CALIFORNIA COASTAL COMMISSION
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RECORD PACKET COPY **Th7b**

July 24, 2002

TO: Commissioners and Interested Parties

FROM: Charles Lester, Acting District Director C.T.L. 7/25/02
Steve Monowitz, Coastal Planner

SUBJECT: **SAN LUIS OBISPO COUNTY LOCAL COASTAL PROGRAM MAJOR AMENDMENT NO. 3-01: Cambria Elementary Site Designation**. For public hearing and Commission action at its meeting of August 8, 2002 to be held at the Embassy Suites Hotel (333 Madonna Road) in San Luis Obispo.

SUMMARY OF STAFF REPORT

DESCRIPTION OF AMENDMENT REQUEST

The submitted amendment (attached as Exhibit 1) proposes to designate a site for a new elementary school to serve the town of Cambria, in the San Luis Obispo County's North Coast Planning Area. The proposed site is referred to as the Rhoades site, and is located on Main Street at its intersection with Highway One, along one of the primary access routes into Cambia's East Village (see Exhibit 2). In order to accommodate a school at this location, the County, at the request of the Coast Unified School District, has proposed to amend the LCP's North Coast Area Plan in the following ways:

- Re-designate 15 acres of land from Agriculture to Public Facilities;
- Extend the Urban Services line across Main Street to encompass the this site;
- Place the school site symbol on the LCP's Combining Designation map for the area; and
- Incorporate new Planning area standards that limit use of the site to schools (pre to secondary); establish setback and design standards; require lighting, landscape, grading, drainage, and erosion control plans; require water efficient plumbing features, water conservation measures and a "dead-end" and, waterline; call for the development of a wetland mitigation plan; and establish standards for drainage basins and swales, construction vehicle activity, traffic and circulation, and air quality.

SUMMARY OF STAFF RECOMMENDATION

A new elementary school to serve the growing population of Cambria is an essential public service need recognized by the LCP. The Coast Unified District has worked diligently to identify the most appropriate site within a highly constrained area. The site selected by the District and proposed by the amendment raises issues regarding the protection of agricultural resources, stable urban/rural

boundaries, wetlands, visual resources, and coastal water quality and supplies. Nevertheless, after an exhaustive review of alternatives, this site has been determined by the school district to be the most feasible alternative available to meet the community's educational needs.

Staff has participated in the local review of the proposed school project, and, among the numerous alternatives identified by the District, encouraged the pursuit of the site known as the Schoolhouse lane site, directly across Main Street from the proposed Rhoades site. This alternative is more protective of coastal resources because it is within the existing urban reserve line, on land designated for residential development and will minimize impacts on views and wetlands. The District has rejected this alternative because it does not provide adequate space for the facilities they desire; will require significant amounts of fill to create level building pads and playing fields; will have adverse impacts on local traffic and circulation; and is in an area where the future expansion of the adjacent middle school could best be accomplished. Thus, the Schoolhouse Lane site is not considered to be a feasible site.

Staff recommends therefore recommends that the Commission **approve** the amendment to allow a new elementary school to be constructed at the proposed site. Staff also recommends that the Commission adopt **modifications** to the standards for school development needed to bring the amendment into conformance with the Coastal Act. Specifically, modifications are needed to:

- protect agricultural production activities on and adjacent to the proposed school site consistent with Coastal Act Sections 30241 and 30242;
- provide a stable urban/rural boundary consistent with Coastal Act Section 30241(a);
- provide design and landscaping standards that will protect the area's scenic rural character consistent with Coastal Act Section 30251;
- avoid impacts to wetlands unless such alternatives are more damaging to coastal resources consistent with Coastal Act Sections 30233(a) and 30007.5;
- effectively mitigate wetland impact that may occur consistent with 30233(c);
- protect coastal water quality consistent with Coastal Act Sections 30230 and 30231; and,
- conserve scarce water resources consistent with Section 30231.

Only with these modifications can the amendment be found consistent with the Chapter 3 policies of the Coastal Act.

ANALYSIS CRITERIA

The relationship between the Coastal Act and a local government's Local Coastal Program (LCP) can be described as a three-tiered hierarchy with the Coastal Act setting generally broad statewide policies. The Land Use Plan (LUP) portion of the LCP incorporates and refines Coastal Act policies for the local jurisdiction, giving local guidance as to the kinds, locations, and intensities of coastal development. The Implementation Plan (IP), or zoning portion of an LCP typically sets forth zone districts and site regulations which are the final refinement specifying how coastal development is to proceed on a particular parcel. The IP must be consistent with, and adequate to carry out, the policies of the LUP. The LUP must be consistent with the Coastal Act.

