

CALIFORNIA COASTAL COMMISSION

SAN DIEGO AREA

7575 METROPOLITAN DRIVE, SUITE 103

SAN DIEGO, CA 92108-4402

767-2370

**Mon 8b**

Filed: 7/10/02
49th Day: 8/28/02
180th Day: 1/5/03
Staff: LRO-SD
Staff Report: 8/22/02
Hearing Date: 9/9-13/02

STAFF REPORT AND RECOMMENDATION ON APPEAL
SUBSTANTIAL ISSUE

LOCAL GOVERNMENT: City of San Diego

RECORD PACKET COPY

DECISION: Approved with Conditions

APPEAL NO.: A-6-LJS-02-105

APPLICANT: Daniel and Sandra Kindred

PROJECT DESCRIPTION: Remodel and addition to existing single-family residence on blufftop lot to include demolition of 169 sq.ft. and addition of 810 sq.ft. in two stories.

PROJECT LOCATION: 5680 Dolphin Place, La Jolla, San Diego, San Diego County.
APN 357-421-03

APPELLANTS: La Jolla Town Council

Staff Notes:

The appeal was filed on July 10, 2002. However, the City file was not received until August 9, 2002. Therefore, the project was opened and continued at the August 7, 2002 Commission meeting. Because the City file was not received in the San Diego District Office until 8/9/02, there has not been sufficient time to review the project, consult with the Commission's geologist and to develop a recommendation on the de novo permit for the September meeting.

SUMMARY OF STAFF RECOMMENDATION:

The staff recommends that the Commission, after public hearing, determine that substantial issue exists with respect to the grounds on which the appeal has been filed.

SUBSTANTIVE FILE DOCUMENTS: Certified La Jolla-La Jolla Shores LCP Addendum; Certified City of San Diego Local Coastal Program; Notice of Final Action for CDP 6482/SDP 6483 dated 6/20/02; City of San Diego Resolution No.D-3078; Appeal Form dated 7/10/02; City of San Diego Report to the Hearing Office dated 6/5/02; Reports of Geotechnical Investigation by Southern California Soil and Testing, Inc. dated 3/6/01 and 8/24/01 and updated 12/4/01.

I. Appellants Contend That: The appellants contend that the development, as approved by the City, may be inconsistent with the certified LCP. Specifically, the appellants contend that the development is inconsistent with the shoreline hazard policies of the certified LCP. The appellant contends the City should not have allowed a reduction in the required 40-ft. setback from the bluff edge for a second-story addition to an existing one-story single story residence because it would be constructed on a separate foundation. There is presently shoreline protection on the coastal bluff seaward of the residence consisting of both a rip rap revetment at the toe of the coastal bluff as well as gunite on the bluff face. Pursuant to the City's certified LCP if there is any shoreline protection devices on the site then a reduction to the 40 ft. geologic setback cannot be permitted. In fact, in apparent contradiction to the 143.0143(a) and (g), the coastal development permit approved by the City permits the additions to the home to be sited a distance of 25 feet from the bluff edge when a 40 foot setback should be required pursuant to the LCP. The appellants also contend the proposed development raises questions with regard to determining the life of a structure.

II. Local Government Action.

The coastal development permit was approved by the Hearing Officer on 6/5/02. The conditions of approval address, in part, the following: parking, building height, outdoor lighting, deed restriction for visual corridor in sideyard setbacks and open fencing and landscaping in these areas, required bluff edge setback, and drainage.

III. Appeal Procedures.

After certification of a Local Coastal Program (LCP), the Coastal Act provides for limited appeals to the Coastal Commission of certain local government actions on coastal development permits. Projects within cities and counties may be appealed if they are located within mapped appealable areas. The grounds for appeal are limited to the assertion that "development does not conform to the certified local coastal program." Where the project is located between the first public road and the sea or within 300 ft. of the mean high tide line, the grounds of appeal are limited to those contained in Section 30603(b) of the Coastal Act. Those grounds are that the development does not conform to the standards set forth in the certified local coastal program or the access policies set forth in the Coastal Act.

Section 30625(b) of the Coastal Act requires the Commission to hear an appeal unless it determines that no substantial issue is raised by the appeal. If the staff recommends "substantial issue" and no Commissioner objects, the Commission will proceed directly to a de novo hearing on the merits of the project.

If the staff recommends "no substantial issue" or the Commission decides to hear arguments and vote on the substantial issue question, proponents and opponents will have 3 minutes per side to address whether the appeal raises a substantial issue. It takes a majority of Commissioners present to find that no substantial issue is raised. If substantial issue is found, the Commission will proceed to a full public hearing on the merits of the project. If the Commission conducts a de novo hearing on the permit application, the applicable test for the Commission to consider is whether the proposed development is in conformity with the certified Local Coastal Program.

