

CALIFORNIA COASTAL COMMISSION

SAN DIEGO AREA
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 SAN DIEGO, CA 92108-4421
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Th25b

See additional correspondence received.

Filed: 9/17/12
 180th Day: 3/17/13
 Staff: A. Llerandi-SD
 Staff Report: 9/17/12
 Hearing Date: 10/10-12/12

STAFF REPORT: REGULAR CALENDAR

Application No.: 6-12-008

Applicant: California State Parks

Agent: Darren Scott Smith

Location: Silver Strand State Beach Campground, 5000 Highway 75, Coronado, San Diego County (APN No. 615-030-03)

Project Description: Resurface the RV campground with 1 inch of asphalt and restripe parking spots to widen them from 18 feet to 20 feet and standardize spot length to 39.5 feet. – decreasing the total number of spots from 140 to 132. Install in each spot permanent electrical and water hookups for RVs. Increase rates from \$35/night for a regular site to \$50/night and from \$50/night for a premium site to \$65. Construct an approximately 250 foot vegetated dune at northeast corner of the RV lot to screen the highway and the RV lot.

Staff Recommendation: Approval with Conditions

SUMMARY OF STAFF RECOMMENDATION

Staff is recommending approval of this project, with conditions. The project site is the RV campground located on the north end of Silver Strand State Beach, west of Highway 75 and the Silver Strand bikeway, south of Coronado, CA. The project will resurface and restripe

the RV lot, add electrical and water hookups, increase overnight rates by \$15, and build a vegetated dune wall.

The proposed project raises issues of public access and visual resources. Public access issues arise due to the loss of RV spots from the enlargement of each individual spot. Additionally, rate increases have the possible effect of deterring use by members of the public, especially among lower-income segments of the population. Visual resource issues arise due to the vegetated dune wall blocking views of the Pacific Ocean from Highway 75 and the Silver Strand Bikeway (part of the Bayshore Bikeway) that runs parallel to the highway.

Recommended conditions include revised final plans leaving an approximately 40 foot view corridor on the northern boundary of the RV park, requiring the use of native or drought-resistant vegetation on the dune wall, and siting storage and access so as to not interfere with public access.

Commission staff recommends **approval** of coastal development permit application 6-12-008, as conditioned.

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EXHIBITS

Exhibit 1 – Vicinity Map

Exhibit 2 – Aerial of Project Location

I. MOTION AND RESOLUTION

Motion:

*I move that the Commission **approve** Coastal Development Permit No. 6-12-008 pursuant to staff recommendation.*

Staff recommends a **YES** vote. Passage of this motion will result in approval of the permit as conditioned and adoption of the following resolution and findings. The motion passes only by affirmative vote of a majority of the Commissioners present.

Resolution:

The Commission hereby approves a coastal development permit for the proposed development and adopts the findings set forth below on grounds that the development as conditioned will be in conformity with the policies of Chapter 3 of the Coastal Act. Approval of the permit complies with the California Environmental Quality Act because either 1) feasible mitigation measures and/or alternatives have been incorporated to substantially lessen any significant adverse effects of the development on the environment, or 2) there are no further feasible mitigation measures or alternatives that would substantially lessen any significant adverse impacts of the development on the environment.

II. STANDARD CONDITIONS

This permit is granted subject to the following standard conditions:

1. **Notice of Receipt and Acknowledgment.** The permit is not valid and development shall not commence until a copy of the permit, signed by the applicant or authorized agent, acknowledging receipt of the permit and acceptance of the terms and conditions, is returned to the Commission office.
2. **Expiration.** If development has not commenced, the permit will expire two years from the date on which the Commission voted on the application. Development shall be pursued in a diligent manner and completed in a reasonable period of time. Application for extension of the permit must be made prior to the expiration date.
3. **Interpretation.** Any questions of intent or interpretation of any condition will be resolved by the Executive Director of the Commission.
4. **Assignment.** The permit may be assigned to any qualified person, provided assignee files with the Commission an affidavit accepting all terms and conditions of the permit.

5. **Terms and Conditions Run With the Land.** These terms and conditions shall be perpetual, and it is the intention of the Commission and the applicant to bind all future owners and possessors of the subject property to the terms and conditions.

III. SPECIAL CONDITIONS

The permit is subject to the following conditions:

1. **Revised Final Plans.** PRIOR TO THE ISSUANCE OF THIS COASTAL DEVELOPMENT PERMIT, the applicant shall submit to the Executive Director for review and written approval final project plans. Said plans shall be in substantial conformance with the plans submitted by Darren Smith on July 17, 2012, including, but not limited to, the use of native and drought-resistant plants, but shall be revised to incorporate the following:
 - a. The vegetated dune wall shall be revised such that no dune construction shall occur in the northern-most portion of the site so as to leave a 40 foot view corridor as measured from the northern boundary of the RV park southward. Alternatively, the vegetated dune wall shall be deleted from the plans.

The permittee shall undertake the development in accordance with the approved plans. Any proposed changes to the approved plans shall be reported to the Executive Director. No changes to the plans shall occur without a Coastal Commission-approved amendment to this coastal development permit unless the Executive Director determines that no amendment is legally required.

2. **Staging Area/Public Access.** PRIOR TO THE ISSUANCE OF THIS COASTAL DEVELOPMENT PERMIT, the applicant shall submit to the Executive Director for review and written approval detailed plans for the location of staging areas and of access corridors for the construction site(s). The plans shall include, at a minimum, the following:
 - a) No overnight storage of equipment, construction materials, or excavated materials shall occur within public parking spaces, native vegetation areas, or on the public beach. Stockpiles shall be located away from the water, covered at all times and contained with runoff control measures.
 - b) Storage and staging areas shall be located in a manner that has the least impact on vehicular and pedestrian traffic at the Silver Strand State Beach.
 - c) No work shall occur between Memorial Day weekend and Labor Day of any year.
 - d) Staging site(s) shall be removed and/or restored immediately following completion of the development.

The applicant shall undertake the development in accordance with the approved plans. Any proposed changes to the approved plans shall be reported to the Executive Director. No changes to the plans shall occur without a Coastal Commission approved amendment to this coastal development permit unless the Executive Director determines that no amendment is legally required.

3. **Future Permitting Requirement.** This coastal development permit is for restriping the RV parking spaces, increasing overnight rates by \$15, and constructing a vegetated dune wall in the northeast corner of the lot. All other development proposals for the site, including, but not limited to, construction of other structures, shall require review and approval by the Coastal Commission or its successor in interest under an amendment to this coastal development permit or a separate coastal development permit.

