT # 7
PAGE 33 OF 151

ARTHUR J. CASEBEER
260 VIEJO STREET
LAGUNA BEACH, CALIFORNIA 92651

May 8, 2000

California Coastal Commission Staff
PO Box 1450
200 Oceangate, 10th Floor
Long Beach, CA 90802-4416

RECEIVED
South Coast Region
MAY 15 2000
CALIFORNIA
COASTAL COMMISSION

To Whom It May Concern:

I urge you to approve the Treasure Island CDP, as approved by the City of Laguna Beach.

My wife and I, having been full time residents of this city since the early seventies, are well aware of coastal bluff top hazards and structural failures which occurred as a result of unsafe construction and landscaping near the edge of the bluff top.

Many of these unsafe conditions still exist along the coastal bluffs where the Treasure Island facility is proposed. In order to address these problems, extensive, professional, geological, structural and landscape studies were conducted by recognized experts in coordination with the city and specific "corrective action" plans were developed to mitigate the potential hazards.

Having participated in many conferences on the project and speaking as a retired Professional Engineer and Planning Commissioner, I am fully supportive of this project and recommend that you approve the Treasure Island CDP as proposed by the Athens Group and approved by the City of Laguna Beach.

Sincerely,


Art Casebeer

COASTAL COMMISSION

EXHIBIT # 7
PAGE 34 OF 151

2365 San Clemente Street
Laguna Beach, CA 92651

RECEIVED
South Coast Region

MAY 15 2000

CALIFORNIA
COASTAL COMMISSION

May 12, 2000

Commissioner Shirley Dettloff
California Coastal Commission
City of Huntington Beach
2000 Main Street
Huntington Beach, CA 92648

Dear Commissioner Dettloff:

As a resident of Laguna Beach I completely and wholeheartedly support the Treasure Island project. I ask you to please look at all of the benefits this project offers and support it moving forward at your June, Coastal Commission hearing.

I am one of the lucky few in Laguna Beach who have had a chance to experience the beauty of Treasure Island. Most of this community has never had a chance to see this incredible site. It is a shame that this site has remained gated for so long. This project offers an opportunity to open up this site to the public. The Treasure Island plan as proposed offers increased access to the beach and it offers parking, which is key in Laguna Beach. We will also have a large bluff top public park overlooking the beach that will provide an incredible amenity to our community.

Please do not delay this plan any longer. It is time for this beautiful project to become a reality. Please help make our dreams come true and vote in support of the Treasure Island project!

Thank you.

Sincerely,



Ed Gillow

Cc: California Coastal Commission
Long Beach

COASTAL COMMISSION

EXHIBIT # 7
PAGE 35 OF 151

Dianne Reardon
35 Laguna Woods Drive
Laguna Niguel, CA 92677

RECEIVED
South Coast Region

MAY 15 2000

CALIFORNIA
COASTAL COMMISSION

Commissioner Shirley Detloff
California Coastal Commission
City of Huntington Beach
2000 Main Street
Huntington Beach, CA 92648

May 12, 2000

Dear Commissioner Detloff,

As an exhibiting artist in Laguna Beach, I am writing to encourage the Commission to give final approval to the Treasure Island Redevelopment Plan. This project, with new housing facilities will in my opinion, will substantially increase the purchase of artwork in the community, which will be of major benefit to all exhibiting artists.

The project will provide substantial public parkland and access to a beach that has been private property for way too many years.

I support this project and ask that you please allow the plan to move forward without further changes or delay.

Thank you for your commitment to protecting and providing access to our beautiful beaches and coastline.

Sincerely,


Diane Reardon

Cc: California Coastal Commission Staff

COASTAL COMMISSION

EXHIBIT # 7
PAGE 36 OF 151

GREGORY CHRISTIAN ABEL
contractor - designer

855 La Vista Drive, ~ Laguna Beach, CA 92651
(949) 497-3442 Fax (949) 497-3451

May 11, 2000

RECEIVED
South Coast Region

MAY 15 2000

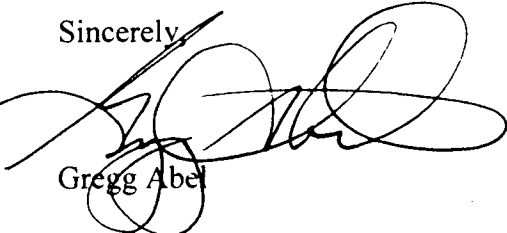
CALIFORNIA
COASTAL COMMISSION

California Coastal Commission Staff
P. O. Box 1450
200 Ocean Gate 10th Floor
Long Beach, CA 90802-4416

The Abel family has resided in the City of Laguna Beach since 1937. As an Architectural Designer and Builder, I am proud to be continuing the tradition of artistic growth and development of my predecessors. I am sensitive to how our city evolves and I participate actively at the design level to ensure that this original art colony maintains its charm.

The Treasure Island Resort as planned by the Athens Group, has prevailed through countless meetings and hearings and proven that this Resort will have a positive impact on our community. I have walked the bluff in question many times both as a guest of Treasure Island and as a Designer/Builder. The bluff needs help and none too soon. The many years of poorly designed efforts to shore up this man made bluff, have only served to erode the stability. The natural bluff line has long since disappeared due to neglect, weather, and needs to be modified using current geological means. The finished project will be a safe bluff and an enjoyable park for generations to come. Please lend your support to the Treasure Island Resort by approving this last hurdle for this fine community project.

Sincerely,


Gregg Abel

COASTAL COMMISSION

Cal. St. Lic. no. 727668



EXHIBIT # 7
PAGE 37 OF 151

May 10, 2000

Commissioner Sara Wan, Chairman
California Coastal Commission
45 Fremont Avenue, suite #2000
San Francisco, CA 94105-2219

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South Coast Region
MAY 15 2000
CALIFORNIA
COASTAL COMMISSION

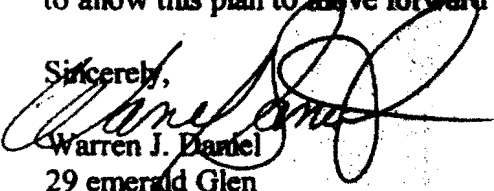
Dear Chairperson Wan

After many years of debate over how to redevelop the Treasure Island mobile home site, the community and the City have come up with a plan that is both respectful of the land and also provides the people of California with many benefits. The Coastal Commission unanimously approved an LCP two years ago! Since that time the project was approved by a majority of the community in a referendum election and spent nine months in a very thorough entitlement process. Currently the plan has been refined to include more park space and reduced the number of homes on the site from 37 to 31.

This plan has been thoroughly studied and reviewed. Now it is time to move forward. I strongly urge the Coastal Commission to support the Treasure Island Local Coastal Program and let this plan move forward without further delays.

As a resident of the community, I thank you for your stewardship of our coastline. Please know that you are doing the right thing in the eyes of this community by voting to allow this plan to move forward without further delays.

Sincerely,


Warren J. Daniel
29 Emerald Glen
Laguna Niguel, CA 92677

Cc: Calif. Coastal Commission Staff

COASTAL COMMISSION

EXHIBIT # 7
PAGE 38 OF 151

RECEIVED
South Coast

MAY 18 2000

COASTAL COMMISSION

W. W. & Ann W. McDonald
267 Crescent Bay Drive
Laguna Beach, California 92651-1322
Fax 949-494-3270
Home Phone 949-494-0250
Email AnnLaguna@AOL.Com

May 06, 2000

Ms. Sara Wan, Chair
California Coastal Commission
22350 Carbon Mesa Road
Malibu, CA 90265

Re: Treasure Island Resort

Dear Ms. Wan:

We are very familiar with the long process the developers of Treasure Island Resort have gone through to obtain the necessary City and Commission approvals. At this point we strongly feel that they have met all necessary requirements for a quality resort development which will be an asset to the City of Laguna Beach.

This is to advise you that we support the decisions made by the City of Laguna Beach and all previous California Coastal Commission approvals. We ask you not to delay this process any further and approve the Treasure Island CDP as proposed by the Athens Group and approved by the City of Laguna Beach.

Sincerely,



W. W. McDonald

Ann W. McDonald

cc: Coastal Commission Staff

COASTAL COMMISSION

EXHIBIT 6 7
PAGE 39 OF 151



May 10, 2000

RECEIVED
South Coast Region

MAY 15 2000

CALIFORNIA
COASTAL COMMISSION

Anne Kramer
California Coastal Commission
P.O. Box 1450
200 Ocean Gate, 10TH Floor
Long Beach, CA 90802-4416

Dear Ms. Kramer;

On behalf of the Board of Directors, staff and artists of the Laguna Playhouse, I wish to encourage the California Coastal Commission to approve the Treasure Island Coastal Development Permit at your June meeting in Santa Barbara.

We are steadfast in our support of the City of Laguna Beach and previous California Coastal Commission approvals. We support the redevelopment plans for increased public access, a public bluff top park and a five-star resort community and want to see the Coastal Commission approve the Treasure Island CDP as proposed by the Athens Group and approved by the City of Laguna Beach.

The overwhelming majority of Laguna Beach residents have long awaited the clean-up and redevelopment of the Treasure Island property. *Please give your speedy approval to the Treasure Island Coastal Development Permit!*

Highest Regards,

Richard Stein
Executive Director

COASTAL COMMISSION

EXHIBIT # 7
PAGE 40 OF 151

DAVID V. WHITING

P.O. Box 1108 • TUSTIN, CALIFORNIA 92781

May 10, 2000

RECEIVED
South Coast Region
MAY 15 2000
CALIFORNIA
COASTAL COMMISSION

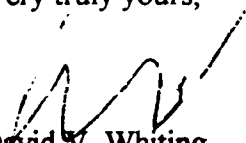
Shirley S. Dettloff, Commissioner
California Coastal Commission
City of Huntington Beach
2000 Main Street
Huntington Beach, CA 92648

Dear Ms. Dettloff:

I am writing in support of the Treasure Island Coastal Development Permit. It has been my opinion consistently, that this project has made excellent use of the land. The redevelopment plans offer more than required public access, less than required density and an environmental setting and five-star resort community that will do nothing but enhance the City of Laguna Beach. Further, the City of Laguna Beach, as well as the Coastal Commission, have previously approved the project and I strongly support that approval being upheld. Everything I see about this project is positive and I would hope to see it continue that way.

Again, I solicit the Coastal Commission's approval of the Treasure Island CDP as proposed by the Athens Group and approved by the City of Laguna Beach.

Very truly yours,



David V. Whiting

DVW/jt

✓ cc: California Coastal Commission Staff

COASTAL COMMISSION

7
PAGE 41 OF 151

Valarie and David Whiting

May 12, 2000

Sara Wan, Chair
California Coastal Commission
45 Fremont Ave #2000
San Francisco, Ca 94105-2219

RECEIVED
South Coast Region
MAY 15 2000
CALIFORNIA
COASTAL COMMISSION

RE: Treasure Island Property, Laguna Beach, CA

Dear Chairwoman Wan and Members of the Coastal Commission:

We are writing the Commission urging you to give final approval to the referenced project. This project will provide access to land that has heretofore been unavailable to the public.

For years this land contained a transient trailer park that was built and operated with absolutely no consideration for public access, safety or environmental considerations. As a result, the land needs to be repaired and brought up to today's environmental and safety standards.

After carefully reviewing the plans proposed by The Athens Group, we are confident that their project as submitted would yield repairs to the damaged bluff, a beautiful PUBLIC park, a much-needed view corridor, a 5-star resort, and substantial economic benefits to the City of Laguna Beach.

As longtime residents of Laguna Beach within one mile of the site, we strongly encourage you to approve the Treasure Island Project without delay. Anything less would be unconscionable.

Sincerely,



Valarie Whiting



David Whiting

✓ Cc:
Staff
California Coastal Commission
PO Box 1450
200 Oceangate, 10 Floor
Long Beach, CA 90802

COASTAL COMMISSION

EXHIBIT # 7
PAGE 42 OF 151

Post Office Box 9456 • Laguna Beach • California 92652

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MAY 16 2000

CALIFORNIA
COASTAL COMMISSION

May 15, 2000

Sara Wan, Chair
Calif. Coastal Commission
45 Fremont Ave. Suite 2000
San Francisco, CA 94105-2219

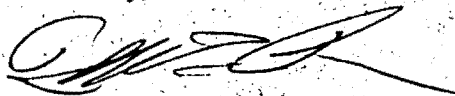
Dear Chairperson Wan:

After years of debate over how to redevelop the Treasure Island mobile home site, the community and the City have come up with a plan that is respectful of the land and provides the people of California many benefits. Since that time the project was approved by a majority of the community in a referendum election and spent nine months in a very thorough entitlement process. Currently, the plan has been refined to include more park space and reduced the number of homes on the site from 37 to 31.

This plan appears to have thoroughly studied and reviewed. There does not appear to be anything gained by further delay. I urge the Coastal Commission to support the Treasure Island Local Coastal Program.

As a resident of the Laguna Beach community, I thank you for your consideration of our coastline. The Commission should feel comforted that all reasonable issues have been addressed in voting for this plan.

Sincerely,



Bruce Rasner
23886 Innisbrook Lane
Laguna Niguel, CA 92677

Cc: Calif. Coastal Commission Staff

COASTAL COMMISSION

EXHIBIT # 7
PAGE 43 OF 151

May 12, 2000

RECEIVED
MAY 16 2000

California Coastal Commission Staff
P.O. Box 1450
200 Oceangate, 10th Floor
Long Beach, California 90802-4416

CALIFORNIA
COASTAL COMMISSION

RE: Treasure Island project, Laguna Beach, CA

Dear Commission Staff:

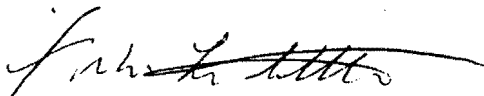
As a resident of Laguna Beach, I have followed the progress of the Treasure Island mobile home redevelopment project with interest. I can see that the project, after several planning and design iterations, has reached a stage that satisfies my concept of a plan that will be an asset for the citizens of Laguna Beach and Orange County.

The project as currently designed allows for public access to a beach that was formerly inaccessible to the public. In addition, the public will have access to a beautiful park that will be filled with works of art and have marvelous views of the ocean which were not available when the property was being used as a mobile home park.

The project management team will be engaged in an environmental protection program which will include five years of underwater monitoring and a public awareness program that will stress marine conservation. Ocean water quality will be ensured by the use of storm drains and catchment systems that will prevent water runoff from the project site to directly enter the ocean.

In closing, I want to stress that as a resident of Laguna Beach I am in favor of this project as it is currently planned and support its immediate commencement.

Very truly yours,



Fredric L. Sattler
132 Chiquita Street
Laguna Beach, CA 92651

COASTAL COMMISSION

EXHIBIT # 7
PAGE 44 OF 151

May 11, 2000

Commissioner Sara Wan
22350 Carbon Mesa Road
Malibu, CA 94105

RECEIVED

MAY 16 2000

CALIFORNIA
COASTAL COMMISSION

Dear Ms Wan:

I have lived in Laguna Beach for almost 30 years, always near the Treasure Island site. Treasure Island has beautiful coves and beaches that have been denied public access for the entire time, hidden behind a tacky fence. I frequent the two beaches on either side of Treasure Island and am excited at the prospect of finally having public access to the beach there. The proposed blufftop park, underground parking, view corridor and beach access are a welcome improvement.

I have studied the development plan and it seems like an ideal combination of public and private use. A five-star hotel will provide the City of Laguna Beach and the Laguna Beach Unified School District with much-needed revenue. It will also provide wonderful banquet facilities that can be used by private parties and local charitable organizations alike.

The development group has worked with the residents and the city to address any and all concerns regarding the proposed project and has made numerous changes through this process. The voters of Laguna Beach approved the project and the city has given its approval. This project will provide Laguna residents beach access where there currently is none, correction of a bluff erosion problem, an increased tax base and needed facilities. The support of the Coastal Commission and timely approval of this project will move it forward and give our community a project of which it can be proud.

Sincerely,



Lee E. Kucera
985 Balboa Avenue
Laguna Beach, CA 92651

cc: California Coastal Commission Staff
P.O. Box 1450
200 Oceangate, 10th Floor
Long Beach, CA 90802-4416

COASTAL COMMISSION

EXHIBIT # 7
PAGE 45 OF 151

John & Linda O'Neill
31567 Catalina Avenue
Laguna Beach, CA 92651

RECEIVED

MAY 16 2000

CALIFORNIA
COASTAL COMMISSION

MAY 11, 2000

TO: THE STAFF

CALIFORNIA COASTAL COMMISSION
P.O. Box 1450

200 OCEANGATE, 10TH FLOOR
LONG BEACH, CA 90802-4416

RE: TREASURE ISLAND
LAGUNA BEACH

DEAR COASTAL COMMISSION:

PLEASE GIVE POSITIVE CONSIDERATION TO BUILDING THE HOTEL AND HOUSING AT THE LAGUNA BEACH SITE CALLED TREASURE ISLAND. THIS OUTSTANDING DESIGN COMBINES THE BEST USE OF THE LAND THAT IS POSSIBLE. IT IS FAR BETTER THAN THE PREVIOUS USE AS A MOBILE HOME PARK, AND MUCH MORE ROBUST THAN MAKING IT A PUBLIC PARK. AFTER ALL, THE DESIGN INCORPORATES A PARK ON THE EDGE OF THE BLUFF, AND THE BEACH ITSELF FUNCTIONS AS A PARK. THE FORMER INCARNATION OF THE PROPERTY AS A TRAILER PARK KEPT THE PUBLIC FROM ACCESSING THIS LOVELY STRETCH OF COASTLINE, BUT THE EXCELLENT PROJECT DESIGN GIVES US MUCH DESIRED ACCESS.

WE FEEL THAT CAREFUL CONSIDERATION HAS BEEN APPLIED TO ALL FACETS OF THIS PROJECT. PLEASE ALLOW IT TO PROCEED TO COMPLETION.

SINCERELY



EXHIBIT # 7
PAGE 46 OF 151

May 15, 2000

Sara Wan, Chair
22350 Carbon Mesa Road
Malibu, CA 94105

RECEIVED
MAY 16 2000
CALIFORNIA
COASTAL COMMISSION

Dear Sara,

I would like to express my support for the Treasure Island Project in Laguna Beach. I have spent some time looking at the project. I think it is beautiful. I can't wait to take runs along the bluffs, take my kids to the tide pools, spend the afternoon lunching with my lady friends at the bluffside restaurant, and spend an overnight with my husband at the hotel.

It is going to be an awesome project! Please approve this project.

I have lived in Laguna since I was 7 years old. I am now 35 years old and have three young children. I can't think of any other use for this land that would be better for my family or the community.

Please approve this project with no further delays.

Very sincerely,



Kelly Kelly
6 North Vista De La Luna
Laguna Beach, CA 92651

cc: Staff
California Coastal Commission
P.O. Box 1450
200 Oceangate 10th Floor
Long Beach, CA 90802-4416

COASTAL COMMISSION

EXHIBIT # 7
PAGE 47 OF 151

May 15, 2000

Debora Lee
C.C. Commission
P.O. Box 1450
200 Ocean Gate, 10th Floor
Long Beach, CA 90802

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MAY 16 2000

CALIFORNIA
COASTAL COMMISSION

Ms Lee:

I am writing to express my support for the plan approved by the city of Laguna Beach for the development project at Treasure Island. As an active and long time member of the Laguna Beach community, I have waited for the redevelopment of this abandoned mobile home site for some time. I urge you to uphold the Treasure Island Local Coastal Program so this plan can move forward.

It is my understanding that you are reviewing a single issue regarding grading of the bluff. After reviewing the project, it appears the developers of the five-star resort and the public park have taken great measures to insure that they preserve and enhance the integrity of the site.

I am impressed with the plan as it now stands, and am anxious for it to move forward. The benefits to the residents of Laguna Beach are tremendous from new public parks, to additional dollars to assist our schools and community, and converting a long considered eyesore on the coast to a beautiful five-star resort.

Please do the right thing when you vote to approve this project.

Thank you in advance for your time.

Sincerely,

Rachel Loper

Rachel Loper

cc: Coastal Commission Staff
California Coastal Commission
200 Oceangate Suite 1000
Long Beach, CA 90802-4416

COASTAL COMMISSION

EXHIBIT # 7
PAGE 48 OF 151

May 14, 2000

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MAY 16 2000

CALIFORNIA
COASTAL COMMISSION

Teresa Henry
California Coastal Commission
P.O. Box 1450
200 Ocean Gate, 10th floor
Long Beach, CA 90802-4416

Dear Ms. Henry:

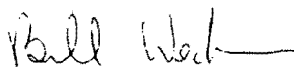
I wish to express my whole hearted support for the Treasure Island plan before you.

My family and I have lived in Laguna Beach for 33 years. I have owned real estate in Laguna Beach for 36 years. I am a Senior Sales Executive with Coldwell Banker and have specialized in sales of Laguna Beach oceanfront property for 24 years. I have been on numerous committees and organizations to support and benefit this beautiful community and I am currently vice president and treasurer of the Laguna Beach High School Football Boosters.

We have an excellent City Council in Laguna Beach; they have wisely approved the plan. Based on my discussions with friends, neighbors and business associates in Laguna Beach I have seen overwhelming support for this project as it stands today.

I hope you will support the Treasure Island Plan in your capacity as staff member of the Coastal Commission. I fully support this Treasure Island Plan.

Respectfully submitted,


Bill Wedmore
716 Gainsborough Place
Laguna Beach, CA 92651
(949) 497-5072

Cc: Shirley Detloff

COASTAL COMMISSION

EXHIBIT # 7
PAGE 49 OF 151

May 16, 2000

California Coastal Commission Staff
Atten: Sara Wan
P.O. Box 1450
200 Ocean Gate, 10th Floor
Long Beach, CA 90802

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MAY 16 2000

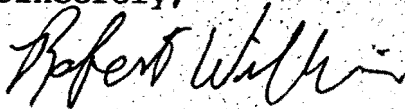
CALIFORNIA
COASTAL COMMISSION

Dear Chairperson Wan,

I am a twenty-two year Laguna Beach resident and would like to express my support for the Treasure Island redevelopment. As a resident of the coastal community I am very concerned for the preservation of and, access to the shoreline that drew me to the area. The current proposed plan for this project has been thoroughly reviewed and approved by the majority of Laguna Beach residents. When this parcel was a trailer park I was not allowed to use this pristine beach.

Please allow this to go forward without delay so that my family, and my neighbors can use this beautiful stretch of coastline that has previously held as private property.

Sincerely,



Bob Williams
1575 Arroyo Drive
Laguna Beach, Ca 92651

CC: Shirley Dettloff

COASTAL COMMISSION

EXHIBIT # 7
PAGE 50 OF 151

May 12, 2000

RECEIVED
MAY 16 2000

CALIFORNIA
COASTAL COMMISSION

California Coastal Commission Staff
P.O. Box 1450
200 Oceangate, 10th Floor
Long Beach, California 90802-4416

RE: Treasure Island project, Laguna Beach, CA

Dear Chair and Boardmembers,

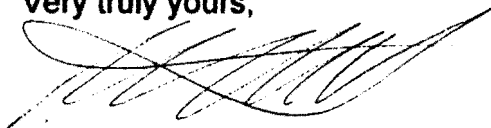
Thank you for your work and review of this project over the past several years. The project has been successfully designed to meet the objectives of the Coastal Commission and the City of Laguna Beach. After literally thousands of hours of time invested by the Commission and the community, the community now has a project that has passed the scrutiny of our elected officials, appointed commissions and the public through a referendum.

I understand that the staff has raised an issue about the grading of the bluff-top. While the review is necessary, I hope that the issue can be addressed efficiently to allow the project to proceed quickly.

I hope you understand the importance of this project to our community. The property has been closed to the public for as long as I can remember. With rising home prices, the site could be readily purchased for a home-site, ending the chance for public access in my life time.

I urge you to finish the approval of the project as quickly as possible to allow it to proceed. Thank you for your time and consideration.

Very truly yours,



Robert E. Dietrich
452 Holly Street
Laguna beach, CA 92651

COASTAL COMMISSION

EXHIBIT # 7
PAGE 51 OF 151

Sara Wan, Chair
45 Fremont Avenue, Ste. 2000
San Francisco, CA 94105-2219

May 11, 2000

RECEIVED

MAY 16 2000

CALIFORNIA
COASTAL COMMISSION

Dear Ms. Wan and Members of the Coastal Commission:

Please go ahead with approval for the Treasure Island project in Laguna Beach! As an active member of the Laguna Beach community I am eagerly awaiting the redevelopment of this abandoned mobile home site.

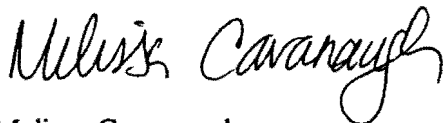
Currently, this site is locked behind gates and of no use to anyone. When redeveloped it will allow the public to enjoy increased public access to the beautiful coastline. I look forward to the day that I can come to Treasure Island with my friends and family.

I understand that you are reviewing a single issue regarding the grading of the bluff. Without this type of grading the park would not be able to exist. I believe that the developers will do an excellent job and assure us a park that will be safe and environmentally stable for years to come.

Please approve the Treasure Island project with no further delay!

Thank you for your attention to this matter.

Sincerely,



Melissa Cavanaugh

CC: Anne Kramer, Deborah Lee and Staff
California Coastal Commission
P.O. Box 1450
200 Oceangate, 10th Floor
Long Beach, CA 90802-4416

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MAY 17 2000

CALIFORNIA
COASTAL COMMISSION

COASTAL COMMISSION

EXHIBIT # 7
PAGE 52 OF 151

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MAY 17 2000

CALIFORNIA
COASTAL COMMISSION

RECEIVED

MAY 16 2000

CALIFORNIA
COASTAL COMMISSION

May 10, 2000

Commissioner Sara Wan, Chairman
California Coastal Commission
45 Fremont Avenue, Suite #2000
San Francisco, CA 94105-2219

Dear Chairperson Wan

After years of debate over how to redevelop the Treasure Island mobile home site, the community and the City have come up with a plan that is respectful of the land and provides the people of California many benefits. The Coastal Commission unanimously approved an LCP two years ago. Since that time the project was approved by a majority of the community in a referendum election and spent nine months in a very thorough entitlement process. Currently, the plan has been refined to include more park space and reduced the number of homes on the site from 37 to 31.

This plan has been thoroughly studied and reviewed. Now it is time to move forward. I urge the Coastal Commission to support the Treasure Island Local Coastal Program and let this plan move forward without further delays.

As a resident of the Laguna Beach community, I thank you for your stewardship of our coastline. Please know that you are doing the right thing in the eyes of this community by voting to allow this plan to move forward.

Sincerely,

Melanie Durkin
Laguna Beach Resident

COASTAL COMMISSION

EXHIBIT # 7
PAGE 53 OF 191

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MAY 17 2000

CALIFORNIA
COASTAL COMMISSION

Linda & John O'Neill
31567 Catalina Avenue
Laguna Beach, CA 92651

RECEIVED

MAY 16 2000

CALIFORNIA
COASTAL COMMISSION

May 11, 2000

Executive Director Peter Douglas
California Coastal Commission
45 Fremont Ave, #2000
San Francisco, California 94105

Dear Director Douglas,

As a resident of Laguna Beach for the last 12 years I have looked with envy at those individuals who were lucky enough to live in the area of Laguna Beach known as Treasure Island. It seemed strange to me that the beautiful stretch of California coast could be the sole property of individuals as a trailer park.

I was very thrilled when the Treasure Island Coastal Program was approved by your Commission.

The idea of opening up the area to the community and visitors from all over the world is a wonderful gift to those of us who live here now and for future generations to come.

Thank you for the care and thought you have given this project. Please, move the project forward. The community has approved the plan by a majority. Laguna wants this resort. Please, help all dream of a world class park ~~resort~~ come true.

COASTAL COMMISSION

PAGE 54 OF 151

May 10, 2000

MAY 16 2000

CALIFORNIA
COASTAL COMMISSION

3076 Mountain View
Laguna Beach, CA
C#2657
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MAY 17 2000

CALIFORNIA
COASTAL COMMISSION

Dear California Coastal Commission Members.

I would like to add my support to the Treasure Island project. I've watched the public process at Laguna City Council and believe it was a fair & thorough process. The city and those of us who live here will be beneficiaries of the development.

I hope you will be able to expedite the process & bring things to a timely conclusion.

Sincerely,

Alan Brinkley

COASTAL COMMISSION

EXHIBIT # 7
PAGE 55 OF 151

~~RECEIVED~~

MAY 16 2000

5-15-00

CALIFORNIA
COASTAL COMMISSION

CALIFORNIA COASTAL COM.

RE. TREASURE ISLAND PROJECT.

BOARD MEMBERS.

OUR FAMILY - RESIDENTS OF LAGUNA BEACH
STRONGLY FAVOR THE TREASURE ISLAND PROJECT
AS APPROVED BY THE LAGUNA BEACH VOTERS
AND BY THE DESIGN REVIEW BOARD & CITY
COUNCIL. WE BELIEVE THE SOUTH LAGUNA
CIVIC ASSN AND VILLAGE LAGUNA PROTESTS
WHILE LEGAL ARE A WASTE OF THE TAXES OF
LAGUNA AND THE STATE OF CALIFORNIA AND
ARE MADE SIMPLY TO DELAY THE PROJECT.

WE URGE YOU TO APPROVE THE PROJECT
AS SUBMITTED.

John A. Hefli
585 DUNNWAY PL LAGUNA BEACH

COASTAL COMMISSION

EXHIBIT # 7
PAGE 56 OF 151

May 10, 2000

Commissioner Sara Wan, Chairman
California Coastal Commission
45 Fremont Avenue, suite #2000
San Francisco, CA 94105-2219

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MAY 17 2000
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COASTAL COMMISSION

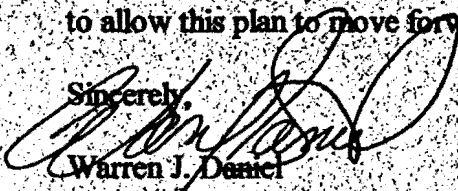
Dear Chairperson Wan

After many years of debate over how to redevelop the Treasure Island mobile home site, the community and the City have come up with a plan that is both respectful of the land and also provides the people of California with many benefits. The Coastal Commission unanimously approved an LCP two years ago! Since that time the project was approved by a majority of the community in a referendum election and spent nine months in a very thorough entitlement process. Currently the plan has been refined to include more park space and reduced the number of homes on the site from 37 to 31.

