

CALIFORNIA COASTAL COMMISSION

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W27a

Filed: 2/24/2012
49th Day: 4/13/2012
Staff: EStevens-SD
Staff Report: 3/22/2012
Hearing Date: 4/11/2012

STAFF REPORT AND RECOMMENDATION ON APPEAL

LOCAL GOVERNMENT: City of Encinitas

[Click here to see additional exhibit submitted by appellant.](#)

DECISION: Approved with Conditions

APPEAL NO.: A-6-ENC-12-010

APPLICANT: City of Encinitas Parks and Recreation Department

PROJECT DESCRIPTION: Demolition of an existing detached 600 sq. ft. concession structure and 864 sq. ft. bathroom structure and associated hardscape. Construction of an attached 2,938 sq. ft. concession, bathroom and storage building, construction of a detached 861 sq. ft. lifeguard garage with a public viewing deck above, a shade structure and an approximately 144 sq. ft. trash enclosure. The project also includes grading, reconfiguration of the lower portion of the access ramp from the upper parking lot to the beach, installation of native vegetation and hardscape improvements throughout the project site, and use of one temporary construction trailer during the construction phase of the project.

PROJECT LOCATION: Moonlight State Beach: 400 C Street, Encinitas (San Diego County) APN 258-042-40 and 258-074-25

APPELLANT: Donna Westbrook

SUMMARY OF STAFF RECOMMENDATION:

The staff recommends that the Commission, after public hearing, determine that no substantial issue exists with respect to the grounds on which the appeal has been filed. Based on review of the City's file and information provided by the applicant, staff has concluded that the development, as approved by the City, is consistent with all applicable LCP provisions as it is in character with the overall surrounding community and will not result in any adverse impacts on public views or public access. Additionally, the proposed development is consistent with allowable uses within the Ecological Resource/Open Space/Park zone and the proposed grading associated with the project has been minimized to the extent feasible and is within the limits defined by the LCP for encroachment in areas of slope greater or equal to 25 percent grade.

Standard of Review: Certified Encinitas LCP and the public access and recreation policies of the Coastal Act.

SUBSTANTIVE FILE DOCUMENTS: Certified City of Encinitas Local Coastal Program (LCP); Resolution No. PC 2012-05; Letters from the City of Encinitas dated 2/15/2012, 2/29/2012, and 3/13/2012; Letters from Christian Wheeler Engineering dated 11/4/2011, 12/5/2011, 1/5/2012, and 2/15/2012; Slope Analysis Exhibit by Pasco Laret Suiter & Associates received 3/5/2012; Trash Enclosure Exhibit received 2/15/2012; Report of Preliminary Geotechnical Investigation by Christian Wheeler Engineering dated 9/27/2011; City of Encinitas Planning Commission Agenda Report for Meeting Date 1/19/2012; Site Plans (17 sheets) received 12/7/2011; Appeal by Donna Westbrook received 2/23/2012 and follow up letter from Donna Westbrook received 2/28/2012; List of Plants to Be Removed During Construction by Marcie Harris Landscape Architecture received 3/15/2012; Letters from Mayor Jerome Stocks and State Parks Director Ruth Coleman received 3/21/2012 (See Exhibit #14)

I. Appellant contends: that the proposed development is inconsistent with the allowed uses within areas designated as Ecological Resource/Open Space/Parks, grading and vegetation removal has not been reduced to the maximum extent feasible in order to minimize erosion and sedimentation, the project results in major cutting of the bluff, analysis of impacts from changes to the helicopter landing pad have not been analyzed, an additional volleyball court will limit general public beach area, CEQA analysis was not done correctly, and that the City did not analyze an alternative that would have a smaller footprint and/or not require grading into the slope (See Exhibit #12).

II. Local Government Action. The Encinitas Planning Commission approved, with conditions, a coastal development permit for the proposed development on 1/19/2012. The conditions of the approval address, in part, the following: analysis of removal or mitigation options in the future if the existing below-grade seawall ever becomes exposed, placement of the trash enclosure structure adjacent to the existing kiosk in the upper parking lot, use of a temporary construction trailer, stormwater quality BMPs related to the treatment of runoff from all new impervious services and for the new trash enclosure structure, emergency access provision during and following project implementation, recommendations for achieving LEED building certification, preservation of existing native vegetation, and prohibition on construction between Memorial Day and Labor Day (See Exhibit #13).

III. Appeal Procedures/Substantial Issue Analysis.

After certification of a Local Coastal Program (LCP), the Coastal Act provides for limited appeals to the Coastal Commission of certain local government actions on coastal development permits.

Section 30604(b)(1) of the Coastal Act states:

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

Coastal Act Section 30625(b) states that the Commission shall hear an appeal unless it determines:

With respect to appeals to the commission after certification of a local coastal program, that no substantial issue exists with respect to the grounds on which an appeal has been filed pursuant to Section 30603.

If the staff recommends "substantial issue" and no Commissioner objects, the Commission will proceed directly to the de novo portion of the hearing on the merits of the project, then, or at a later date. If the staff recommends "no substantial issue" or the Commission decides to hear arguments and vote on the substantial issue question, proponents and opponents will have 3 minutes per side to address whether the appeal raises a substantial issue. It takes a majority of Commissioners present to find that no substantial issue is raised. If substantial issue is found, the Commission will proceed to a full public hearing on the merits of the project then, or at a later date, reviewing the project de novo in accordance with sections 13057-13096 of the Commission's regulations. If the Commission conducts the de novo portion of the hearing on the permit application, the applicable test for the Commission to consider is whether the proposed development is in conformity with the certified Local Coastal Program (LCP).

In addition, for projects located between the sea and the first public road paralleling the sea, Section 30604(c) of the Act requires that a finding must be made by the approving agency, whether the local government or the Coastal Commission on appeal, that the development is in conformity with the public access and public recreation policies of Chapter 3. In other words, in regard to public access questions, the Commission is required to consider not only the certified LCP, but also applicable Chapter 3 policies when reviewing a project on appeal.

The only persons qualified to testify before the Commission at the "substantial issue" stage of the appeal process are the applicant, persons who opposed the application before the local government (or their representatives), and the local government. Testimony from other persons must be submitted in writing. At the time of the de novo portion of the hearing, any person may testify.

The term "substantial issue" is not defined in the Coastal Act or its implementing regulations. The Commission's regulations indicate simply that the Commission will hear an appeal unless it "finds that the appeal raises no significant question as to conformity with the certified local coastal program" or, if applicable, the public access and public recreation policies of Chapter 3 of the Coastal Act (Cal. Code Regs. titl. 14 section 13155(b)). In previous decisions on appeals, the Commission has been guided by the following factors:

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

Even when the Commission chooses not to hear an appeal, appellants nevertheless may obtain judicial review of the local government's coastal permit decision by filing petition for a writ of mandate pursuant to the Code of Civil Procedure, section 1094.5.

In this case, for the reasons discussed further below, the Commission exercises its discretion and determines that the development approved by the City does not raise a substantial issue with regard to the appellants' contentions regarding coastal resources.

IV. Staff Recommendation On Substantial Issue.

The staff recommends the Commission adopt the following resolution:

MOTION: *I move that the Commission determine that Appeal No. A-6-ENC-12-010 raises NO substantial issue with respect to the grounds on which the appeal has been filed under § 30603 of the Coastal Act.*

STAFF RECOMMENDATION OF NO SUBSTANTIAL ISSUE:

Staff recommends a **YES** vote. Passage of this motion will result in a finding of No Substantial Issue and adoption of the following resolution and findings. If the Commission finds No Substantial Issue, the Commission will not hear the application de

novo and the local action will become final and effective. The motion passes only by an affirmative vote by a majority of the Commissioners present.

RESOLUTION TO FIND NO SUBSTANTIAL ISSUE:

The Commission finds that Appeal No. *A-6-ENC-12-010* does not present a substantial issue with respect to the grounds on which the appeal has been filed under § 30603 of the Coastal Act regarding consistency with the certified Local Coastal Plan and/or the public access and recreation policies of the Coastal Act.

V. Findings and Declarations.

The Commission finds and declares as follows:

1. Project Description/History. The proposed project is located at Moonlight State Beach at the west end of Encinitas Boulevard in Encinitas (See Exhibit #1). According to the Department of Parks and Recreation document titled “San Diego Coastal State Park System General Plan: Leucadia State Beach,” the first concession at Moonlight State Beach was developed in the 1920s. From 1949 and 1961 the State Park System acquired the Moonlight property from private ownership and in the late 1960s, the Department of Parks and Recreation redeveloped the property by removing the previous structures and constructing the existing concession and bathroom structures.

In addition to the concession and bathroom structures, the site has a number of other existing site improvements: 15 public parking spaces are located at the terminus of C Street, a 485 sq. ft. lifeguard tower is located on the beach just west of the terminus of C Street, and a public overlook is located on the bluff top to the south of the terminus of C Street. A 190 space public upper parking lot, a helipad, and a small guard kiosk is bordered by C Street and Third Street. A pedestrian access ramp leads from the upper parking lot down a substantial slope to the beach recreation area. Adjacent to the north of the upper parking lot is a tennis court and small creek. B Street is just to the north of the creek and ends at the beach recreational area. In addition, the site has a playground, sand volleyball courts, fire rings, and picnic tables. Finally, there is an existing below-grade seawall at the far inland extent of the beach that may have been installed prior to the effective date of the Coastal Act; no change to the seawall is proposed with this project (See Exhibit #2). Moonlight State Beach is surrounded by residential and commercial development and serves over 1.5 million annual visitors and is the primary beach park for the City of Encinitas.

The proposed project involves the demolition of an existing detached 600 sq. ft. concession structure and demolition of the existing 864 sq. ft. bathroom structure and associated hardscape. The project also proposes to construct one 2,938 sq. ft., 21.5 ft. high building that will house a new concession, bathrooms and storage area. Additionally, a new 861 sq. ft., 13 ft. high garage with a public viewing deck above is proposed for storage of the lifeguard emergency vehicle fleet and other lifeguard related

supplies. The project also includes construction of a 16 ft. high open-sided shade structure covering an approximately 350 sq. ft. area adjacent to the proposed bathroom/concession building and an approximately 9 ft. high, 144 sq. ft. trash enclosure. Finally, the project proposes limited grading of steep slopes, reconfiguration of the lower portion of the access ramp which leads from the upper parking lot to the beach, installation of native landscaping and hardscape improvements throughout the project site, and use of one temporary construction trailer during the construction phase of the project (See Exhibit Nos. 3-7).

2. Protection of Coastal Bluffs and Hillside/Inland Bluffs. The certified LCP contains provisions for protection of Coastal Bluffs, Hillside/Inland Bluffs, and Steep Slopes and states, in part:

Page LU-50 of the certified LUP states, in part:

Coastal Bluffs: The coastal bluffs are part of the dynamic land-ocean interface that is continually changing. Changes in the patterns of weather, severe storms, and even manmade factors can accelerate the weathering processes that affect the coastline. In recent years, a number of homes and other improvements have been damaged due to bluff failure and there is no indication that these bluffs will become inactive in the near future. For this reason, future intensification of development near the bluff edges is discouraged under the land use policy.

Hillside/Inland Bluffs: Topography in portions of the Planning Area contain slopes that may be too steep to readily accommodate development. The potential for slope failure and landslides is often high due to grading practices prior to construction and overwatering after hillside developments have been completed. In addition, many hillside areas may fail during an earthquake. Many of these areas with slopes exceeding 25% are located adjacent to the streams that cross the City and form linear bands of open space that generally parallel the streams...

Public Safety Policy 1.2 of the LUP states, in part:

Restrict development in those areas where slope exceeds 25% as specified in the Hillside/Inland Bluff overlay zone regulations of the zoning code. Encroachment into slopes as detailed in the Hillside/Inland Bluff overlay may range from 0 percent to a maximum of 20 percent, based on a sliding scale of encroachment allowances reflective of the amount of the property within steep slopes, upon the discretionary judgment that there is no feasible alternative siting or design which eliminates or substantially reduces the need for such encroachment, and it is found that the bulk and scale of the proposed structure has been minimized to the greatest extent feasible and such encroachment is necessary for minimum site development and that the maximum contiguous area of sensitive slopes shall be preserved. Within the Coastal Zone and for the purposes of this section, "encroachment" shall constitute any activity which

involves grading, construction, placement of structures or materials, paving, removal of native vegetation including clear-cutting for brush managing purposes, or other operations which would render the area incapable of supporting native vegetation or being used as wildlife habitat...

Page RM-26 of the certified LUP states, in part:

GOAL 14: The City shall stringently control erosion and sedimentation from land use and development to avoid environmental degradation of lagoons and other sensitive biological habitat, preserve public resources and avoid the costs of dealing with repair and sedimentation removal.

POLICY 14.1: The best strategy to reduce erosion and sedimentation is to reduce to the maximum extent feasible, grading and removal of vegetation. It is the policy of the City that, in any land use and development, grading and vegetation removal shall be limited to the minimum necessary.

Section 30.34.020.B of the Certified IP states, in part:

2. With the following exceptions, no structure, facility, improvement or activity shall be allowed on the face or at the base of a coastal bluff.
 - a. Public beach access facilities, as reviewed and approved pursuant to paragraph C “Development Processing and Approval” below.
 - b. Preemptive measures, as defined, justified and approved pursuant to paragraph C “Development Processing and Approval” below.
 - c. Landscape maintenance, as provided by paragraph 3 of this paragraph Section 30.34.020(B)3 of this Code.