In this case, the proposed LCP amendment affects only the LUP component of the San Luis Obispo County LCP. Thus, the standard of review for the amendment is consistency with the Chapter 3 policies of the Coastal Act.

ADDITIONAL INFORMATION

For further information about this report or the amendment process, please contact Steve Monowitz, Coastal Planner, at the Central Coast District Office of the Coastal Commission, 725 Front St., Suite 300, Santa Cruz, CA 95060; telephone number (831) 427-4863.

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I. STAFF RECOMMENDATION

MOTIONS AND RESOLUTIONS

The Commission must make the following two motions in order to act on this proposal as recommended by staff:

A. Denial of the Land Use Plan Amendment As Submitted

MOTION 1: *I move that the Commission certify Land Use Plan Amendment Number 2-01 as submitted by San Luis Obispo County.*

STAFF RECOMMENDATION TO DENY:

Staff recommends a **NO** vote. Failure of this motion will result in denial of the amendment as submitted and adoption of the following resolution and findings. The motion passes only by an affirmative vote of a majority of the appointed Commissioners.

RESOLUTION TO DENY:

The Commission hereby denies certification of the Land Use Plan Amendment Number 2-01 as submitted by San Luis Obispo County and adopts the findings set forth below on the grounds that the amendment does not conform with the policies of Chapter 3 of the Coastal Act. Certification of the Land Use Plan amendment would not comply with the California Environmental Quality Act because there are feasible alternatives or mitigation measures that could substantially lessen any significant adverse impact that the Land Use Plan Amendment may have on the environment.

B. Approval of the Land Use Plan Amendment with Suggested Modifications

MOTION 2: *I move that the Commission certify Land Use Plan Amendment Number 2-01 for San Luis Obispo County if it is modified as suggested in this staff report.*

STAFF RECOMMENDATION TO CERTIFY WITH SUGGESTED MODIFICATIONS:

Staff recommends a **YES** vote. Passage of the motion will result in the certification of the land use plan amendment with suggested modifications and adoption of the following resolution and findings. The motion to certify with suggested modifications passes only upon an affirmative vote of the majority of the appointed Commissioners.

RESOLUTION TO CERTIFY WITH SUGGESTED MODIFICATIONS:

The Commission hereby certifies the Land Use Plan Amendment 2-01 for San Luis Obispo County if modified as suggested and adopts the findings set forth below on the grounds that the Land Use Plan amendment with suggested modifications will meet the requirements of and be in conformity with the policies of Chapter 3 of the Coastal Act. Certification of the land use plan amendment if

modified as suggested 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 plan on the environment, or 2) there are no further feasible alternatives or mitigation measures that would substantially lessen any significant adverse impacts which the Land Use Plan Amendment may have on the environment.

II. SUGGESTED MODIFICATIONS

The Commission hereby suggests the following changes to the proposed Local Coastal Program amendment, which are necessary to make the requisite findings. Suggested additions to the amendment submittal are shown with underlines, deletions with ~~strikethroughs~~. If the local government accepts each of the suggested modifications within six months of Commission action, by formal resolution of the Board of Supervisors, the corresponding amendment portion will become effective upon Commission concurrence with the Executive Director finding that this has been properly accomplished.

Modification 1: Revise Standards Regarding Allowable Uses

Modify proposed Standard 1 to allow for continued agricultural use and prohibit the extension of public services beyond the project site as follows:

1. *Limitation of Use. Allowable uses shall be limited to Schools – pre to secondary~~.~~, and agricultural uses. Portions of the site that will not be developed as part of an approved school facility shall be used only for agriculture, open space, or habitat restoration and enhancement. No subdivision other than that necessary to create the maximum 15-acre school site, or adjustment of lot lines that would result in an increase in the size of the Public Facilities parcel, shall be allowed. Prior to the approval of the land division required to establish the school site, allowable uses on the remainder of the parent parcel shall be restricted to the production of agricultural products via permanent deed restriction that expressly prohibits any additional land division of the site.*

   The installation of public sewer and water utilities may be allowed on the Public Facilities site only where necessary to serve school uses that have received all necessary development approvals, provided that all pipelines are the minimum size necessary to serve the approved development and the deed for the property is permanently restricted in a manner that prohibits tie-in to the utility lines. The installation of utilities may not occur until development of approved school facilities has commenced and the deed restriction has been recorded.

