



THE CITY OF SAN DIEGO
Development Services Department
1222 1st Avenue, San Diego, CA 92101

Project Address 6110 Camino De La Costa
San Diego, CA 92037

Project Type Discretionary Project

Instructions

The following issues require corrections to the documents submitted.

Other

Coastal Commission

Jose Bautista
jabautista@sandiego.gov

[Comment 00081 | Page]

1. The proposed bluff edge delineation on the plans does not appear to conform to the supposed topography of the site. What are they basing the bluff edge delineation on? Please send me a copy of the geological survey for further review.
2. Regardless of where the bluff edge is delineated, everything west of it is by definition "costal bluff." As such, per the Environmentally Sensitive Land regulations, private development is not allowed on coastal bluffs. The property is currently non-conforming in that it has a wall and private access path on the bluff face. As the property is redeveloping, it must be brought up to current code, including removal of all private development west of the bluff edge.
3. Relatedly, without knowing more about the wall on the bluff face and composition of the bluff, the rear wall could be considered to be shoreline protection or an erosion control device, which under the LCP requires that all structures adhere to a minimum 40-foot setback, with no reduction at all.
4. The proposed residence is sited less than 40-feet from the bluff edge, which requires a geological report explaining how the structure will be safe for its 75-year economic life without shoreline protection. As above, please provide a copy of the submitted geological survey materials.
5. The proposed home cantilevers portions of the structure and upper-story decks into the geological setback area. Whatever the geological setback ends up being, absolutely no part of the structure may encroach into it, cantilevered or not. All portions of the structure must be landward of the bluff setback line. Decks and other accessory structures within the setback area must be at grade per Section 143.0143.
6. Any reduction in the setback below 40 feet requires a condition waiving all future shoreline protection on the site.
7. The proposed development includes a very large basement necessitating excavation of a substantial portion of the blufftop site. Such a substantial excavation could have substantial adverse impacts on future stability at the site as the bluff erodes eastward. The plans mention that the existing home proposed to be demolished contains a basement, but there are no as-builts for the existing residence to allow comparison. Please obtain as-built plans of the current structure to better assess current basement conditions.
8. While the bluff edge delineation appears adequate, per the LCP, all development seaward of the delineated bluff edge (walls, stairs, etc.) must be removed and the area left open space or revegetated with native vegetation. (personal



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observation: give that they are pretty small in scale, there probably would not be much weight to a hypothetical argument that removal would substantially damage the bluff face).

9. Please confirm how much, if any, of the existing artificial fill on the site will be removed as part of the project, with special focus given to the fill within 40 feet of the bluff edge.

10. The assessment for the potential of erosion of the upper bluff over the next 75 years was not adequate with respect to anticipated sea level rise. Sea level rise is expected to accelerate erosion rates along the state's coast as compared to historic erosion rates. As the neighboring properties have shoreline protection and sea caves already present, please provide further explanation as to how the anticipated sea level rise described in the Coastal Commission's Sea Level Rise Policy Guidance (<https://www.coastal.ca.gov/climate/slr/>) will impact erosion rates on the property in the future, with distinction made between sturdier lower bluff and the more vulnerable upper bluff. The current study's claim of no change is not supported by the analysis provided.

11. Please provide a wave runup analysis that includes sea level rise scenarios of up to seven feet and an analysis of the potential for upper bluff erosion over the next 75 years to assess the adequacy of the proposed twenty-five-foot setback.

12. The proposed residence contains a substantial basement that would excavate the majority of the developable area of the blufftop. Due to shoreline erosion, the basement may become exposed and need to be removed which, due to its size, presents a substantial risk due to the resulting void in the blufftop. The application should analyze how future removal of the basement would impact geologic stability.

13. The proposed development contains cantilevered elements within the geological setback. Per Section 143.0143 of the Land Development Code, all structural components must be located landward of the bluff setback line, with no elements cantilevering into it. Likewise, all accessory structures within the bluff setback area must be at grade; they cannot be elevated or cantilevered.

[Comment 00082 | Page]

Your plan reviewer from California Coastal Commission is Alexander Llerandi - Coastal Program Analyst II, Alexander.Llerandi@coastal.ca.gov, (619) 767-2370.

Please copy your assigned Development Project Manager, Jose Bautista, in any email correspondence with California Coastal Commission.

[Comment 00083 | Page]

For the next review, please provide the following items:

- 1) Revised Building Construction Plans
- 2) Applicant Responses to Issues

Community Planning Group

Jesus Murillo
jmurillo@sandiego.gov
619-533-6125



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[Comment 00001 | Page]

The proposed project is located within the La Jolla Community Planning Area. The La Jolla Community Planning Group is the officially recognized community group for the area to provide recommendations to the City.

