

**CALIFORNIA COASTAL COMMISSION**

SAN DIEGO AREA

7575 METROPOLITAN DRIVE, SUITE 103

SAN DIEGO, CA 92108-4402

767-2370



RECORD PACKET COPY

**Fri 10a**

Filed: 12/20/01  
49th Day: 2/7/02  
180th Day: 6/18/02  
Staff: DS-SD  
Staff Report: 1/16/02  
Hearing Date: 2/5-8/02

REGULAR CALENDAR  
STAFF REPORT AND PRELIMINARY RECOMMENDATION

Application No.: 6-00-166

Applicant: Tijuana River National Estuarine Research Reserve (TRNERR)

Agent: Gary Abbott

Description: Construction of an approximately 4,000 sq. ft. interpretive plaza and amphitheater consisting of three curvilinear concrete seating platforms set among decorative paving and landscaping within a perimeter retaining wall at the site of an existing 6,137 sq. ft. visitors center.

Site: 301 Caspian Way, Imperial Beach, San Diego County  
APN: 632-400-32-00

Substantive File Documents: Letter to Ellen Lirley from Greg Abbott 12/20/01; State of California Environmental Review Memorandum 6/26/00;; Water Pollution Control Program (WPCP) for T.R.N.E.R.R by California State Parks 5/1/01; Tijuana River Comprehensive Management Plan; Consistency Determination 28-87; CDP #6-99-106.

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STAFF NOTES:Summary of Staff's Preliminary Recommendation:

Staff recommends approval of the project proposal with conditions. The proposed development is located in close proximity to the Tijuana River Estuary and its associated wetland and upland habitats. The proposed development will serve to enhance the existing visitors center and has been designed to minimize all adverse impacts on coastal resources.

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**I. PRELIMINARY STAFF RECOMMENDATION:**

The staff recommends the Commission adopt the following resolution:

**MOTION:** *I move that the Commission approve Coastal Development Permit No. 6-00-166 pursuant to the staff recommendation.*

**STAFF RECOMMENDATION OF APPROVAL:**

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

**RESOLUTION TO APPROVE THE PERMIT:**

The Commission hereby approves a coastal development permit for the proposed development and adopts the findings set forth below on grounds that the development as conditioned will be in conformity with the policies of Chapter 3 of the Coastal Act and will not prejudice the ability of the local government having jurisdiction over the area to prepare a Local Coastal Program conforming to the provisions of Chapter 3. Approval of the permit complies with the California Environmental Quality Act because either 1) feasible mitigation measures and/or alternatives have been incorporated to substantially lessen any significant adverse effects of the development on the environment, or 2) there are no further feasible mitigation measures or alternatives that would substantially lessen any significant adverse impacts of the development on the environment.

**II. Standard Conditions.**

See attached page.

**III. Special Conditions.**

1. Landscaping Plan. PRIOR TO THE ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicant shall submit for the review and written approval of the Executive Director, a final landscaping plan, and shall including the following:

a. Drought tolerant native or non-invasive plant materials shall be utilized, including the replacement of the following native species: San Diego sunflower (*Viguiera laciniata*); coastal sagebrush (*Artemisia californica*); California buckwheat (*Eriogonum fasciculatum*); coastal agave (*Agave shawii*); and cholla (*Opuntia* sp.).

b. A planting schedule that indicates that the planting plan shall be implemented within 60 days of construction completion.

c. All required plantings shall be maintained in good growing conditions, and whenever necessary, shall be replaced with new plant materials to ensure continued compliance with applicable landscape requirements.

d. Five years from the date of issuance of the coastal development permit, the applicant shall submit for review and written approval of the Executive Director, a landscape monitoring report; prepared by a licensed Landscape Architect or qualified Resource Specialist, that certifies the on-site landscaping is in conformance with the landscape plan approved pursuant to this Special Condition. The monitoring report shall include photographic documentation of plant species and plant coverage.