The appellant contends that the project results in major cutting of the bluff, that grading and vegetation removal has not been reduced to the maximum extent feasible in order to minimize erosion and sedimentation, and that the City did not analyze an alternative that would have had a smaller footprint and/or not require grading of the slope. As noted above, the proposed project includes the construction of two new buildings partially set into the slope to limit encroachment on the beach. Thus, grading of the slope is proposed. However, the Commission geologist has reviewed the project plans and visited the site and has determined that the locations where grading is taking place in order to site the two new buildings and to realign the access path is not a coastal bluff as defined by the City of Encinitas LCP or the Coastal Act. Instead, he has determined that the grading will take place on a bluff (inland). The LCP defines a bluff as “...a scarp, or steep face of rock, decomposed rock, sediment or soil resulting from erosion, faulting, folding, filling, or excavation of the land mass...” While the LCP defines a Coastal Bluff as “...a bluff whose vertical elevation is ten feet or more, and whose toe is or may be subject to marine erosion.”

The topography of Moonlight State Beach is such that there is a steep rise between intertidal areas of the beach and a relatively flat 'shelf' area that encompasses the majority of the recreational space. The subject bluff where the structures are proposed rises from this flat 'shelf' area, and thus is not often subject to marine erosion. Nevertheless, it may be subject to marine erosion during extreme storm events. For further guidance, one can refer to the Commission's Code of Regulations, which provides additional parameters to differentiate a Bluff (inland or canyon) from a Coastal Bluff. Section 13577(h)(2) of the Regulations state that "...The termini of the bluff line, or edge along the seaward face of the bluff, shall be defined as a point reached by bisecting the angle formed by a line coinciding with the general trend of the bluff line along the seaward face of the bluff, and a line coinciding with the general trend of the bluff line along the inland facing portion of the bluff. Five hundred feet shall be the minimum length of bluff line or edge to be used in making these determinations."

Exhibit #8 illustrates the locations of the proposed grading on the bluff (inland). As shown in the exhibit, the bluff proposed for grading is landward of the general trend/seaward edge of the coastal bluff line. Again, based on this and the definition of bluff in the LCP, the Commission's Staff Geologist has determined that the area to be graded is not a coastal bluff, but instead is a bluff (inland) subject to the provisions of the Hillside/Inland Bluff Overlay.

As specified in the certified LCP, a limited amount of grading of slopes equal to or in excess of 25% grade is permitted on a slope within the Hillside/Inland Bluff Overlay Zone when it has been determined that no other feasible alternative exists and that any permitted grading be minimized to the extent feasible. In this particular case, a maximum encroachment of 10% in areas of slope greater or equal to 25% could be permitted.

A slope analysis completed by the applicant shows that 1.49 acres of the 13.72 acre site are defined as steep slopes (See Exhibit #9). The project as proposed will result in encroachment of approximately 2% of the entire project area with slopes greater than 25% (~0.03 acre of the 1.49 acres consisting of slopes greater than 25% will be affected), which is consistent with the Hillside/Inland Bluff policies of the LCP. The vast majority of the encroachment will result from realignment of the lower portion of the existing pedestrian access path which connects the upper parking lot to the recreation area, while the grading of steep slopes necessary for the northwest corner of the proposed concession/restroom building is responsible for the remainder of the encroachment into steep slopes. The realignment of the access path is necessary, because the proposed concession/restroom building is sited where the lower portion of the access path currently exists. The grading associated with the proposed lifeguard garage is entirely within a portion of the slope that has a grade of less than 25%. Additional grading was previously planned to accommodate the proposed location of trash enclosure within the slope on the southern side of the western terminus of C Street; however, the approved location of the trash enclosure is now adjacent to the upper parking lot directly west of the existing guard kiosk and no grading will be needed (See Exhibit #10).

While the proposed concession, bathroom and storage structure could have been constructed without the need for grading by placing them on the flat 'shelf' of the recreation area, they were cut into the slope in order to reduce potential public view impacts of the coast and to maximize recreational beach area available to the public. The proposed location of the structures will allow for an additional 1,847 sq. ft. of sand area available for public recreation versus what currently exists. Additionally, the applicant has stated that the proposed buildings are the minimal size necessary in order to serve current and projected future recreational and safety needs for the site. The City states that Moonlight State Beach serves approximately 1.5 million visitors a year and approximately 1,900 children utilize the summer youth programs annually. A 2006 assessment found that the existing facilities, which are over 50 years old, are not adequate to serve the current and projected number of public visitors to the beach area each year.

The majority of vegetation removal associated with this project will occur as a result of the re-alignment of the lower portion of the pedestrian access ramp and the construction of the restroom/concession building. The vegetation that will be removed consists of ice plant and annual grass. Two large Laurel Sumac shrubs are proposed to be retained directly above the planned re-alignment of the access path. In addition, specific conditions of the City's approval require that all efforts be made to avoid any impacts to existing native vegetations on the slope and that any native vegetation impacted during construction be replaced on site with the same species or another type of native species appropriate for the area. Finally, an area of approximately 11,586 sq. ft. will be planted with native vegetation (See Exhibit #11). Therefore, vegetation removal has been reduced to the maximum extent feasible and project will result in a much larger area of native vegetation.

The concession portion of the proposed building will be 789 sq. ft., which is 189 sq. ft. larger than the existing concession stand. Currently the concessionaire brings in a small trailer each morning and parks it adjacent to the concession building for additional storage. The restroom portion of the proposed building will be 921 sq. ft., which is only 57 sq. ft. larger than the current restrooms. In addition to the concession and restroom areas, the new building will have 1,228 sq. ft. of new storage and utility/pipe chase area. Currently, the City Parks and Recreation Department places an intermittent/temporary 250 sq. ft. storage container adjacent to the existing restroom during the summer months for storage of equipment and supplies necessary to serve the summer 'Surf Camp' and 'Beach Kids Camp,' which serves approximately 600 youth per summer. Additionally, a intermittent/temporary 300 sq. ft. storage container is placed adjacent to the existing concession structure during the summer for storage related to the 'Youth Lifeguards' program, which serves approximately 1,300 youth per summer. In addition to the storage containers/trailer used for concessions and youth program related storage, the existing maintenance/'pipe chase' area and the upper parking lot guard kiosk are currently used for storage of maintenance supplies/equipment, which is not the intended purpose of these areas. The proposed structure will accommodate storage for the lifeguard operations, youth programs, the concession, and maintenance supplies/equipment. With the storage provided by the proposed building, the City will no longer place storage containers on the site during the summer months, the concessionaire will no longer park

the storage trailer on the site, the maintenance/'pipe chase' areas will be left open for needed maintenance, and the upper parking lot guard kiosk will be available for its intended purpose.

The proposed 861 sq. ft. lifeguard garage will be used to store lifeguard supplies and its rescue fleet, which includes an ATV, a wave runner, a trailer, and one vehicle. The rescue fleet is currently stored at a fire station located 3.5 miles from Moonlight State Beach and brought down on a daily basis and stored on the beach to be used on the site. The City has stated that this equipment cannot be stored outside overnight due to vandalism concerns and deterioration from the weather. Additionally, it is important to have the fleet at the beach at all times to facilitate rapid response to emergency situations. The garage is sited in close proximity to the existing 485 sq. ft. lifeguard tower, which is located just seaward on the beach. The applicant states that it plans to apply for a permit in the future to rebuild the existing lifeguard tower (the proposed lifeguard tower was not submitted as part of this project due to financial constraints). Although building plans are not available at this time for the future lifeguard tower, the city has indicated that it will be located slightly landward of the existing lifeguard tower and will be operationally connected to the proposed lifeguard garage. The majority of the storage needed for current and future lifeguard operations will be contained within the proposed lifeguard garage and the proposed restroom/concession building, which will allow the future reconstructed lifeguard tower to minimize its size and footprint on the beach.

The proposed project has reduced grading and vegetation removal to the maximum extent feasible. While the proposed concession, restroom and storage building will be larger than currently exists, the City has documented that the proposed size meets the needs of the City to serve the public and will result in the elimination of various temporary/portable structures brought on to the beach each year. In addition, the proposed structures have the minimum footprint on the beach necessary to adequately serve current and future public safety and recreation needs. Therefore, based on the above findings, the project, as approved by the City, is consistent with the certified LCP. Thus, the project does not raise a significant issue on the grounds raised by the appellants.

3. CEQA. The appellant contends that the City's CEQA findings for this project are incorrect. Specifically, the appellant contends that the City acted in error to exempt the project and should have conducted an environmental impacts study. However, the standard of review for this project is the City's certified LCP and the public access and recreation policies of the Coastal Act, not CEQA. Thus, this contention does not raise a substantial issue.

4. Permitted Uses. Page LU-38 and LU-39 of the City's certified LUP state the following in relation to property zoned as Ecological Resource/Open Space/Parks:

This land use designation includes all land that has been permanently set aside for the public's use or for the preservation of areas deemed ecologically significant. Much of this land within this category is within the public domain. Some limited

private uses, ancillary commercial uses, which serve a public recreation related need may be allowed. This category includes public parks (both County, City and State operated), the beaches, wilderness preserves, San Elijo Lagoon, the major SDGE transmission corridors, and land that will remain undeveloped due to the presence of severe constraints or significant ecological resources that are owned or controlled by public agencies. In coastal zone ecological resource areas designated Ecological Resource/Open Space/ Parks, no private or commercial uses shall be permitted, except for small concessions in conjunction with existing or permitted interpretive and/or nature centers, aquacultural operations and restoration projects.

The appellant contends that the proposed development is inconsistent with the allowed uses within areas designated as Ecological Resource/Open Space/Parks. The project area is a state beach (although it is currently leased to the City), which is why it is zoned as Ecological Resource/Open Space/Parks. As cited above, under the designation, some “limited private uses, ancillary commercial uses, which serve a public recreation related need may be allowed.” As the concession is serve a public recreation related need, the 789 sq. ft. concession structure proposed with this project is consistent with the policies of the certified LUP. Therefore, the project does not raise a significant issue on the grounds raised by the appellants.

5. Public Access. The project site is located between the sea and the first public roadway. A public access finding must be made that such development is in conformity with the public access and public recreation policies of the Coastal Act.

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.

In addition, Section 30212 of the Act is applicable and 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....

In addition, Section 30221 of the Act is states:

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.

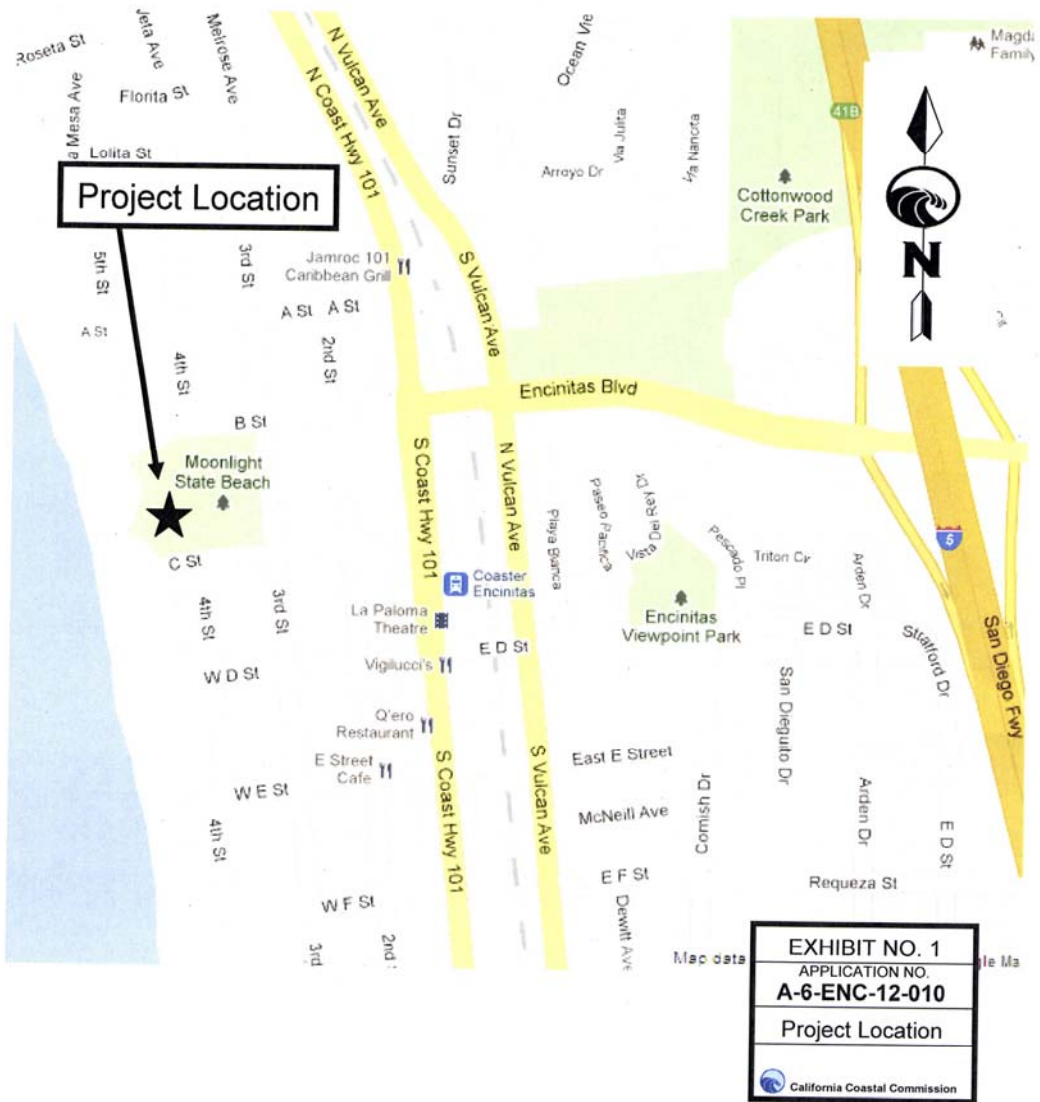
The appellant contends that analysis of impacts from changes to the helicopter landing pad have not been analyzed and that an additional volleyball court is planned and will limit general public beach area. The only change proposed for the existing helicopter landing pad is the addition of a small ramp between the parking lot grade and the grade of the pad (less than 1 ft. in height). There is no proposed change in intensity of use of the helicopter landing pad with this project and no analysis was warranted.

