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STAFF REPORT: APPEAL – NO SUBSTANTIAL ISSUE

Appeal No.: A-5-LOB-23-0046

Applicant: CP VI Marketplace, LLC

Local Government: City of Long Beach

Local Decision: Approval with Conditions

Appellants: Sierra Club Los Cerritos Wetlands Task Force

Project Location: 6615, 6621, and 6695 East Pacific Coast Highway, Long Beach, Los Angeles County
 (APNs: 7237-020-040, 7237-020-041, and 7237-020-050)

Project Description: Demolition of two existing office buildings (6615 and 6695 East Pacific Coast Highway), construction of a new six-story mixed-use project consisting of 390 residential dwelling units (17 of which are affordable), 5,351 sq. ft. of commercial/retail space in a building with 576 vehicular parking spaces in an above grade parking structure, 196 bicycle parking spaces, and 45,141 sq. ft. of public and private open space area, a lot line adjustment to reposition the property line between two parcels (APNs: 7237-020-050 and 7237-020-041), and merger of two lots (APNs: 7237-020-050 and 7237-020-040) into a single 163,249 sq. ft. lot.

Staff Recommendation: No Substantial Issue

IMPORTANT HEARING PROCEDURE NOTE: This is a substantial issue only hearing. Testimony will be taken only on the question of whether the appeal raises a substantial issue. Generally, and at the discretion of the Chair, testimony is limited to 3 minutes total per side. Please plan your testimony accordingly. Only the applicant, persons who opposed the application before the local government, and the local government shall be

qualified to testify. Others may submit comments in writing. If the Commission determines that the appeal does raise a substantial issue, the de novo phase of the hearing will occur at a future Commission meeting, during which it will take public testimony.

STAFF NOTE

The City-approved mixed-use building and associated improvements are entirely within the City's non-appealable permit jurisdiction area, and only a portion of the 6621 PCH parcel (APN: 7237-020-041), which is subject to the proposed lot line adjustment, falls within the Commission's appealable jurisdiction ([Exhibit 1](#)). Therefore, the grounds for appeal for this item are limited to the City's action on the lot line adjustment only. In other words, the grounds for appeal are limited to an allegation that the proposed lot line adjustment does not conform to the standards set forth in the certified Local Coastal Program or the public access policies of the Coastal Act.

SUMMARY OF STAFF RECOMMENDATION

On July 20, 2023, the City of Long Beach Planning Commission approved a Local Coastal Development Permit (CDP) for the demolition of two existing office buildings at 6615 and 6695 East Pacific Coast Highway, construction of a new six-story, mixed-use project consisting of 390 residential dwelling units (17 of which are affordable), 5,351 sq. ft. of commercial/retail space in a building with 576 vehicular parking spaces in an above grade parking structure, 196 bicycle parking spaces, and 45,141 sq. ft. of public and private open space area, a lot line adjustment to reposition the property line between two parcels (APNs: 7237-020-050 and 7237-020-041), and a lot merger of two lots (APNs: 7237-020-050 and 7237-020-040) into a single 163,249 sq. ft. lot ([Exhibits 1 and 2](#)). The decision was appealed to the City Council, which denied the appeals. After receiving the City's Notice of Final Local Action for the CDP, the Commission opened its appeal period and thereafter received one timely appeal from Sierra Club Los Cerritos Wetlands Task Force.

The project site is an L-shaped site located at the northeast corner of the intersection of Pacific Coast Highway (PCH) and Studebaker Road in the southeast portion of the City. The project site is comprised of three parcels (6615, 6621, and 6695 East Pacific Coast Highway) developed with three, two-story buildings and surface parking ([Exhibit 1](#)). The "physical development site" consists of two parcels occupied by two office buildings addressed as 6615 and 6695 East Pacific Coast Highway. There would be no physical alteration of the developments at 6621 PCH, however, the lot line adjustment would modify the size of this parcel. The City's Southeast Area Specific Plan (SEASP)—which was certified as a component of the City's LCP on September 8, 2021—zones the subject property as Mixed Use Community Core (MU-CC) Zoning District, meaning, mixed-use projects are allowed if found to be consistent with the applicable certified LCP policies and the public access policies of the Coastal Act.