If the landscape monitoring report indicates the landscaping is not in conformance with or has failed to meet the performance standards specified in the landscaping plan approved pursuant to this permit, the applicant, or successors in interest, shall submit a revised or supplemental landscape plan for the review and written approval of the Executive Director. The revised landscaping plan must be prepared by a licensed Landscape Architect or qualified Resource Specialist and shall specify measures to remediate those portions of the original plan that have failed or are not in conformance with the original approved plan.

The permittee shall undertake the development in accordance with the approved landscape plans. Any proposed changes to the approved landscape plans shall be reported to the Executive Director. No changes to the landscape plans shall occur without a Coastal Commission approved amendment to this coastal development permit unless the Executive Director determines that no amendment is required.

2. Final Plans. PRIOR TO THE ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicants shall submit to the Executive Director for review and written approval, final site plans for the permitted development that have been approved by the US Fish and Wildlife Service and the California Department of Fish and Game. Said plans shall be in substantial conformance with the plans submitted with this application by California State Parks, dated 12/20/01, and shall document the provision of a minimum 150 ft. wetland buffer to the west, and 200 ft. buffer to the south of the permitted development.

The permittee shall undertake development in accordance with the approved final plans. Any proposed changes to the approved final plans shall be reported to the Executive Director. No changes to the approved final plans shall occur without an amendment to this coastal development permit unless the Executive Director determines that no amendment is required.

3. Final Drainage Plans. PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicant shall submit to the Executive Director for review and written approval, final drainage and runoff control plans, which shall be in

substantial conformance with the Water Pollution Control Plan for Tijuana River National Estuarine Research Reserve dated May 1, 2001. The plans shall document that the runoff from all impervious surfaces will be collected and directed into pervious areas on the site (landscaped areas) for infiltration and/or percolation to the maximum extent practicable, prior to being conveyed off-site in a non-erosive manner.

The permittee shall undertake development in accordance with the approved drainage and runoff control plans. Any proposed changes to the approved drainage and runoff control plans shall be reported to the Executive Director. No changes to the approved plans shall occur without an amendment to this coastal development permit unless the Executive Director determines that no amendment is required

#### IV. Findings and Declarations.

The Commission finds and declares as follows:

1. Detailed Project Description/History. Proposed is the construction of an outdoor approximately 4,000 sq. ft. amphitheater and interpretive plaza consisting of three curvilinear concrete seating platforms set among decorative paving and landscaping within a perimeter retaining wall. The project site is located on the southwest side of an existing 6,137sq. ft. visitors center and will serve as an educational facility for school groups as well as for public interpretive nature presentations.

In July 1987, the Coastal Commission approved the existing visitors center, maintenance buildings, and parking lot pursuant to Consistency Determination 28-87. In September, 1999 the Commission approved without conditions CDP #6-99-106 for the construction of 1,100 sq. ft. of office space and garage area.

The subject site is located within the City of Imperial Beach, on the northern boundary of the Tijuana River National Estuarine Research Reserve. The overall site includes a visitors center, maintenance buildings (which are accessory to the visitors center) and a public parking lot for the visitors center guests and employees. A system of public trails leads away from the visitors center in several directions and encompasses a portion of the project site as well. The estuary itself is located west and south of the site and includes both uplands and wetlands. North of the site, across Caspian Way, is an existing residential development, and there is a large condominium complex located to the east.

The Tijuana River National Estuarine Research Reserve is located approximately 3 miles west of Interstate 5, approximately 1 mile south of Imperial Beach Blvd on the south side of Caspian Way in the City of Imperial Beach in San Diego County.

The project site is within the boundaries of the City of Imperial Beach. However, the proposal site lies in the Coastal Commission's area of original permit jurisdiction, and Chapter 3 policies of the Coastal Act are the standard of review.

2. Visual Resources. The following policy of the Coastal Act addresses visual resources, and states, in part:

**Section 30251**

The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and minimize the alteration of natural landforms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas...

