CALIFORNIA COASTAL COMMISSION SAN DIEGO DISTRICT OFFICE

SAN DIEGO DISTRICT OFFICE 7575 METROPOLITAN DRIVE, SUITE 103 SAN DIEGO, CA 92108-4402 VOICE (619) 767-2370 FAX (619) 767-2384



W18a

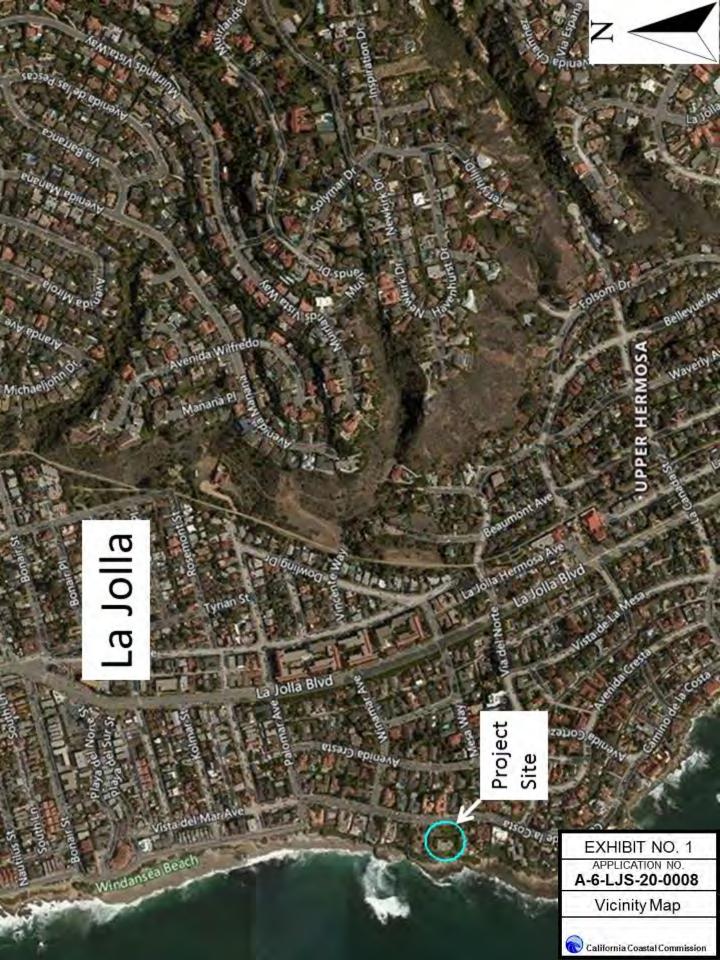
A-6-LJS-20-0008 (Abbott)