In addition, for projects located between the sea and the first public road paralleling the sea, Sec. 30604(c) of the Act requires that a finding must be made by the approving agency, whether the local government or the Coastal Commission on appeal, that the development is in conformity with the public access and public recreation policies of Chapter 3. In other words, in regard to public access questions, the Commission is required to consider not only the certified LCP, but also Chapter 3 policies when reviewing a project on appeal.

The only persons qualified to testify before the Commission at the "substantial issue" stage of the appeal process are the applicant, persons who opposed the application before the local government (or their representatives), and the local government. Testimony from other persons must be submitted in writing. At the time of the de novo hearing, any person may testify.

IV. Staff Recommendation On Substantial Issue.

The staff recommends the Commission adopt the following resolution:

MOTION: *I move that the Commission determine that Appeal No. A-6-LJS-02-105 raises NO substantial issue with respect to the grounds on which the appeal has been filed under § 30603 of the Coastal Act.*

STAFF RECOMMENDATION:

Staff recommends a **NO** vote. Failure of this motion will result in a de novo hearing on the application, and adoption of the following resolution and findings. Passage of this motion will result in a finding of No Substantial Issue and the local action will become final and effective. The motion passes only by an affirmative vote of the majority of the appointed Commissioners present.

RESOLUTION TO FIND SUBSTANTIAL ISSUE:

The Commission hereby finds that Appeal No. A-6-LJS-02-105 presents a substantial issue with respect to the grounds on which the appeal has been filed under § 30603 of the Coastal Act regarding consistency with the Certified Local Coastal Plan and/or the public access and recreation policies of the Coastal Act.

V. Findings and Declarations.

1. Project Description/Permit History. Proposed is the remodel of an existing 2,343 sq.ft. one-story single family residence including the construction of a first and second-story addition totaling 810 sq.ft. and demolition of approximately 169 sq.ft. from the first story. The remodeled residence will total 3,109 sq.ft. in two stories. The subject property is a 5,272 sq.ft. blufftop site. The existing residence is located approximately 14 feet from the bluff edge at its closest point. The new additions to the residence are proposed to be sited a distance of 25 feet from the bluff edge. The subject site is located on the west side of Dolphin Place four lots south of Bird Rock Avenue in the community of La Jolla in the City of San Diego. The residences along the seaward site of Dolphin Place are situated on blufftop lots. The bluff fronting the subject site currently is protected with rip rap at its toe and gunite on the upper to 10-20 feet. A portion of the bluff face is exposed between the rip rap and gunite. The shoreline in this area, including that seaward of the subject site, is completely armored with rip rap which was installed by the Army Corp of Engineers pre-dating the Coastal Act. There is a paper street (Sea Rose Lane) at the toe of the coastal bluff seaward of the site which provides lateral public access during low tide conditions. However, it is difficult to gain access to the beach due to the steepness of the bluff. The closest improved vertical accessway is three lots to the north at the end of Bird Rock Avenue.

2. Shoreline Hazards. The appellant contends that the City's approval of the proposed residential remodel and additions on the subject site are inconsistent with the City's certified LCP as it pertains to geologic blufftop setbacks. Specifically, the City approved the new addition to be set back a minimum distance of 25 ft. from the bluff edge. The bluff face of the subject site currently contains rip rap protective devices on the lower ten feet and gunite on the upper to 10-20 feet. The City, through its conditions of approval, acknowledged there were non-conforming uses on the bluff face including the gunite and rip rap. Condition #25 of the City's permit states that these structures are expected to deteriorate over time. The condition further prohibits the applicant from repairing or maintaining the structures.

The appellant contends that the City's approval of the additions proposed to be sited 25 feet from the bluff edge are inconsistent with the certified LCP. Pursuant to the City's certified LCP, all proposed development on a coastal bluff must observe a required setback of 40 feet from the bluff edge unless a site-specific geology report is completed which makes findings that a lesser setback can be permitted. Specifically, Section

143.0143 addressing Development Regulations for Sensitive Coastal Bluffs states the following:

- (f) All *development* including buildings, *accessory structures*, and any addition to existing *structures* shall be set back at least 40 feet from the *coastal bluff edge*, except as follows:
 - (1) The City Manager may permit *structures* to be located between 25 and 40 feet from the bluff edge where the evidence contained in a geology report indicates that the site is stable enough to support the *development* at the proposed distance from the *coastal bluff edge* and the project can be designed so that it will not be subject to or contribute to significant geologic instability throughout the anticipated life span of the primary *structures*, and no shoreline protection is required. Reductions from the 40-foot setback shall be approved only if the geology report concludes the *structure* will not be subject to significant geologic instability, and not require construction of shoreline protection measures throughout the economic life span of the *structure*. In addition, the applicants shall accept a deed restriction to waive all rights to protective devices associated with the subject property. The geology report shall contain:
 - (A) An analysis of bluff retreat and coastal stability for the project site, according to accepted professional standards;
 - (B) An analysis of the potential effects on bluff stability of rising sea levels, using latest scientific information;
 - (C) An analysis of the potential effects of past and projected El Nino events on bluff stability;
 - (D) An analysis of whether this section of coastline is under a process of retreat.
 - (2) *Accessory structures* and landscape features customary and incidental to residential uses shall not be closer than 5 feet to the *coastal bluff edge* provided, however, that these shall be located at *grade*. *Accessory structures* and features may be landscaping, walkways, unenclosed patios, open shade *structures*, decks that are less than 3 feet above grade, lighting standards, *fences* and wall, seating benches, *signs*, or similar *structures* and features, excluding garages, carports, building, pools, spas, and upper *floor* decks with load-bearing support *structures*.

In addition, the City's Coastal Bluffs and Beaches Guidelines, which are a component of the certified LCP, include the above same citation but also contains a footnote at the end of Section 104.0143(f) which states the following:

[Note: If a seawall (or other stabilization/erosion control measure) has been installed due to excessive erosion on a premises, that premises shall not qualify for a reduction of the required 40-foot distance to the coastal bluff edge. Since the instability of the coastal bluff necessitated the installation of the seawall, the coastal bluff would not be considered stable enough to support development within the 40-foot bluff edge setback.] [Emphasis added]

The appellants contend the City's approval of additions to the existing residence which are permitted to be sited a distance of 25 feet from the bluff edge are inconsistent with the above-cited policies of the City's LDC because there is existing shoreline protection on the subject site. The rip rap at the toe of the coastal bluff and the gunite on the bluff face were placed there many years ago, prior to the Coastal Act. According to the City, at the time they were added, the existing home was not threatened and the protection was installed only as a preventive measure, and as such, the above cited LCP provision does not apply. However, when these protective measures were installed, even as a preventative measure, it must have been in response to something. It is likely that the shoreline in this area, at that time, was experiencing "excessive erosion", signified by sloughages and bluff failures on other nearby properties. The placement of riprap and installation of gunite on the bluff face is a significant expense and was likely prompted by some perceived problem occurring along the shoreline at that time, that could have been "excessive erosion". As noted above, the LCP provision does not require that the home be threatened, only that the protection was installed due to excessive erosion, suggesting the site may not be stable enough to support a less than 40 ft. setback. As such, in this particular case, it does not appear a less than 40 ft. blufftop setback should have been permitted.

The findings of the City's permit state that the geologic investigation for the subject site concludes that the existing coastal protective devices are needed for the protection of the existing principal structure, due to its proximity to the coastal bluff edge (approximately 14 feet). However, the new second floor will be constructed on a foundation independent from the existing residence and will observe a minimum 25 ft. bluff edge setback "...predicated on the conclusion that the new construction will not be affected by bluff instability for at least 75 years, taken to be the life of the residence...." The certified Guidelines prohibit exceptions to the 40-foot setback requirement if the site is currently protected by seawalls or other similar measures intended to address excessive erosion. The City's findings relating to the foundation and the life of the residence do not provide a basis for allowing an exception to the 40-foot setback requirement. Appellants have therefore raised a substantial issue regarding the conformity of the proposed development with the blufftop setback requirements of the certified LCP.

On a related point, the appellants also contend that based on testimony by the City geologist at the public hearing for the project, that the entire structure appears to be included in the 75-year life protection period, dated from the approval date of the subject application. The appellants further state that City staff made comments at the public hearing that although the gunite is not needed now for the new addition, it may be needed in the 75 year life span of the structure. The appellants contend that if shoreline

protection is needed to protect the principal structure, but was not needed in the past, then the proposed project should not be granted a reduction to the required 40-foot geologic setback for the new additions. The appellants further assert that the 75 year life of such structures should be dated from the time of original construction for the non-conforming portion of the residence (existing) and contend that the City has applied the 75 year life of the structure to the entire development on the site (both existing and proposed) from the date of the current permit approvals. The appellants contend this is inconsistent with the certified LCP. Although the issue raised by the appellant with regard to determining the economic life of a non-conforming structure (and subsequent additions to it) is not specifically addressed in the certified LCP, it does raise concerns with allowing such structures to remain over time even though they are in a documented hazardous location. Allowing non-conforming structures to remain in a hazardous location could result in the need for more substantial shoreline and bluff protective devices which are inconsistent with the policies of the certified LUP and Implementation Plan which protect public access, natural landforms and the scenic and visual quality of shoreline areas, some of which are cited below:

2. Coastal Bluff Top Development

The shoreline bluffs are one of La Jolla's most scenic natural resources. Beautiful in themselves, the bluffs provide magnificent vistas of the ocean and shoreline. Understandably, these same qualities provide a tremendous incentive to develop bluff top property. Such development, however, is not without its risks. As indicated on the geologic hazards map (page 108), many of the bluff areas are unstable and prone to landslides. Over time, as the bluffs continue to recede, existing developments will become increasingly susceptible to bluff hazards. In many cases, seawalls, revetments, and other types of erosion structures will be required to stabilize the bluff. Such structures, while necessary to protect private property, are poor substitutes for adequate site planning. Improperly placed structures may accelerate erosion on adjacent properties and seriously impact lateral public access. The proliferation of such structures may cumulatively degrade the natural scenic quality of the bluffs and interfere with nature shoreline processes. Where large comprehensive structure such as breakwaters, groins, or revetments are required, the public may ultimately bear the costs. [p. 109]

In order to reduce such problems in the future, the following guidelines have been recommended for all bluff top development located between the first through coastal roadway and the ocean. The guidelines are to be applied to all bluffs having a vertical relief of ten feet or greater and whose toe is or may be subject to marine erosion.... [p. 109]

Development Guidelines

- A geotechnical report will be required for all bluff top development proposed to be sited within a critical distance from the edge of the bluff, described as the "area of demonstration."... [p. 109]

- The geotechnical report, prepared by a certified engineering geologist, should document that the “area of demonstration” is stable enough to support the proposed development and that the project can be designed so that it will neither be subject to nor contribute to significant geologic instability throughout the estimated lifespan of the project structures. [p. 110]
- Bluff top development should be visually compatible with the scale and character of the surrounding development and respectful of the natural scenic qualities of the bluffs. Structures should be sited and designed to minimize alteration of natural landforms. [p. 110]
- Bluff top developments should not contribute significantly to problems of erosion or geologic instability on the site or on surrounding properties. This includes activities related to site preparation and construction. [p. 110]

The appellants further assert that such interpretations of the City’s code could result in a cumulative impact if such exceptions were granted to additional blufftop development consisting of similar additions to existing non-conforming residences. In other words, if such exceptions to the 40-foot setback are granted for future additions to other non-conforming residential structures, this could set an adverse precedent. Over time, this could result in blufftop development being approved closer to the bluff edge in a location that has been documented to be hazardous. The appellant has therefore raised a substantial issue regarding the conformity of the development with the policies of the certified LCP.

