

**ISSUE:**

Disagreement on whether all slope stabilization devices<sup>1</sup> should be limited in the same way shoreline protection devices<sup>2</sup> are limited.

**COASTAL LAND USE PLAN POLICY REFERENCES:**

5.1-23, 5.1-32, 5.1-33, 5.1-36, and 5.1-37

**BACKGROUND:**

The Coastal Act does not explicitly limit the use of slope stabilization devices, but does explicitly limit when shoreline protection devices can be used (Coastal Act §30235).

**DISCUSSION:**

Shoreline protection devices have a higher potential to impact sand supplies, beach widths, and coastal access and, as such, should be limited in more situations than slope stabilization devices. The proposed *Coastal LUP* policies limit the use of slope stabilization devices on and near coastal bluffs to only those necessary to protect public accessways and existing principal, garage, and secondary habitable structures. However, CCC staff recommends prohibiting the use of slope stabilization devices near coastal bluffs for existing garages and existing secondary habitable structures. City staff do not believe this proposal is appropriate given landowner concerns and the City's other priorities to encourage housing and off-street parking.

City staff understand that one concern of the CCC is that many slope stabilization devices end up becoming shoreline protection devices. For this reason, the proposed *Coastal LUP* includes policies that clearly define shoreline protection device and slope protection device and these policies clarify that if the device would in any way impact or be impacted by marine influences or marine erosion over the life of the structure that it should be considered a shoreline protection device.

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<sup>1</sup> Slope stabilization devices are constructed features (e.g., retaining walls and sheet piles) that are used to stabilize slopes.

<sup>2</sup> Shoreline protection devices are protection devices (e.g., seawalls, rock revetments, and groins) that are subject to, or designed to protect structures from, erosion, flooding, and other impacts of waves and ocean currents.