In regards to the appellant's assertion that a new volleyball court will be provided, the City states that is not the case and there will be no change to the existing number of volleyball courts. The entirety of Moonlight State Beach is devoted to public recreation and public safety. The project as proposed will increase the availability of public recreation through the removal of hardscape, construction of an approximately 860 sq. ft. public view deck on top of the proposed lifeguard garage, and the provision of improved concession, restroom, and safety facilities. The development as conditioned by the City will not adversely affect public access to the shoreline. Therefore, the proposed development is consistent with the certified LCP and the public access and recreation policies of the Coastal Act.

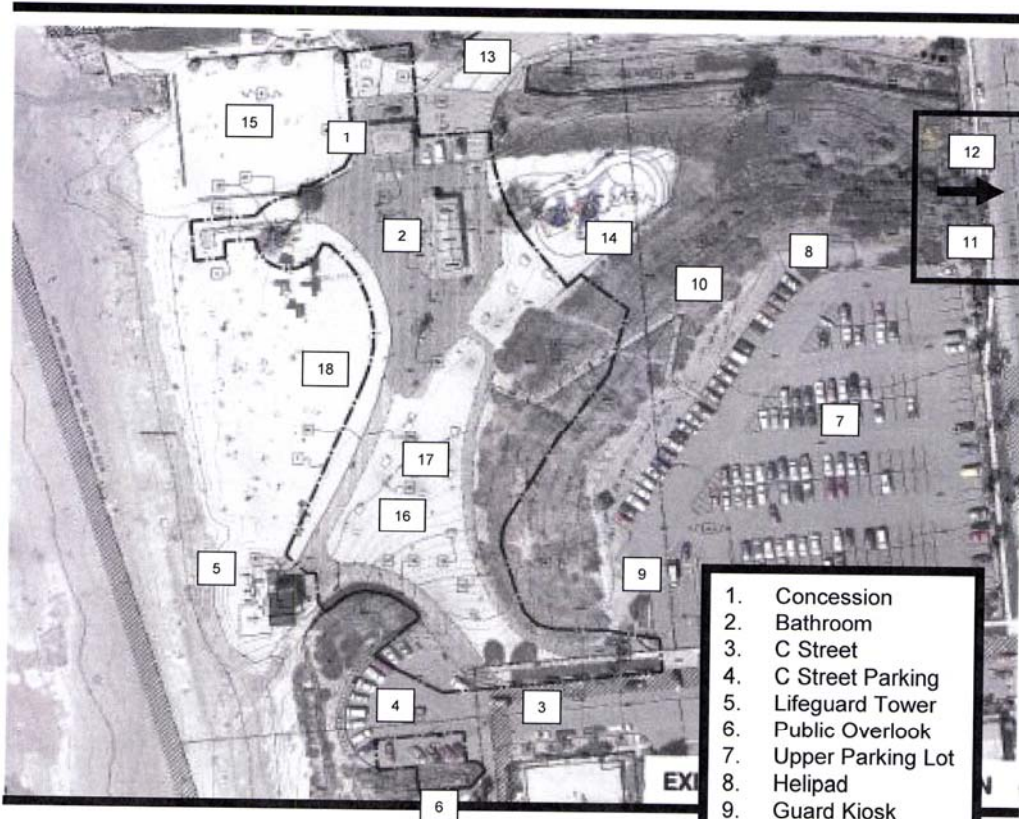
6. Conclusion. Based upon a review of all of the information provided to the Commission regarding this project, the Commission finds that the proposed development is compatible in design and scale with the overall character of the surrounding area and meets the requirements of the certified LCP as it has been documented to be the minimum necessary to provide for adequate public recreation use. The subject development is therefore found to be consistent with the certified LCP. Therefore, the Commission finds that the appeal does not raise a substantial issue regarding the proposed development's conformity with the certified LCP or the public access and recreation policies of the Coastal Act.

7. Substantial Issue Factors. As discussed above, there is strong factual and legal support for the City's determination that the proposed development is consistent with the certified LCP. The other factors that the Commission normally considers when evaluating whether a local government's action raises a substantial issue also support a finding of no substantial issue. The project will not create an adverse precedent for interpretation of the City's LCP. Finally, the objections to the project suggested by the appellant do not raise any substantial issues of regional or statewide significance.

PROJECT LOCATION



EXISTING SITE IMPROVEMENTS

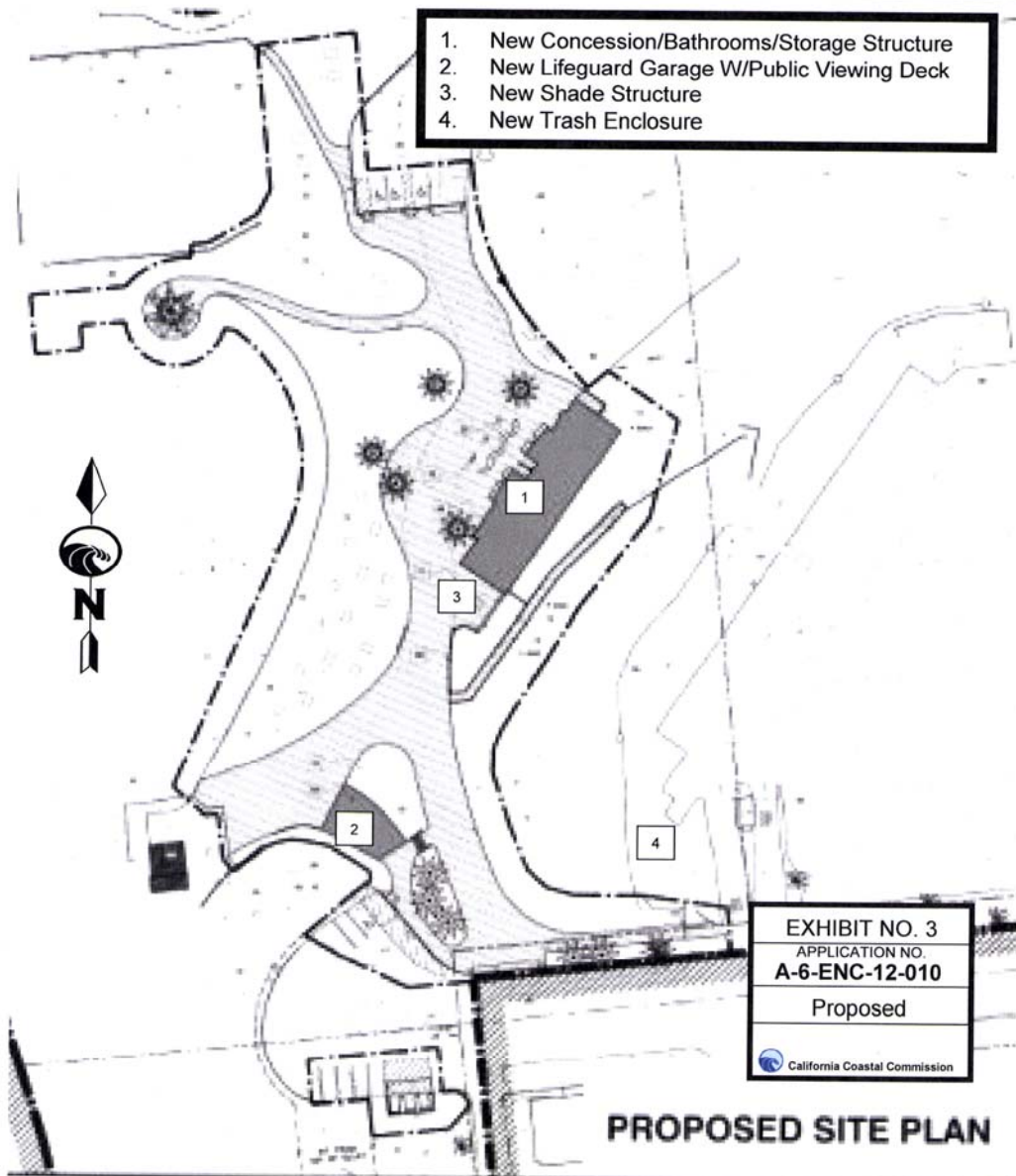


- 1. Concession
- 2. Bathroom
- 3. C Street
- 4. C Street Parking
- 5. Lifeguard Tower
- 6. Public Overlook
- 7. Upper Parking Lot
- 8. Helipad
- 9. Guard Kiosk
- 10. Pedestrian Ramp
- 11. Tennis Court
- 12. Cottonwood Creek
- 13. B Street
- 14. Playground
- 15. Volleyball Courts
- 16. Fire Rings
- 17. Picnic Tables
- 18. Seawall

EXHIBIT NO. 2
APPLICATION NO.
A-6-ENC-12-010
Existing
California Coastal Commission



PROPOSED IMPROVEMENTS



PROPOSED RESTROOMS AND CONCESSION



FLOOR PLAN
SCALE 1/8" = 1'-0"



VIEW FROM NORTHWEST



VIEW FROM SOUTHWEST



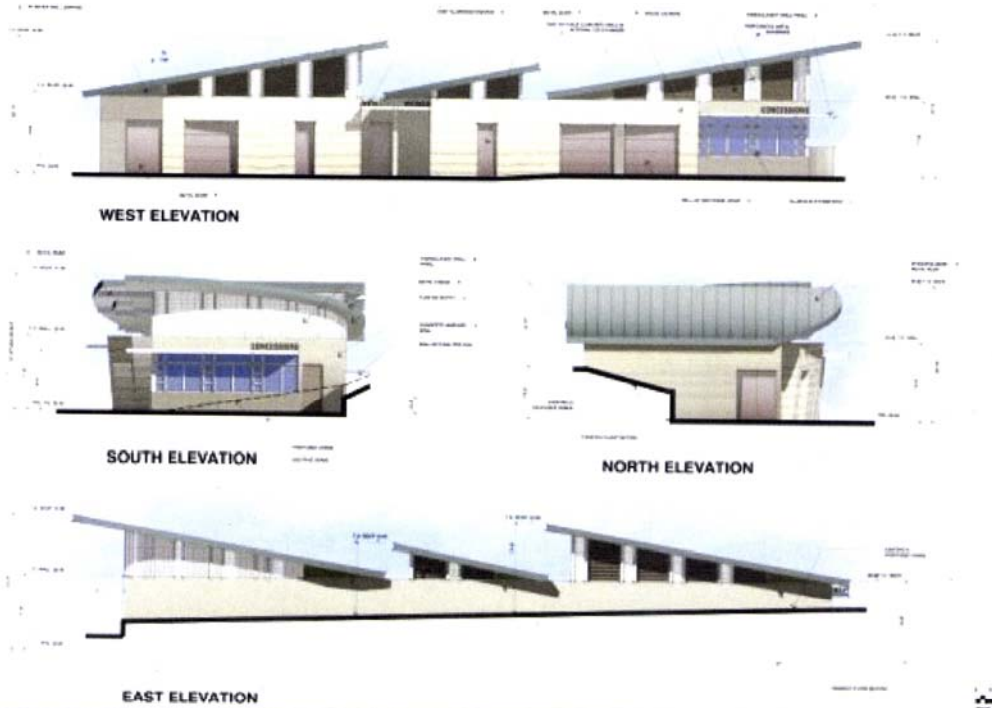
STEPHEN DALTON ARCHITECTS
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Santa Monica, California 90401
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DECEMBER 6, 2011

Moonlight State Beach Improvements
RESTROOMS & CONCESSION

EXHIBIT NO. 4
APPLICATION NO.
A-6-ENC-12-010
Concession/Restrooms
 California Coastal Commission

PROPOSED RESTROOMS AND CONCESSION, CONT.



STEPHEN DALTON ARCHITECTS
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DECEMBER 2, 2011

**Moonlight State Beach Improvements
RESTROOMS & CONCESSION**

EXHIBIT NO. 5
APPLICATION NO. A-6-ENC-12-010
Concession/Restrooms
 California Coastal Commission