SITE

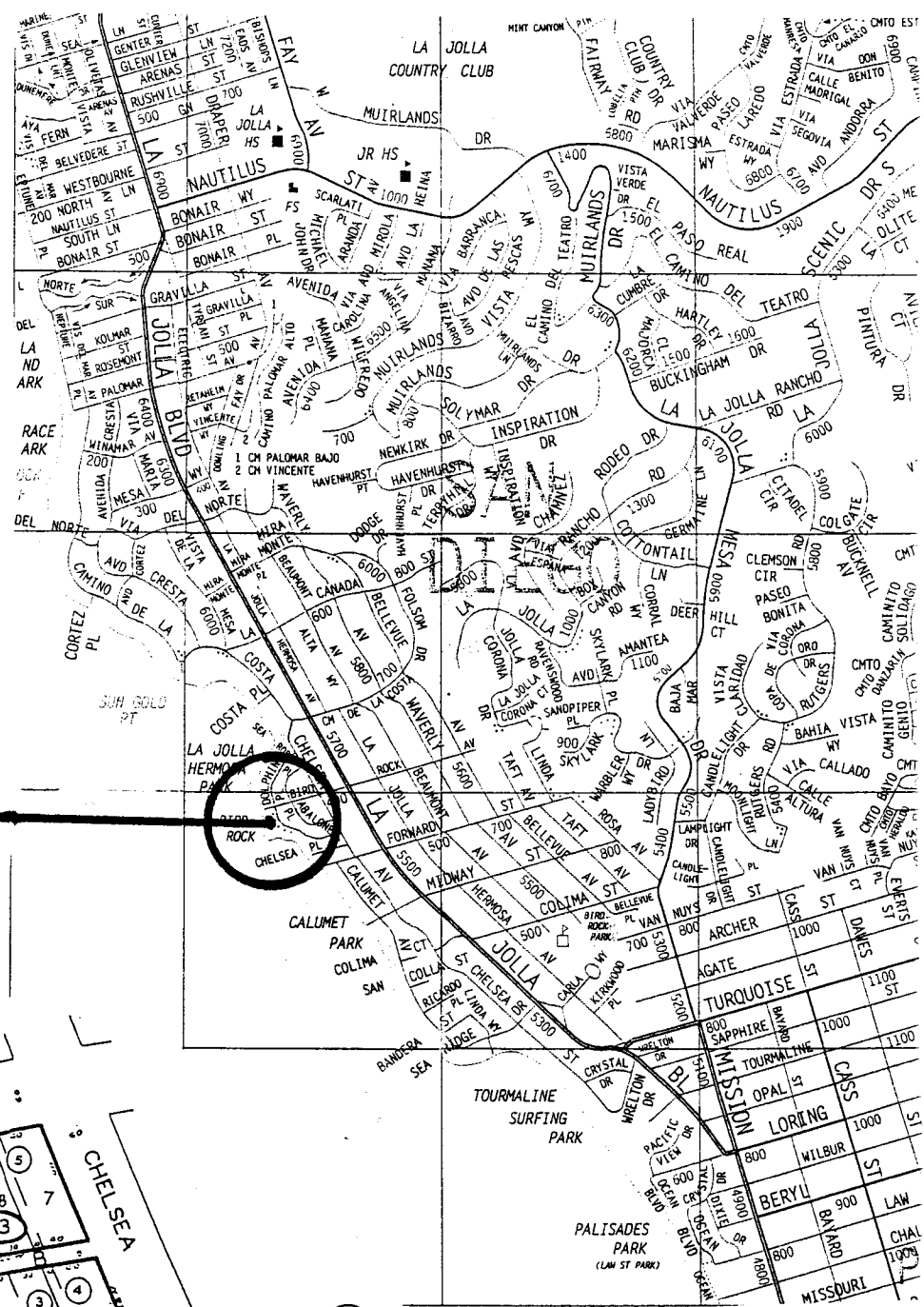