Modification 2: Supplement Setback Standards

Modify Standard 2 regarding setbacks to provide protection of wetlands and surrounding agricultural uses as follows:

2. *Setbacks. School facilities shall be set back from all wetland areas on the site in accordance with Section 23.07.172 of the Coastal Zone Land Use Ordinance unless the Review Authority determines that lesser setbacks, or the fill of wetland areas, is less damaging to significant coastal resources. As part of the coastal development permit review required for the creation of the public lot and the development of school facilities, all areas of the site that meet the LCP's definition of a wetland shall be delineated, and adjustments to the parcel and or school design shall be made as necessary to provide setbacks that are the most protective of significant coastal resources.*

   The following agricultural buffer on the site, and a "right-to farm statement", shall be provided with any development or land division:

   a. *School development shall be compatible with the continuance of agricultural uses on surrounding parcels by providing agricultural buffers designed to prevent conflicts between school use and surrounding agricultural operations. Buffers shall be entirely located on the school site, incorporate vegetative or other physical barriers, and be as wide as necessary to prevent land use conflicts. Buffers shall be no less than ~~20 to~~ 50 ~~foot width~~ feet wide along the adjoining property lines except in limited instances where the review authority determines that a lesser setback would effectively prevent conflicts with agriculture ~~of the proposed site parcel~~.*

   ~~b.~~ *No structures used for human habitation shall be constructed within the buffer area. Uses allowed in the buffers shall be limited to student agricultural activities, septic systems, and any habitat improvements as may be specified in a habitat restoration plan. The buffer area shall be permanently protected and restricted by easement or dedication. Buffer plantings or any other required barriers shall be maintained in perpetuity.*

   b. *Right to Farm Statement. Prior to the approval of school development on the site, the applicant shall record a deed restriction certifying that the owner(s) or Leasees of the property acknowledge and agree: (a) that the property described herein is adjacent to land utilized or designated for agricultural purposes; (b) that students, faculty, and all other users of the property may be subject to inconvenience or discomfort or adverse effects arising from adjacent agricultural operations including, but not limited to,*

dust, smoke, noise, odors, fumes, grazing, insects, application of chemical herbicides, insecticides, and fertilizers, and operation of machinery; (c) users of the property accept such inconveniences and/or discomforts from normal, necessary farm operations as an integral part of occupying property adjacent to agricultural uses; (d) to assume the risks of inconveniences and/or discomforts from such agricultural use in connection with this permitted development; and (e) to indemnify and hold harmless the owners, lessees, and agricultural operators of adjacent agricultural lands against any and all liability, claims, demands, damages, costs (including costs and fees incurred in defense of such claims), expenses, and amounts paid in settlement arising from any issues that are related to the agricultural land use and its impact to users of the property.

Modification 3: Supplement Design Standards

Supplement Standard 3 regarding Design as follows:

3. *Design Standards. The following design requirements apply to any new development of school facilities and to the creation of the public facilities parcel ~~or land division~~.*

   a. *The size and configuration of the Public Facilities parcel shall preserve the maximum amount of agricultural land contained on the existing 479 acre agricultural parcel, and shall not exceed 15 acres in size. This shall be achieved by clustering school facilities as much as possible.*

   b. *Where feasible, new structures shall be hidden from Highway 1; otherwise such development shall be screened through planting and permanent upkeep of appropriate tree species, in accordance with the landscaping standards below.*

   ~~a~~c. *The buildings shall be placed on the site with minimal use of cut and fill while meeting state design criteria and disabilities act considerations. The impervious surface coverage shall be limited to the minimum necessary to accommodate a public school of a size documented as needed by the school district to serve existing and projected student populations and to meet State School Sizing Criteria. In no case shall this exceed 6 acres.*

   d. *All structures shall be limited to one story. No structure shall extend above the ridgeline when viewed from public places, and the highest point of any structure shall be at an elevation of 315 feet.*

