

CALIFORNIA COASTAL COMMISSION

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May 21, 2024

Suchitra Lukes
City Planning Department
Sent Via Email Only To: planuniversity@sandiego.gov

Re: Draft University Community Plan

Dear Ms. Lukes:

Thank you for the opportunity to provide feedback on the draft University Community Plan/Land Use Plan Update. Given the Commission's limited staff capacity, we cannot provide an exhaustive review of the draft Community Plan or the Draft EIR, but nevertheless hope these preliminary comments and questions are useful in developing a Community Plan consistent with the requirements of the Coastal Act.

As general background, we note that in response to Commission staff recommended modifications for other community plans, City staff have indicated that the language of a plan should "reflect the nature of a community plan as a policy, rather than regulatory document." The City's community plans within the Coastal Zone, including the University Community Plan, serve as the Land Use Plan (LUP) portion of the City's Local Coastal Program, and a LUP is a critical regulatory document for managing development and land use activities along the city's coastal areas. It provides a framework for decision-making and regulation, and, in addition to the City's Implementation Plan (the Land Development Code), serves as the basis for evaluating permit applications, which includes ensuring that proposed projects align with the goals and regulations outlined in the plan. Consistency with the LUP carries at least equal weight and authority as consistency with the LDC.

Thus, while some goals may be appropriately written as aspirational, Land Use Plans/Community Plans must be sufficiently detailed, specific, and mandatory with regard to resource protection and development policies to ensure consistency with the Coastal Act. (See Pub. Resources Code, §§ 30108.5, 30200(a) and 30512.) Strict compliance with the LUP is essential for promoting sustainable coastal management and preserving the unique character and resources of San Diego's coastline. (See *Charles A. Pratt Construction Co. v. California Coastal Com.* (2008) 162 Cal.App.4th 1068, 1075-76 [LCP and the development permits issued by local governments are not solely a matter of local law, but embody state policy]).

As such, Commission staff will continue to identify and suggest modifications to language in the City's LUP amendments to implement Coastal Act policies where language is vague or insufficiently obligatory. Modifications typically include changing "should" or "may" to

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“shall;” “encourage,” “consider,” or “prioritize” to “shall” or “require;” “minimize” to “avoid;” and deleting phrases such as “where feasible.”

The plan is organized with a series of goals and an “Implementation” chapter. Page 42 of the draft plan states that “the Local Coastal Program for the Coastal Zone areas in the University Community are integrated into this Community Plan. The Implementation chapter contains policies to protect and enhance coastal resources....” The various references to the implementation portion of this plan may be somewhat unclear as written, since as noted above, the University Community Plan serves as a segment of the City’s Land Use Plan, and the LDC is the “Implementation Plan” portion of the City’s Local Coastal Program. Under the Coastal Act, this distinction is significant, as the standard of review for Land Use Plan amendments is the Coastal Act, and the standard of review for Implementation Plan amendments is the LUP. Page 14 describes the Local Coastal Program aspect of the plan, and may be an appropriate location to clarify the status of the Community Plan as a segment of the City’s LUP.

As noted on page 17, this Community Plan differs from the 1987 Community Plan in that it “lifts previous restrictions on land use and development intensity in order to promote more flexibility and mixed use development opportunities. It also allows for higher density and intensity development in the North University area, which aligns with General Plan recommendations for additional homes and jobs within walking and bicycling distance of the trolley stations.” The existing University Community plan requires that any changes to land use and development intensity be reviewed by the Coastal Commission through an LCP Amendment. The existing plan also requires a “Transportation System Management” program to be approved by the City Council and the Coastal Commission through an LCP Amendment.

The intent of this requirement in the existing plan was to ensure that new development and density increases near the coast did not negatively impact public access and recreation by increasing traffic as well as the demand for automobile parking without providing sufficient additional parking to offset this increase in demand, thus leading to difficulty reaching the coast and fewer parking spaces available to the public for coastal access. Evaluating these impacts is particularly important for visitors and inland residents who do not live near the shoreline, for whom a trip to the beach often means using a car to transport people, pets, food, drink, and beach equipment to shoreline destinations, particularly when there is a dearth of transit alternatives to reach the beach.