This plan has been thoroughly studied and reviewed. Now it is time to move forward. I strongly urge the Coastal Commission to support the Treasure Island Local Coastal Program and let this plan move forward without further delays.

As a resident of the community, I thank you for your stewardship of our coastline. Please know that you are doing the right thing in the eyes of this community by voting to allow this plan to move forward without further delays.

Sincerely,


Warren J. Daniel
29 Emerald Glen
Laguna Niguel, CA 92677

Cc: Calif. Coastal Commission Staff

COASTAL COMMISSION

EXHIBIT # 7
PAGE 57 OF 151

RECEIVED

MAY 17 2000

CALIFORNIA
COASTAL COMMISSION

John & Linda O'Neill
31567 Catalina Avenue
Laguna Beach, CA 92651

RECEIVED

MAY 16 2000

CALIFORNIA
COASTAL COMMISSION

May 11, 2000

Commissioner Sara Wan, Chairman
California Coastal Commission
45 Front Street #2000
San Francisco, California 94105-2219

IC Staff CCC

Dear Chairperson Wan,

As a resident of Laguna Beach for the last 12 years I have looked with envy at those people who were lucky enough to live in the area of Laguna Beach known as Treasure Island. It seemed strange to me that this beautiful stretch of land and coastal frontage could be the sole property of individuals in a trailer park.

I was extremely thrilled the Treasure Island Inland Coastal Program was approved by your Commission. The idea of opening up this area to the community and visitors from all over the world is a wonderful gift to those of us who live here now and for the future generations to come.

Thank you for the care and thought you have given to this project. Please, ~~change~~ **COASTAL COMMISSION** to move forward with the plan at this time. Our community has approved the project by ~~majority~~ **UNANIMOUSLY**. Please help us see our dream come true.

May 10, 2000

RECEIVED

MAY 16 2000

CALIFORNIA
COASTAL COMMISSION

3076 Mountain View
Logans Bluffs, CA
92657
RECEIVED
MAY 17 2000

CALIFORNIA
COASTAL COMMISSION

Dear California Coastal Commission Members,

I would like to add my support to the Three Mile Island project. I've watched the public process at Logans City Council and believe it was a fair & thorough process. The city and those of us who live here will be beneficiaries of the development.

I hope you will be able to expedite the process & bring things to a timely conclusion.

Sincerely,

Alan Barkley

COASTAL COMMISSION

EXHIBIT # 7
PAGE 59 OF 151

Valarie and David Whiting

May 12, 2000

Sara Wan, Chair
California Coastal Commission
45 Fremont Ave #2000
San Francisco, Ca 94105-2219

RECEIVED
MAY 17 2000

CALIFORNIA
COASTAL COMMISSION

RECEIVED

MAY 16 2000

CALIFORNIA
COASTAL COMMISSION

RE: Treasure Island Property, Laguna Beach, CA

Dear Chairwoman Wan and Members of the Coastal Commission:

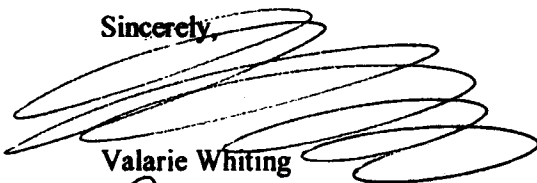
We are writing the Commission urging you to give final approval to the referenced project. This project will provide access to land that has heretofore been unavailable to the public.

For years this land contained a transient trailer park that was built and operated with absolutely no consideration for public access, safety or environmental considerations. As a result, the land needs to be repaired and brought up to today's environmental and safety standards.

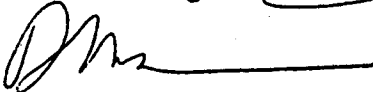
After carefully reviewing the plans proposed by The Athens Group, we are confident that their project as submitted would yield repairs to the damaged bluff, a beautiful PUBLIC park, a much-needed view corridor, a 5-star resort, and substantial economic benefits to the City of Laguna Beach.

As longtime residents of Laguna Beach within one mile of the site, we strongly encourage you to approve the Treasure Island Project without delay. Anything less would be unconscionable.

Sincerely,



Valarie Whiting



David Whiting

Cc:
Staff
California Coastal Commission
PO Box 1450
200 Oceangate, 10 Floor
Long Beach, CA 90802

COASTAL COMMISSION

EXHIBIT # 7
PAGE 60 OF 151

Post Office Box 9456 • Laguna Beach • California 92652

May 10, 2000

Commissioner Sara Wan, Chairman
California Coastal Commission
45 Fremont Avenue, Suite 2000
San Francisco CA 94105-2219

RECEIVED
MAY 16 2000
CALIFORNIA
COASTAL COMMISSION


Dear Chairperson Wan,

After years of debate over how to redevelop the Treasure Island mobile home site, the community and the City have come up with a plan that is the best use of the site and provides to the general public many benefits, not to just a few. The Coastal Community unanimously approved an LCP two years ago. Since that time, the project was approved by a majority of the community in a referendum election and spent nine months in a very thorough entitlement process. Currently, the plan has been refined to include more park space and reduce the number of homes on the site from 37 to 31.

This plan has been thoroughly studied and reviewed. Now it is time to move forward and not waste anymore time. I urge the Coastal Commission to support the Treasure Island Local Coastal Program and let this plan move forward without further delays.

As a business owner of the Laguna Beach community, I thank you for stewardship of our coastline. Please know that you are doing the right thing in the eyes of this community by voting to allow this plan to move forward.

Sincerely,


Jill Richards
President
Port Jackson Fine Art
1550 S. Coast Highway
Laguna Beach

RECEIVED
MAY 17 2000
CALIFORNIA
COASTAL COMMISSION

cc:
PO Box 1450
200 Ocean Gate 10th Fl
Long Beach CA 90802-4416

COASTAL COMMISSION

EXHIBIT # 7
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California Coastal Commission Staff
45 FREMONT AVE, SUITE 2000
San Francisco, CA.

RECEIVED
MAY 17 2000

CALIFORNIA
COASTAL COMMISSION

Dear Staff,

In behalf of many of the residents of Laguna Beach, I am writing to express my support for the plan approved by the City of Laguna Beach for the development of Treasure Island. I grew up in Laguna in the 50's and have seen many things happen. The development planned for Treasure Island is good for everyone.

I really like the plan as it now stands, and am anxious for it move forward. Please do the right thing and get this meeting going.

Very Truly Yours
John Brun

COASTAL COMMISSION

EXHIBIT # 7
PAGE 62 OF 151

May 13, 2000

RECEIVED
MAY 17 2000

CALIFORNIA
COASTAL COMMISSION

Teresa Henry
California Coastal Commission
P.O. 1450
200 Ocean Gate, 10th floor
Long Beach, CA 90802-4416

Dear Ms. Henry:

I am writing to express my very strong support for the Treasure Island Development Project, which has been approved by the city of Laguna Beach.

I have lived with my family in Laguna Beach for more than twenty years. I believe strongly in the ecology and preservation of the Laguna Village concept. I believe this project is in keeping with those precepts.

Laguna Beach is more than a village today. It is a world class city known all over the world for its garret of the art world, its beaches, coves and breathtaking beauty.

The Treasure Island project is one of the best conceived plans to improve Laguna Beach in many a year. Please take our desires seriously and offer your approval for this wonderful project.

Respectfully submitted,



Nancy Wedmore
716 Gainsborough Place
Laguna Beach, CA 92651
(949) 497-5072

Cc: Sara Wan, Chair

COASTAL COMMISSION

EXHIBIT # 7
PAGE 63 OF 151

May 13, 2000

California Coastal Commission
P.O. Box 1450
200 Occangate, 10th Floor
Long Beach, CA 90802-4416

RECEIVED
MAY 17 2000

CALIFORNIA
COASTAL COMMISSION

Dear California Coastal Commission

Please consider the support of this Laguna resident for the redevelopment of Treasure Island. I am a ten-year resident of Laguna, I used to live on the site, and I now live only a mile away. I have paddled countless times past the site. I probably know the site and its coastal resources better than any of the appellants.

The appellants may have raised some issues that need addressing by the Commission. But their motive is not to make the project better, it's to kill the project entirely. Lagunans are relying upon the Commission not to contribute to unnecessary delay, but to approve this project, with any necessary reasonable conditions, and allow the public to enjoy the benefits that this project will afford. As beautiful as this site is, it still has conditions that need correcting. The approval of this project will provide both Laguna residents and coastal visitors better water quality, beach access where there currently is none, and the reduction of bluff erosion. These conditions exist every day that this project is delayed.

This project has the support of the community, voiced by the ratification by Laguna voters of the City Council's approval. Your support and timely approval will move this project forward and give our community a project of which it can be proud.

Sincerely,



James M. Lawson
31652 Scenic Drive
Laguna Beach, CA 92651

cc: Commissioner Sara Wan
California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, CA 94105-2219

COASTAL COMMISSION

EXHIBIT # 7
PAGE 64 OF 151

John Campbell
247 Forest Avenue, Suite A
Laguna Beach, CA 92651

May 15, 2000

Commissioner Shirley Dettloff
California Coastal Commission
City of Huntington Beach
2000 Main Street
Huntington Beach, CA 92648

RECEIVED
MAY 17 2000

CALIFORNIA
COASTAL COMMISSION

Dear Commissioner Dettloff,

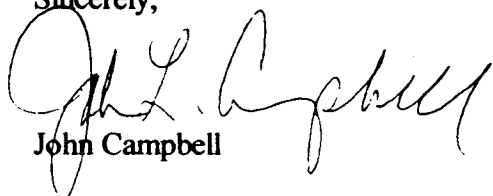
As a businessman in Laguna Beach, I want to ask the California Coastal Commission to give approval to the Treasure Island Redevelopment Plan. This project, with new housing facilities will in my opinion, will substantially increase property values in the community, which will be of major benefit to our city.

I support the plan because of the beneficial economic impact on our community.

I also support the project because it will provide substantial public parkland and access to a beach that has been private property for way too many years.

I ask you to please act in the best interest of the citizens of this community.

Sincerely,



John Campbell

Cc: California Coastal Commission Staff

COASTAL COMMISSION

EXHIBIT # 7
PAGE 65 OF 151

May 15, 2000

Debora Lee
C.C. Commission
P.O. Box 1450
200 Ocean Gate, 10th Floor
Long Beach, CA 90802

RECEIVED
MAY 17 2000
CALIFORNIA
COASTAL COMMISSION

Ms Lee:

I am writing to express my support for the plan approved by the city of Laguna Beach for the development project at Treasure Island. As an active and long time member of the Laguna Beach community, I have waited for the redevelopment of this abandoned mobile home site for some time. I urge you to uphold the Treasure Island Local Coastal Program so this plan can move forward.

It is my understanding that you are reviewing a single issue regarding grading of the bluff. After reviewing the project, it appears the developers of the five-star resort and the public park have taken great measures to insure that they preserve and enhance the integrity of the site.

I am impressed with the plan as it now stands, and am anxious for it to move forward. The benefits to the residents of Laguna Beach are tremendous from new public parks, to additional dollars to assist our schools and community, and converting a long considered eyesore on the coast to a beautiful five-star resort.

Please do the right thing when you vote to approve this project.

Thank you in advance for your time.

Sincerely,

Rachel Loper

Rachel Loper

cc: Coastal Commission Staff
California Coastal Commission
200 Oceangate Suite 1000
Long Beach, CA 90802-4416

COASTAL COMMISSION

7
PAGE 66 OF 151

THE
FRENCH
COMPANY

RECEIVED
MAY 17 2000

May 15, 2000

CALIFORNIA
COASTAL COMMISSION

Mr. Peter Douglass
Executive Director
California Coastal Commission
45 Fremont St., Suite 2000
San Francisco, CA 94105

RE: Treasure Island CDP
Laguna Beach, California

Dear Mr. Douglass,

I have been a resident of Laguna Beach for thirty-five years and during that time have visited the beach below Treasure Island only twice due to the restricted access available. The redevelopment plans for this site, which have been approved by the City of Laguna Beach, will allow my family access to this beautiful coastal resource. The approved plans represent an excellent example of a balance between private enterprise and public access.

As long as appropriate environmental safeguards are taken, particularly as regards urban runoff into the ocean, this project will be a tremendous asset for our community. We urge you to approve the Treasure Island CDP as proposed.

Sincerely,



Peter L. French

D:\Peter\Peter Douglas Letter-051500

COASTAL COMMISSION

May 14, 2000

Sara Wan, Chair
22350 Carbon Mesa Road
Malibu, CA 94105

RECEIVED
MAY 17 2000


CALIFORNIA
COASTAL COMMISSION

Dear Sara,

I would like to express my support for the Treasure Island Project in Laguna Beach. Having been a resident of Laguna Beach since 1970, I have a deep appreciation for the charm and uniqueness of our wonderful City. This project will blend into the surrounding communities in a very natural way. In looking at the environmental impacts from my laymans position, I am confident the long time use as a trailer park had more negative impacts from traffic and run-off than this project will. The opening to the public of the magical coves along this section of the California Coast is awesome. My family and I will enjoy the bluff top park to its fullest extent.

Please approve this project with no further delays.

Very sincerely,



Mark Kelly
6 North Vista De La Luna
Laguna Beach, CA 92651

cc: Staff
California Coastal Commission
P.O. Box 1450
200 OceanGate 10th Floor
Long Beach, CA 90802-4416

COASTAL COMMISSION

EXHIBIT # 7
PAGE 68 OF 151

May 12, 2000

Anne Kramer
California Coastal Commission
P.O. Box 1450
200 Ocean Gate, 10th Floor
Long Beach, CA 90802

RECEIVED
MAY 17 2000

CALIFORNIA
COASTAL COMMISSION

Dear Ms. Kramer:

On behalf of many of my business associates and clients, I am writing you to encourage your support and approval of the Treasure Island Redevelopment Plan. As a business owner in Laguna Beach (not directly involved with tourism or the art world), I fully support the planned use of this very important property.

Quite frankly, I find it very unsettling that the voice of the people has been so weakly heard on this issue. The city is behind this plan and the voters have spoken. The plan clearly addresses the most important environmental issues on our radar screens today; Ocean water quality, urban run-off and the protection of our fragile ocean eco-systems.

This is a responsible and ecologically logical use of the land. The multi-purpose functionality of the structures and facility will greatly support and enhance the quality of life for both business and the people of Southern California.

Thank you for taking the time to read my letter. And thank you for the personal time and effort you take in fulfilling your role as Commissioner.

Warm Regards,

Mark F. Jones
General Manager
The Showpros Group, Inc.
1350 S. Coast Highway 2nd Floor
Laguna Beach, CA 92651
(949) 464-0043

COASTAL COMMISSION

EXHIBIT # 7
PAGE 69 OF 151

Members, California Coastal Commission
45 Fremont Avenue, Suite 2000,
San Francisco, California (94105)

RECEIVED
MAY 17 2000

CALIFORNIA
COASTAL COMMISSION

Dear Members,

I am writing in support of the Athens Group
and their development with the City of Laguna
Beach's approval of the project at Treasure Island.

You previously granted your support. The developer
has expanded public access reduced again the number
of estate lots, agreed to a extensive water management
program, complied with environmental studies and
are prepared to move forward...

The City of Laguna, the residents, school district
and the visiting public will all benefit from this
development. I encourage your swift approval
of your commission... I might add that I'm
a 20 year resident of this community and wish
this development to move forward.

COASTAL COMMISSION

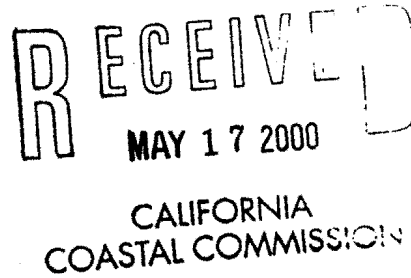
EXHIBIT #

PAGE 151

Paul M. Keenig
2266 Hillview Dr

May 12, 2000

Commissioner Sara Wan, Chairman
California Coastal Commission
45 Fremont Avenue, Suite #2000
San Francisco, CA 94105-2219



Dear Chairperson Wan:

I am writing to express my support for the plan approved by the City of Laguna Beach for the Treasure Island Project. I am an active member of the Laguna Beach community. I live and work in Laguna Beach. I currently serve on the Christopher Reeve Foundation for the Orange County Guild; I am past president of the American Paralysis Association for Orange County.

Please support us this project because it is good for Laguna. The vast majority for our friends and neighbors support the project and believe it will be good for Laguna.

Respectfully submitted,

A handwritten signature in cursive script that reads "Nancy Wedmore".

Nancy Wedmore
716 Gainsborough Place
Laguna Beach, CA 92651

Staff
California Coastal Commission
P.O. Box 1450
200 Oceangate, 10th Floor
Long Beach, CA 90802-4416

COASTAL COMMISSION

EXHIBIT # 7
PAGE 71 OF 151

May 16, 2000

California Coastal Commission
Attn: Peter Douglass, Executive Director
45 Freemont St., Suite 2000
San Francisco, CA 94105

Re: Treasure Island at Laguna Beach

RECEIVED
South Coast Region
MAY 17 2000
CALIFORNIA
COASTAL COMMISSION

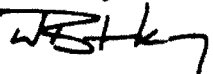
Dear Mr. Douglass:

My wife and I have been frequent visitors to the Laguna Beach area over the years visiting friends and relatives, sailing, diving, and generally enjoying this beautiful area. We were often mystified as to why this property was allowed to fall into such neglect and disrepair when it's potential was so obvious. Frankly, we were also irritated on occasion when we were told we could not walk or jog along the bluff top since it was all private property.

It was a pleasant surprise to learn on our last visit that the Treasure Island development was being planned and, although it is still a private project, we understand much of the area will be opened to the public. From the model and renderings we have seen, it also appears to be a vast improvement over the current eyesore and I'm sure the city of Laguna Beach and residents could use the tax revenue from a prime piece of property that currently returns very little.

I know we are not residents of the area but we do consider ourselves friends of Laguna and would like to voice our support. If the entire property cannot be purchased and developed as a public park, then this type project seems to offer the next best thing that could be expected. Thank you for your time and we hope you will vote in favor of this development.

Sincerely,



William W. Blakeney

Honolulu, Hawaii

Cc: California Coastal Commission Staff

COASTAL COMMISSION

EXHIBIT # 7
PAGE 72 OF 151

May 12, 2000

Anne Kramer
California Coastal Commission
P.O. Box 1450
200 Ocean Gate, 10th Floor
Long Beach, CA 90802

RECEIVED
MAY 19 2000

CALIFORNIA
COASTAL COMMISSION

RECEIVED

MAY 18 2000

CALIFORNIA
COASTAL COMMISSION

Dear Ms. Kramer:

On behalf of many of my business associates and clients, I am writing you to encourage your support and approval of the Treasure Island Redevelopment Plan. As a business owner in Laguna Beach (not directly involved with tourism or the art world), I fully support the planned use of this very important property.

Quite frankly, I find it very unsettling that the voice of the people has been so weakly heard on this issue. The city is behind this plan and the voters have spoken. The plan clearly addresses the most important environmental issues on our radar screens today; Ocean water quality, urban run-off and the protection of our fragile ocean eco-systems.

This is a responsible and ecologically logical use of the land. The multi-purpose functionality of the structures and facility will greatly support and enhance the quality of life for both business and the people of Southern California.

Thank you for taking the time to read my letter. And thank you for the personal time and effort you take in fulfilling your role as Commissioner.

Warm Regards,

Mark F. Jones
General Manager
The Showpros Group, Inc.
1350 S. Coast Highway 2nd Floor
Laguna Beach, CA 92651
(949) 464-0043

COASTAL COMMISSION

EXHIBIT # 7
PAGE 73 OF 151

THE
FRENCH
COMPANY

RECEIVED

RECEIVED
MAY 19 2000

MAY 18 2000

CALIFORNIA
COASTAL COMMISSION

CALIFORNIA
COASTAL COMMISSION

May 15, 2000

Mr. Peter Douglass
Executive Director
California Coastal Commission
45 Fremont St., Suite 2000
San Francisco, CA 94105

RE: Treasure Island CDP
Laguna Beach, California

Dear Mr. Douglass,

I have been a resident of Laguna Beach for thirty-five years and during that time have visited the beach below Treasure Island only twice due to the restricted access available. The redevelopment plans for this site, which have been approved by the City of Laguna Beach, will allow my family access to this beautiful coastal resource. The approved plans represent an excellent example of a balance between private enterprise and public access.

As long as appropriate environmental safeguards are taken, particularly as regards urban runoff into the ocean, this project will be a tremendous asset for our community. We urge you to approve the Treasure Island CDP as proposed.

Sincerely,



Peter L. French

D:\Peter\Peter Douglas Letter-051500

COASTAL COMMISSION

Sara Wan, Chair
California Coastal Commission
45 Fremont Avenue, Ste. 2000
San Francisco, CA 94105-2219

RECEIVED
MAY 23 2000
CALIFORNIA
COASTAL COMMISSION

RECEIVED
MAY 24 2000
CALIFORNIA
COASTAL COMMISSION

Chairwoman Wan and Members of the Coastal Commission:

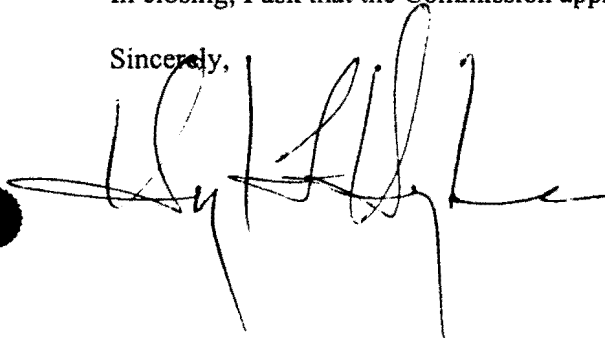
On behalf of many of the residents of Laguna Beach, I am writing to encourage the commission to give final approval to the Treasure Island Redevelopment Plan. The project will provide substantial public parkland and access to a previously private beach. Without your support we risk losing those benefits.

As you know, this project was before your commission in 1998 and was approved 10-1 vote. I am surprised that a plan that offers so much public access, environmental protection and ocean-view parkland should need further review.

It appears to me that the City and the Athens Group have acted in good faith throughout this process, and now the time has come to approve their plan so that the residents can begin to realize the public benefits we have waited for so long to receive. Beyond that consideration, I want to see this beautiful new project with a Five-Star resort and landscaped parks in our community right away.

In closing, I ask that the Commission approve this important new asset to our region.

Sincerely,



COASTAL COMMISSION

EXHIBIT # 7
PAGE 75 OF 151

May 19, 2000

Long Beach
RECEIVED
MAY 19 2000

Commissioner Sara Wan, Chairman
California Coastal Commission
45 Fremont Avenue, Suite #2000 San Francisco, CA 94105-2219

CALIFORNIA
COASTAL COMMISSION

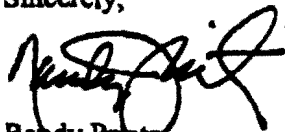
Dear Chairperson Wan:

I am writing in support of the proposed resort/park development plan for the Treasure Island mobile home site in Laguna Beach. After years of debate over how to redevelop that site, the community and the City have come up with a plan that respects the land and provides the people of California many benefits. As you know, the plan was unanimously approved by the Coastal Commission two years ago and has been approved by a majority of the community at the ballot box.

The planned development has been thoroughly studied and reviewed. Now it is time to move forward. I urge the Coastal Commission to support the Treasure Island Local Coastal Program and let this plan move forward without further delays.

As a Californian who values our beautiful coastline, I thank you for your stewardship of this incomparable asset. Please know that you are doing the right thing by voting to allow this plan to move forward.

Sincerely,



Randy Prata

RECEIVED
MAY 22 2000
CALIFORNIA
COASTAL COMMISSION

COASTAL COMMISSION

EXHIBIT # 7
PAGE 76 OF 151

Beach
RECEIVED
MAY 8 2000

RECEIVED

MAY 19 2000

CALIFORNIA
COASTAL COMMISSION

May 19, 2000

Sara Wan, Chair
California Coastal Commission
45 Fremont Avenue, Ste. 2000
San Francisco, CA 94105-2219

CALIFORNIA
COASTAL COMMISSION

Chairwoman Wan and Members of the Coastal Commission:

On behalf of many of the residents of Laguna Beach, I am writing to encourage the commission to give final approval to the Treasure Island Redevelopment Plan. The project will provide substantial public parkland and access to a previously private beach. Without your support we risk losing those benefits.

As you know, this project was before your commission in 1998 and was approved 10-1 vote. I am surprised that a plan that offers so much public access, environmental protection and ocean-view parkland would need further review.

It appears to me that the City and the Athens Group have acted in good faith throughout this process, and now the time has come to approve their plan so that the residents can begin to realize the public benefits we have waited for so long to receive. Beyond that consideration, I want to see this beautiful new project with a Five-Star resort and landscaped parks in our community right away.

In closing, I ask that the Commission approve this important new asset to our region.

Sincerely,

Jeff Mutch
Jeff Mutch

COASTAL COMMISSION

EXHIBIT # 7
PAGE 77 OF 151

May 16, 2000

Members, California Coastal Commission
45 Fremont Avenue, Suite 2000
San Francisco, CA 94105-2219

RECEIVED
MAY 19 2000
CALIFORNIA
COASTAL COMMISSION
MAY 19 2000
CALIFORNIA
COASTAL COMMISSION

Dear California Coastal Commission members:

I am writing to express my support for the plan approved by the City of Laguna Beach for the development project at Treasure Island. As an active and long-time member of the Laguna Beach community, I have waited for the redevelopment of this abandoned mobile home site. I urge you to uphold the Treasure Island Local Coastal Program so this plan can move forward.

It is my understanding that you are reviewing a single issue regarding grading of the bluff. It seems apparent to me that the developers of the five-star resort *and of a public park* will take care to do this right. I am sure they want it not only safe, but aesthetically pleasing as the rest of us would like to see it.

I really like the plan as it now stands, and am anxious for it to move forward. The residents of California have waited long enough for the public benefits this project will bring when it is completed: the access to a fantastic beach, new public parks, the Coast Highway view corridors, a five-star resort and significant economic benefits for our City and our schools.

Please do the right thing when you vote on this project and approve it once and for all. I believe that in fairness to the developer and the residents of Laguna Beach you must support it and allow us to finally acquire the benefits the project will provide.

Thank you for letting me share my thoughts with you.

Very truly yours,



Albert Murillo

COASTAL COMMISSION

EXHIBIT # 7
PAGE 78 OF 151

RECEIVED
MAY 22 2000

Stan Ross
Retired Vice Chairman,
E&Y Kenneth Leventhal
Real Estate Group
Special Consultant

May 19, 2000

CALIFORNIA
COASTAL COMMISSION

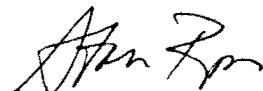
California Coastal Commission Staff
Box 1450
200 Ocean Gate, 10th Floor
Long Beach, CA 90802-4416

re: Treasure Island Resort

To Whom It May Concern:

I am writing to contribute my support of the City of Laguna Beach and previous California Coastal Commission approvals. As a long time resident of Southern California, and an active member of the real estate industry, I support the redevelopment plans for increased public access, a public bluff top park and a five-star resort community. In addition, I would like to see the Coastal Commission approve the Treasure Island Coastal Development Permit as proposed by The Athens Group and approved by the City of Laguna Beach.

Very truly yours,


Stan Ross

/ctl

COASTAL COMMISSION

Jocelyn S. Cushman
411 Arroyo Chico
Laguna Beach, California 92651
May 11, 2000

RECEIVED
MAY 22 2000

CALIFORNIA
COASTAL COMMISSION

Re: The Treasure Island Plan that we as citizens approved in a recent election.

Anne Kramer
California Coastal Commission
P.O. Box 1450
200 Ocean Gate, 10th Floor
Long Beach, CA 90802 - 4416

Dear Anne Kramer,

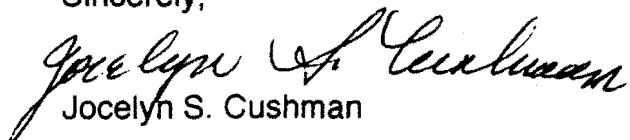
So very sorry that a letter has to act in place of my actual being there to support your previous approval of the Treasure Island Coastal Development Permit on behalf of the majority of citizens of Laguna Beach.

No games. we love the project and see it as an absolute enhancement for the City of Laguna Beach!!! This tearing at the fiber of the project by a small determined group wishing to shred the future of this region for some unknown reasons other than self importance has the majority of us rather tired of their actions. Years and years of planning have gone into this project. . . with far reaching improvements for this area. . . not only for the handicapped. the young who wish to go to the beach. . . the teenagers who will be able to hold their prom in a beautiful location. . . and the aging like myself who finds it so very difficult to get to the beach when a medical problem exists. **Please consider all of us when approving the plan as it stands.** This is the future that we as citizens voted for knowing what it represented with full knowledge and satisfaction in all aspects.

Having lived in Laguna for over 35 years. . . I have walked the beaches thousands of times and know what damage a storm can do to undermine the natural banks and drainage areas. It is with full understanding that I find the Athens Group plan in full conformity towards trying to save the beauty of the area as well as being practicable and educated on how best to preserve that what nature has left in our care. This plan protects this area's future. Approve it as it stands! No more games. . . enough is enough!! We wish to see the Athens plan underway as soon as possible!!!

Thank you for the time you spend on the Coastal Commission representing the majority of us. It is deeply appreciated.

