

**CALIFORNIA COASTAL COMMISSION**

SAN DIEGO AREA  
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# F 10c

Filed: 3/12/07  
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Staff: Laurinda Owens-SD  
Staff Report: 4/19/07  
Hearing Date: 5/9-11/07

AMENDMENT REQUEST  
STAFF REPORT AND PRELIMINARY RECOMMENDATION

Application No.: A-6-LJS-02-058-A2

Applicant: City of San Diego, Engineering  
& Capital Improvements

Agent: Sheila DeGuzman

Original Description: Abandonment of existing sewer pump station, removal of an adjacent wastewater settling tank and construction of a new 1,200 sq.ft. pump station; construction and replacement of a portion of existing force main; installation of new parallel force main; construction of sewer influent line; removal and replacement of existing storm drainage line; replacement of existing coastal access stairway; expansion of the observation point and viewing area and reconfiguration and augmentation of existing rip rap revetment.

Proposed Amendment: Replacement, after-the-fact, of approved landscaping on the coastal bluff face with hardscape erosion control measures (shotcrete). Also proposed is coloring and texturing of the shotcrete surface to replicate the character, color and texture of the existing native sandstone bluffs in the area. The project also includes a modification to Special Condition No. 3 to allow work to occur during the summer between Memorial Day weekend and Labor Day.

Site: Western terminus of Bird Rock Avenue (public right-of-way), La Jolla, San Diego, San Diego County. (No APN)

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STAFF NOTES:

Summary of Staff's Preliminary Recommendation:

Staff is recommending approval of the proposed project, with special conditions. The primary issues raised by the proposed development relate to protection of visual resources and public access. The proposed amendment involves changes to the approved landscaping condition which required that drought tolerant native or naturalizing plant materials be used on the bluff face with a provision that no invasive or noxious plant materials be used and that the vegetation not block views to the ocean. Once construction

began, the applicant revised the project to eliminate the landscaping and instead installed a shotcrete application over the entire bluff face. While the applicant has documented the need for the shotcrete application to assure stability of the approved pump station as well as the adjacent residential developments, staff is not convinced that some landscaping can not be installed. Therefore, staff is recommending that the City install 6-8 planter boxes and/or vine wells consisting of native, salt-tolerant landscaping that will thrive without irrigation in order to add some “greenery”, enhancing the visual appearance and minimizing the mass of the shotcrete on the entire bluff face in this oceanfront area. The vegetation is required to be installed above the design wave height line. With the special conditions, the proposed amendment is consistent with all applicable provisions of the certified LCP.

Standard of Review: Certified City of San Diego Local Coastal Program and the public access and recreation policies of the Coastal Act.

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Substantive File Documents: Letters from City of San Diego Engineering Dept. dated 3/15/07, 1/18/07 and 9/22/06; Geotechnical Report by Group Delta Consultants dated 1/10/07; La Jolla Community Plan and Local Coastal Program Land Use Plan (February 2004).

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**I. PRELIMINARY STAFF RECOMMENDATION:**

The staff recommends the Commission adopt the following resolution:

**MOTION:**     *I move that the Commission approve the proposed amendment to Coastal Development Permit No. A-6-LJS-02-058 pursuant to the staff recommendation.*

**STAFF RECOMMENDATION OF APPROVAL:**

Staff recommends a **YES** vote. Passage of this motion will result in approval of the amendment 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 A PERMIT AMENDMENT:**

The Commission hereby approves the coastal development permit amendment on the ground that the development as amended and subject to conditions, will be in conformity with the policies of certified local coastal program and the public access and recreation policies of Chapter 3 of the Coastal Act. Approval of the permit amendment 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 amended development on the environment, or 2) there are no feasible mitigation measures or alternatives that would substantially lessen any significant adverse impacts of the amended development on the environment.

## II. Special Conditions.

The permit is subject to the following conditions:

**The following condition replaces Special Condition #8 of the original permit in its entirety.**

1. Landscaping Plan. **PRIOR TO THE ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT AMENDMENT**, the applicant shall submit a detailed landscape plan indicating the type, size, extent and location of all plant materials, to be installed above the design wave height line to add softness and minimize the mass of the concrete on the bluff face. Said landscaping shall include, at a minimum, approximately 6-8 vine wells or planter boxes. Proposed vegetation shall be native, salt-tolerant landscaping that will thrive without irrigation. No invasive or noxious plant materials shall be used. Said plan shall be submitted to, reviewed and approved in writing by the Executive Director. The plans shall also include the following:

- a. Said landscaping shall be installed within 60 days of Commission action on this coastal development permit amendment.
- b. A written commitment by the applicant that five years from the date of the issuance of the coastal development permit amendment for this landscaping, the applicant will submit for the review and written approval of the Executive Director, a landscape monitoring report, prepared by a licensed Landscape Architect or qualified Resource Specialist, that certifies whether 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 amendment, 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 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 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 legally required.

2. Prior Conditions of Approval. All other terms and conditions of Coastal Development Permit No. A-6-LJS-02-58, as amended, not specifically modified herein, shall remain in full force and effect.