As such, the Coastal Commission and many local governments implementing their LCPs have imposed minimum parking requirements to ensure that new development is consistent with the policies of the Coastal Act and certified LCPs, including those relating to public access and recreation. However, Coastal Act policies also strongly support the provision of alternative forms of transit to private vehicles, as well as bicycle and pedestrian improvements. Increases in density can provide opportunities to implement alternative transit and circulation improvements and as such, can reduce greenhouse gases. The draft plan contains many goals regarding transit-oriented development, mobility

hubs, and other circulation improvements, including a policy goal to “increase accessibility to the beaches and shoreline in a manner compatible with resources protection” (p. 178).

In all cases, Land Use Plans should ensure that public access and recreation opportunities are protected, enhanced, and maximized. It is not enough to simply provide access to and along the coast, and not enough to simply protect access; rather such access must also be maximized. Section 30500 of the Coastal Act requires that each LCP contain a specific public access component to assure that maximum public access to the coast and public recreation areas is provided.

In order to ensure that public access to the shoreline specifically is supported by the plan, and to allow flexibility for future implementation of projects such as lane diets, staff recommends the following goals and policies be added to the plan:

Goal:

Multimodal access to the biological, cultural, and recreational value that beaches and other coastal resources offer is important for people who live, work and visit within the community. Having a balanced transportation system with multimodal infrastructure that safely and efficiently moves people of all ages, incomes, and abilities will provide additional mobility options that help to reduce greenhouse gas emissions and vehicle miles traveled. This will help to support a healthier future.

Policies

1. Pursue mobility projects and programs throughout the City that support sustainable, equitable, and safe ways to move around such as walking, bicycling and transit, in order to help to reduce vehicle miles traveled (VMT) to meet State, regional, and local climate and mobility goals. This can include mobility projects that repurpose existing streets or other public rights-of-way, and mobility programs that can replace single-occupancy vehicle trips, such as:
 - a. Provide new bicycle and pedestrian lanes or pathways.
 - b. Enhance existing pedestrian and bicycle facilities to address safety and public access issues.
 - c. Reduce or repurposing vehicle travel lanes to enhance multimodal access within the public right-of-way.
 - d. Modify or replace on-street vehicle parking with sustainable transportation facilities where the right-of-way does not yet provide high-quality multimodal access, and where adequate, alternative parking for coastal access will remain available nearby. This can include, but is not limited to, parking conversion through restriping for transit, pedestrian, and bicycle access enhancements.
 - e. Use temporary closures of streets to vehicle traffic, where alternative vehicular access currently exists, to enhance the right-of-way for more vulnerable roadway users during special events.
 - f. Provide transit infrastructure, such as dedicated travel lanes, turnout

- areas, crosswalks, shelters, and stations.
- g. Providing improvements for shared mobility services, such as ride-share, electric scooters and bikeshare to increase public access.
 2. Encourage public coastal access through operational measures that include, but are not limited to, greater turnover of public parking through time-limited and/or priced parking and through increased transit, neighborhood circulator services, and micromobility options. Paid and time-limited parking should not unreasonably interfere with the public's ability to access the shoreline or discourage the use of public visitor and recreational facilities. In areas in the Coastal Zone where street parking is used for beach or park access, a minimum of 4-hour parking shall be allowed. Parking fees should generally be comparable to those charged at similar public facilities in the region, and should only be considered as part of a program that provides access for low-income users. Parking revenue collected in the Coastal Zone shall be directed towards the provision of alternative transit options within the Coastal Zone.
 3. Consider all forms of travel when providing multimodal access to coastal recreation areas.
 4. Ensure that mobility projects are consistent with habitat protection policies and standards, such as wetland buffers and the protection of environmentally sensitive habitat.
 5. Projects in the Coastal Overlay Zone that result in changes to the planned or ultimate roadway classifications of major coastal access roadways or remove on-street vehicle parking shall assess the project's effects on public coastal access with regards to biking, walking, transit access, and vehicle circulation through a coastal development permit. Where appropriate, this analysis should include quantitative assessments of levels of service on major coastal access roadways, and/or qualitative assessments of how travel times resulting from the project will affect the ability of the public to access the coast and other public recreational resources such as trails and parks. In particular, the analysis should consider potential impacts to the ability of environmental justice or disadvantaged communities to access the coast and options for avoiding such impacts. Where an analysis identifies unavoidable impacts, roadway modification projects shall be accompanied by additional public access benefit enhancements promoting equitable multimodal access. Public access benefit enhancements may include, but are not limited to, increased transit services, improved pedestrian and cyclist access, and increased public parking.
 6. Monitor the effects of a mobility project on public coastal access and other public recreational resources such as trails and parks, where applicable, for bicycle, pedestrian and transit access, and vehicle circulation. Where impacts to public access are identified, off-setting public access benefit enhancements shall be pursued.
 7. Protect existing City-owned parking for coastal access.