IV. FINDINGS AND DECLARATIONS

A. PROJECT DESCRIPTION/HISTORY.

The proposed project is to resurface and restripe the Silver Strand State Beach RV Campground – decreasing the number of parking spots from 140 to 132 - and install permanent electrical and water hookups at each parking spot. Overnight rates will increase from \$35 a night to \$50 a night for regular spots and from \$50 a night to \$65 a night for “premium” spots that front the beach. These fees will be a flat rate, regardless of whether the new hookups are utilized by the camper. An approximately 250 foot vegetated dune wall will be installed along the northeast corner of the RV park in order to shield the RVs from Highway 75 and vice versa. The project site is located on the Silver Strand, a narrow stretch of land separating San Diego Bay in the east from the Pacific Ocean in the west and that connects the City of Coronado in the north to the City of Imperial Beach and the mainland in the south. Silver Strand is bisected by the north-south Highway 75 and the adjoining Silver Strand Bikeway. While Silver Strand State Beach straddles Highway 75 on both sides, the proposed project site is located in the northwest corner of the park, north of the day-use parking lot and south of the U.S. Naval Amphibian Base also located on the Strand.

Existing facilities are located in three major areas. An oceanside parking area features four parking lots with 1,775 spaces (three day-use lots and the subject RV camping spots), three comfort stations, five shade ramadas, five lifeguard stands, one concession building, one lifeguard tower and office, and one contact station. A bayside day-use area has three comfort stations, six shade ramadas, six lifeguard stands, one concession building, 124 picnic tables with ramadas, and a special event (i.e. very large group only) tent campsite. A nonpublic use area contains two maintenance buildings, the corporation yard, and two employee residences with garages.

Silver Strand State Beach provides habitat for shorebirds and gulls, most notably nesting grounds for the endangered Least Tern and Western Snowy Plover. These are concentrated north of the public areas of Silver Strand State Beach, on the grounds of the U.S. Navy Amphibian Base, and thus in areas where public visitors to the area cannot intrude.

The site is within the City of Coronado, which has a certified LCP. However, the project site is an area where the Commission retains permit authority. Thus, the standard of review is Chapter 3 of the Coastal Act, with the certified LCP used as guidance.

B. PUBLIC ACCESS.

The following Coastal Act policies are most pertinent to this issue, and state in part:

Section 30210 of the Coastal Act states:

In carrying out the requirement of Section 4 of Article X of the California Constitution, maximum access, which shall be conspicuously posted, and recreational opportunities shall be provided for all the people consistent

with public safety needs and the need to protect public rights, rights of private property owners, and natural resource areas from overuse.

Section 30211 of the Coastal Act states:

Development shall not interfere with the public's right of access to the sea where acquired through use or legislative authorization, including, but not limited to, the use of dry sand and rocky coastal beaches to the first line of terrestrial vegetation.

Section 30212 of the Coastal Act states, in part:

- (a) *Public access from the nearest public roadway to the shoreline and along the coast shall be provided in new development projects except where: (1) it is inconsistent with public safety, military security needs, or the protection of fragile coastal resources, (2) adequate access exists nearby, or, (3) agriculture would be adversely affected. Dedicated accessway shall not be required to be opened to public use until a public agency or private association agrees to accept responsibility for maintenance and liability of the accessway.*

[...]

- (c) *Nothing in this division shall restrict public access nor shall it excuse the performance of duties and responsibilities of public agencies which are required by Sections 66478.1 to 66478.14, inclusive, of the Government Code and by Section 4 of Article X of the California Constitution.*

Section 30213 of the Coastal Act states, in part:

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

[...]

Section 30604 of the Coastal Act states, in part:

[...]

- (c) *Every coastal development permit issued for any development between the nearest public road and the sea or the shoreline of any body of water located within the coastal zone shall include a specific finding that the development is in conformity with the*

*public access and public recreation policies of Chapter 3
(commencing with Section 30200).*

The subject property is the RV park within the Silver Strand State Beach, located on the Silver Strand, a stretch of land connecting the cities of Coronado to the north and Imperial Beach to the south. The Silver Strand is a long, narrow strip of land and affords simultaneous views of the Pacific Ocean to the west and San Diego Bay to the east. Due to this unique geography, Highway 75 and the Silver Strand Bikeway are popular north-south conduits for the public to view ocean, beach, and coastal wildlife, as well as access these areas for recreational purposes. The RV campground is located on the west side of Highway 75/Silver Strand Bikeway.

The proposed project's restriping of the RV parking spots will decrease the number of overnight RV camping spots from 140 to 132. Additionally, the \$15 rate increase per night (\$35 to \$50 for regular spots and \$50 to \$65 for "premium" spots) will increase the financial burden associated with renting a parking spot at the state park, thus making the spots less affordable and thus potentially affecting public access. However, according to the applicant, this increase will be partly offset by the savings campers experience from not having to run their gas-fired generators while on site, as they will be able to plug in for electricity. Furthermore, while this project will result in higher camping fees, looked at in the greater context of recreational options along the San Diego coast and their costs, the Silver Strand RV lot will still provide one of the more affordable recreational options to the public while simultaneously enhancing the amenities offered and its attractiveness to the public.

Online research of RV camping options available to the public reveals that there is currently only one other state beach in San Diego County that offers camping options similar to what the applicant proposes – San Elijo State Beach. San Elijo State Beach offers "premium" (meaning the parking spots front the beach) spots with permanent hook-ups for \$65 a night. The non-premium parking spots at San Elijo State Beach do not have hook-ups and charge \$50 a night. The applicant's proposal would bring the premium spots at Silver Strand State Beach into alignment with San Elijo State Beach and actually enhance Silver Strand's non-premium offering, as Silver Strand's regular spots would also offer permanent hook-ups for \$50 a night, unlike San Elijo, whose regular spots charge the same price but do not have hook-ups.

In comparison to privately-run recreational options available in San Diego County, the applicant's project is still one of the more affordable options available. For example, Campland on the Bay is a privately run RV campground in San Diego that offers a much wider variety of parking spaces than Silver Strand State Beach. However, Campland charges much higher rates, with off-season rates ranging from \$41-\$300 a night and peak-season rates ranging from \$45-\$400 a night. The Mission Bay RV Resort is another privately run campground also offering a wide variety of types of parking spaces. However, just as with Campland, Mission Bay RV Resort's rates are significantly higher than the applicant's proposed rates, with Mission Bay rates starting at approximately \$50 a night and increasing from there. Finally, the Chula Vista RV Resort & Marina, south of the project site, charges \$58-\$75 a night, depending on the type of site used.

