

CALIFORNIA COASTAL COMMISSION

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REGULAR CALENDAR
STAFF REPORT AND PRELIMINARY RECOMMENDATION

Application No.: 6-01-146

Applicant: Santa Fe Christian School

Agent: Chuck Leslie

Description: Demolition of approximately 40,500 sq. ft. of gross floor area of existing classrooms, administration buildings and chapel and construction of approximately 127,000 sq. ft. of gross floor area consisting of classrooms, administration buildings, cafeteria, science building and performing arts center on an approximately 17.19 acre private school site containing classrooms, administrative offices, library/media center, gymnasium, sports fields, and playgrounds.

Lot Area	748,796 sq. ft.
Building Coverage	98,170 sq. ft. (13 %)
Pavement Coverage	177,594 sq. ft. (24 %)
Landscape Coverage	331,810 sq. ft. (44 %)
Unimproved Area	141,222 sq. ft. (19 %)
Parking Spaces	343
Zoning	Medium High Residential
Plan Designation	Medium High Residential
Ht abv fin grade	45 feet

Site: 838 Academy Drive, Solana Beach, San Diego County. APN 298-112-29, -30.

STAFF NOTES:

Summary of Staff's Preliminary Recommendation: Staff is recommending approval of the proposed development with special conditions. Because the project is proposed as a phased development involving numerous structures, the project has been conditioned to require that final, City-approved plans for each of these approved structures be submitted for review of the Executive Director prior to commencement of construction. The issues raised by the proposed development involves visual and public access. To address the visual impacts of the proposed development, the project has also been conditioned to

incorporate and maintain landscaping throughout the development site. Because the proposal involves increasing the existing student population, a condition has been attached which requires that all adverse impacts to traffic generated by the additional students be mitigated through implementation of a traffic management plan. Finally, because the project involves a substantial increase in the amount of impervious surfaces and approximately 51,000 cu. yds. of grading, conditions have been attached requiring the implementation of pre- and post-construction Best Management Practices (BMP's) to assure runoff from the proposed development is appropriately treated and controlled prior to discharge.

Substantive File Documents: Certified County of San Diego Local Coastal Program; City of Solana Beach General Plan and Zoning Ordinance; Final EIR for Santa Fe Christian School Master Plan, SCH #2000111027; City of Solana Beach Case No. 17-00-08 CUP/DRP/PUD/SDP; "Traffic Impact Analysis - Santa Fe Christian Schools Expansion", by Linscott, Law & Greenspan dated March 1, 2001; Letter from Caltrans by Bill Figge, Chief, Development Review and Public Transportation Branch dated May 8, 2001; CDP Nos. 6-83-429, 6-98-136-W and 6-99-158/Santa Fe Christian School.

I. PRELIMINARY STAFF RECOMMENDATION:

The staff recommends the Commission adopt the following resolution:

MOTION: *I move that the Commission approve Coastal Development Permit No. 6-01-146 pursuant to the staff recommendation.*

STAFF RECOMMENDATION OF APPROVAL:

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

RESOLUTION TO APPROVE THE PERMIT:

The Commission hereby approves a coastal development permit for the proposed development and adopts the findings set forth below on grounds that the development as conditioned will be in conformity with the policies of Chapter 3 of the Coastal Act and will not prejudice the ability of the local government having jurisdiction over the area to prepare a Local Coastal Program conforming to the provisions of Chapter 3. Approval of the permit complies with the California Environmental Quality Act because either 1) feasible mitigation measures and/or alternatives have been incorporated to substantially lessen any significant adverse effects of the development on the environment, or 2) there

are no further feasible mitigation measures or alternatives that would substantially lessen any significant adverse impacts of the development on the environment.

II. Standard Conditions.

See attached page.

III. Special Conditions.

The permit is subject to the following conditions:

1. Final Plans. PRIOR TO THE COMMENCEMENT OF CONSTRUCTION of any structure approved pursuant to coastal development permit number 6-01-146, the applicant shall submit to the Executive Director for review and written approval, final site, building and elevation plans for the structure that have been approved by the City of Solana Beach. Said plans shall be in substantial conformance with the plans submitted by HMC Group, dated 11/27/01. In addition, each plan submitted shall include evidence documenting that the Best Management Practices (BMP's) approved in Special Condition #2 of coastal development permit number 6-01-146 that are applicable to the structure will be implemented.

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

2. Drainage and Polluted Runoff Control Plan. PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicant shall submit for the review and approval of the Executive Director, final drainage and runoff control plans approved by the City of Solana Beach, including supporting calculations. The plan shall be prepared by a licensed engineer and shall incorporate structural and non-structural Best Management Practices (BMPs) designed to control the volume, velocity and pollutant load of stormwater leaving the developed site. In addition to the specifications above, the plan shall be in substantial conformance with the following requirements:

- (a) Selected BMPs (or suites of BMPs) shall be designed to treat, infiltrate or filter stormwater from each runoff event, up to and including the 85th percentile, 24-hour runoff event for volume-based BMPs, and/or the 85th percentile, 1-hour runoff event, with an appropriate safety factor, for flow-based BMPs.
- (b) Runoff shall be conveyed off site in a non-erosive manner. Energy dissipating measures shall be installed at the terminus of all outflow drains.
- (c) Drainage from all roofs, parking areas, driveway area, and other impervious surfaces shall be directed through vegetative or other media filter devices

effective at removing and/or mitigating contaminants such as petroleum hydrocarbons, heavy metals, and other particulates.

- (d) Opportunities for directing runoff into pervious areas on-site for infiltration and/or percolation of rainfall through grassy swales or vegetative filter strips, shall be maximized where geotechnical concerns would not otherwise prohibit such use.
- (e) The plan shall include provisions for maintaining the drainage system, including structural BMPs, in a functional condition throughout the life of the approved development. The plan shall include an identification of the party or entity(ies) responsible for maintaining the various drainage systems over its lifetime and shall include written acceptance by the responsible entity(ies). Such maintenance shall include the following: (1) BMPs shall be inspected, cleaned and, when necessary, repaired prior to and during each rainy season, including conducting an annual inspection no later than September 30th each year and (2) should any of the project's surface or subsurface drainage/filtration structures or other BMPs fail or result in increased erosion, the applicant/landowner or successor-in-interest shall be responsible for any necessary repairs to the drainage/filtration system or BMPs and restoration of the eroded area. Should repairs or restoration become necessary, prior to the commencement of such repair or restoration work, the applicant shall submit a repair and restoration plan to the Executive Director to determine if an amendment or new coastal development permit is required to authorize such work.

The permittee shall undertake development in accordance with the approved drainage and runoff control plans. Any proposed changes to the approved drainage and runoff control plans shall be reported to the Executive Director. No changes to the approved plans shall occur without an amendment to this coastal development permit unless the Executive Director determines that no amendment is required.

