

CALIFORNIA COASTAL COMMISSION

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**W26b**

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STAFF REPORT: REGULAR CALENDAR

Application No.: 6-17-0707

Applicant: City of San Diego

Agent: Dan Daneri

Location: 1160 Coast Blvd, La Jolla, San Diego (San Diego County)

Project Description: Construction of two approximately 3-ft. high gates with related signage on two existing public beach access stairways to limit sea lion access into pedestrian areas.

Staff Recommendation: Approval with Conditions

SUMMARY OF STAFF RECOMMENDATION

The City of San Diego's proposed gates are in response to numerous incursions by resident California sea lions in La Jolla Cove into the public viewing deck and area around the lifeguard station overlooking the popular pocket beach. The City has indicated that sea lions periodically ascend the two public access stairways during the day and become aggressive due to the large number of visitors on the deck, and when they spend the night on the deck they defecate around the area, causing a health hazard for visitors and the lifeguards. The gates proposed by the City are approximately 3 feet in height and utilize a vertical bar design, which the City has indicated is the minimum size and bulk that will prevent the sea lions from ascending the stairs.

La Jolla Cove is one of the most popular coastal destinations in San Diego, especially during the busy summer season. The scenic location, views of La Jolla Shores and Torrey Pines, and

multitude of resident wildlife, including sea lions, that inhabit the adjacent bluffs and reefs draw thousands of people over the course of the year. The main avenue for entering the coastal waters and recreating on the shore is the pocket beach accessed by the two public stairways on which the City proposed to install the gates. The stairs, which were constructed prior to passage of the Coastal Act, have never had gates or barriers on them, and the presence of gates can have a detrimental impact on public access by making it appear as a particular area is closed or creating the potential for somebody to vandalize the gate and prevent it from opening. Commission staff worked with City staff to ensure that the low-profile, open gate design and new public access signage will have a minimal impact on public access, public recreation, and views. As conditioned, the lifeguards will secure the gates open during the day and close them at sunset when the lifeguards finish their shift. Signage on both the gates and the public viewing platform will inform the public that the beach is open at all times of the day so as to prevent the public from mistakenly believing the gates are intended to preclude beach access.

Special Condition No. 1 requires that the City to adhere to final construction plans, and **Special Condition No. 2** requires the City to implement a signage plan. **Special Condition No. 3** dictates that during the daytime hours the two gates shall be secured in a fully opened position, only allowed to be closed (but remain unlocked), during the nighttime hours. **Special Condition No. 4** requires that the City monitor both the effectiveness of the gates in deterring sea lion incursions into the public viewing deck, and any identified impacts to public access. **Special Condition No. 5** establishes a 5-year permit term for these gates to allow the Commission to reassess effectiveness and need of the gates in the popular beach destination. It is staff's understanding that the City is in agreement with the Special Conditions.

Commission staff recommends **approval** of coastal development permit application 6-17-0707 as conditioned. It is staff's understanding that the City is in agreement with the recommendation and special conditions.

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I. MOTION AND RESOLUTION

Motion:

*I move that the Commission **approve** Coastal Development Permit Application No. 6-17-0707 subject to the conditions set forth in the staff recommendation.*

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

Resolution:

The Commission hereby approves coastal development permit 6-17-0707 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

This permit is granted subject to the following 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 of 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.

III. SPECIAL CONDITIONS

This permit is granted subject to the following special conditions:

1. **Submittal of Final Plans.**

- (a) **PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT**, the applicant shall submit, for the review and written approval of the Executive Director, a full-size set of the following plans:

- (i) Final construction plans showing the dimensions and locations of all installed gates and indicate the hours required by Special Condition No. 3

- (b) The permittee shall undertake development in conformance with the approved final plans unless the Commission amends this permit or the Executive Director provides a written determination that no amendment is legally required for any proposed minor deviations.

2. **Submittal of Revised Signage Plan.**

- (a) **PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT**, the applicant shall submit, for the review and written approval of the Executive Director, a revised signage plan that incorporates the plan submitted on August 29, 2017 and includes, at a minimum, all of the following modifications:

- (i) Each gate shall have a sign measuring at least 12 inches wide and 18 inches tall on its landward side stating “Beach Open At All Times” in a large, easily readable font.

- (ii) Each entrance to the public viewing deck above the La Jolla Cove beach area shall have a sign measuring at least 12 inches wide and 18 inches tall stating “Beach Open At All Times” in a large, easily readable font.