The appellant raises several issues with the City's analysis in its local approval of the project, most of which do not constitute valid grounds for appeal as they do not pertain to whether the proposed lot line adjustment is consistent with the City's certified LCP or

public access policies of the Coastal Act. For example, the appellant contends that the impacts of the mixed-use project itself should be taken into the Commission's consideration since the project area includes the parcel that is only affected by the lot line adjustment, which contains a portion within 100 feet of the Los Cerritos Wetlands. However, when a project area is bisected by appealable and non-appealable jurisdictions, only that portion of development within the appealable area is appealable to the Coastal Commission. In this case, only a portion of the 6621 PCH parcel (APN: 7237-020-041) subject to the proposed lot line adjustment is within 100 feet of an identified wetland and is, thus, appealable. The closest physical developments associated with the project are over 170 feet from the nearest potential wetland area. Therefore, the merits of the mixed-use development itself are not valid grounds for appeal.

The appellant also claims that the project as a whole (including the lot line adjustment) would impact the Los Cerritos Wetlands and the community. This claim was not supported by arguments about specific wetland or community impacts. In any case, the City found that the construction of the mixed-use building and associated improvements is consistent with the applicable development standards contained in the LCP for the MU-CC Zoning District, and that the closest building areas are over 170 feet from the nearest potential wetland areas. Therefore, there are no anticipated impacts to wetlands and the City did assess the project's impact on the community and the Los Cerritos Wetlands in its approval. In addition, the Commission's appellate jurisdiction after certification of an LCP is limited as set forth in Coastal Act section 30603. In this case, that appealable area is the southeast corner of the 6621 PCH parcel (APN: 7237-020-041) where the western property boundary is being adjusted east, approximately 60 ft ([Exhibit 1](#)). This adjustment changes the parcel size from 81,069 sq. ft. to 68,691 sq ft., which could still accommodate future development that adheres to all applicable SEASP policies including the wetland and ESHA buffers.

As none of the contentions raised in the appeal pose a substantial issue as to whether the proposed lot line adjustment is consistent with the policies of SEASP or public access policies of the Coastal Act, staff recommends that the Commission determine that **no substantial issue exists** with respect to the grounds on which appeal number A-5-LOB-23-0046 has been filed under section 30603 of the Coastal Act. The motion to adopt the staff recommendation is found on **page 5**.

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[EXHIBITS](#)

[Exhibit 1 – Vicinity Map and Project Site](#)

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[Exhibit 3 – Appeal](#)

I. MOTION AND RESOLUTION – NO SUBSTANTIAL ISSUE

Motion: I move that the Commission determine that Appeal No. A-5-LOB-23-0046 raises **NO SUBSTANTIAL ISSUE** with respect to the grounds on which the appeal has been filed under Section 30603 of the Coastal Act.

Staff recommends a **YES** vote. Passage of this motion will result in a finding of No Substantial Issue and adoption of the following resolution and findings. If the Commission finds No Substantial Issue, the Commission will not hear the application de novo and the local action will become final and effective. The motion passes only by an affirmative vote of the majority of the Commissioners present.

Resolution: The Commission hereby finds that Appeal No. **A-5-LOB-23-0046** does not present a substantial issue with respect to the grounds on which the appeal has been filed under Section 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.

II. APPELLANTS' CONTENTIONS

On July 20, 2023, the City of Long Beach Planning Commission approved a Local Coastal Development Permit (LCDP Application No. 22-049) for the demolition of two existing office buildings (6615 and 6695 East Pacific Coast Highway) on the site, construction of a new six-story, mixed-use project consisting of 390 residential dwelling units (17 of which are affordable), 5,351 sq. ft. of commercial/retail space in a building with 576 vehicular parking spaces in an above grade parking structure, 196 bicycle parking spaces, and 45,141 sq. ft. of public and private open space area, a lot line adjustment to reposition the property line between two parcels (APNs: 7237-020-050 and 7237-020-041), and a lot merger of two lots (APNs: 7237-020-050 and 7237-020-040) into a single 163,249 sq. ft. lot ([Exhibit 1 and 2](#)). The decision was appealed to the City Council by Supporters Alliance for Environmental Responsibility (SAFER), Los Cerritos Wetlands Land Trust, and Sierra Club Los Cerritos Wetlands Task Force. On September 19, 2023, the Long Beach City Council held a public hearing, denied the local appeals, and upheld the Planning Commission decision to conditionally approve the project.

On November 2, 2023, during the 10 working-day appeal period, the Commission received an appeal of the local CDP from the Sierra Club Los Cerritos Wetlands Task Force ([Exhibit 3](#)).