PROPOSED LIFEGUARD GARAGE

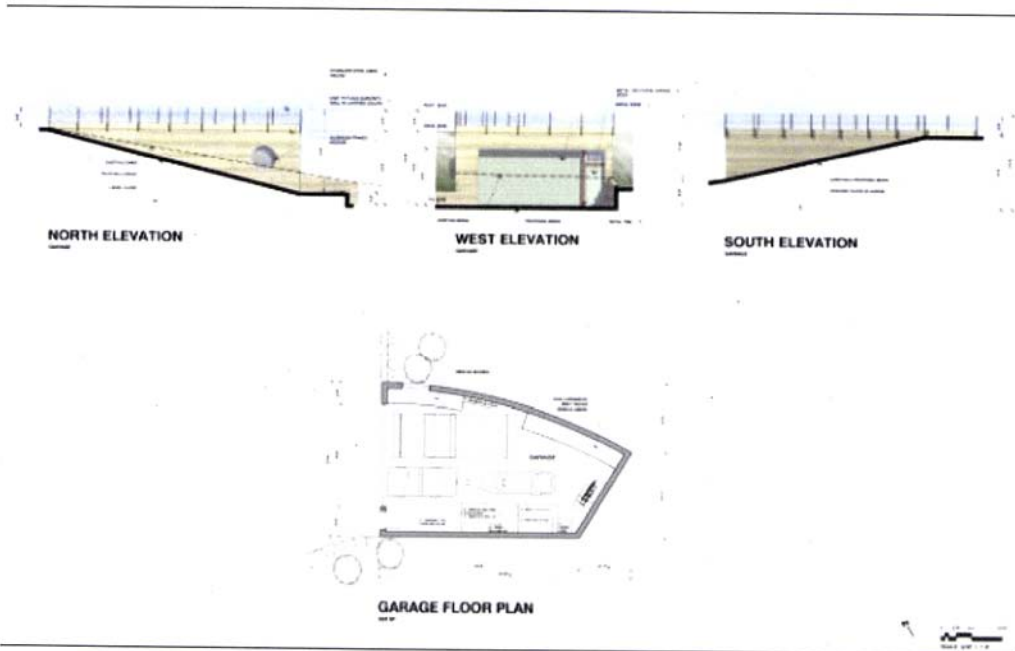
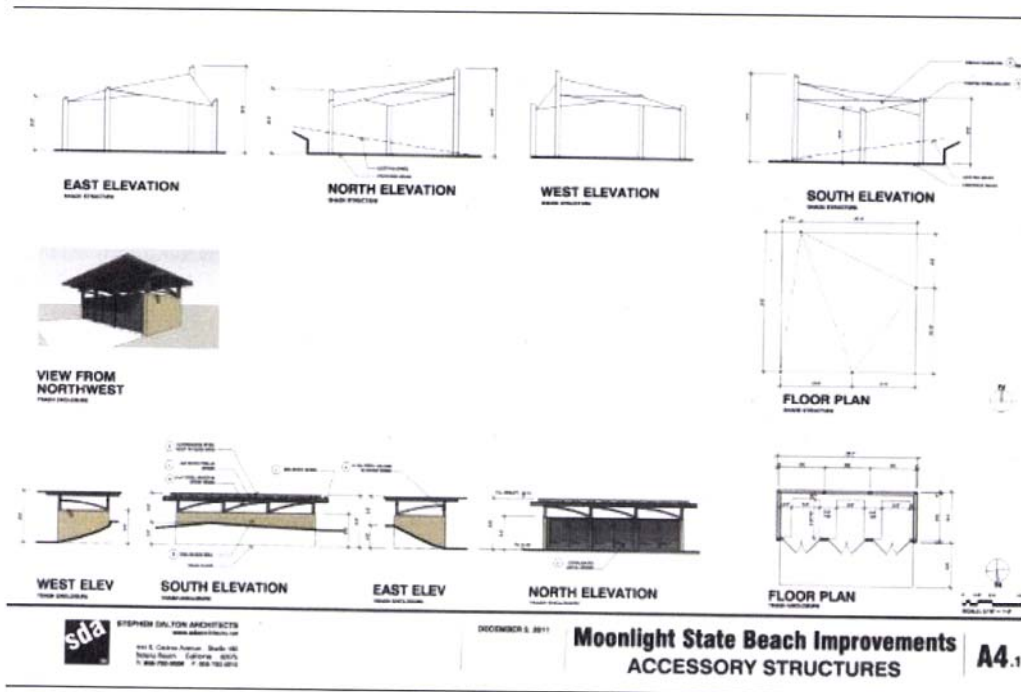


EXHIBIT NO. 6
APPLICATION NO.
A-6-ENC-12-010
Garage
 California Coastal Commission

SHADE AND TRASH STRUCTURES



sda STEPHEN DALY ARCHITECTS
1001 E. Castro Avenue, Suite 100
Marina del Rey, California 90292
P: 310-305-8888 F: 310-305-8812

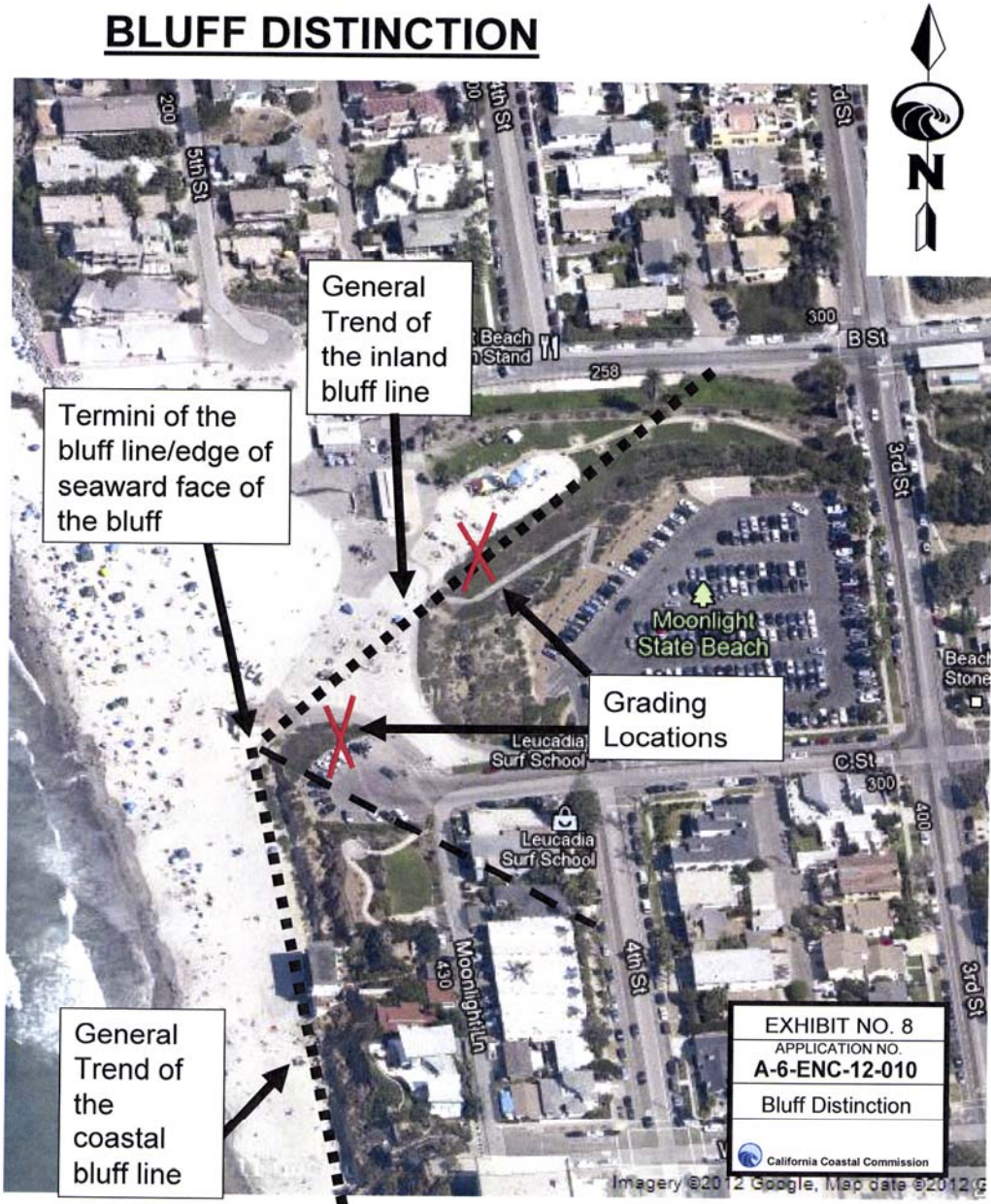
DECEMBER 3, 2011

Moonlight State Beach Improvements
ACCESSORY STRUCTURES

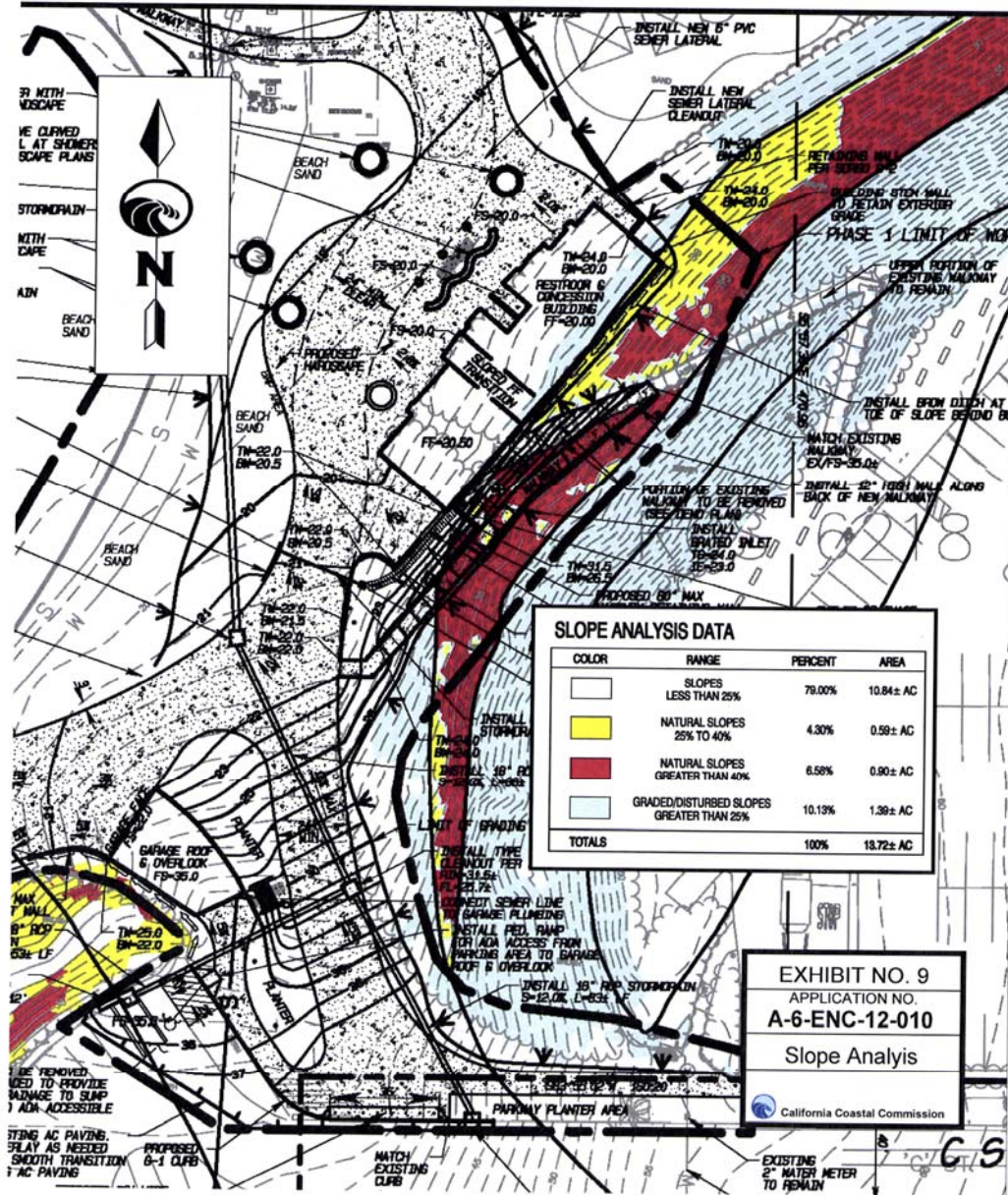
A4.1

EXHIBIT NO. 7
APPLICATION NO. A-6-ENC-12-010
Shade/Trash
California Coastal Commission

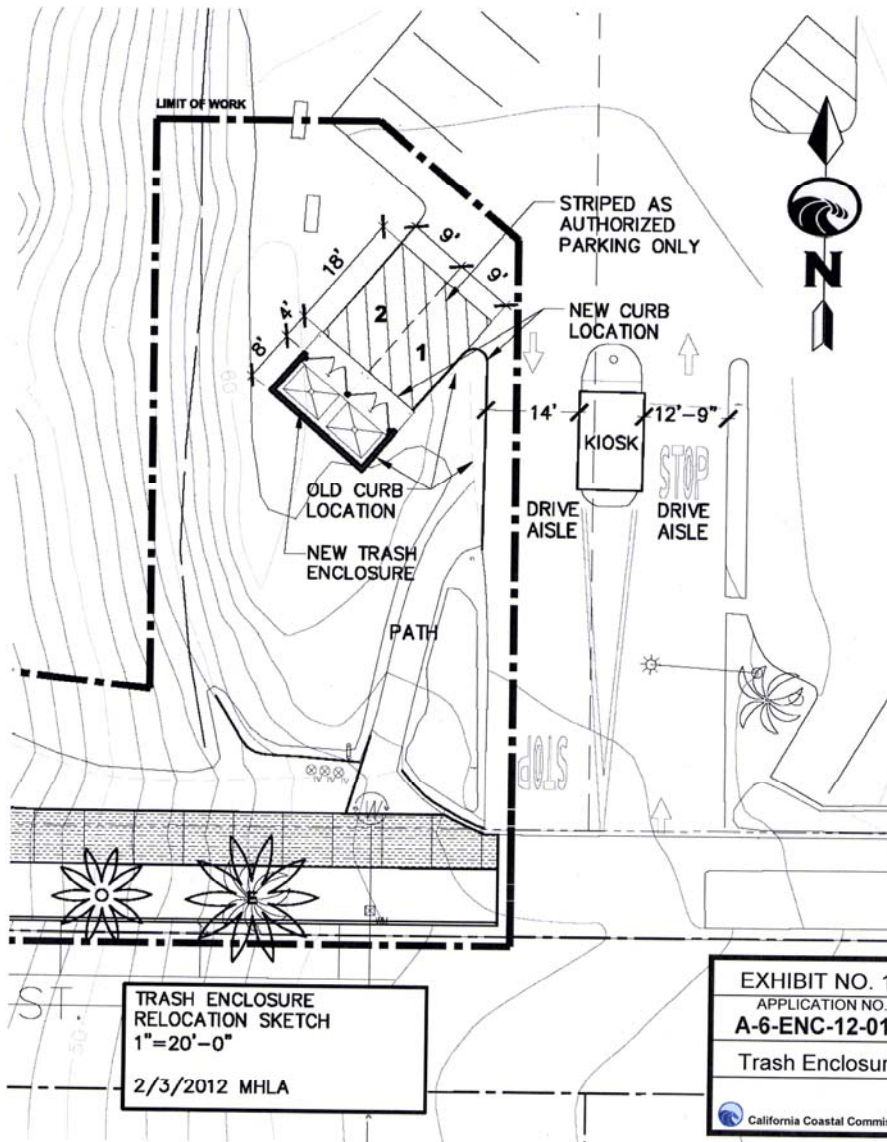
BLUFF DISTINCTION



SLOPE ANALYSIS



TRASH ENCLOSURE



ST. 50.
TRASH ENCLOSURE
RELOCATION SKETCH
1"=20'-0"
2/3/2012 MHLA

EXHIBIT NO. 10
APPLICATION NO.
A-6-ENC-12-010
Trash Enclosure
California Coastal Commission