- (iii) Existing informational and educational signage in the vicinity of the cove shall have language added informing the public that the gates are intended only for preventing sea lion access to the public deck.

- (b) The permittee shall undertake development in conformance with the approved final plans unless the Commission amends this permit or the Executive Director provides a written determination that no amendment is legally required for any proposed minor deviations.

3. **Gate Hours.**

From sunrise to sunset, the gates shall be securely fastened in a fully open position. From sunset to sunrise, the gates may be closed but shall remain unlocked.

4. **Submittal of Final Monitoring Plan.**

- (a) **PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT**, the applicant shall submit, for the review and written approval of the Executive Director, a final monitoring plan that includes the following:

- (i) Provision for submittal of a report to the Executive Director of the Coastal Commission by October 1st annually, after installation of the gates is complete and for the life of the permit. The annual report shall contain all of the following information:

- a. The date and time that sea lions are encountered in the area landward of the proposed gates;
- b. The number of sea lions encountered;
- c. A narrative description of the encounter (e.g. “found sleeping on public deck”);
- d. The manner in which City staff responded to the encounter, if at all, and the manner in which the sea lions departed the public viewing deck;
- e. If discernable, the manner in which the sea lion(s) accessed the area landward of the proposed gates and the manner in which they returned to the beach area;
- f. A record of any public complaints submitted regarding the gates or sea lions, and;
- g. Recommendations for necessary maintenance, repair, changes, or modifications to the project.

- (ii) If, based on the report required in subsection (a)(i) of this Special Condition to address public access impacts from the gates, the Executive Director determines that the gates are significantly

impacting public access or recreation, or that the gates are not significantly reducing the occurrence of sea lions landward of the gates, the Permittee shall apply for a coastal development permit or amendment within 3 months of the Executive Director's determination to evaluate and remedy any impacts.

- (b) The permittee shall undertake development in conformance with the approved final plans unless the Commission amends this permit or the Executive Director provides a written determination that no amendment is legally required for any proposed minor deviations.

5. **Permit Authorization Period.**

- (a) This Coastal Development Permit authorizes the approved development for a period of five years from the date of Commission action. After such time, the authorization for continuation or retention of any development approved as part of this permit shall cease, unless reauthorized by the Commission pursuant to a permit amendment, such as provided in (b) of this Special Condition.
- (b) If the permittee wishes to retain the project beyond the five-year term for which this permit provides authority and to maintain the gates in place, then no later than six months prior to the end of that five-year term, the permittee or successor in interest shall submit a complete coastal development permit amendment application for the reauthorization of the gates. The amendment application shall, at a minimum, include the results of the required monitoring reports in order to evaluate the effectiveness and impacts of the project; address changed circumstances and unanticipated impacts; consider modifications to the location and design of the gates; and consider measures necessary to minimize any adverse impacts to coastal resources or public access resulting from the continuation of the gates. Failure to either (1) obtain a permit amendment authorizing the permittee to retain the development for an additional term or (2) remove the project shall constitute a violation of the terms and conditions of this Coastal Development Permit. The Executive Director may grant the permittee additional time to file the application for good cause.

IV. FINDINGS AND DECLARATIONS

A. PROJECT DESCRIPTION

The City of San Diego proposes installation of two approximately 3-ft. high metal gates at the two existing public access stairs leading down to the sandy beach area at La Jolla Cove to prevent resident California sea lions from climbing the stairs to the public viewing deck and lifeguard station. La Jolla Cove is a north-facing pocket beach flanked by coastal bluffs and sea caves in the La Jolla community in San Diego. The public viewing deck is a concrete structure atop a coastal bluff that contains benches and a cantilevered lifeguard station with an equipment storage facility. Two concrete access stairs, one at each end of the deck, give the public direct access to the sandy beach below. The gate on the western access stairway would be located on a small landing at the mid-point of the stairs, and the gate on the eastern stairway would be located on a small landing near the bottom by the sand. The City is proposing to install new signage both on the gates and up on the public viewing platform informing the public that the beach is open at all times of the day so as to prevent the public from mistakenly believing the gates are intended to preclude beach access.