3. Grading/Erosion Control. PRIOR TO THE ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicants shall submit to the Executive Director for review and written approval, final grading and erosion control plans that have been approved by the City of Solana Beach. The approved plans shall incorporate the following requirements:

- a. All disturbed areas shall be replanted immediately following grading and prior to the beginning of the rainy season.
- b. All permanent runoff and erosion control devices shall be developed and installed prior to or concurrent with any on-site grading activities. All areas disturbed, but not completed, including graded pads, shall be stabilized in advance of the rainy season. The use of temporary erosion control measures, such as berms, interceptor ditches, sandbagging, filtered inlets, debris basins, and

silt traps shall be utilized in conjunction with plantings to minimize soil loss during construction.

d. Landscaping shall be installed on all cut and fill slopes prior to October 1st with temporary or permanent (in the case of finished slopes) erosion control methods. Said planting shall be accomplished under the supervision of a licensed landscape architect, shall provide adequate coverage within 90 days, and shall utilize vegetation of species compatible with surrounding native vegetation, subject to Executive Director approval.

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

4. Landscaping Plan/Deed Restriction. PRIOR TO THE ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicant shall submit for the review and written approval of the Executive Director, a final landscaping plan that has been approved by the City of Solana Beach. Said plan shall be in substantial conformance with the draft landscape plan submitted on November 29, 2001 by Deneen Powell Atelier, Inc., and shall include the following:

- a. A plan showing the type, size, extent and location of all trees on the site, to consist of, at a minimum, large specimen sized trees which when mature will effectively break-up the façade of the chapel/performing arts center, classrooms and gymnasium proposed adjacent to Interstate 5. Special emphasis should be given to retention of all existing mature vegetation located between the campus and Interstate 5 to the maximum extent feasible.
- b. Drought tolerant native or non-invasive plant materials shall be utilized.
- c. A planting schedule that indicates that the planting plan for landscaping adjacent to each proposed new structure shall be implemented within 60 days of completion of each proposed structure.
- d. A written commitment by the applicant that all required plantings shall be maintained in good growing conditions, and whenever necessary, shall be replaced with new plant materials to ensure continued compliance with applicable landscape screening requirements.
- e. Five years from the date of issuance of the coastal development permit, the applicant shall submit for review and written approval of the Executive Director, a landscape monitoring report, prepared by a licensed Landscape Architect or qualified Resource Specialist, that certifies the on-site landscaping is in conformance

with the landscape plan approved pursuant to this Special Condition. The monitoring report shall include photographic documentation of plant species and plant coverage.

If the landscape monitoring report indicates the landscaping is not in conformance with or has failed to meet the performance standards specified in the landscaping plan approved pursuant to this permit, the applicant, or successors in interest, shall submit a revised or supplemental landscape plan for the review and written approval of the Executive Director. The revised landscaping plan must be prepared by a licensed Landscape Architect or Resource Specialist and shall specify measures to remediate those portions of the original plan that have failed or are not in conformance with the original approved plan.

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

5. Traffic Management Plan. Prior to any increase in enrollment above the current enrollment of 750 students at the Santa Fe Christian School, the applicant must submit a traffic management plan approved by the City of Solana Beach for review and approval by the Executive Director. The plan shall be consistent with the conceptual traffic management proposals dated December 21, 2001 and January 15, 2001 and prepared by Chuck Leslie for Santa Fe Christian School. The traffic management plan shall require that at least two-thirds of the number of students by which the total school enrollment exceeds 750 will be bussed to school. In addition, the plan shall specify what additional traffic management measures will be taken to assure that any increases in enrollment will have no impact on traffic at the I-5/Lomas Santa Fe Drive intersection or along Lomas Santa Fe Drive west of the I-5. The plan shall also document measures for monitoring enrollment to assure compliance with the traffic management plan.

The permittee shall undertake development in accordance with the approved traffic management plan. Any proposed changes to the approved traffic management plan shall be reported to the Executive Director. No changes to the approved plans shall occur without an amendment to this coastal development permit unless the Executive Director determines that no amendment is required.

6. Disposal of Graded Spoils. PRIOR TO THE ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicant shall identify the location for the disposal of graded spoils. If the site is located within the coastal zone, a separate coastal development permit or permit amendment shall first be obtained from the California Coastal Commission or its successor in interest.

7. Chapel/Performing Arts Center. Use of the proposed Chapel/Performing Arts Center shall be limited to uses related to the education of the students of Santa Fe

Christian School only. Any use unrelated to the education of the students will require an amendment to this permit or a new coastal development permit.

8. Sewer Main Improvements. Prior to any increase in enrollment above the current enrollment of 750 students at the Santa Fe Christian School, the applicant must provide certification from the City of Solana Beach for Executive Director review and written approval that adequate sewer main improvements within Valley Avenue have been installed and function to support the additional students and that all necessary permits or approvals have been granted from the Coastal Commission for the sewer main improvements within Valley Avenue.

IV. Findings and Declarations.

The Commission finds and declares as follows:

1. Detailed Project Description/History. The proposed development involves the demolition of approximately 40,000 sq. ft. of existing classrooms, administrative offices, chapel, and removal of an existing approximately 70 ft.-high microwave communications tower, approximately 51,000 cu. yds. of grading and the construction of approximately 127,000 sq. ft. (gross floor area) of structures including classrooms, administrative offices, cafeteria, science building, gymnasium, a 700 seat chapel/performing arts center and 127 parking spaces at the site of an existing private school. The existing approximately 17.19 acre school site consists of classrooms, offices, library/media center, chapel, gymnasium, two sport fields, playgrounds and approximately 216 parking spaces to serve an existing K-12 student enrollment of up to 750 students. Many of the structures used as classrooms today were built in the 1950's or before and are in need of upgrade or replacement to adequately serve the student enrollment. In addition to the proposed structures, the applicant is also proposing to increase the student enrollment from the existing 750 students to a maximum of 840 students.

The applicant is proposing to phase-in the construction of the various new structures over time so as to not affect the ongoing operation of the school. The first phase of the development involves the construction of a two-story approximately 7,128 sq. ft. science building. Although the site plan and elevation plans for each of the proposed structures have been identified on preliminary plans, the detailed final plans have not been submitted. Therefore, Special Condition #1 requires that prior to commencement of construction of any proposed structure, the applicant must submit final, City-approved plans for Executive Director review.

The proposed development represents the first phase of a larger redevelopment of the entire campus facility. Ultimately the applicant will be proposing additional classrooms and facilities in order to accommodate future enrollment of up to 1,200 students. However, the applicant is aware that the roadway system at the nearby Lomas Santa Fe Drive and I-5 interchange is currently operating at a substandard level of service (LOS) and would not accommodate an increase of enrollment at this time. Therefore, until future planned improvements occur at the Lomas Santa Fe Drive and I-5 interchange, the

applicant is limiting its development request to structures that are designed to accommodate current students along with up to 90 additional students.

The proposed development site contains an existing K-12 educational facility consisting of structures many of which predate the Coastal Act. The Commission has approved various additional developments on the site since implementation of the Coastal Act of 1976. These include: conversion of library/classroom building to chapel in 1978 (F7429/Scott Memorial Baptist Church); construction of modular classrooms, gymnasium, playground and parking lot area in 1983 (6-83-429 and 6-83-429-A1 to A4/SFCS); installation of modular classrooms and restroom facility in 1998 (6-98-136-W/SFCS); and demolition of a library/counseling building, construction of library/media center, parking and four modular classrooms in 1999 (6-99-158 and 6-98-158-A1/SFCS). Several of the permits or amendments were conditioned to include erosion control measures and, more recently (CDP #6-99-158), the implementation of BMP's to protect water quality.