Sincerely,

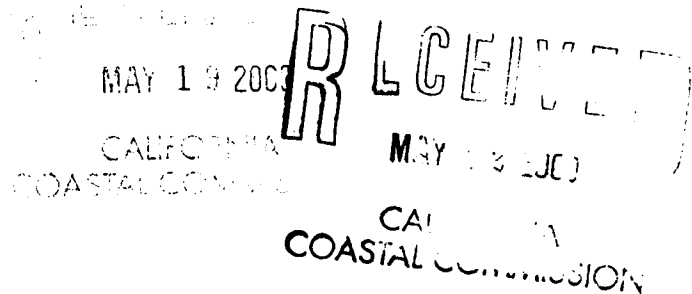

Jocelyn S. Cushman

COASTAL COMMISSION

EXHIBIT # 7
PAGE 80 OF 151

May 16, 2000

Members, California Coastal Commission
45 Fremont Avenue, Suite 2000
San Francisco, CA 94105-2219



Dear California Coastal Commission members:

I am writing to express my support for the plan approved by the City of Laguna Beach for the development project at Treasure Island. As an active and long-time member of the Laguna Beach community, I have waited for the redevelopment of this abandoned mobile home site. I urge you to uphold the Treasure Island Local Coastal Program so this plan can move forward.

It is my understanding that you are reviewing a single issue regarding grading of the bluff. It seems apparent to me that the developers of the five-star resort *and of a public park* will take care to do this right. I am sure they want it not only safe, but aesthetically pleasing as the rest of us would like to see it.

I really like the plan as it now stands, and am anxious for it to move forward. The residents of California have waited long enough for the public benefits this project will bring when it is completed: the access to a fantastic beach, new public parks, the Coast Highway view corridors, a five-star resort and significant economic benefits for our City and our schools.

Please do the right thing when you vote on this project and approve it once and for all. I believe that in fairness to the developer and the residents of Laguna Beach you must support it and allow us to finally acquire the benefits the project will provide.

Thank you for letting me share my thoughts with you.

Very truly yours,

A handwritten signature in cursive script that reads "Albert Murillo".

Albert Murillo

CALIFORNIA COASTAL COMMISSION

EXHIBIT # 7
PAGE 81 OF 151

May 16, 2000

Members, California Coastal Commission
45 Fremont Avenue, Suite 2000
San Francisco, CA 94105-2219

MAY 1 2000
RECEIVED
MAY 28 2000
CALIFORNIA
COASTAL COMMISSION

Dear California Coastal Commission members:

I am writing to express my support for the plan approved by the City of Laguna Beach for the development project at Treasure Island. As an active and long-time member of the Laguna Beach community, I have waited for the redevelopment of this abandoned mobile home site. I urge you to uphold the Treasure Island Local Coastal Program so this plan can move forward.

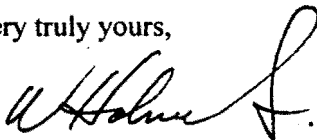
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Please do the right thing when you vote on this project and approve it once and for all. I believe that in fairness to the developer and the residents of Laguna Beach you must support it and allow us to finally acquire the benefits the project will provide.

Thank you for letting me share my thoughts with you.

Very truly yours,



Bill Holmes

COASTAL COMMISSION

EXHIBIT # 7
PAGE 82 OF 151

**WELLS
FARGO**

RECEIVED

RECEIVED
MAY 19 2000
CALIFORNIA
COASTAL COMMISSION
MAY 22 2000

May 12, 2000

**CALIFORNIA
COASTAL COMMISSION**

Peter Douglass, Executive Director
California Coastal Commission
45 Fremont Street, Ste 2000
San Francisco, CA 94105

Dear Mr. Douglass:

This letter is in support of the proposed Treasure Island CDP which is being presented by the Athens Group and approved by the City of Laguna Beach.

I have been involved with the lengthy process for several years and did testify at the 1998 hearings in support of the general project which the Coastal Commissioners approved in concept. My position as President of the Laguna Beach Chamber of Commerce was to support the project for the good of both residents and business owners.

I would never support a project such as this, however, without a personal commitment to doing the right thing. What they are proposing to do is the right thing, in my opinion. When you visit the site, and see the problems, you can also see the possibilities. This beautiful spot will someday host people of all ages and positions and will be a credit to the community and to the people who worked so hard to make it a reality.

Thank you for taking the time to seek opinions.

Sincerely,



Bonnie L. Rohrer
Vice President

Immediate Past President, Laguna Beach Chamber of Commerce

CALIFORNIA COASTAL COMMISSION

cc: Coastal Commission Staff

EXHIBIT # 7
PAGE 83 OF 151

William W. Blackburn
5 South Vista de la Luna
Laguna Beach, CA 92651
(949) 499-4672

RECEIVED
MAY 22 2000

CALIFORNIA
COASTAL COMMISSION

RECEIVED

MAY 19 2000

CALIFORNIA
COASTAL COMMISSION

May 15, 2000

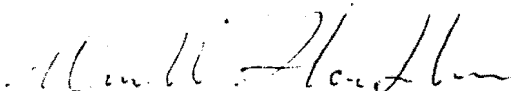
Members, California Coastal Commission
45 Fremont Avenue, Suite 2000
San Francisco, CA 94105-2219

Dear California Coastal Commission members:

As an active and long-time member of the Laguna Beach community, I am writing to express my support of the Treasure Island Redevelopment Plan. For more than 30 years many others and I have been unable to enjoy this beautiful beach and surrounding area. Now we are close to being able to enjoy all of this area. As you no doubt know, opening this area to public access has been a long and tedious process for all of us in Laguna Beach. For nearly eight years the City of Laguna Beach Planning Commission, Design Review Board and City Council have held countless public hearings to arrive at a project that will benefit so many people. The project has received overwhelming public support at all levels of the approval process including an overwhelming majority approval in a referendum election. It appears to me that the City and the Athens Group have acted in good faith throughout the entire planning and approval process. I urge the Coastal Commission to support the Treasure Island Local Coastal Program and to let this plan move forward without further delays.

Having lived and surfed in this area for more than fifty years, I look forward to more open beaches that everyone can enjoy as I have. Please let this project move forward so that more people can experience this beautiful area; everyone will benefit.

Yours truly,



William W. Blackburn

COASTAL COMMISSION

EX-110-7
PAGE 84 OF 151



Christine Kehoe
City of San Diego
202 "C" Street
San Diego, CA 92101

RECEIVED
South Coast Region

MAY 26 2000

CALIFORNIA
COASTAL COMMISSION

Subject: Treasure Island Resort, Laguna Beach, Ca.

Dear Ms. Kehoe,

At the June hearing in Santa Barbara, the Resort comes before on appeal. As an architect and resident of the City for thirty years, I have had the honor of assisting the Athens group in their efforts to design and obtain approvals for this incredible project.

The project before you is a culmination of efforts on the part of a seasoned and committed developer along with a team of talented and experienced consultants.

I have personally participated and assisted in the design efforts and attended virtually each and every governmental agency hearing as well as meetings with affected neighbors. I have watched and affected the evolutionary process of design over a long period with the end result as presented to you.

Not only am I very proud to have been a part of the process, my belief is as a citizen that the public benefits to the habitants of the City as well as the surrounding areas are many and varied. The approved project goes well beyond the minimum requirements in an attempt to insure that the project will be a success and an enhancement to all our lives.

I urge you to carefully review the elements of the project and find that the project as designed satisfies in the Coastal Act in every respect and that the basis for the appeal has no merit.

Should you have any questions, please feel free to contact me.

Respectfully,

Morris Skenderian, A.I.A. Architect

Encl: List of project public benefits

CC: Coastal Commission Staff
Athens Group, John Mansour

2094 S. Coast Highway
Laguna Beach, CA 92651
Tel.: 949-497-3374
Fax: 949-497-9814

7
PAGE 86 OF 151

FROM: James G. Law

TO: CALIF. COASTAL COMMISSION

SUBJ: LAGUNA BEACH - TREASURE ISLAND CDP.

I wish to go on record of total
SUPPORT for the Treasure Island CDP.

I urge your APPROVAL of this project

Sincerely

James G. Law

RECEIVED
South Coast Region
MAY 26 2000
CALIFORNIA
COASTAL COMMISSION

COASTAL COMMISSION

EXHIBIT # 7
PAGE 87 OF 191

California Coastal Commission Staff
200 Ocean Gate, 10th Floor
Long Beach, CA 90802

RECEIVED
South Coast Region
MAY 26 2000
CALIFORNIA
COASTAL COMMISSION

Attention: Sara Wan – Chair Person

Project: Treasure Island Resort
Laguna Beach, California

Subject: Reaffirmation of the California Coastal Commission's approval of this project in order to allow public use of the park and beach area's without further delay's caused by special interest groups.

I have been a resident of California for 25 years during which I have admired the accomplishments of the Coastal Commission on everyone's behalf.

My family and I have enjoyed Aliso Creek and Aliso Beach immensely. We have eagerly looked forward to the addition of the Treasure Island parcel to North Aliso Beach. This previously private land will add over fourteen acres of park land and beaches for public use. It will provide four additional access points from coast highway and dedicate seventy new public parking spaces to further enable us all to enjoy the area's splendor.

The development will incorporate an extensive water quality management program which will clean up the urban run off from the blighted trailer park now there. This in turn will improve the water quality in an area highly impacted by the flows from Aliso Creek.

The addition of a marine preserve will insure the abundant life found in the rock outcroppings, tidal pools and the kelp beds off shore will be there for future generations to enjoy.

The question now is will we have to wait generations for this to take place. This well conceived carefully planned project approved by the City of Laguna Beach and the Coastal Commission continues to be denied the public by some overzealous self centered group with an agenda designed to tie this project up for years if not decades.

We appeal to you for your assistance in reaffirming your prior approval of the purposed project in order to provide these parks and beaches for everyone's enjoyment before yet another decade passes with the public denied the use of these area's.

Conrad Lorbiecki
20022 Trabuco Oaks Drive
P.O. Box 810
Trabuco Canyon, California 92678

cc: California Coastal Commission Staff

COASTAL COMMISSION

EXHIBIT # 7
PAGE 88 OF 151



OMB ELECTRICAL ENGINEERS, INC.

Jeffrey C. Overmyer
Dennis E. McVay
Roy L. Lopez

Electrical Engineers & Lighting Consultants

May 19, 2000

Ms. Shirley S. Dettloff, Commissioner
California Coastal Commission
City of Huntington Beach
2000 Main Street
Huntington Beach, CA 92648

RECEIVED
South Coast Region
MAY 26 2000
CALIFORNIA
COASTAL COMMISSION

Re: **Treasure Island CDP / Laguna beach Resort**

To Whom It May Concern:

I write this letter not as a consultant or pro development businessman, but as a Southern Californian resident, husband and father.

I ask that you approve the Treasure Island CDP as proposed by The Athens Group and approved by the City of Laguna Beach. Current public access to beaches in this beautiful Southern California region is limited at best. This re-development plan calls for increase public access to beaches, as well as, a public bluff-top park that overlooks the Pacific Ocean. We hope that you will allow The Athens Group the ability to grade this bluff in order to create a safe and stable condition.

In closing, we need this project and the additional access to enjoy the ocean. Please approve Treasure Island CDP.

Sincerely,

Dennis E. McVay
Principal

cc: **California Coastal Commission Staff**
P.O. Box 1450
200 Ocean Gate, 10th Floor
Long Beach, CA 90802-4416

DEM:ckn
treasureisland.ttr

COASTAL COMMISSION

EXHIBIT # 7
PAGE 89 OF 151

RECEIVED
South Coast Region

MAY 26 2000

Mary Kay Kubota
5560 Via Ontiveros
Yorba Linda, CA
92887

CALIFORNIA
COASTAL COMMISSION
Anne Kramer
California Coastal Commission Staff
200 Oceangate
Suite 1000
Long Beach, CA 90802-4302

Dear Ms. Kramer:

Please approve the Treasure Island Resort project. I have lived in California for 34 years, and I visit Laguna Beach often. Every summer, my family and I rent a trailer at the El Morro Trailer Park in the north end of Laguna. I mention this because I have no objection to trailer parks. However, this site is a dilapidated, closed trailer park with a locked gate, an ugly fence along Coast Highway, and a private beach.

This project has been approved by every Board that has examined it and by the citizens of Laguna Beach. It has been dissected enough times for you to be very comfortable about the quality of its design, purpose, and public response.

We need the parks and open spaces this project provides. And we need a beach with access for everyone, handicapped and small children alike. The resort will be an asset to the entire California coast; it will help the economics of not just Laguna Beach but the surrounding communities well. Visitors from all over the world as well as us "locals" will be able to visit this beautiful site

This is exactly the type of project the Coastal Commission needs to support: public access, a public park and beaches, a tasteful resort, and a lovely small residential community.

Sincerely,


Mary Kay Kubota

COASTAL COMMISSION

EXHIBIT # 7
PAGE 90 OF 151

Kathy Lamb
21825 Heatherwood Lane
Yorba Linda 92887

RECEIVED
South Coast Region

MAY 26 2000

CALIFORNIA
COASTAL COMMISSION

Anne Kramer
California Coastal Commission Staff
200 Oceangate
Suite 1000
Long Beach, CA 90802-4302

Dear Ms. Kramer:

I am writing in support of the proposed development at the Treasure Island site in Laguna Beach. As a third generation southern Californian, I have seen many changes in the character of the precious coastline. I was very pleased when the Coastal Commission was formed to safeguard this incomparable natural asset.

I strongly urge you to approve the project for this site as previously approved by you and as approved by the Laguna Beach City Council, the Laguna Beach Planning Commission, and the Laguna Beach Design Review Board. Quite significantly, even the voters endorsed this project in a community referendum a year ago. It is rare that the electorate becomes as educated on a proposed development as the voters in Laguna Beach did. With all the inspection of this project, the people and their elected officials have spoken.

Please allow all Californians to enjoy access to this gorgeous site. I hope you will recognize the many benefits this project will bring. Personally, I look forward to the day I can bring my handicapped mother and my small grandchildren to this lovely beach. I also look forward to staying in the resort and enjoying the serenity that only such a fine project can provide.

I support your efforts to safeguard this site, and I hope you, in turn, will continue your support of this quality project.

Sincerely,



Kathy Lamb

COASTAL COMMISSION

EXHIBIT # 7
PAGE 91 OF 151

SUZAN L. CHAUVEL
444 Alta Vista Way
Laguna Beach, CA. 92651

RECEIVED
South Coast Region

MAY 26 2000

CALIFORNIA
COASTAL COMMISSION

May 19, 2000

Sara Wan, Chair
California Coastal Commission
22350 Carbon Mesa Road
Malibu, CA. 90265

Dear Chairperson Wan:

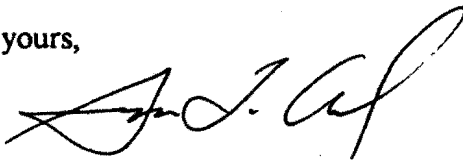
I am a 13 year resident of Laguna Beach. I urge you to continue to support the Treasure Island CDP as proposed by the Athens Group and approved by the City of Laguna Beach.

I urge you to support the City of Laguna Beach and previous California Coastal Commission approvals for Treasure Island. The redevelopment plans are realistic and provide for much-needed public access to the beach, a new public park at the bluff top and a 5 star resort community.

The CDP has already been approved by the City of Laguna Beach. It is a well conceived and highly anticipated redevelopment of the current run down trailer court that occupies such a wonderful piece of California coast. The trailer court remains an eyesore and blight on our community. Only the privileged few who could afford the high rent to keep a trailer in there could have access to the bluff and beautiful beach. The people who had trailers in Treasure Island did nothing to protect the bluff or the coast.

Please approve the Treasure Island CDP for the future of Laguna Beach and the citizens of California.

Very truly yours,



Suzan L. Chauvel

CC: Coastal Commission Staff

COASTAL COMMISSION

EXHIBIT # 7
PAGE 92 OF 151

Amy Corsinita
293 Duranzo Aisle
Irvine, CA 92606

May 19, 2000

Commissioner Sara Wan, Chairman
California Coastal Commission
45 Fremont Avenue, Suite #2000
San Francisco, CA 94105-2219

RECEIVED
South Coast Region
MAY 26 2000
CALIFORNIA
COASTAL COMMISSION

Dear Commissioner Wan:

I am writing to you because I care about the City of Laguna Beach and support the proposed plan by the Athens Group to improve the old Treasure Island site. As a frequent visitor to my grandparent's home in the area, I wanted to voice my thoughts, and theirs on the state of the old mobile home park.

The battle has been going on long enough and I can't believe how long it takes to approve the great plan for the proposed bluff top resort. For so long we have looked out at this empty piece of land (with vacated old trailers) that allows no public beach access. It would be nice to finally see the site put to good use.

I truly hope this time you will pass this project for the betterment of the City of Laguna Beach. It is a valid plan.

Sincerely,


Amy Corsinita

Cc: California Coastal Commission

COASTAL COMMISSION

EXHIBIT # 7
PAGE 93 OF 151

May 19, 2000

Ms. Sara Wan
Chair
California Coastal Commission
22350 Carbon Mesa Road
Malibu, CA
90265

RECEIVED
South Coast Region
MAY 26 2000
CALIFORNIA
COASTAL COMMISSION

Re: City of Laguna Beach – Treasure Island Coastal Development Permit

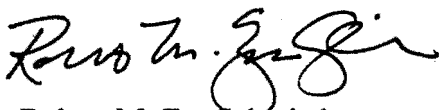
Dear Ms. Wan:

I am writing to you to express my support for the proposed Treasure Island Resort Coastal Development Permit which will be before the Commission on June 13, 14, or 15th in Santa Barbara. This project will serve to benefit the City of Laguna Beach in many ways and is truly a model of how development can be built in environmentally sensitive areas like Laguna. I serve as a member of the City's Design Review Board. In that position, it has been my privilege to review and vote in favor of a number of aspects of this project as it wound its way through the City entitlement approval process.

At the public hearing, the developer will enumerate the many features and benefits of the development so I will not repeat them here. I will rely on your thoughtful consideration of the description of the project and the testimony which you will receive in Santa Barbara. I am certain that you and your fellow Commissioners will agree that this development should be approved, and pointed to as a example of how projects of this type should be pursued in sensitive coastal areas.

Thank you for your time in considering my voice of support.

Sincerely,



Robert M. Zur Schmiede
515 Oak Street
Laguna Beach, Ca
92651

cc: Coastal Commission staff

COASTAL COMMISSION

EXHIBIT # 7
PAGE 94 OF 151

Jacque and Philip Schrock
31422 Alta Loma
Laguna Beach, Ca 92651
949-499-4365
schrockpi@cs.com

RECEIVED
South Coast Region

MAY 26 2000

CALIFORNIA
COASTAL COMMISSION

May 19, 2000

California Coastal Commission
22350 Carbon Mesa Road
Malibu, Ca. 90265

Re: Treasure Island, Laguna Beach

We reside in South Laguna Beach near Treasure Island, and have carefully followed the proposed plans for the development of this special area.

We wish to communicate to you our full whole hearted support for the specific plan that has been proposed by the Athens Group, and approved by the City of Laguna Beach. We support your previous actions in this matter, and encourage you to approve the Athens Group plan.

This development is an exciting opportunity for the residents of this community to finally be able to access one of the most naturally beautiful areas in our city. For the public to have access to a park, areas for strolling, and the use of a five star resort community is a welcome turn of events after looking at trailers as we drive along Coast Highway for these past many years.

Thank you for your past support, and please move forward to approve the Treasure Island Coastal Development Permit.

Sincerely,


Philip and Jacques Schrock

cc: Coastal Commission Staff

COASTAL COMMISSION

EXHIBIT # 7
PAGE 95 OF 151

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South Coast Region

MAY 26 2000

CALIFORNIA
COASTAL COMMISSION

Jill Kanzler
1912 Irvine Avenue
Newport Beach, CA 92660
(949) 646-3532

May 16, 2000

Sara Wan, Chair
California Coastal Commission
22350 Carbon Mesa Road
Malibu, CA 90265

Dear Ms. Wan and Members of the Coastal Commission:

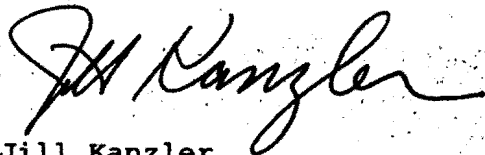
Please move forward with approval for the Treasure Island project in Laguna Beach. As a resident of Newport Beach who visits Laguna often, I am eagerly awaiting the redevelopment of this abandoned mobile home site into a wonderful new beach, public park and resort.

Currently, this site is locked behind gates and we are unable to visit this spectacular beach. We can only access it through Aliso Beach. When Treasure Island is redeveloped it will allow the public to enjoy increased public access to the beautiful coastline. I look forward to the day that I can come to Treasure Island with my friends and family.

I understand that you are reviewing a single issue regarding the grading of the bluff. Without this type of grading the large blufftop park would not be able to exist. I believe that the developers will do an excellent job and assure us a park that will be safe and environmentally stable for years to come.

Please approve the Treasure Island project with no further delay! Thank you for your consideration this place will be beautiful if you'll just vote to let it move forward.

Sincerely,



Jill Kanzler

cc: Coastal Commission Staff

COASTAL COMMISSION

EXHIBIT # 7
PAGE 96 OF 151



LAGUNA BEACH *Chamber of Commerce*

357 Glenneyre • Laguna Beach, CA 92651 • (949) 494-1018 Ext. 5 • FAX (949) 376-8916

RECEIVED
MAY 22 2000

CALIFORNIA
COASTAL COMMISSION

May 17, 2000

California Coastal Commission
P.O. Box 1450
200 Ocean Gate, 10th Floor
Long Beach, CA 90802-4416

Dear Commissioners:

The Laguna Beach Chamber of Commerce, representing over 1,700 licensed local businesses, joins with the City of Laguna Beach in encouraging you to accept the Athens Group Treasure Island Coastal Development Permit (CDP) as previously approved by California Coastal Commission.

The redevelopment plans for increased public access, a public bluff-top park and five star resort community have been thoroughly studied and the conclusion has been reached that this project is sound, not only for the City of Laguna Beach but its citizenry, who will benefit as well. The overall quality of this project will have a long-lasting positive impact on this community as a whole and we are pleased to be able to support it.

Sincerely,

John R. Ellis, Ed.D.
Executive Director

COASTAL COMMISSION

SHOP, DINE, STAY in Laguna Beach

EXHIBIT # 7
PAGE 97 OF 151

May 16, 2000

Members, California Coastal Commission
45 Fremont Avenue, Suite 2000
San Francisco, CA 94105-2219

RECEIVED
MAY 13 2000
CALIFORNIA
COASTAL COMMISSION

Dear California Coastal Commission members:

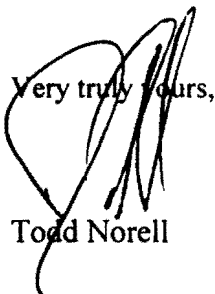
I am writing to express my support for the plan approved by the City of Laguna Beach for the development project at Treasure Island. As an active and long-time member of the Laguna Beach community, I have waited for the redevelopment of this abandoned mobile home site. I urge you to uphold the Treasure Island Local Coastal Program so this plan can move forward.

It is my understanding that you are reviewing a single issue regarding grading of the bluff. It seems apparent to me that the developers of the five-star resort *and of a public park* will take care to do this right. I am sure they want it not only safe, but aesthetically pleasing as the rest of us would like to see it.

I really like the plan as it now stands, and am anxious for it to move forward. The residents of California have waited long enough for the public benefits this project will bring when it is completed: the access to a fantastic beach, new public parks, the Coast Highway view corridors, a five-star resort and significant economic benefits for our City and our schools.

Please do the right thing when you vote on this project and approve it once and for all. I believe that in fairness to the developer and the residents of Laguna Beach you must support it and allow us to finally acquire the benefits the project will provide.

Thank you for letting me share my thoughts with you.

Very truly yours,

Todd Norell

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MAY 22 2000
COASTAL COMMISSION

COASTAL COMMISSION

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PAGE 98 OF 151



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MAY 23 2000

CALIFORNIA
COASTAL COMMISSION

May 18, 2000

Peter Douglass, Executive Director
California Coastal Commission
45 Fremont Street, Ste. 2000
San Francisco, CA 94105

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MAY 22 2000

CALIFORNIA
COASTAL COMMISSION

Dear Sir:

As a two term City Council Member in Laguna Beach I am concerned about the possibility of additional delays in the Treasure Island project. This project has had strong public support. This support has come not only from the City Council, but school board members, and representatives of the Chamber of Commerce, Visitors Bureau, and other local organizations.

We have had two special elections over a ten year period and both have supported moving ahead. I am asking that you support the previous council decisions as well as the 10 to 1 approval from the Coastal Commission last year and help to keep this project on track.

This property, with it's incredible beaches, has been closed to the public for to long. The water runoff from Coast Highway is unacceptable. These issues and many more will all be corrected with an affirmative decision by the Commission in June. Please help us.

Sincerely,

Wayne L. Peterson
City Council Member

copy: Coastal Commission Staff

COASTAL COMMISSION

EXHIBIT # 7
PAGE 99 OF 151

Ilse Lenschow
275 San Joaquin Street
Laguna Beach, CA 92651
(949) 494-1241

May 17, 2000

Mr. Peter Douglas
Executive Director
California Coastal Commission
45 Fremont Street, Ste. 2000
San Francisco, CA 94105

Re: Treasure Island CDP

Dear Mr. Douglas:

This project will be a great benefit to the public as well as the City of Laguna Beach.

For the 25 years I live in Laguna Beach Treasure Island was a private oceanside community and close to the public.

In addition, a fence and heavy vegetation blocked all views to the ocean for approximately 1/3 mi along South Coast Highway.

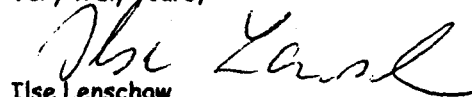
As a member of the Laguna Beach Design Review Board/Board of Adjustments, I participated in 2 public meetings over the 2-1/2-year Treasure Island LCP and CDP approval process. In conjunction with the Laguna Beach Planning Commission, the Board meticulously scrutinized each aspect of the project. We responded to input from the public and the developer, to move this project forward. I found the developer to be very receptive in decreasing the mass and scale of the hotel and the residential units, while increasing the public open space and maximizing public views.

As a former chairperson for the "Coalition of Neighborhood Associations" and the Laguna North Neighborhood Association" I am well informed about this project; the efforts made by the developer; and the public's opinion on both sides of the issue. I believe this is exactly the type of project we need along our coast. It has truly been a collaborative community effort.

In my opinion, this project is a well-balanced use of this beautiful site as a resort, a public park and beach, and a residential neighborhood.

This closed site has been a shameful waste of a precious resource that belongs to everyone. Please allow the gates to open!

Very truly yours,



Ilse Lenschow
Laguna Beach Design Review Board/Board of Adjustment

Cc. California Coastal Commission Staff

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MAY 22 2000

CALIFORNIA
COASTAL COMMISSION

RECEIVED

MAY 23 2000

CALIFORNIA
COASTAL COMMISSION

COASTAL COMMISSION

EXHIBIT # 7
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Michael and Gloria Sullivan
1832 Marapata Drive
Corona del Mar, CA 92625

May 17, 2000

Sara Wan, Chair
California Coastal Commission
22350 Carbon Mesa Road
Malibu, CA 90265

RECEIVED
MAY 22 2000

Re: Treasure Island CDP
Laguna Beach, California

CALIFORNIA
COASTAL COMMISSION

Dear Ms. Wan:

We support the City of Laguna Beach and the previous California Coastal Commission approvals. We are astounded that this wonderful project has not been approved. After years of being a public-denied area with rotting mobile homes, we have a chance of having a first class operation that will bring beauty to the area, along with increased public access.

Please approve the Treasure Island CDP.

Very truly yours,

Gloria S. Sullivan

c: California Coastal Commission Staff ✓
Long Beach, California

COASTAL COMMISSION

EXHIBIT # 7
PAGE 101 OF 151

Edward L. Armstrong
1960 Temple Hills Drive
Laguna Beach, CA 92651-2654
Fax 949-494-1710
Home Phone 949-494-7469
Email earns@msn.com

RECEIVED
MAY 22 2000

CALIFORNIA
COASTAL COMMISSION

May 19, 2000

Ms. Sara Wan, Chair
California Coastal Commission
22350 Carbon Mesa Road
Malibu, CA 90265

Dear Ms. Wan:

As Chair of the California Coastal Commission, I urge you and the Commission to approve the Treasure Island Coastal Development Permit (CDP) as proposed by the Athens Group and approved by the City Of Laguna Beach.

This project received the overwhelming support of the citizens of Laguna Beach in a hard fought ballot issue. Of course, as is often the case, a small but vocal and powerful group behind two organizations are leading the opposition to kill this project. It is difficult to understand why there would be opposition to a project which would bring so many pluses to our community. Pluses such as an estimated \$3 million annually to the City and it's schools; public access to a beautiful beach area previously closed: a window to the sea instead of an unsightly fence, trailers and trees obstructing the view; a world class resort hotel with landscaped grounds; and many more pluses. This is why the majority of Laguna Beach citizens support this project.

Why then the opposition? Perhaps a look at the two organizations leading the attack would provide a clue. Village Laguna and the South Laguna Civic Association and their leaders would have one believe that they are all for motherhood and against sin. Well, I am sure that they are good intentioned and they have the right to their opinion as do I. It is interesting to note their past history however. Both organizations have always been against any development. As an example, Village Laguna fought bitterly in opposing the 3 million gallon reservoir at the Top of the World adding considerable cost to the project and, most damaging, the delay in construction, which may have caused the loss of many homes in the Big Fire. As for the South Laguna Civic Association, their most recent claim to fame is the fight against the Binion Project (located in an adjoining city jurisdiction) based on unfounded water runoff problems. This litigation cost the City of Laguna Beach taxpayers over \$120,000! I could site other examples such as Diamond/Crestview where thousands of taxpayers dollars were spent in fruitless litigation which was the name of the game when POWER was vested in the opposition. In my opinion, this is the key word here in that the activists of these two organizations want to regain their control of the City Council and with it the control of the future of our community. It is called POWER!

Again, I urge you, as the Chair, and the Commission, to approve the Treasure Island CDP as proposed by the Athens Group and approved by the City of Laguna Beach. Please find in favor of the people of Laguna Beach.