August 2022

EXHIBITS

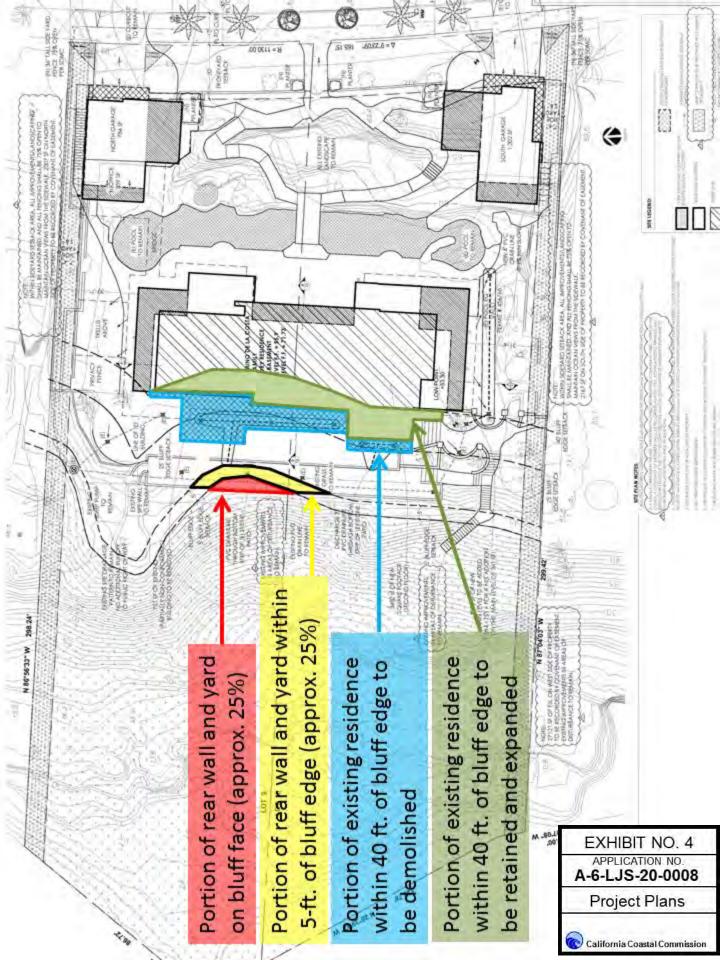
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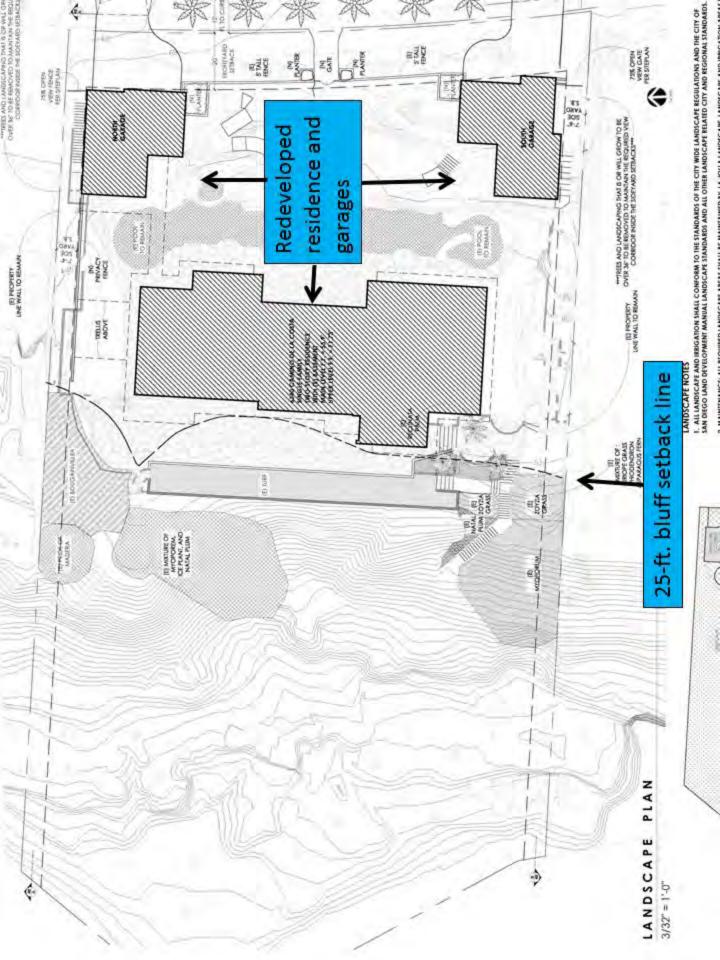
EXHIBIT 1: Vicinity Map EXHIBIT 2: Aerial View EXHIBIT 3: Site Photo EXHIBIT 4: Project Plans EXHIBIT 5: Existing Drainage Plan EXHIBIT 6: Proposed Drainage Plan EXHIBIT 7: Commission Staff October 19, 2018 Comment Letter