**The following condition replaces Special Condition #3 of the original permit in its entirety.**

3. Storage and Staging Areas/Access Corridors. **PRIOR TO THE ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT AMENDMENT**, the applicant shall submit to the Executive Director for review and written approval, final plans indicating the location of access corridors to the construction site and staging areas. The final plans shall indicate that:

- a) No overnight storage of equipment or materials shall occur on sandy beach .
- b) During the period between Memorial Day weekend and Labor Day, construction activities, contractor and sub-contractor staging areas and vehicle parking shall be permitted. However, no work shall be permitted on weekends and holidays during this time period.

The permittee shall undertake the 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 a Coastal Commission approved amendment to this coastal development permit, unless the Executive Director determines that no amendment is legally required.

**The following special conditions are added as new special conditions to the original permit:**

4. Future Maintenance and Monitoring of Shotcrete on Bluff Face. The permittee shall maintain the existing shotcrete on the bluff face in its approved state. Any maintenance or future additions/reinforcement of the shotcrete beyond exempt maintenance as defined in Section 13252 of Title 14 of the California Code of Regulations to restore the structures to their original condition will require a coastal development permit. **However, in all cases, if after inspection, it is apparent that repair and maintenance is necessary, the permittee shall contact the Executive Director to determine whether a coastal development permit or an amendment to this permit is legally required, and, if required, shall subsequently apply for a coastal development permit or permit amendment for the required maintenance.**

5. Condition Compliance. Within 60 days of Commission action on this coastal development permit amendment, or within such additional time as the Executive Director may grant for good cause, the applicants shall satisfy all requirements specified in the conditions hereto that the applicants are required to satisfy prior to issuance of this permit. Failure to comply with this requirement may result in the institution of enforcement action under the provisions of Chapter 9 of the Coastal Act.

### III. Findings and Declarations.

The Commission finds and declares as follows:

1. Project History/Amendment Description. The proposed project is an amendment to CDP #A-6-LJS-02-58, approved on 11/7/02, which was for the abandonment of an existing sewer pump station, removal of an adjacent wastewater settling tank and the construction of a new 1,200 sq. ft. subterranean pump station in the location of an existing 1920's era wastewater settling tank on the face of a coastal bluff. Also proposed was grading of the bluff face north of the existing pump station to accommodate a ventilation system for the new pump station, construction and replacement of a portion of an existing force main, construction of a new parallel force main and removal and replacement of an existing storm drain. An existing public beach access stairway was also reconfigured with a design that had fewer landings and only two flights of steps. In addition, portions of an existing rip rap revetment at the toe of the existing public access stairway were reconfigured and augmented such that rip rap was placed with a flat surface on top to facilitate public access as well as expansion of an observation point and viewing area at the street-end immediately above the pump station.

In June, 2005, CDP #A-6-LJS-02-58-A1 was approved as an immaterial amendment to allow construction to occur during the summer of 2005, by amending Special Condition #3(c) to permit construction activities through the summer season of 2005 and to also permit construction on the beach between Memorial Day weekend and Labor Day 2005.

The subject amendment request is to permit, after-the-fact, the placement of shotcrete on the bluff face in lieu of the landscaping that was originally approved to be planted pursuant to Special Condition #8 of the original coastal development permit (ref. Exhibit No. 3). Also proposed is the application of "boulderscape" to the existing shotcrete which will include sculpting and colorization to match the surrounding natural coastal bluffs. Last, the City is proposing to modify Special Condition #3 of the original coastal development permit such that work shall be permitted to occur during the summer months.

The project site consists of the public right-of-way and face of the coastal bluff and beach at the western terminus of Bird Rock Avenue (near Dolphin Avenue) in the La Jolla community of the City of San Diego. At the foot of the existing public access stairway there is existing rip rap on the beach. An existing concrete block seawall exists on the bluff face to the north of the pump station/stairway and a gunite coating exists on the bluff face to the south of the pump station/stairway.

2. Unpermitted Development. Unpermitted development has been carried out on the subject site. The applicant is requesting after-the-fact approval for the placement of shotcrete on the bluff face in lieu of the required landscaping pursuant to Special Condition #8 of the original coastal development permit. To ensure that the matter of unpermitted development is resolved in a timely manner, **Special Condition #5** requires

that the applicant satisfy all conditions of this permit, which are prerequisite to the issuance of this permit, within 60 days of Commission action, or within such additional time as the Executive Director may grant for good cause.

Although placement of shotcrete on the bluff face has taken place in violation of the permit conditions of this permit application, consideration of this amendment application by the Commission has been based solely upon the Chapter 3 policies of the Coastal Act. Review of this permit does not constitute a waiver of any legal action with regard to the alleged violation nor does it constitute an admission as to the legality of any development undertaken on the subject site without a coastal permit.

3. Visual Resources/Alteration of Landforms/Scenic Quality. Section 30251 of the Coastal Act states the following:

The certified La Jolla Community Plan and Local Coastal Program Land Use Plan contains the following policies:

“The City should preserve and protect the coastal bluffs, beaches and shoreline areas of La Jolla assuring that development occurs in a manner that protects these resources, encourages sensitive development, retains biodiversity and interconnected habitats and maximizes physical and visual public access to and along the shoreline.”