NATIVE RESTORATION

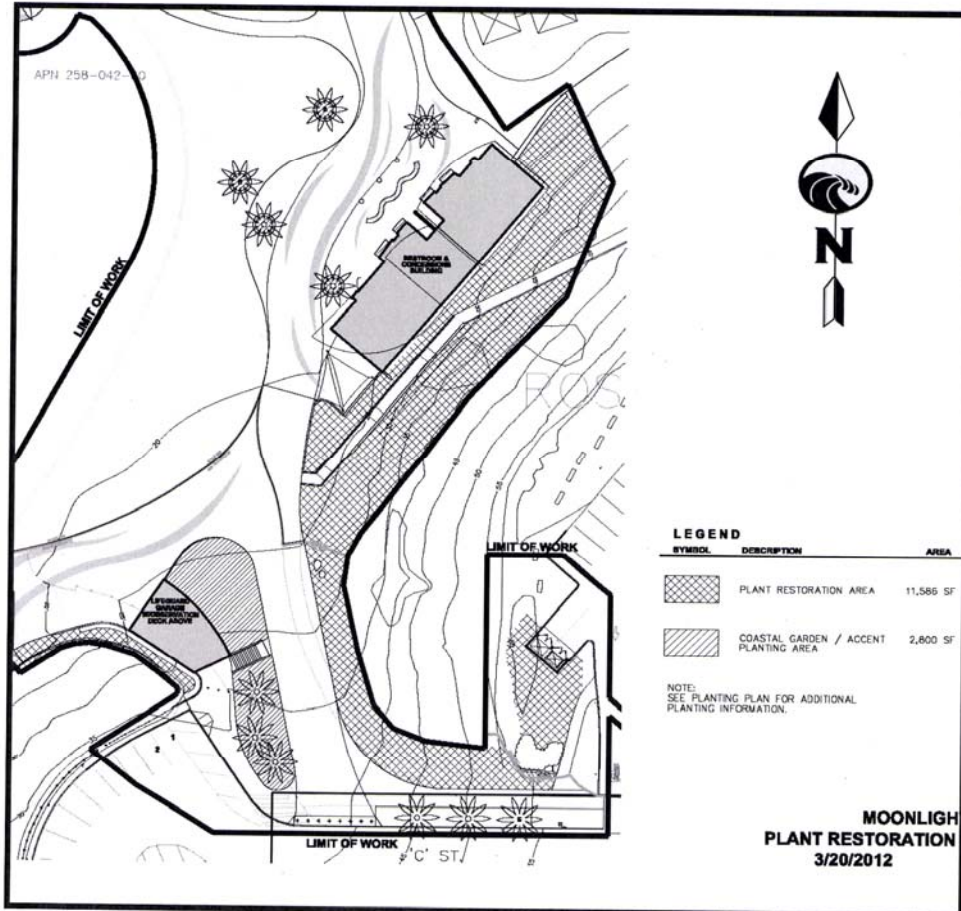


EXHIBIT NO. 11
APPLICATION NO.
A-6-ENC-12-010
Native Restoration
 California Coastal Commission

APPEAL

02/23/12 10:22 768 634 0761

P. 01

STATE OF CALIFORNIA — THE RESOURCES AGENCY

EDMUND G. BROWN JR., Governor

CALIFORNIA COASTAL COMMISSION

SAN DIEGO COAST DISTRICT OFFICE
7675 METROPOLITAN DRIVE, SUITE 103
SAN DIEGO, CA 92108-4402
VOICE (619) 787-2370 FAX (619) 787-2384



APPEAL FROM COASTAL PERMIT DECISION OF LOCAL GOVERNMENT

Please Review Attached Appeal Information Sheet Prior To Completing This Form.

SECTION I. Appellant(s)

Name: Donna Westbrook

Mailing Address: P.O. Box 230033

City: Encinitas, CA

Zip Code: 92024

Phone: (760) 632-0094

SECTION II. Decision Being Appealed

1. Name of local/port government:

City of Encinitas

2. Brief description of development being appealed:

Development at Moonlight Beach (First phase) - Increase in number of buildings (including a proposed 950 sq. ft. garage), cutting into steep slopes, more hardscape (paving), helicopter pad, additional volleyball courts on beach, additional fire rings (per staff description) This project has become like a housing development on the beach with city vision of more buildings are better than less buildings on the beach. Second phase is a proposed 1900 sq. ft. lifeguard tower (not part of this city approval)

3. Development's location (street address, assessor's parcel no., cross street, etc.):

Moonlight Beach: 400 C Street (APN: 258-042-40 and 258-074-25)

4. Description of decision being appealed (check one.):

- Approval; no special conditions
- Approval with special conditions:
- Denial

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FEB 23 2012

CALIFORNIA
COASTAL COMMISSION
SAN DIEGO COAST DISTRICT

Note: For jurisdictions with a total LCP, denial decisions by a local government cannot be appealed unless the development is a major energy or public works project. Denial decisions by port governments are not appealable.

TO BE COMPLETED BY COMMISSION:

APPEAL NO: A-6-ENC-12-10

DATE FILED: _____

DISTRICT: _____

EXHIBIT NO. 12

APPLICATION NO.

A-6-ENC-12-010

Appeal



California Coastal Commission

APPEAL, CONT.

02/23/12 10:24 760 634 8761

P. 02

APPEAL FROM COASTAL PERMIT DECISION OF LOCAL GOVERNMENT (Page 2)

5. Decision being appealed was made by (check one):

- Planning Director/Zoning Administrator
- City Council/Board of Supervisors
- Planning Commission
- Other

6. Date of local government's decision: January 19, 2012

7. Local government's file number (if any): Case number: 11-166 MUP/DR/CDP

SECTION III. Identification of Other Interested Persons

Give the names and addresses of the following parties. (Use additional paper as necessary.)

a. Name and mailing address of permit applicant:

City of Encinitas

b. Names and mailing addresses as available of those who testified (either verbally or in writing) at the city/county/port hearing(s). Include other parties which you know to be interested and should receive notice of this appeal.

(1)

(2)

(3)

(4)

APPEAL, CONT.

02/23/12 10:25 AM 768 634 0761

P. 03

APPEAL FROM COASTAL PERMIT DECISION OF LOCAL GOVERNMENT (Page 3)

SECTION IV. Reasons Supporting This Appeal

PLEASE NOTE:

- Appeals of local government coastal permit decisions are limited by a variety of factors and requirements of the Coastal Act. Please review the appeal information sheet for assistance in completing this section.
- State briefly your reasons for this appeal. Include a summary description of Local Coastal Program, Land Use Plan, or Port Master Plan policies and requirements in which you believe the project is inconsistent and the reasons the decision warrants a new hearing. (Use additional paper as necessary.)
- This need not be a complete or exhaustive statement of your reasons of appeal; however, there must be sufficient discussion for staff to determine that the appeal is allowed by law. The appellant, subsequent to filing the appeal, may submit additional information to the staff and/or Commission to support the appeal request.

1. The development of new buildings in square footage (phase 1) is over 250% greater than the current buildings. The current buildings are: snack or concession building ~ 600 sq. ft. and a restrooms building ~ 625 sq. ft.

The proposed buildings will be: concession and restrooms combined in one building of 3600 sq. ft., a garage of 950 sq. ft. and a trash enclosure (not specified as to square footage but assumed to be at least 10 ft. x 10 ft. for another 100 sq. ft. with these three structures totaling 4650 sq. ft. (This total doesn't include the square footage of the new lifeguard tower which is shown as 1900 sq. ft. on other drawings. The tower isn't part of this phase.)

2. The City will be encroaching and cutting into steep slopes to "tuck" the 3600 sq. ft. building into the bluff. The proposed grading as stated on page 1-11 (item #3) of the City staff report to the Planning Commission consists of: 1,625 sq. ft. of excavation, 300 sq. ft. of fill, and 1,325 sq. ft. of export. This is a major cutting of the bluff with this development. Retaining walls will also be needed. The encroaching and cutting into the steep slopes isn't consistent with the Resource Management RM-26 Goal 14 and Policy 14.1 which states: (See attached)

The City hasn't provided a plan that doesn't require grading into the slope or a smaller footprint of the buildings or even eliminating some of the buildings.

A helicopter pad is located on the upper parking lot. No analysis of noise or use of the pad. It is possible it could be used for more than emergency.

At least one other volleyball court is planned (according to staff). This would limit the amount of beach for general use to one specific use.

APPEAL, CONT.

02/23/12 10:27 760 634 0761

P.04

APPEAL FROM COASTAL PERMIT DECISION OF LOCAL GOVERNMENT (Page 4)

SECTION V. Certification

The information and facts stated above are correct to the best of my/our knowledge.

Signature on file

Signature of Appellant(s) or Authorized Agent

Date: February 22, 2012

Note: If signed by agent, appellant(s) must also sign below.

Section VI. Agent Authorization

I/We hereby authorize _____
to act as my/our representative and to bind me/us in all matters concerning this appeal.

Signature of Appellant(s)

Date: _____

APPEAL, CONT.

02/23/12 10:28 760 634 0761

P.05

To: California Coastal Commission
7575 Metropolitan Drive, Suite 103
San Diego, CA 92108
Attn: Eric Stevens

Subject: Appeal of Encinitas approval of Moonlight Beach development - Case #11-166
MUP/DR/CDP
Project not consistent with Encinitas General Plan, LCP, and Municipal Code

Background

On January 19, 2012 the Encinitas Planning Commission approved a development of buildings for Moonlight Beach. The development is not consistent with the Encinitas General Plan, the LCP, nor the Municipal Code for the following reasons:

1. The development of new buildings in square footage (phase 1) is over 250% greater than the current buildings. The current buildings are: snack or concession building ~ 600 sq. ft. and a restrooms building ~ 625 sq. ft.

The proposed buildings will be: concession and restrooms combined in one building of 3600 sq. ft., a garage of 950 sq. ft. and a trash enclose (not specified as to square footage but assumed to be at least 10 ft. x 10 ft. for another 100 sq. ft. with these three structures totaling 4600 sq. ft. (This total doesn't include the square footage of the new lifeguard tower which is shown as 1900 sq. ft. on other drawings. The tower isn't part of this phase.)

The City didn't perform any CEQA requirements on this huge increase in the size of buildings nor offered another plan with less square footage.

On page LU-38 and 38a it states:

Ecological Resource/Open Space/Parks

This land use designation includes all land that has

[The following text is heavily obscured by a large, dense black redaction box.]

See staff report
findings
for legible policy

APPEAL, CONT.

02/23/12 10:30 X 760 634 0761

P.06

Moonlight Beach Appeal - Page 2
Case #11-166 MUP/DR/CDP

The concession part of the building doesn't meet the requirements of the LCP section on pages LU-38 - LU38a and isn't consistent with the Land Use Element of the General Plan.

2. The City will be encroaching and cutting into steep slopes to "tuck" the 3600 sq.ft. building into the bluff. The proposed grading as stated on page 1-11 (item #3) of the City staff report to the Planning Commission consists of: 1,625 sq. ft. of excavation, 300 sq. ft. of fill, and 1,325 sq. ft. of export. This is a major cutting of the bluff with this development. Retaining walls will also be needed. The encroaching and cutting into the steep slopes isn't consistent with the Resource Management RM-26 Goal 14 and Policy 14.1 which states:

Goal 14: The City shall strategically control erosion and sedimentation from land use and development to avoid environmental impacts of lagoons and other sensitive biological resources and avoid the loss of public and private property. (Coastal Act/30231/30240/30250)

See staff report findings for legible policy

POLICY 14.1: To reduce erosion and sedimentation to the maximum extent feasible, grading shall be limited to the policy of that, in any land use and development, grading and vegetation removal shall be limited to the minimum necessary. (Coastal Act/30240/30250)

The City hasn't provided a plan that doesn't require grading into the slope or a smaller footprint of the buildings or even eliminating some of the buildings.

There are other items that violate the General Plan, the LCP, and the Municipal Code.

Donna Westbrook

APPEAL, CONT.

02/28/12 08:12 768 634 8761

P. 01

To: California Coastal Commission
7575 Metropolitan Drive, Suite 103
San Diego, CA 92108

Page 1 of 2

Attn: Eric Stevens

Subject: Appeal of Encinitas approval of Moonlight Beach development - Case #11-166
MUP/DR/CDP

Additional Information

The City didn't follow CEQA requirements of a study of the environmental impacts. The City's findings for a Coastal Development Permit are incorrect (item number 2). The City of Encinitas claims that the development is exempt from environmental review and cites certain sections of the guidelines, Sections 15301(1)(4), 15302, 15304(b), and 15332. None of these sections are applicable to the Moonlight Beach development.

In the case of Section 15301(1)(4) the section states:

Accessory (appurtenant) structures including garages, carports, patios, swimming pools, and fences.

The city is demolishing two buildings that aren't accessory structures. Section 15301(1)(4) doesn't apply.

In the case of Section 15302 the section states:

15302. Replacement or Reconstruction

Class 2 consists of replacement or reconstruction of existing structures and facilities where the new structure will be located on the same site as the structure replaced and will have substantially the same purpose and capacity as the structure replaced, including but not limited to:

- (a) Replacement or reconstruction of existing schools and hospitals to provide earthquake resistant structures which do not increase capacity more than 50 percent.
- (b) Replacement of a commercial structure with a new structure of substantially the same size, purpose, and capacity.
- (c) Replacement or reconstruction of existing utility systems and/or facilities involving negligible or no expansion of capacity.
- (d) Conversion of overhead electric utility distribution system facilities to underground including connection to existing overhead electric utility distribution lines where the surface is restored to the condition existing prior to the undergrounding.