~~b~~e. *The buildings architecture shall use best design standards to be consistent with the character and the community of Cambria and compatible with the rural agricultural character of the surrounding rolling hill landscape. Compatible design shall be achieved through the use of: utilitarian design features; roofs pitched above horizontal; low-slung buildings separated by open spaces to break up visual massing; large building facades broken up by varied rooflines, offsets, and building projections that provide shadow patterns; and large structures broken down into smaller building elements (rather than long continuous forms. Large box-like designs, large unbroken rooflines, and/or large flat surfaces lacking architectural treatment shall not be allowed. All required fencing shall be rustic split rail fencing of rough-hewn and unpainted wood timbers (e.g., cedar) with the exception that alternative fence designs may be considered where necessary to provide effective agricultural buffers and designed to be compatible with the site's surroundings.*

e~~f~~. *Any ancillary structures on the buildings such as air conditioning and electrical features shall be shielded from view, with screens that are part of the architectural design.*

~~d~~g. *Architectural elevations showing exterior finish materials, colors, and heights above the existing natural ground surface shall be submitted with any application. Colors of the buildings and building materials shall minimize the structure massing of new development by reducing the contrast between the proposed development and the surrounding environment. Colors shall be muted to soften the appearance of the structure and to reduce visibility from scenic Highway 1, and shall be compatible with the natural colors of the surrounding environment, including vegetation, rock outcrops, etc. Darker, non-reflective earth-tome colors shall be selected for walls, chimneys, etc. and darker green, gray, slate blue, or brown colors for the roof structures.*

h. *The design of the school facilities shall include a refuse containment and maintenance component that provides fully enclosed or animal-proof garbage containers; specifically designated eating areas; and provisions built into maintenance contracts requiring that all eating areas anywhere on campus be swept clean on a daily basis.*

i. *All linear utilities (including but not limited to electrical power, telephone and cable television service connections) shall be placed underground. Accessory utilities (e.g., utility meters, electrical panels, and transformers) shall be placed underground as practicable and*

safe.

Modification 4: Revise and Supplement Lighting Standards

Make the following revisions and additions to proposed Standard 4:

4. *Lighting. A lighting plan showing the height, location, and intensity of all exterior lighting shall be submitted with any application for development and shall, at a minimum, comply with the following standards:*

   a. *All light fixtures shall be shielded so that neither the lamp nor the related reflective interior surface is visible. All light poles, fixtures, and hoods shall be dark colored. All exterior light sources shall be low-level and adjusted so that light is directed away from neighboring areas. The height of freestanding outdoor light fixtures shall be limited to the height of the tallest permitted building on the site, and in no case any taller than 20 feet. Any security lighting shall be shielded so as not to create glare when viewed from neighboring areas. Light poles and fixtures shall not be obtrusive to travelers along Highway 1. There shall be no exterior night lighting, other than the minimum lighting necessary for pedestrian and vehicular safety purposes.*

Modification 5: Supplement Landscaping Requirements

Supplement the proposed landscaping standard as follows:

5. *Landscaping. A landscape plan meeting the requirements of Section 23.04.180 et seq. of the Coastal Zone Land Use Ordinance, and prepared by a qualified individual acceptable to the Department of Planning and Building, shall be submitted with any application for development. The landscape plan shall, at a minimum, include the following:*

   a. *Vegetation that will provide 75 percent screening of new development after five years, including ancillary structures such as trash collection areas and maintenance structures when viewed from public view corridors such as: Highway 1, north of Main looking east; Ardath Drive and Green Street intersection looking east; intersection of Main and Highway 1looking east; and Highway 1, south of Main and Highway 1 looking north. This requirement shall be certified by the individual who prepared the plan. The landscape plans shall show clusters of trees and the use of shrubs with trees that vary in height such that the appearance of a stockade ringing the project will be reduced. Landscaping around the playground areas shall transition into the surrounding grazing land.*

Parking areas shall include landscaped berms or other measures to ensure that parked cars are screened as much as possible from view of travelers along Highway One and other public view corridors. The overall landscape design shall evoke the sense of rolling rural area by limiting large trees to those required to screen the development, and by transitioning from the developed area to the surrounding grassland habitat using a mix of native shrubs and grasses.

b. *Landscape screening along Highway 1 to screen views of any development to northbound and southbound travelers, including additional screening (shrubs and ground cover) planted prior to any site disturbance along the frontage of Highway 1 between Highway 1 and Main Street to screen views from the scenic highway. Existing trees planted by the Land Conservancy and additional screening shall be shown on the landscape plan. The trees and screening materials shall blend in with the existing trees along Highway 1, ~~and~~ shall be consistent with community of Cambria tree selections, and shall be compatible with the area's natural surroundings.*

c. *The use of native plant species and non-invasive ornamental species that are drought-tolerant and/or have low irrigation requirements, are fire resistant and are tolerant to the use of recycled water. Development of the landscaping plan shall be coordinated with the Cambria Fire Department to avoid fire hazards.*

d. *A detailed irrigation plan that provides an adequate and permanent and source of water to maintain the landscaping. The irrigation plan shall provide maximum water conservation by using drip irrigation where feasible; designing the system to avoid runoff, overspray, low head drainage, or other similar conditions where water flows onto adjacent property, non-irrigated areas, walks, roadways or structures; and, utilizing collected runoff and reclaimed water in accordance with Standard 5f, below. Subsurface irrigation of any play fields should be investigated as a method to reduce evaporation losses and allow for the use of fields during irrigation.*