As cities implement measures to reduce reliance on individual cars, planning documents should recognize that public access to the shoreline still largely relies on cars and parking along the coast. It is important to maintain existing public parking that is used to access the shoreline and recreational areas. The existing Community Plan requires “a minimum of 187 public parking spaces be retained on public land [the location of what is now the Hilton La Jolla Torrey Pines] for golf course uses; in addition, at the adjacent Lodge at Torrey Pines, there are 40 parking spaces reserved daily for golfers and 94 parking spaces reserved during tournaments.” (Footnote 1 to Table 2 Land Use and Development Intensity). This requirement was added through San Diego LCPA 2-98-A where the Commission found these parking lot spaces must be identified and protected as a public parking resources that provides access to public coastal recreational sites such as the golf course and State Reserve (staff report: <https://documents.coastal.ca.gov/reports/1998/8/W12a-8-1998.pdf>). The existing plan should retain policies that identify and protect these parking spaces for public use.

The existing community plan notes that “areas where excess and under-utilized parking exists during summer daylight hours, such as UCSD, could provide a parking reservoir for future shuttle systems to beach areas.” This should remain a goal of the proposed plan.

Portions of UCSD could also provide a general parking reservoir on weekends and holidays to help support the high demand for beach access parking on La Shores Drive. A goal of the plan should be to work with UCSD on opportunities to provide coastal access parking at the University during periods of low University use such as weekends, holidays, and summers.

Other existing parking lots near recreational areas can also serve as a general public parking reservoir. Please consider the following policy:

A program to utilize existing parking facilities for office and commercial development located near beaches and other coastal recreational areas for public access parking during periods of normal beach use when such development is not open for business should be developed. Where feasible, new non-visitor serving office or commercial development may be required to provide public parking for beach and coastal access during weekends and holidays.

In the past, there have been conflicts between people seeking to use public parking lots at the Torrey Pines Gliderport and other public parking areas during major golf tournaments at Torrey Pines, as well as use of the Gliderport itself during events. Policies in the plan should outline how public access and recreation will be maintained during major events at the golf course, including requirements for public access management plans requiring public notice, signage, alternative means of access if closure of public lots is ever necessary.

Page 36 lists the residential land use densities for the University Community. Commission staff have recently received public inquiries regarding how the various density bonus

programs in the Land Development Code are consistent with the density limits contained in Community Plans. The City should consider adding language acknowledging that these density limits may be exceeded through density bonus programs.

Page 42 notes that Coastal Development Permits are issued by the City. However, Currently, the 75-acre Torrey Pines City Park is an area of deferred certification (ADC). It was designated as an ADC due to the lack of a master plan addressing the coastal bluffs, their stability, and public access needs. Please confirm that this area is to remain an ADC, where the Coastal Commission retains coastal permit authority.

As discussed above, in order to ensure the Land Use Plan policies implement the mandatory requirements of the Coastal Act, staff suggests the following revisions to the introduction to the Implementation Chapter on page 166:

These tables, combined with the zoning information in the Land Development Code, provide a framework to guide development. These tables ~~should~~ will be used by City staff and decision-makers to assess if a development should be considered consistent with this community plan. The Community Plan Policies, reflect specific direction, practice, guidance, or directives to support and implement this plan's land use, mobility, urban design, parks, and public facilities goals. The policies are listed in a comprehensive table for ease of use. Development projects ~~should make every effort to~~ shall conform with all applicable policies.