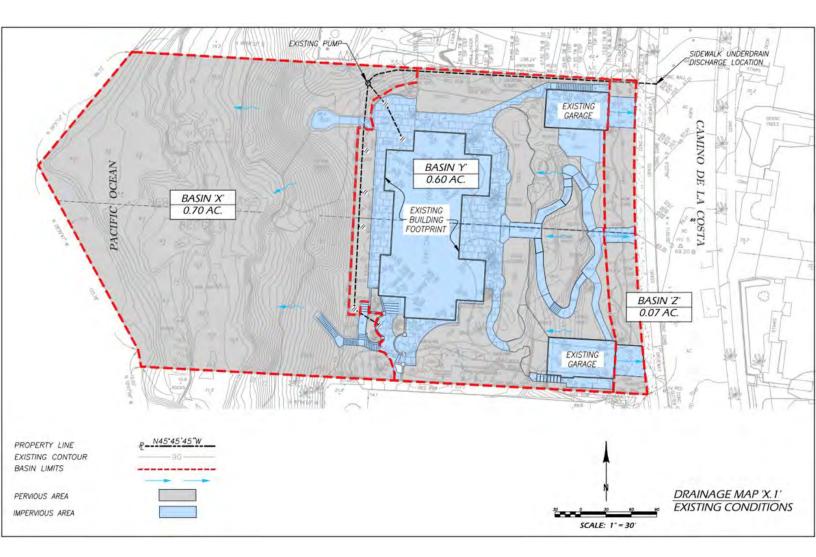




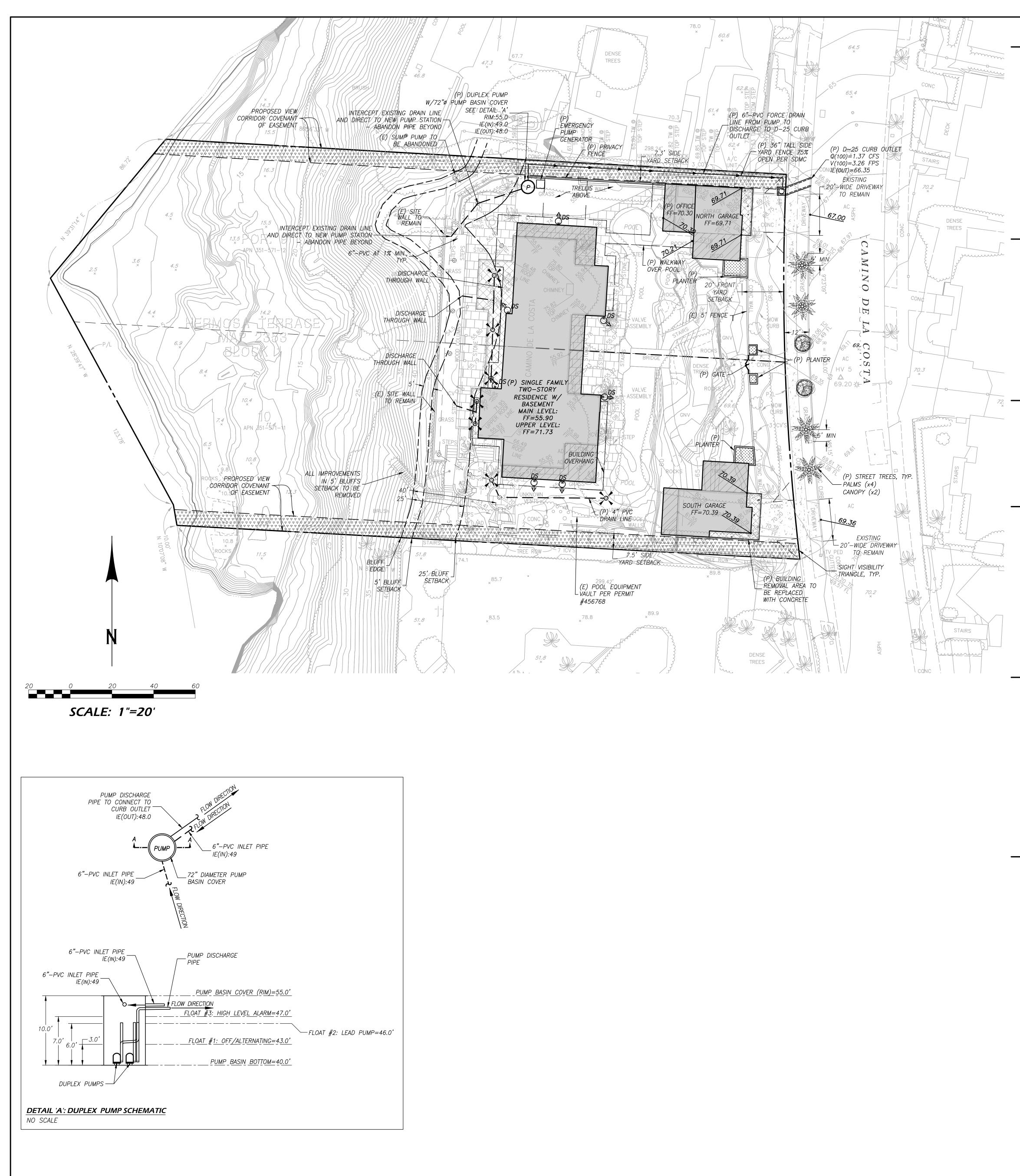












DRAINAGE NOTES

- 1. ALL MAIN DRAIN LINES SHOWN TO BE 6" PVC @ 1% MINIMUM SLOPE UNLESS OTHERWISE NOTED.
- 2. HARDSCAPE GRADES TO BE 1% MINIMUM TO DRAINS AND AWAY FROM STRUCTURE.
- 3. SOFTSCAPE GRADES TO BE 2% MINIMUM TO DRAINS (1% WHERE FLOW IS CONCENTRATED) AND 2% MINIMUM AWAY FROM STRUCTURE.
- 4. SOIL COVER ABOVE DRAIN LINES SHALL BE 12" UNLESS OTHERWISE NOTED.
- 5. NOTIFY CIVIL ENGINEER IF ANY NON-DRAINING SUMP CONDITIONS BECOME APPARENT DURING CONSTRUCTION.
- 6. ALL PRIVATE STORM WATER RUNOFF WILL BE ROUTED TO LANDSCAPE OR PLANTER BOXES PRIOR TO REACHING THE PUBLIC DRAINAGE SYSTEM.

STORM WATER NOTES

- 1. THIS PROJECT WILL NOT DISCHARGE ANY INCREASE IN STORM WATER RUN-OFF ONTO THE EXISTING HILLSIDE AREAS.
- 2. AT THE STORM WATER DISCHARGE LOCATIONS , SUITABLE ENERGY DISSIPATERS ARE TO BE INSTALLED TO REDUCE THE DISCHARGE TO NON-ERODABLE VELOCITIES.