Because the applicant's proposed project will enhance the amenities available to members of the public who utilize the Silver Strand State Beach RV campground (by providing water and electrical hookups) while maintaining it as one of the more affordable options for beach camping in San Diego County, the impacts to public access will be minimized.

Usage data provided by the applicant shows that the RV campground is rarely used at 100% capacity, either during peak season or off-peak season. As such, the loss of eight RV camping spots should not substantially impact public access to the beach or enjoyment of the RV campground. Furthermore, the loss of eight spots will be partially offset by the increase in the dimensions of the remaining 132 spots. Larger spots can accommodate RVs of various sizes used by the public, especially larger RVs which accommodate a greater number of people per RV, thereby potentially increasing the number of people who use each RV site. The applicant has conducted surveys which lead them to believe that the presence of the proposed hookups will make the RV campground more attractive year round and increase overall usage rates by the public.

The resurfacing and restriping of the RV campground and accompanying increasing in nightly fees will have an impact on public access, but that impact will be minimized by the fact that the vast majority of the spots shall remain and be improved upon so as to offer amenities found in many other public campgrounds while still being one of the most affordable options for the public. This makes the subject permit comport with the public access policies found in Chapter 3 of the Coastal Act.

C. BIOLOGICAL RESOURCES

Section 30230 of the Coastal Act states:

Marine resources shall be maintained, enhanced, and where feasible, restored. Uses of the marine environment shall be carried out in a manner that will sustain the biological productivity of coastal waters and that will maintain healthy populations of all species of marine organisms adequate for long-term commercial, recreational, scientific, and educational purposes.

Section 30240 of the Coastal Act states:

- (a) Environmentally sensitive habitat shall be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed in those areas.*
- (b) Development in areas adjacent to environmentally sensitive habitat areas and park 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.*

The proposed project site is located adjacent to recorded nesting grounds of the endangered Least Tern and Western Snowy Plover. The nesting sites are within the borders of the U.S. Navy Amphibian Base to the north of the proposed project site, and thus the public is not able to access them. Furthermore, there is fencing and signage along the northern boundary of the proposed project site informing the public that the land is federal property, that trespassing is prohibited, and that the area is home to sensitive nesting birds.

Currently, RVs parking at the proposed project site must run their generators to produce electricity to power the various appliances used by campers. This produces both noise and emissions that spread into the surrounding environs. With the proposed installation of electrical and water hookups, the RVs would not have to run their generators. This would substantially reduce the ambient noise and emissions produced by the RV lot and lessen the impact on surrounding biological resources.

In addition, the applicant is proposing to install a dune wall along the northern portion of the site to help screen the RVs from views from Highway 75 and other surrounding areas. As proposed, the applicant will vegetate the proposed dune wall with native plants so as to keep with the character of the surrounding beach and to prevent erosion. The vegetation type at Silver Strand State Beach is coastal strand, which is rare in San Diego County. In developed areas of the park, natural vegetation has been displaced by car parking, roads, buildings, ornamental vegetation. The California Department of Fish and Game's Natural Resource Data Base indicates that six rare or endangered plant species occur in or near Silver Strand State Beach.

The proposed site of the vegetated dune wall is currently flat, compacted sand and dirt, with no vegetation present. The proposed vegetated dune wall will improve the aesthetics of the project site and increase the amount of native or drought-resistant vegetation present at the park.

Special Condition No. 1 mitigates the impacts to biological resources by requiring the applicant to adhere to approved site and vegetation plans that only utilize native or drought-resistant vegetation and avoids the use of invasive species.

The potential impacts from introducing vegetation into a State Beach have been minimized by requiring the applicant to utilize native and drought-resistant plants so as to make this permit comport with the biological policies of Chapter 3 of the Coastal Act.

D. VISUAL RESOURCES

Section 30251 of the Act addresses visual resources, and states, in part:

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.

[...]

The project site is a flat parking lot located between Highway 75/Silver Strand Bikeway and the Pacific Ocean. When the RV park is not fully utilized, such as during the off-season, drivers and bikers have some limited views of the ocean across the project site. However, during the peak summer months, the RV lot is utilized at high capacity and no ocean views are really available across the site.

The applicant predicts that the proposed project – namely the installation of electrical and water hook-ups - will make the RV lot more attractive to the public during the off-peak season and increase usage rates during those months. The applicant states that this is because campers have expressed a preference to not have to run their own generators or worry about their water supply. Thus, there will possibly be a greater number of RVs over the course of the year, blocking a greater portion of the ocean view across the RV lot for a greater portion of the year. Furthermore, the proposed vegetated dune wall as proposed would completely block ocean views along its approximately 250 foot length regardless of whether there are RVs parked behind it or not.

The applicant has indicated that due to concerns with views raised by nearby homeowners, they proposed to install the dune wall along the northern portion of the site to help screen the park and RVs from views offsite. As proposed, the dune wall will connect to the natural dune system north of the project site and extend south for approximately 250 lineal feet. Currently, there is an approximately 40-foot wide east-west view corridor located between the paved RV parking spots and the northern fence that separates the project site from the U.S. Navy Amphibian Base. This view corridor currently allows clear, uninterrupted views to the ocean when viewed directly head on and does not get blocked by any RVs. However, as proposed, the vegetated dune wall will block the view corridor along with the RVs parked in the lot.

Again, the main reason for the dune wall is to screen the RV park from off site views, mainly to address concerns raised by nearby residents. However, the proposed vegetated dune wall is not needed to bring the project into compliance with Chapter 3 of the Coastal Act. In fact, because the northern portion blocks an existing, uninterrupted ocean view from the highway, the wall is not consistent with the view protection policies of the Coastal Act. As such, Special Condition No. 1 requires the applicant to revise the project plans to delete the dune wall along the approximately 40 foot view corridor area or delete the dune wall altogether. With the view corridor remaining open, public ocean views will be protected.

The vegetated dune wall as conditioned will minimize anticipated blockages of ocean views across the project site from public roads and ensures that this permit will comport with the view protection policies of Chapter 3 of the Coastal Act.

E. LOCAL COASTAL PLANNING

The project site is located within the City of Coronado. However, while Coronado has a fully certified LCP, the subject site is located in an area of original jurisdiction, where the Commission retains permanent permit authority and Chapter 3 of the Coastal Act remains the legal standard of review. As conditioned, the proposed development is consistent with Chapter 3 of the Coastal Act. Approval of the project, as conditioned, will not prejudice the ability of the City of Coronado to continue to implement its certified LCP.