The project site is located adjacent to the west side of Interstate 5, approximately 2 blocks south of Lomas Santa Fe Drive and east of Academy Drive in Solana Beach. The location is approximately 1 mile east of the shoreline. The subject site is designated by the City and (prior to City incorporation in 1986) the previously applicable County of San Diego ordinances as lying within a residential zone (Medium-High Residential). However, as cited above, the site has been used as a private education facility since the 1960's and private schools are allowed in the residential zone subject to approval of a conditional use permit such as that approved by the City. The site is surrounded by various uses including Interstate I-5 to the east, a shopping center on the north side, Stevens Creek and office complexes to the west and single-family residences and commercial structures to the south.

The project site is located within an area that was previously covered by the County of San Diego's Local Coastal Program (LCP). However, the County LCP was never effectively certified and is now used for guidance with Chapter 3 Policies of the Coastal Act used as the standard of review.

2. New Development. Section 30250 of the Act states, in part:

- (a) New residential, commercial, or industrial development, except as otherwise provided in this division, shall be located within, contiguous with, or in close proximity to, existing developed areas able to accommodate it or, where such areas are not able to accommodate it, in other areas with adequate public services and where it will not have significant adverse effects, either individually or cumulatively, on coastal resources.

Section 30250 is intended to prevent significant new development from occurring in areas without adequate public services. As previously discussed, the proposed development is a renovation and expansion of an existing private school facility which predates the Coastal Act. While the use pre-existed both the Coastal Act and the

incorporation of the City of Solana Beach (1986), the City has monitored the use of the site through the application of conditional use permits for new development on the site. In approving the proposed development, the City identified the construction of the proposed improvements would not effect existing public services. However, the City approval also identified that the introduction of an additional 90 students on the site could not be accommodated by the existing sewer system and would have an adverse impact on traffic in the area. (Note: section #3 of this staff report discusses the potential adverse traffic impacts associated with the addition of 90 students.) Specifically, the City's approval prohibits an increase to the existing student enrollment of 750 students until an expanded sewer main within Valley Avenue, south of the project site, is permitted and installed.

In review of the City's Sanitary Sewer Master Plan dated May 14, 2001, Commission staff has determined that the proposed installation of a larger sewer main within Valley Avenue is an element of the Sewer Master Plan which has been design to accommodate ultimate build-out of the City. The City has determined that once the planned for sewer main is installed in Valley Avenue, public services will exist to adequately serve the additional students as well as other planned development in the community.

However, because the City indicates that the addition of 90 students cannot be accommodated by existing services, the City has conditioned the project to not allow an increase in enrollment until the sewer upgrade has occurred. Special Condition #8 mirrors the City's condition and limits the student enrollment to its existing level of 750 students until the new sewer main has been installed within Valley Avenue. Although an expansion of the size of the sewer main over what it is existing is considered new development requiring a coastal development permit, the City has not yet applied for a coastal development permit for its construction. While it is anticipated that the City will submit an application in the next few months, the installation of a new sewer main does not appear to raise any coastal resource issues since all improvements will occur within the public street or public easement which do not contain coastal resources such as environmentally sensitive habitat. However, until the Commission has an opportunity to review and approve the sewer main improvements, existing services for the 90 additional students are not available. Therefore, only as conditioned is the proposed development consistent with Section 30250 of the Coastal Act.

3. Public Access/Recreation. Section 30252 of the Act states:

The location and amount of new development should maintain and enhance public access to the coast by (1) facilitating the provision or extension of transit service, (2) providing commercial facilities within or adjoining residential development or in other areas that will minimize the use of coastal access roads, (3) providing nonautomobile circulation within the development, (4) providing adequate parking facilities or providing substitute means of serving the development with public transportation, (5) assuring the potential for public transit for high intensity uses such as high-rise office buildings, and by (6) assuring that the recreational needs of new residents will not overload nearby

coastal recreation areas by correlating the amount of development with local park acquisition and development plans with the provision of onsite recreational facilities to serve the new development.

The subject development site is located approximately two blocks south of the intersection of Lomas Santa Fe Drive and Interstate 5 approximately 1 mile inland from the shoreline. Because of the distance from the beach, the streets surrounding the existing campus are not currently used for parking by the beachgoing public. While the applicant is proposing to add approximately 127 onsite parking spaces to the campus as part of the subject development, any street parking resulting from the new development would not adversely affect public access to the shoreline. However, nearby Lomas Santa Fe Drive is the only major east/west coastal access route that leads directly to the shoreline within Solana Beach. As such, traffic congestion on this roadway and the I-5/Lomas Santa Fe Drive interchange has the potential to affect public access to the coast.

The proposed development involves a major redevelopment of an existing K-12 school resulting in approximately 86,500 gross sq. ft. of new classrooms, cafeteria, offices, gymnasium and chapel/performing arts center. In addition, the applicant proposes to increase the existing student enrollment by an additional 90 students resulting in a total maximum student enrollment of 840 students. Because of the close proximity to Lomas Santa Fe Drive, the City's primary coastal access route, the increase in student enrollment may have an adverse affect on the public's ability to get to the beach utilizing Lomas Santa Fe and Interstate 5. In a letter of comment on the subject development's EIR, the Department of Transportation (Caltrans) recommends against any increase to the student population at this time.

Because of the already unacceptable levels of service at the I-5 northbound and I-5 southbound ramps at Lomas Santa Fe, Caltrans recommends against increasing the student enrollment until the interchange improvements at Lomas Santa Fe have been made. (Letter from Bill Figge, dated May 8, 2001).

The traffic study prepared in 2001 for the subject development identifies several roads/intersections leading to and from the school that currently operate at a substandard level of service. These include the north and southbound ramps at Lomas Santa Fe Dr. and I-5 and Stevens Avenue, a collector street that lies between the school and Lomas Santa Fe Drive. The traffic study identifies these road/intersections as currently operating at a Level of Service (LOS) D and E throughout the day. In addition, the traffic study identifies that Interstate 5 both north and south of Lomas Santa Fe is currently operating at LOS F. The City's Circulation Element identifies the goals for streets and roadways as follows:

Maintain a minimum LOS C at all intersections during non-peak hours and LOS D (volume/capacity ratio of 0.90 or less) at all intersections during peak hours and LOS D for I-5 as an element of the Regional Transportation Plan (RTP) to ensure that traffic delays are kept to a minimum.

Based on the applicant's traffic analysis, the LOS at the intersection of I-5 and Lomas Santa Fe, along I-5 and on Stevens Avenue exceeds the minimum LOS service for non-peak hours as well as during peak hours. Thus, existing conditions are inadequate to meet the minimum standards cited in the City's Circulation Element.