Respectfully,

Edward L. Armstrong
Edward L. Armstrong

cc: Coastal Commission Staff

COASTAL COMMISSION

EXHIBIT # 7
PAGE 102 OF 151

Sophia Lee
734 Veneto
Irvine, CA 92614

5/18/00

California Coastal Commission
P.O. Box 1450
200 Ocean gate, 10th Floor
Long Beach, CA 90802-4416

RECEIVED
MAY 22 2000
CALIFORNIA
COASTAL COMMISSION

Re: Treasure Island

To the California Coastal Commission,

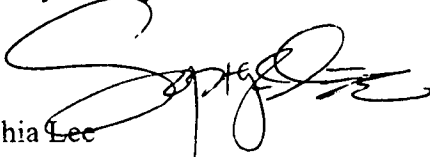
I would like to write this letter to show my support for the new project about to begin at Treasure Island. I believe that this resort will bring a lot of new business and jobs not only to the community but as well as to the economy.

I have seen photographs of what the area currently looks like and believe this resort will beautify the land back to its original beauty.

I am in strong support of this project and hope to see that it gets built so that I can bring my children to the classes and to the beach for the enjoyment of what nature has to offer at its grandest.

Thank you for your time,

Sophia Lee



COASTAL COMMISSION

EXHIBIT # 7
PAGE 103 OF 151

JANET SHANNON
2543 MONACO DRIVE
LAGUNA BEACH, CA 92651

RECEIVED
MAY 22 2000

CALIFORNIA
COASTAL COMMISSION

California Coastal Commission

P.O. Box 1450

200 Ocean Gate, 10th Floor

Long Beach Ca 90802-4416

RE: Treasure Island Coastal Development Permit, Laguna Beach
Terresotto Henry:

The Laguna City Council and the Athens Group have together with the Coastal Commission worked out a wonderful solution for a very meaningful and enjoyable project on a bluff in South Laguna Beach. Most of the community is greatly satisfied with the proposal. The existing conditions are deplorable and probably unsafe: condemnable, maybe.

We are very much in favor of your work and urge the Coastal Commission to approve the Treasure Island CDP proposed by the Athens group and the City of Laguna Beach.

COASTAL COMMISSION

Sincerely -

Janet and Dennis Shannon
May 18, 2000

ERIC LECKBAND
1204 ALICANTE
NEWPORT BEACH, CA 92660

May 18, 2000

California Coastal Commission
P.O. Box 1450
200 Ocean gate, 10th Floor
Long Beach, CA 90802-4416

Re: TREASURE ISLAND

To The California Coastal Commission,

This letter is to show my support for the resort at Treasure Island. It is obvious that a resort of this kind will not only beautify the city of Laguna Beach, but will bring jobs and money with it.

The community has been informed time and again of the benefits this project will bring and I feel that those who are protesting this project are not educated to the facts. I am a local tax paying citizen who supports the project and would like to see this project approved.

Thank you,


Eric Leckband

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MAY 22 2000
CALIFORNIA
COASTAL COMMISSION

COASTAL COMMISSION

EXHIBIT # 7
PAGE 105 OF 151

Carolyn Bailey
68 Park Crest
Newport Coast, CA 92657

May 18, 2000

California Coastal Commission
P.O. Box 1450
200 Ocean Gate, 10th Floor
Long Beach, CA 90802-4416

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CALIFORNIA
COASTAL COMMISSION

Regarding: Treasure Island Resort

Dear Coastal Commissioners:

I am writing in support of the Treasure Island Resort project in Laguna Beach. As an Orange County resident, I am well aware of the pros and cons for the project. I believe that a five star hotel can only bring positive features to an area that is currently neglected. The amenities, public beach access, gardens, restaurants, and public park that the resort plans on developing, will bring beauty and prosperity to the area. Local businesses and residents would benefit from the activity, employment, and amenities that a five star resort would provide.

Sincerely,



Carolyn Bailey
Newport Coast Resident

COASTAL COMMISSION

EXHIBIT # 7
PAGE 106 OF 151

May 18, 2000

California Coastal Commission
P.O. Box 1450
200 Ocean Gate, 10th Floor
Long Beach, CA 90802-4416

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MAY 22 2000

CALIFORNIA
COASTAL COMMISSION

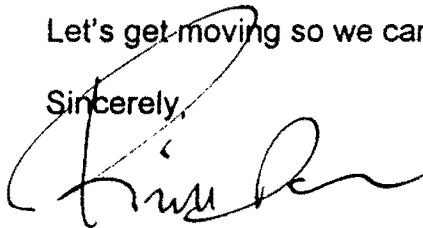
To Whom It May Concern:

I am writing to express my **support** for the **resort at Treasure Island**. Not only will this resort benefit the community financially, it will bring job opportunities.

I feel that once the resort is built, it will give the artists in the area a place to display their talents and gain recognition from the local community as well as the tourists that will visit. As an artist, I am looking forward to having a place to congregate with others and enjoy Laguna Beach and the art it is so well known for.

Let's get moving so we can all enjoy this great new place!

Sincerely,



Richard Darner
21491 Countryside Drive
Lake Forest, CA 92630

COASTAL COMMISSION

EXHIBIT # 7
PAGE 107 OF 151

Anna Hendrickson
621 Thalia
Laguna Beach, CA 92651

May 18, 2000

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CALIFORNIA
COASTAL COMMISSION

California Coastal Commission
P.O. Box 1450, 200 Ocean Gate, 10th Floor
Long Beach, CA 90802-4416

Dear Sirs,

I am writing in support of the new plans for the Treasure Island Resort. As a resident in Laguna Beach I think there are wonderful benefits of this new project like a five-star beach resort, a public bluff top park with gardens, great restaurants, public beach access. Laguna Beach coastline is overcrowded with many old ugly buildings but this project will be refreshing in its natural blend to the surroundings. It is upscale and accessible for the entire community.

Thank you for your support!



Anna Hendrickson

COASTAL COMMISSION

FILE # 7
PAGE 108 OF 151

ANDREW K. SKIVER

May 18, 2000

California Coastal Commission
P.O. Box 1450
200 Ocean Gate, 10th Floor
Long Beach, CA 90802-4416

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MAY 22 2000

CALIFORNIA
COASTAL COMMISSION

Re: Treasure Island Resort

Dear Commissioners,

As a taxpaying resident of Orange County, I am familiar with the plans for the Treasure Island Resort and urge you to approve this spectacular project. Bringing a five star resort with a public park and public beach access to replace an eyesore trailer park that had no public use is a very positive use of California's precious coast. I can't wait to take my wife to a sunset dinner overlooking the Pacific Ocean or to have out of town friends stay in the hotel.

It's a public use, it raises income, it provides jobs...it needs your approval!

Sincerely,



Andrew K. Skiver
Orange County Resident

COASTAL COMMISSION

EXHIBIT # 7
PAGE 109 OF 151

**Megan Aragona
24 Oxbow Creek
Laguna Hills, CA 92653**

RECEIVED
MAY 22 2000

May 18, 2000

California Coastal Commission
P.O. Box 1450
200 Ocean Gate, 10th Floor
Long Beach, CA 90802-4416

CALIFORNIA
COASTAL COMMISSION

Re: TREASURE ISLAND RESORT

Dear California Coastal Commission,

I am writing in support of the proposed Treasure Island Resort. My family and I spend a lot of time in Laguna Beach and having the chance to use the amenities this five star resort has to offer is wonderful.

Not only would the bluff top park, the gardens and the public beach access be a benefit, the employment opportunities would be an even greater benefit to Orange County residents. A resort of this caliber will also raise property value for residents and business owners in the community.

I know that some people have stressed their concern for environmental safety, but the developers of five star resorts such as this are qualified in making sure that the beaches are kept clean and safe. It is to their benefit to be environmentally conscious in order for their project to be a successful one. Currently the project site is nothing but a junky looking area that no one uses and it adds nothing to the beauty of the land.

Thank you for taking the time to hear the people.

Sincerely,



Megan L. Aragona
Orange County Resident

COASTAL COMMISSION

EXHIBIT # 7
PAGE 110 OF 151

May 18, 2000

California Coastal Commission
P.O. Box 1450
200 Ocean Gate, 10th floor
Long Beach, CA 90802-4416

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CALIFORNIA
COASTAL COMMISSION

Dear Commissioners:

I am writing in favor of the Treasure Island Resort for Laguna Beach. I feel it would be a great asset to have a five star hotel in the area with excellent amenities and enormous possibilities for Orange County.

This hotel will upgrade the current dump; which is a huge eye sore to all. This advancement will not only beautify the area, but also create employment opportunities to Orange County residents. Additionally, this will increase the value of the property for area residents and business owners.

I would much rather have an opportunity to sip a cocktail on the veranda overlooking the ocean than walk by a junk pile.

Hear the people – vote in favor of the Treasure Island Resort.

Sincerely,


Anita Attaway
Orange County Resident

COASTAL COMMISSION

EXHIBIT # 7
PAGE 111 OF 151

Laura C. Duey
9 Georgetown
Irvine, CA 92612

May 18, 2000

California Coastal Commission
P. O. Box 1450
200 Ocean Gate, 10th Floor
Long Beach, CA 90802-4416

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MAY 22 2000
CALIFORNIA
COASTAL COMMISSION

RE: TREASURE ISLAND RESORT

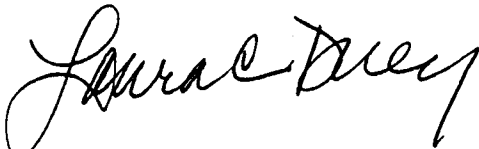
Dear Commissioners,

As a native Californian, I have been enjoying Laguna Beach for the past 40 years. I love this town and all that it has to offer. As someone who is usually resistant to change, I am aware of the proposed Treasure Island Resort, and approve of this development. The existing area is just a disappointment and has been for years.

Laguna is a wonderful destination for many world travelers. The town benefits from the economy brought in by these visitors. A five star resort is just what this town needs where as of late it is almost impossible to make reservations at the more fashionable existing hotels. It benefits the residents, the economy as well as employment opportunities.

I look forward to enjoying another beautiful spot to share with family and friends.

Sincerely,



Laura C. Duey
Orange County Resident

COASTAL COMMISSION

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PAGE 112 OF 151

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MAY 22 2000

CALIFORNIA
COASTAL COMMISSION

May 18, 2000


California Coastal Commission Staff
P.O. Box 1450
200 Ocean Gate, 10th Floor
Long Beach, CA 90802-4416

RECEIVED
MAY 22 2000
COASTAL COMMISSION

Dear Commissioners:

That a small group of people with their own personal and political agenda can attempt to derail such a wonderful project that has already passed the close scrutiny of the community, the city planning commission, the city staff not to mention your organization is a travesty.

As you dismiss this latest delay tactic and allow the project to move forward as planned, it is our hope that you issue a rebuke to those who have caused this unnecessary delay, frustration and expense.



William J. and Toni Strateman
2553 Monaco Drive
Laguna Beach

COASTAL COMMISSION

EXHIBIT # 7
PAGE 113 OF 151

ARNO F. CHAUVEL
444 Alta Vista Way
Laguna Beach, CA. 92651

RECEIVED
MAY 22 2000
CALIFORNIA
COASTAL COMMISSION

May 19, 2000

Sara Wan, Chair
California Coastal Commission
22350 Carbon Mesa Road
Malibu, CA. 90265

Dear Chairperson Wan:

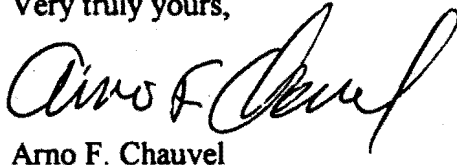
I am a 13 year resident of Laguna Beach. I urge you to continue to support the Treasure Island CDP as proposed by the Athens Group and approved by the City of Laguna Beach.

I urge you to support the City of Laguna Beach and previous California Coastal Commission approvals for Treasure Island. The redevelopment plans are realistic and provide for much-needed public access to the beach, a new public park at the bluff top, and a 5 star resort community.

The CDP has already been approved by the City of Laguna Beach. It is a well conceived and highly anticipated redevelopment of the current run down trailer court that occupies such a wonderful piece of California coast. The trailer court remains an eyesore and blight on our community. Only the privileged few who could afford the high rent to keep a trailer in there could have access to the bluff and beautiful beach. The people who had trailers in Treasure Island did nothing to protect the bluff or the coast.

Please approve the Treasure Island CDP for the future of Laguna Beach and the citizens of California.

Very truly yours,


Arno F. Chauvel

CC: Coastal Commission Staff

COASTAL COMMISSION

EXHIBIT # 7
PAGE 114 OF 151

Walli
918 Meadowlark Lane
Laguna Beach, California 92651
(949) 499-2438

RECEIVED
MAY 22 2000

May 18, 2000

Commissioner Sara Wan, Chairman
California Coastal Commission
45 Fremont Avenue, Suite #2000
San Francisco, CA 94105-2219

CALIFORNIA
COASTAL COMMISSION

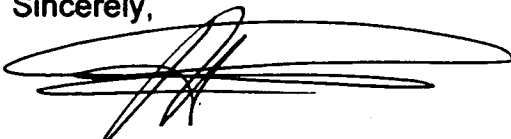
Dear Commissioner Wan:

I am sending you the attached petition signed by numerous Laguna Beach mothers who support the plans at Treasure Island. We are asking you to please consider all of the public benefits offered by the Treasure Island project and vote to allow this project to move forward.

As our petition states, the beach access provided by the redevelopment plans for Treasure Island offer a unique opportunity for all families who wish to visit the beach. If this plan becomes a reality, we will be able to more safely and easily bring our children to the beach. The ramps that will be offered with this development plan are a great benefit to this community because there are very few beaches that are easily accessible.

We ask you to please consider the many families and children who will benefit from the beach access provided by the Treasure Island plan. Please vote in favor of the Treasure Island project becoming a reality in our future.

Sincerely,



Rosemary Walli

CC: California Coastal Commission Staff
South Coast District

COASTAL COMMISSION

EXHIBIT # 7
PAGE 115 OF 151

**Laguna Beach Mothers Support
Beach Access to Treasure Island**

RECEIVED
MAY 22 2000
CALIFORNIA
COASTAL COMMISSION

Dear Chairperson Wan, Members and staff of the California Coastal Commission:

The Treasure Island project offers the families of Laguna Beach and the general public increased access to a beautiful beach. We would like to ask for your support of this plan and ask you to vote in favor of this project so we can enjoy the benefits of this plan as quickly as possible.

For the majority of beaches in Laguna Beach there are cliffs that require the use of stairs to gain access. For families with young children who cart wagons, strollers and numerous play toys with them to the beach, we are unable to enjoy the greatest asset of our community, the beach. For people living in a beach town this is such a shame for our children.

The Treasure Island project will provide access to the beach via an ADA approved access route. This means we can bring our wagons full of children and play toys to the beach. We really want to see this project completed so we can enjoy the beach with our children while they are still young.

In addition, to this wheel-chair access ramp to the beach, we will have 70 public parking spaces so we can park near beach and bluff-top park. We want to experience the benefits that this project will bring our community.

The families of Laguna Beach ask that the Commission approve the Treasure Island project and allow us to more easily share the joy of the beach with our children.

Sincerely,

Tori Stalker

Robyn Dretsen

Kirchhoff

Zoe Gavin

L. Robinson

Kelly Moore

Samantha Allen

Leo Vils

Portia Tressalt

C. D. King COASTAL COMMISSION

Laguna Beach Mothers Support
Beach Access to Treasure Island

Tamara Giffney
[Signature]

Susan Sigist

Barbara M. Murray

Tracy Handel

Robert L. Loughlin

Simone Siles

Debbie Chinorian

H. Poliz-Sues

Laura Benjamin

Horngi

Margo Stet

Al & Belinda

Mara Caplan
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MAY 22 2000

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COASTAL COMMISSION

COASTAL COMMISSION

RECEIVED

**Laguna Beach Mothers Support
Beach Access to Treasure Island**

MAY 22 2000

CALIFORNIA
COASTAL COMMISSION

Dear Chairperson Wan, Members and staff of the California Coastal Commission:

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The families of Laguna Beach ask that the Commission approve the Treasure Island project and allow us to more easily share the joy of the beach with our children.

Sincerely,

Rosemary Wells

Jean Fox

Linda Rau

Linda Boron

L. J. A.

Kathy Sandola

Luanne McInerney

Pat Sucker

[Signature]

William Kelly

Laguna Beach Mothers Support
Beach Access to Treasure Island

RECEIVED
MAY 22 2000
CALIFORNIA
COASTAL COMMISSION

Micki Zmijewski

Cristi M Renner

Jennifer Gasparian

Jackie

Amie Hader

Monica Weston

Kelly Wade

Licia Maggetti

Nancy Miranda

Monia McGinn

Erin Gavin

Katie Tynan

Olivia Obermeyer

Julie O'Brien

Boeth Renner

Tracy Zona

Danielle Zkett

COASTAL COMMISSION

and Fathers
**Laguna Beach Mothers' Support
Beach Access to Treasure Island**

RECEIVED
MAY 22 2000
CALIFORNIA
COASTAL COMMISSION

Dear Chairperson Wan, Members and staff of the California Coastal Commission:

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The families of Laguna Beach ask that the Commission approve the Treasure Island project and allow us to more easily share the joy of the beach with our children.

Sincerely,

Janice Gibbs
[Signature]
Michelle Wray
Margie O'Brien
Marlene Queen

Beverly Kent
Susan Q. Seybold
Susan Campbell
Jennifer Dudley
[Signature]

Laguna Beach Mothers Support
Beach Access to Treasure Island

Frank Seers

Judy Manning

Catherine Pittman

Diana L. Brown

Cindy Selley

Patricia Pootz

Julie Boe

Edith

Julia Martin

Edy Ann Rahn

John Kasper

COASTAL COMMISSION

Mr. Peter T. Mason
4040 Park Blvd.
Palo Alto, CA 94306

RECEIVED
MAY 22 2000
CALIFORNIA
COASTAL COMMISSION

May 15, 2000

Mr. Peter Douglass, Executive Director
California Coastal Commission
45 Freemont St., Ste. 2000
San Francisco, CA 94105

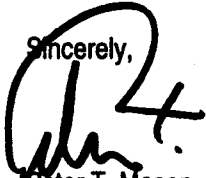
Dear Mr. Douglass:

Please consider this a record of my support for the Treasure Island Coastal Development Permit as proposed by the Athens Group and as approved by the City of Laguna Beach. I support the City of Laguna Beach, previous California Coastal Commission approvals, the redevelopment plans for increased public access, and the public bluff-top park and five-star resort community.

This development would be a great benefit to the Laguna area and the public will gain additional access to the coast. Much of the developed project will be retained as new parkland and public amenities, and views to the ocean from coast highways will be greatly improved. The resort itself and its restaurants will also be open to the public and will afford scenic ocean and coastline views complementing the whole area.

I urge the Coastal Commission to approve the Treasure Island CDP as proposed by Athens Group and approved by the City of Laguna Beach. Thank you for your consideration.

Sincerely,



Peter T. Mason, AIA

Cc: Coastal Commission Staff

COASTAL COMMISSION

EXHIBIT # 7
PAGE 122 OF 151

RECEIVED

MAY 22 2000

May 19, 2000

Page 1 (of 2)

California Coastal Commission
Re: Treasure Island Development
Laguna Beach, California

CALIFORNIA
COASTAL COMMISSION

Subject: Appeals by CoastKeepers, SLCA, Village Laguna
To be reviewed June 12-16 @ Santa Barbara Heari

Ms. Sara Wan, Chairwoman:

I am a 30 year resident of Laguna Beach. I am the Founder of the Clean Aliso Creek Association and Chairman of the Clean Water Now! Coalition, which includes: The Whaleman Foundation, Doheny Longboarders Surfing Assn., Laguna SurfRider Chapter, and Clean Aliso Creek Assn. I have been frequenting this beach for over 40 years. I write to you as an individual and mention the above information to assure you of my first hand knowledge of this site, and to assure you of my legitimacy. Go up on the web and check local newspaper articles, check with the San Diego Regional Water Quality Board, or with Orange County public officials, and you'll discover that my organization has led the charge for water quality issues this past 1 1/2 years. Clean Water Now! Has a DBA of over 6 months with non-profit pending.

All that said, I am distressed by the FORMER members of my CWN!C, SLCA and CoastKeepers, and their misrepresentation of the real issues vis-a-vis Treasure Island.

CoastKeepers Garry Brown doesn't even go into the ocean. His own advisor, Dennis Kelly, Marine Biology Professor, Orange Coast College, was quoted in an interview (I was the only local activist quoted) LA TIMES, OC METRO, 1/19/00, "It is not a normal marine habitat....it tends not to be a stable community due to long term exposure to urban run-off." Also, "pollution has changed the marine environ's structure," and that "eventually, the diversity of marine species in Laguna Beach will decrease because of an unbalanced ecosystem." It is my observation that during construction, AND ONLY DURING CONSTRUCTION, will this already fragile system be at risk.

It is a known fact that the kelp beds cannot return, aiding this healing process. The urban runoff at Aliso Creek Beach, some 3-400 meters south of Treasure Island, is warmer than the prevailing ocean water. Approximately 3-4 MILLION GALLONS PER DAY (dry flow), and considerably more during rainy events, the 57 Degree temp. (Or lower) necessary to begin reforestation is compromised by the inland urban runoff. Therefore, the immediate vicinity ocean temperature (never lower than approx. 55-57 degrees) has little or no chance to recover. The local lobster fishermen disturb the bottom continually, as do local fishermen. Kelp reforestation was attempted by Cal-Tech some 15 years ago only to wind up on our beaches. A dive to the bottom reveals a marine desert.

Moreover, 95% of all of the surface runoff emerging from the outfall pipes at this site originates from Pacific Coast Highway (Cal-Trans) and from inland

EXHIBIT # 7
PAGE 123 OF 151

(City of Laguna Beach). IN ORDER TO BLOCK THIS PROJECT, THE APPELLANTS ARE ATTEMPTING TO MAKE THE ATHENS GROUP RESPONSIBLE FOR FACTORS OUT OF THEIR SPHERE OF INFLUENCE.

Page 2 (of 2)

Another example of duplicity is the diversion issue. Diversion is a "bandaid," as acknowledged by SurfRider Director Chris Evans, SDRWQC Board Chair Wayne Baglin, and Garry Brown of CoastKeepers. Also, the permit to divert was enacted in 1997, and is on a year to year basis. Asking this developer to year 'round divert is asking the IMPOSSIBLE AND UNKNOWABLE. At approximately 15 inches per year, an average # of approx. 20-25 days per year have significant (1/2 inch) rainfall or more. Diverting in an EPISODIC, event by event, disregarding the current calendar mentality of May-October would be a firmer grasp of the issues at hand.

It is odd that Michael Beanan of SLCA is attempting to convince one of my CWN!Coalition Board members, Mr. Scott Tenney, Environmental Planner, Mobil/Exxon Oil of California (Torrance Division) that he wants funds to bring back this habitat at Treasure Island. As pointed out above, this habitat was affected, is being affected, and will continue to be adversely affected by factors outside the control of this developer. THIS DEVELOPER SHOULD NOT INHERIT THE SINS OF THE FATHER (previous planning mistakes by the county), NOR SHOULD THE ATHENS GROUP BE FORCED INTO THE POSITION OF TRYING TO CLEAN UP POLLUTION NOT OF ITS MAKING. Fossil fuel catchbasin filters, strident streetsweeping with vacuum trucks, on-site environmental monitoring by an independent, disinterested party, pollution control by Cal-Trans and the City of Laguna Beach from upstream sources, etc., should be implemented.

In conclusion, if the most out-spoken water quality coalition, the CLEAN WATER NOW! COALITION, feels that with the proper caveats this project should move forward, then let it do so. Issues of aesthetics, petty local politics, or attempting to insinuate a Newport Beach group into an area (CoastKeepers) strictly to gather publicity and line their own pockets through litigation should be considered by this commission. In theatre, they tell the actors "Here's your motivation in this scene." Peruse the biographies in O.C. WEEKLY from November of 1999 and February 18, 2000 re: Garry Brown ripping off the Boy Scouts of America, his own business partners, admitting to buying (\$25,000) a planning commissioner, owing hundreds of thousands to the IRS. Add to this SLCA, and especially Michael Beanan, who litigate only to obstruct and gain financial reward. Mr. Beanan led civil unrest at UC Irvine to intentionally provoke being fired (he was asst. Dean of Students) and squeezed \$250,000 out of the University system.

Look at the appeal knowing that their means may be valid (appeal process), but their objectives are another agenda altogether. Handcuff this developer to make the strictist of standards and performance during and subsequent to construction. To set a precedent of forcing every developer to cure previous mistakes of the county and city in its vicinity, this is truly unjust.

Thank you for your time. If you wish to reach me:

Roger E. Butow

ROGER
VON BUTOW

RVONBUTOW@JUNO.COM

1136 1/2 GLENNEYRE

LAGUNA BEACH 92651

Phone: (949) 497-4816
EXTENT # 7

PAGE 124 OF 151

Ilse Lenschow
275 San Joaquin Street
Laguna Beach, CA 92651
(949) 494-1241

May 17, 2000

RECEIVED
MAY 22 2000

CALIFORNIA
COASTAL COMMISSION

Anne Kramer
California Coastal Commission
South Coast Area Office
200 Oceangate, Suite 1000
Long Beach, CA 90802-4302

Re: Treasure Island CDP

Dear Ms. Kramer:

This project will be a great benefit to the public as well as the City of Laguna Beach.

For the 25 years I live in Laguna Beach Treasure Island was a private oceanside community and closed to the public.

In addition, a fence and heavy vegetation blocked all views to the ocean for approximately 1/3 mile along South Coast Highway.

As a member of the Laguna Beach Design Review Board/Board of Adjustments, I participated in 22 public meetings over the 2-1/2-year Treasure Island LCP and CDP approval process. In conjunction with the Laguna Beach Planning Commission, the Board meticulously scrutinized each aspect of this project. We responded to input from the public and the developer, to move this project forward.

I found the developer to be very receptive in decreasing the mass and scale of the hotel and the residential units, while increasing the public open space and maximizing public views.

As a former chairperson for the "Coalition of Neighborhood Associations" and the Laguna North Neighborhood Association" I am well informed about this project; the efforts made by the developer; and the public's opinion on both sides of the issue. I believe this is exactly the type of project we need along our coast. It has truly been a collaborative community effort.

In my opinion, this project is a well-balanced use of this beautiful site as a resort, a public park and beach, and a residential neighborhood.

This closed site has been a shameful waste of a precious resource that belongs to everyone. Please allow the gates to open!

Very truly yours,



Ilse Lenschow
Laguna Beach Design Review Board/Board of Adjustment

COASTAL COMMISSION

EXHIBIT # 7
PAGE 125 OF 151



RECEIVED
MAY 22 2000

CALIFORNIA
COASTAL COMMISSION

May 18, 2000

Peter Douglass, Executive Director
California Coastal Commission
45 Fremont Street, Ste. 2000
San Francisco, CA 94105

Dear Sir:

As a two term City Council Member in Laguna Beach I am concerned about the possibility of additional delays in the Treasure Island project. This project has had strong public support. This support has come not only from the City Council, but school board members, and representatives of the Chamber of Commerce, Visitors Bureau, and other local organizations.

We have had two special elections over a ten year period and both have supported moving ahead. I am asking that you support the previous council decisions as well as the 10 to 1 approval from the Coastal Commission last year and help to keep this project on track.

This property, with it's incredible beaches, has been closed to the public for to long. The water runoff from Coast Highway is unacceptable. These issues and many more will all be corrected with an affirmative decision by the Commission in June. Please help us.

Sincerely,

Wayne L. Peterson
City Council Member

copy: Coastal Commission Staff ✓

COASTAL COMMISSION

EXHIBIT # 7
PAGE 126 OF 151



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MAY 22 2000

CALIFORNIA
COASTAL COMMISSION

2925 Chillon Way
Laguna Beach, CA
92651-2014

May 16, 2000

Director
Coastal Commission Staff
P O Box 1450
200 Ocean Gate, 10th Floor
Long Beach, California 90802-4416

Dear Madam or Sir:

The purpose of this letter is to express my unqualified support for the improvement of the former trailer park known as Treasure Island.

As a native Californian and a summer resident for 35 years and a full time resident for 45 years in Laguna Beach, I have a deep and passionate desire to have only projects developed which would enhance the natural beauty of our coast line while making more shoreline property available for all Californians to enjoy.

The project which is envisioned for the property would both improve the scenic aspects and revert private beaches for appropriate public enjoyment. Both worthy causes.

It is my understanding that this project has had a previous approval; and I know for a fact that by public referendum the majority of Laguna residents approve this project.

For the benefit of all Californians, it is my fervent hope that the appeal which has been filed will be denied.

Sincerely yours


Grant W. McCombs

COASTAL COMMISSION

EXHIBIT # 7
PAGE 127 OF 151

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MAY 22 2000
CALIFORNIA
COASTAL COMMISSION

California Coastal Commission Staff
P.O. Box 1450
200 Oceangate, 10th floor
Long Beach California 90802-4416

May 16, 2000

Re: Approval of Treasure Island Coastal Development Permit

I am a homeowner living about a mile north of the Treasure Island site. The plans of the Athens Group for development of an oceanfront park with increased public access and a five-star resort community are very well conceived. I look forward to the ground breaking and implementation of their designs. This project will be a great asset to our community in its facilities, esthetics and financial contributions. We'll be able to hold arts, charitable and civic functions of more than 140 people and not have to leave Laguna Beach to do so. We'll be able to walk south to a beach and park and have lunch on the hotel terrace. We'll be able to see the ocean as we drive along Coast Highway. Please do not let a small group of nay-sayers obstruct this good plan for Laguna Beach!

Please support the City of Laguna Beach and previous California Coastal Commission approvals and approve the Treasure Island CDP as proposed by the Athens Group.



Bobbi Cox
1945 Glenneyre
Laguna Beach California 92651
949-494-1513
bobbicox@juno.com

COASTAL COMMISSION

EXHIBIT # 7
PAGE 128 OF 151

WILSON & ASSOCIATES

May 14, 2000

Ms. Shirley Dettloff, Commissioner
California Coastal Commission
City of Huntington Beach
2000 Main Street
Huntington Beach, CA 92648

RECEIVED
MAY 22 2000
CALIFORNIA
COASTAL COMMISSION

Dear Ms. Detloff:

As a frequent visitor to Laguna Beach and the surrounding community, I am writing in support of the redevelopment plans for a five star resort community and public bluff-top park at the Treasure Island site.