CONSTRUCTION PERMIT NOTES

- 1. PRIOR TO THE ISSUANCE OF ANY CONSTRUCTION PERMIT, THE OWNER/PERMITTEE SHALL INCORPORATE ANY CONSTRUCTION BEST MANAGEMENT PRACTICES NECESSARY TO COMPLY WITH CHAPTER 14, ARTICLE 2, DIVISION 1 (GRADING REGULATIONS) OF THE SAN DIEGO MUNICIPAL CODE, INTO THE CONSTRUCTION PLANS OR SPECIFICATIONS.
- 2. PRIOR TO THE ISSUANCE OF ANY CONSTRUCTION PERMIT THE OWNER/PERMITTEE SHALL SUBMIT A WATER POLLUTION CONTROL PLAN (WPCP). THE WPCP SHALL BE PREPARED IN ACCORDANCE WITH THE GUIDELINES IN PART 2 CONSTRUCTION BMP STANDARDS CHAPTER 4 OF THE CITY'S STORM WATER STANDARDS.
- 3. THE SINGLE-FAMILY RESIDENTIAL DEVELOPMENT PROJECT WILL HAVE A COMBINED DOMESTIC / FIRE PROTECTION WATER SERVICE WHICH UTILIZES A PASSIVE PURGE SYLE OF DESIGN. IT IS THEREFORE EXEMPT FROM THE REQUIREMENT FOR A BACKFLOW PREVENTION DEVICE.