Note: Authority cited: Section 21083, Public Resources Code; Reference: Section 21084, Public Resources Code.

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SAN DIEGO COAST DISTRICT

APPEAL, CONT.

02/28/12 08:14 X 768 534 8761

P.02

Page 2 of 2

Subject: Appeal of Encinitas approval of Moonlight Beach development - Case #11-166
MUP/DR/CDP

In Section 15302 (replacement or reconstruction) in order for a project to be exempt from CEQA new structures will be located on the same site as the structure replaced and will have substantially the same purpose and capacity as the structure replaced.

First, the city staff report clearly shows that the new buildings will not be build on the same site as the original buildings. Second, the new buildings will be a total 4650 square feet compared 1225 square feet of the original buildings to be demolished. Section 15302 requires that the replacement structures have the same purpose and capacity. The proposed buildings are larger and with more capacity than the original buildings.

Section 15302 doesn't apply, and the City can't use it to exempt the development from CEQA requirements.

In citing Section 15304(b) the City ignores Section 15304(a) which states:

(a) Grading on land with a slope of less than 10 percent, except that grading shall not be exempt in a waterway, in any wetland, in an officially designated (by federal, state, or local government action) scenic area, or in officially mapped areas of severe geologic hazard such as an Alquist-Priolo Earthquake Fault Zone or within an official Seismic Hazard Zone, as delineated by the State Geologist.

In summary related to Finding No. 2 of the Coastal Development Permit, the project isn't exempt from environmental review.

Donna Westbrook

CITY RESOLUTION

RESOLUTION NO. PC 2012-XX

A RESOLUTION OF THE CITY OF ENCINITAS PLANNING COMMISSION APPROVING A MAJOR USE PERMIT, DESIGN REVIEW PERMIT AND COASTAL DEVELOPMENT PERMIT TO DEMOLISH EXISTING CONCESSION STAND AND RESTROOM STRUCTURES AND CONSTRUCT A NEW RESTROOM/CONCESSION BUILDING, SHADE STRUCTURE, LIFEGUARD GARAGE AND A TRASH ENCLOSURE; INSTALLATION OF LANDSCAPING AND HARDSCAPE IMPROVEMENTS; AUTHORIZATION OF 2.68% STEEP SLOPES ENCROACHMENTS; AND ONE TEMPORARY CONSTRUCTION TRAILER FOR THE PROPERTY LOCATED AT 400 C STREET COMMONLY KNOWN AS MOONLIGHT STATE BEACH

(CASE NO. 11-166 MUP/DR/CDP; APN: 258-042-40 and 258-074-25)

WHEREAS, a request for consideration of a Major Use Permit, Design Review Permit and Coastal Development Permit was filed by the Parks & Recreation Department on behalf of the City of Encinitas to demolish existing restroom and concession buildings and to construct a new restroom/concession building, a new lifeguard garage, a new shade structure, new trash enclosure, and new hardscape and landscaping improvements; authorization of 2.68% encroachments into steep slopes; and to allow one temporary construction trailer during the construction phase of the project to be removed upon completion of the project; all in accordance with Chapters 30.74 (Use Permit), 23.08 (Design Review) and 30.80 (Coastal Development Permit) of the City of Encinitas Municipal Code, for the property located in the Moonlight Beach Park (D-MBP) zone of the Downtown Encinitas Specific Plan (DESP) and within the Ecological Resource/Open Space/Parks zone, Hillside/Inland Bluff Overlay Zone and the California Coastal Commission Appeal Jurisdiction, commonly referred to as Moonlight Beach State Park.

WHEREAS, the Planning Commission conducted a noticed public hearing on the application on January 19, 2012, at which time all those desiring to be heard were heard; and

WHEREAS, the Planning Commission considered, without limitation:

1. The January 19, 2012 agenda report to the Planning Commission with attachments;
2. The General Plan, Local Coastal Program, Downtown Encinitas Specific Plan, Municipal Code and associated Land Use Maps;
3. Oral evidence submitted at the hearing;
4. Written evidence submitted at the hearing;
5. Project drawings consisting of 17 sheets, including Title Sheet, Existing Site/Demo Plan, Architectural Site Plan, Conceptual Staging Plans (2 Sheets), Lighting Plan, Preliminary Grading Plan, Slope Analysis, Lifeguard Garage Plans and Elevations, Restroom and Concession Building Plans and Elevations (2 Sheets), Accessory Structures, Architectural Imagery, Preliminary Landscape and Imagery Plans (3

PBD/RS/T:\Resolutions\RPC11-166MUPDRCDP 1

EXHIBIT NO. 13

APPLICATION NO.

A-6-ENC-12-010

Resolution

 California Coastal Commission

CITY RESOLUTION, CONT.

Sheets), and Sign Graphics; all dated received by the City of Encinitas on December 7, 2011; and

WHEREAS, the Planning Commission made the following findings pursuant to Sections 30.74.070 (Use Permit), 23.08.080 (Design Review) and 30.80.090 (Coastal Development Permit) of the Encinitas Municipal Code:

(SEE ATTACHMENT "A")

NOW, THEREFORE, BE IT RESOLVED that the Planning Commission of the City of Encinitas hereby approves application 11-166 MUP/DR/CDP subject to the following conditions:

(SEE ATTACHMENT "B")

BE IT FURTHER RESOLVED that the Planning Commission, in its independent judgment, finds that this project is categorically exempt from environmental review pursuant to Sections 15301(l)(4), 15302, 15304 (b) and 15332. Section 15301(l)(4) exempts the demolition of accessory structures and Section 15302 exempts replacement or reconstruction of existing structures and facilities where the new structure will be located on the same site as the structure replaced and will have substantially the same purpose and capacity as the structure replaced. Section 15304(b) exempts new landscaping and Section 15332 exempts in-fill developments.

PASSED AND ADOPTED this 19th day of January, 2012 by the following vote, to wit:

AYES:

NAYS:

ABSENT:

ABSTAIN:

Jo Ann Shannon, Chair of the
Encinitas Planning Commission

ATTEST:

Patrick Murphy
Secretary

NOTE: This action is subject to Chapter 1.04 of the Municipal Code, which specifies time limits for legal challenges.

CITY CDP FINDINGS

FINDINGS FOR A COASTAL DEVELOPMENT PERMIT

STANDARD: Section 30.80.090 of the Municipal Code provides that the authorized agency must make the following findings of fact, based upon the information presented in the application and during the Public Hearing, in order to approve a coastal development permit:

1. The project is consistent with the certified Local Coastal Program of the City of Encinitas; and
2. The proposed development conforms with Public Resources Code Section 21000 and following (CEQA) in that there are no feasible mitigation measures or feasible alternatives available which would substantially lessen any significant adverse impact that the activity may have on the environment; and
3. For projects involving development between the sea or other body of water and the nearest public road, approval shall include a specific finding that such development is in conformity with the public access and public recreation policies of Section 30200 et. seq. of the Coastal Act.

Facts: The applicant proposes to demolish existing concession stand and bathroom structures and associated hardscape and construct a new building housing a new concession stand, bathrooms and storage, construct a new shade structure and a new garage for storage of lifeguard equipments, reconfigure the lower portion of the access ramp from the upper parking lot to the beach, and install associated landscape and hardscape improvements throughout the project site. The application also includes a request to authorize proposed encroachments into steep slopes over 25% gradients in accordance with Section 30.34.030 of the Municipal Code and a request for one temporary construction trailer during the construction phase of the project to be removed when the project is complete. The proposed application also includes the construction of a 9-foot 5-inch tall trash enclosure at a minimum of 40 feet from an existing coastal bluff edge. Because site-specific analysis indicates the presence of a coastal bluff, the regulations contained in Municipal Code Section 30.34.020 (Coastal Bluff Overlay Zone) shall apply. Pursuant to Section 30.34.020B1 of the Municipal Code, no accessory structures shall be constructed, placed or installed within 40 feet of the top edge of a coastal bluff. The City (applicant) acknowledges that the proposed trash enclosure cannot be afforded protection in the future and should it become threatened in the future from erosion or bluff failure, it shall be removed or relocated. The criteria required to be considered in order to authorize improvements on a bluff top property and within steep slope areas have been addressed by the geotechnical information submitted with the project application. The geotechnical evaluation and letter report and addendums prepared by Christian Wheeler Engineering, as requested by the City, were subject to a Third Party Geotechnical Review by the City's Geotechnical Consultant, Geopacifica. Geopacifica found that said geotechnical reports provide information to adequately meet the standards of the City of Encinitas Municipal Code.

A pre-1972 Coastal Act seawall exists underneath the sand area west of the proposed restroom/concession building. The subject application is not proposing to remove or reinforce the seawall structure. Removal of the seawall, according to the project Geotechnical Engineer Christian Wheeler, would be detrimental to the stability of and

CITY CDP FINDINGS, CONT.

resistance to erosion of the areas to support the existing overall public beach recreation use and existing and proposed coastal dependent uses and facilities including the proposed concession/restroom structure, lifeguard tower and proposed garage, public parking facilities, children's play area and public viewpoint. Instead, as a condition of approval of this resolution, the structural and aesthetic conditions of the seawall must be evaluated at any time in the future when the seawall becomes uncovered either by human activities or severe erosion as a result of an extreme storm/swell event. The analysis must consider the impacts of the removal of the seawall and how to mitigate the impacts. If the seawall cannot be removed, the analysis must consider alternatives to eliminate and/or minimize any impacts (i.e. safety, aesthetics, etc.) the seawall may have to the public and coastal resources.

The existing site and surrounding neighborhood consist of a mixture of single- and multi-family residential units. The project as proposed complies with the development standards of the subject D-MBP zone and Chapter 30.32 (Ecological Resources/Open Space/Parks Zone) including parking, lot coverage and building height, and will be required to comply with all applicable Building and Fire codes through the standard plan checking process.

Discussion: With approval of the Major Use Permit and Design Review Permit, as conditioned, the proposed project is in conformance with the policies and development standards of the General Plan, the Downtown Encinitas Specific Plan, the Municipal Code and the Local Coastal Plan. Related to Finding No. 2, the project has been determined to be exempt from environmental review pursuant to Sections 15301(1)(4), 15302, 15304 (b) and 15332, which respectively exempt the demolition of accessory structures, replacement or reconstruction of existing structures and facilities where the new structure will be located on the same site as the structure replaced and will have substantially the same purpose and capacity as the structure replaced, new landscaping and in-fill developments. Related to Finding No. 3, the project is improvements to public facilities and amenities at Moonlight Beach which would give the public better access to the scenic qualities of the coastal resources and add to the recreational opportunities at the public beach. Additional active recreational beach areas will be provided with the removal of existing structures and by locating new structures away from public beach areas and access. No additional access points directly to the shore will be provided and no existing access points will be eliminated with the proposed project. Public access to the shore is currently provided as part of Moonlight State Beach and will be maintained with the improvements. The ability of the public to access the shore is not adversely impacted with this project; therefore, no condition requiring public access is imposed with the project.

Conclusion: The Planning Commission finds that 1) the project is consistent with the certified Local Coastal Program of the City of Encinitas; 2) the project as proposed is exempt from CEQA review and will not have a significant adverse impact on the environment; and regarding finding 3) the project will enhance public recreational facilities and the public access to the shore currently provided at Moonlight Beach will be maintained.

CITY CONDITIONS

ATTACHMENT "B"
Resolution No. PC 2012-XX
Case No. 11-166 MUP/DR/CDP

Applicant: Parks & Recreation Department on behalf of the City of Encinitas

Location: 400 C. Street (APN: 258-042-40 and 258-074-25)

SC1 SPECIFIC CONDITIONS:

- SC2** At any time after two years from the date of this approval, on January 19, 2014 at 5:00 pm, or the expiration date of any extension granted in accordance with the Municipal Code, the City may require a noticed public hearing to be scheduled before the authorized agency to determine if there has been demonstrated a good faith intent to proceed in reliance on this approval. If the authorized agency finds that a good faith intent to proceed has not been demonstrated, the application shall be deemed expired as of the above date (or the expiration date of any extension). The determination of the authorized agency may be appealed to the City Council within 15 days of the date of the determination.
- SC5** This project is conditionally approved as set forth on the application dated received by the City on October 4, 2011 and project architectural drawings consisting of 17 sheets, including Title Sheet, Existing Site/Demo Plan, Architectural Site Plan, Conceptual Staging Plans (2 Sheets), Lighting Plan, Preliminary Grading Plan, Slope Analysis, Lifeguard Garage Plans and Elevations, Restroom and Concession Building Plans and Elevations (2 Sheets), Accessory Structures, Architectural Imagery, Preliminary Landscape and Imagery Plans (3 Sheets) and Sign Graphics; and 8.5" x 11" colored copies of the drawings; all dated received by the City of Encinitas on December 7, 2011; all designated as approved by the Planning Commission on January 19, 2012, and shall not be altered without express authorization by the Planning and Building Department.
- SCA** The existing pre-1972 Coastal Act seawall shall remain with an understanding that it may become exposed at some time in the future due to human activities or severe erosion as a result of an extreme storm/swell event. If that occurs, the City shall analyze the structural and aesthetic conditions of the seawall. The analysis must consider the impacts of the removal of the seawall and how to mitigate the impacts. If the seawall cannot be removed, the analysis shall consider alternatives to eliminate and/or minimize any impacts (i.e. safety, aesthetics, etc.) the seawall may have to the public and coastal resources.
- SCB** The proposed trash closure shall be screened on the west, south and east sides with landscaping materials. If at the time of planning final inspection that it is determined that sufficient screening is not provided, the applicant shall be required to provide additional landscaping materials to the satisfaction of the Planning and Building Department prior to final inspection approval.
- SCC** The proposed trash enclosure shall be removed and/or relocated to the satisfaction of the Planning and Building and Engineering Services Departments should it become threatened in the future from erosion or bluff failure.