If you have not already done so, please contact Dianne Kane, Chairperson of the La Jolla Community Planning Group at (858) 459-9490 or by email at info@lajollacpa.org to schedule your project for a presentation before the group at their next available meeting. If you have already obtained a recommendation from the group, please submit a copy of the recommendation and/or minutes from the meeting which includes the vote count to Jose Bautista, Development Project Manager at JABautista@san Diego.gov.

Development Services Department (DSD) Information Bulletin #620, "Coordination of Project Management with Community Planning Committees" (available at <https://www.sandiego.gov/development-services>), provides additional information about the advisory role of the Community Planning Groups. Council Policy 600-24 provides guidance to the Community Planning Groups and is available at https://docs.sandiego.gov/councilpolicies/cpd_600-24.pdf

DSD-Engineering Review

Anwer Iabriheem
Alabriheem@san Diego.gov
619-533-7445

[Comment 00002 | Page]

The Engineering Review Section has reviewed the subject development and have the following comments that needs to be addressed. Upon the resubmittal, we will complete our review.

[Comment 00003 | Page]

The San Diego Water Board adopted Order No. R9-2013-0001, NPDES No. CAS0109266, National Pollutant Discharge Elimination System (NPDES) Permit and Waste Discharge Requirements for Discharges from the Municipal Separate Storm Sewer Systems (MS4s) Draining the Watersheds within the San Diego Region. This project will be required to adhere to the new Storm Water Development Regulations.

[Comment 00004 | Page]

Please note all public improvements and dedications must be up to current city standard prior the issuance of any building permit as required per SDMC 142.0610 (a).

[Comment 00005 | Page]

Please call out curb to PL on the site and grading plans. Please note the minimum required is 10ft.

[Comment 00006 | Page]

Refer to comment #3 please call out construction of sidewalk and curb/gutter per city standard along the property frontage on Camino De La Costa street

[Comment 00007 | Page]

Please note per SDMC 142.0560 (j)(8) the subject property does not qualify for two driveways since the property frontage is 86.68 ft.

[Comment 00008 | Page]

Please revise the Site and Grading Plans to show proposed driveway per City Standard SDG-159 which includes 3ft wings and 3ft separation from any obstruction/property line.



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[Comment 00009 | Page]

Please clearly show all the existing and proposed improvements within Camino De La Costa public right of way (ROW) and note all private improvements within ROW requires Encroachments Maintenance and Removal Agreement (EMRA) which is subject to City Engineer approval

[Comment 00010 | Page]

Please revise Stormwater Requirements Applicability Checklist DS-560 as the answer for Part F items # 2 suppose to be Yes. Per the provided form DS-560 project is a standard development project, Submit a completed Form I-4 and Form I-5 that addresses how the 8 possible Low Impact Development (LID) BMPs and 6 possible Source Control BMPs have been incorporated into the project. If any of the 14 possible BMPs have not been applied in the project design, add a discussion in the form why the omitted BMPs are not feasible or not applicable.

[Comment 00011 | Page]

A copy of the Standard SWQMP forms I-4 and I-5 can be downloaded from: <https://www.sandiego.gov/development-services/industry/landdevcode/landdevmanual#stormwaterstandardsmanual2018>

[Comment 00012 | Page]

Please show/call out existing and proposed grade and elevations as well as property line (PL) on the Building sections.

[Comment 00013 | Page]

Please revise the Impervious Area Summary table as the total amount of site to be graded does not match the total disturbance area

[Comment 00014 | Page]

Survey sheet is missing from the submitted plans. Please submit it for the review

[Comment 00015 | Page]

Please provide a typical section of Camino De La Costa

[Comment 00016 | Page]

Please note Public Utilities Department (PUD) needs to be part of this review, Project Manager was informed accordingly

[Comment 00017 | Page]

Please provide a detailed written response to all comments regardless you agree or not and in case of disagreement express your reasoning

DSD-Environmental

Marlene Watanabe
mwatanabe@sandiego.gov

[Comment 00032 | Page]

GENERAL:

These comments are draft and subject to change until presented by the City's assigned Development Project Manager in conjunction with the project Assessment Letter. Staff is unable to process formal, intermediate plan changes and



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updates outside the full submitted cycle. A formal response to these comments must be made through the resubmittal process in response to the full Assessment Letter. Your DSD Development Project Manager can assist with further questions.

Applicant written response to all of staff's comment are required with each resubmittal. In addition, any technical reports that require revisions must be provided in a **strikeout underline (SOUL) WORD** format and a PDF clean version. Not providing a SOUL format may delay the review of the technical study.