“Avoid the placement of seawalls, fences and gunite on bluffs, where feasible, in order to preserve the natural and scenic quality of shoreline bluffs. Where the use of such improvements is unavoidable, design and site the improvements to incorporate surrounding land form characteristics in order to blend the new with the existing.

"Conserve and enhance the natural amenities of the community such as its views from identified public vantage points (as identified in Figure 9), ...ocean, beaches, water quality, bluffs....”

Bird Rock Avenue is a designated public view corridor in the certified La Jolla Community Plan and Local Coastal Program Land Use Plan. The former pump station and public accessway was a concrete mass painted a bright blue as viewed from the west on the coastal bluff. The City intended to improve its visual appearance by resurfacing the structure with materials to visually enhance the structure and to match the surrounding coastal bluffs (earth/tan tone). In addition, as was noted in the original project, there was iceplant on the bluff face both to the north and south of the existing pump station. The City had indicated that this vegetation would be removed and replaced with new vegetation. The City was also proposing to grade a small portion of the bluff face north of the sewer pump station where ventilation ducts were proposed to be installed. In order to assure that any proposed landscaping on the bluff face for purposes of retarding erosion, etc., was a native species compatible with the natural environment, Special Condition #8 of the original permit required that any new proposed landscaping be a native, drought-tolerant and non-invasive or noxious plant species.

However, after the City began construction of the sewer pump station, a change in the field was made to the proposed landscaping and instead shotcrete was applied on the bluff face. According to the City, when they initially designed the new sewer pump station they did not anticipate the steepness of the slope and that during construction it became necessary to also install shoring for the pump station. These changes resulted in the City reconsidering their original intention to install landscaping on the bluff face. In a letter dated 9/22/06, the City indicated that the long-term stability of the slopes adjacent to the pump station was a great concern to the City's landscape architect, engineers, project designer and local residents. The City also acknowledged that planting native plants in a disturbed area is an appropriate method to mitigate impacts and minimize soil erosion and that it was their original intent to replace the ice plant with native plants on the coastal bluff. However, when construction commenced it became apparent that there was extensive disturbance at the site based on the appearance of the restored bluff, and a decision was made not to use landscaping because it could potentially lead to increased soil erosion and slope failure, as well as property damage to the adjacent residential lot to the south. There was also a concern that plantings would require supplemental irrigation to become established in a short period of time. This could possibly load the restored slope with sub-grade water, which adds extra weight, which can then slide and lead to a slope failure. The City indicated that no matter how well compacted the slope is, it is still disturbed soil that does not have the same cohesion as native, undisturbed soil, which makes it more susceptible to erosion caused by water runoff, wind, foot traffic and tidal action.

The City further indicated that the use of shotcrete was also necessary to secure a 30-inch reinforced concrete storm drain pipe outlet in place. The City indicated that without the shotcrete, it would be only a matter of time before the pipe would fail and break away due to tidal action and loss of embankment. As such, shotcrete was placed at the base of all restored excavated areas for structural support. It was also placed on the permanent shoring system that was left-in-place to support a vertically cut slope to house the pump station structure. It included weep boards, filter sheets, and a perforated PVC drainage pipe to help drain water and prevent building of hydrostatic pressure. According to the City, without the shotcrete, the left-in-place shoring made of wood would deteriorate and once deteriorated, the vertically cut soil next to the property to the south of the pump station would likely fail. Therefore, the City believed that the use of shotcrete was the most effective measure to provide the needed long-term stability to the coastal bluff.

In order to determine if the proposed after-the-fact shotcrete is the least environmentally-damaging method for addressing the concerns identified by the City, the City was asked to address a number of alternatives. The alternatives included: (1) remove the shotcrete altogether and replace it with vegetation on the bluff as was originally permitted; (2) employ some other method of anchoring the storm drain pipe in lieu of shotcrete; and, (3) address removing the upper portions of shotcrete separately from the stabilizing shotcrete and consider alternatives for each.

With regard to removal of the shotcrete, the City believed if the shotcrete were removed they would have to install another more extensive stabilizing system which might even include additional rip rap, which would not be considered the least environmentally damaging alternative. The City's desire to retain the gunite and why they believe it is necessary, is discussed in their analysis that distinguishes between the "stabilizing" shotcrete and the "landscaping" shotcrete below.

With regard to alternatives to anchoring the storm drain pipe, in a letter dated 1/18/07, the City stated that the existing storm drain pipe requires anchoring to stabilize the pipe from sliding down the bluff by gravity under its own weight as well as damage from tidal action and wave attack. The anchoring required is a "horseshoe" collar or a "U" shaped steel reinforcing band to be installed around the pipe and into the shotcrete covered rip rap.

The area for the shotcrete is divided into "stabilizing" shotcrete, which consists of the shotcrete that is up to the design wave height elevation (ref. Exhibit No. 4). The geotechnical engineer for the project has determined that the design wave height elevation is 22.5' above mean sea level (MSL). It was determined by the City's consulting geotechnical engineer that armoring is required up to the design wave height elevation to protect the sewer pump station from the damaging impacts of tidal action and wave attack. The armoring that was used is the rip rap at the base and shotcrete along the sides (as has been installed).