F. CONSISTENCY WITH THE CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)

The California Department of Parks and Recreation is the lead agency for purposes of CEQA review for this project, and the Coastal Commission is a responsible agency. Section 13096 of the Commission's Code of Regulations requires Commission approval of coastal development permits to be supported by a finding showing the permit, as conditioned, to be consistent with any applicable requirements of the California Environmental Quality Act (CEQA). Section 21080.5(d)(2)(A) of CEQA prohibits a proposed development from being approved if there are feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse effect which the activity may have on the environment.

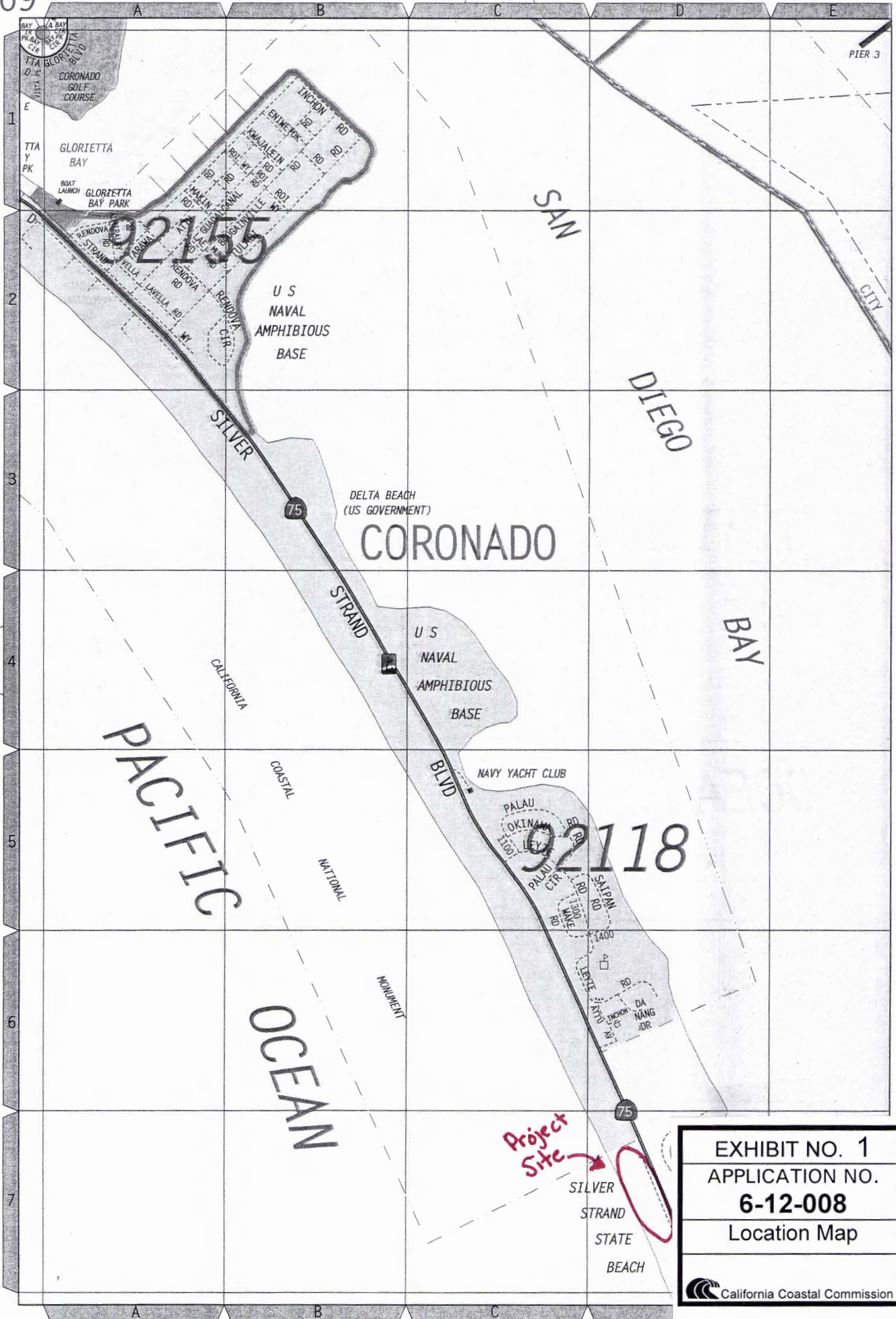
The proposed project has been conditioned in order to be found consistent with the Chapter 3 policies of the Coastal Act. Mitigation measures, including conditions addressing public access and visual resources, will minimize all adverse environmental impacts. As conditioned, there are no feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse impact which the activity may have on the environment. Therefore, the Commission finds that the proposed project is the least environmentally damaging feasible alternative and is consistent with the requirements of the Coastal Act to conform to CEQA.

1309

SEE 1289 MAP

SAN DIEGO CO.

SEE 1308 MAP



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EXHIBIT NO. 1
APPLICATION NO.
6-12-008
Location Map
California Coastal Commission

SEE 1329 MAP



Google earth



EXHIBIT NO. 2
APPLICATION NO.
6-12-008
Aerial View
 California Coastal Commission