The appellant raises four issues with the City's analysis in its local approval of the project. Specifically, the appellant contends:

- 1) The sole purpose of dividing this property into two parcels is to deny the right of the public to appeal the project to the California Coastal Commission.
- 2) The Project Area for the proposed development as described in the EIR and as approved by the City of Long Beach, lies within 100 feet of the Los Cerritos Wetlands, therefore the Project itself is appealable to the Coastal Commission.

- 3) It is critical that the Coastal Commission not allow projects, or project areas to be excluded from public and Coastal Commission oversight, especially when there is clear evidence that it is the intention of a developer to do so.
- 4) We further request that the impacts of the proposed Project itself on the Los Cerritos Wetlands and on our community should be taken into consideration, and not excluded from a discussion on the lot line adjustment. Piecemealing property in order to avoid accountability is not that different from arbitrarily restricting what can be considered in the decision making process. This matter is not merely about a line, it is at the heart of coastal protection.

III. LOCAL GOVERNMENT ACTION

On July 20, 2023, the City of Long Beach Planning Commission held a public hearing and approved LCDP No. 22-049 for demolition of two existing office buildings, construction of a mixed-use development with 390 residential rental units, and a lot line adjustment and a lot merger to create a new parcel for the proposed development ([Exhibit 2](#)). This action was appealed locally to the City Council by three parties, as stated above. On September 19, 2023, the Long Beach City Council held a public hearing, denied the local appeals, and upheld the Planning Commission decision to conditionally approve the project.

On October 19, 2023, the Commission received the Notice of Final Local Action for local CDP application No. 22-049 and opened the Commission's 10 working day appeal period. On November 2, 2023, one appeal was filed before the end of the appeal period ([Exhibit 3](#)).

IV. APPEAL PROCEDURES

After certification of LCPs, the Coastal Act provides for limited appeals to the Coastal Commission of certain local government actions on coastal development permit applications. Development projects approved by cities or counties may be appealed if they are located within certain geographic appealable areas, such as those located between the sea and the first public road paralleling the sea or within 100 feet of any wetland, estuary, or stream, or within 300 feet of the top of the seaward face of a coastal bluff. Furthermore, developments approved by counties may be appealed if they are not the designated "principal permitted use" under the certified LCP. Finally, any local government action on a proposed development that would constitute a major public work or a major energy facility may be appealed, whether approved or denied by the city or county [Coastal Act section 30603(a)].

Section 30603 of the Coastal Act states in relevant part:

- (a) After certification of its Local Coastal Program, an action taken by a local government on a Coastal Development Permit application may be appealed to the Commission for only the following types of developments:
 - (1) Developments approved by the local government between the sea and

the first public road paralleling the sea or within 300 feet of the inland extent of any beach or of the mean high tide line of the sea where there is no beach, whichever is the greater distance.

- (2) Developments approved by the local government not included within paragraph (1) that are located on tidelands, submerged lands, public trust lands, within 100 feet of any wetland, estuary, stream, or within 300 feet of the top of the seaward face of any coastal bluff.

Section 30603(a)(2) of the Coastal Act establishes a portion of the project site (eastern corner of the 7237-020-041 parcel) as being in an appealable area because it is located 100 feet from wetlands based on contemporary National Wetlands Inventory data.

Grounds for Appeal

The grounds for appeal of an approved local CDP in the appealable area are stated in Section 30603(b)(1):

The grounds for an appeal pursuant to subdivision (a) shall be limited to an allegation that the development does not conform to the standards set forth in the certified Local Coastal Program or the public access policies set forth in this division.

Section 30625(b)(2) of the Coastal Act requires the Commission to conduct a de novo review of the appealed project unless the Commission determines that no substantial issue exists with respect to the grounds on which an appeal has been filed pursuant to Section 30603(a). If Commission staff recommends a finding that a substantial issue does exist, and there is no motion from the Commission to find no substantial issue, the substantial issue question will be considered presumed, and the Commission will conduct the de novo portion of the public hearing on the merits of the project. A de novo review of the application on the merits uses the certified LCP as the standard of review (Section 30604(b)). In addition, for projects located between the first public road and the sea, a specific finding must be made that any approved project is consistent with the public access and recreation policies of the Coastal Act. (Section 30604(c)). Sections 13110-13120 of Title 14 of the California Code of Regulations further explain the appeal hearing process.