La Jolla Cove is located in the La Jolla community of San Diego. La Jolla is part of the City of San Diego's certified local coastal program, but because the project is located within the sandy beach area, the subject site is partially within the Commission's original permit jurisdiction and partially within the City's jurisdiction, appealable to the Commission. At the request of the City, this proposed project is being processed as a consolidated permit, as allowed by Section 30601.3 of the Coastal Act, which requires that Chapter 3 of the Coastal Act be the standard of review and the City's certified LCP be used as guidance.

B. PROJECT HISTORY

La Jolla Cove and its related park area were originally developed prior to passage of the Coastal Act. In 2014-2015, the City remodeled the existing public viewing platform and redeveloped the 80-sq. ft. steel-and-wood lifeguard tower cantilevered over the beach area pursuant to a local CDP. On April 24, 2017, the City informed the Commission that it had issued a local exemption for the erection of the two proposed gates at La Jolla Cove. Commission staff advised the City that the construction of new gates on a public access stairway is development that requires a permit and an appeal was filed by the Commission on May 8, 2017. Subsequently, the Commission's mapping department determined that the project area was split between the Commission's and the City's jurisdiction, and that a Commission CDP would also be required for the proposed gates. In response, the City withdrew their local exemption, mooting the Commission appeal, and submitted an application for a consolidated CDP.

C. PUBLIC ACCESS

Section 30604(c) of the Coastal Act states:

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)

Section 30210 of the Coastal Act states:

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 30211 of the Coastal Act states:

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) of the Coastal Act states, in part:

Public access from the nearest public roadway to the shoreline and along the coast shall be provided in new development projects except where: (1) it is inconsistent with public safety, military security needs, or the protection of fragile coastal resources, (2) adequate access exists nearby...

Section 30213 of the Coastal Act states, in part:

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

Section 30214(a) of the Coastal Act states, in part:

(a) The public access policies of this article shall be implemented in a manner that takes into account the need to regulate the time, place, and manner of public access depending on the facts and circumstances in each case including, but not limited to, the following:

(1) Topographic and geologic site characteristics.

(2) The capacity of the site to sustain sue and at what level of intensity.

(3) The appropriateness of limiting public access to the right to pass and repass depending on such factors as the fragility of the natural resources in the area and the proximity of the access area to adjacent residential uses.

Section 30220 of the Coastal Act states:

Coastal areas suited for water-oriented recreational activities that cannot readily be provided at inland water areas shall be protected for such uses.

Section 30221 of the Coastal Act states:

Oceanfront land suitable for recreational use shall be protected for recreational use and development unless present and foreseeable future demand for public or commercial recreational activities that could be accommodated on the property is already adequately provided for in the area.

Upon reliance of these policies of the Coastal Act, the certified La Jolla Community Plan and Local Coastal Program Land Use Plan contains policies to protect public access as well, including the following:

La Jolla's relationship to the sea should be maintained. Existing physical and visual access to the shoreline and ocean should be protected and improved...

The City should preserve and protect the coastal bluffs, beaches and shoreline area of La Jolla assuring 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...

The City should ensure that new development does not restrict or prevent lateral, vertical or visual access to the beach on property that lies between the shoreline and first public roadway...

New development should not prevent or unduly restrict access to beaches or other recreational areas...

The City's beach and parkland along the shoreline should be expanded wherever possible...

Construction, grading, or improvements of any sort, except those mentioned in this plan, should be discouraged at beach areas. Public access to the shoreline should be increased (or improved) wherever possible...

La Jolla is a coastal community within the City of San Diego that is a popular year-round coastal destination due to the numerous visitor commercial and natural amenities within the area. Among these amenities, the La Jolla Cove area of La Jolla is one of the more prominent; characterized by pocket beaches and sizeable coastal bluffs, it plays hosts to a wide range of wildlife and geological features, including the “seven caves of La Jolla” that are a popular kayaking destination. La Jolla Cove also lies within the San Diego La Jolla Underwater Park Ecological Reserve and thus is a popular destination for swimmers and snorkelers who wish to view marine habitat. Because of the numerous coastal bluffs and rich near-shore sea life, various species of shore birds and marine animals, including the California sea lion, make their home along this stretch of coast, with the shore birds nesting in the bluffs’ crevices and the sea lions feeding in the waters and resting on the bluff shelves.