~~d~~e. *An aggressive tree planting and landscape plan using species endemic to the area, including coordination with the APCD to specifically address the use of deciduous and evergreen trees, planted so that they shade structures in summer, decrease temperatures, and reduce energy demands for air conditioning and fossil fuel emission.*

ef. *Compliance with the County of San Luis Obispo and the Cambria*

Community Services District requirements concerning the installation and use of reclaimed water systems for the landscape irrigation such as the installation of rain water cisterns to collect and re-use runoff. The cisterns and piping shall be appropriately sized to be used as reservoirs for reclaimed water from the purple pipe system after runoff water has been used. To avoid potential cross connection, the irrigation system must be separate from all potable service and have a separate meter. When a recycled water system is available and prior to use, the plumbing system shall be tested to ensure that there is no cross connections between irrigation and potable piping. Additional precautions include separate potable plumbing to drinking fountains in playing fields

g. A grounds maintenance plan that minimizes the use of pesticides, herbicides, and fertilizers, and protects against adverse impacts associated with them. Pesticides and herbicides shall only be used if there is a documented problem and not on a regular preventative schedule, and shall not be applied if rain is expected. Non-chemical fertilizers are preferred. The least toxic alternatives, and the minimum necessary for the problem, shall be used in any case. The landscaping and grounds maintenance plan shall include nutrient control parameters.

fh. As a condition to approval of any development, a qualified individual shall be retained to monitor the new landscaping for no less than five years, and to maintain the site free of weeds and invasive non-natives (such as acacia, pampas grass, and scotch broom), to ensure that it meets the goal of screening. A status report shall be submitted to the Department of Planning and Building annually. Any necessary remedial measures identified in the status reports shall be completed within 60 days of the completion of the report. All plantings must be maintained in good growing conditions throughout the life of the project, and whenever necessary, shall be replaced with new plant materials to ensure continued compliance with the plans.

Modification 6: Supplement Cultural/Historic Resource Protection Standards

Supplement Standard 6 as follows:

6. *Cultural/Historic Resources. In the event that cultural or historic material is discovered during construction activities, all construction in the affected area shall cease until the find is evaluated by a qualified archaeologist/historian approved by the Department of Planning and Building and the requirements of Section 23.05.140 of the Coastal Zone Land Use Ordinance have been satisfied.*

Modification 7: Supplement Drainage and Erosion Control Standards

Modify Standard 7 to include the following addition coastal water quality protection measures:

7. *Grading, Drainage and Erosion Control Plans. Grading, drainage and erosion control plans meeting the requirements of Section 23.05.020 et. seq. of the Coastal Zone Land Use Ordinance shall be submitted with any application for development. The plans shall, at a minimum, include the following:*

   a. *A drainage and erosion control plan (including submittal of drainage calculations) and storm water pollution prevention plan (SWPPP) for ~~the agencies~~ review and approval by the County Department of Planning and Building in consultation with the Resource Conservation District, the County Public Works Department, and the Regional Water Quality Control Board. Any dewatering system, drainage diversion or other temporary construction measures designed to reduce runoff and sedimentation from leaving the site shall be included in the submittal.*

   b. *Appropriate erosion control measures during construction, including limiting construction activities to dry weather to avoid increased surface water runoff and erosion on-site~~;~~. The plans shall specifically identify all nearby storm drain inlets and natural drainage swales, and shall protect them from construction-related runoff and sediment with sand bag barriers, filter fabric fences, straw bale filters, block and gravel filters, drop-inlet sediment traps, etc. ~~and sedimentation of nearby drainages, installation of a~~ Appropriate erosion control devices (i.e. hay bales, slit fences or equivalent apparatus) shall be installed around the perimeter of each construction zone and all areas experiencing disturbances of the ground surface. All stockpiled materials and disturbed ground surfaces shall be covered on a daily basis. ~~and m~~Monitoring of the erosion control devices shall be done on a daily basis by construction personnel, and periodically by the biological monitor, to ensure proper function.*