Qualifications to Testify before the Commission

In this case, because staff is recommending that the appeal raises no substantial issue, the Commission will hear arguments and vote on the substantial issue question. Generally, and at the discretion of the Chair, qualified persons will have three minutes per side to address whether the appeal raises a substantial issue. As noted in Section 13117 of Title 14 of the California Code of Regulations, the only persons qualified to testify before the Commission at the substantial issue portion of the appeal process are the applicant, the appellant(s), persons who opposed the application before the local government, and the local government. Testimony from other interested parties that did not oppose the application before the local government must be submitted in writing.

Upon the close of the public hearing, the Commission will vote on the substantial issue matter. It takes a majority of Commissioners present to find that no substantial issue is

raised by the local approval of the subject project. If the Commission finds that the appeal raises a substantial issue, the de novo phase of the hearing will be continued to a subsequent meeting, during which the Commission will take public testimony.

V. FINDINGS AND DECLARATIONS – NO SUBSTANTIAL ISSUE

A. PROJECT DESCRIPTION AND BACKGROUND

The project site is an L-shaped site located at the northeast corner of the intersection of Pacific Coast Highway (PCH) and Studebaker Road in the southeast portion of the City ([Exhibit 1](#)). Pacific Coast Highway borders the southwestern boundary of the project site and Studebaker Road borders the southeast boundary of the project site. The project site and surrounding properties and roadways are within the Southeast Area Specific Plan (SEASP) area, which encompasses 1,472 acres of land in the southeast area of the City certified by the Commission in 2021. The Los Cerritos Wetlands are located east of the office building at 6621 East Pacific Coast Highway. The Pumpkin Patch site, portions of the Los Cerritos Wetlands, and the San Gabriel River are located southeast across the Studebaker Road public right-of-way.

The project site consists of three parcels developed with three, two-story buildings and surface parking at 6615, 6621, and 6695 East Pacific Coast Highway ([Exhibit 1](#)). The “physical development site” consists of two parcels occupied by two office buildings addressed as 6615 and 6695 East Pacific Coast Highway. There is no redevelopment proposed at the rear office building at 6621 East Pacific Coast Highway, therefore this parcel is not referred to as part of the “physical development site.” However, the lot line adjustment would affect this parcel, which includes an appealable area adjacent to the wetlands.

The City-approved project would replace two existing two-story office buildings (6615 East Pacific Coast Highway and 6695 East Pacific Coast Highway) and surface-level parking lot with a new six-story mixed use building and attached parking structure ([Exhibit 2](#)). The mixed-use development consists of 390 residential dwelling units (17 of which are affordable at the very low-income level), 5,351 square feet of commercial/retail space in a building with 576 vehicular parking spaces in an above-grade parking structure, 196 bicycle parking spaces, and 45,141 square feet of public and private open space area. The project also includes a lot line adjustment to reposition the property line between two parcels (APNs: 7237-020-050 and 7237-020-041), and a merger of two lots (APNs: 7237-020-050 and 7237-020-040) into a single 163,249 sq. ft. lot ([Exhibits 1 and 2](#)) to create a new parcel for the proposed development.

The project site is located within the Mixed-Use Community Core (MU-CC) area of SEASP. As noted within the SEASP Ordinance, the MU-CC is “envisioned as the primary activity center in the SEASP area and provides for a mix of uses including residential, regional retail, overnight visitor-serving accommodations, and office uses.” The SEASP also requires mixed-use projects for parcels over two acres in

area, as is the case here. As such, any development approved on the City-approved merged lot would need to be mixed-use.

The City-approved mixed-use building and associated physical improvements are entirely within the City's non-appealable jurisdiction area. Only a portion of the 6621 PCH parcel (APN: 7237-020-041), which is solely modified by the lot line adjustment, falls within the Commission's appealable jurisdiction ([Exhibit 1](#)). Therefore, the grounds of appeal for this item are limited to the City's action on the lot line adjustment only. The merits of the physical development and the lot merger are not grounds for appeal.

B. LOCAL COASTAL PROGRAM CERTIFICATION

Long Beach is a coastal city in southern Los Angeles County. In 1980, the Coastal Commission certified the City's Local Coastal Plan (LCP). The City's LCP is comprised of a Land Use Plan (LUP) and Implementation Plan (IP) made up of several stand-alone documents.