The "landscaping" shotcrete was determined to be the finish slopes above the design wave height elevation which were considered too steep to be protected from erosion with landscape plant material and therefore a hardscape solution was required. The City also consulted with their biologist and water and sewer design division senior planner who confirmed that landscaping should not be placed on the coastal bluff. The City has indicated that the main concern is that the existing shotcrete, whether or not above the design wave height elevation, should not be compromised in its entirety. The City believed that if the landscaping shotcrete were removed, this would compromise the integrity of the stabilizing shotcrete by allowing water seepage through the soil.

The City was also asked if they could cut and grade back the top of the bluff slightly (so that it would not be so steep) which might facilitate the ability to install vegetation there. However, the City's engineer stated that they could not slope back because it is almost cut vertically to the property line and there is only a short depth between the surface and the pump station, which is buried below the surface. There is no bluff to cut back. The short depth is another reason why the root stock would not hold or thrive if plants were placed there. The City's engineer further noted that the removal of shotcrete above the drain system and filling it with soil for vegetation would have a detrimental affect as it would hydrostatically load the concrete that is left in place at the lower elevation on the bluff because water could infiltrate behind the shotcrete and compromise it.

In addition, the City also noted that there was no native vegetation near the structure. They pointed out that the closest natural bluff face in the area was primarily non-

vegetated, as result of steepness of the bluff and soil erosivity and that the only vegetation on the bluff next to the site was iceplant. They further noted that the bluff next to the site was already gunited on both sides.

The City has also noted that any proposed landscaping on the bluff face would require irrigation to thrive and the root stock would be so shallow that it would not take hold or thrive. In addition, the City does not have adequate personnel to maintain such vegetation.

Based on the City's alternatives analysis, the City determined that the shoring must be left in place as well as the shotcrete application to stabilize the storm drain pipe and protect the adjacent property. As such, the City determined the shoring and shotcrete to be the least environmentally damaging alternatives available at this point in time (as opposed to the placement of additional rip rap at the site, etc.). The Commission's staff coastal engineer has reviewed the City's analysis and technical reports and concurs that the shotcrete must be left in place.

However, due to the extent of shotcrete that is on the bluff face, the Commission remains concerned with the visual appearance of this facility. To partially address this concern, the City has proposed to treat the shotcrete with a colored and textured application to give the shotcrete a more natural appearance. While the Commission acknowledges that such a treatment does help to reduce the "unnatural" appearance of the facility, it still does not entirely address the visual impacts (ref. Exhibit No. 6). When viewing photographs of the former sewer pump station and the way that it looked before the new pump station was constructed (ref. Exhibit No. 5), it can be seen that there was extensive vegetation (mainly iceplant) on the bluff face. While iceplant is non-native, the greenery that it added to the bluff face visually enhanced this concrete structure on the coastal bluff face. As can be seen, the greenery greatly improves the visual appearance of this bluff face. The coastal bluff is visible from offshore (from boats and by swimmers and surfers) as well as from the southern terminus of Camino de la Costa to the north which is designated as a major public viewshed in the certified LCP La Jolla Land Use Plan because it provides panoramic public views of this entire shoreline.

While the Commission agrees that in this particular case the shotcrete should not be removed and replaced with irrigated landscaping, there still are other alternatives such as vine wells or planter boxes that could be used and placed above the design wave height of the bluff face/sewer pump station that could help to soften the impacts of all the concrete and help to reduce the visual appearance of the facility. Planters or vine wells could be installed utilizing species of plants that are native, drought-tolerant, non-invasive and which are also salt-tolerant such that they could thrive without irrigation. There are numerous such plants all along Ellen Scripps Park in the La Jolla community on the coastal bluffs which are subject to wave splash year-round and thrive. With incorporation of such planting at this location, over time, such plants may grow and cascade down the bluff, softening the effect of the shotcrete on the bluff face and helping to minimize the impacts associated with the proposed alteration of the natural landform, consistent with the above cited LCP provisions. Therefore, Special Condition #1 requires

that the City submit a detailed landscape plan which includes plant materials to be installed above the design wave height line to add softness and minimize the mass of the concrete on the bluff face. Said landscaping shall include approximately 6-8 vine wells or planter boxes. Proposed vegetation shall be native, salt-tolerant landscaping that will thrive without irrigation. No invasive or noxious plant materials shall be used.

In addition, the applicant shall perform annual maintenance and monitoring of the shotcrete on the bluff face to assure that seepage or water intrusion does not occur or damage the shotcrete resulting in cracks or separation. Therefore, Special Condition #3 requires that any maintenance or future additions/reinforcement of the shotcrete beyond exempt maintenance, as defined in Section 13252 of Title 14 of the California Code of Regulations, to restore the shotcrete to its original condition will require a coastal development permit. Therefore, in summary, with incorporation of vine wells or planter boxes on the bluff face (which will grow over time and may cascade down the bluff), the added landscaping/greenery will visually enhance the appearance of the gunited bluff face. Coupled with the boulderscape which will include sculpting and coloring to match the coastal bluffs, the scenic quality of this area will be significantly improved. As conditioned, the proposed development is consistent with the visual resource policies of the certified LCP.