[Comment 00033 | Page]

SCOPE: The project proposes a Coastal Development Permit and Site Development Permit to demolish an existing 3,036 square-foot (sf) 2-story residence and construct a new 3-story 10,567 sf residence with decks located at 6110 Camino de la Costa. The 0.37-acre site is in the RS-1-5 Zone and Coastal Overlay (Appealable) Zone within the La Jolla Community Plan area. Council District 1.

[Comment 00034 | Page]

Aesthetics/ Visual:

The project would be conditioned to meet setback and height requirements per the Land Development Code (LDC). The project proposes to demolish within an existing residential neighborhood. The project is located on a coastal bluff on Camino De La Costa, which is designated as an Intermittent or Partial Vista and is in close proximity to a portion of Avenida Cortez which is designated as a Scenic Overlook per the La Jolla Community Plan. Please defer to LDR-Planning's review for any comments regarding height, setbacks, or community character comments.

[Comment 00035 | Page]

Biological Resources:

The project site is currently developed with a single-family residence and is surrounded by existing development aside from the coastal bluff on the western side. Review of aerial and street level photography appears to show that the project site does not contain any sensitive biological resources. However, the project site is located on a sensitive coastal bluff and therefore, is required to comply with the Environmentally Sensitive Lands Regulations. The project site does not contain any sensitive riparian habitat or other identified habitat community. Furthermore, the project site does not contain, nor is it adjacent to, the City of San Diego Multi-Habitat Planning Area (MHPA) designated lands. EAS has no further comments related to this issue.

[Comment 00036 | Page]

Geological Conditions:

The site is partially located in GHC 12, fault buffer zone characterized by potentially active, inactive, or activity unknown faults with a low to moderate risk and GHC 43, generally unstable, unfavorable jointing, local high erosion, as shown on the City's Seismic Safety Study Geologic Hazard Maps. A Geological Investigation dated July 15, 2022 was received. EAS defers to Geology on geologic issues and review of the Geological Investigation. Please address any comments made by LDR-Geology on the submitted report.

[Comment 00037 | Page]

Historical Resources (*Built Environment*):

The project site is developed with an existing single-family residence that was constructed over 45 years ago in 1924. A Historical Resource Technical Report dated April 26, 2022 was received for the project site. EAS defers to LDR-Historic on built environment issues and review of the Historic Resources Report. Please see their comments.

[Comment 00038 | Page]

Archaeological Resources:



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EAS is working with qualified City staff to determine if the project requires additional information (survey, etc.) and/or potential monitoring.

The site plans indicate the following earthwork: maximum depth of cut: 11 feet, amount of fill: 20 yards, maximum depth of fill: 3 feet, amount of soil export: 2800 yds. Please indicate the quantity of cut in cubic yards. Additionally, please confirm earthwork quantities capture the total amount of excavation (in cubic yards) and depth (feet) required for the entire project (sewer and water lines, footings).

Please provide an estimate of grading/excavation quantities in native soils, if available.

[Comment 00039 | Page]

Tribal Cultural (AB52):

Please note, all discretionary projects are subject to AB 52 consultation.

[Comment 00040 | Page]

Hydrology/WQ:

The proposed site is designated for Flood Zone X, which indicates an area of minimal flood hazard and Flood Zone VE, which indicates a 100-year floodplain. For technical analysis EAS defers to Engineering on storm water, drainage, and hydrology requirements. Any comments made by LDR-Engineering on this issue area must be addressed before EAS can make an environmental determination on the project.

[Comment 00041 | Page]

Paleontological Resources:

According to the Geotechnical Investigation, the project site is underlain with Artificial Fill (Qaf) to depths ranging from 5 feet within the eastern portion of the lot to about 8 ½ feet along the southwest side of the existing residence. Quaternary age Old Paralic Deposits (Qop) were encountered underlying the central and eastern portions of the site to depths of about 8 feet to 13 feet from existing grades. Cretaceous-age sedimentary deposits of the Point Loma Formation (Kp) underly the artificial fill and old paralic deposit within the central and eastern portions of the site and crop out along the central and lower bluff face.

Fill soil is considered to have no sensitivity, Old paralic deposits, Unit 7 and Point Loma Formation are considered to have a high sensitivity for the discovery of paleontological resources.

The City's Significance Determination Threshold determines potential significant impacts to paleontological resources if the project would require over 1,000 cubic yards of excavation in a high resource potential geologic deposit/formation/rock unit to a depth of 10 feet. Please be aware that monitoring may also be required for shallow grading (less than ten feet) when a site has been previously graded and/or unweathered formations are present at the surface.

As noted above, the site plans indicate the following earthwork: maximum depth of cut: 11 feet, amount of fill: 20 yards, maximum depth of fill: 3 feet, amount of soil export: 2800 yds. Please indicate the quantity of cut in cubic yards. Additionally, please confirm earthwork quantities capture the total amount of excavation (in cubic yards) and depth (feet) required for the entire project.