SOURCE CONTROL BMPs

4.2.1	PREVENTION OF ILLICIT DISCHARGES INTO THE MS4
SC-P	PLAZAS, SIDEWALKS, AND PARKING LOTS
SC-0	<u>MISCELLANEOUS DRAIN OR</u> <u>WASH WATER:</u> FOR ROOFING, GUTTERS, AND TRIM
SC-D2	LANDSCAPE / OUTDOOR PESTICIDE USE

THE SOURCE CONTROL BMP(s) LISTED ABOVE SHALL BE IMPLEMENTED PER THE CRITERIA OUTLINED IN APPENDIX E: BMP DESIGN FACT SHEETS AS DESCRIBED IN THE CITY OF SAN DIEGO STORM WATER STANDARDS BMP DESIGN MANUAL (JANUARY 2018) AND IN ACCORDANCE WITH THE SELECTED SOURCE CONTROL BMPs LISTED IN FORM I-4A FOR A STANDARD DEVELOPMENT PROJECT.

SITE DESIGN BMPs

4.3.1	IMPERVIOUS AREA DISPERSION
4.3.3	MINIMIZE IMPERVIOUS AREA
4.3.4	MINIMIZE SOIL COMPACTION
4.3.5	IMPERVIOUS AREA DISPERSION
4.3.7	LANDSCAPING WITH NATIVE/DROUGHT TOLERANT SPECIES

THE SOURCE CONTROL BMP(s) LISTED ABOVE SHALL BE IMPLEMENTED PER THE CRITERIA OUTLINED IN APPENDIX E: BMP DESIGN FACT SHEETS AS DESCRIBED IN THE CITY OF SAN DIEGO STORM WATER STANDARDS BMP DESIGN MANUAL (JANUARY 2018) AND IN ACCORDANCE WITH THE SELECTED SOURCE CONTROL BMPs LISTED IN FORM I-5A FOR A STANDARD DEVELOPMENT PROJECT.

CIVIL ENGINEER:

MICHAEL C. KINNEAR, PE COFFEY ENGINEERING, INC. 9666 BUSINESSPARK AVENUE., SUITE 210 SAN DIEGO, CA 92131 (858)831–0111 FAX: (858)831–0179



DATE

EXISTING CONTOUR
PROPOSED CONTOUR
ETBACK LINE
P) SPOT ELEVATION
E) SPOT ELEVATION
E) SEWER MAIN
E) WATER MAIN
E) GAS LINE
E) BUILDING FOOTPRINT
P) BUILDING FOOTPRINT
P) BUILDING/ROOF OVERHANG
E) 4"–PVC DRAIN LINE
P) 4"–PVC DRAIN LINE
P) RETAINING WALL
E) SUMP PUMP

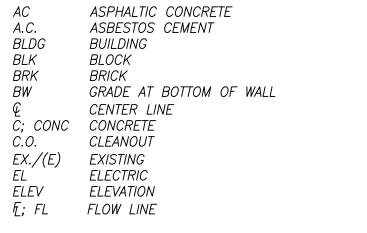
(P) 6" DRAIN

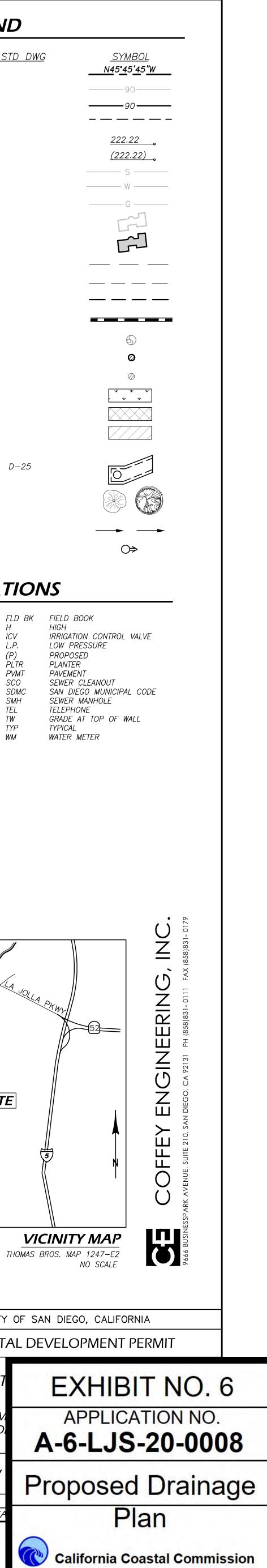
- (E) 6" DRAIN
- (P) LANDSCAPE
- (P) EXISTING BUILDING TO BE REMOVED