I support the previous approvals by the California Coastal Commission and the City of Laguna Beach and want to see the Coastal Commission approve the Treasure Island Coastal Development Permit.

The development as proposed by the Athens Group is outstanding in terms of quality of design and sensitivity to the nuances of the site. I believe the development would enhance the entire community while providing increased public access to the beautiful coastline along this site.

The Athens Group has a reputation for developing projects of superior quality while respecting the needs and desires of the local community.

Sincerely,



Cheryl Neumann
Chief Operating Officer &
Executive Vice President

✓cc: Coastal Commission Staff

COASTAL COMMISSION

LAW OFFICES
WARREN M. STANTON
1622 SO. GAFFEY STREET, SUITE 201
SAN PEDRO, CALIFORNIA 90731
TELEPHONE (310) 831-2308

May 22, 2000

California Coastal Commission
South Coast Area
P.O. Box 1450
200 Oceangate, 10th Floor
Long Beach, CA 90802-4416

RECEIVED
FAX (310) 832-3077
South Coast Region
MAY 26 2000
CALIFORNIA
COASTAL COMMISSION

Re: **Permit Number 5-99-206**
Riviera Drive @ Monaco Drive, Laguna Beach

Gentlemen:

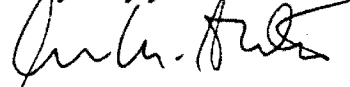
I have been retained by Mr. Frank Arciero whose home is located at 2956 Riviera Drive, Laguna Beach. My client's home is directly across the street from this proposed development.

Mr. Arciero has been residing in his home for the past 16 years and enjoyed the view of the ocean and environs. As is evident from the area and the spacious homes of both Irvine Cove and Abalone Cove, much pride of ownership exists. Any developments of the subject property should be consistent as in that neighborhood.

While private rights to build and erect structures are important, they should be balanced by the potential damage to the natural beauty of the area and the detriment to others. My client wants to preserve the resources as they exist and would request the Commission to require any development on the subject premises be consistent with the standards in place for that area and with minimum damage to my client and others similarly situated. I would appreciate your forwarding any reports or comments on this issue already promulgated.

Please keep me advised of any hearings, decisions or meetings regarding the subject. I appreciate your consideration of this letter and our requests.

Very truly yours,


WARREN M. STANTON

/sll

cc: Mr. Frank Arciero

COASTAL COMMISSION

EXHIBIT # 7
PAGE 130 OF 151



LAGUNA BEACH *Chamber of Commerce*

357 Glenneyre • Laguna Beach, CA 92651 • (949) 494-1018 Ext. 5 • FAX (949) 376-8916

RECEIVED
MAY 22 2000

May 17, 2000

California Coastal Commission Staff
P.O. Box 1450
200 Ocean Gate, 10th Floor
Long Beach, CA 90802-4416

CALIFORNIA
COASTAL COMMISSION

Dear Staff:

I would like to express my complete support for the Treasure Island Resort and accompanying land use proposal in Laguna Beach, California. Further, I support previous City of Laguna Beach and California Coastal Commission approvals of the project. My support includes redevelopment plans for increased public access, a public bluff top park and the resort community. I strongly encourage the Coastal Commission to approve the Treasure Island CDP as proposed by the Athens Group and approved by the City of Laguna Beach.

The development is of paramount importance to the future economic health of Laguna Beach. Many small and medium-size businesses stand to benefit from the development, including those selling products and services directly to guests and residents, as well as companies primarily engaged in business-to-business sales. The project will be a tremendous economic boost to our city overall, while providing increased opportunity for residents of Laguna Beach to gain greater access to our beautiful coastline. Please approve this project!

Sincerely,

Dan Purcell
Director of Membership

CALIFORNIA COASTAL COMMISSION

Gregory R. Mickelson

May 16, 2000

RECEIVED

MAY 23 2000

CALIFORNIA
COASTAL COMMISSION

Commissioner Sara Wan, Chairman
California Coastal Commission
45 Fremont Avenue, Suite #2000
San Francisco, CA 94105-2219

RECEIVED
MAY 24 2000

RE: Support of Treasure Island Resort Project

CALIFORNIA
COASTAL COMMISSION

Dear Chairperson Wan:

After years of debate over how to redevelop the Treasure Island mobile home site, the community and the City have come up with a plan that is respectful of the land and provides the people of California many benefits. The Coastal Commission unanimously approved an LCP two years ago. Since that time the project was approved by a majority of the community in a referendum election and spent nine months in a thorough entitlement process. Currently, the plan has been refined to include more park space and reduced the number of homes on the site from 37 to 31.

This plan has been thoroughly studied and reviewed. Now it is time to move forward. I urge the Coastal Commission to support the Treasure Island Local Coastal Program and let this plan move forward without further delays.

As a frequent visitor and future resident of Laguna Beach, I thank you for your stewardship of our coastline. Please know that you are doing the right thing in the eyes of this community by voting to allow this plan to move forward.

Sincerely,



Greg Mickelson

COASTAL COMMISSION

DARRIN OLSON
207 LUGONIA ST., APT. B
NEWPORT BEACH, CA 92663
(949) 515-8151

RECEIVED

MAY 23 2000

CALIFORNIA
COASTAL COMMISSION

May 19, 2000

RECEIVED
MAY 24 2000

CALIFORNIA
COASTAL COMMISSION

Commissioner Sara Wan, Chairman
California Coastal Commission
45 Fremont Avenue, Suite #2000
San Francisco, CA 94105-2219

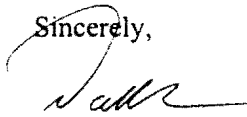
Dear Chairperson Wan:

After years of debate over how to redevelop the Treasure Island mobile home site, the community and the City have come up with a plan that is respectful of the land and provides the people of California many benefits. The Coastal Commission unanimously approved an LCP two years ago. Since that time the project was approved by a majority of the community in a referendum election and spent nine months in a very thorough entitlement process. Currently, the plan has been refined to include more park space and reduced the number of homes on the site from 37 to 31.

This plan has been thoroughly studied and reviewed. Now it is time to move forward. I urge the Coastal Commission to support the Treasure Island Local Coastal Program and let this plan move forward without further delays.

As a supporter of the Laguna Beach community, I thank you for your stewardship of our coastline. Please know that you are doing the right thing in the eyes of this community by voting to allow this plan to move forward.

Sincerely,


Darrin Olson

COASTAL COMMISSION

EXHIBIT # 7
PAGE 133 OF 151

Steve & Susan Geise
6531 Crista Palma Drive
Huntington Beach, CA 92647

RECEIVED

MAY 23 2000

CALIFORNIA
COASTAL COMMISSION

RECEIVED
MAY 24 2000

CALIFORNIA
COASTAL COMMISSION

May 19-2000

Members, California Coastal Commission
45 Fremont Avenue, Suite 2000
San Francisco, CA 94105-2219

RE: Laguna Beach Treasure Island Project

Dear California Coastal Commission members:

Please consider this a letter in **SUPPORT** of the plan approved by the City of Laguna Beach for the development project at Treasure Island. As a child growing up on the California Coast and surfing along our beautiful shores I have long enjoyed this area. We have often wondered if the redevelopment of this abandoned mobile home site we be a "positive" change, thus giving us access to this beautiful piece of coastline. We urge you to uphold the Treasure Island Local Coastal Program so this plan can move forward.

We understand that you are reviewing an issue regarding grading of the bluff. It seems apparent to us that the developers of the five-star resort and of a public park will take care to do this right and in the scheme that they *surely have been directed* to follow. We feel confident they share the desire to keep the area safe and beautiful for everyone.

We have reviewed the plan as it now stands now and are delighted with it. We are anxious for it to move forward. The residents of California have waited long enough for the public benefits this project will bring when it is completed: the access to a fantastic beach, new public parks, the Coast Highway view corridors, a five-star resort and significant economic benefits for our City and our schools.

We are confident that the members of this board will do the right thing when you vote on this project and approve it once and for all. Lets make it time to move ahead in order for all of us to benefit from the beautiful coastline and parks it will provide.

Thank you for your time.

Sincerely,

Steve & Susan Geise
Steve & Susan Geise

COASTAL COMMISSION

EXHIBIT # 7
PAGE 134 OF 151

May 18, 2000

Commissioner Sara Wan
California Coastal Commission
45 Fremont Avenue, Suite 2000
San Francisco, CA 94105-2219

RECEIVED
MAY 23 2000

CALIFORNIA
COASTAL COMMISSION

Dear Chairperson Wan and Members of the California Coastal Commission Staff:

I am writing to express my support for the Treasure Island project in Laguna Beach. I believe this project will bring numerous benefits to Laguna Beach. I especially look forward to increased beach access and a rambling public bluff top park for South Lagunans to enjoy.

The plan proposed by The Athens Group has been thoroughly studied and reviewed. Many local residents and future visitors to Laguna Beach look forward to the development of the Treasure Island project. I urge the Coastal Commission to support the Treasure Island Local Coastal Program and let this plan move forward with no further delays.

I urge you to please think about the increased beach access, public park and significant economic benefit that the Treasure Island project will provide our community. I ask you to please vote in favor of the Treasure Island project.

Sincerely,

Jeff Cavanaugh

Jeff Cavanaugh
14 South Portola
Laguna Beach, CA 92651

cc: California Coastal Commission

COASTAL COMMISSION

EXHIBIT # 7
PAGE 135 OF 151

May 19, 2000

Commissioner Sara Wan, Chairman
California Coastal Commission
45 Fremont Avenue, Suite #2000 San Francisco, CA 94105-2219

Dear Chairperson Wan:

After years of debate over how to redevelop the Treasure Island mobile home site, the community and the City have come up with a plan that is respectful of the land and provides the people of California many benefits. The Coastal Commission unanimously approved an LCP two years ago. Since that time the project was approved by a majority of the community in a referendum election and spent nine months in a very thorough entitlement process. Currently, the plan has been refined to include more park space and reduced the number of homes on the site from 37 to 31.

This plan has been thoroughly studied and reviewed. Now it is time to move forward. I urge the Coastal Commission to support the Treasure Island Local Coastal Program and let this plan move forward without further delays.

As a resident of the Laguna Beach community, I thank you for your stewardship of our coastline. Please know that you are doing the right thing in the eyes of this community by voting to allow this plan to move forward.

Sincerely,



Victoria V. Thuy

RECEIVED

MAY 23 2000

CALIFORNIA
COASTAL COMMISSION
RECEIVED
MAY 24 2000

CALIFORNIA
COASTAL COMMISSION

COASTAL COMMISSION

EXHIBIT # 7
PAGE 136 OF 151

KOLL

DEVELOPMENT COMPANY

RECEIVED

MAY 23 2000

CALIFORNIA
COASTAL COMMISSION

May 10, 2000

RECEIVED
MAY 24 2000

CALIFORNIA
COASTAL COMMISSION

Commissioner Sara Wan, Chairman
California Coastal Commission
45 Fremont Avenue, Suite #2000 San Francisco, CA 94105-2219

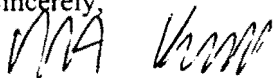
Dear Chairperson Wan:

After years of debate over how to redevelop the Treasure Island mobile home site, the community and the City have come up with a plan that is respectful of the land and provides the people of California many benefits. The Coastal Commission unanimously approved an LCP two years ago. Since that time the project was approved by a majority of the community in a referendum election and spent nine months in a very thorough entitlement process. Currently, the plan has been refined to include more park space and reduced the number of homes on the site from 37 to 31.

This plan has been thoroughly studied and reviewed. Now it is time to move forward. I urge the Coastal Commission to support the Treasure Island Local Coastal Program and let this plan move forward without further delays.

As a resident of the Laguna Beach community, I thank you for your stewardship of our coastline. Please know that you are doing the right thing in the eyes of this community by voting to allow this plan to move forward.

Sincerely,



Martin Krupoff
Executive Vice President, Finance
Koll Development Company

COASTAL COMMISSION

KOLL

DEVELOPMENT COMPANY

RECEIVED

MAY 23 2000

CALIFORNIA
COASTAL COMMISSION

May 16, 2000

RECEIVED
MAY 24 2000

CALIFORNIA
COASTAL COMMISSION

Members, California Coastal Commission
45 Fremont Avenue, Suite 2000
San Francisco, CA 94105-2219

Dear California Coastal Commission members:

I am writing to express my support for the plan approved by the City of Laguna Beach for the development project at Treasure Island. I urge you to uphold the Treasure Island Local Coastal Program so this plan can move forward.

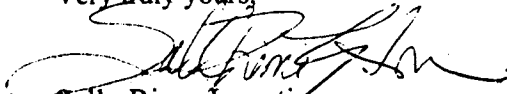
It is my understanding that you are reviewing a single issue regarding grading of the bluff. It seems apparent to me that the developers of the five-star resort *and of a public park* will take care to do this right. I am sure they want it not only safe, but aesthetically pleasing as the rest of us would like to see it.

I really like the plan as it now stands, and am anxious for it to move forward. The residents of California have waited long enough for the public benefits this project will bring when it is completed: the access to a fantastic beach, new public parks, the Coast Highway view corridors, a five-star resort and significant economic benefits for our City and our schools.

Please do the right thing when you vote on this project and approve it once and for all. I believe that in fairness to the developer and the residents of Laguna Beach you must support it and allow us to finally acquire the benefits the project will provide.

Thank you for letting me share my thoughts with you.

Very truly yours,


Sally Rime-Longtin
Koll Development Company

COASTAL COMMISSION

May 17, 2000

Members, California Coastal Commission
45 Fremont Avenue, Suite 2000
San Francisco, CA 94105-2219

RECEIVED
MAY 23 2000
CALIFORNIA
COASTAL COMMISSION
MAY 24 2000
CALIFORNIA
COASTAL COMMISSION

Dear California Coastal Commission members:

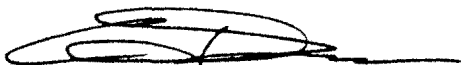
I am writing to express my support for the plan approved by the City of Laguna Beach for the development project at Treasure Island. As an active and long-time member of the community, I have waited for the redevelopment of this abandoned mobile home site. I urge you to uphold the Treasure Island Local Coastal Program so this plan can move forward.

I really like the plan as it now stands, and am anxious for it to move forward. The residents of California have waited long enough for the public benefits this project will bring when it is completed: the access to a fantastic beach, new public parks, the Coast Highway view corridors, a five-star resort and significant economic benefits for our City and our schools.

Please do the right thing when you vote on this project and approve it once and for all. I believe that in fairness to the developer and the residents of Laguna Beach you must support it and allow us to finally acquire the benefits the project will provide.

Thank you for letting me share my thoughts with you.

Very truly yours,



Jeff Dun
249 La Jolla Drive
Newport Beach, California 92663
(949) 574-1620

COASTAL COMMISSION

EXHIBIT # 7
PAGE 139 OF 151

Rod L. Maxson
128 Topaz Ave.
Balboa Island, CA 92662

RECEIVED

MAY 23 2000

CALIFORNIA
COASTAL COMMISSION

May 15, 2000

RECEIVED
MAY 24 2000

CALIFORNIA
COASTAL COMMISSION

Members, California Coastal Commission
45 Fremont Avenue, Suite 2000
San Francisco, CA 94105-2219

Dear California Coastal Commission members:

I am writing to express my support for the plan approved by the City of Laguna Beach for the development project at Treasure Island. As an active and long-time member of the Laguna Beach community, I have waited for the redevelopment of this abandoned mobile home site. I urge you to uphold the Treasure Island Local Coastal Program so this plan can move forward.

It is my understanding that you are reviewing a single issue regarding grading of the bluff. It seems apparent to me that the developers of the five-star resort *and of a public park* will take care to do this right. I am sure they want it not only safe, but aesthetically pleasing as the rest of us would like to see it.

I really like the plan as it now stands, and am anxious for it to move forward. The residents of California have waited long enough for the public benefits this project will bring when it is completed: the access to a fantastic beach, new public parks, the Coast Highway view corridors, a five-star resort and significant economic benefits for our City and our schools.

Please do the right thing when you vote on this project and approve it once and for all. I believe that in fairness to the developer and the residents of Laguna Beach you must support it and allow us to finally acquire the benefits the project will provide.

Thank you for letting me share my thoughts with you.

Very truly yours,



Rod L. Maxson

COASTAL COMMISSION

EXHIBIT # 7
PAGE 140 OF 151

RECEIVED
MAY 22 2000

CALIFORNIA
COASTAL COMMISSION

1278 Glenneyre, PMB 20
Laguna Beach, CA 92651
May 13, 2000

California Coastal Commission Staff
P.O. Box 1450
200 Ocean Gate, 10th Floor
Long Beach, CA 90802-4416

In re: Treasure Island Coastal Development Plan

Dear Commissioners:

I am writing to you today regarding the upcoming hearing on the Treasure Island Resort project in Laguna Beach. I have followed this project through the many long years of proposals, hearings, modifications and, finally approval by the City of Laguna Beach Planning Commission and City Council. It has amazed me that the original and current owners have shown such willingness to accommodate the requests and concerns of the planners, council members and residents of our city.

We are on the verge of receiving the gift of a wonderful oceanfront park and a beautiful resort which will provide us with badly needed meeting spaces and event facilities. This is land which has for many, many years been closed off to the public by gates, dense natural growth and by the obstruction of deteriorating older mobile homes. To think that we will be able to enjoy this spectacular park free of charge is incredible. That the owner has agreed to absorb the cost of maintaining the park is even more amazing.

Sadly, however, there are in Laguna a few predictable nay sayers who seems to have made a life out of objecting to each and every project that comes before the City. I think they have convinced themselves that their positions are valid (although they smack suspiciously of self-aggrandizement and a determination to subvert that old and oft forgotten principle of Private Property Rights). They masquerade under the mantel of environmental protectors but, I guarantee that if you asked them whether they would give up their objections to "slope stabilization, location of public access and facilities and view corridors" in return for a no-build, all-for-free public park covering the whole site, you would hear those objections dissolve into a deafening silence.

I favor the development as approved by the City of Laguna Beach and supported by the majority of our residents. I hope you will sustain the years of hard work by our city staff, commissioners and council members and endorse this project for the good of our community and for the public.

Sincerely,

Janet Owens
Janet Owens

COASTAL COMMISSION

EXHIBIT # 7
PAGE 141 OF 151

**WELLS
FARGO**

RECEIVED
MAY 22 2000

CALIFORNIA
COASTAL COMMISSION

May 12, 2000

Peter Douglass, Executive Director
California Coastal Commission
45 Fremont Street, Ste 2000
San Francisco, CA 94105

Dear Mr. Douglass:

This letter is in support of the proposed Treasure Island CDP which is being presented by the Athens Group and approved by the City of Laguna Beach.

I have been involved with the lengthy process for several years and did testify at the 1998 hearings in support of the general project which the Coastal Commissioners approved in concept. My position as President of the Laguna Beach Chamber of Commerce was to support the project for the good of both residents and business owners.

I would never support a project such as this, however, without a personal commitment to doing the right thing. What they are proposing to do is the right thing, in my opinion. When you visit the site, and see the problems, you can also see the possibilities. This beautiful spot will someday host people of all ages and positions and will be a credit to the community and to the people who worked so hard to make it a reality.

Thank you for taking the time to seek opinions.

Sincerely,


Bonnie L. Rohrer
Vice President

Immediate Past President, Laguna Beach Chamber of Commerce

COASTAL COMMISSION

✓ cc: Coastal Commission Staff

EXHIBIT # 7
PAGE 142 OF 151

The Marshall Associates, Inc.

FOODSERVICE &
LAUNDRY
CONSULTANTS/DESIGNERS

TRIBUNE TOWER
409 13TH STREET SUITE 1300
OAKLAND CA 94612
415/677-1200
FAX 415/677-1210

STEVEN MARSHALL, FCSI
ELIZABETH MARSHALL
JONATHAN MARSHALL, FCSI

RECEIVED
MAY 22 2000

CALIFORNIA
COASTAL COMMISSION

May 16, 2000

Shirley S. Dettloff, Commissioner
California Coastal Commission
City of Huntington Beach
2000 Main Street
Huntington Beach, CA 92648

Dear Ms. Dettloff:

We are writing to express our support for the Treasure Island Coastal Development Permit, which has received previous approval from Coastal Commission and by the City of Laguna Beach. We support the redevelopment plans for increased public access, a public bluff top park and a five star resort community.

We would be pleased to see the Coastal Commission approve the Treasure Island CDP as proposed by the Athens Group and approved by the City of Laguna Beach.

Thank you.

Sincerely,

Steve Marshall

Steve Marshall
President

cc: Coastal Commission Staff

COASTAL COMMISSION

EXHIBIT # 7
PAGE 143 OF 151

May 19, 2000

Members, California Coastal Commission
45 Fremont Avenue, Suite 2000
San Francisco, CA 94105-2219

RECEIVED
MAY 15 2000

CALIFORNIA
COASTAL COMMISSION

RECEIVED
MAY 24 2000
CALIFORNIA
COASTAL COMMISSION

Dear California Coastal Commission members:

I am writing to express my support for the plan approved by the City of Laguna Beach for the development project at Treasure Island. As a 4th generation member of one of Orange Country's original "Pioneer Families" and as a 25-year resident of the Laguna Beach community, I feel this project is long-overdue. For over a century my family has witnessed change in Orange County. The Treasure Island project will only enhance the beauty of Laguna Beach.

Because of the previously private status, my husband and I were unable to enjoy this section of coastline when our 2 daughters were growing up. We now look forward to visiting the new resort and playing in the surrounding parklands with our young grandson. Please move forward with a vote that will offer the residents of Laguna Beach enjoyment and free access to this beautiful coastline property.

Sincerely,

Kate Tschudin

Kate Tschudin
1299 Dunning Drive
Laguna Beach, CA 92651

COASTAL COMMISSION

EXHIBIT # 7
PAGE 144 OF 151

May 18, 2000

Commissioner Sara Wan
California Coastal Commission
45 Fremont Avenue, Suite 2000
San Francisco, CA 94105-2219

RECEIVED

MAY 23 2000
RECEIVED
CALIFORNIA
COASTAL COMMISSION
MAY 24 2000

CALIFORNIA
COASTAL COMMISSION

Dear Chairperson Wan and Members of the California Coastal Commission Staff:

I am writing to express my support for the Treasure Island project in Laguna Beach. I believe this project will bring numerous benefits to Laguna Beach. I especially look forward to increased beach access and a rambling public bluff top park for South Lagunans to enjoy.

The plan proposed by The Athens Group has been thoroughly studied and reviewed. Many local residents and future visitors to Laguna Beach look forward to the development of the Treasure Island project. I urge the Coastal Commission to support the Treasure Island Local Coastal Program and let this plan move forward with no further delays.

I urge you to please think about the increased beach access, public park and significant economic benefit that the Treasure Island project will provide our community. I ask you to please vote in favor of the Treasure Island project.

Sincerely,

Jeff Cavanaugh

Jeff Cavanaugh
14 South Portola
Laguna Beach, CA 92651

cc: California Coastal Commission

COASTAL COMMISSION

EXHIBIT # 7
PAGE 145 OF 151

May 15, 2000

Ms. Anne Kramer
California Coastal Commission
P O Box 1450
Long Beach, CA 90802-4416

RECEIVED
MAY 25 2000

CALIFORNIA
COASTAL COMMISSION

Dear Ms. Kramer:

I am writing in support of the Treasure Island Coastal Development Permit and urge you to support it as well. I live in a private community in Laguna Beach known as Lagunita. Lagunita, which is made up of single-family homes, is also a beachfront community, and is located no more than a few hundred yards north of Treasure Island.

Because of this proximity, and while serving as a board member of Lagunita's Community Association, I was given the responsibility to evaluate the impact of this project on our community. I was, in fact, happy to see a referendum called for. What better way to get a second look at all of the issues and for Laguna Beach residents to validate their original thought process? The majority spoke, and, along with a unanimous approval by Lagunita's board, we enthusiastically supported the project. Since then, the Athens Group, in an effort to be as sensitive to our city as possible, has gone beyond the norm in significantly adjusting, modifying, and compromising the original plan.

We feel strongly that the City of Laguna Beach, by granting the permit, has properly and adequately evaluated all aspects of the project including the grading plan for the bluff. We feel that delaying it any further serves no useful purpose. Many people in Laguna Beach feel the project is important—some of us feel it is vital. Please join us in our desire to get it approved and underway.

Sincerely,



Tony Ciabattone
16 Lagunita Drive
Laguna Beach, CA 92651

COASTAL COMMISSION

EXHIBIT # 7
PAGE 146 OF 151

May 12, 2000

Sara Wan, Chair
California Coastal Commission
22350 Carbon Mesa Road
Malibu, CA 90265

RECEIVED
MAY 25 2000

RE TREASURE ISLAND RESORT, LAGUNA BEACH, CA CALIFORNIA
COASTAL COMMISSION

Dear Ms. Wan

I am writing to you in support of the Treasure Island Resort project proposed for development in Laguna Beach. I have a unique personal perspective: as a long-time local resident who has gained a clear understanding of the project's context by commuting past the site to work on a daily basis; as a professional land planning consultant who has closely followed the evolution of the proposed project in its entitlements phases over the past several years; and as a third generation Californian who cherishes the virtues of our coastal environment.

In my opinion, historic development patterns in South Laguna, including the subject property, serve as "text-book" examples for justifying the passage of the Coastal Act in 1976. With the exception of the Aliso Beach park improvements implemented by the County of Orange, private residential development dominates the coast between "Main Beach," in downtown Laguna and Salt Creek Beach Park, in Dana Point. Many of the parcels are gated to the total exclusion of the public. Over the years, residential construction altered or obliterated nearly all of the former bluff tops. Public parking is extremely limited, primarily available only along the shoulders of Pacific Coast Highway. While beach access stairs have been improved in some locations, the perils of high volume, high-speed traffic conditions on this roadway severely compromise public accessibility. In effect, much of the coastal environment in South Laguna remains the private domain of only those individuals whose good fortune enables them to reside within convenient walking distance of the ocean.

The existing Treasure Island trailer park, to be removed from the subject property should project approvals be sustained, has impacted the site for the past several decades. It, too, is private with manned security gates that that continue to preclude the public from accessing its spectacular shoreline. Although not as visually massive as many of its neighbors, the property has nonetheless been intensely developed with haphazardly configured sub-standard roadways and hundreds of trailers. Individual trailers historically protruded over the much of the bluff frontage having been placed on unsightly makeshift foundations and non-conforming earthen fills. Fencing, structures and foliage associated with the trailer park create a physical and visual barrier to the ocean from Coast Highway.

CALIFORNIA COASTAL COMMISSION

EXHIBIT # 7
PAGE 147 OF 151

By contrast, the proposed Treasure Island Resort is a wonderful example of implementing the spirit and objectives of the Coastal Act. The overall quality of the bluffs will not only be restored but will be visually enhanced through appropriate landscape improvements. The proposed hotel will provide a much-needed focal point for enjoyment of the coast and also contribute to the economic well being of the community and the state's tourist industry. Extensive view corridors throughout the proposed development will dramatically improve public ocean vistas from Coast Highway. Most importantly, public access will be maximized through the creation of extensive trails and bluff top parks and the conversion of private beaches to public use. This contribution of nearly one-half mile of existing private oceanfront residential property into public trails and park space is virtually unprecedented.

I strongly urge you to support the City of Laguna Beach in its approval of the Treasure Island Resort. In my experienced opinion, the issues raised by local opposition are a part of a disingenuous effort to derail this project for a self-serving "not in my backyard" agenda. The overwhelming public benefits of this project are paramount.

We should all look forward to the day when everyone will have the opportunity to enjoy this truly special piece of the California coast. Thank you for your consideration.

Sincerely,



Kenneth Edward Nilmeier
11 Blue Horizon
Laguna Niguel, California 92677

Copy: California Coastal Commission Staff

CALIFORNIA COASTAL COMMISSION

EXHIBIT # 7
PAGE 148 OF 151

Evelyn Corsinita
2013 Sequoia Street
San Marcos, CA 92029

RECEIVED
MAY 25 2000

CALIFORNIA
COASTAL COMMISSION

May 18, 2000

Commissioner Sara Wan, Chairman
California Coastal Commission
45 Fremont Avenue, Suite #2000
San Francisco, CA 94105-2219

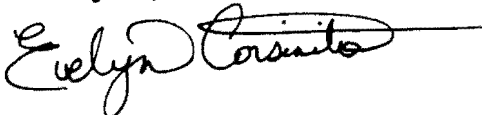
Dear Ms Wan:

I am writing in support of the proposed Resort at Laguna Beach. The Athens Group has done an excellent job revising the plan over and over again to accommodate the requests of the community members. They are sensitive to the environment and I believe they want to improve the City of Laguna Beach.

My parents live in the area so I come to the city often. We discuss this issue all the time and we cannot believe how long it taken to pass this plan. They would like to have beach access but are unable because of the trailer park that sits on the lot behind locked gates.

Will you please pass the plan this time around? It is long overdue that we improve the City of Laguna with this resort.

Thank you,



Evelyn Corsinita

Cc: Coastal Commission Staff

COASTAL COMMISSION

EXHIBIT # 7
PAGE 149 OF 151

Treasure Island Project Opposition Letters

COASTAL COMMISSION

EXHIBIT # 7
PAGE 150 OF 151

Dear Commissioners;

The Treasure Island project that you will be considering in June is not the project that the Local Coastal Program calls for—it is a *much bigger* one.

It requires more than four times the amount of earth export as the original proposal.

It includes grading of the coastal bluffs, which were supposed to be left alone.

It devotes more land to private residential uses and less to public uses than the LCP specifies.

It is massive and dense, violating the specific design policies that should have produced a plan consistent with Laguna's scale and character.

We urge you to examine these issues and then require that the project be modified to conform to the original plan.

Name: JON PACK
Address: 1170 CARTHAY DR.
NORCO, CA 92860
THIS IS MY
FAVORITE BEACH.
DON'T LET DEVELOPERS
DESTROY IT!

Dear Commissioners;

The Treasure Island project that you will be considering in June is not the project that the Local Coastal Program calls for—it is a *much bigger* one.

It requires more than four times the amount of earth export as the original proposal.

It includes grading of the coastal bluffs, which were supposed to be left alone.

It devotes more land to private residential uses and less to public uses than the LCP specifies.