The subject proposal is to construct a circular amphitheater area overlooked by three curvilinear rows of bench seating and will not exceed 4 feet in height. The proposed project will not block any existing public views across the site towards the estuary from inside the visitors center or from the road, as the project will only rise 4 ft. from the ground and be located west of, and blocked by, the existing visitor center. In addition, the project will be landscaped with native, non-invasive, plant materials that will aide in creating a natural looking landscape. The project will be constructed using earth-toned building materials to help minimize visual impacts to the area. As well, the proposed rows of seating are contoured such that the resulting development will blend into the surrounding area to a greater degree than would straight, perpendicular structures.

Special Condition #1 requires that a final landscaping plan be submitted to the Executive Director that includes the replacement of several native plant species that will be removed during construction. These native plant materials will be placed along the perimeter of the development, as well as within several areas of landscaping included between the proposed benches, to further blend the project with the surrounding natural environment. The low profile of the structures, as well as the proposed building materials, the shielded location site, and native landscaping in and around the development, ensures that the project will minimize visual impacts to the area. The Commission, therefore, finds the proposed development consistent with Section 30251 of the Act.

3. Public Access. Many policies of the Coastal Act address the provision, protection and enhancement of public access opportunities, particularly access to and along the shoreline. For the subject site, the following policies are most applicable, and state, in part:

**Section 30210**

In carrying out the requirement of Section 4 of Article X of the California Constitution, 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**

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

**Section 30223**

Upland areas necessary to support coastal recreational uses shall be reserved for such uses, where feasible.

**Section 30604**

... (c) Every coastal development permit issued for any development between the nearest public road and the sea or the shoreline of any body of water located within the coastal zone shall include a specific finding that the development is in conformity with the public access and public recreation policies of Chapter 3 (commencing with Section 30200). ...

The project site is located between the sea and first coastal road. There is no beach or other active recreational amenities at the site. However, the estuary resources provide opportunities for passive recreation, such as hiking and bird watching, and the visitors center includes a variety of displays, exhibits and programs for public enjoyment and education. The existing amenities and activities for school groups and the public will be enhanced by the proposed amphitheater as a location for nature walk overviews, lectures, seminars, as well as an organizational focus point to stage hikes and bird watching tours. The purpose of the proposed plaza and amphitheater, moreover, is to support the activities of the visitors center, which receives visitors from around the world and is considered a significant public resource.

The facility currently has 48 parking spaces and several areas designated for bus parking. The project proposal does not include any additional parking because the subject proposal is not intended to increase visitation, but enhance the experience of existing school field-trip curriculum and public educational programs. The existing parking lot is rarely filled to capacity, and any increase in parking that may result from the proposed development can be handled with current parking resources. The project site is not located within appreciable walking distance to the beach, and no foreseeable impact to public parking is anticipated. The Commission thus finds that the proposed project will not have a significant impact on public access to the area and that the development is consistent with the cited access policies of the Coastal Act.

4. Runoff/Water Quality/Environmentally Sensitive Habitat Areas. Section 30231 of the Coastal Act addresses water quality, and states, in part:

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 entertainment, 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.

In addition, Section 30240 of the Coastal Act is applicable, and states:

(a) Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only dependant on those resources shall be allowed within those areas.

(b) Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade those areas, and shall be compatible with the continuance of those habitat and recreation areas.

The Tijuana River Estuary is a small intertidal coastal estuary on the international border between California and Mexico. The estuary is primarily a shallow water habitat, though it is often termed an "intermittent estuary," as it is subjected to extreme changes in streamflow at different times of the year. Extended periods of drought leave parts of the estuary dry during some periods of the year, while flooding inundates the same areas during others. For this reason, Tijuana Estuary is considered to be a very unique part of the National Estuarine Research Reserve System.

The Tijuana River Estuary is one of the few salt marshes remaining in Southern California, where over 90% of wetland habitat has been lost to development. The site is an essential breeding, feeding and nesting ground and key stopover point on the Pacific Flyway for over 370 species of migratory and native birds, including six endangered species. The Reserve spans 2,500 acres and offers four miles of walking trails, taking visitors into prime bird watching areas and down to the river mouth where the Tijuana River meets the Pacific Ocean.