4. Public Access. The following sections of the Coastal Act are applicable and state:

Section 30211

Development shall not interfere with the public's right of access to the sea where acquired through use or legislative authorization, including, but not limited to, the use of dry sand and rocky coastal beaches to the first line of terrestrial vegetation.

Section 30212

(a) Public access from the nearest public roadway to the shoreline and along the coast shall be provided in new development projects except where:

[...]

(2) Adequate access exists nearby, or, ....

In addition, the certified La Jolla Community Plan and Local Coastal Program Land Use Plan contains the following applicable policies:

“Maintain, and, where feasible, enhance and restore existing facilities including streets, public easements, stairways, pathways and parking areas in order to provide adequate public access to the shoreline. Detailed maps and specific subarea recommendations are provided in Appendix G.”

“The City shall maintain, and where feasible, enhance and restore existing parking

areas, public stairways, pathways and railings along the shoreline to preserve vertical access (to the beach and coast), to allow lateral access (along the shore), and to increase public safety at the beach and shoreline areas. No encroachment into the public right-of-way should be permitted within the Coastal Zone without a permit.”

As part of the subject amendment to visually treat the shotcrete by applying a colored and textured application over the shotcrete on the bluff face, the City will need to complete this work as soon as possible. Given the timing of construction, in anticipation of approval at the May Commission meeting, the proposed construction work may need to extend into the summer season when typically a construction moratorium is imposed to avoid impacts to public access (typically between Memorial Day weekend and Labor Day). Although the City had obtained a previous immaterial amendment to allow work to occur during the summer season, that amendment only extended the work through Labor Day of 2005. As such, the original conditions of approval still apply which require that no construction on the beach shall occur between Memorial Day weekend and Labor Day. The applicant has indicated that they estimate the work to take approximately seven working days. During that time frame they will utilize approximately five parking spaces between Bird Rock Avenue and Dolphin Place.

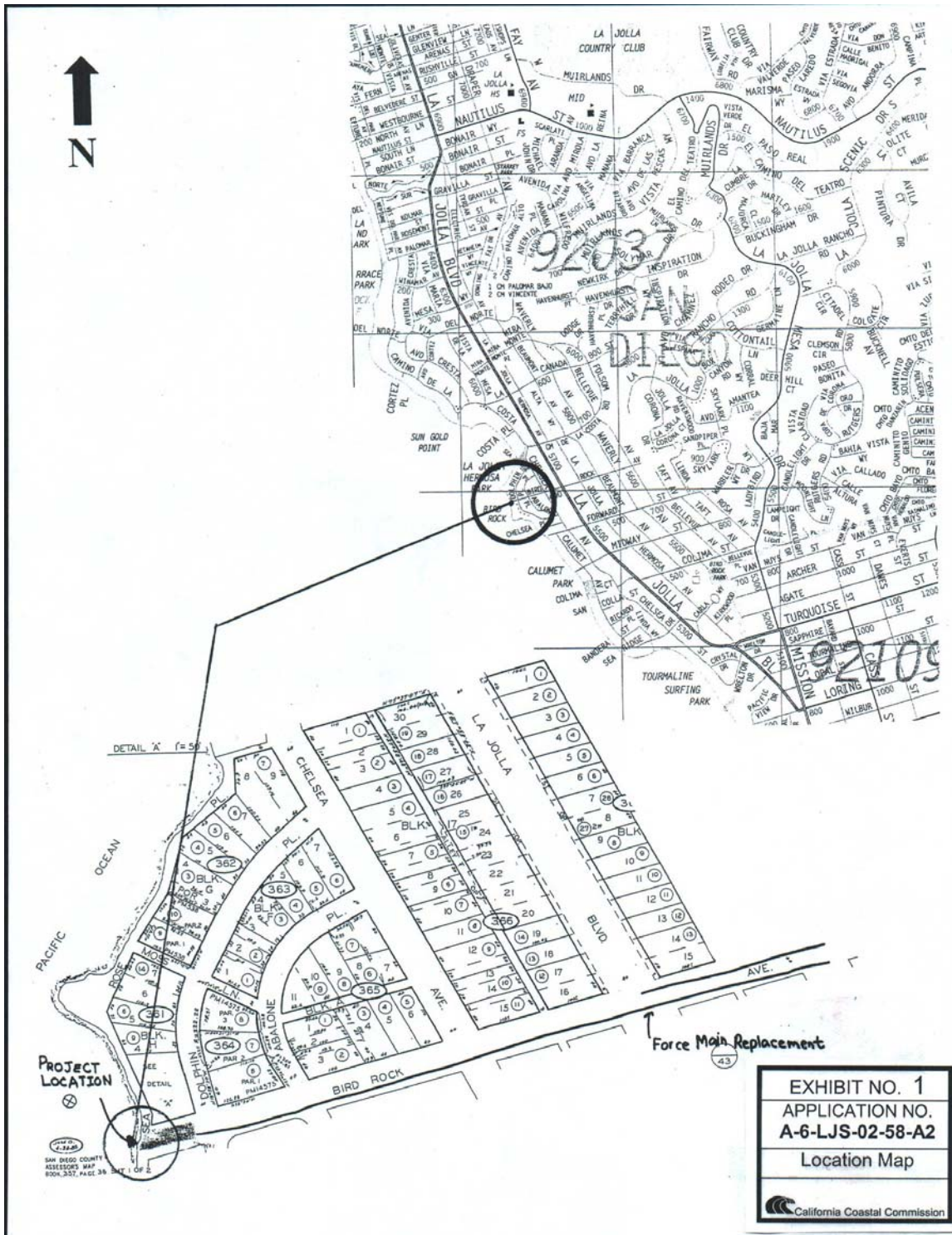
In reviewing the City’s request, the Commission finds that rather than leave the facility unfinished throughout the summer, allowing work to extend into the summer season for a short period of time, would result in the least overall impact on the public. Therefore, Special Condition #2 allows work to occur during the summer beach season but that such work will not be permitted on weekends and/or holidays during this time period to reduce impacts to public access to the maximum extent possible. Although the City has estimated that only seven working days are expected to complete the work, this gives the City additional time for any unforeseen delays with construction bidding, inclement weather or unforeseen problems in the field. As conditioned to allow work to occur during the summer beach season but to restrict it such that no work is permitted on weekends or holidays during that time frame, the proposed project is found consistent with the certified LCP and the public access and recreation policies of the Coastal Act.