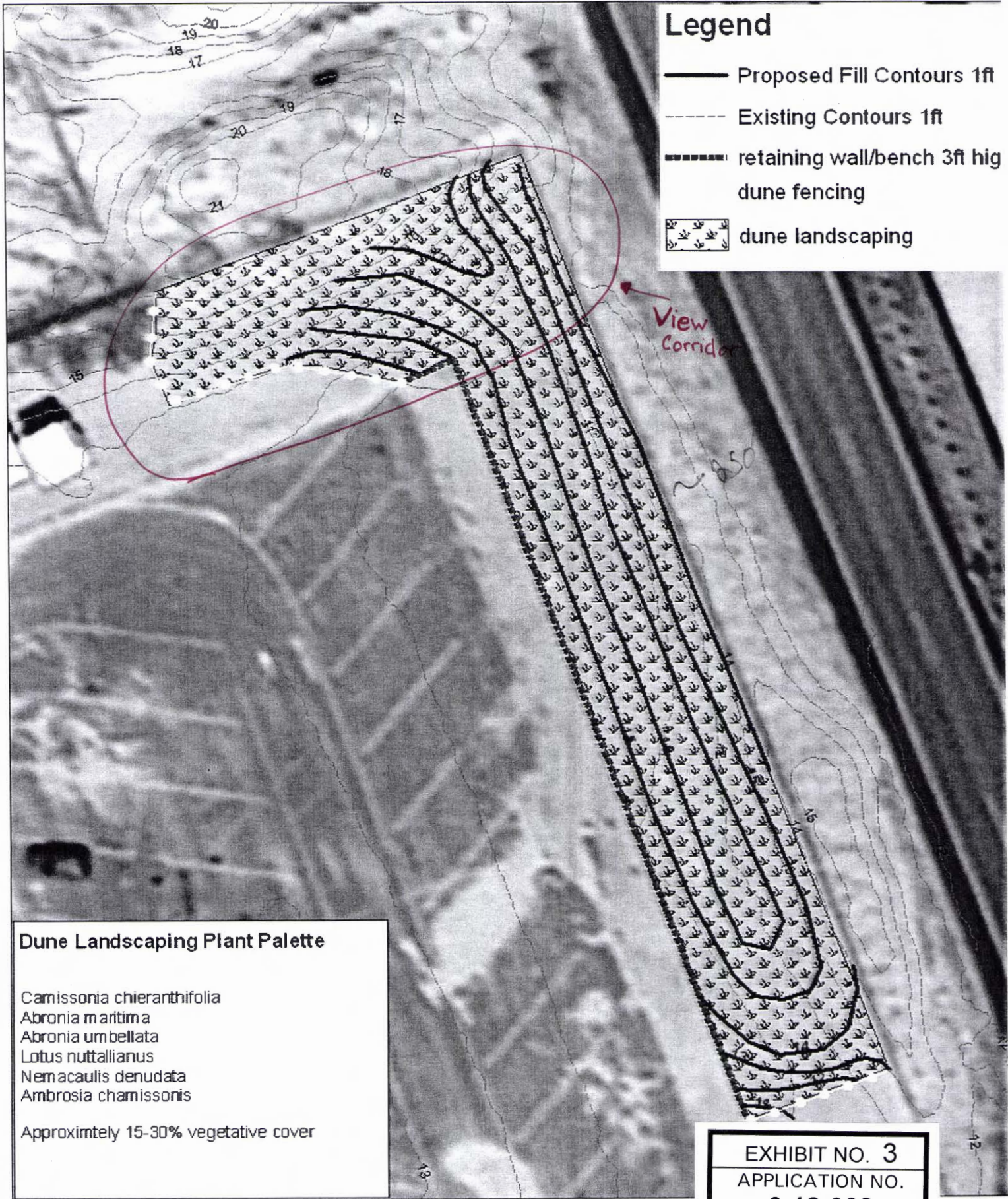


Figure 1. Conceptual Dune-Visual Screen Grading and Planting
 Campsite Hookups Project (CDP#6-12-008)
 Silver Strand State Beach

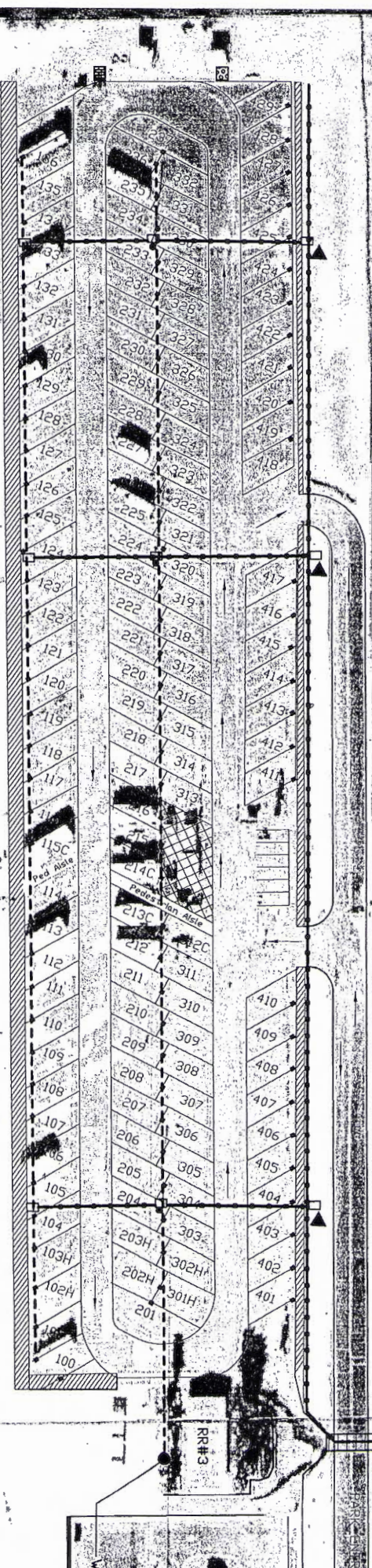
3.755 15'

EXHIBIT NO. 3
APPLICATION NO.
6-12-008
Site Plan
California Coastal Commission



NB. RTE. 75 TO CORONADO

SR. RTE. 75 TO IMPERIAL BEACH



- LEGEND**
- NEW UG UTILITY CORRIDOR
 - - - EXISTING UG UTILITY CORRIDOR (SURFACE RUN)
 - EXISTING UG UTILITY CORRIDOR (SURFACE RUN)
 - EXISTING ELECTRICAL SERVICE EQUIPMENT
 - REPLACE WITH NEW SERVICE EQUIPMENT
 - NEW RV HOOKUP PEDESTAL
 - CAMP-SITE STRIPING AND NUMBER
 - ACCESSIBLE CAMPSITE 22'X40'
 - HOST CAMPSITE
 - EXISTING REMNANT ASPHALT
 - EXISTING CAMP KIOSK OPERATIONS
 - UTILITY POINT OF CONNECTION (POC)
 - ALTERNATE DUMPSTER SITE
 - EXISTING DUMPSTER SITE

SILVER STRAND STATE BEACH CAMPGROUND
RV HOOKUP AND SIZE REVISION SITE PLAN

2-8-12

EXHIBIT NO. 4
APPLICATION NO.
6-12-008
Parking & Utility Plan



EnergyMate®

Small in Size. Big in Features.

The power you need, where you need it.

The EnergyMate® is your simple and economical solution. Its size is ideal for almost any location, and it can really deliver the power with a capacity of 120 amperes. The EnergyMate® can deliver the power right where you need it. And just like its big brother PowerPort®, the EnergyMate® is built to last, featuring extra durable, non-conductive polycarbonate plastic housing. All this and the one-of-a-kind PowerSnap® Panel. Now that's big!