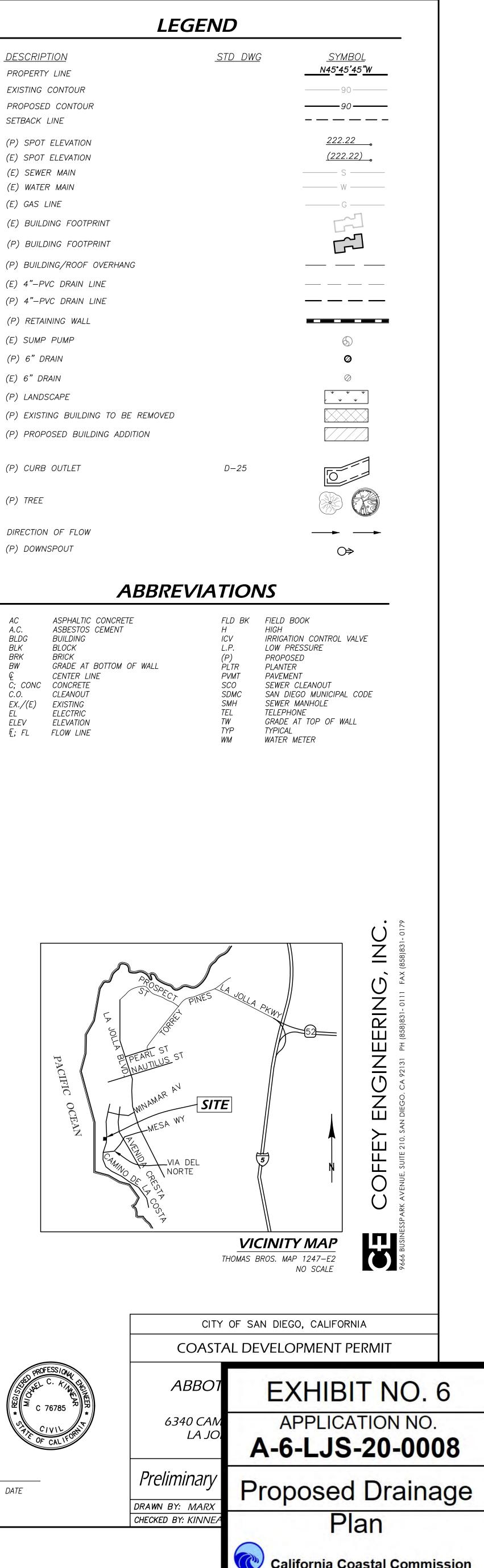
(P) CURB OUTLET

(P) TREE

DIRECTION OF FLOW (P) DOWNSPOUT







MICHAEL C. KINNEAR RCE 76785 EXP. 12/30/22

CALIFORNIA COASTAL COMMISSION

SAN DIEGO AREA 7575 METROPOLITAN DRIVE, SUITE 103 SAN DIEGO, CA 92108-4421 (619) 767-2370



October 19, 2018

Glenn Gargas Development Services Dept. 1222 First Ave, MS 501 San Diego, CA 92101

Re: Offline Review Comments re: Abbot Residence (Project No. 538814)

Dear Mr. Gargas:

Thank you for the opportunity to comment on the pending City of San Diego coastal development permit for the partial demolition and second-story addition to an existing 5,609 sq. ft. single family residence located on a 1.37-acre bluff top lot at 6340 Camino de la Costa, La Jolla, San Diego, CA, 92037. The site is located between the first public road and the sea, in the appeals jurisdiction of the California Coastal Commission.

The subject property contains a single family residence as well as two smaller, detached garage structures, a swimming pool, and landscaping and hardscape. The single family residence, constructed in 1962, predates the Coastal Act and is a legally non-conforming structure in that portions of the residence are located closer than the default forty feet setback to the coastal bluff edge required in the certified Local Coastal Program (LCP). In addition, the rear yard area terminates at an approximately 110-foot wall along its western boundary that is partially located seaward of the coastal bluff edge on the bluff face. The proposed development includes the demolition of all portions of the existing single family residence located closer than twenty-five feet to the bluff edge. All the new additions are likewise proposed to only be twenty-five, not forty, feet back from the bluff edge. However, the aforementioned rear yard wall is proposed to be retained in its current non-conforming configuration. The certified LCP permits twenty-five foot setbacks from the bluff edge for qualifying development, but if shoreline protection is present on the property, the default forty-foot setback must be applied.