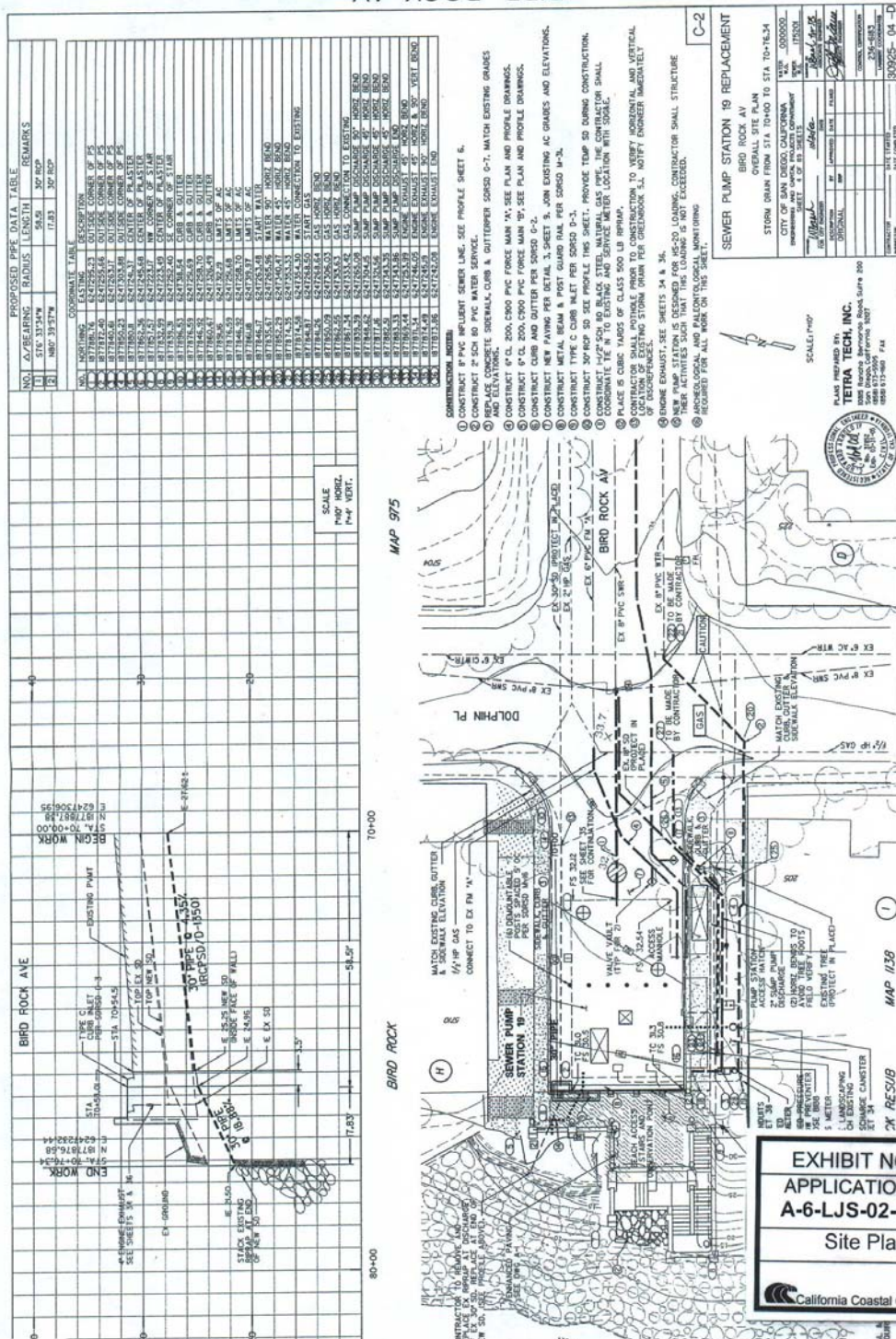
5. Local Coastal Planning. As conditioned, the subject proposal complies with the existing LCP provisions cited above pertaining to protection of visual resources. The Commission finds that, as conditioned to require submittal of a landscape plan that includes landscaping consisting of vine wells or planter boxes that are native, salt-tolerant (non- invasive or noxious plant materials) and that will thrive without irrigation when placed on the bluff or bluff face, and that construction be permitted during the summer months but restricted such that no work occurs on weekends or holidays during that time period, the proposal is consistent with all applicable LCP provisions as well as the public access and recreation policies of Chapter 3 of the Coastal Act. Therefore, as conditioned, the Commission finds that approval of the proposed development will not prejudice the ability of the City of San Diego to continue to implement its certified LCP for the La Jolla area of the City of San Diego.