On page 177, staff recommends the following revision to policy S:

Maintain natural drainage systems and minimize the use of impervious surfaces to protect open spaces and coastal watersheds. Ensure Concentrations of runoff ~~should be~~ is adequately controlled through pervious areas, vegetated swales, and retention basins to prevent downstream erosion.

On page 178, because the City's Vernal Pool Habitat Conservation Plan has not been incorporated into the City's LCP, staff recommends the following revisions:

Preserve and manage vernal pools in accordance with the Vernal Pool Habitat Conservation Plan. Seek opportunities to restore vernal pools where appropriate, including working cooperatively with property owners. Vernal pool habitat in the Coastal Zone shall be preserved and shall be protected from encroachment and urban runoff with appropriate setback and buffers.

On page 180, Policy 5.11 contains several policies regarding Paleontology and Archaeological Resources. Staff believes in order to fully protect these resources the following specific policies should be added:

Development shall be sited and designed to avoid adverse impacts to archaeological and paleontological resources to the maximum extent feasible.

- a. If there is no feasible alternative that eliminates all impacts to these resources, then the alternative that would result in the fewest or least significant impacts to archeological and paleontological resources shall be selected.
- b. Where development would adversely impact archaeological or paleontological resources as identified by the State Historic Preservation Officer, adequate data recovery and mitigation for adverse impacts to archaeological and Native American sites as part of development shall be provided; including measures to monitor and recover buried deposits from the tribal cultural, archaeological and historic periods, under the supervision of a qualified archaeologist and a Native American monitor.

The portion of the plan area within the Coastal Zone includes two hotels in an area designated for commercial recreation. The planning area also contains the Torrey Pines golf course. Commercial recreation uses are a high priority use in the Coastal Zone, and the plan policies must provide for the provision and protection of visitor-serving commercial and recreational uses. In particular, lower-cost overnight accommodations should be encouraged. Staff recommends adding the following policies:

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

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.

The use of private lands suitable for visitor-serving commercial recreational facilities designed to enhance public opportunities for coastal recreation shall have priority over private residential, general industrial, or general commercial development, but not over agriculture or coastal-dependent industry.

Upland areas necessary to support coastal recreational uses shall be reserved for such uses, where feasible.

Lower-Cost Visitor Accommodation in the Coastal Zone. New high-cost overnight accommodations shall provide at least 25% of the proposed units as lower-cost accommodations on-site. If provision of lower-cost units on-site is determined to be infeasible pursuant to a feasibility analysis, then the new development shall provide lower-cost units elsewhere within the City's Coastal Zone. If provision of lower-cost units off-site in the City's Coastal Zone is determined to be infeasible pursuant to a feasibility analysis, then the new development shall provide lower-cost units elsewhere within the San Diego County Coastal Zone. If it is determined that the project cannot provide lower-cost units on or offsite, in-lieu fees shall be required. An in-lieu mitigation fee of \$137,000 per room adjusted for inflation using the Turner

Building Cost Index plus land cost square footage shall be required. Land cost calculations shall be based on the average square footage of commercial land sales in the City over the past five years. The fee shall be used for construction of new lower-cost hotel rooms or other inherently lower-cost accommodations within the coastal zone in the City. All in-lieu fee payments shall be deposited into an interest-bearing account, to be established and managed by the State Coastal Conservancy, or a similar entity approved by the Executive Director of the California Coastal Commission, which shall only be used for the provision of new lower-cost overnight accommodations. Funds may be used for activities including land acquisition, construction, permitting, or renovation that will result in the provision of additional lower-cost overnight visitor accommodations. If any portion of the in-lieu fee remains five years after it is deposited into the interest-bearing account, the funds may be used to provide lower-cost overnight accommodations outside of the City, in the County of San Diego coastal zone.

The proposed plan includes some policies regarding polluted runoff. However, Turf and Integrated Pest Management Policies should be added, with particular regard to the Torrey Pines Golf Course. Please consider the following policies:

In order to protect coastal water quality and prevent or minimize degraded runoff from the Torrey Pines golf course, turf and pest management shall favor non-chemical strategies over chemical strategies for managing weedy species and pests on site.

Turf management practices shall utilize state-of-the-art environmental methods (such as Integrated Pest Management) to minimize water use, fertilizer and herbicide application, and chemical pest control to the maximum extent feasible.