The project site is within the City's Southeast Area Specific Plan District. The SEASP is a component of the City's LCP that governs land use and development for 1,500-acres in southeast Long Beach. The SEASP was effectively certified by the Commission on September 8, 2021. Therefore, the Commission's standard of review for the appeal of the proposed development is whether the appeal raises a substantial issue regarding conformity with the policies and provisions of the City of Long Beach Local Coastal Program, including the Southeast Area Specific Plan policies, and the public access policies of Chapter 3 of the Coastal Act. As stated in the SEASP (Section 10.2.7), in the case of conflicts between SEASP policies and other policies of the certified LCP, for development within the SEASP, SEASP (as the more specific planning document) would be applied.

C. FACTORS TO BE CONSIDERED IN SUBSTANTIAL ISSUE ANALYSIS

Section 30625(b)(2) of the Coastal Act requires a de novo hearing of the appealed project unless the Commission determines that no substantial issue exists with respect to the grounds on which the appeal has been filed pursuant to Section 30603(a) of the Coastal Act. The term "substantial issue" is not defined in the Coastal Act or its implementing regulations. Section 13115(c) of the Commission regulations provides that the Commission may consider various factors, including but not limited to the following ones, when determining if a local action raises a significant issue:

1. The degree of factual and legal support for the local government's decision [that the development is consistent with the certified LCP];
2. The extent and scope of the development as approved or denied by the local government;
3. The significance of the coastal resources affected by the decision;
4. The precedential value of the local government's decision for future interpretations of its LCP; and
5. Whether the appeal raises local issues, or those of regional or statewide significance.

The Commission may, but need not, assign a particular weight to a factor.

Staff is recommending that the Commission find that **no substantial issue exists** with respect to the grounds on which the appeals have been filed pursuant to Section 30603(a) of the Coastal Act.

D. SUBSTANTIAL ISSUE ANALYSIS

As stated in Section IV of this report, the local CDP may be appealed to the Commission on the grounds that the proposed development does not conform to the standards set forth in the City’s certified LCP or the public access policies of the Coastal Act. Pursuant to Section 30625(b)(2) of the Coastal Act, the Commission must assess whether the appeals raise a substantial issue with respect to the grounds upon which the appeals were filed pursuant to Section 30603 of the Coastal Act. The appellant’s contentions are discussed in detail below.

Contention 1: “The sole purpose of dividing this property into two parcels is to deny the right of the public to appeal the project to the California Coastal Commission.” This contention is not a valid ground for appeal because it does not pertain to whether the proposed lot line adjustment is consistent with SEASP policies or public access policies of the Coastal Act. Regardless, the project site consists of three parcels, and the project does not propose any new division of property. The City-approved project involves a lot line adjustment to reposition the property line between two parcels (APNs: 7237-020-050 and 7237-020-041) and a lot merger of two parcels (APNs: 7237-020-050 and 7237-020-040) into a single 163,249 sq. ft. lot, simply to create a single, bigger parcel that can accommodate the proposed mixed-use development.

Contention 2: “The Project Area for the proposed development as described in the EIR and as approved by the City of Long Beach, lies within 100 feet of the Los Cerritos Wetlands, therefore the Project itself is appealable to the Coastal Commission.” This is factually incorrect. When a project area is bisected by appealable and non-appealable jurisdictions, only that portion of development within the appealable area is appealable to the Coastal Commission. In this case, only a portion of the 6621 PCH parcel (APN: 7237-020-041) subject to the proposed lot line adjustment is within 100 feet of the identified wetland and is, thus, appealable. The closest physical development associated with the project is over 170 feet from the nearest potential wetland area. Further, the lot line adjustment itself is outside of the appealable area but is appealable due to potential impacts from the change in size of the parcel that contains the area within 100 ft of the wetlands.

Contention 3: “It is critical that the Coastal Commission not allow projects, or project areas to be excluded from public and Coastal Commission oversight, especially when there is clear evidence that it is the intention of a developer to do so.” This contention does not pertain to whether the proposed development within the appealable jurisdiction is consistent with SEASP policies or public access policies of the Coastal Act. The City’s action on this project did not affect the boundaries of the appealable areas within its jurisdiction.