CITY CONDITIONS, CONT.

- SCD The one temporary construction trailer shall comply with the provisions of Chapter 30.46 of the Municipal Code and shall be removed from the subject property upon completion of construction of the proposed project.
- SCE All corrugated metal roof for the proposed buildings shall be non-reflective. The roof material for the trash enclosure and the shade sail material shall also be non-reflective.
- SCF The plans to satisfy the following conditions shall be approved and secured to the satisfaction of the Engineering Services Department prior to issuance of grading/building permit:
1. As shown on the Preliminary Grading plan, the applicant shall provide stormwater quality BMP/IMP treatment facilities to collect and treat all runoff generated by all new and/or removed and replaced impervious surfaces. The City shall be responsible for the maintenance of the designated BMP/IMP areas.
 2. The proposed trash enclosure in the parking lot shall be fitted to comply with Storm Water Best Management Practice requirements. The trash enclosure shall have an impervious, non-combustible roof that will not allow rain water to enter the enclosure. The enclosure shall be lockable and locked when not in use. A berm shall be installed at all openings to hold in any liquids that escape from the dumpster and to prevent any flow of storm water through the trash enclosure area. The berm can be designed wide and flat to allow rolling of the dumpster in and out. The floor of the enclosure shall be self contained and shall be sloped to the center to prevent any liquid spillage out onto the adjacent parking lot and/or into a stormdrain inlet. All liquids/storm water collected in the trash enclosure floor shall be disposed as required by the Engineering Services Department and not out on the street and into any stormdrain outlet. A separate building permit may be required for this structure.
- SCG The plans to satisfy the following conditions shall be approved and secured to the satisfaction of the Fire Department prior to issuance of grading/building permit:
1. Emergency access road between B Street and C Street beach entrances shall be 24 feet (at beach level) as shown on the project plans. The emergency vehicle driveway entry at B Street shall provide and maintain a minimum width of 16 feet and emergency vehicle driveway entry at C Street shall provide and maintain a minimum width of 36 feet, as shown on the project plans. The permanent emergency access roads shall be all weather surface capable of supporting weight of fire apparatus, not less than 75,000 pounds. Also, the emergency access road leading from C Street driveway entry down to the beach level is shown on the plan as 15% grade. This road shall be constructed of P.C.C. (Portland Cement) with a heavy broom finish, perpendicular to the path of vehicle travel.
 2. During construction, a minimum 16-foot wide entry driveway shall be provided at all times at B Street entrance and/or C Street entrance with a minimum of one entryway to the beach available at all times. The access road (at beach level) leading from B Street to C Street shall be maintained at a minimum 16 feet wide until such time that the road is widened to final width of 24 feet. The temporary emergency access road shall be all weather surface and support weight of fire apparatus.

CITY CONDITIONS, CONT.

3. Provide a copy of plan on Auto Cad file, for fire department use for emergency response maps.
4. Provide address numbers for lifeguard tower and concession stand. Also, provide communications (phone line) for emergency use in all buildings.
5. Class A roofs shall be provided for all buildings.
6. Any construction dumpster to be used on site shall have a metal top, with solid metal doors that lock on one end of the dumpster. This is to prevent arson-related fires in the Moonlight Beach areas. The dumpsters shall be emptied regularly and locked when not in use.
7. A concrete ramp shall be provided and installed on the east side of the "Helo-Pad" in the upper parking lot of Moonlight Beach. The ramp is necessary for medical gurney use during emergency response to incidents at Moonlight Beach. Any shrubs or vegetation that interferes with this ramp shall be removed.

SCH Railings shall be provided for the reconfigured access ramp. The railing material and color shall match existing railing on the top half portion of the ramp to remain.

SCI The subject approval applies to only those portions of development specifically requested herein. Any further development/improvement requests for Moonlight Beach shall be subject to the provisions of Chapters 30.74 (Use Permit) and 23.08 (Design Review) of the Municipal Code related to Major Use Permits and Design Review Permits. All conditions of approval of previous discretionary actions for developments at Moonlight Beach shall remain in full force and effect unless specifically modified herein.

G1 **STANDARD CONDITIONS:**

CONTACT THE PLANNING AND BUILDING DEPARTMENT REGARDING COMPLIANCE WITH THE FOLLOWING CONDITIONS:

- G2 This approval may be appealed to the City Council within 15 calendar days from the date of this approval in accordance with Chapter 1.12 of the Municipal Code.
- G3 This project is located within the Coastal Appeal Zone and may be appealed to the California Coastal Commission pursuant to Coastal Act Section 30603 and Chapter 30.04 of the City of Encinitas Municipal Code. An appeal of the Planning Commission's decision must be filed with the Coastal Commission within 10 days following the Coastal Commission's receipt of the Notice of Final Action. Applicants will be notified by the Coastal Commission as to the date the Commission's appeal period will conclude. Appeals must be in writing to the Coastal Commission, San Diego Coast District office.
- G5 Approval of this request shall not waive compliance with any sections of the Municipal Code and all other applicable City regulations in effect at the time of Building Permit issuance unless specifically waived herein.
- G9 Trash enclosure(s) shall be constructed of masonry with an exterior compatible with that of the building(s), and shall be provided with view-obstructing solid metal gates as approved by the authorized agency. Adequate space for recyclable materials shall be provided within

CITY CONDITIONS, CONT.

the enclosure in accordance with Municipal Code requirements. The applicant shall review the design of the trash enclosure with the service provider and receive approval prior to building permit issuance.

- G10 All retaining and other freestanding walls, fences, and enclosures shall be architecturally designed in a manner similar to, and consistent with, the primary structures (e.g. stucco-coated masonry, split-face block or slump stone). These items shall be approved by the Planning and Building Department prior to the issuance of building and/or grading permits.
- G11 All roof-mounted equipment and appurtenances, including air conditioners and their associated vents, conduits and other mechanical and electrical equipment, shall be architecturally integrated, and shall be shielded from view and sound buffered to the satisfaction of the Planning and Building Department. **Note: All rooftop equipment shall be assumed visible unless demonstrated otherwise to the satisfaction of the Planning and Building Department, and adequate structural support shall be incorporated into building design.** Rooftop vent pipes shall be combined below the roof, and shall utilize decorative caps where visible from any point. Ground-mounted mechanical and electrical equipment shall also be screened through use of a wall, fence, landscaping, berm, or combination thereof to the satisfaction of the Planning and Building Department. All exterior accessory structures shall be designed to be compatible with the primary building's exterior to the satisfaction of the Planning and Building Department.
- G12 Prior to any use of the project site pursuant to this permit, all conditions of approval contained herein shall be completed or secured to the satisfaction of the Planning and Building Department.
- G14 A plan shall be submitted for approval by the Planning and Building Department, the Engineering Services Department, and the Fire Department regarding the security treatment of the site during the construction phase, the on- and off-site circulation and parking of construction workers' vehicles, and any heavy equipment needed for the construction of the project.
- G16 Parking lot layout shall meet the standards of the Municipal Code and the Off Street Parking Design Manual.
- L1 The project is subject to Chapter 23.26 of the Municipal Code (Water Efficient Landscape Program), which requires a landscape and irrigation plan to be prepared by a State licensed landscape designer. The requirements for the plans are listed in Chapter 23.26. The landscape and irrigation plans must be submitted as part of the building permit application for the project.
- L2 All required plantings and automated irrigation systems shall be in place prior to use or occupancy of new buildings or structures. All required plantings and automated irrigation systems shall be maintained in good condition, and whenever necessary, shall be replaced with new materials to ensure continued compliance with applicable landscaping, buffering, and screening requirements. All landscaping and irrigation systems shall be maintained in a manner that will not depreciate adjacent property values and otherwise adversely affect

CITY CONDITIONS, CONT.

adjacent properties. All irrigation lines shall be installed and maintained underground (except drip irrigation systems).

- L3 All parking areas and driveways shall conform with Chapter 30.54 of the Municipal Code and the City's Off-street Parking and Design Manual incorporated by reference therein.
- L5 All masonry freestanding or retaining walls visible from points beyond the project site shall be treated with a protective sealant coating to facilitate graffiti removal. The sealant shall be of a type satisfactory to the Engineering and Planning and Building Departments. The property owner shall be responsible for the removal in a timely manner of any graffiti posted on such walls.
- S1 Any signs proposed for this development shall be designed and approved in conformance with Encinitas Municipal Code Chapter 30.60.
- S3 Signs are approved as submitted and as shown in the approved project plans. Any alteration/addition to the approved signs not exempted in Municipal Code Chapter 30.60 may require a permit amendment, and the applicant should contact the Planning and Building Department prior to undertaking any such modification.
- DR1 Any future modifications to the approved project will be reviewed relative to the findings for substantial conformance with a design review permit contained in Section 23.08.140 of the Municipal Code. Modifications beyond the scope described therein may require submittal of an amendment to the design review permit and approval by the authorized agency.
- DR3 All project grading shall conform with the approved plans. If no grading is proposed on the approved plans, or subsequent grading plans are inconsistent with the grading shown on the approved plans, a design review permit for such grading shall be obtained from the authorized agency of the City prior to issuance of grading or building permits.
- U2 In the event that any of the conditions of this permit are not satisfied, the Planning and Building Department shall cause a noticed hearing to be set before the authorized agency to determine whether the City of Encinitas should revoke this permit.
- U3 Upon a showing of compelling public necessity demonstrated at a noticed hearing, the City of Encinitas, acting through the authorized agency, may add, amend, or delete conditions and regulations contained in this permit.
- U4 Nothing in this permit shall relieve the applicant from complying with conditions and regulations generally imposed upon activities similar in nature to the activity authorized by this permit.
- U5 Nothing in this permit shall authorize the applicant to intensify the authorized activity beyond that which is specifically described in this permit.

CITY CONDITIONS, CONT.

- U7 Any future modifications to the approved project will be reviewed relative to the findings for substantial conformance with a use permit contained in Section 30.74.105 of the Municipal Code. Modifications beyond the scope described therein will require submittal of an amendment to the use permit and approval by the authorized agency.

B1 BUILDING CONDITION(S):

CONTACT THE ENCINITAS BUILDING DIVISION REGARDING COMPLIANCE WITH THE FOLLOWING CONDITION:

- B2 The applicant shall submit a complete set of construction plans to the Building Division for plancheck processing. The submittal shall include a Soils/Geotechnical Report, structural calculations, and State Energy compliance documentation (Title 24). Construction plans shall include a site plan, a foundation plan, floor and roof framing plans, floor plan(s), section details, exterior elevations, and materials specifications. Submitted plans must show compliance with the latest adopted editions of the California Building Code (The Uniform Building Code with California Amendments, the California Mechanical, Electrical and Plumbing Codes). Commercial and Multi-residential construction must also contain details and notes to show compliance with State disabled accessibility mandates. These comments are preliminary only. A comprehensive plancheck will be completed prior to permit issuance and additional technical code requirements may be identified and changes to the originally submitted plans may be required.

E1 ENGINEERING CONDITIONS:

CONTACT THE ENGINEERING SERVICES DEPARTMENT REGARDING COMPLIANCE WITH THE FOLLOWING CONDITION(S):

- E2 All City Codes, regulations, and policies in effect at the time of building/grading permit issuance shall apply.
- E3 All drawings submitted for Engineering permits are required to reference the NAVD 88 datum; the NGVD 29 datum will not be accepted.

EG1 Grading Conditions

- EG3 The owner shall obtain a grading permit prior to the commencement of any clearing or grading of the site.
- EG4 The grading for this project is defined in Chapter 23.24 of the Encinitas Municipal Code. Grading shall be performed under the observation of a civil engineer whose responsibility it shall be to coordinate site inspection and testing to ensure compliance of the work with the approved grading plan, submit required reports to the Engineering Services Director and verify compliance with Chapter 23.24 of the Encinitas Municipal Code.
- EG5 No grading shall occur outside the limits of the project unless a letter of permission is obtained from the owners of the affected properties.

CITY CONDITIONS, CONT.

- EG6 Separate grading plans shall be submitted and approved and separate grading permits issued for borrow or disposal sites if located within city limits.
- EG7 All newly created slopes within this project shall be no steeper than 2:1.
- EG8 A soils/geological/hydraulic report (as applicable) shall be prepared by a qualified engineer licensed by the State of California to perform such work. The report shall be submitted with the first grading plan submittal and shall be approved prior to issuance of any grading permit for the project.
- EG9 Prior to hauling dirt or construction materials to any proposed construction site within this project the owner shall submit to and receive approval from the Engineering Services Director for the proposed haul route. The owner shall comply with all conditions and requirements the Engineering Services Director may impose with regards to the hauling operation.
- EG10 In accordance with Section 23.24.370 (A) of the Municipal Code, no grading permit shall be issued for work occurring between October 1st of any year and April 15th of the following year, unless the plans for such work include details of protective measures, including desilting basins or other temporary drainage or control measures, or both, as may be deemed necessary by the field inspector to protect the adjoining public and private property from damage by erosion, flooding, or the deposition of mud or debris which may originate from the site or result from such grading operations.
- ED1 **Drainage Conditions**
- ED2A An erosion control system shall be designed and installed onsite during all construction activity. The system shall prevent discharge of sediment and all other pollutants onto adjacent streets and into the storm drain system. The City of Encinitas Best Management Practice Manual shall be employed to determine appropriate storm water pollution control practices during construction.
- ED3 A drainage system capable of handling and disposing of all surface water originating within the project site, and all surface waters that may flow onto the project site from adjacent lands, shall be required. Said drainage system shall include any easements and structures required by the Engineering Services Director to properly handle the drainage.
- ES1 **Street Conditions**
- ES5 Prior to any work being performed in the public right-of-way, a right-of-way construction permit shall be obtained from the Engineering Services Director and appropriate fees paid, in addition to any other permits required.