Please provide an estimate of grading/excavation quantities in native soils, if available.

Until this information is provided, EAS cannot address this issue area.

[Comment 00042 | Page]

Transportation:

As a result of Senate Bill 743, an update was needed to address the required shift from a level of service (LOS) analysis to a vehicle-miles travelled (VMT) CEQA analysis. There is a project screening process, and new requirements for both a



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project's CEQA transportation impact analysis and Local Mobility Analysis (LMA). The project is presumed to have a less than significant VMT impact because it is a small project generating less than 300 daily trips. All pertinent information will be included within the appropriate environmental document. No further comment is required.

[Comment 00043 | Page]

GHG:

EAS has reviewed the CAP Consistency Checklist and is requesting revisions. Please fill out the most recent CAP Consistency Checklist revised in June 2017. Additionally, please see the comments made in the CAP Consistency Checklist and revise and resubmit.

[Comment 00044 | Page]

Environmental Determination:

Until the requested information has been provided, staff is not able to complete the environmental review for the project and the environmental processing timeline will be held in abeyance. EAS will coordinate with the other reviewers as the review progresses regarding any additional potential environmental impacts.

Please be aware that the environmental review may change in response to any project changes and/or new information. Additionally, the new information may lead to the requirement of new and/or additional technical studies. A determination as to the appropriate environmental document will be made based on all reviewed and submitted information.

DSD-Geology

Kreg Mills
KMills@sandiego.gov
(619) 446-5295

[Comment 00045 | Page]

The project's geotechnical consultant must submit an addendum geotechnical report or update letter for the purpose of an environmental review that specifically addresses the proposed development plans and the following:

The project's geotechnical consultant should provide a conclusion regarding if the proposed development will destabilize or result in settlement of adjacent property or the City's right of way.

The project's geotechnical consultant should provide a conclusion regarding if the proposed development will contribute to instability of the coastal bluff.

The project's geotechnical consultant must provide a *professional opinion* that the site will have a factor-of-safety of 1.5 or greater for both gross and surficial stability following project completion.

The project's geotechnical consultant should provide a statement as to whether or not the site is suitable for the for the proposed development.

[Comment 00046 | Page]

The requested addendum/update letter must be uploaded with the "**Geotechnical Investigation Report Addendum**" PDF file option only.

Please note, to avoid additional reviews, do not attempt to submit any additional document using the "Geotechnical Investigation Report" PDF file option as this will overwrite the previously submitted record geotechnical document for the project.



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Please note, geotechnical documents that are uploaded incorrectly are unacceptable as record documents.

[Comment 00047 | Page]

Please note, storm water requirements for the proposed conceptual development will be evaluated by DSD-Engineering review. Priority Development Projects may require an investigation of storm water infiltration feasibility in accordance with the City's current Storm Water Standards. Check with your DSD-Engineering reviewer for requirements. DSD-Engineering may determine that an DSD-Geology review of the storm water infiltration evaluation is required.

Site Development Plans PRJ-1066101.pdf

DSD-Historic

Suzanne Segur
SSegur@sandiego.gov
(619) 236-6139

[Comment 00084 | Sheet T1.0]

- The property located at 6110 Camino de la Costa, is not an individually designated resource and is not located within a designated historic district. However, San Diego Municipal Code Section 143.0212 requires City staff to review all projects impacting a parcel that contains a structure 45 years old or older to determine whether a potentially significant historical resource exists on site prior to issuance of a permit. (Info Only, No Response Required)
- During this review buildings are evaluated for eligibility under local designation criteria. The designation criteria and guidelines for their application can be found on the City's website:
- More information regarding this review process can be found in Information Bulletin 580:
- If City staff determines after review of these documents that no potentially significant historical resource exists on site, the parcel will be exempt from further historical review for five years from this date unless new information is provided that speaks to the building's eligibility for designation. (Informational Only; No Response or Action Required)
- If City staff determines that a potentially significant historical resource exists on the site, all modifications and additions will be evaluated to determine consistency with the Secretary of the Interior's Standards for Treatment of Historic Properties (Standards). If the proposed project is consistent with the Standards, the permit process may proceed and the parcel will require additional review for all future modifications. If the proposed project is not consistent with the Standards, the applicant may redesign the project or prepare a historic report that evaluates the building's integrity and eligibility under all designation criteria. (Informational Only; No Response or Action Required)
- The applicant has submitted a Historical Resources Technical Report by Brian F. Smith and Associates dated April 26, 2022. The report concludes that the property is significant under HRB Criteria A, B, C and D as well as California Register Criteria 1, 2 & 3.
- The report cannot be deemed complete at this time. Please make the following revisions:

[Comment 00085 | Sheet T1.0]

- Under Criterion A, the property must be a "special element" of development, not just reflect development in a general way. Please provide more information as to why this property is unique among the other early homes in La Jolla Hermosa.