The subject site is one of the few beaches in the area with ample visual access from the viewing deck above the beach, and stairways that provide water access, allowing beach goers the opportunity to view and swim in close proximity to the resident California sea lions that inhabit the adjacent bluffs and waters. It is this wildlife that draws many of the visitors to La Jolla Shores, as the City operates the area as a “shared beach,” meaning the public is able to access and recreate in the same waters, beaches, and bluffs that the above mentioned animals do, with the close proximity allowing the public to take photos of the animals or observe their natural behavior up close. Because of the area’s popularity, La Jolla Cove is one of nine beaches that have permanent lifeguard stations patrolled by San Diego lifeguards. This lifeguard station is situated above one of the few sandy beach areas along the coastal bluffs that allow for easy public access to the coastal waters for swimming and snorkeling (kayakers are limited to launching from La Jolla Shores to the north of La Jolla Cove).

The pocket beach at La Jolla Cove has been accessible by two concrete access stairways descending from a public viewing platform containing a lifeguard station since prior to the passage of the Coastal Act, and the stairways have never had gates. However, the City commissioned a May 1, 2017 Marine Coastal Management Plan that indicates that over the past 5-10 years there has been an increase in the resident California sea lion population (as well as an increase in stranding). The City lifeguards and park ranger have reported increasing incidents of sea lions ascending the concrete stairs up to the viewing platform. When occurring during the day time with large numbers of visitors, the City has stated that the incursions have led to occasional incidents of aggressive sea lion behavior between the sea lions and the public on the viewing deck. During the night, when the public vacates the deck, some sea lions have ascended the stairs to spend the night up on the deck, where they defecate on the deck and stairways, creating a public hazard, impacting the performance of the lifeguards and potentially deterring some people from descending the stairs down to the beach.

In response, the City is proposing the installation of two approximately 3-ft. high gates in the two public access stairways to prevent the sea lions from ascending them to the public viewing deck at night. Because the only intent of the gates is to prevent nighttime sea lion encroachment, and not impede pedestrian access, the gates would be no taller than the existing railings along the stairs, would be securely fastened in a fully open position

during the day and only latched (though not locked) at night, and utilize bars to allow the public to see through them but prevent sea lions from slipping through.

However, even when not intended to limit public access, gates can have both direct and indirect adverse impacts on public access. Although the City is not proposing to lock the gates at any time, locks *can* be added to gates (either officially or unofficially by members of the public), which would impede public access. Furthermore, the mere presence of gates can create the appearance of exclusivity and mistakenly cause members of the public to believe that a beach area is closed or has limited access.

Ideally, any required gates would be designed without a latching mechanism to ensure locks could not be added to the gates. Commission staff suggested use of a one-way spring gate swinging open towards the beach from the stairway that would have to be pulled open from the beach side and be able to close on its own without a latch to hold it. However, the City determined that such a design would not be adequate as the eastern gate, due to its low elevation down by the beach, would experience wave action during high tides and storm events, causing the gate to repeatedly open and close, potentially damaging it. Additionally, while only 3-ft. high, the City stated that swinging gates pose potential safety hazards to small children who may attempt to use them. Thus, the proposed gates will have a sliding latch mechanism on the top-right corner of the gate that can be opened by any person wishing to use the stairs (Exhibit 4).

The gates will only be 3 feet high, which will not block views, and the gates will not prevent human access even when closed. After discussion with Commission staff, the City proposed to have the lifeguards prop the gates open during the day and only close them at sunset when the lifeguards finish their shift. Additionally, the City has agreed to the placement of signage on the gates and public viewing deck to inform the public that the beach is open at all times. **Special Condition No. 1** requires the City to adhere to the approved design of a gate that is no higher than approximately 3-ft. **Special Condition No. 2** requires the City to provide a revised signage plan that places signs on the gates and viewing platform of a size and type clearly informing the public that the beach area is open at all times. **Special Condition No. 3** requires that the gate be securely fastened open during the daytime hours and only closed – but remain unlocked – during nighttime hours.

The City has designed the gates to be the least impactful and most effective manner in which to deter the sea lions from ascending to the public viewing platform. However, due to the number of sea lions and unpredictable manner in which nature may react to artificial structures, there is the chance that the sea lions may still gain access to the public viewing platform. Thus, if it turns out that the gates are not effective in their intended goal, then there would be little reason for the retention of the gates and their potential adverse impacts to public access, minimized though they may be. **Special Condition No. 4** requires the City to implement an annual monitoring program during the duration of the permit to record the time and nature of all incidents involving sea lions up on the public viewing platform, so as to track any patterns or change in volume of incidents. The monitoring program must also report any adverse impacts to public access identified through the monitoring; for example, complaints about the gates, vandalism

that impacts public access, etc. **Special Condition No. 5** places a 5-year duration on the permit term to allow the Commission and the City to reassess the effectiveness of the gates and their impacts on public access at a point in the future before determining whether further operation of the gates is permissible.