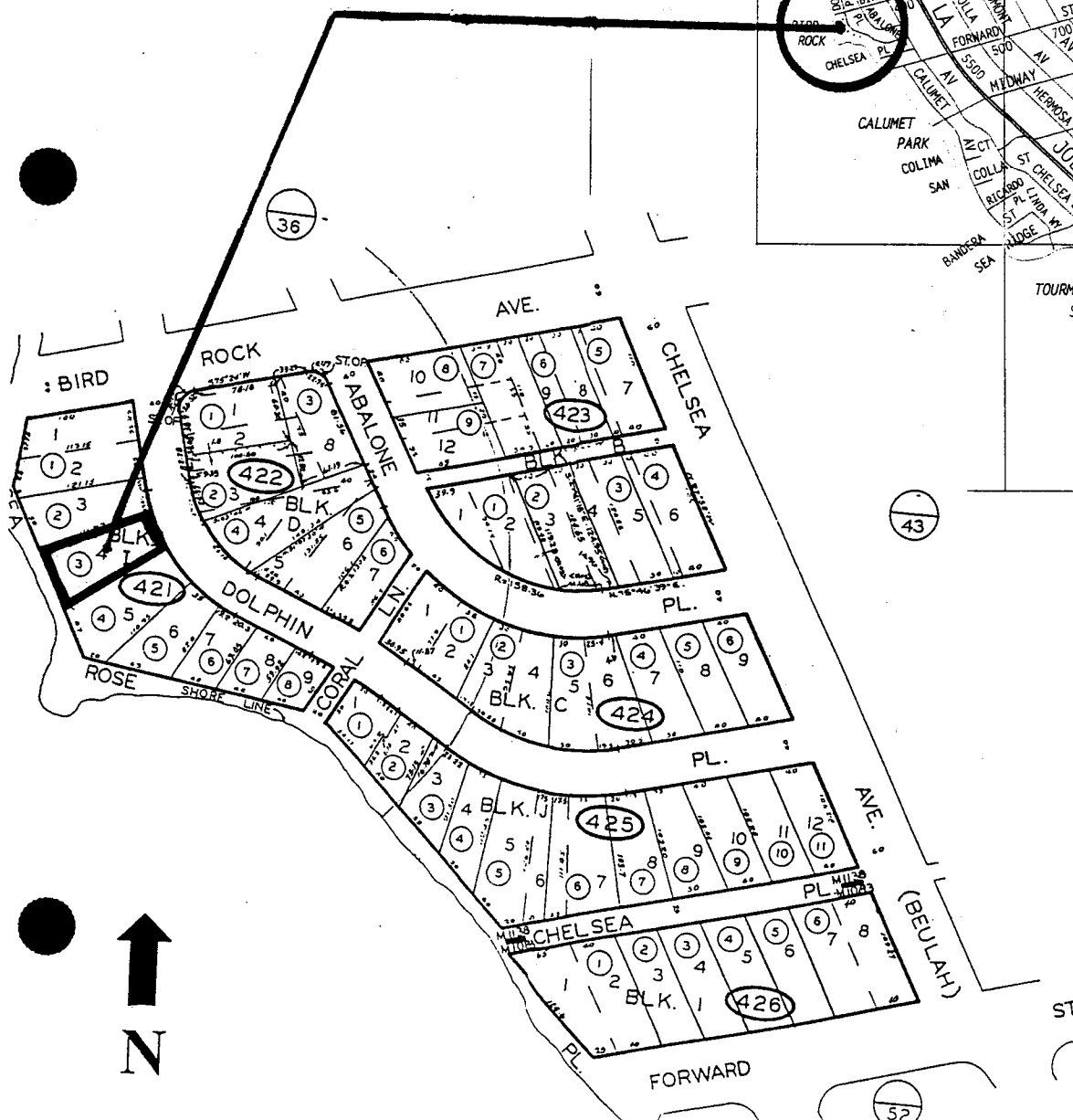
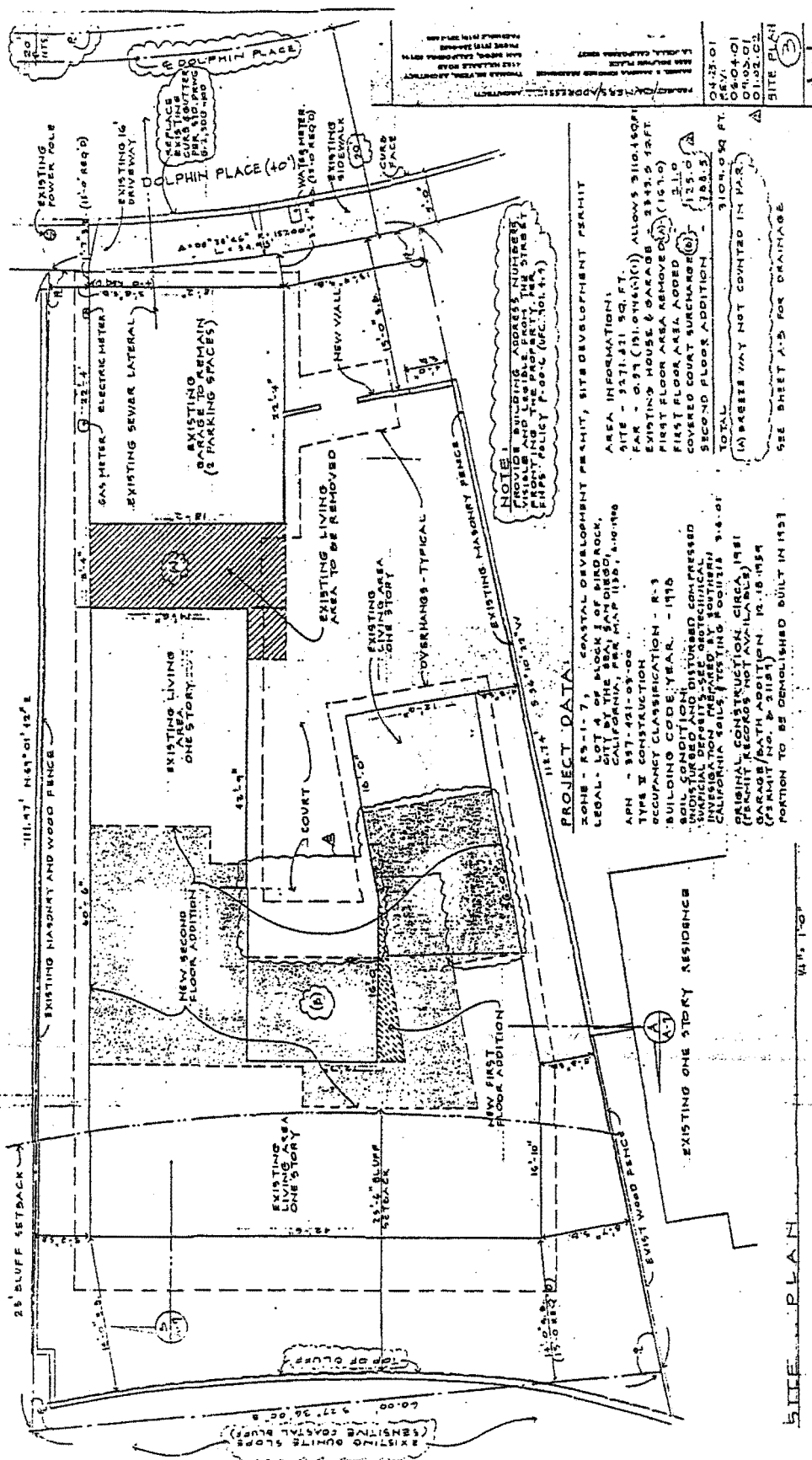