As noted above (see Section 2 of staff report), Section 30250(a) of the Act requires that new development be located in areas with adequate public services such that it will not have adverse effects on coastal resources. While the subject development is proposed in an already developed area, based upon review of the applicant's traffic analysis, it appears that the Lomas Santa Fe/I-5 interchange and Stevens Avenue are not currently meeting acceptable traffic standards. What this means is that these road segments and intersections are highly congested which results in traffic delays (the City is currently planning and seeking funding for improvements to the I-5/Lomas Santa Fe Drive interchange in order to alleviate this congestion). Thus, traffic congestion is occurring that also affects the ability of the public to access the beach west of the I-5/Lomas Santa Fe Drive intersection. The traffic analysis performed for the subject development proposal indicates that existing conditions have already exceeded minimum LOS D for peak hours. Therefore, the proposed increase in student enrollment may result in a change in the existing LOS or, at a minimum, will add to congestion on streets and roadways that are already operating at levels below the City's traffic standards. Because, Lomas Santa Fe Drive is the primary access corridor for public access to the shoreline in Solana Beach, this increase in traffic will have an adverse affect on the public's ability to access the beach.

In approving the proposed development, the City also recognized the potential adverse effects to traffic from adding additional students to the campus. As such, the City's approval was conditioned on submission and approval of a traffic management plan that "demonstrates that all traffic generated by up to 90 students has been mitigated to a zero impact . . .". To date this plan has not been approved by the City. However, the applicant has submitted a conceptual plan to the Commission for its review. The plan proposes that a minimum of 60 of the 90 additional students be bussed to and from the campus by way of Via De La Valle, the first exit of Interstate-5 south of Lomas Santa Fe Drive. The applicant determined that approximately 2/3 of the existing student population live north or east of the campus and, thereby, likely use Lomas Santa Fe Drive as an access route to the campus. Therefore, the traffic management plan assumes that approximately 2/3 of new students will also come from areas north and east of the campus. However, because the objective of the transportation plan is that there be no impacts to traffic along Lomas Santa Fe Drive at Interstate-5, the plan also proposes that whenever the existing number of students living north or east of the campus is exceeded, any new students from those areas must also take the bus to campus. The applicant has documented that 599 students currently live north and east of the campus. At a minimum, therefore, 60 of the new students will be bussed by way of Via De Valle. If any of the remaining 30 new students live north and east of the campus, they will also be required to be bussed, if their number exceeds current levels of students living north and east of the campus (i.e., exceeds 599 students). Special Condition #5 requires the applicant to submit a traffic management plan similar to that described above which has

been approved by the City of Solana Beach. The condition also requires that any change to the plan will require an amendment to this subject permit. In this way, the Commission can be assured that the addition of 90 students will have no adverse impact on the public's ability to access the coast.

In addition to the impacts associated with adding 90 students, opponents to the project have objected to the construction of the 700-seat chapel/performing arts center. They contend that the chapel/performing arts center will be a "state of the art" performance complex which could be used for public events not associated with the educational facility. As such, they contend that adverse traffic impacts beyond that generated by the operation of the school will occur. The applicant has identified that the facility is similar in size to drama/performing arts centers on other San Diego County high school campuses. These objections were presented to the City during its review of the subject development. As a result, the City conditioned its approval by limiting the use of the chapel/performing arts center to the educational use of the facility by Santa Fe Christian School. Similarly, Special Condition #7 prohibits uses of the facility other than that associated with the school. In this way, the Commission can be assured that use of the facility will not result in additional impacts to traffic congestion at the Lomas Santa Fe Drive and I-5 intersection and, thereby, will not have an adverse impact on the public's ability to access the shoreline.

The project site is not within walking distance of the beach and there are no major public recreational facilities in the area which could be impacted by an "over-flow" of cars from the development. The applicant is also proposing a traffic management plan which when implemented will result in no additional traffic impacts from the proposed development. Therefore, as conditioned, the project will not have an adverse impact on public access or recreation, and the Commission finds that the project is consistent with Sections 30250 and 30252 of the Coastal Act.

4. Visual Resources. Section 30251 of the Coastal Act states, in part that:

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

The proposed development involves the construction of approximately 127,000 sq. ft. (gross floor area) of structures including classrooms, administrative offices, science building, gymnasium that will be up to 35 feet in height above the existing grade and a 700 seat chapel/performing arts center that will be approximately 45 feet in height above the existing grade.

The existing school facility is located approximately one mile inland of the shoreline immediately west of Interstate I-5 on an approximately 17.19 acre site that does not

contain natural grades. The EIR for the proposed development describes the site as having a "stepped appearance". The elevation of the site ranges from approximately 80 feet above Mean Sea Level (MSL) on its southwest corner where a sports field is located to approximately 155 ft. above MSL on its eastern side where most of the existing and proposed structures are to be sited. In addition, the overall site sits at an elevation over 20 to 40 feet higher than the elevation of development that surrounds the site on its east, north and west sides. Therefore, views of the existing and proposed development from those areas will be limited to structures located near the east, north and west perimeters of the site. Some views across the campus will, however, exist along Academy Drive on the south side of the campus where residences and a few commercial businesses are sited. In the case of motorists on I-5 and residents east of the campus, sections of the new structures, especially the approximately 45 ft. high chapel/performing arts center and approximately 35 ft. high classroom buildings and gymnasium will be much more pronounced and visible than the existing single-story structures that exist today, especially since the appearance of the existing single-story structures are effectively masked by extensive mature vegetation. In addition, I-5 throughout the City of Solana Beach is designated as a major coastal access route and scenic highway in the previously applicable County of San Diego Local Coastal Plan (LCP) which the Commission uses as guidance for development within the City of Solana Beach. However, there are no existing public views of the ocean or coast available across the development site from any vantage point, and, therefore, public views of the ocean or coastline will not be adversely affected by the height of the new structures alone. However, the scenic character along this section of I-5 will be affected by the more obtrusive and pronounced structures.

The bulk and scale of the proposed development does raise a question as to its compatibility with the surrounding community. As previously cited, a private school has been located on the subject site since at least the 1960's. In addition, the applicant asserts that the proposed development has been designed primarily to replace old classrooms, offices and a chapel with larger and modern facilities to serve existing students and up to 90 new students. Therefore, while the size and number of campus buildings will increase, the use of the site remains the same. The bulk and scale of the new structures also will generally be compatible with surrounding development since most of the development site is not visible from the surrounding community. The project site is surrounded on its east, north and west sides by manufactured steep slopes that lead down approximately 20 to 40 feet to neighboring commercial developments and I-5. The south side of the project site consists of cut slopes that transition to Academy Drive on its south side with commercial and residential development. An approximately 255,000 sq. ft. shopping center with structures extending up to 60 feet in height is located on the north side of the project site and Stevens Creek runs along the west and northwest side of the site. However, adjacent to the west side of Stevens Creek are two, two-story office buildings (with associated parking lots) that total approximately 94,000 gross square feet. Because the existing school facility is set on an elevation above Interstate 5, the shopping center to the north and the office buildings to the west, most views of the school facility are not available or are significantly reduced. However, even though the elevational difference of the development substantially reduces the increased bulk and scale impacts

associated with the proposed development, if the development site was at the same elevation as surrounding development, the bulk and scale of the development would still be consistent with surrounding developments since those developments include the existing school, a large shopping center, commercial buildings and residences.