Thus, with the above special conditions addressing design, operation, and monitoring of the gates, the proposed development can be found in conformance with the public access policies of Chapter 3 of the Coastal Act.

D. HABITAT

Section 30230 of the Coastal Act states:

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

In addition, the certified La Jolla Community Plan and Local Coastal Program Land Use Plan contain policies regarding the protection of marine resources which include the following:

The City should limit public access in open space areas that contain sensitive resources to scientific or educational use. Access should be confined to designated trails or paths and no access should be approved which would result in the disruption of habitat areas.

The City shall ensure the preservation of portions of public and private property that are partially or wholly designated as open space to the maximum extent feasible. Development potential on open space lands shown on Figure 7 shall be limited to preserve the Park, recreation, scenic, habitat and/or open space values of these lands, and to protect public health and safety...

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...

The La Jolla Cove area is inhabited by hundreds of sea lions, which swim and feed in the water and sunbathe on the adjacent coastal bluff areas. Within the past 5-10 years, 100-300 sea lions have started hauling out on the sandy beach area and adjacent coastal bluffs. Because the area is not used by the sea lions as a rookery (as the Pacific harbor seals utilize nearby Children's Pool), but instead is used for rest or sleeping, the City operates La Jolla Cove as a shared beach concept, where both the sea lions and the visiting public

traverse and recreate in the same beach and bluff areas. The City has reported that over the years it has not been uncommon for the sea lions to ascend the stairs to the public viewing deck to sleep or sunbathe, which has caused the human-animal conflict as described in Section C above. However, the proposed gates will not adversely affect the habitat and behavior of the sea lions, because they will only preclude the sea lions from accessing the artificial public viewing deck and sidewalk beyond. The sea lions will have the same access to the sandy beach area and coastal bluffs that they have occupied for years. Thus, the proposed gates are not expected to create any adverse habitat impacts and can be found in conformance with the habitat policies of Chapter 3 of the Coastal Act.

E. 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 proposed project is located within the City of San Diego, which has a certified Local Coastal Program; however, based on a jurisdictional boundary determination conducted by the Commission's Mapping Department, the sandy beach area Children's Pool Beach is located in an area where the Coastal Commission has retained permit jurisdiction as tidelands, and the City's jurisdiction begins midway up the public access stairs (Exhibit 3). Consequently, the proposed project spans both jurisdictions. Section 30601.3 of the Coastal Act provides that when a project requires a coastal development permit (CDP) from both a local government with a certified LCP and the Coastal Commission, a single, consolidated CDP for the entire project may be processed. At the request of the City, the subject permit has been processed as a consolidated CDP. Thus, the standard of review for the proposed project is the Chapter 3 policies of the Coastal Act. In addition, the policies of the certified City of San Diego Land Use Plan (specifically the La Jolla Community Plan and Local Coastal Program Land Use Plan) serve as guidance. As described above, as conditioned, the proposed project is consistent with the certified LCP and all applicable Chapter 3 policies of the Coastal Act and will not prejudice the ability of the City of San Diego to continue to implement its LCP for the La Jolla area.

F. CALIFORNIA ENVIRONMENTAL QUALITY ACT

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 found the proposed development to be exempt from CEQA pursuant to Section 21080(b)(1) for ministerial projects.

The proposed project has been conditioned in order to be found consistent with the Chapter 3 policies of the Coastal Act. Mitigation measures, including conditions addressing final gate design, location, and signage will minimize all adverse environmental and public access impacts. The City and Commission staff considered alternative designs for the gates. As conditioned, there are no feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse impact that the activity may have on the environment. Therefore, the Commission finds that the proposed project is the least environmentally-damaging feasible alternative and can be found consistent with the requirements of the Coastal Act to conform to CEQA.

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APPENDIX A – SUBSTANTIVE FILE DOCUMENTS

- Marine Coastal Management Plan – La Jolla; prepared by Hanan & Associates, Inc. dated May 1, 2017