It is massive and dense, violating the specific design policies that should have produced a plan consistent with Laguna's scale and character.

We urge you to examine these issues and then require that the project be modified to conform to the original plan.

Name: Marion Pack
Address: 30832 Duffwood Dr. 17 2000
Laguna Beach, CA 92651
VED
ast Region
RNIA
COASTAL COMMISSION

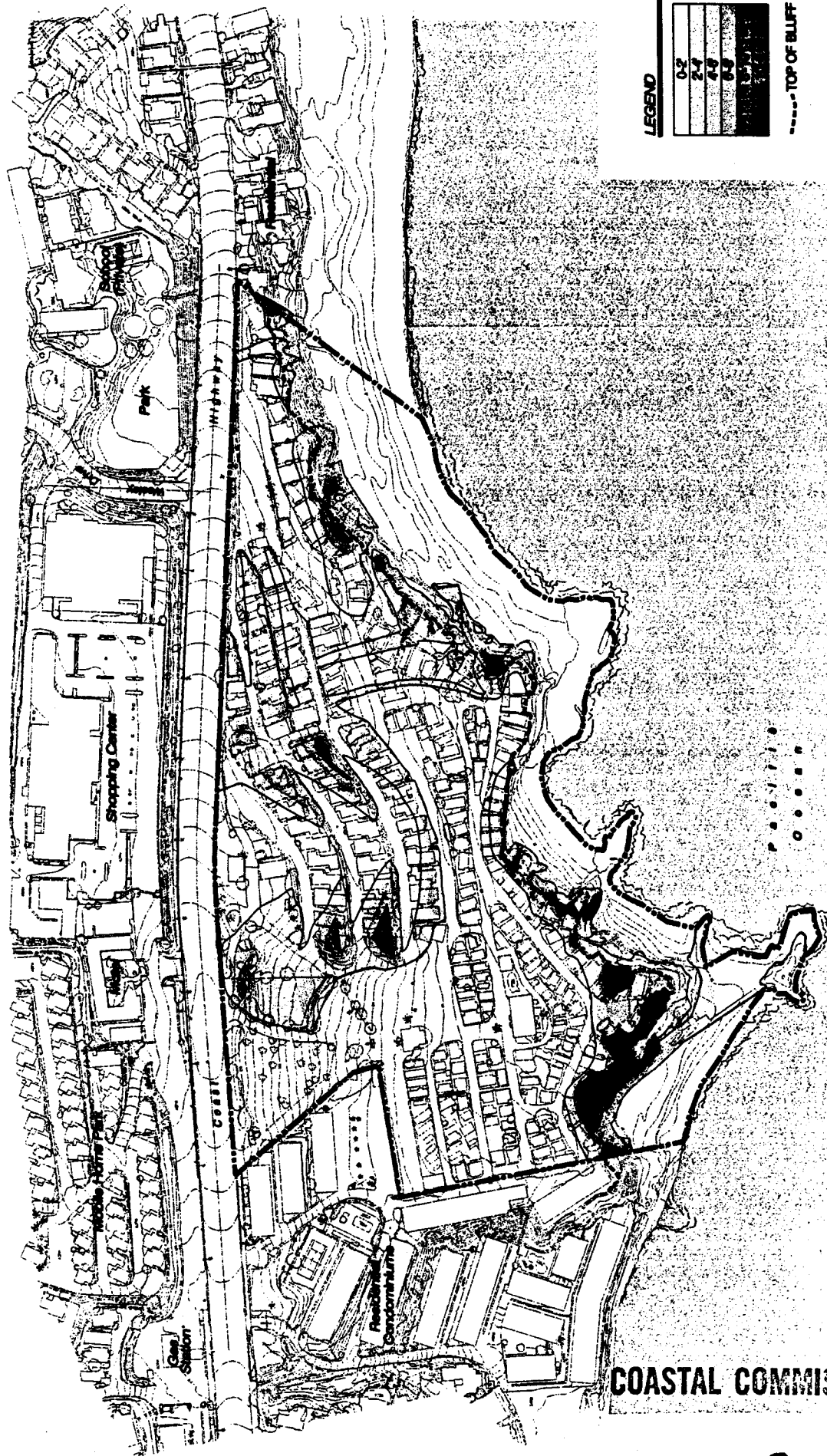


Figure 10.7-4
DEPTH OF EXISTING FILLS
(CURRENT vs. 1937 TOPOGRAPHY)

COASTAL COMMISSION

Treasure Island
LAGUNA BEACH, CALIFORNIA
Local Coastal Program

CALIFORNIA COASTAL COMMISSION

45 FREMONT, SUITE 2000
SAN FRANCISCO, CA 94105-2219
VOICE AND TDD (415) 904-5200
FAX (415) 904-5400

RECEIVED
MAY 23 2000



CALIFORNIA
COASTAL COMMISSION

22 May 2000

MEMORANDUM

To: Anne Kramer, Coastal Program Analyst
From: Mark Johnsson, Senior Geologist
Re: A-5-00-78, A-5-00-79 (Treasure Island); geotechnical review

This memo presents my evaluation of the geotechnical issues surrounding the proposed development for Five Star Resort at "Treasure Island," Laguna Beach. In preparing this evaluation, I reviewed the following documents:

- 1) "Geotechnical Evaluation in support of specific plan/draft EIR Treasure Island Redevelopment Project, Tentative Tract No. 15497, Laguna Beach, California" by AGRA Earth and Environmental, signed by Scott Kerwin and Dugald Campbell, dated 15 May 1997.
- 2) "Final Environmental Impact Report for Treasure Island Destination Resort Community" by LSA Associates, dated 3 June 1998.
- 3) Geotechnical review letter "Bluff Slope Conditions, Treasurer [sic] Island Redevelopment Project, Laguna Beach, CA," by AGRA Earth and Environmental, signed by Scott Kerwin and Brian Constant, dated 2 November 1998.
- 4) Geotechnical review letter "Consultation regarding fill near top of bluff" by LAW/CRANDALL, signed by Susan Kirkgard and Martin Hudson and dated 2 February 2000.
- 5) Geologic Map and Cross-Sections prepared by LAW/CRANDALL, dated 8 March 2000 through 3 May 2000.
- 6) Topographic map prepared by The Keith Companies, showing limits of proposed grading and 45% line defining bluff edge, undated.
- 7) Geotechnical review letter "Supplemental Consultation: bluff retreat rate" by LAW/CRANDALL, signed by Tom Kelty and Martin Hudson and dated 19 April 2000.

COASTAL COMMISSION

DATE # 9
PAGE 1 OF 4

- 8) Geotechnical review "Supplemental Consultation: stability of walkway" by LAW/CRANDALL, signed by Tom Kelty and Martin Hudson and dated 19 April 2000.
- 9) Geotechnical review "Supplemental Consultation: Stability of walkway" by LAW/CRANDALL, signed by Armen Gaprelian, Susan Kirkgard, and Martin Hudson and dated 15 May 2000.
- 10) Topographic map showing 1937 contours superimposed on reference (6), supplied b LAW/CRANDALL, undated.

On 6 April 2000 I met with the applicant's agent Nancy Lucast, their consultants from LAW/CRANDALL, The Keith Companies, The Athens Group, and John Montgomery representing the City of Laguna Beach. Also present at this meeting was Coastal Commission Coastal Engineer Lesley Ewing, and other Coastal Commission staff (by telephone). Various photographs, maps, and other documents were supplied to us at that meeting, which also went into this review. I visited the site on 5 May 2000, where I was able to have additional consultations with Martin Hudson (LAW/CRANDALL), John Mansour, Sean Finnegan (both of The Athens Group), and John Montgomery, among others. Finally, I have discussed these issues with the Commission's Coastal Engineer, Lesley Ewing, who also has reviewed many of the documents referenced above.

In general, I concur with the applicants' geotechnical consultants in that the proposed development, properly conditioned, will neither create nor contribute significantly to erosion, geologic instability or destruction of the site or surrounding area. The principal structures should not be at risk from erosion over their anticipated economic lifespan (75 years). There are, however, a number of specific conditions that need to be applied to the development to ensure that this is the case. Specific areas of concern are as follows:

- 1) The bluff edge, as defined by the LCP, is the line at which the gradient reaches 45%; this line has been determined by The Keith Companies and is shown on reference (6), above. Grading extends beyond this line in several areas, constituting grading of the bluff face. Although this is not inconsistent with the LCP, the edge of bluff should be the *original* bluff edge as defined above and as indicated on reference (6), not a new edge created artificially through grading.
- 2) LAW/CRANDALL estimates a bluff retreat rate ranging from 0.25 to 3.5 inches per year, based on comparison of topographic contours derived from 1937 and 1997 surveys. The primary structure closest to the bluff edge, as defined above, is a corner of the main hotel building near it's southern end. This corner is located approximately 35 feet from the bluff edge, near a part of the bluff where some of the highest retreat rates were measured. The highest calculated rate of retreat results in

about 22 feet of retreat in 75 years. Although this amount of retreat would not place the structure at risk, it leaves little margin for safety if the calculated retreat rate is in error or if bluff retreat accelerates. Further, bluff retreat at this location would certainly threaten the ADA walkway, and with the existing building setback there is very little room for its relocation. Redesign of this corner of the hotel to increase blufftop setback might be appropriate.

- 3) The slope stability analyses indicate that portions of the upper bluff, especially those where the existing artificial fill is at its thickest, are likely to experience surficial failures and retreat rates more rapid than the 0.25 to 3.5 inches per year calculated above, which was calculated at the 30 and 50 foot contours, below the level of most of the artificial fill. While such surficial failures are not likely to threaten principal structures within their economic lifetime, they will very likely threaten the park, the ADA walkway, access ramps, and drainage control structures. Such failures should be anticipated, and structures that may be threatened by them should be designed so that they may be easily moved landward as the bluff edge encroaches upon them. The CDP should be conditioned to prohibit the construction of shoreline protective devices to protect secondary structures.
- 4) Several retaining walls of various types are found in the upper bluff around the property. These seem to have been designed to retain artificial fill and to allow construction closer to the bluff edge than would otherwise have been possible. Over time, these retaining walls are likely to require maintenance. If they are not maintained and they fail, surficial instability will result in a rapid retreat of the bluff edge, which may threaten auxiliary structures as described above. A decision must be made as to whether these structures should be retained and maintained, or whether they should be removed as part of development and stability addressed through grading, recompaction, or other means.
- 5) The grading plan calls for nearly twice the grading approved in the LCP, which will result in over 200,000 cubic yards of cut in excess of fill. This grading cannot be considered remedial under the LCP, as it removes substantial amounts of natural materials (terrace deposits and bedrock) in addition to artificial fill.
- 6) To answer questions that have arisen in conversations that I have had with staff, I offer the following discussion regarding grading and other issues revolving around the creation of the park, it's access walkway, and the bluff edge. The grading along the bluff edge is a minor part of the entire grading plan proposed. Nevertheless, it is of concern because it has the greatest impact from a landform alteration perspective. The grading along the bluff edge is necessary if the walkway is to be graded so as to provide access for emergency vehicles and to meet ADA requirements. Additional blufftop grading is being performed to improve drainage, directing it away from the bluff edge, which is probably justifiable from the viewpoint of increasing site stability. Some additional grading does appear to be mostly cosmetic in nature.

involves the smoothing of former building pads to eliminate a "stairstep" appearance to the park. While this grading is more difficult to justify from a "landform alteration" point of view, it involves mostly artificial fill and is minor in scope. Any alternatives for creating a "safe and useable park" also involve cut and fill. An elimination of net export from this area is perhaps feasible, but would likely result in greater landform alteration than grading in the form of cut, and export of excess material. Finally, I see no reason why the access ramps will require armoring in the future, and it is appropriate to condition the permit such that this is the case. Retreat rates of the lower part of the bluff are very low, and although the upper bluff may experience some surficial slumping, resulting in limited bluff retreat, all of the park structures can be constructed such that they may be moved landward rather than protected by shoreline structures or retaining walls.

I hope that this evaluation is useful; please do not hesitate to contact me if you have further questions.

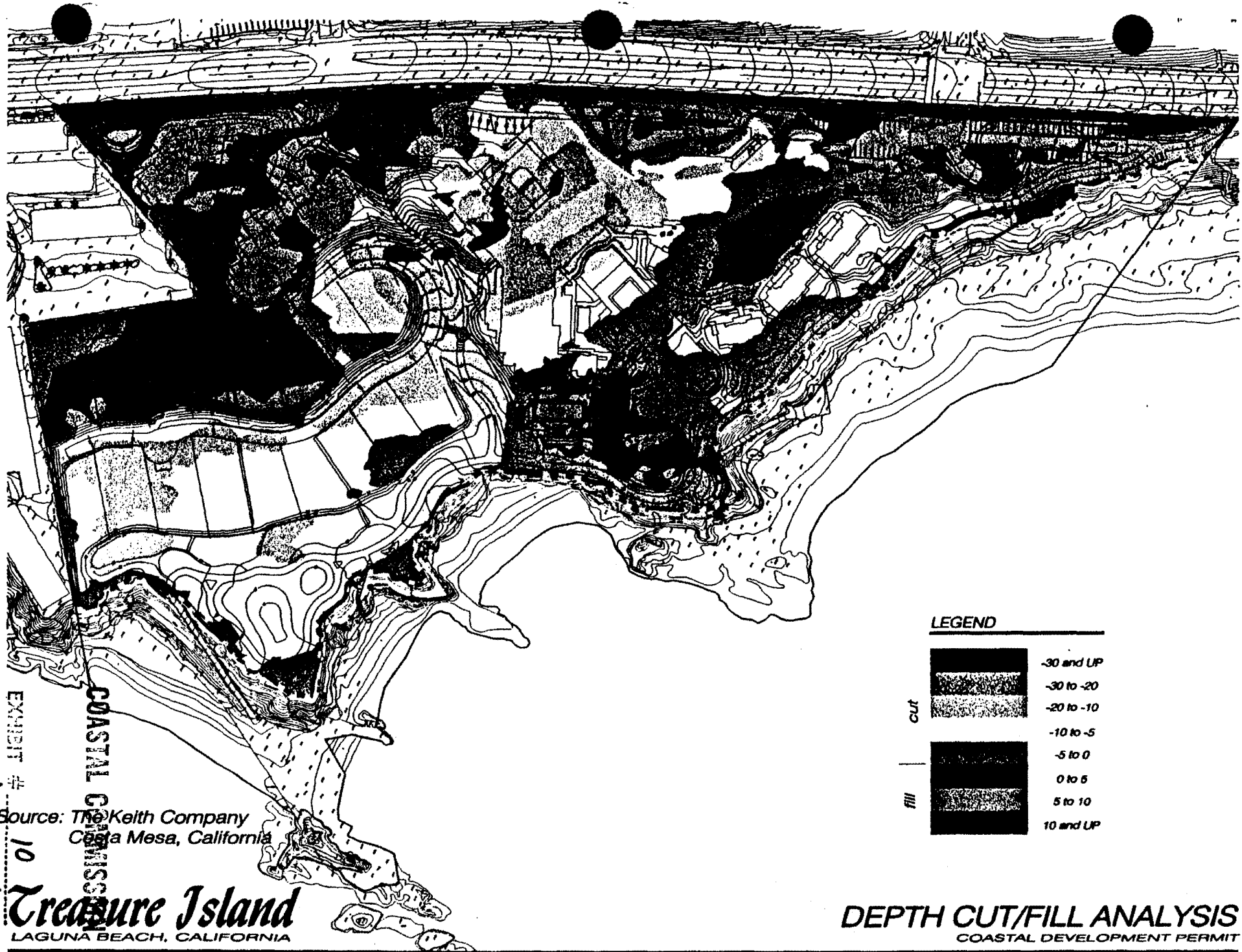
Sincerely,




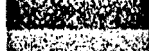
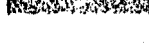





Mark Johnsson
Senior Geologist

COASTAL COMMISSION

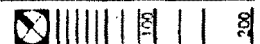
EXHIBIT # 9
PAGE 4 OF 4



LEGEND

cut		-30 and UP
		-30 to -20
		-20 to -10
		-10 to -5
		-5 to 0
fill		0 to 5
		5 to 10
		10 and UP

DEPTH CUT/FILL ANALYSIS COASTAL DEVELOPMENT PERMIT



MARCH 2000

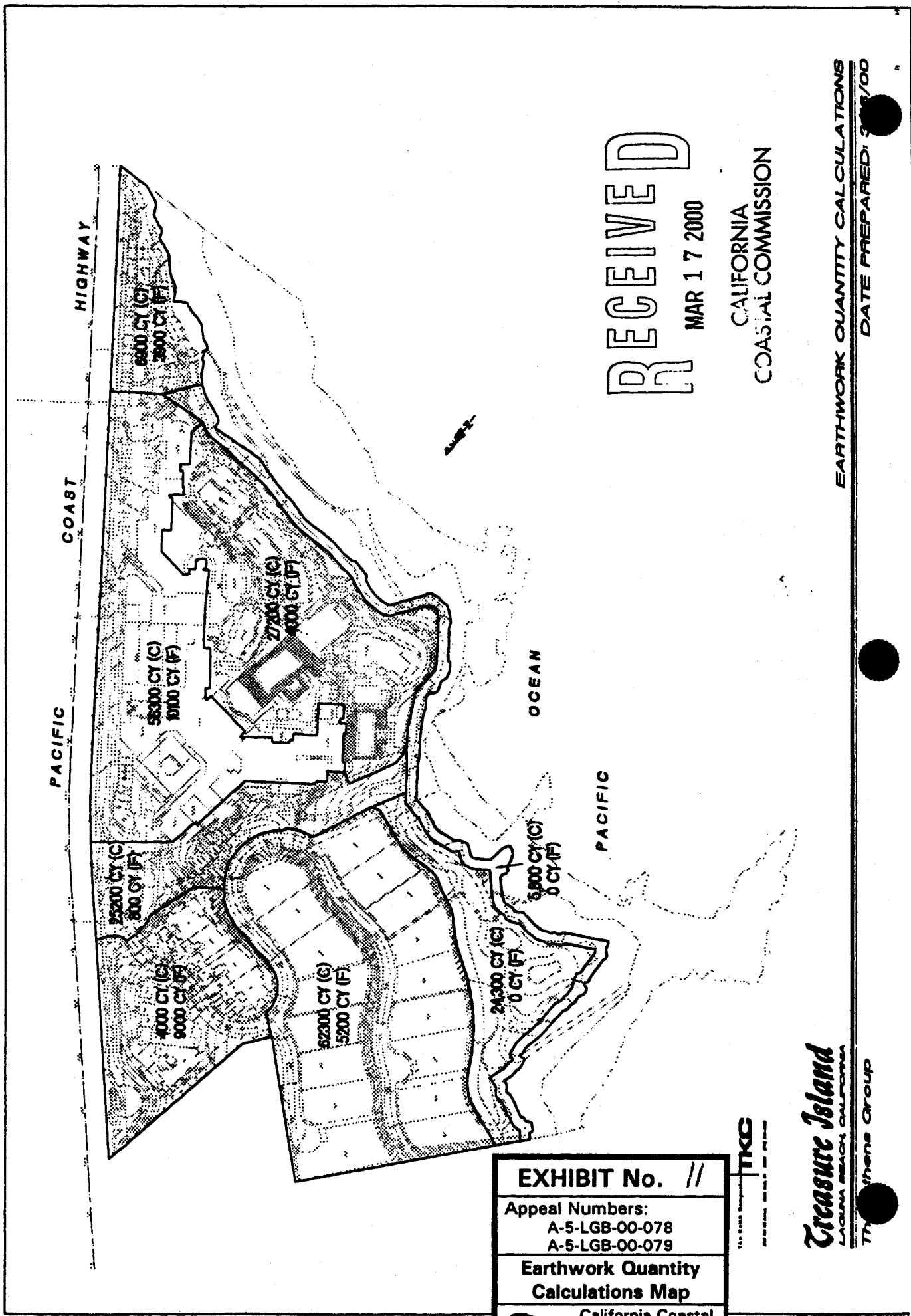
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PAGE 1 OF 1

Source: The Keith Company
Costa Mesa, California

Treasure Island
LAGUNA BEACH, CALIFORNIA

The Athens Group



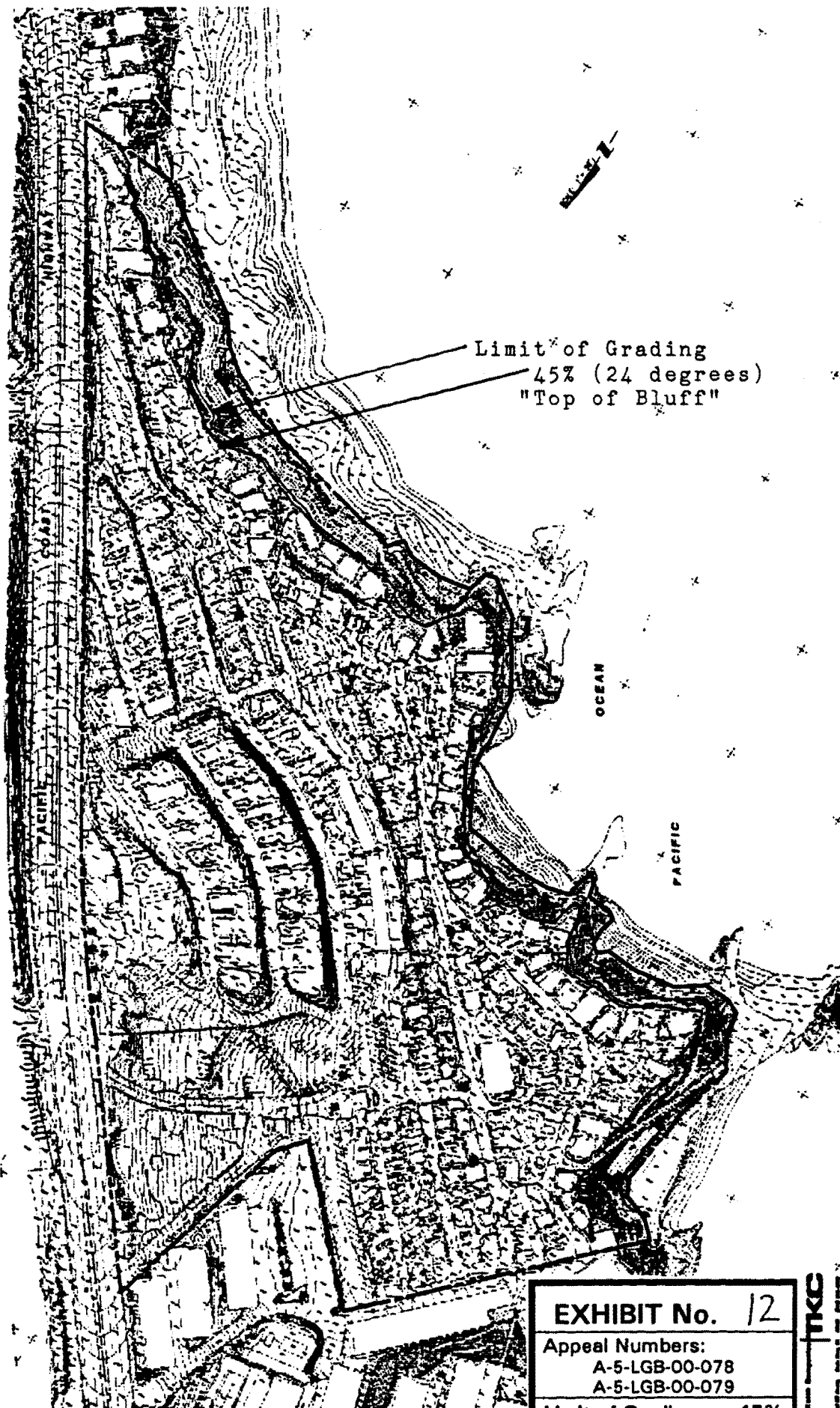


EXHIBIT No. 12

Appeal Numbers:

A-5-LGB-00-078

A-5-LGB-00-079

Limit of Grading vs. 45%
Blufftop Delineation

California Coastal
Commission

THE TRUSS COMPANY
INCORPORATED
1900

Treasure Island
LAGUNA BEACH, CALIFORNIA

The Athens Group

LAW

LAWGIBB Group Member

March 24, 2000

Mr. John Montgomery
City of Laguna Beach
505 Forest Avenue
Laguna Beach, California 92651

Subject: Consultation Regarding Grading at Edge of Bluff
Treasure Island Redevelopment Project
Laguna Beach, California
Law/Crandall Project 70131-0-0029.0002

Dear Mr. Montgomery:

We have prepared this letter regarding the proposed grading at the edge of the bluffs at the site of the proposed Treasure Island Redevelopment Project. In our professional opinion, the proposed grading at the blufftop is the minimum necessary to meet the parameters set in The Local Coastal Program (Drainage, Bluff, Stabilization, and Public Safety). We have been furnished with cross sections and plans by The Keith Companies for the project. We have performed a geotechnical investigation of the site, as presented in our report dated March 24, 2000, including geotechnical explorations at the site and geologic reconnaissance of the bluffs. We also previously submitted a letter dated February 2, 2000 regarding the fill conditions at the top of the bluff.

The professional opinions presented in this letter have been developed using that degree of care and skill ordinarily exercised, under similar circumstances, by reputable geotechnical consultants practicing in this or similar localities. No other warranty, expressed or implied, is made as to the professional advice included in this letter.

As part of previous undocumented grading, artificial fill was placed at the edge of the bluff. The artificial fill, where exposed on the bluff face, is locally eroded and unstable. Accelerated erosion of the fill materials that are exposed near the top of the bluff is evident in many areas. The fill at the site is of low quality and would not be considered certified fill. Based upon our observations, it is highly unlikely that the artificial fill has been properly engineered. It appears that the height of the original bluff was raised in most areas using uncertified fill materials.

Construction of a walkway near the top of the bluff, as required by the LCP, is currently proposed and will be for pedestrian use, as well as emergency vehicles. For the support of the walkway, and for increased surficial stability of the bluff for public safety, we have recommended that the existing fill near the edge of the bluff be excavated. The recommended fill removal will increase the global stability of the bluff by reducing the weight on top of the natural materials, and will increase the surficial stability of the slope.


Based on our recommendations, the grading plans have been prepared to remove the minimum amount of artificial fill near the edge of the bluff, resulting in increased stability for the bluff and the recommended safety and support for the walkway.

Please call if there are any questions regarding this letter.

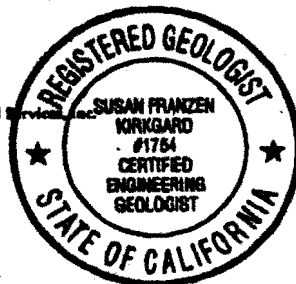
Sincerely,


LAW/CRANDALL

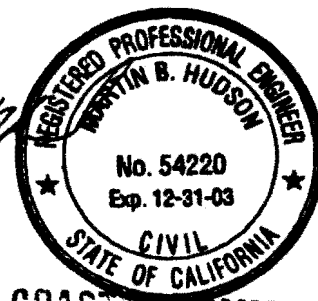
A Division of Law Engineering and Environmental Services, Inc.


Susan F. Kirkgard
Senior Engineering Geologist

enggeo\99-prop\00292102.doc\MBH:bef
(2 copies submitted)




Martin B. Hudson, Ph.D.
Principal Engineer



COASTAL COMMISSION

Law/Crandall, A Division of Law Engineering and Environmental Services, Inc.
200 Citadel Drive • Los Angeles, CA 90040-1554
323-888-5300 • Fax 323-721-6700

EXHIBIT # 13
PAGE 1 OF 1

March 24, 2000

To: Mr. John Montgomery
Assistant Director, City of Laguna Beach
505 Forest Avenue
Laguna Beach 92651

Re: Engineer Plans at Treasure Island

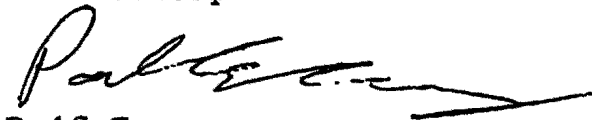
This letter serves to reference the engineering plans as it relates to the blufftop at Treasure Island. It has been our intention to minimize the amount of grading along the bluff given the following requirements set forth in the Local Coastal Program:

1. Provide ADA Access along the entire length of the park
2. Provide emergency access to service the park and beach
3. Park to be designed such that the drainage be directed on site as opposed to over the bluff
4. Remove trailers and minimize remedial grading necessary provide safe blufftop condition
5. Provide a safe and usable public park

It is the Keith Companies opinion that the current engineering plans reflect the minimum grading necessary to meet the above stated objectives. We welcome any questions or comments you may have.

Sincerely,

The Keith Companies



Paul S. Carey
Project Manager

Costa Mesa Division
P.O. Box 25127
Santa Ana
California 92799-5127

2955 Red Hill Avenue
Costa Mesa
California 92626-5923

T: 714.540.0800
F: 714.668.7026
www.keithco.com

COASTAL COMMISSION

EXHIBIT # 14
PAGE 1 OF 1



March 24, 2000

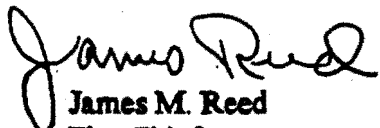
To: John Montgomery

REFERENCE: FIRE ACCESS AT TREASURE ISLAND

This is to reconfirm that the City of Laguna Beach Fire Department has completed a review of the Treasure Island development as it relates to emergency access within the site. We concur that the current location of the path along the park accommodates both the needs of the Department as well as the requirements set forth in the Local Coastal Plan. The associated grading will be necessary to create a structurally sound pathway to accommodate the 40,000-pound trucks servicing the property. We have given our standard requirements to both the civil and soils engineers for their use in designing the park.

We hope this is of use in your processing and please feel free to contact me should you have any questions or comments.