- Comes standard with PowerSnap® Panel.
- Available in combinations of 20, 30 and 50 ampere corrosion-resistant receptacles. Choose from Marine, RV and International styles.
- Corrosion and impact-resistant, non-conductive polycarbonate plastic housing.
- Choose amber or clear lens.

- Downward indirect lighting creates desirable visual interest and minimizes safety and security risks.
- Fine-strand, tin-plated copper wiring — corrosion-resistant.
- Snap latch on cover accepts padlock.
- Choose from a variety of mounting options, including a bracket for mounting to existing structures, a powder-coated aluminum stand, triangular dock locker and many more.
- UL Listed up to 120 amperes.

HyPower's™ technology makes it easy to transform one power package to another, this is really nice when a new boat is coming in. By snapping in a different modular panel into the pedestal, you can customize your customer's electrical power needs.

— Las Vegas Boat Harbor, Bob Gripentog
Las Vegas, Nevada

Featuring the PowerSnap® Panel

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2-3 ft*

*4" deep
14" high
10" wide*



Stand up and double your power.

Accommodates dual or single EnergyMate®.

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EXHIBIT NO. 5

APPLICATION NO.

6-12-008

Hookup Sample

 California Coastal Commission

Th 25b

Agenda No. Th25b

Permit No. 6-12-008

Name: Coronado Cays Homeowners Association

October 4, 2012

California Coastal Commission
San Diego Coast District
7575 Metropolitan Drive, Suite 103
San Diego, CA 92108

FILE COPY

RE: Proposed RV Hook-Ups and price hikes at Silver Strand State Beach

Dear Coastal Commissioners:

Please accept this e-mail in opposition to the Proposed RV Hook-Ups and price hikes at Silver Strand State Beach. I am in total agreement with the letter written by the Coronado Cays Homeowners Association. I would make the additional points.

1. While the project talks about preserving views, there is no mention that the Silver Strand State Park in on a State designated Scenic Highway. This designation requires that all organizations involved with the Scenic Highway actively pursue Corridor Protection. The fantastic part of the Silver Strand is the views, the open spaces, the wildlife, and native plants. We have worked hard to make sure this is not an area for increased development. The proposal before the Commission moves our strategy backward. In no way does it enhance the beauty of this wonderful part of our world.
2. The plans call for a sewage dumping station, either at this time or in the near future. The U.S. Navy has a plan underway to add sixty plus hook-ups to the Fiddler's Cove Marina with attendant disposal of sewage. There is no indication that the City has been contacted and that the current sewage mains can handle such an increase in load.
3. As Ms. Tolles writes in her letter from the Coronado Cays Homeowners Assn., "Finally, we understand that this is the first in a series of projects State Parks will propose in order to develop Silver Strand State Beach into a revenue producing park. " Before this project is approved, we must see the Master Plan for the Silver Strand Park and not review one project at a time. An EIR and Coastal Permit should be sought for the entire upgrade. Coronado has already suffered, "Piecemeal EIR's by the U. S. Navy as they expand operations on the Strand. Please know that each project, either by the Navy or the State Park, degrades the Silver Strand Scenic Highway. I plead, "Do not let this happen! Require a complete Master Plan of all anticipated projects.
4. Finally, the Silver Strand State Park has the biggest eyesore on the Silver Strand. It is the old, dilapidated fence along the ridgeline south of the park entrance. The fence is in disrepair, and as can be seen essentially non functional. This fence is a disgrace but to date, the Regional Director of

Letters of Opposition 31

State Parks, Clay Phillips, has refused to seriously consider improving the situation. The Silver Strand committee has submitted professionally designed drawings that would correct the situation but to no avail.



If the State Park has money to spend on improvements to the RV area, I strongly suggest that they include in their plans removal of this eyesore.

Thank you for your consideration of this matter.

Phil Monroe

Former Coronado City Councilmember 2000 - 2008

C.C.H.O.A.
505 Grand Caribe Isle
Coronado CA 92118



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HOMEOWNERS ASSOCIATION

RECEIVED

OCT 09 2012

CALIFORNIA
COASTAL COMMISSION
SAN DIEGO COAST DISTRICT

Agenda No. Th25b

Permit No. 6-12-008

Name: Coronado Cays Homeowners Association

October 5, 2012

California Coastal Commission
San Diego Coast District
7575 Metropolitan Drive, Suite 103
San Diego, CA 92108

RE: Proposed RV Hook-Ups and price hikes at Silver Strand State Beach

Dear Coastal Commissioners:

The Coronado Cays Homeowners Association urges the Coastal Commission not to approve this project. We are an association of 1200 homes located directly across Highway 75 from Silver Strand State Beach. We became aware of this project earlier this year and discussed our concerns with Lee McEachern at the Commission, memorializing them in a March 19, 2012 letter (copy attached). We met with State Parks officials and with officials for the City of Coronado and discussed our mutual concerns. One of the compromises that came out of those meetings was an agreement by State Parks to lower the height of the hook-ups as much as possible and to increase the size of an existing dune/berm at the north end of the RV parking lot in order to mask the unsightly "forest of thumbs" that would be created by the permanent hook-ups, and that would comprise the first view of this park that the public would see when traveling down Highway 75.

After reviewing the staff report, we urge the Commission **not** to approve this project, as the problems we first raised have not been solved, the staff report contains inaccuracies, it fails to address or seriously underestimates the impacts of this project, and the financial necessity for raising fees at this park, in an area that is under-served by parks and that is home to many families who cannot afford fee hikes, is highly questionable after the discovery of "hidden" millions in the State Parks budget and the recent passage of legislation with additional funding for State Parks.

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Biological Resources

In analyzing this project, the staff report cites two sections of the Coastal Act which deal with public access, Sections 30210 and 30212. These sections state, in pertinent part, "maximum access, . . . and recreational opportunities shall be provided for the people consistent with public safety needs and the need to protect public rights, rights of private property owners, and natural resource areas from overuse . . .," and "[p]ublic access from the nearest public roadway to the shoreline and along the coast shall be provided in new development projects except where: (1) it is inconsistent with . . . the protection of fragile coastal resources." Staff report, pages 7-8.

The staff report also cites Sections 30230 and 30240, which address the protection of biological resources. These sections state, in pertinent part, "[m]arine resources shall be maintained, enhanced, and where feasible, restored. Uses of the marine environment shall be carried out in a manner that will sustain the biological productivity of coastal waters and that will maintain healthy populations of all species of marine organisms . . .," and "[e]nvironmentally sensitive habitat shall be protected against any significant disruption of habitat values, . . ." and finally, "[d]evelopment in areas adjacent to environmentally sensitive habitat areas and park 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." However, because the staff report incorrectly implies that there are no fragile coastal resources within the park, it fails to include any discussion of the impacts of the proposed project on those resources.