EXHIBIT NO. 1
APPLICATION NO.
A-6-LJS-02-105
Location Map
California Coastal Commission



CALIFORNIA COASTAL COMMISSION

SAN DIEGO AREA

7575 METROPOLITAN DRIVE, SUITE 103

SAN DIEGO, CA 92108-4402

(619) 767-2370

RECEIVED



JUL 19 2002

APPEAL FROM COASTAL PERMIT
DECISION OF LOCAL GOVERNMENTCALIFORNIA
COASTAL COMMISSION
SAN DIEGO COAST DISTRICTPlease Review Attached Appeal Information Sheet Prior To Completing
This Form.SECTION I. Appellant

Name, mailing address and telephone number of appellant:

La Jolla Town Council
7734 Herschel Ave., Suite F
La Jolla, CA 92037 (858) 454-1444
Zip Area Code Phone No.

SECTION II. Decision Being Appealed1. Name of local/port
government: City of San Diego2. Brief description of development being
appealed: CDD/SDP for remodel existing 1 story SF residential
unit and construct 1st + 2nd story additions to existing structure
on independent foundation on a site with existing shoreline protection.3. Development's location (street address, assessor's parcel
no., cross street, etc.): 5680 Dolphin Place, La Jolla, Lot 4, Block "I"
Resubdivision of a portion of Bird Rock by The Sea, Map No. 1138

4. Description of decision being appealed:

- a. Approval; no special conditions: _____
- b. Approval with special conditions: X
- c. Denial: _____

Note: For jurisdictions with a total LCP, denial
decisions by a local government cannot be appealed unless
the development is a major energy or public works project.
Denial decisions by port governments are not appealable.

TO BE COMPLETED BY COMMISSION:

APPEAL NO: A-6-LJS-02-105DATE FILED: 7/16/02DISTRICT: San DiegoEXHIBIT NO. 3
APPLICATION NO.

A-6-LJS-02-105

Appeal

California Coastal Commission

APPEAL FROM COASTAL PERMIT DECISION OF LOCAL GOVERNMENT (Page 2)

5. Decision being appealed was made by (check one):

- a. ☒ Planning Director/Zoning Administrator c. ☐ Planning Commission
b. ☐ City Council/Board of Supervisors d. ☐ Other _____

6. Date of local government's decision: JUNE 5, 2002

7. Local government's file number (if any): CDP 6482; SDP 6483
Job Order # 41-0463
Project # 1094

SECTION III. Identification of Other Interested Persons

Give the names and addresses of the following parties. (Use additional paper as necessary.)

a. Name and mailing address of permit applicant:

Daniel + Sandra Kindred
5680 Dolphin Place
La Jolla, CA 92037

b. Names and mailing addresses as available of those who testified (either verbally or in writing) at the city/county/port hearing(s). Include other parties which you know to be interested and should receive notice of this appeal.

- (1) _____

(2) _____

(3) _____

(4) _____

SECTION IV. Reasons Supporting This Appeal

Note: Appeals of local government coastal permit decisions are limited by a variety of factors and requirements of the Coastal Act. Please review the appeal information sheet for assistance in completing this section, which continues on the next page.

APPEAL FROM COASTAL PERMIT DECISION OF LOCAL GOVERNMENT (Page 3)

State briefly your reasons for this appeal. Include a summary description of Local Coastal Program, Land Use Plan, or Port Master Plan policies and requirements in which you believe the project is inconsistent and the reasons the decision warrants a new hearing. (Use additional paper as necessary.)

Please see attached sheet.

Note: The above description need not be a complete or exhaustive statement of your reasons of appeal; however, there must be sufficient discussion for staff to determine that the appeal is allowed by law. The appellant, subsequent to filing the appeal, may submit additional information to the staff and/or Commission to support the appeal request.

SECTION V. Certification

The information and facts stated above are correct to the best of my knowledge.

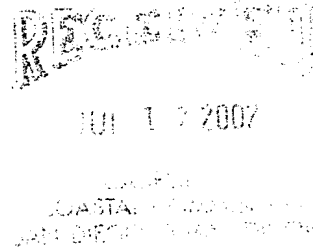
Signed James H. Pearson for Sherri Lightner
Appellant or Agent

Date ~~7-9-02~~ 7-9-02

Agent Authorization: I designate the above identified person(s) to act as my agent in all matters pertaining to this appeal.

Signed _____
Appellant

Date _____



California Coastal Commission
San Diego Coast Area
7575 Metropolitan Drive, Ste. 103
San Diego, CA 92108-4402

July 17, 2002

Via Facsimile: (619) 767-2384

Subject: City of San Diego LDR No. 41-0463, PTS No. 1094, Kindred Residence CDP/SDP

The La Jolla Town Council requests Commission consideration of the following clarifications of our Reasons For Appeal submitted July 9, 2002. Language submitted in addition to our July 9, 2002, appeal is in bold italic format for ease of comparison.