[Comment 00086 | Sheet T1.0]



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- Under Criterion B, please provide more information about other properties associated with Herbert York such as former residences, laboratories or offices. Please identify which of these properties is best associated with York during his most productive years.

DSD-Landscape Review

Clare Gamelin
CGamelin@sandiego.gov
(619) 446-5228

[Comment 00018 | Sheet L1.0]

Updates Required: Please resubmit revised plans addressing issues discussed below through Accela. Include a cover letter that clearly explains how and where each issue has been addressed. For questions or further direction, contact reviewer at: cgamelin@sandiego.gov
Refer to the following link for DSD's user guide on electronic submittals:
<https://www.sandiego.gov/sites/default/files/opensd-user-guide-pts-projects.pdf>

[Comment 00019 | Sheet L1.0]

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[Comment 00020 | Sheet L1.0]

Proposed Rear Yard Hardscape: SDMC §143.0143 (f) (2) landscape features shall not be closer than 5 feet to the coastal bluff edge provided. Please show dimensions on landscape plans that demonstrate no hardscape is within the five foot setback.

[Comment 00021 | Sheet L1.0]

Proposed Rear yard Planting: Per SDMC §143.0143(c) Only native or other drought-tolerant plant species shall be used in landscape adjacent to coastal bluffs to minimize the need for irrigation beyond initial plant establishment. Permanent irrigation is not permitted near coastal bluffs. Please show proposed plant pallet adjacent to Coastal Bluff on landscape plan.

[Comment 00022 | Sheet L1.0]

Species Legend: List 2-3 plant species per plant symbol on legend, consistent with the Land Development Manual: Project Submittal Requirements Section 4 - Item 11.1.4 (available online,) in order to allow for flexibilities in design on future construction plans. Plant species listed per symbol should have similar maintenance and growth attributes.

[Comment 00023 | Sheet L1.0]

Landscape Hatch Pattern: Please clarify/identify the yellow hatch pattern on the landscape plan. See sheet L1.0 and L1.1.

[Comment 00024 | Sheet L1.0]

Water Conservation: Please include Water Budget Calculations and hydrazone diagram directly on the plans. MAWA & ETWU calculations are required in order to show compliance under SDMC 142.0413. See Appendix E of the SD



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Landscape Standards for reference. Note that detailed irrigation drawings shall be required with the subsequent construction permits.

[Comment 00025 | Sheet L1.0]

Landscape drainage: Per SDMC §143.0143 (d) all drainage from the improvements on the premises shall be directed away from coastal bluff and directed into existing storm drain system. Please demonstrate location and direction of drainage on the landscape plan.

[Comment 00026 | Sheet L1.0]

Street Trees [SDMC §142.0409]: This project is subject to street tree requirements. The number of required street trees shall be calculated at the rate of one 24-inch box canopy tree for every 30 linear feet of street frontage, excluding curb cuts. Proposed street trees must be consistent with La Jolla community plan (available online) and located away from all utilities. Show the location, species, and size (min. 24" box) on the plans.

[Comment 00027 | Sheet L1.0]

Right-of-Way Planting: Any proposed shrubs must have a mature height of less than 36". Please review proposed plant material located in view triangles and Right-of-way as they are potential view hazards. Please show proposed plant material that at mature height is less than 36" so staff can verify.

[Comment 00028 | Sheet L1.0]

Information Only: It appears that a Right Of Way permit may be required for proposed work in the ROW. Refer to SDMC 142.0409 and 142.0610.

[Comment 00029 | Sheet L1.0]

View Corridors: Per SDMC 143.0144 c a 10 foot side yard set back for public view. Please show this dimension on plans and provide plant species that will be proposed in this view corridor so staff can determine if the landscape will obstruct the public views to the ocean.

[Comment 00030 | Sheet L1.0]

Provide the following note on the Landscape Plan: "Trees shall be maintained so that all branches over pedestrian walkways are 6 feet above the walkway grade and branches over vehicular travel ways are 16 feet above the grade of the travel way per the SDMC 142.0403(b)(11)."

[Comment 00031 | Sheet L1.0]

Provide the following note on the Landscape Plan: "Tree root barriers shall be installed where trees are placed within 5 feet of public improvements including walks, curbs, or street pavements or where new public improvements are placed adjacent to existing trees. The root barrier will not wrap around the root ball." Please clearly identify the installation of root barriers in the locations subject to these conditions per 142.0403(b).