The proposed project includes construction of a circular amphitheater and three rows of bench seating surrounded by a three-foot retaining wall adjacent to wetland areas in conjunction with the existing visitor's center. To ensure the protection of estuary habitat as well as resident bird, mammal, and plant populations, the project includes a 150 ft. wetland buffer along the west side of the project boundary and a 200 ft. buffer along the southern perimeter. Special Condition #2 requires that final construction plans be submitted to the Executive Director for review and approval that include a 150 ft. and

200 ft buffer to the west and south of the project site, respectively. The 150 ft. setback was found to be sufficient by US Fish and Wildlife and California Department of Fish and Game staff biologists to assure protection of adjacent wetlands, and will minimize unnecessary impacts to wetland habitat resulting from the project proposal (See Exhibit C).

While the majority of the subject development will include pervious surfaces, approximately 1,000 sq. ft. of hardscape and impervious surface is proposed. In order to maintain water quality and ensure no polluted runoff enters the wetland from the project site, Special Condition #3 requires that a final drainage/runoff control plan be submitted to the Executive Director that will document that runoff from the subject development will be routed through sufficient vegetative buffers to ensure proper filtration and eventual drainage into the estuary.

The area where the project is proposed to be constructed is mostly disturbed but does contain some native plantings. The project proposal includes the removal of several individual plant species that exist as part of a native garden area surrounding the visitor center and parking lot. These species were placed on-site as part of the original construction of the visitors center, and replaced non-native species and disturbed habitat that existed previously. Although the proposed construction will remove some of these specimens, Special Condition #1 requires the applicant to replace these species around and within the site as part of the post-construction landscape plan. The plants to be removed do not represent environmentally sensitive habitat, but simply a representation of various native plant species found in the Tijuana River National Estuarine Research Reserve, and serve to enhance visitor's experience. The proposed project will not significantly degrade the Reserve, and the project as conditioned will maintain existing plant and animal biodiversity as well as upland habitat. The proposed development will also maintain a minimum 150 ft. buffer from wetlands. The proposed development and buffer have been reviewed and found acceptable by DFG and USFWS. As conditioned, therefore, the Commission finds that the project proposal will not adversely affect water quality or environmentally sensitive habitat of the surrounding wetland, and is consistent with Sections 30231 and 30240 of the Coastal Act.

5. Local Coastal Planning. Section 30604(a) also requires that a coastal development permit shall be issued only if the Commission finds that the permitted development will not prejudice the ability of the local government to prepare a Local Coastal Program (LCP) in conformity with the provisions of Chapter 3 of the Coastal Act. In this case, such a finding can be made.

The project site is designated and zoned as Open Space in the City of Imperial Beach's certified LCP. The proposed project lies within the Coastal Commission's area of original permit jurisdiction and as demonstrated in the previous findings, the proposal is fully consistent with all applicable Chapter 3 policies of the Coastal Act. The project development is also consistent with the Tijuana River Comprehensive Management Plan. Therefore, the Commission finds that approval of the proposed development will not



prejudice the ability of the City of Imperial Beach to continue implementation of its certified LCP.