Again, the main concern, from a visual resource standpoint, relates to the "imposition" of these large structures into the I-5 viewshed. While no views of the ocean will be affected, the proposed large close to the freeway will stand out and adversely affect the character of the area as viewed from I-5. However, to mitigate the overall visual effect of the new structures (such as the 45 ft. high chapel/performing arts center), the applicant is proposing to landscape the development site to effectively screen the structures using existing mature vegetation and new specimen sized trees and landscaping. In addition, the applicant proposes to remove an existing approximately 70 ft.-high microwave communications tower located on the northeast corner of the subject lot and relocate the facilities antennae into the facades of one of the new buildings. Because the proposed development represents a substantial increase in the bulk and scale over that which currently exists on the site, the Commission believes that adequate landscaping around the structures will effectively mitigate any potential adverse impact the structures may have on the surrounding community or along I-5 which has been previously designated as a scenic highway in the County of San Diego LCP. Therefore, Special Condition #4 has been attached which requires the applicant to submit final, City-approved landscaping plans for the project that includes the incorporation of all existing mature vegetation to the maximum extent feasible as well as the use of new large specimen sized trees and vegetation that will serve to effectively mask the visual effects of the structures.

Therefore, while no public views to coastal resources will be affected by the proposed development and the bulk and scale of the proposed development is consistent with surrounding community, the development will be substantially landscaped to mitigate any potential adverse impact that structures may have on the visual character of the area, especially as seen by motorists along Interstate 5. Therefore, the Commission finds that the proposed development is consistent with Section 30251 of the Coastal Act.

5. Resource Protection/Water Quality. Section 30231 of the Act states:

The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface water flow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.

The proposed development will occur within an existing approximately 17.19 acre private K-12 grade school campus that consists of varied classroom/administrative structures occupying approximately 34,182 sq. ft., approximately 35,640 sq. ft. of paved

areas, and several sports fields. Therefore, the current amount of impervious surfaces is estimated to be 69,822 sq. ft. The proposed development involves the replacement of old classrooms, administrative offices and a chapel and construction of an additional gymnasium and chapel/performing arts center with additional parking areas. As a result, the applicant indicates that the resulting final development will result in approximately 266,764 sq. ft. of impervious surfaces. In addition, the proposed development involves approximately 51,000 cu. yds. of grading to accommodate the new development.

Existing runoff from the approximately 17.19 acre campus discharges via catch basins and concrete swales into storm drains under Academy Drive which empties into Stevens Creek which borders the west side of the project site. Although Stevens Creek itself is not a pristine, natural creek, polluted runoff entering the channel could harm any vegetation growing in the channel downstream, and will eventually reach San Dieguito Lagoon, which is connected to the ocean. Therefore, run-off from the proposed development could adversely impact both Stevens Creek and San Dieguito Lagoon downstream if the run-off contains pollutants, silt or soils. Unprotected and exposed graded areas could result in soil and sediment entering into the coastal waters during storms or as a result of landscape watering. In addition, the runoff from proposed parking areas is likely to contain oil, grease and other hydrocarbons as a result of the cars parking there. These pollutants can be trapped and removed from run-off by the use of filtering devices and other control measures. With regular maintenance (e.g. cleaning and replacing of the filters), the filters can keep pollutants from the parking lot from being carried into Stevens Creek. In addition, runoff from the proposed classrooms, administrative offices, chapel/performing arts center and gymnasium is proposed to be directed into existing onsite storm drains via gutters and new drains. Such runoff is likely to contain particles of roofing material or other debris. These pollutants can be also be trapped and removed by the use filtering devices such as grassy swales, landscaping or drain filters.

The applicant has prepared a storm water pollution control program containing Best Management Practices (BMPs). The program proposes approximately 124,480 sq. ft. of new landscaping, installation of fossil filters at all parking lot catch basins, installation of a storm water interceptors to filter runoff prior to its entering the public storm drain system, grass lined swales and modification of an existing baseball field to function as a grass lined detention basin to contain storm water runoff over and above that generated from current site conditions. The applicant is also proposing to monitor the BMP's on a regular basis to assure they are functioning as designed.

Special Condition #2 is intended to assure that the proposed BMP program is implemented and maintained. Full implementation of the proposed BMP program should not only mitigate for any water quality impacts associated with the renovation and expansion of the school facility, but will also improve the quality of surface runoff leaving the already developed portions of the site. Special Condition #2 requires the applicant to implement a polluted run-off control plan that will filter and minimize contaminants (petroleum hydrocarbons and heavy metals) from entering coastal waters. In addition, the applicant is required to maintain the polluted run-off system to ensure

that debris and other pollutants are removed on a regular basis and especially prior to the onset of the rainy season (October 1st). In addition, Special Condition #3 has been attached requiring the applicant to submit a drainage and erosion control plan to prevent graded areas from remaining exposed or unplanted without erosion control measures. Because the applicant has not identified the location of any proposed exported graded materials (approximately 21,000 cu. yds.), Special Condition #6 has also been attached requiring the applicant to identify the disposition site and notifying the applicant that if the export site is in the Coastal Zone that the disposition requires a coastal development permit. The Commission's water quality staff has reviewed the applicant's proposed BMP's and, along with the proposed special conditions, concur that the BMP's will adequately mitigate any potential adverse water quality impacts from the proposed development. With these conditions, the Commission is assured that all runoff generated by the proposed development will be treated to the extent feasible. Therefore, as conditioned, the proposed development will not result in adverse impacts to the biological productivity or quality of coastal waters, and the project is consistent with Section 30231.

6. Local Coastal Planning. Section 30604(a) also requires that a coastal development permit shall be issued only if the Commission finds that the permitted development will not prejudice the ability of the local government to prepare a Local Coastal Program (LCP) in conformity with the provisions of Chapter 3 of the Coastal Act. In this case, such a finding can be made.

The site is zoned and designated Medium High Residential in the City of Solana Beach General Plan and Zoning Ordinance, and Medium High Residential in the previously certified County of San Diego Local Coastal Program, which the Commission uses for guidance in review of development in the City of Solana Beach. With the approval of a conditional use permit, the proposed project is consistent with these designations. The site is not located within any of the special overlay designations contained in the certified County LCP. As conditioned, the proposed project is consistent with all applicable Chapter 3 policies of the Coastal Act. Thus, the proposed development will not prejudice the ability of the City of Solana Beach to prepare a certifiable local coastal program.

7. California Environmental Quality Act (CEQA). Section 13096 of the Commission's Code of Regulations requires Commission approval of Coastal Development Permits to be supported by a finding showing the permit, as conditioned, to be consistent with any applicable requirements of the California Environmental Quality Act (CEQA). Section 21080.5(d)(2)(A) of CEQA prohibits a proposed development from being approved if there are feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse effect which the activity may have on the environment.