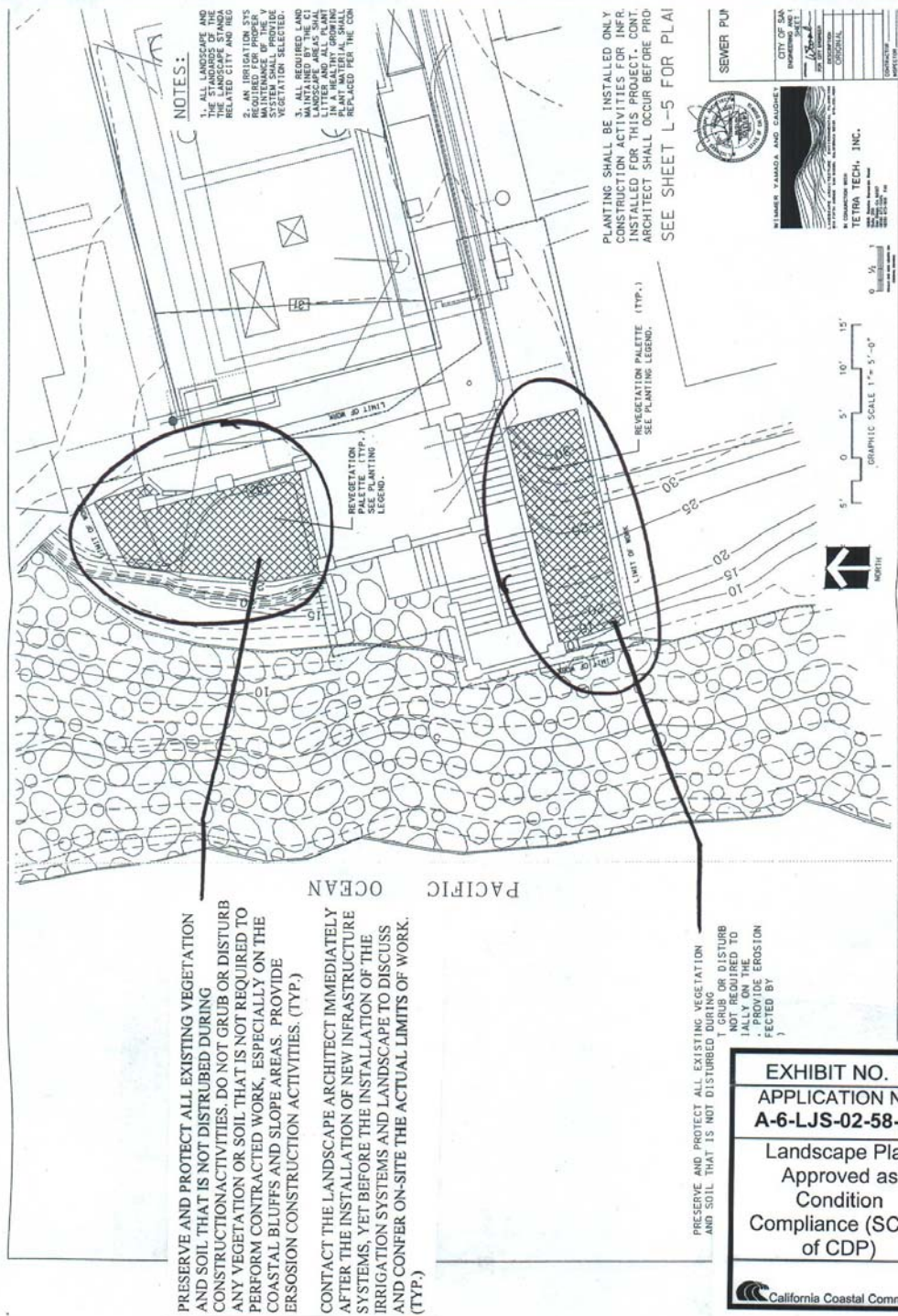
6. Consistency with the California Environmental Quality Act (CEQA).