Chemical strategies shall only be employed after all other non-chemical strategies have been considered.

Use of pesticides or rodenticides shall be prohibited.

There are currently storm drain facilities that outfall through and over the bluffs, discharging into the ocean. These outfalls erode the natural bluffs, impact water quality, habitat, and bluff stability. A plan goal should be to develop a long-range plan to relocate these facilities. Please also consider the following storm water management policies:

Prohibit the construction or reconstruction of storm drain discharges over bluffs or into the ocean unless no feasible alternative exists, and all impacts have been minimized and mitigated to the greatest extent feasible.

Maintain storm drain discharge systems to prevent erosion and improve water quality by adequately controlling flow and providing filtration.

Encourage private property owners to design or retrofit landscaped or impervious areas to better capture stormwater runoff, and repair and maintain drainage outfalls and brow ditches that discharge directly to or are within open space lands.

Integrate stormwater Best Management Practices (BMPs) on-site to maximize their effectiveness.

- a. Encourage use of intensive and extensive green roofs and water collection devices, such as cisterns and rain barrels, to capture rainwater from buildings for re-use.
- b. Use downspouts to discharge into areas that can effectively reduce direct flows of rainwater from buildings to the stormwater drainage system.
- c. Minimize on-site impermeable surfaces, such as concrete and asphalt, and encourage use of permeable pavers, porous asphalt, reinforced grass pavement (turf-crete), or cobble-stone block pavement to effectively detain and infiltrate more run-off on-site.

Encourage Low-Impact Development (LID) practices such as bioretention, porous paving, and green roofs, that slow runoff and absorb pollutants from roofs, parking areas and other urban surfaces.

- a. Incorporate bioswales or other appropriate LID design practices where sufficient public rights-of-way and other conditions allow throughout the community.
- b. Prioritize efforts to capture stormwater before it enters canyons or natural open spaces.

Policy 5.10 C in the proposed plan states:

C Ensure exotic or invasive plant species are not [to] be planted within or adjacent to existing sensitive habitats and ensure the removal of non-native species to protect biological resources.

However, it is important that municipalities avoid the use of invasive species throughout the area, including for street tree plantings. Please consider the following policy:

Provide an appropriate mix of both native and low or very low water needs tree types to provide a diverse ecosystem more able to adapt to changing environmental pressures. Prohibit using species that are on the California Invasive Plant Council Inventory.

The plan has various goals supporting bird-safe design and lighting. However, the policies under 2.9 Canyon Adjacent Development apply only to areas adjacent to canyons, open space, and the MHPA. The policies under 2.11 Lighting “limit” upward lighting and note that nighttime lighting “should” be directed towards high-traffic areas. However, more

specific protective policies are appropriate to protect habitat and sensitive species. Migrating birds are vulnerable to bird-strikes and impacts associated with lighting spillover into the night sky in all locations, and policies should ensure that these impacts are avoided or minimized throughout the planning area. Please consider additional policies such as the following:

Bird-Safe Design. Encourage the use of special design and window treatments to improve the degree to which new developments are bird-safe. Green design that facilitates bird safety includes: reduction of reflectivity and transparency in glass, the avoidance of light pollution, reduced disturbance to natural landscapes, and biological systems, and lowered energy use.

Building edges of exterior courtyards and recessed areas shall be clearly defined, using opaque materials and non-reflective glass.

Buildings shall be designed to minimize light spillage and maximize light shielding to the maximum feasible extent according to the following standards:

- i. Nighttime lighting shall be minimized to levels necessary to provide pedestrian security.
- ii. Building lighting shall be shielded and directed downward.
- iii. Up-lighting and use of event “searchlights” or spotlights is prohibited adjacent to canyons, open space, and the MHPA.
- iv. Landscape lighting shall be limited to low-intensity and low-wattage lights.
- v. Red lights shall be limited to only that necessary for security and safety warning purposes.

Artificial night light from interior lighting shall be minimized through the utilization of automated on/off systems, motion detectors, or similar devices.

The plan contains fire safety and brush management policies; however, it does not clearly require new development to be planned and designed to avoid encroachment into native vegetation for brush management. This is a critical part of preserving natural habitat while maintaining public safety. Please consider the following policies:

Locate, design, and construct new development to provide adequate defensibility and necessary brush management without encroaching into Environmentally Sensitive Lands or native vegetation.