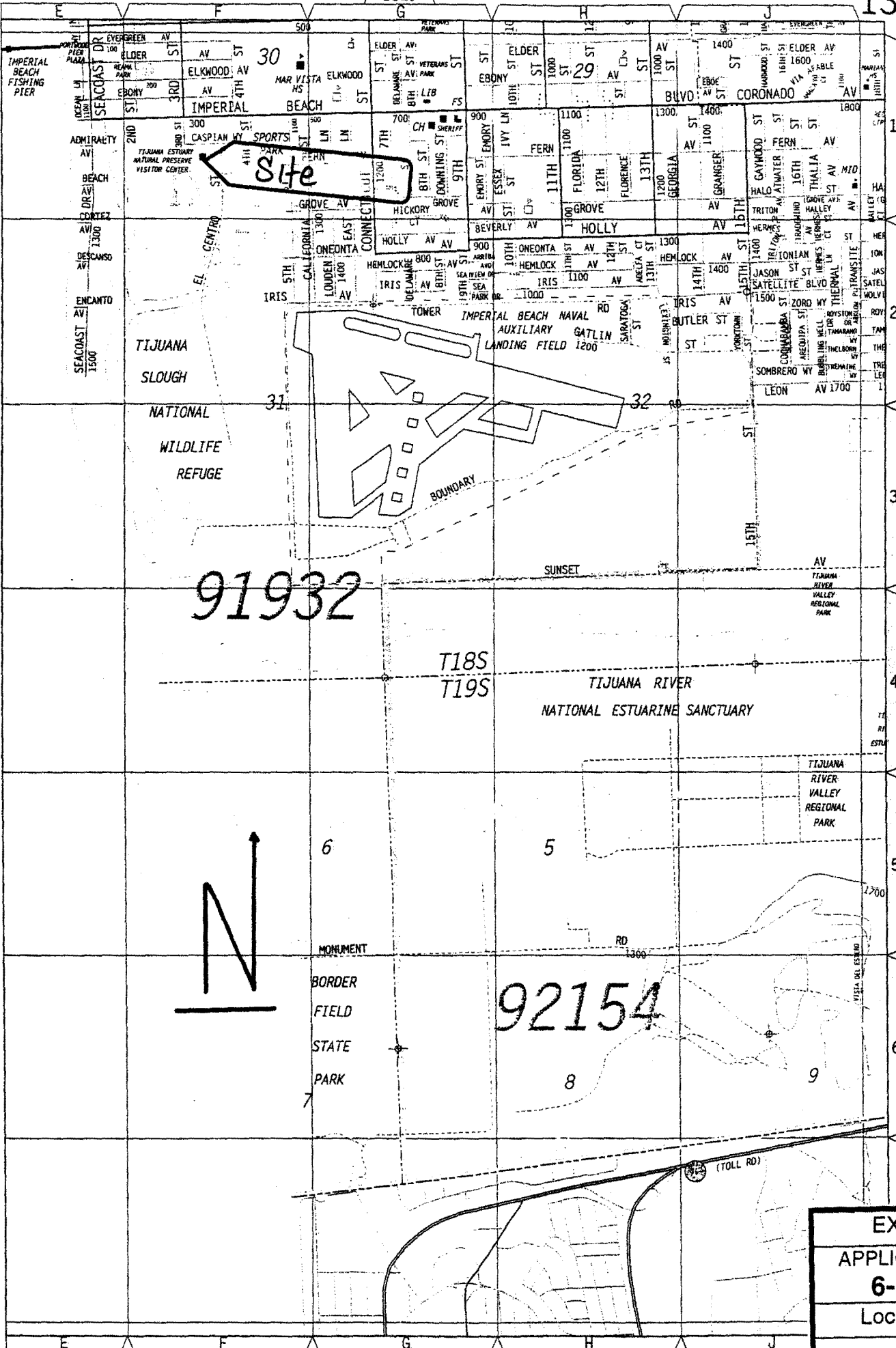
5. Consistency with the California Environmental Quality Act (CEQA). Section 13096 of the Commission's Code of Regulations requires Commission approval of coastal development permits to be supported by a finding showing the permit to be consistent with any applicable requirements of the California Environmental 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 that the activity may have on the environment.

As discussed herein, the proposed project will not cause significant adverse impacts to the environment. Specifically, the project has been found consistent with the visual resource and public access policies of the Coastal Act. There are no feasible alternatives or mitigation measures available that would substantially lessen any significant adverse impact which the activity might have on the environment. Therefore, the Commission finds that the proposed project is the least environmentally damaging feasible alternative and is consistent with the requirements of the Coastal Act to conform to CEQA.

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 on which the Commission voted on the application. 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. Interpretation. Any questions of intent or interpretation of any condition will be resolved by the Executive Director or the Commission.
4. Assignment. The permit may be assigned to any qualified person, provided assignee files with the Commission an affidavit accepting all terms and conditions of the permit.
5. 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.