The staff report states, that, "Silver Strand State Beach provides habitat for shorebirds and gulls, most notably nesting grounds for the endangered Least Tern and Western Snowy Plover. These are concentrated north of the public areas of Silver Strand State Beach, on the grounds of the U.S. Navy Amphibian (sic) Base, and thus in areas where public visitors to the area cannot intrude." Staff report, page 7. The report further states, "The nesting sites are within the borders of the U.S. Navy Amphibian (sic) Base to the north of the proposed project site, and thus the public is not able to access them." Staff report, page 11. These statements are untrue, as there are extensive protected nesting sites within the boundaries of Silver Strand State Beach.

Every spring nesting season, the entire dunes area in the south half of the park is fenced off in order to protect endangered bird species nests. For the past several years, this fencing has been left in place and now appears to be permanent (Photos 1 and 2, attached). These nesting sites are always accessible to the general public, a fact which State Parks advertises in its brochure entitled, "San Diego Coast State Parks" (available online). The brochure calls the entire southern half of Silver Strand State Beach, the "Silver Strand Natural Preserve," and states, "Silver Strand Natural Preserve, located on the south side of the entrance to Silver Strand State Beach, contains a unique coastal strand plant community that was once found throughout the southern California coast and is now rare. Nesting sites for the California least tern and Western snowy plover are also found here."

In addition to fencing off the dunes in the south part of the state beach, large expanses of the beach on the bay side are fenced off during the spring nesting season as well. New fencing was

also installed on the bay side during the summer as part of a two-year study of endangered plant species that is being conducted by State Parks and SWIA (Southwest Wetlands Interpretive Association) pursuant to a grant from the U.S. Fish and Wildlife Service. The bay side areas that are currently fenced off to facilitate the endangered plant species study are contiguous to the boating center and the large group tent camping site, areas that are always available to the public (Photos 3 and 4, attached).

Because the staff report fails to acknowledge the extent of the existence of endangered plant and animal species present in the park, it omits any discussion of the impacts of this project on those species, and thus fails to provide information critical to the Commission's decision regarding this project. In fact, the staff report appears to note with favor that the larger RV parking spots that would be created by this project will accommodate "larger RVs which accommodate a greater number of people per RV, thereby potentially increasing the number of people who use each RV site." Staff report, page 10. Discussing favorably the prospect of increased park usage without also discussing the impact of that increased usage on the species in the park and on the surrounding neighborhoods makes the report extremely unbalanced and insufficient upon which to base an informed decision. Among other things, the report fails to recognize that the endangered plant and animal species in the park will no longer be able to use the winter and early spring months to recover from the intense usage of this state beach during the summer and fall seasons.

The report also fails to address the impact of increased usage on the surrounding neighborhoods. We are very concerned about increased noise, traffic and trash that would result from maximizing the number of RVs at the beach on a year round basis. This beach is already very heavily used during the summer and there are considerable traffic impacts in the Coronado Cays. Along with day use beachgoers, RV camper users park their extra cars on streets in the Coronado Cays in order to come and go before the State Beach gate opens in the morning and after the gate closes in the evening. State Parks has also indicated that they would like to install a dump station in the RV lot and extend the maximum stay period to 28 days from the current 7 days were this project to be approved. Allowing a 28 day stay would effectively turn this park into a residential trailer park at the beach. Since State Park rules permit the consumption of alcohol inside RVs, the creation of a year round trailer park at the beach with alcohol is highly likely to result in overuse and in significant adverse impacts on the flora, fauna and surrounding neighborhoods.

Visual Impacts

The adverse visual impacts of this project are also significant. However, the staff report reaches the opposite conclusion by failing to address the elements set forth in the statute. The report cites Section 30251 of the Coastal Act which states, in part, "[t]he 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." Staff report, pages 11-12.

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After citing these sections of the Act, the report concludes that, "the installation of electrical and water hook-ups -- will make the RV lot more attractive to the public during the off-peak season and increase usage rates during those months." Staff report, page 12. Surely the report does not mean attractive in a physical, visual sense, as referred to in the Coastal Act, but rather attractive in an economic sense. However, this misstates the intent of the Coastal Act's visual resources provisions.

The first view the public has of this park when driving down the highway or riding down the bike path is of the RV lot (Photo 5, attached). While there is an existing dune that partially blocks the RV lot, the idea behind the expanded dune proposal is to enhance the visual quality in this degraded area by directing the viewer's attention further south to the asphalt parking lots that do not contain RVs and therefore have better ocean views. Moreover, the dune proposal was not "mainly to address concerns raised by nearby residents" (Staff report, page 12), but was designed to upgrade the appearance of this park so that it is more "visually compatible" with its natural setting and with the enhancements that were added by the "Nature's Bridge to Discovery" project along Highway 75 to the north and south of the park pursuant to the TEA-21 Silver Strand Improvement Project (Photo 6, attached).

Approving this permit will result in the creation of a permanent "forest of thumbs" in the RV parking lot that will further degrade the already unattractive views. This is because, unlike the San Elijo State Beach RV hook-ups cited in the staff report that are completely covered by vegetation and are not visible from the road (photo at left, below), the RV hook-ups at Silver Strand will poke up from a large, already unattractive asphalt parking lot (photo at right, below). Thus, this project fails to comply with the visual resources provisions in the Coastal Act.



San Elijo



Silver Strand

Impact of Rate Hikes

A Coastal Act public access provision cited in the staff report, provides, "[l]ower cost visitor and recreational facilities shall be protected, encouraged, and, where feasible, provided." Section 30213, Staff report, page 8. The staff report states that, "[t]he applicant has conducted surveys which lead them to believe that . . . the proposed hookups will . . . increase overall usage rates by the public." Staff report, page 10. We are unaware of any surveys conducted by State Parks that would support this conclusion, and we request that the Commission ask for the data pertaining to any such surveys. Silver Strand State Beach is located in the South Bay Area, an

area that is under-served by parks and that is home to many families who use this park and who cannot afford the proposed fee hikes. For State Parks to propose this project in order to increase revenue from families of modest means in this area, especially after the discovery of a "hidden" \$54 million in their budget, is unconscionable.