Upon review of the materials, Commission staff expressed concern over the presence of the rear wall on the bluff face in comments dated August 14, 2017, October 26, 2017, May 22, 2018, and July 31, 2018. Section 143.0143(f) of the certified LCP addresses development regulations for sensitive coastal bluffs. Per the LCP, the presence of an existing shoreline protective device on a site automatically imposes a forty-foot bluff setback for any new development. Thus, the subject project would have been modified to require all new development to be sited no closer than forty feet from the bluff edge, or the segment of wall seaward of the bluff edge be removed to be consistent with the LCP.

The applicant expressed disagreement with the characterization of the rear wall a shoreline protective device, and submitted additional information detailing the construction history of the rear wall, the minimal wave action that the majority of



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bluff face experiences, the historically low erosion rate of the dense bluff material, and evidence that the wall is not supporting the existing residence. Commission staff acknowledges that the wall is a legal non-conforming use, and that the site has experienced relatively little erosion in the decades since the wall was constructed. However, the fact that the wall is not required to support the residence, or that the wall does not receive wave action, does not mean it is not a shoreline protective device. The Commission's geologist has reviewed the project and the material submitted, and notes that the presence of the wall has to some extent protected the bluff by slowing or limiting the rate or extent of erosion that would otherwise have occurred on the natural bluff face, affecting both the profile of the bluff and the amount of sand that reaches the beach. Thus, staff believes that the retaining wall is, in part, a shoreline protective device under the LCP.

Nevertheless, Commission staff recognizes that the majority of the 110-ft. wall (approximately three-quarters) is not located seaward of the bluff. The applicant has provided evidence that the existing residence does not depend on the wall for support. The site has historically experiences limited erosion and wave action (although this may not be the case in the future given sea level rise and climate change). The project does not constitute demolition of the existing structure, and includes removal of portions of the structure that are most at risk from erosion. Given these particular circumstances and the limited nature of the development, this particular project is less likely to result in substantial adverse impacts to coastal resources.

Commission staff believes it is important that the City's approval of the permit not conclude that the existing rear wall is not shoreline protection. Rather, the findings supporting any permit authorizing the residential addition should identify the distinguishing characteristics of the site and the development as noted. Findings or conditions should make clear that absolutely no work to the rear wall is included in the proposed residential remodel, and that barring routine repair and maintenance, no alteration, modification, or expansion of the rear wall is authorized by the permit and will require its own separate permit review. Further, the current configuration of the wall should be described, namely with regard to its relatively minor interaction with the coastal bluff. This includes noting that the vast majority of the wall is located landward of the designated bluff edge, and that the wall itself does not contain any deep footings or caissons either on or behind the bluff. Furthermore, the findings should note that the rear wall is not retaining any of the bluff material, but rather only supports the fill constituting the rear yard area. Finally, it is especially important to note that the existing residence, either in its current or proposed state, is not currently nor is expected in the future to rely on the rear wall for geological support.

Regarding special conditions in any final local permit, the LCP requires that any development proposing a geological setback of less than forty feet record a waiver of future shoreline protection, and such a condition will be expected in any final permit action. As an ancillary structure to the primary residence, the LCP makes clear that structures such as the rear wall do not qualify for any future protection from erosion or other geological hazards, and consequently the findings should make clear that should the

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wall become undermined at some point in the future, in line with the LCPs coastal resource protection policies, it is expected that the wall will be removed, in whole or in part, at that time.

Commission staff appreciates the City's willingness to coordinate with the Commission on this project to ensure that all potential impacts to coastal resources are addressed and mitigated as necessary.

Should you have any questions or comments regarding the above matter, please feel free to contact me at the San Diego District office at (619) 767-2370.

Sincerely,

Alexander Llerandi Coastal Program Analyst California Coastal Commission San Diego District