CITY CONDITIONS, CONT.

EU1 Utilities

- EU2 The owner shall comply with all the rules, regulations, and design requirements of the respective utility agencies regarding services to the project.
- EU3 The owner shall be responsible for coordination with S.D.G. & E., AT&T, and other applicable authorities.
- EU4 All proposed utilities within the project shall be installed underground including existing utilities unless exempt by the Municipal Code.

ESW1 Storm Water Pollution Control Conditions

- ESW4. Priority Projects shall implement a single or a combination of storm water Best Management Practice methods in order to reduce to the maximum extent practicable the quantity of pollutants entering the public storm drain system or any receiving body of water supporting beneficial uses. All Priority Projects shall construct and implement a structural treatment control BMP, such as natural bio-filtration system or a treatment detention basin, designed to infiltrate, filter, or treat a quantity of storm runoff equal to or greater than the volume generated by a 0.6" precipitation storm event in a duration of twenty-four hours or the maximum flow rate produced by a rainfall of 0.2 inches during each hour of a storm event. The filtration system shall be designed based upon best management practice standards and must be approved by the City Engineer. A covenant approved by the City shall be recorded against the property to ensure the professional maintenance, repair, and replacement of the storm water quality BMP as necessary into perpetuity. The covenant shall also detail the funding mechanism for the required maintenance. A **Grading Plan** identifying all landscape areas designed for storm water pollution control (SWPC) and Best Management Practice shall be submitted to the City for Engineering Services Department approval. A note shall be placed on the plans indicating that the modification or removal of the SWPC facilities without a permit from the City is prohibited.
- ESW9 For storm water pollution control purposes, all runoff from all roof drains shall discharge onto grass and landscape areas prior to collection and discharge onto the street and/or into the public storm drain system. Grass and landscape areas designated for storm water pollution control shall not be modified without a permit from the City. A note to this effect shall be placed on the **Grading plan**.

SUPPORT LETTERS



*City of
Encinitas*

Office of
The Mayor

March 20, 2012

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

Jerome Stocks
Mayor

RE: SUPPORT FOR MOONLIGHT STATE BEACH IMPROVEMENT PROJECT

Honorable Commissioners:

Kristin Gaspar
Deputy Mayor

The City of Encinitas operates and maintains Moonlight and Leucadia State Beaches through a long-term lease agreement with the State of California. The City spends over \$890,000 annually for maintenance and lifeguard services at those facilities. The Moonlight State Beach improvement project generally consists of removing the existing restroom and concession buildings, expansion of the beach sand recreation area, construction of a combined restroom/concession building, a garage for lifeguard storage that also serves as an overlook, and general landscape and hardscape improvements throughout the site (see attached site plan). The existing facilities do not meet the current or future projected needs of the public and the existing facilities are in a deteriorating condition and in need of replacement.

Teresa Arballo Barth
Council Member

Moonlight State Beach (Our Outdoor Living Room) Improvement Project

James Bond
Council Member

- Over 1.5 million people visit Moonlight State Beach annually. It is popular with both tourists and residents, and it is one of the most visited beaches in Encinitas.
- It is one of the most accessible and family-friendly beaches in San Diego County with a wide sandy beach for swimming, surfing, sun-bathing, and fishing.
- Amenities include a grassy playground and swings, volleyball courts, snack bar, fire pits, public restrooms, and outdoor showers.
- Many special events and recreation activities are held annually that include a triathlon, summers camps where hundreds of kids learn water safety skills, Wavecrest Woody which is the largest gathering of wooden paneled automobiles, K5 Surf Classic, Summer Sunday Concerts, Paddle & Swim, and many more.

Mark Muir
Council Member


Please consider this worthwhile project and the importance of Moonlight State Beach which is the center of recreation and social life in Encinitas since 1915.

Gus Vina
City Manager

Sincerely,


Jerome Stocks
Mayor

Attachments: Letter of Support from Director Coleman
Site Plan

EXHIBIT NO. 14
APPLICATION NO.
A-6-ENC-12-010
Support Letters
 California Coastal Commission

SUPPORT LETTERS, CONT.



State of California - Natural Resources Agency

DEPARTMENT OF PARKS AND RECREATION
(916) 653-8380

Edmund G. Brown, Jr., Governor

Ruth Coleman, Director

January 18, 2012

Michael Stauffer
Senior Analyst
City of Encinitas
505 Vulcan Avenue
Encinitas, California 92024

Dear Mr. Stauffer:

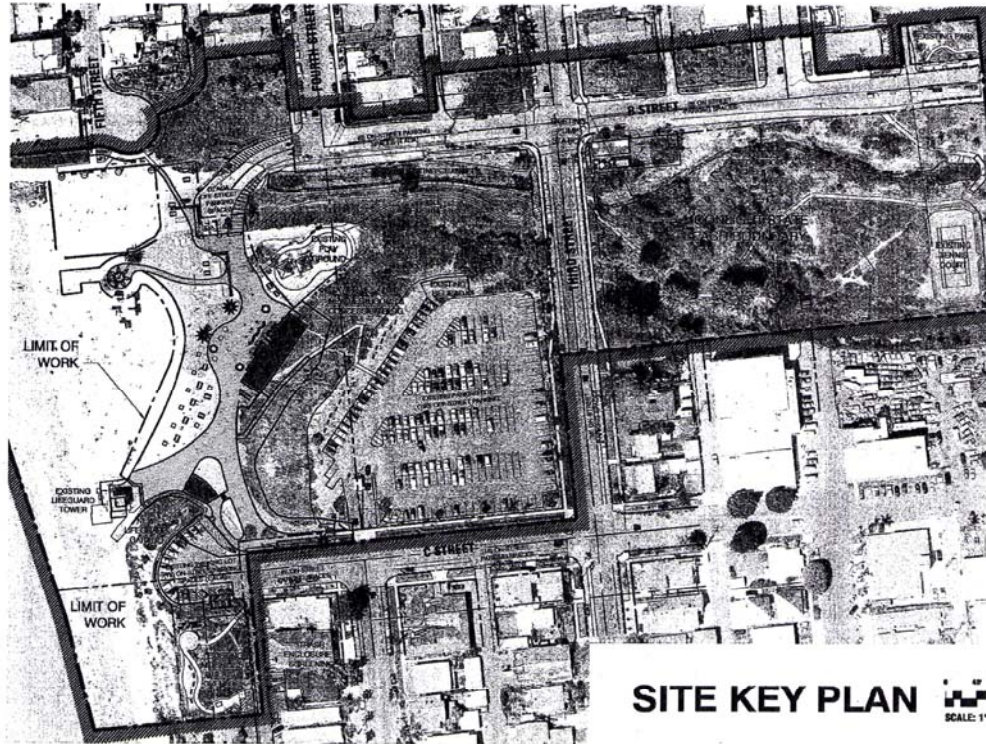
I am writing to express our department's strong support for the City of Encinitas' project to renovate Moonlight State Beach. The improvements planned by the City are consistent with the park General Plan and as such will be a valuable enhancement to the park. We appreciate that the City has been diligent in working toward implementation of this important project and trust in their ability to complete it expeditiously.

Please feel free to use this letter as evidence of our Department's strong support for your project; also feel free to refer any questions to Acting District Superintendent Clay Phillips at (916) 688-3356.

Sincerely,

Ruth Coleman
Director

SUPPORT LETTERS, CONT.



SUPPORT LETTERS, CONT.

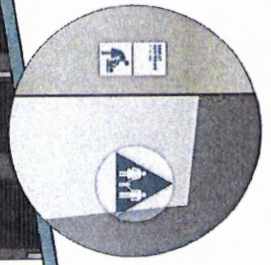


SUPPORT LETTERS, CONT.

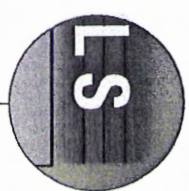


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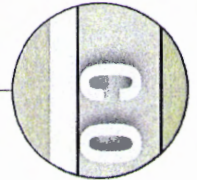
ADA PLACES (AS NEEDED)
COOL, GREEN LETTERING AND ICONS
ON BRUSHED ALUMINUM SIGN PANELS



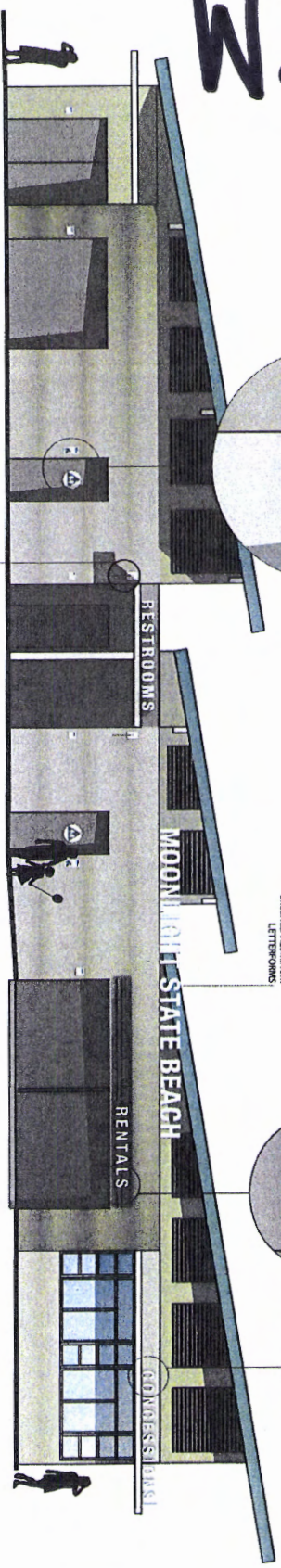
FREE STANDING PIN-MOUNT
BRUSHED ALUMINUM
LETTERFORMS



WOOD SIGN PANEL (PE WOOD)
BRUSHED ALUMINUM LETTERFORMS



PIN-MOUNT
BRUSHED ALUMINUM
LETTERFORMS



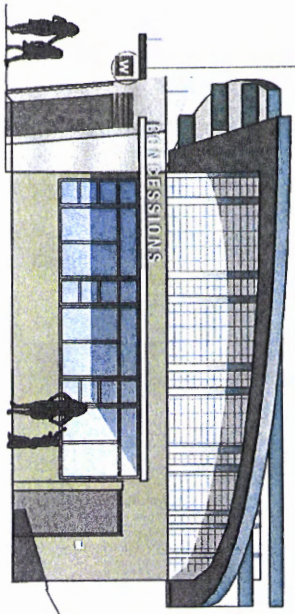
WEST ELEVATION
1/4"=1'-0" / DETAILS 1"=4'-0"



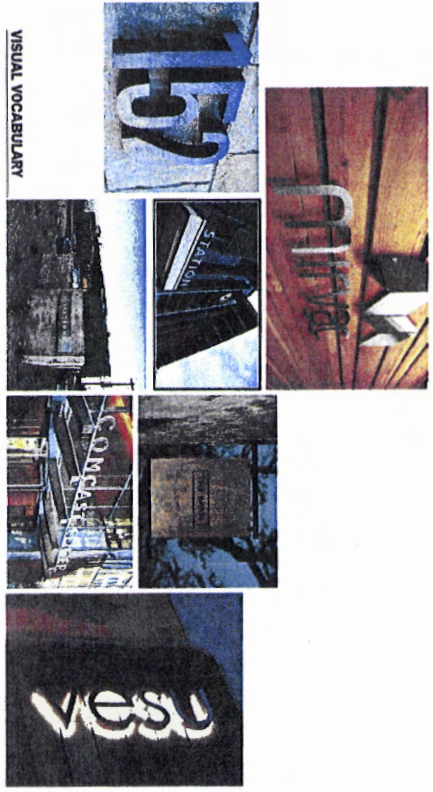
FREE WOOD BLADE SIGN
BRUSHED ALUMINUM LETTERS
AND BRACKET



FREE WOOD BLADE SIGN
PIN-MOUNT
BRUSHED ALUMINUM LETTERS
AND BRACKET



SOUTH ELEVATION
1/4"=1'-0" / DETAILS 1"=4'-0"



VISUAL VOCABULARY

THE CITY OF ENCINITAS, CALIFORNIA, HAS REVIEWED THIS DOCUMENT FOR CONFORMANCE WITH THE AMERICAN WITH DISABILITIES ACT (ADA) AND THE CALIFORNIA STATE AND FEDERAL ANTI-DISCRIMINATION LAWS. THE CITY OF ENCINITAS IS NOT PROVIDING A DESIGN OR CONSTRUCTION STANDARD THAT IS MORE RESTRICTIVE THAN THE ADA OR CALIFORNIA STATE AND FEDERAL ANTI-DISCRIMINATION LAWS. THE CITY OF ENCINITAS IS NOT PROVIDING A DESIGN OR CONSTRUCTION STANDARD THAT IS MORE RESTRICTIVE THAN THE ADA OR CALIFORNIA STATE AND FEDERAL ANTI-DISCRIMINATION LAWS. THE CITY OF ENCINITAS IS NOT PROVIDING A DESIGN OR CONSTRUCTION STANDARD THAT IS MORE RESTRICTIVE THAN THE ADA OR CALIFORNIA STATE AND FEDERAL ANTI-DISCRIMINATION LAWS.

McCulley
City of Encinitas

Project: CITY OF ENCINITAS PARKS & RECREATION MOONLIGHT STATE BEACH IMPROVEMENTS

Sheet Title: ENVIRONMENTAL GRAPHICS

NO.	DATE	DESCRIPTION
01	10/17/21	Issue for Review
02	11/16/21	Issue for Review
03	12/01/21	Issue for Review
04	12/01/21	Issue for Review

Project Number: EGD.012

Author: EGD.012

City of Encinitas, California

Exhibit from Applicant