The plan contains many acknowledgments of the scenic views in the planning area, but the policies should be more specific about requirements for the protection of public views. Please consider the addition of policies such as the following:

The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance.

Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas.

Measures to avoid and minimize adverse impacts on scenic areas include, but are not limited to, siting development in the least visible portion of the site, breaking up the mass of new structures, designing structures to blend into the natural setting, restricting building maximum size, reducing maximum height standards, clustering development, minimizing grading, and incorporating landscape elements.

New development in highly scenic areas shall be subordinate to the character of its setting. The design of hillside developments should relate to the existing topography

Ensure visual and physical access to natural canyons, resource areas and scenic vistas.

Under Section 7.0 Public Facilities, Services and Safety Policies on page s183 and 184, please consider the following additional hazards policies:

Siting and design of new shoreline development shall take into account anticipated future changes in sea level, based on the best available scientific information and projections or range of projections of future sea level.

New development shall be planned and located to be safe from hazards and not require protection over its entire lifespan.

Shoreline protective devices shall only be allowed to protect existing structures and when no other feasible alternative exists, and when fully mitigated for all impacts including public access, recreation, and sand supply.

Sea level rise adaptation should be incorporated into redevelopment where appropriate.

The removal or relocation of existing development that is threatened by sea level rise is encouraged.

The use “soft” or “natural” solutions are preferred alternatives for protection of existing endangered structures

A sensitive biological resources map that identifies habitat types and location must be part of the plan. In addition, the following policies will help meet the Coastal Act requirements for the protection of environmentally sensitive habitat and wetlands:

Permitted uses in wetlands shall be limited to those in the Environmentally Sensitive Lands regulations. No development shall encroach into wetlands, floodplains, vernal

pools, and other sensitive resources, and shall maintain a minimum 100-foot buffer from wetlands and sensitive resources per the Environmentally Sensitive Lands regulations, and shall be designed to minimize or avoid adverse effects to the resources.

All lands meeting the definition of ESHA shall be regulated through the ESL regulations. ESHA shall be protected against significant disruption of habitat values, and only uses dependent on such resources shall be allowed within such areas. As part of the ESL review, the required biological assessment shall include a site-specific determination as to whether or not the on-site resources constitute ESHA, as defined herein. If on-site resources are determined to constitute ESHA, prohibit development that is not dependent on those resources and require open space protection or conservation easements as a component of new development. Development adjacent to ESHA and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade those areas, and shall be compatible with the continuance of those habitat and recreation areas. Development adjacent to environmentally sensitive habitat shall minimize impacts to habitat values or sensitive species to the maximum extent feasible. Native vegetation buffer areas shall be provided around ESHA to serve as transitional habitat and provide distance and physical barriers to human intrusion. Buffers shall be of a sufficient size to ensure the biological integrity and preservation of the ESHA they are designed to protect. All buffers around (non-wetland) ESHA shall be a minimum of 100 feet in width, or a lesser width may be approved by the Planning Department and Fire Marshal as addressed in Policy X. However, in no case can the buffer size be reduced to less than 50 feet.

Policy X. In some cases, smaller buffers may be appropriate, when conditions of the site as demonstrated in a site specific biological survey, the nature of the proposed development, etc. show that a smaller buffer would provide adequate protection. In such cases, the California Department of Fish and Wildlife must be consulted and agree that a reduced buffer is appropriate and the City must find that the development could not be feasibly constructed without a reduced buffer. However, in no case shall the buffer be less than 50 feet.

Regarding the proposed land use and zoning changes, we would appreciate it if you could provide Commission staff with a table identifying any changes in the size or location of existing land use/zoning categories in the Coastal Zone, with a narrative of the reasons for the proposed revisions.

Thank you again for the opportunity to review the draft Community Plan, and I apologize that we were not able to get you these comments sooner. We appreciate the City's coordination and collaboration as we work towards our mutual goal of successful coastal resource protection.

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Sincerely,

A handwritten signature in blue ink that reads "Diana Lilly". The signature is written in a cursive, flowing style.

Diana Lilly
Coastal Program Manager

cc: Nora Ives