Finally, we understand that this is the first in a series of projects State Parks will propose in order to develop Silver Strand State Beach into a revenue producing park. Other projects State Parks personnel have mentioned include the construction of an RV dump station in the middle of the RV parking lot, increasing the maximum stay period from 7 to 28 days, constructing a permanent entertainment event venue pre-wired for sound located at the first palapa on the ocean side of the beach (currently used for the Junior Lifeguards program) and bringing in mobile yurts that could be moved around the park and rented out (our HOA successfully opposed the movable yurts idea several years ago). Allowing this project and others to take place at Silver Strand State Beach would turn this valuable natural resource, and home to endangered plants and bird species, into a kind of Disneyland by the sea and result in the significant, irreversible degradation of the existing natural and endangered resources.

It is for these reasons that we ask the Coastal Commission NOT to approve this project.

Sincerely,

Signature on File ➤

Kim Tolles
President
Coronado Cays Homeowners Association

cc. Clay Phillips
Superintendent, South Sector
San Diego Coast District
California State Parks
4477 Pacific Highway
San Diego, CA 92110

Mayor of Coronado, Council Members and City Staff
City of Coronado
1825 Strand Way
Coronado, CA 92118

Mike McCoy, President
Southwest Wetlands Interpretive Association
PO Box 575
Imperial Beach, CA 91933

Jim Peugh
San Diego Audubon Society
4010 Morena Blvd, Suite #100
San Diego, CA 92117

Andy Yuen
US Fish and Wildlife Service
P.O. Box 2358
Chula Vista, CA 91911

Laura Hunter
Environmental Health Coalition
2727 Hoover Ave., Suite 202
National City, CA 91950



Photo 1 - South half of park



Photo 2 - View of fencing down south half of park



Photo 3 - Plant Study sign

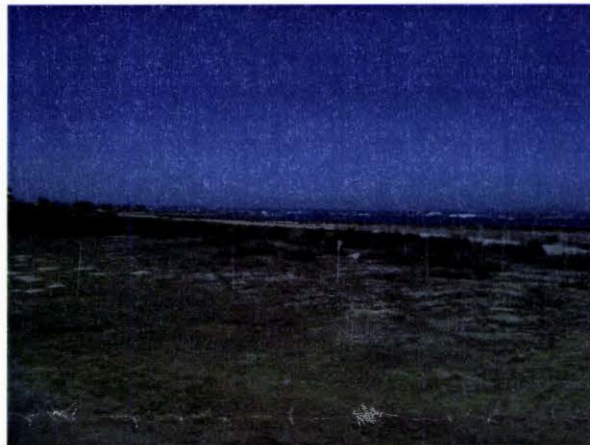


Photo 4 - Bay side of park fenced off for plant study.



Photo 5 - First view of Silver Strand State Beach and RV lot across Highway 75 from the bike path



Photo 6 - Silver Strand Nature's Bridge to Discovery. North of State Beach. Photo by John Durant

Th25b

Llerandi, Alexander@Coastal

From: lizabutler@aol.com
Sent: Friday, October 05, 2012 7:44 PM
To: Llerandi, Alexander@Coastal; imcechem@coastal.ca.gov
Cc: kallantolles@aol.com; PhilMonroe1@aol.com; bking@coronado.ca.us; amccaull@coronado.ca.us
Subject: Fwd: Silver Strand State Beach

Dear Coastal Commission staff,

It appears that I may have used the incorrect address for Alex Lererandi (619-, with whom I spoke this morning. I am very sorry for this error. I will hope that this error will be able to be corrected by this email correspondence. Please let me know if this is not the case.

Best regards,

Liza Butler

FILE COPY

-----Original Message-----

From: lizabutler <lizabutler@aol.com>
To: allemande <allemande@coastal.ca.gov>
Cc: caseytanaka <caseytanaka@coronado.ca.us>; bking <bking@coronado.ca.us>; PhilMonroe1 <PhilMonroe1@aol.com>; kallantolles <kallantolles@aol.com>
Sent: Fri, Oct 5, 2012 4:57 pm
Subject: Silver Strand State Beach

The Coastal Commission
 RE Agenda No.Th25b
 Permit N0 6-12-008
 Proposed hook ups for Silver Strand State Beach

Dear Commissioners:

I am writing in support of the letters from the Coronado Cays HOA and former city councilman Phil Monroe.

As an advocate for the protection and enhancement of open space along the State designated Scenic Highway, I was deeply concerned to read that there was no acknowledgment of the fact that this designation involves more scenic protection and more planning, not less. I will include a part of a letter written to Mr Philips in July, which was not responded to.

"I feel this (the hook up proposal) energy should be incorporated into a more comprehensive planning process for the Silver Strand State Beach. The park has needs which should be designed as a whole rather than piece by piece. A professional master planning process which includes conceptual ideas, plant and paint palettes, material and size of signage, funding sources, identification of built priorities, plant and wildlife priorities and timelines. As major stakeholders and long

time partners, Loews, Cays HOA, the County and City will help expedite this process. They want the park to be "world class", to serve residents, tourists and the inland families of south county with more consistent quality experience. We have a better chance of achieving this goal and better credibility when we plan creatively and cooperatively."

In order to accurately assess the environmental impacts of the state's plans for Silver Strand State Park development, a 'masterplan' should be a condition to the granting of this permit so that the impacted community of stakeholders (CCHOA, Loews, Silver Strand Project and the city of Coronado) can participate in the design and planning process. The State Park exists within the city boundaries and we have partnered together to lend money and labor, obtain county grants for fence designs, facilitate a strong public/ private partnership between Loews and the park, and redesigned the Aquatic Center. In recent years, coastal district management has eschewed cooperative alliances with the community it serves. It has allowed degraded fencing along the sight line of the scenic highway, has allowed degraded interpretive signs to be eye sores for twelve years, and littered the southern beach with degraded dune signs on a hodge-podge of temporary fences which have become permanent. A professional master planning process, for which Coronado is well known, would serve us all--and get us back on track.

The city has been vocal with the navy that the sequential EIRs impacting the Silver Strand do not adequately assess or protect the city's citizens, natural resources and wildlife habitat. The absence of a master plan for the state park would essentially allow a similar abuse to be perpetuated by yet another large government agency operating within city limits yet overriding the city's values and objectives.

This large coastal parcel will be a full RV Lot all year and yet it is being allowed without real mitigating enhancements. This is just hard for me to understand.

Thank you for considering these additional comments.

Liza Butler

Silver Strand Beautification Project-founder
Silver Strand Corridor Management-chair

619-405-1500