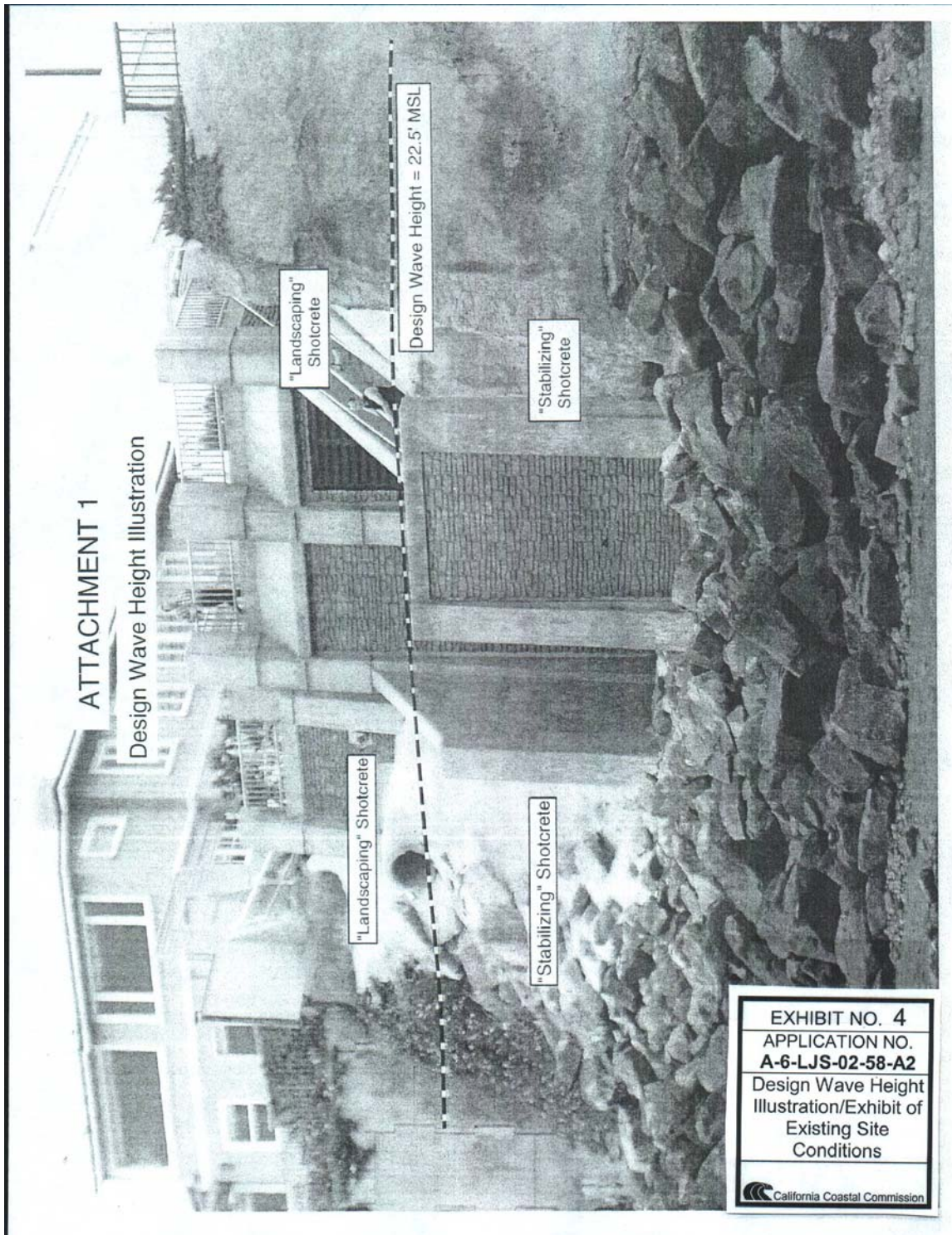
Section 13096 of the Commission's Code of Regulations requires Commission approval of Coastal Development Permits to be supported by a finding showing the permit, as conditioned, to be consistent with any applicable requirements of the California Environmental Quality Act (CEQA). Section 21080.5(d)(2)(A) 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 City of San Diego is the lead agency for this project with respect to CEQA. It issued a mitigated negative declaration for this project. The proposed project has been conditioned in order to be found consistent with the applicable provisions of the certified LCP as well as with the public access and recreation policies of Chapter 3 of the Coastal Act. Mitigation measures, including conditions addressing protection of visual resources and public access will minimize all adverse environmental impacts. As conditioned, 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 amended project is the least environmentally-damaging feasible alternative and inconsistent with the requirements of the Coastal Act to conform to CEQA.













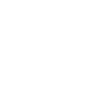
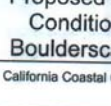
ATTACHMENT 3

Photo Simulation from Boulderscape

Before

ump Station #19 BOULDERSCAPE FINISH: Cemented Sandstone COLOR: Sandstone

Additional Colors



Additional Textures

A Professional Rockscape Corporation  
(949) 661-5087 www.boulderscape.com

EXHIBIT NO. 6

APPLICATION NO.

A-6-LJS-02-58-A2

Photo Simulation of

Proposed Site

Condition/

Boulderscape

California Coastal Commission