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DSD-Planning Review

Jorge Casique
JCasique@sandiego.gov
(619) 446-5202

[Comment 00048 | Sheet T1.0]

General

These comments are draft and subject to change until presented by the City's assigned Development Project Manager in conjunction with the project Assessment Letter. Staff is unable to process formal, intermediate plan changes and updates outside the full submitted cycle. A formal response to these comments must be made through the resubmittal process in response to the full Assessment Letter. Your DSD Development Project Manager can assist with further questions.

[Comment 00049 | Sheet T1.0]

Project Information

The project site is located at 6110 Camino de la Costa, APN 357-141-0500, within the La Jolla Community Plan. The site is zoned RS-1-5 with overlays including Environmentally Sensitive Lands, Coastal Overlay Zone, Coastal Height Limit Overlay Zone, First Public Roadway Overlay, Parking Impact Overlay Zone, Transit Area Overlay Zone, and Transit Priority Area.

[Comment 00050 | Sheet T1.0]

The project scope consists of demolishing an existing single dwelling unit and constructing a new single dwelling unit of approx. 10,500 sf. with exterior decks.

[Comment 00051 | Sheet T1.0]

Permits

A Coastal Development Permit (CDP) is required pursuant to §126.0702. Pursuant to §126.0706(b), a decision shall be made in accordance with Process Three and this decision is appealable to the Planning Commission pursuant to §112.0506.

[Comment 00052 | Sheet T1.0]

A Site Development Permit in accordance with Process Three is required pursuant to §126.0502(a). Pursuant to 126.0504, the decision is appealable to the Planning Commission in accordance with §112.0506.

[Comment 00053 | Sheet T1.0]

Community Plan Review

The project site is in an area of the La Jolla Community Plan designated low density residential with a density of 5-9 du/ac (p.3). The proposed development, which replaces an existing single dwelling unit with a new single dwelling unit, is consistent with the land use designation.

[Comment 00054 | Sheet T1.0]

The Natural Resources and Open Space System element of the community plan includes recommendations to preserve and enhance visual resources throughout the community (p.45). It states, "Where new development is proposed on property that lies between the shoreline and the first public roadway, preserve, enhance or restore existing or potential view corridors within the yards and setbacks by adhering to setback regulations that cumulatively, with the adjacent



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property, form functional view corridors and prevent an appearance of the public right-of-way being walled off from the ocean. (Section 2h).

The main structure appears to observe the minimum side yard setbacks for the full depth of the structure. However, the development plans show proposed 6' tall fencing within both side yard setbacks potentially obstructing views to the ocean from the public right-of-way. For further information on proposed fencing, please refer to comments in the "Development Review" section below.

[Comment 00055 | Sheet T1.0]

The Natural Resources and Open Space System element of the community plan includes recommendations to preserve and enhance coastal bluffs (p.48). It states, "Prohibit coastal bluff development, on or beyond the bluff face, except for public stairways and ramps to provide access from the bluff top to the beach or to maintain bluff stability" (Section 4a).

For the proposed development to be consistent with policies of the Community Plan and Local Coastal Program, redevelopment of the site requires that all existing improvements located on or beyond the bluff face be removed and the areas be restored to their natural state.

Additionally, it recommends to "Set back new development on property containing a coastal bluff at least 40 feet from the bluff edge so as to not impact the geology and visual quality of the bluff. This setback may be reduced to not less than 25 feet if evidence is provided that indicates the site is stable enough to support the development at the proposed location without requiring construction of shoreline protective measures throughout the economic lifespan of the structure (not less than 75 years) (Section 4b).

Discussions between City staff and Coastal Commission staff have determined the information provided is inadequate to determine if a reduced 25' bluff edge setback may be permitted. Please refer to the following comments:

- The assessment for the potential of erosion of the upper bluff over the next 75 years was not adequate with respect to anticipated sea level rise. Sea level rise is expected to accelerate erosion rates along the state's coast as compared to historic erosion rates. As the neighboring properties have shoreline protection and sea caves already present, please provide further explanation as to how the anticipated sea level rise described in the Coastal Commission's Sea Level Rise Policy Guidance (<https://www.coastal.ca.gov/climate/slr/>) will impact erosion rates on the property in the future, with distinction made between sturdier lower bluff and the more vulnerable upper bluff. The current study's claim of no change is not supported by the analysis provided.
- Please provide a wave runup analysis that includes sea level rise scenarios of up to seven feet and an analysis of the potential for upper bluff erosion over the next 75 years to assess the adequacy of the proposed twenty-five-foot setback.
- The proposed residence contains a substantial basement that would excavate the majority of the developable area of the blufftop. Due to shoreline erosion, the basement may become exposed and require partial removal which, due to its size, presents a substantial risk due to the resulting void in the blufftop. The applicant is requested to provide an analysis of how future removal of the basement would impact geologic stability.