The proposed project has been conditioned in order to be found consistent with the water quality protection, public access, and visual policies of the Coastal Act. Mitigation measures that include the use of Best Management Practices to filter polluted runoff, and a traffic management plan to maintain existing levels of traffic generated by the campus,

will minimize all adverse environmental impacts. As conditioned, there are no feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse impact which the activity may have on the environment. Therefore, the Commission finds that the proposed project is the least environmentally-damaging feasible alternative and is consistent with the requirements of the Coastal Act to conform to CEQA.

STANDARD CONDITIONS:

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

NORTH



PACIFIC OCEAN

SITE

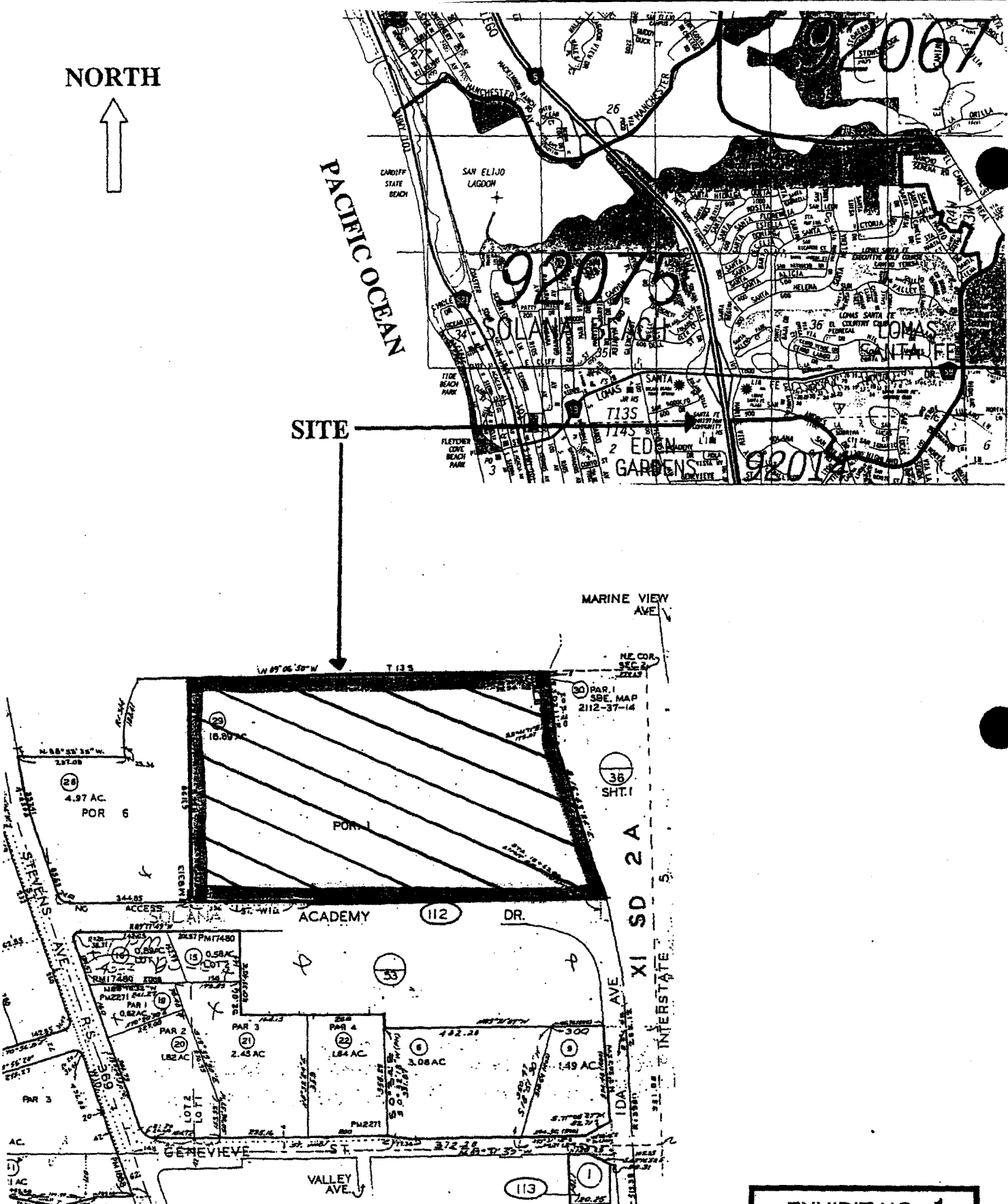


EXHIBIT NO. 1
APPLICATION NO.
6-01-146
Location Map

RECEIVED






JAN 08 2002

Santa Fe Christian Schools

CALIFORNIA
COASTAL COMMISSION
SAN DIEGO COAST DISTRICT

CAMPUS MAP
As Of:

OCT 2001

-  = Public Restroom
-  = First Aid - Nurse
-  = Handicapped Parking
-  = Admin Offices
-  = Maintenance