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Site

91932

92154

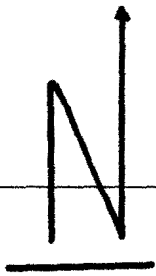
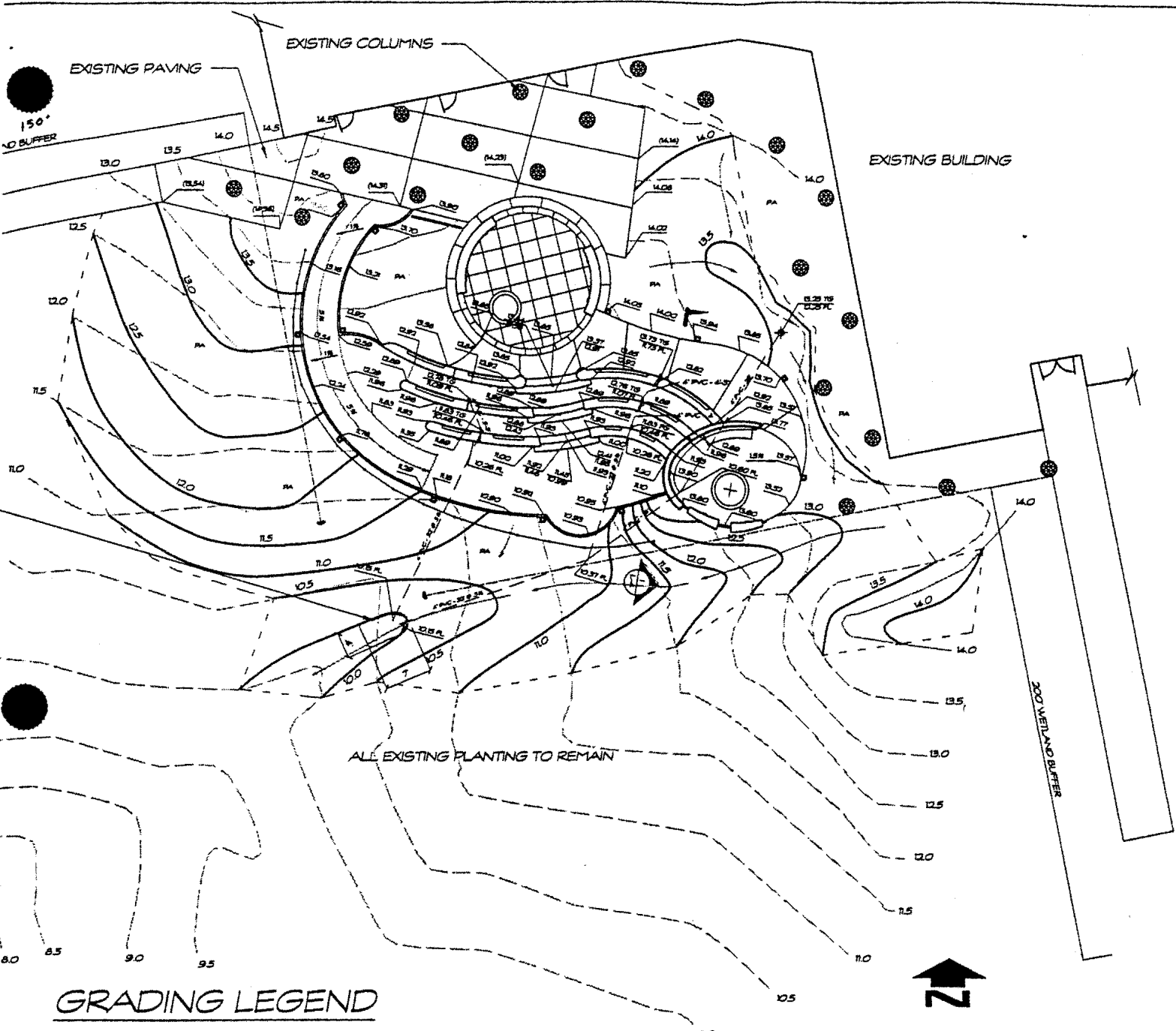


EXHIBIT A  
 APPLICATION NO.  
 6-00-166  
 Location Map

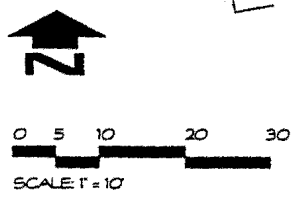
SAN DIEGO CO.