Sincerely,

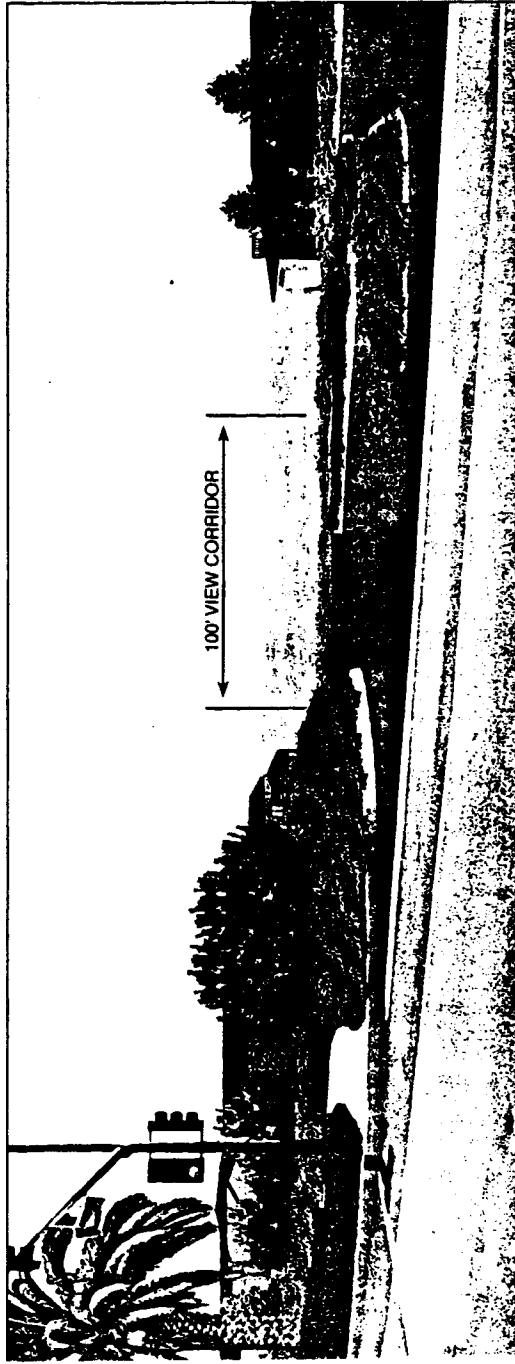

James M. Reed
Fire Chief

COASTAL COMMISSION

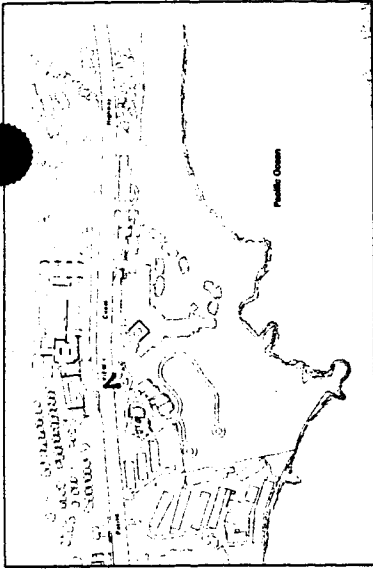
EXHIBIT # 15
PAGE 1 OF 1



Existing



Proposed



KEYMAP



COASTAL COMMISSION

Crenshaw Island
AGUNTA BEACH, CALIFORNIA

The Athens Group

#

1

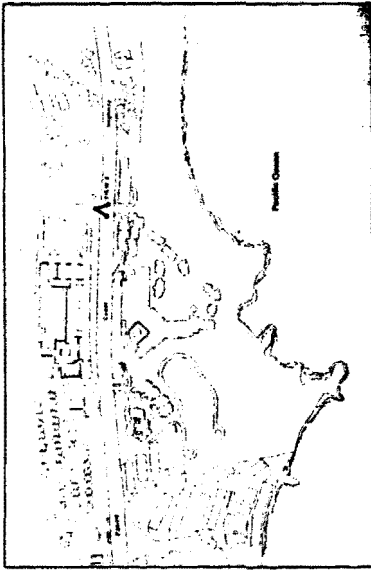
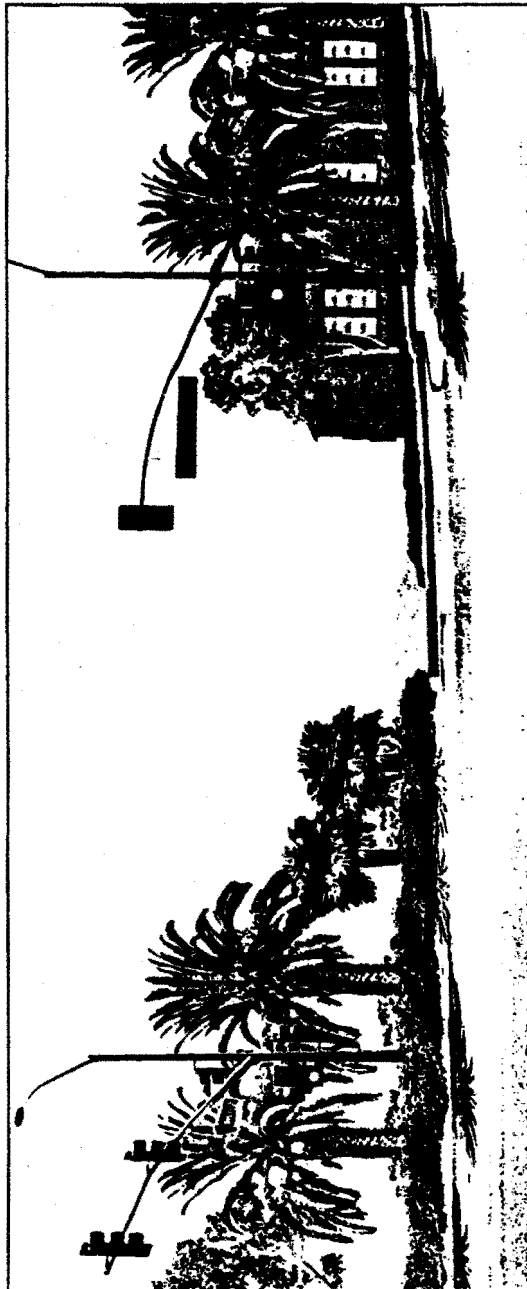
16

OF 3

VIEW 1

COASTAL DEVELOPMENT PERMIT

FORM



COASTAL COMMISSION

Treasure Island
AGUNA BERRY, CALIFORNIA

The Athens Group

#1

2

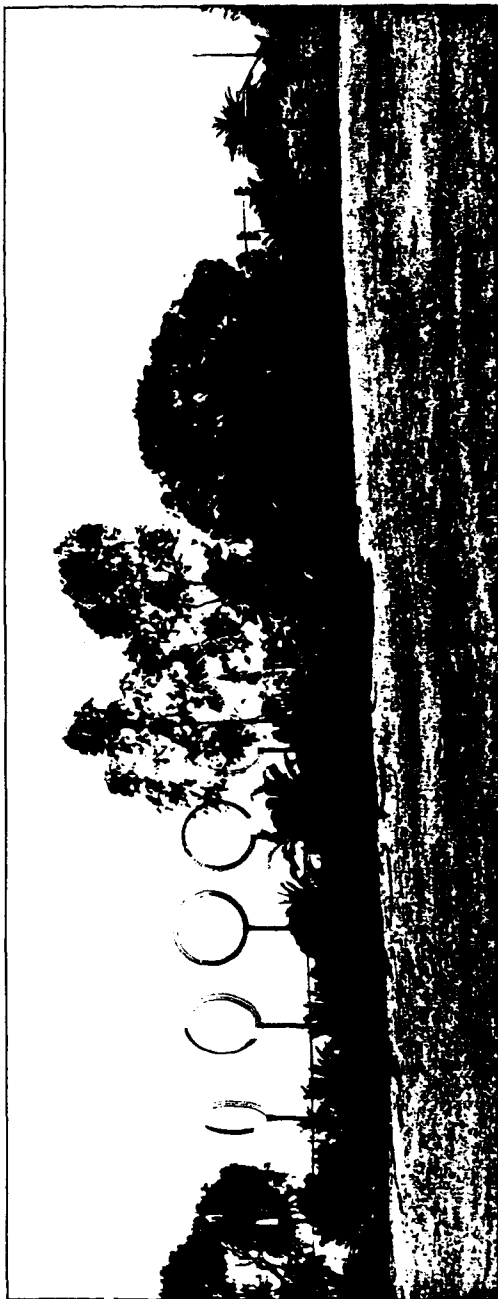
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OF 3

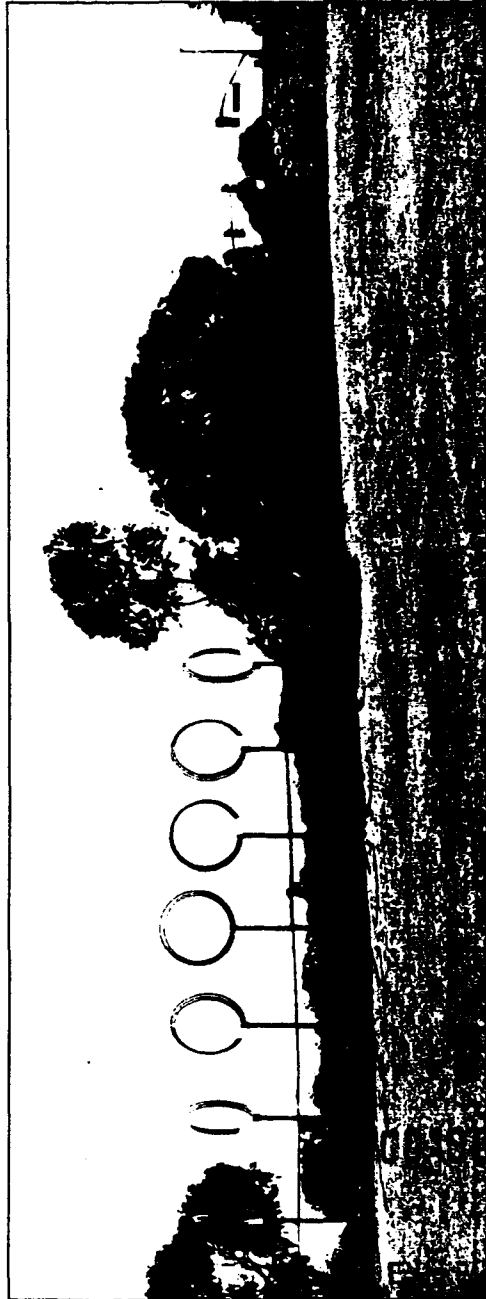
VIEW 2

COASTAL DEVELOPMENT PERMIT

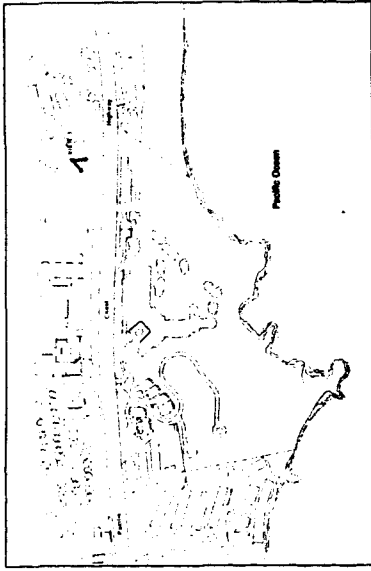
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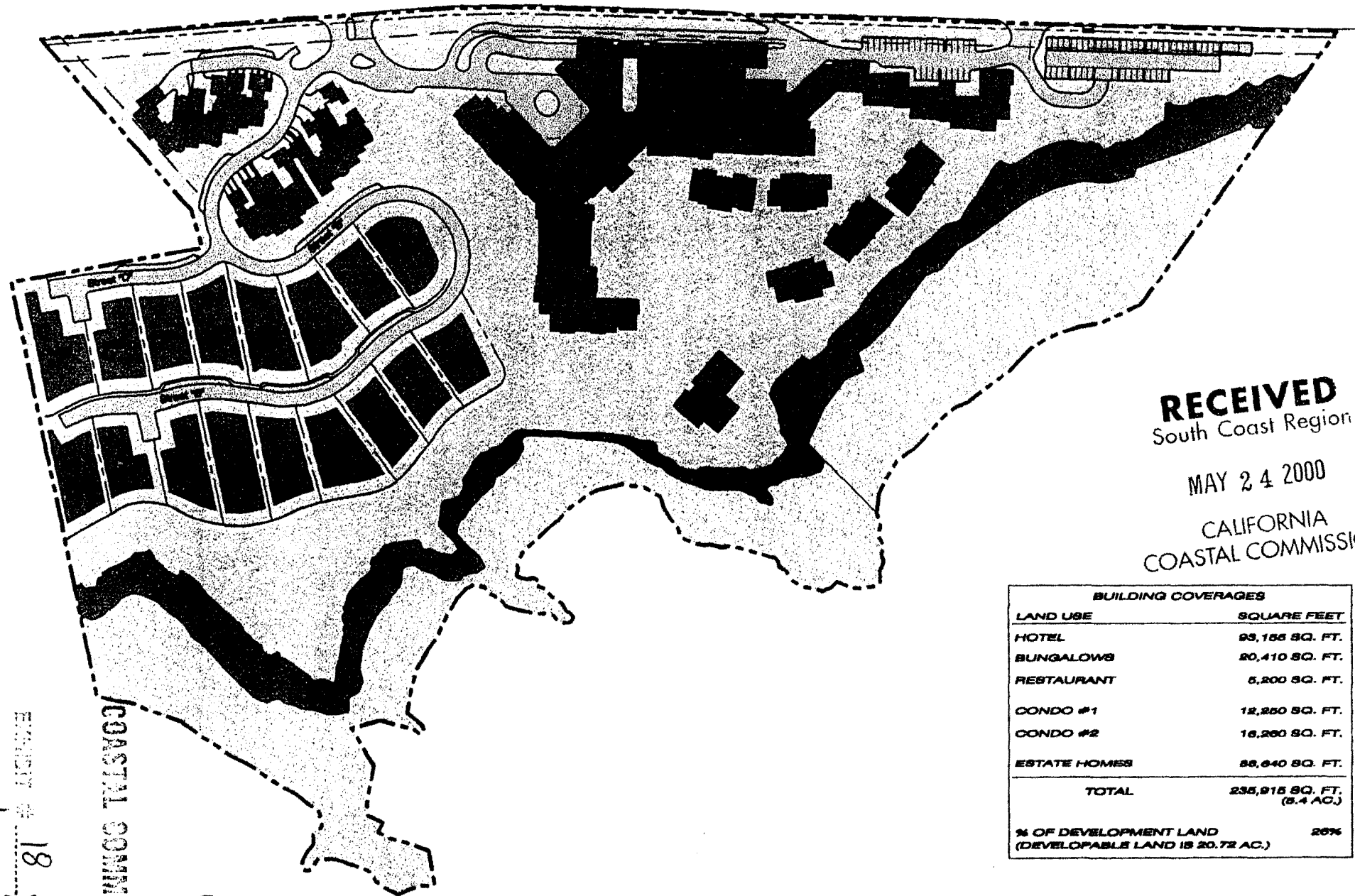
Existing



Proposed



KEYMAP



RECEIVED
South Coast Region

MAY 24 2000

CALIFORNIA
COASTAL COMMISSION

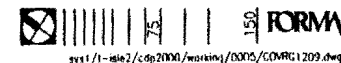
BUILDING COVERAGES	
LAND USE	SQUARE FEET
HOTEL	93,155 SQ. FT.
BUNGALOWS	20,410 SQ. FT.
RESTAURANT	5,200 SQ. FT.
CONDO #1	12,260 SQ. FT.
CONDO #2	16,260 SQ. FT.
ESTATE HOMES	55,640 SQ. FT.
TOTAL	235,915 SQ. FT. (5.4 AC.)
% OF DEVELOPMENT LAND (DEVELOPABLE LAND IS 20.72 AC.)	
	26%

EXHIBIT # 18
PAGE 1 OF

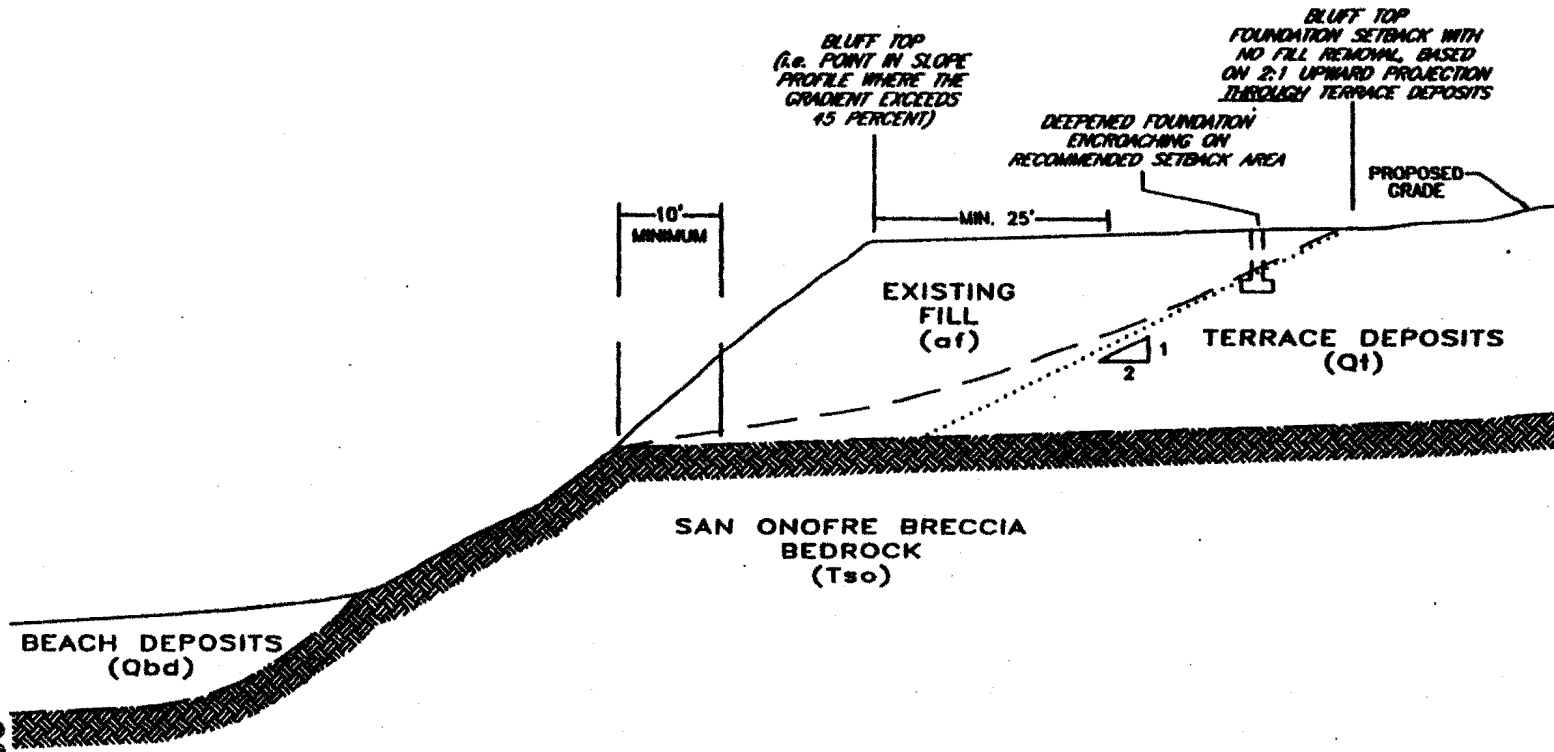
Treasure Island
LAGUNA BEACH, CALIFORNIA

The Athens Group

APPROVED CDP COVERAGE
COASTAL DEVELOPMENT PERMIT



sys1/1-mie2/cdp2000/working/DOCS/CDP/C1209.dwg



NOTE:
 1) A MINIMUM HORIZONTAL FOUNDATION SETBACK OF 25 FEET FROM THE BLUFF TOP/SLOPE IS RECOMMENDED, EXCEPT IN THOSE AREAS WHERE EXCEEDED BY THE SETBACK CRITERIA SHOWN ABOVE. ALL PROPOSED FOUNDATIONS SHOULD BE FOUNDED BELOW OR BEYOND THE 2:1 SETBACK PROJECTION. AS SHOWN ABOVE, STRUCTURES ENCROACHING ON THE SETBACK AREA WILL REQUIRE DEEPEMED FOUNDATIONS EXTENDING BELOW THE 2:1 SETBACK PROJECTION AND BEYOND THE MINIMUM HORIZONTAL SETBACK OF 25 FEET. SITE SPECIFIC DESIGN ANALYSIS WILL BE REQUIRED FOR PROPOSED FOUNDATIONS ENCROACHING ON THE RECOMMENDED SETBACK AREA.

Source: AGRA Earth & Environmental, Inc.

Figure 4.1.11

April 19, 2000

Ms. Lesley Ewing
California Coastal Commission
45 Fremont, Suite 2000
San Francisco, California 94105-2219

RECEIVED
APR 20 2000

CALIFORNIA
COASTAL COMMISSION

Subject: **Supplemental Consultation
Stability of Walkway
Treasure Island Redevelopment Project
Law/Crandall Project 70131-0-0029.0002.0006**

Dear Ms Ewing:

This letter presents our opinion regarding the bluff stability and the stability of the walkway proposed to be constructed near the ocean bluff. This consultation was requested by the staff of the California Coastal Commission.

As part of previous undocumented grading, artificial fill was placed at the edge of the existing bluff. The existing artificial fill, where exposed on the bluff face, is locally eroded and unstable. The existing fill at the site is of low quality and would not be considered certified fill.

Construction of a walkway near the top of the bluff is currently proposed and will be for pedestrian use, as well as for emergency vehicles in accordance with the Local Coastal Program. The location of the walkway is shown on Figure 1, Plot Plan. Grading of some of the existing artificial fill at the top of the bluff is currently proposed to be performed for drainage, for ADA access, and to provide a fully useable park. However, there will remain some areas of uncertified fill with a thickness of more than 5 feet beneath the proposed walkway. In these areas, which are estimated to include the areas shown on Figure 1, we recommend the use of 18-, 24-, or 30-inch diameter drilled piles to support the walkway.

Structurally Supported Walkways

In areas of thick existing fill, where excavation and recompaction would be impracticable, walkways may be structurally supported on drilled cast-in-place concrete piles. The downward and upward capacities of 18-, 24-, and 30-inch-diameter drilled piles are presented in Figure 2, Drilled Pile Capacities, as a function of penetration into the natural soils. Dead-plus-live load capacities are shown; a one-third increase may be used for wind or seismic loads. The capacities presented are based on the strength of the soils. As discussed below, we recommend a 10-foot minimum embedment of the piles into the natural materials. The compressive and tensile strength of the pile sections should be checked to verify the structural capacity of the piles.

COASTAL COMMISSION

Piles in groups should be spaced at least $2\frac{1}{2}$ diameters on center. If the piles are so spaced, no reduction in the downward capacities need be considered due to group action.

Settlement

We estimate the settlement of the walkway supported on drilled piling to be less than $\frac{1}{2}$ inch. Differential settlement between adjacent piles is estimated to be less than $\frac{1}{4}$ inch.

Lateral Loads

Lateral loads may be resisted by the piles. The soils adjacent to a 18-inch-diameter pile, with at least 10 foot embedment into the native soils, can resist horizontal loads imposed at the top of the pile of up to 15,000 pounds. The lateral resistance of other sizes of piles may be assumed to be proportional to the diameter.

In calculating the bending moment in a pile, the lateral load imposed at the top of the pile may be multiplied by a moment arm of 5 feet. For design, it may be assumed that the maximum bending moment will occur near the top of the pile and that the moment will decrease to zero at a depth of 20 feet below the pile cap.

Slope Stability Analyses

To evaluate the stability of the bluff slope in areas where existing artificial fill thicker than 5 feet is estimated to be left in place after the proposed grading, a two-dimensional limit equilibrium analysis was performed using the computer program STABL6H (Van Allen, 1999). Sections 1-1' and 2-2' are shown in Figure 3, at the locations indicated in Figure 1. The results of the slope stability analysis are presented in Appendix A, Slope Stability Analyses.

The shear strengths of the existing artificial fill and the native materials used in the slope stability analyses were developed based on the results of direct shear tests performed on undisturbed samples of the natural materials obtained from our exploratory borings. The direct shear test data and relevant boring logs are presented in Appendix B, Current Explorations and Laboratory Tests. Based on the results of the explorations and laboratory tests, the estimated shear strengths of the existing artificial fill and the native materials are summarized on Figures A-1 through A-4 in Appendix A.

The results of our slope stability analyses (presented in Figures A-1 through A-4) indicate that there could be continued surficial failures in the existing artificial fill materials. However, if the recommended mitigation measures involving drainage are implemented as proposed by the project, then the risk of continued surficial failures in the artificial fill materials will be greatly reduced. Nevertheless, deep-seated failures that extend beyond the walkway are not anticipated (factors of safety greater than 1.5). The integrity of a pile-supported walkway will not be compromised as discussed below. To provide sufficient embedment of the piles, we recommend that piles be extended at least 15 feet into the natural materials; this will provide 10 feet of embedment of the piles below the potential failure surface having a factor of safety of 1.5.

COASTAL COMMISSION

April 19, 2000

We have also performed lateral pile capacity analyses based on the conservative assumption of a failure within the fill materials to the seaward side of the walkway. For a minimum pile embedment depth as discussed above, lateral deflection of the walkway supported on pile foundations should be on the order of ½ inch or less in the event of a surficial failure within the existing fill materials. We also recommend that in areas of thick existing artificial fill that the fence proposed to be constructed on the seaward side of the pathway be placed directly on the edge of the walkway.

The professional opinions presented in this letter have been developed using that degree of care and skill ordinarily exercised, under similar circumstances, by reputable geotechnical consultants practicing in this or similar localities. No other warranty, expressed or implied, is made as to the professional advice included in this letter.

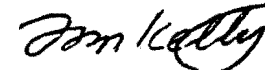


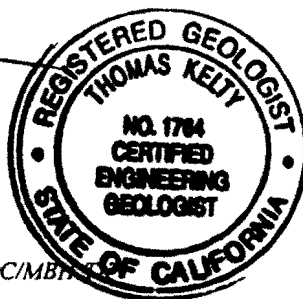
Please call if you have any questions regarding this letter or if we can be of further assistance.


Sincerely,

LAW/CRANDALL

A Division of LAW Engineering and Environmental Services, Inc.


Tom Kelty, Ph.D.
Project Geologist




Martin B. Hudson, Ph.D.
Principal Engineer
Project Manager



enggeo\2000-proj\00291108b.DOC/MBH
(4 copies submitted)

cc: The Athens Group
Attn: Mr. Jon Richards

- Figure 1: Plot Plan
- Figure 2: Drilled Pile Capacities
- Figure 3: Geologic Sections

- Appendix A: Slope Stability Analyses
- Appendix B: Current Explorations and Laboratory Tests

COASTAL COMMISSION

April 19, 2000

Ms. Lesley Ewing
California Coastal Commission
45 Fremont, Suite 2000
San Francisco, California 94105-2219

RECEIVED
APR 20 2000

CALIFORNIA
COASTAL COMMISSION

Subject: **Supplemental Consultation
Bluff Retreat Rate
Treasure Island Redevelopment Project
Law/Crandall Project 70131-0-0029.0002.0005**

Dear Ms. Ewing:

As requested, we are writing this letter to present our opinion regarding the bluff retreat due to wave action and surface runoff of water. This issue was brought up by you and staff of the California Coastal Commission in Long Beach.

The annual rate of bluff retreat at the Treasure Island Redevelopment Project site was evaluated for the 50-year period with historical records, from 1937 to 1997. The rates of bluff retreat or erosion were determined by comparing the 1937 to the 1997 topographic maps. Based on our comparison, the average total erosion of any part of the bluff during the given time period has ranged from 0.25 inch to 3.5 inches per year. Although these rates of erosion are averaged over a 50-year period, most of the erosion probably occurred during discrete periods of heavy precipitation and water runoff from severe storms.

The erosion along the bluff appears to be strongly related to location with respect to surface runoff and the earth materials being eroded. The greatest amount of erosion along the bluff during the 50-year evaluation period (1937 to 1997) has occurred where surface water was allowed to drain across the bluff face uncontrolled. Based on our comparison of the 1937 and 1997 topographic maps, about 20% of the bluff has experienced more than 0.5 inch per year of retreat. Most of these areas correspond to areas of poorly contained surface runoff. The most severe area of erosion has occurred along an isolated portion of the southern part of the property where a drainage feature crosses the bluff. In this area the bluff face has retreated 15 feet from 1937 to 1997 due to erosion from uncontrolled surface water runoff.

The second factor that has influenced the average erosion rate is the type of earth material that underlies the bluff face. It appears that the San Onofre Breccia is erosion resistant to shoreline wave erosion or erosion from surficial water runoff. The San Onofre Breccia has undergone less than 0.25 inch per year of erosion over the 50-year evaluation period (totaling 1 foot within 50 years). This is illustrated by the observation that there has been very little retreat of the bluff base in areas in which the San Onofre Breccia forms the lower part of the bluff. Furthermore, because the lower part of the bluff is exposed to wave erosion, bluff retreat caused by wave erosion appears to be much less important than erosion caused by surficial water runoff. The resistance of the San Onofre Breccia to wave erosion is derived from the well lithified, poorly bedded character of this

April 19, 2000

formation at the site. In contrast to San Onofre Breccia, the terrace deposits and artificial fill are much less resistant to erosion. The terrace deposits and artificial fill are much less lithified than the San Onofre Breccia. As a result, the greatest amounts of erosion over the 50-year evaluation period were measured in areas where the bluff is composed of terrace deposits and artificial fill and uncontrolled drainage has been allowed to flow over the bluff face.

Based on our evaluation, it is our opinion that the erosion of the bluff can be minimized to less than 0.25 inch per year if proper controls are placed on surface water runoff. Controls include the grading of the top of the bluff to direct water away from the bluff face. Also, erosion can be minimized by placing appropriate plants on the bluff face as proposed by the project habitat restoration program. Therefore, as approved by the City of Laguna Beach and California Coastal Commission, a 45-foot building setback is adequate for the proposed development.

The professional opinions presented in this letter have been developed using that degree of care and skill ordinarily exercised, under similar circumstances, by reputable geotechnical consultants practicing in this or similar localities. No other warranty, expressed or implied, is made as to the professional advice included in this letter.

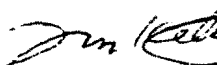


Please call if you have any questions regarding this letter or if we can be of further assistance.