Contention 4: “We further request that the impacts of the proposed Project itself on the Los Cerritos Wetlands and on our community should be taken into consideration, and not excluded from a discussion on the lot line adjustment. Piecemealing property in order to avoid accountability is not that different from arbitrarily restricting what can be considered in the decision making process. This matter is not merely about a line, it is at the heart of coastal protection.” The appellant did not specify any substantive concerns regarding the project’s impact on the wetlands and the community. Regardless, the certified SEASP contains development standards for new development in the MU-CC zoning district,¹ as well as policies that protect ESHA and wetlands in conjunction with new development² including Policy 5.20 that provides wetland buffer requirements. The City found that the construction of the mixed-use building and associated improvements is consistent with the applicable development standards contained in the SEASP’s MU-CC Zoning District, and that the closest building areas are over 170 feet from the nearest potential wetland areas. Thus, the City did assess the project’s impact on the community and the Los Cerritos Wetlands in its approval. In addition, the Commission’s appellate jurisdiction after certification of an LCP is limited as set forth in Coastal Act section 30603. In this case, as discussed above, that appealable area is the southeast corner of the 6621 PCH parcel (APN: 7237-020-041), which the western property boundary is being adjusted east, approximately 60 ft. This adjustment changes the parcel size from 81,069 sq. ft. to 68,691 sq ft., which could still accommodate future development that adheres to all applicable SEASP policies including the wetland/ESHA buffers.

SUBSTANTIAL ISSUE FACTORS:

Under Section 13115(c) of the Commission’s regulations, the Commission may consider various factors, including but not limited to the five factors listed below, in making a determination whether an appeal raises a substantial issue pursuant to Section 30625(b)(2). The Commission has discretion to afford more or less weight to any one of the substantial issue factors.

1. The degree of factual and legal support for the local government’s decision that the development is consistent or inconsistent with the certified LCP and the Coastal Act’s public access policies.

Even though the City did not make specific findings that the proposed lot line adjustment would be consistent with policies of the certified LCP and the public access and recreation policies of the Coastal Act, the Commission finds the lot line adjustment would have no significant impact, individually or cumulatively, on coastal resources, as there is no physical development proposed within 100 feet of ESHA or wetlands. Therefore, this factor supports a no substantial issue finding.

2. The extent and scope of the development as approved or denied by the local government.

The City-approved lot line adjustment is located in a highly developed, urban context, and its extent and scope are consistent with that intended for the surrounding area.

¹ SEASP, Chapter 6, Section 6.2

² SEASP, Chapter 5, Section 5.5 SEASP Policies, Policies 5.13, 5.16, and 5.20.

Additionally, future development on this site must comply with the City's LCP's coastal resource protection policies and the public access and recreation policies of the Coastal Act. Therefore, this factor supports a finding of no substantial issue.

3. The significance of the coastal resources affected by the decision.

As previously described, even though a portion of the parcel impacted by the lot line adjustment is within 100 feet of the Los Cerritos Wetlands, the proposed physical development would occur entirely outside the appealable jurisdiction and at least 170 feet away from the nearest potential wetland area. The lot line adjustment would have no significant impact, individually or cumulatively, on coastal resources. Additionally, any future development of this parcel (68,691 sq. ft. after the lot line adjustment) must comply with the certified LCP including the wetland and ESHA protection policies in the SEASP. This factor supports a finding of no substantial issue.

4. The precedential value of the local government's decision for future interpretations of its LCP.

The City's decision would not prejudice future interpretations of its LCP because the lot line adjustment would not affect the jurisdictional boundaries or the applicability of relevant coastal resource protection policies. This factor supports a finding of no substantial issue.

5. Whether the appeal raises local issues, or those of regional or statewide significance.

The valid grounds for this appeal are limited to whether the proposed lot line adjustment is consistent with City's certified LCP and the public access policies of the Coastal Act, which is a local issue that does not raise issues of statewide significance. As such, this factor supports a finding of no substantial issue.

Conclusion

As described above, none of the contentions raised in the appeal pose a substantive issue as to whether the proposed lot line adjustment is consistent with the policies of SEASP or public access policies of the Coastal Act. The Commission finds that the appeal raises no substantial issue as to the project's conformity with the LCP and the public access and recreation policies of Chapter 3 of the Coastal Act.

Appendix A – Substantive File Documents

1. City's Staff Report, Site Plan Review Findings, and LCDP Findings associated with File # 23-056PL for the City of Long Beach Planning Commission meeting on 7/20/2023
2. City's Staff Report, Site Plan Review Findings, and LCDP Findings associated with File # 23-1076 for the Long Beach City Council meeting on 9/19/2023