**GRADING LEGEND**

- TG TOP OF GRATE
- FL FLOW LINE
- (000) EXISTING PAVING FINISH SURFACE
- PA PLANTING AREA
- ← SWALE
- AREA DRAIN (REFER TO DETAIL 6 SHEET L-5)
- ⊕ 4" DIAMETER ATRIUM DRAIN BY NDS, MODEL NDS 101, GREEN IN COLOR WITH A SPEE-D-BASIN
- - - 4" or 6" DIAMETER DRAINLINE (SIZE DENOTED ON DRAWING)

- 4" DIAMETER PERFORATED DRAINLINE (FOR THE ELLIPSE WALL)
- EXISTING CONTOURS
- PROPOSED CONTOURS
- EDGE OF GRADING



**EXHIBIT B**  
**APPLICATION NO.**  
**6-00-166**  
**Site Plan**

RECEIVED

DEC 20 2001

CALIFORNIA  
COASTAL COMMISSION  
SAN DIEGO COAST DISTRICT



State of California • The Resources Agency

Gray Davis, Governor

DEPARTMENT OF PARKS AND RECREATION  
Southern Service Center  
8885 Rio San Diego Drive, Suite 270,  
San Diego, CA 92108  
(619) 220-5300 / FAX (619) 220-5400

Rusty Areias, Director

December 20, 2001

Ms. Ellen Lirley, Coastal Planner  
California Coastal Commission  
7575 Metropolitan Drive, Suite 103  
San Diego, CA 92108-4402

Subject: Coastal Development Permit Application #6-00-166 (Construction of an Interpretive Plaza at Tijuana Estuary Visitor Center, Imperial Beach California).

Dear Ms. Lirley:

The above referenced project was submitted for your review back in November 2000. Following that submittal, you had provided your comments via a letter dated November 30, 2000 requesting for additional information. Per your comments and concerns raised by Martin Kenney, U.S. Fish and Wildlife Service (Service) and Libby Lucas, California Department of Fish and Game (CDFG), the amphitheater design was modified.

With the current design modification as reflected in the attached plans and with the support material enclosed, the Department of Parks and Recreation, is pleased to respond to your questions regarding the project. Please find the following items:

- One full-size set of project plans delineating all the proposed work. Please find the attached set of plans for the project. The plans reflect the revised design concept. In short, the amphitheatre was reduced in size and shifted eastward toward the existing visitor center. The project is outside of the desired 150' buffer requested by the Service and CDFG. ADA access and the drainage concepts from the originally submitted design remain intact.
- Drainage and erosion control plans, including identification of the water quality standard to which the proposed improvements are designed. The attached plans and Water Pollution Control Program (WPCP) document denotes the drainage and erosion control concept. We have also included a sheet of calculations prepared for this project by a licensed civil engineer.

The drainage and erosion control concept have been designed to comply with the requirements of the Regional Water Quality Control Board permit for San Diego County, and incorporates the current design storm requirements of the Board as outlined in Order No. 2001-01, "Waste Discharge Requirements for Discharges of Urban Runoff From the Municipal Separate Storm Sewer Systems (MS4s) Draining the Watersheds of the County of San Diego, the Incorporated Cities of San Diego County, and the San Diego Unified Port District." Specifically, our drainage and erosion control plan incorporates best management practices (BMPs) that have been designed to mitigate the volume of runoff produced for a 24-hour, 85<sup>th</sup> percentile storm event (0.6 inch approximate average for the San Diego County area).