Sincerely,

LAW/CRANDALL

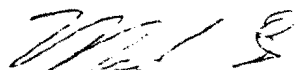
A Division of LAW Engineering and Environmental Services, Inc.


Tom Kelty, Ph.D.

Project Geologist



enggeo\2000-proj\00291107c.DOC
(4 copies submitted)



Martin B. Hudson, Ph.D.
Principal Engineer
Project Manager



cc: The Athens Group
Attn: Mr. Jon Richards

COASTAL COMMISSION

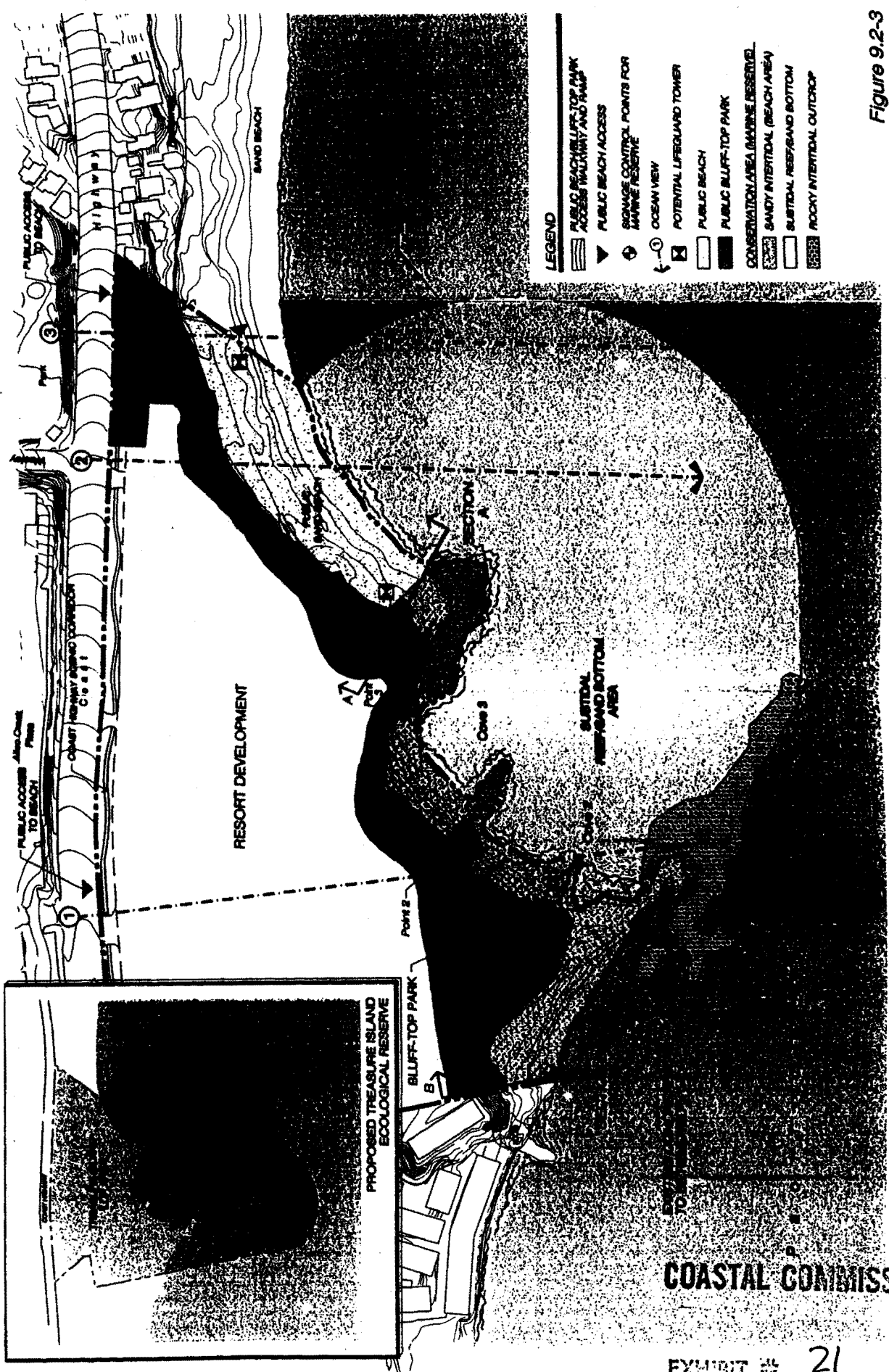


Figure 9.2-3
RESOURCE
MANAGEMENT PLAN

Treasure Island
LOCAL COASTAL PROGRAM

RECEIVED
MAR 16 2000

RESOLUTION NO. 99-78

CALIFORNIA
COASTAL COMMISSION

A RESOLUTION OF THE DESIGN REVIEW BOARD AND
PLANNING COMMISSION OF THE CITY OF LAGUNA BEACH,
CALIFORNIA, CONDITIONALLY APPROVING PROJECT
COASTAL DEVELOPMENT PERMIT 99-78 FOR A SHORELINE
(MARINE) RESOURCE MANAGEMENT PLAN IN RELATION TO
THE TREASURE ISLAND DESTINATION RESORT COMMUNITY
AT 30801 COAST HIGHWAY.

THE DESIGN REVIEW BOARD AND THE PLANNING COMMISSION OF
THE CITY OF LAGUNA BEACH do RESOLVE as follows:

SECTION 1. Five Star Resort LLC, a Delaware Limited Liability Company
(the "Applicant") has filed an application for a Project Coastal Development Permit for a
Shoreline (Marine) Resource Management Plan (the "Project") in relation to the
Treasure Island Destination Resort Community located at 30801 Coast Highway (the
"Property") in accordance with the provisions of the City of Laguna Beach Municipal Code,
the City's General Plan, the Treasure Island Destination Resort Community Local Coastal
Program (the "LCP"), the Treasure Island Specific Plan and the Development Agreement By
and Among the City of Laguna Beach and Five Star Resort LLC (the "DA").

SECTION 2. The Design Review Board and the Planning Commission
conducted legally noticed joint public hearings on September 18, October 2, November 10
and December 1, 1999, and after reviewing and considering all documents, testimony and
other evidence, hereby make the following findings with regard to Project Coastal
Development Permit 99-78 for the proposed Project:

1) The proposed Project is consistent with all applicable provisions of the City's
General Plan, the Treasure Island LCP and Specific Plan, and the DA in that the proposed

COASTAL COMMISSION

EXHIBIT # 22
PAGE 1 Resolution No. 99-78
OF 5

1 Project protects the marine resources in conjunction with the development of a destination
2 resort community, public park and public beach.

3 2) The proposed Project is in conformity with the certified LCP and with the
4 public access and public recreation policies of Chapter 3 of the Coastal Act in that the
5 proposed Project prevents adverse impacts on surrounding soils and provides for the
6 monitoring and protection of marine resources.
7

8 3) The proposed Project will not have any significant adverse impacts on the
9 environment within the meaning of the California Environmental Quality Act in that on June
10 2, 1998, the City adopted Resolution 98.032, which certified a Final Program Environmental
11 Impact Report (the "FEIR") and Mitigation Monitoring Program for the LCP and Treasure
12 Island Specific Plan. The proposed Project is within the scope of the FEIR, is adequately
13 described in the FEIR and does not create new environmental effects or require new
14 mitigation measures. Based on earlier analysis of the FEIR, the Standard Conditions, Project
15 Design Features and Mitigation Measures from the certified FEIR for the Project are
16 adequate to reduce the associated impacts to below a level of significance.
17

18 4) The City of Laguna Beach intends to carry out the provisions of the certified
19 Treasure Island Destination Resort Community LCP and the Treasure Island Specific Plan in
20 a manner fully consistent with the California Coastal Act.
21

22 **SECTION 3.** Based on the foregoing findings, the Design Review Board and the
23 Planning Commission hereby approve Project Coastal Development Permit 99-78 for the
24 proposed Project subject to the following conditions, which are deemed necessary to
25 protect the public health, safety and general welfare and have been included to ensure
26 continued land use compatibility:
27
28

COASTAL COMMISSION

- 1) Comply with all approved plans (i.e., Treasure Island Marine Resources Management Plan), specifications and programs submitted with the application for the proposed Project, including the site plan, as outlined on those plans, specifications or programs. Encompass in the Treasure Island Marine Park a total of about 39.5 acres, including about 3.5 acres of rocky shoreline habitat, 5 acres of sand beach and 31 acres of open ocean and reef habitat within an approximately 1,730-foot long by 1,200-foot wide stretch of coastline next to the proposed Project site. Actively manage the marine resources to minimize visitor impacts, including enforcement of no-take regulations, establishment of a signage program, education of the public and resort guests regarding visitor impacts to marine resources, and monitoring the resources to help prevent environmental degradation. Cooperate with the City in providing for a full marine resource monitoring program that consists of 4 intertidal surveys per year with three 3 sampling sites and 2 underwater surveys per year with 3 stations for a total of five years.
- 2) Cooperate with the City in prohibiting public access to Goff Island and its associated tidepools.
- 3) Work with the City in order to ensure that the marine resources are monitored and policed 24 hours a day, 365 days a year.
- 4) Comply with all Project Design Features, Standard Conditions and Mitigation Measures as identified in the certified FEIR and as outlined in the Mitigation Monitoring Program. Pay for the cost of all engineers, geologists, archaeologists, paleontologists or other similar authorities or specialists that are required by the Mitigation Monitoring Program to provide services during the development of the site.
- 5) Comply with all of the provisions of the DA, including the public park area maintenance responsibilities. Maintain the public park areas in perpetuity and in accordance with

COASTAL COMMISSION
EXHIBIT # 22

Section 3.1.2 of the DA or subject Lot 21 (the Resort Center parcel) to a special assessment by the City pursuant to City Municipal Code Section 7.24.090.

- 6) Prepare a survey of the bluff edge ("Bluff Survey"), subject to the reasonable approval of the City, prior to the completion of the improvements to the public park areas.

Restore the bluff edge to the location shown on the Bluff Survey as required by the City, if, and to the extent, the location of the bluff edge changes from that shown on the Bluff Survey due to major slope failures or minor incremental slope failures.

SECTION 4. The conditional approval of Project Coastal Development Permit 99-78 shall lapse and become void or expire two years following the effective date of such conditional approval. An extension of the conditional approvals may be requested by written application to the Department of Community Development and granted by the Design Review Board, if filed prior to the expiration date. Any extension approval of Project Coastal Development Permit 99-78 shall be subject to applicable Municipal Code Sections, as amended.


ADOPTED this 1st day of December 1999.

AYES:	Boardmember(s):	Noppenberger, Morgenlander, Lenschow, Simon, Pope
	Commissioner(s):	Vail, Chapman, Grossman, Kinsman, Pearson
NOES:	Boardmember(s):	None
	Commissioner(s):	None
ABSENT:	Boardmember(s):	Stuart
	Commissioner(s):	None

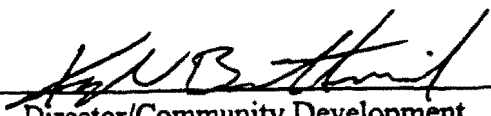
ATTEST:


Chairperson, Design Review Board
City of Coastal Beach, CA

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Chairperson, Planning Commission
City of Laguna Beach, CA



Director/Community Development
City of Laguna Beach, CA

COASTAL COMMISSION

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RESOLUTION NO. 99-79

A RESOLUTION OF THE DESIGN REVIEW BOARD AND PLANNING COMMISSION OF THE CITY OF LAGUNA BEACH, CALIFORNIA, CONDITIONALLY APPROVING PROJECT COASTAL DEVELOPMENT PERMIT 99-79 FOR A STATE MARINE PARK DESIGNATION IN RELATION TO THE TREASURE ISLAND DESTINATION RESORT COMMUNITY AT 30801 COAST HIGHWAY.

THE DESIGN REVIEW BOARD AND THE PLANNING COMMISSION OF THE CITY OF LAGUNA BEACH do RESOLVE as follows:

SECTION 1. Five Star Resort LLC, a Delaware Limited Liability Company (the "Applicant") has filed an application for a Project Coastal Development Permit for designating a State of California Marine Park Designation (the "Project") in relation to the Treasure Island Destination Resort Community located at 30801 Coast Highway (the "Property") in accordance with the provisions of the City of Laguna Beach Municipal Code, the City's General Plan, the Treasure Island Destination Resort Community Local Coastal Program (the "LCP"), the Treasure Island Specific Plan and the Development Agreement By and Among the City of Laguna Beach and Five Star Resort LLC (the "DA").

SECTION 2. The Design Review Board and the Planning Commission conducted legally noticed joint public hearings on September 18, October 2, November 10 and December 1, 1999, and after reviewing and considering all documents, testimony and other evidence, hereby make the following findings with regard to Coastal Development Permit 99-79 for the proposed Project:

- 1) The proposed Project is consistent with all applicable provisions of the City's General Plan, the Treasure Island LCP and Specific Plan, and the DA in that the proposed

1 Project protects marine resources in conjunction with the development of a destination resort
2 community, public park and public beach.

3
4 2) The proposed Project is in conformity with the certified LCP and with the
5 public access and public recreation policies of Chapter 3 of the Coastal Act in that the
6 proposed Project provides for the monitoring and protection of marine resources.

7
8 3) The proposed Project will not have any significant adverse impacts on the
9 environment within the meaning of the California Environmental Quality Act in that on June
10 2, 1998, the City adopted Resolution 98.032, which certified a Final Program Environmental
11 Impact Report (the "FEIR") and Mitigation Monitoring Program for the LCP and Treasure
12 Island Specific Plan. The proposed Project is within the scope of the FEIR, is adequately
13 described in the FEIR and does not create new environmental effects or require new
14 mitigation measures. Based on earlier analysis, the Standard Conditions, Project Design
15 Features and Mitigation Measures from the certified FEIR for the project are adequate to
16 reduce the associated impacts to below a level of significance.

17
18 4) The City of Laguna Beach intends to carry out the provisions of the certified
19 Treasure Island Destination Resort Community LCP and the Treasure Island Specific Plan in
20 a manner fully consistent with the California Coastal Act.

21 SECTION 3. Based on the foregoing findings, the Design Review Board and the
22 Planning Commission hereby approve Project Coastal Development Permit 99-79 for the
23 proposed Project subject to the following conditions, which are deemed necessary to
24 protect the public health, safety and general welfare and have been included to ensure
25 continued land use compatibility:
26

27 COASTAL COMMISSION

28 EXHIBIT # 23
PAGE 2 OF 5

Resolution No. 99-79

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- 1) Comply with all approved plans (i.e., Treasure Island Marine Resources Management Plan), specifications and programs submitted with the application for the proposed Project, including the site plan, as outlined on those plans, specifications or programs. Encompass in the Treasure Island Marine Park a total of about 39.5 acres, including about 3.5 acres of rocky shoreline habitat, 5 acres of sand beach and 31 acres of open ocean and reef habitat within an approximately 1,730-foot long by 1,200-foot wide stretch of coastline next to the proposed Project site. Actively manage the marine resources to minimize visitor impacts, including enforcement of no-take regulations, establishment of a signage program, education of the public and resort guests regarding visitor impacts to marine resources, and monitoring the resources to help prevent environmental degradation. Cooperate with the City in providing for a full marine resource monitoring program that consists of 4 intertidal surveys per year with three sampling sites and 2 underwater surveys per year with 3 stations for a total of five years.
 - 2) Cooperate with the City in prohibiting public access to Goff Island and its associated tidepools.
 - 3) Work with the City in order to ensure that the marine resources are monitored and policed 24 hours a day, 365 days a year.
 - 4) Comply with all Project Design Features, Standard Conditions and Mitigation Measures as identified in the certified FEIR and as outlined in the Mitigation Monitoring Program. Pay for the cost of all engineers, geologists, archaeologists, paleontologists or other similar authorities or specialists that are required by the Mitigation Monitoring Program to provide services during the development of the site.

COASTAL COMMISSION

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- 5) Comply with all of the provisions of the DA, including the public park area maintenance responsibilities. Maintain the public park areas in perpetuity and in accordance with Section 3.1.2 of the DA or subject Lot 21 (the Resort Center parcel) to a special assessment by the City pursuant to City Municipal Code Section 7.24.090.
- 6) Dedicate the public open space and construct the planned public and visitor-serving facilities prior to construction of residential development (Residential Estates and Residential Villas) and prior to or concurrently with the private resort development. Prohibit the issuance of, or effective date of, Building Permits or Coastal Development Permits for single-family homes (Residential Estates) or condominiums (Residential Villas) until: (a) the master grading has been finalized; (b) the backbone infrastructure has been constructed; and (c) the Resort Center's (Hotel and any associated parking structures) foundations have been built.

SECTION 4. The conditional approval of Project Coastal Development Permit 99-79 shall lapse and become void or expire two years following the effective date of such conditional approval. An extension of the conditional approvals may be requested by written application to the Department of Community Development and granted by the Design Review Board, if filed prior to the expiration date. Any extension approval of Project Coastal Development Permit 99-79 shall be subject to applicable Municipal Code Sections, as amended.

ADOPTED this 1st day of December 1999.

AYES: Boardmember(s): Noppenberger, Morgenlander, Lenschow,
Simon, Pope
Commissioner(s): Van, Chapman, Crossman, Kinsman, Pearson

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NOES: Boardmember(s): None

Commissioner(s): None

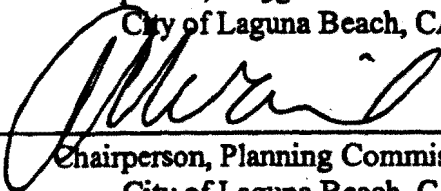
ABSENT: Boardmember(s): Stuart

~~Commissioner(s): None~~

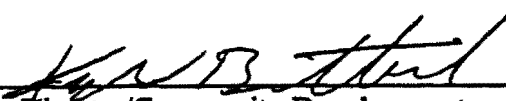
ATTEST:



Chairperson, Design Review Board
City of Laguna Beach, CA



Chairperson, Planning Commission
City of Laguna Beach, CA



Director/Community Development
City of Laguna Beach, CA

COASTAL COMMISSION

EXHIBIT # 23
PAGE 55 OF 5

Resolution No. 99-79

ATTACHMENT A
Treasure Island Resort Community Development Project
Water Quality Measures

1. Landscape Filtration/Runoff

Surface runoff in the park and the hotel courtyard shall be directed across landscape areas before collection into the storm drain system. Grading of the park shall direct runoff away from the ocean front bluff. Surface flow over the bluff shall not be allowed.

2. Irrigation and Landscape Design

The irrigation systems for lawn and shrub areas shall consist primarily of spray heads and rotor heads spaced at 100% head-to-head coverage. Irrigation heads shall be grouped so that heads on the same valve system will have matched precipitation rates to ensure uniform water distribution.

Check valves shall be installed at all irrigation heads and in irrigation pipes as necessary to eliminate low elevation drainage.

Drip irrigation shall be used in the succulent garden area, so that water will be distributed directly to plants, thus eliminating watering unplanted areas.

All irrigation master systems shall have flow sensors and master valves installed on the mainline pipe to ensure system shutdown in the case of pipe or system breakage.

All irrigation master systems shall have an automatic irrigation controller to ensure efficient water distribution. Automatic irrigation controllers shall be easily adjustable so that site watering will be appropriate for daily site weather conditions. Automatic controllers shall have rain shutoff devices so that the irrigation systems will not unnecessarily operate on rainy days.

3. Trash Enclosures

Dumpsters shall be in an enclosed area (walled) with drainage from adjacent areas diverted around (not through) the enclosure.

4. Inlet Trash Racks

The majority of the inlets shall be of the "area drain" type, which are flush with the ground surface and have a grate to screen out larger trash and debris. The more traditional curb opening catch basins shall be primarily on Coast Highway.

5. Water Quality Inlets

All inlets accepting flow from paved areas shall be provided with "Fossil Filter" or "Drainpac" filtration systems, or an approved equivalent system, to remove greases and oils from the "first flush" of runoff. The "first flush" of runoff for this project shall be defined as runoff resulting from 3/4 of an inch of rainfall on the site over a 24-hour period. (These filtration systems have been shown to be effective at removing 95% of the greases and oils in storm runoff.) Filtration systems shall be inspected three times a year, in September, December, and March, and the filter material replaced if necessary. (On average, the filter material needs replacement once a year.)

EXHIBIT No. 24

Appeal Numbers:

A-5-LGB-00-078

A-5-LGB-00-079

**Water Quality
Measures**

California Coastal

TTM 15497 & CDP 99-75

1 **6. Dry Weather Flow Diversion**

2 Nuisance flow that occurs during dry weather (when rainfall is less than ¼" on the site
3 during a 24-hour period) shall be diverted to the sanitary sewer system. This includes all
4 flow tributary to the three proposed outlets, including flow from approximately 63 acres
5 upstream of the site. Three valves located on-site shall control this diversion. Flow
6 capacity meters to be installed by the developer in the sewer system downstream of the
7 diversion shall provide year round monitoring of the nuisance flow diversion. This will
8 allow the City to process the "first flush" and will extend the nuisance diversion up to the
9 capacity of the sewer system on a year-round basis. This approach to nuisance flow
10 diversion is designed in hopes of pioneering this environmentally sensitive method of
11 keeping coastal waters clean and safe.

12 **7. Energy Dissipaters**

13 Three storm drain outlets shall be reconstructed at the base of the bluffs, at the back of
14 the sandy beach. Outlets shall utilize riprap energy dissipaters that will be buried with
15 sand. The outlets themselves shall include a concrete headwall to protect the surrounding
16 bluff from erosion and safety grates to prevent children from entering the drainage pipes.
17 After major storm events, lost sand shall be replaced pursuant to a beach maintenance
18 agreement between the developer and the City. This beach maintenance may at times
19 partially cover the storm drain outlets.

20 **8. Installation and Maintenance**

21 All of the above items shall be installed by the developer, and all on-site privately owned
22 water quality measures shall be maintained by the resort operator or the Homeowners
23 Association.

24 **9. Fertilizer and Organic Soils Management**

25 The use of fertilizers and pesticides in the resort and all common areas shall be subject to
26 the County of Orange's Management Guidelines for the use of Fertilizers and Pesticides.
27 The Homeowners Association shall institute an education program for the single-family
28 property owners. An Organic Soils Management program shall include the use of
organic fertilizers that are environmentally safe and are checked for ash, sand and
alkalinity content. The use of red worms (vermicomposting) together with cultivation
will add to the establishment of healthy soils and help implement the Organic Soils
Management program.

10 **10. Project Street Sweeping and Litter Pickup**

11 The resort operator or Homeowners Association shall be responsible for sweeping all
12 streets, sidewalks and parking lots within the development at least once a week and for
13 picking up litter daily in the park, beach and scenic highway corridor areas.

14 **11. City Street Sweeping**

15 No later than one year after the opening of the hotel, the City shall increase the frequency
16 of its Citywide street sweeping from twice a month to weekly.

17 **12. Coast Highway Storm Drain Inlet Upgrades**

18 During the construction of the on-site storm drain system, the City will install and then
19 maintain sediment and hydrocarbon separator(s), similar to "Stormceptor" clarifiers, for
20 the two existing and three proposed storm drain inlets next to the Treasure Island
21 along Coast Highway.

Project Water Quality Improvements

The following is a list of the Treasure Island proposed infrastructure water quality improvements:

1. All drain inlets within the Treasure Island project accepting flow from impervious surfaces will incorporate a "Fossil Filter" or an equivalent filtration system that will have the capacity to filter the "First Flush" runoff generated from storm events up to and including 0.75 inch rainfall in a 24 hour period.
2. The upgraded storm drain line at the south end of the site that serves about 60 acres above the Treasure Island project will include a "Stormceptor" clarifier or an equivalent filtration system that will have the capacity to filter the "First Flush" runoff generated from storm events up to and including 0.75 inch rainfall in a 24 hour period.
3. Dry weather nuisance flow (estimated to be approximately 5,000-6,000 gallons per day) coming from the project site and the storm drain system from the 60-acre neighborhood above the site will be diverted to the sanitary sewer system. Flow capacity meters installed downstream of the diversion will allow monitoring of nuisance flow. The diversion flow into the sanitary sewer system will be shut off once a maximum of 10,000 gallons per day (GPD) threshold is reached. The dry weather nuisance flow diversion will be in operation year-round except on occasions when the 10,000 GDP thresholds are exceeded.

Nuisance Flow Runoff Volume

The following is an outline of the nuisance runoff volume for the Treasure Island site and the 60-acre neighborhood above. Based on actual pumping rate averages throughout the City of Laguna Beach a value of 70 gallons a day from each acre of medium density residential is used for the estimated volume calculations (Steve May, City of Laguna Beach Director of Engineering and Sewer Services). The attached maps show the subject on and off-site hydrology zones.

On-Site Runoff Volume – 22.1 Acres x 70 gallons/acre/day
= 1550 Gallons Per Day

Off-Site Runoff Volume – 60.6 Acres x 70 gallons/acre/day
= 4250 Gallons Per Day

<Total Runoff Volume = 5800 Gallons Per Day>

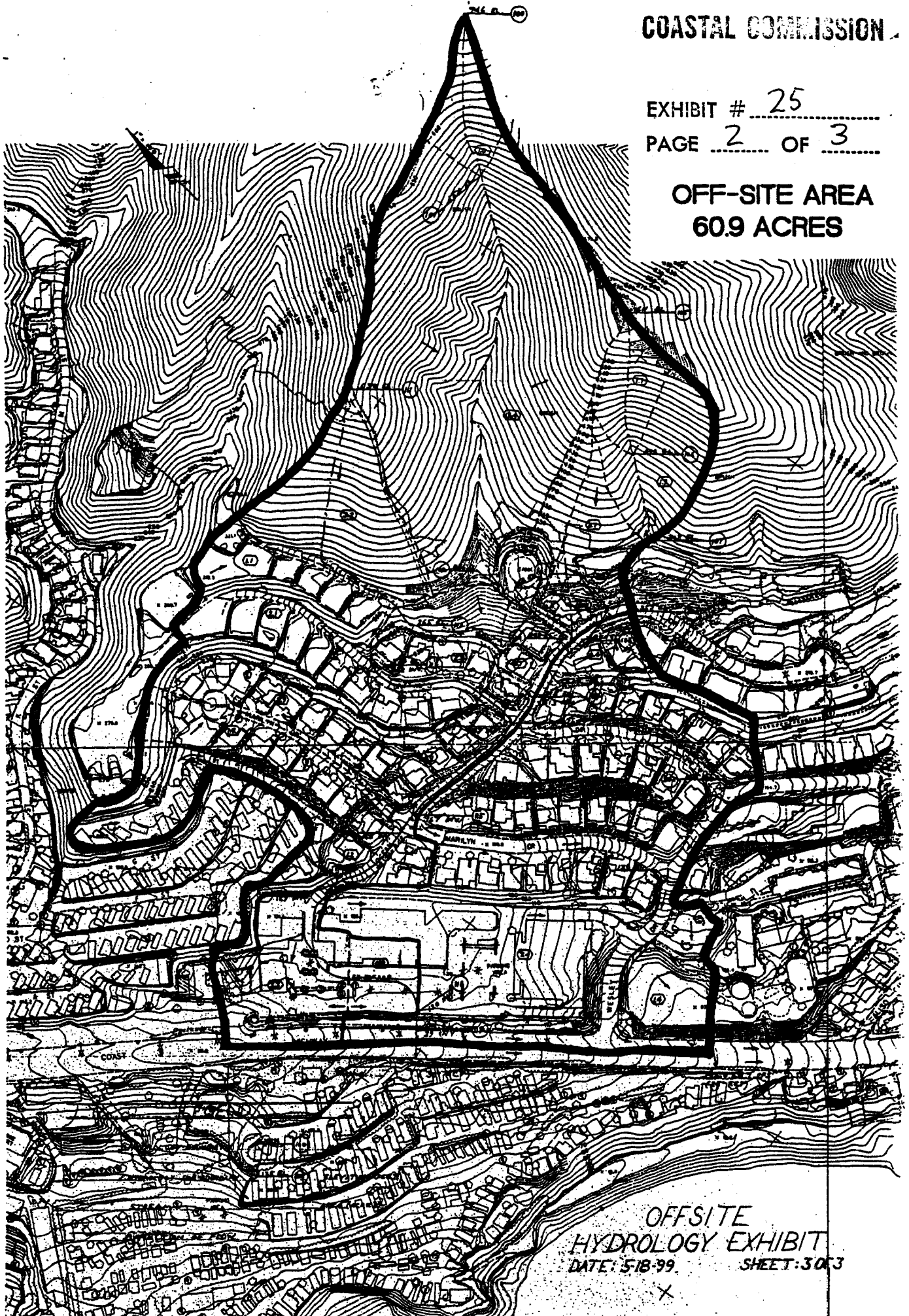
COASTAL COMMISSION

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COASTAL COMMISSION

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OFF-SITE AREA
60.9 ACRES



SOUTH COAST



WATER DISTRICT

Providing Quality Water and Wastewater Services to the Coastal Communities

May 25, 2000

Ms. Anne Kramer
California Coastal Commission
South Coast Area Office
200 Oceangate, Ste. 1000
Long Beach, CA 90802-4302

RECEIVED
MAY 26 2000

CALIFORNIA
COASTAL COMMISSION

RE: TREASURE ISLAND DEVELOPMENT
SEWER SYSTEM UPGRADE

Dear Ms. Kramer:

The following table outlines the upgrades to the various District facilities:

1. Upgrade sewer lift station from existing peak flow of approximately 110 gpm to 360 gpm.
2. Upgrade 650 feet of 6-inch force main to 8-inch force main.
3. Upgrade drop sewer manhole (vertical shaft) and 300 feet of 10-inch sewer pipeline tunnel.

These are the District facilities that will be upgraded and/or replaced in order to accommodate the hotel sewer flows. All other District facilities have the capacity to convey/treat the estimated wastewater flow and estimated 10,000 gallons per day dry weather nuisance water runoff.

If you have any questions or require further information, please feel free to call.

Very truly yours,

SOUTH COAST WATER DISTRICT

Michael P. Dunbar

Michael P. Dunbar
General Manager

MPD:rb

COASTAL COMMISSION

EXHIBIT # 26
PAGE 1 OF 1

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