We respectfully ask the Commission to find Substantial Issue based on lack of conformance with the certified LCP, as well as Cumulative Impacts to the LCP from the City of San Diego's approval of a significantly larger nonconforming principal residence with existing rip rap and an unpermitted partially gunnited bluff, which would increase the value of the structure with inadequate geologic bluff edge setbacks, and would extend the lifetime protection of the existing nonconforming structure for another 75 years. The City is currently approving similar reduced bluff edge setbacks on other shoreline applications, thus creating a de facto LCP amendment in conflict with certified LCP setback requirements.

LA JOLLA TOWN COUNCIL REASONS FOR APPEAL

JULY 9, 2002

1. EXCEPTIONS TO THE REQUIRED 40' BLUFF EDGE SETBACK ARE NOT SUPPORTED BY THE LAND DEVELOPMENT CODE OR GUIDELINES.

The existing residence is located 14' from the bluff edge, with shoreline protections which include a partially gunnited bluff and rip rap along the shoreline base of the bluff. The City's approval of the project would allow exceptions to Land Development Code setback requirements by allowing additions to the residence to be located 25' from the bluff edge where 40' appear to be required by LDC 143.0143 (f) and (i) and Coastal Bluffs and Beaches Guidelines Section II C., page 5.

In particular, the LDC sections require conformance with the Guidelines, which specify in part that "if a seawall (or other stabilization/erosion control measure) has been installed due to excessive erosion on a premises, that premises shall not qualify for a reduction of the required 40-foot distance to the coastal bluff edge."

The "Independent Foundation" exception is not supported by certified LCP regulations: In addition, the project would allow the setback exceptions based on the additions being constructed on a foundation independent from the nonconforming existing structure. We can find no provision in the LDC for such an exception.

CUMULATIVE IMPACTS: The City's "Independent Foundation" and "Excessive Erosion" interpretations appear to be de facto amendments to the LCP bluff edge setback requirements cited above. In fact, the City's finding that "excessive erosion" is applied solely to properties that have obtained a California Coastal Commission permit for shoreline protective devices would punish property owners who apply for Coastal permits, while rewarding those who install devices without permits, as on this site. Illegal erosion control devices are referred to by the City as "prophylactic."

EXHIBIT NO. 4
APPLICATION NO.
A-6-LJS-02-1
Letter From
Appellant
California Coastal Commission

RECEIVED

JUL 17 2002

CALIFORNIA
COASTAL COMMISSION
SAN DIEGO COAST DISTRICT

and are thus used to justify current geologic determinations that support reduced bluff edge setbacks for expansion of nonconforming structures.

We believe the City's positions would adversely impact the entire San Diego shoreline through approvals that conflict with certified LCP bluff edge setback regulations.

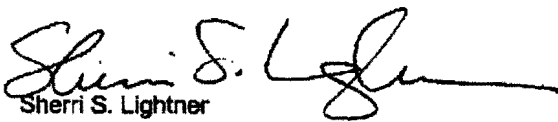
Although local Coastal staff has written letters of concern to the City on this project, as well as another currently in the City's pipeline, there appears to have been no change in the City's position. We believe the LCP sections cited above are clear that expansion of nonconforming structures with shoreline stabilization or erosion control measures installed to prevent excessive erosion on the premises should not qualify for bluff edge setback reductions.

2. LIFE OF THE STRUCTURE:

Based on testimony by the City Geologist, the decision of the Hearing Officer would include the entire structure in the 75-year life protection period, and would be dated from the approval date of the current application. The City's approval would not require removal of the existing gunnite because, although the geologist does not believe it is currently necessary to protect the existing structure, the gunnite would likely be needed at some point during the 75 year life of the structure. ***If the riprap and gunnited bluff are not needed currently to protect the principal structure, but were in the past and will be in the future, then what justification exists for reduced bluff edge setbacks? And what reason would support an added 75-year life for the existing nonconforming structure?*** We can find no LDC provision supporting these interpretations, and therefore, request Commission clarification.

CUMULATIVE IMPACT: We believe the City's interpretation would increase the state and public responsibility for supporting shoreline protection for nonconforming structures far beyond what the LCP and Coastal Act envision. We suggest the 75 years life of such structures should properly date from the time of original construction of the on-site residence. Nor can we find LCP provisions that allow a 75 year life to be bifurcated, either to allow a 75 year life for the entire on-site development from the permit date of the newly expanded portion of the nonconforming structure, or to allow expansions to nonconforming structures with reduced bluff setbacks to be dated from the date of current permit approvals.

The La Jolla Town Council greatly appreciates the Commission's consideration of these significant and troubling coastal issues.


Sherri S. Lightner
President

xc: LJTC Files
LJTC Land Use Chair