The plan also recommends that new development "Require applicants to accept a deed restriction to waive all rights to protective devices associated with new development on coastal bluffs" (p.48, Section 4b). Staff will provide further information on this requirement on subsequent reviews, to determine the method of implementation for this requirement.

[Comment 00056 | Sheet T1.0]

The Transportation Systems element of the community plan provides recommendations for adequate parking development within the community (p. 61). It states, "Require that all proposed development maintain and enhance public access to the coast by providing adequate parking per the Coastal Parking regulations of the Land Development Code" (Section 4e).

Pursuant to §142.0560(j)(8), the property would be permitted to have one curb cut. A second curb cut would only be permitted for lots has at least 100' of total street frontage. For further information on parking requirements, please refer to comments in the "Development Review" section below.



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[Comment 00057 | Sheet T1.0]

The Residential Land Use element of the community plan provides recommendations to maintain and enhance the community character of La Jolla (p.76). It states, "In order to regulate the scale of new development, apply development regulations to all residential properties in La Jolla that proportionally relate the building envelope to the existing lot dimensions" (Section 2b).

The proposed development includes portions of the structure that encroach beyond the front yard setback and up to the front property line and is inconsistent with the policies of the community plan. For further information on setback requirements, please refer to comments in the "Development Review" section below.

[Comment 00058 | Sheet T1.0]

The Residential Land Use element of the community plan provides recommendations to regulate development near coastal bluffs (p.77). It states, "As a condition of new development, require a waiver of liability against the public and any governmental agency for liability due to damage from storm waves to real property associated with the improvement which should be recorded as a deed restriction against the property" (Section 3j).

Staff will provide further information on this requirement on subsequent reviews, to determine the method of implementation for this requirement.

[Comment 00059 | Sheet T1.0]

The Heritage Resources element of the community plan provides recommendations to "Evaluate potentially significant cultural or paleontological sites as part of a discretionary and/or Environmental review process" (p. 113, Section 4). DSD-Planning defers to DSD-Historic on this issue.

[Comment 00060 | Sheet T1.0]

To provide an adequate analysis of the proposed development relative to existing improvements as it pertains to applicable requirements, please provide a set of As-Built plans for the existing development.

[Comment 00061 | Sheet T1.0]

ESL Review

Pursuant to §143.0140(a), "Environmentally sensitive lands that are outside of the allowable development area on a premises shall be left in a natural state and used only for those passive activities allowed as a condition of permit approval. The landowner may elect to offer to dedicate in fee the undeveloped remainder portion of the premises to the City to relieve the land owner of management and liability obligations associated with that portion of the premises. Otherwise, the passive activities allowed on the undeveloped remainder of the premises and any other conditions of the permit shall be incorporated into a covenant of easement that shall be recorded against title to the property, in accordance with procedures set forth in Section 143.0152."

For the next submission, please identify in the applicant responses which option is to be elected. Once a selection is made, staff will provide additional comments as applicable. Additionally, after all other project issues have been addressed, update the site plan to show, label, and dimension the boundary separating all areas of the site to be preserved in their natural state.

[Comment 00062 | Sheet T1.0]

Pursuant to §143.0143(a), "No development is permitted on the face of a sensitive coastal bluff, except as permitted in Section 143.0143(g) and (h), and the coastal bluff face shall be preserved as a condition of permit approval."

To be consistent with other applicable regulations of the Land Development Code as well as policies from the Community Plan, the existing improvements located on or beyond the bluff face shall be removed and the areas shall be restored to their natural state.

[Comment 00063 | Sheet T1.0]



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Pursuant to §143.0143(b), "On the portion of a premises where development is permitted, the proposed grading shall minimize the alteration of natural landforms and graded areas shall topographically resemble natural landforms of the surrounding area."

The proposed development includes what appears to be a substantial amount of grading within the developable area of the site. To adequately assess the impacts of the proposal, please provide a set of As-Built plans for the existing development and confirm how much, if any, of the existing artificial fill on the site will be removed as part of the project, with special focus given to the fill within 40 feet of the bluff edge.

[Comment 00064 | Sheet T1.0]

Pursuant to §143.0143(f), "All development including buildings, accessory structures, and any additions to existing structures shall be set back at least 40 feet from the coastal bluff edge," except as provided in sub-items (1)-(4).

To adequately assess the proposed development, please provide the information requested in prior review comments.

[Comment 00065 | Sheet T1.0]

Pursuant to §143.0143(j), "Public views shall be preserved pursuant to Section 132.0403," which requires that visual corridors of not less than the side yard setbacks and running the full depth of the premises, be preserved as a deed restriction as a condition of permit approval.