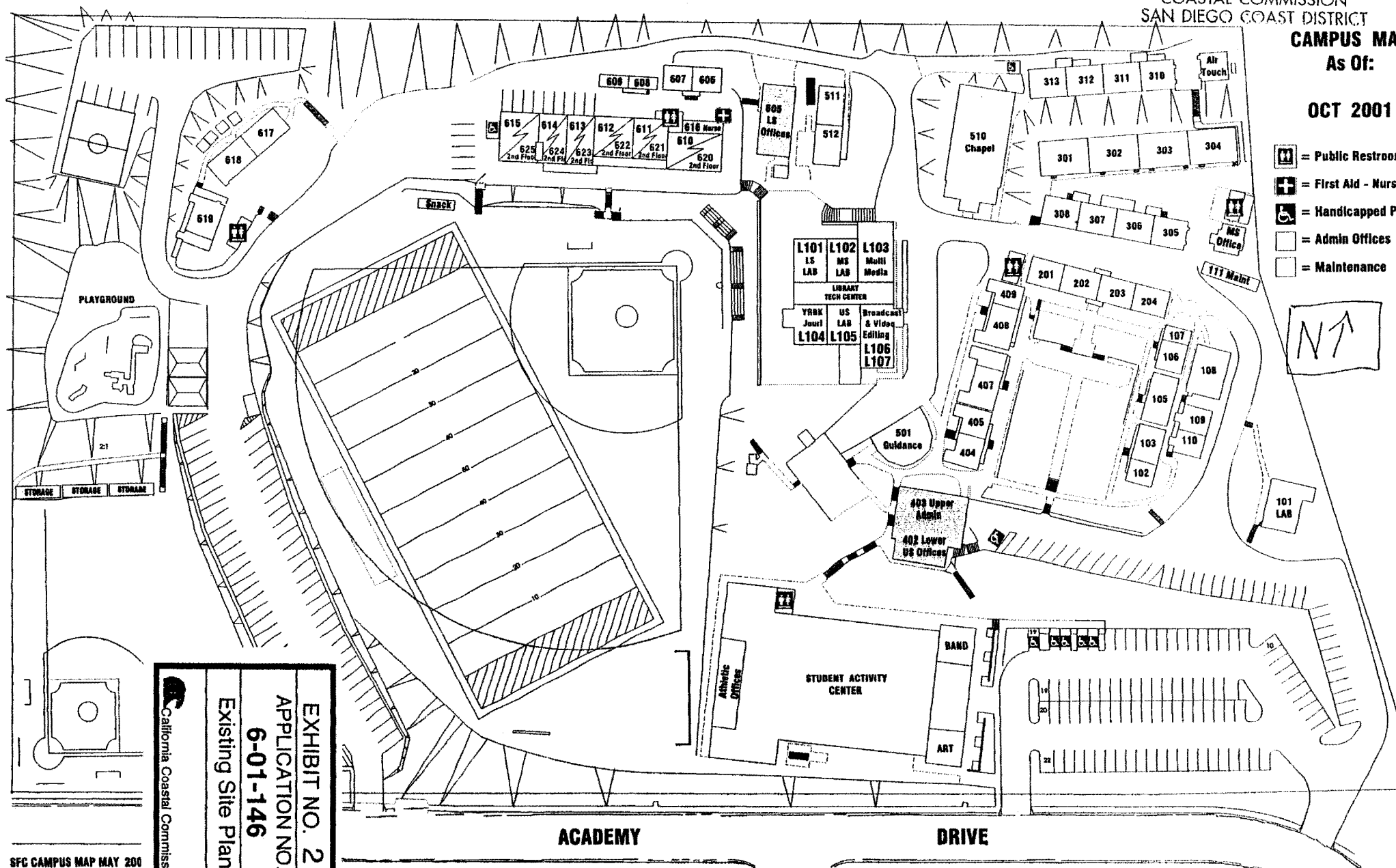
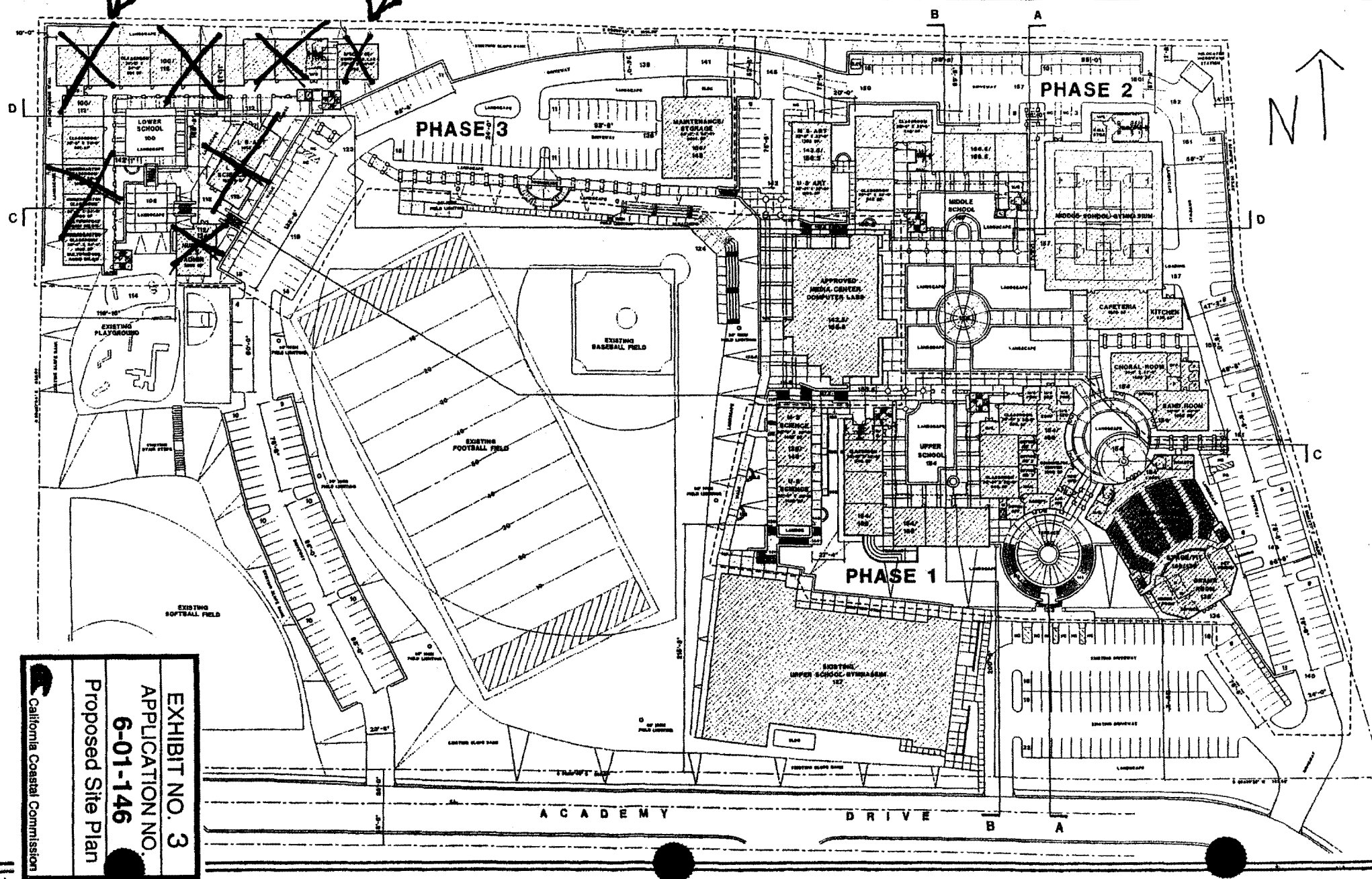


EXHIBIT NO. 2
APPLICATION NO.
6-01-146
Existing Site Plan
California Coastal Commission

Redevelopment of this northwest corner of the campus is not part of the subject application.



October 26, 2001

Mr. Gary D. Cannon
Coastal Program Analyst II
California Coastal Commission
7575 Metropolitan Drive, Suite 103
San Diego, California 92108

RECEIVED
OCT 29 2001
CALIFORNIA
COASTAL COMMISSION
SAN DIEGO COAST DISTRICT

Re: File # 6-01-146
Sante Fe Christian School Application


Dear Mr. Cannon:

Enclosed please find statement signed by my neighbors whose homes and yards face the proposed project (and attachments). One of the homeowners who have signed the statement, live across the street, facing north. They, too, are disturbed by the noise from the school which is audible in the street and in the homes on the opposite side of the street. The objections enumerated in the statement are present objections to the adverse effects to neighbors, our neighborhood and the area from the operation of the applicants, before the project proposed has even begun.

Since and before this date, the operators and applicant, Sante Fe Christian School have continuously ignored and violated the conditions of approval of their various conditional use permits and ordinances of the City of Solana Beach. For example, Resolution No. 93-30, (1993) recites that modular buildings were built without the benefit of building permits; the school was to utilize a football field for overflow parking and under that Resolution, they were to obtain the required permits, pay penalty fees and construct a traffic signal at Academy Drive. As of this date, the Sante Fe Christian School has not complied with these conditions, including the traffic signal, or screening structures from public view and the view from Highway 5 of antennas, a leased microwave cell tower and other buidings and structures.

Succeeding conditional use permits granted in 1996, 1998, etc., have been violated with the construction of at least two identified structures without plans, review and permits, and violations of noise, illegal parking of vehicles, etc.