- A construction schedule acceptable to the U.S. Fish & Wildlife Service and the California Department of Fish & Game. Construction will occur between September 15<sup>th</sup> and February 1st as directed by the Service and CDFG.

EXHIBIT C
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- Confirmation from the Service and CDFG that the approximately 200 ' wetland buffer is adequate in this location. During a site visit with Martin Kenney (Service) and Libby Lucas (CDFG), both the Service and CDFG desired a minimum of 150 feet buffer between the tidal connector to the west and 200 feet buffer between the salt marsh to the south. The 150 feet buffer is acceptable to the Service and CDFG because the wetland west of the visitor center was created by the 'Tidal Linkage' wetland restoration project.

The original design was encroaching slightly into the 150 feet buffer. To address this issue, the amphitheatre was pushed eastward to fall outside the desired 150 feet buffer, as measured by Martin Kenney (Service) at the site, from the edge of *Salicornia* dominated upper marsh to the western most concrete pillar (refer to attached plan).

- Plans identifying the locations of all staging and storage areas required to construct the project; use of public parking spaces for this purpose should be avoided. All storage and staging will take place at the existing maintenance building. Access to the actual construction site will be from the southeast. No parking spaces will be used for staging or storage. The contractor and workers will be educated on the sensitivity of the construction location and the importance of minimizing their impacts on plants and animals.
- Documentation that existing parking facilities remain adequate to serve the proposed expansion. The intended use of the proposed amphitheater area is to serve school groups and other large group visitors, the majority of which arrive by bus. Large groups are defined as 20 or more persons per group.

During Calendar year 2000, the Visitor Center had a visitation of 16,500 total annual visitors. Of this total, 5,271 persons attended on one of 353 organized programs. Out of these visitors, a total of 2,693 visitors attended as part of large groups. This represents a total of 51% of visitors attending programs arriving as part of a large group.

Of the remaining non-program visitors, only 5,795 visited the center on the weekend. This represents a total average weekend visitation of 482 visitors per month, or 111 average visitors per weekend based on a 52-week year. Because these visitors typically arrive with more than one person per vehicle and because they arrive throughout the day, the parking lot has always been more than adequate to accommodate visitors.

However, we understand that the Commission is concerned over the potential for displacement of beach visitor parking by visitors to the center that may spillover onto surrounding streets at times of high beach visitor use. Surprisingly, the highest visitation months are (in order) January, April and December and February (tied). The lowest visitation months are (in order) October, September and August, with visitation in May and June barely higher than August. Because of these results, we feel that not only is there adequate parking, but also that there is little potential conflict between visitor center parking and beach visitor parking. The monthly visitor totals are depicted in the attached table.

- Other modifications being incorporated to address the concerns of the Service and CDFG:

Protective fencing during construction is being proposed and is referred to in the WPCP and in the construction documents and specifications.

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A cable fence is being proposed on the perimeter of the project to discourage people from encroaching onto the native habitat.

DPR will work with the Service and CDFG to supervise or conduct the proposed salvaging and transplanting of the native plant material displaced by the project. This work will invoice documenting the number and species removed and mapping the locations they were transplanted. Seeds will be gathered from the plants during the summer before they are transplanted. Follow-up will involve mentoring, invasive control and replanting if necessary with grown plants from seeds previously gathered and stored. A follow-up study to determine the success of the relocation efforts and contingency measures if the relocation has failed will be conducted by Park staff.

All lighting is low to the ground plane and directed towards the building or shield so no direct lighting is facing the wetlands.


We hope that the above items and enclosed documents answers the questions raised in your November 30, 200 letter. If you require additional information or clarification, please contact me at (619) 575-3613.

Sincerely,



Greg Abbott  
Department of Park and Recreation

Libby Lucas (CDFG)  
Martin Kenney (Service)  
Paul Webb (DPR)  
Tessa Roper (DPR)  
Ronie Clark (DPR)

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 California Coastal Commission