Staff will provide further information on this requirement on subsequent reviews, to determine the method of implementation for this requirement.

[Comment 00066 | Sheet T1.0]

Based on City-mapping data, the site is mapped with Special Flood Hazard area which constitutes a separate type of ESL than coastal bluffs. DSD-Planning has reached out to DSD-Engineering to confirm the presence of any special flood hazard areas on site in order to determine applicability of ESL regulations. Further comment will be provided on subsequent reviews.

[Comment 00067 | Sheet T1.0]

Development Review

Provide a curb-to-property line dimension on the site plan. Please refer to DSD-Engineering review for any additional comments on this item.

[Comment 00068 | Sheet T1.0]

Pursuant to §131.0431(b), the required front yard setback for the RS-1-5 zone is 20'. The proposed development does not comply with the required setback. Revise to conform.

[Comment 00069 | Sheet T1.0]

Provide a diagram to demonstrate how the side yard setbacks were calculated, in accordance with the required .08 setback for the RS-1-5 zone and the rules for calculating lot width, pursuant to §113.0243(c)(1).

[Comment 00070 | Sheet T1.0]

The development plans show proposed fencing within the front yard setback, identified to be 6' in height. Please note that fence height within front yard setbacks is regulated by §142.0310(c) depending on the type of fence proposed (open vs closed). Provide an elevation of a typical 6' section of fence to demonstrate compliance.

Additionally, some of the fencing proposed appears to be within required visibility triangles for driveways. Pursuant to §142.0310(b), fencing within visibility areas shall not exceed 3' in height. Revise as necessary. To show compliance for all proposed fencing, callout all fence heights for all proposed fencing on the site plan and provide the elevations



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previously requested.

Pursuant to §142.0403(e), open fencing may be permitted within view corridors and visual accessways, provided such improvements do not significantly obstruct public views of the ocean. Any fencing located within the required visual accessways that run the full depth of the lot at the minimum required side yard setbacks, shall be open fencing. As defined in §113.0103, open fence within the Coastal Overlay Zone shall be at least 75% open to light.

[Comment 00071 | Sheet T1.0]

Pursuant to §113.0243(b)(3), the at-grade space running along the front façade of the first floor that sits directly below the second floor, may count toward the GFA/FAR calculations if the projection of the second floor is at least 4' from the face of the first floor. Provide a dimension of this projection on the first-floor plan. If this dimension is at least 4', update the FAR analysis on the title sheet and Sheet A1.5 as needed.

Similarly, the area adjacent the basement bar, this sits directly below the kitchen on the main floor, may count toward the FAR if the projection above is at least 4'. Dimension and revise as needed.

[Comment 00072 | Sheet T1.0]

The proposed development may exceed the maximum 30' plumb line height in the rear of the structure. Plumb line height is measured from any point on the structure to the grade elevation directly below. Accordingly, portions of the rear façade may exceed 30' in height when measured to the grade directly below.

To demonstrate compliance, provide dimensions on all longitudinal section drawings to show the structure does not exceed 30' in height at any point along the western-most façade.

[Comment 00073 | Sheet T1.0]

Pursuant to §113.0261, basement level is considered the first story given the main floor has portions where the finish floor elevation would be more than 2'-6" above grade. Subsequently, since the top floor is considered the third story, this floor shall conform to the maximum width and depth requirements of §131.0460. Provide the necessary dimensions to show this conforms or revise accordingly.

[Comment 00074 | Sheet T1.0]

Demonstrate how the proposed development conforms to §142.0805.

[Comment 00075 | Sheet T1.0]

The south elevation shows a "cast-in-place retaining wall" that isn't called out on any other drawings. Provide more information to demonstrate this wall conforms to the maximum permitted height, pursuant to §142.0340.

[Comment 00076 | Sheet T1.0]

The site plans show a 5' offset line around the perimeter of the structure and the lowest grade on that line is called out. Please revise this to include the actual elevation of that point for the lowest grade. Additionally, call out and label the highest elevation grade on that line.

The difference between these two elevations is used in determining overall and coastal structure height. If the difference is less than 10' between these two points, the maximum height shall be the 30' height limit plus the difference in elevation between the two points.

[Comment 00077 | Sheet T1.0]



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CAP Checklist

The CAP Checklist provided is incomplete. Please revise and resubmit.

[Comment 00078 | Sheet T1.0]

Additional Comments

Please contact the La Jolla Community Planning Association to have them review the proposed development. Upon review, provide the association's vote or recommendation for City staff to review.

[Comment 00079 | Sheet T1.0]

Staff may provide additional comments on subsequent reviews if deemed necessary.

[Comment 00080 | Sheet T1.0]

For the next review, please provide the following items:

- a) Revised Building Construction Plans
- b) Applicant Responses to Issues