With regard to addtional approvals under their current application, the EIR fails to address traffic from the daily use, seven days a week of fields and facilities of the school. A letter to the City of Solana Beach from the school states that they have joint use agreements with 20 other organizations and plan to increase the number of those agreements, for the use of their facilities. Additionally, the school operates a pay- for- attendance theater group (\$25.00 to \$30.00 a ticket) listed to their address in the telephone directory at

EXHIBIT NO. 4
APPLICATION NO.
6-01-146
Letters of Objection
 California Coastal Commission

Academy Drive, with a ticket office number in El Cajon. Their ticket sales for seats average 700 or more per performance. The 60' Performing Arts Theater proposed at the Academy Drive location would operate year around creating traffic and noise, resulting in interference with the peaceful enjoyment of residents' homes, and increased traffic during Del Mar Fairgrounds events.

The Stevens Creek, adjacent to the property, is home to native vegetation, herons, cranes, owls, possums, racoons - many species of birds and animals. Stevens Creek is a tributary to the wetlands and lagoon in Del Mar. A serious threat to this environmentally sensitive natural ecosystem is posed by any further development, degrading and deterioration of the subject property and area.

We ask the Commission to :

1. Physically inspect the existing buildings and structures (permitted and otherwise) to determine the accurate square footages involved and the conditions now existing and,
2. Reject the application for the reasons both stated and observable.

Thanking you for your work of inestimatable importance in protecting the people and the environment of the coastal area, I am,


Norma Ruhm

encls

10/26/01


Dear Mr. Cannon:

Yesterday, while in my backyard, I noticed another "hole" in the trees in the area of Stevens Creek. Later that day, I drove to the Sante Fe Christian School site to determine the source of loud referee whistles. While in the location, I drove to the American Assets buildings parking area (south end) and observed that a trees had recently been chopped down on the far side of the Creek. I learned that American Assets has removed many trees and native grasses, vegetation. One stump of a tree appeared freshly chopped.

Is there nothing that can be done about this devastation around the Creek, including a path which is used from the shopping area past the Creek? Would you please advise me what other agencies may be contacted and advised about the relentless destruction of this area?

The area where the office builidngs are proposed by American Assets has definitely been disturbed in advance of Coastal approval.

Thank you,



Norma Ruhm
858 755-0486

RECEIVED

OCT 29 2001

CALIFORNIA
COASTAL COMMISSION
SAN DIEGO COAST DISTRICT

TO: California Coastal Commission
1575 Metropolitan Drive Suite 103
San Diego, Ca. 92108

Re File # 6-c1-146

ATTN: Gary D. Cannon
Coastal Program Analyst II

The undersigned taxpaying residents whose neighboring homes, yards and streets are currently being adversely affected by the noise, and traffic impacts from the Sante Fe Christian School, are opposed to the 3 year Sante Fe Christian School Master Plan for the demolishment of all existing structures (except for the upper school gymnasium and the library/media center lab) and the construction of 145,526 additional gross square feet for a total gross square footage of 179,708 square feet. (Reference, EIR, Sante Fe Christian School). The site is zoned residential.

For comparison purposes, the major supermarket in Solana Beach is Von's Supermarket which is east of the I-5, Lomas Sante Fe interchange. Von's gross square footage is 50,000 square feet. The proposed development under this Master Plan is more than 3.6 times (360%) the size of this commercially zoned supermarket.

The EIR totally fails to describe the homes and area to the southwest of the project site. Homes on Sonrisa Street, Fresca Street, Fresca Court and residences to the south are totally excluded in relation to significant impacts. These homes are on a rim above the site and closer to the site than homes on Nardo described in the EIR. Loud noises, whistles (referees) shouts, screams, etc., impact this area morning and late afternoon every day of the week (including weekends) and are audible in the backyards and streets outside, disturbing the peaceful enjoyment and quiet of the homes, backyards, streets and the neighborhoods. Microphones and loudspeakers have been used on weekends for hours.

Traffic and parking are heavily impacted by the current enrollment and facilities at this site. The interchange at I-5 and Lomas Sante Fe is at level F. The General Plan of Solana Beach allows a maximum of level D. The EIR used a 2.0 second delay for its analysis. This figure was taken from a "Final (working) Draft" by SANTEC/ITE. This guideline was not approved by the agency preparing it (a draft) nor any other agency, nor this City (SB). One of the review team to this Draft was Mr. Bill Figge, Chief, State Clearinghouse for the State Department of Transportation. In Mr. Figge's report (EIR), he states, "... Caltrans recommends against increasing the student enrollment..." and "Allowing projects to add up to 2.0 seconds of delay removes any cushion in the event of system breakdown."

YARD The site is in a Hillside Overlay Zone, on an inland bluff and is adjacent to the Stevens Creek. The site viewed from above is a visual blight. Since the school's occupation, the site has been scraped and graded and degraded of natural vegetation and trees. Most recently, 25,000 cubic of fill was given to the school from the undergrounding of the railtracks and used on the property. The EIR states that new paved areas will add 165,954 square feet of paving for a total of 201,594 square feet of paving. Erosion is evident on areas that have been denuded and runoff from parking lots, etc. will increase.

The project proposal is to build a 700 seat Performing Arts Center. By comparison, the North County Repertory Theater in a commercial zone has only 194 seats. The Globe theater (downtown San Diego) has less seating capacity. The maximum height allowed in the site's zone is 30 feet (35 feet for civic use with City Council approval and findings). Other proposed structures (e.g. a cafeteria) exceed the maximum height for the zone.

The site is used for private, nonsecular purposes. None of the proposed development is either coastal related or of public benefit. The property is valued at 8,000,000. dollars but pays no property taxes. All of the services provided from taxpayers and all the infrastructure costs are the burden of taxpaying residents for the use of this property. Of the current enrollment of 718 students (750 is currently allowed under a conditional use permit) only 38 students live in Solana Beach, or 7%.

In November, 2000, the voters of Solana Beach approved a citizens' initiative, Prop T., (now Ordinance 266) the Solana Beach Community Protection Act. The ballot proposition states, "Shall the people adopt an initiative measure, also known as the "Community Protection Act" to require voter approval to change, alter or increase General Plan Land use categories, with the exception of changes to land already designated residential that clearly result in a reduction of intensity or density?". The City Council has refused to place this project on the ballot for the vote of the people.

The residents undersigned, strongly object to project proposed and the further intensity and density in use on this site zoned residential use. We also petition for the right to vote under Ordinance 266.

Michael Davidson

David C. Minton III

Karen G. Glass
John O'Byrne

Margaret Duffy Serron
Margaret Duffy-Serron

Jan Schuler
John Schuler
Randy & Mary Smith
Mary E Smith

Jay McMurphy

Marilyn C. Minton

Therese A. Conlin
(Therese Conlin)

Steven R. Rhee
John H. Howard
Jay McMurphy

Jan Schuler
Jan Schuler
Dawn Hedding

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Norma J. Goodright

Paul K. Arian

R. D. [Signature]

Joyce A. Damm

[Signature]

Kathleen M. Arian

Reynolds Botello