   The plans shall make it clear that: (a) dry cleanup methods are preferred whenever possible and that if wet cleanup is necessary, all runoff will be collected to settle out sediments prior to discharge from the site; all de-watering operations must require filtration mechanisms; (b) off-site equipment wash areas that provide containment and filtration of debris and wastewater are preferred whenever possible; if equipment must be washed on-site, the use of soaps, solvents, degreasers, or steam cleaning equipment should not be allowed; in any event, wash water shall not be allowed to enter storm drains or any natural drainage; (c) concrete

rinsates shall be collected and shall not be allowed into storm drains or natural drainage areas; (d) good construction housekeeping shall be required (e.g., clean up all leaks, drips, and other spills immediately; refuel vehicles and heavy equipment off-site and/or in one designated location; keep materials covered and out of the rain (including covering exposed piles of soil and wastes); dispose of all wastes properly, place trash receptacles on site for that purpose, and cover open trash receptacles during wet weather); and (e) all erosion and sediment controls shall be in place prior to the commencement of grading and/or construction as well as at the end of each day;

c. *Minimizing of grading to create cut and fill slopes that are not obtrusive to travel along Highway 1.*

d. *Delineation of the vertical height of all cut and fill slopes, with the border of cut slopes and fills rounded off to a minimum radius of five feet. All cut or fill areas shall vary in height to look natural (undulate) and in no case shall exceed a slope of 2:1.*

e. *Location of soil stockpiles in areas that do not have potential to experience significant runoff during the rainy season.*

f. *Revegetaton of all disturbed and barren areas immediately following completion of construction-related activities with appropriate native vegetation to reduce the risk of erosion from the site. Areas experiencing temporary disturbance should be replanted with native species that are characteristic of habitats of the project area.*

g. *Provisions for a Certified Engineering Geologist to inspect the cut slopes at the completion of rough grading to ensure that no unforeseen conditions are present. If slope instabilites are present that pose a hazard to persons or structures, the project Engineering Geologist shall provide recommendations to eliminate the identified hazards.*

h. *A post-construction drainage plan designed to capture and filter typical site runoff to remove typical pollutants. Runoff from all surfaces subject to vehicular traffic shall be filtered through an engineered filtration system specifically designed to remove vehicular contaminants[1]. Filtered runoff shall be reused for landscape irrigation, or shall be discharged in a manner that maintains pre-construction drainage patterns, supports*

[1] *Vegetative or other media filter devices effective at removing and/or mitigating contaminants such as petroleum hydrocarbons, heavy metals, and other particulate; or, engineered filtration systems specifically designed to remove vehicular contaminants*

wetland restoration purposes, and/or recharges groundwater basins, without causing erosion or sedimentation. All detention and filtration systems shall be designed to filter and/or treat the volume of runoff produced from each and every storm event up to and including the 85th percentile 24-hour runoff event, prior to its discharge to a storm water conveyance system. Post-development peak runoff rates and volumes shall be maintained at levels similar to pre-development conditions. 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. All outside storage areas and loading areas shall be graded and paved and either: (1) surrounded by a low containment berm; or (2) covered. All such areas shall be: (1) equipped with storm drain valves which can be closed in the case of a spill; or (2) equipped with a wash down outlet to the sanitary sewer. All restaurants and/or food service uses shall include a plumbed wash-down area (either inside or out) connected to the sanitary sewer.

(i) Provisions for site maintenance, including a program for sweeping and/or vacuming parking lot areas, driveways, and other vehicular traffic areas at regular intervals and at least once prior to October 15th of each year. Any oily spots shall be cleaned with appropriate absorbent materials. All debris, trash and soiled absorbent materials shall be disposed of in a proper manner. If wet cleanup of any of these areas is absolutely necessary, all debris shall first be removed by sweeping and/or vacuuming, all storm drains inlets shall be sealed, and wash water pumped to a holding tank to be disposed of into the sanitary sewer system.

All drainage facilities shall be permanently operated and maintained. At a minimum:

(1) All traps/separators and/or filters shall be inspected to determine if they need to be cleaned out or repaired at the following minimum frequencies: (1) prior to October 15th each year; (2) prior to April 15th each year; and (3) during each month that it rains between November 1st and April 1st. Clean-out and repairs (if necessary) shall be done as part of these inspections. At a minimum, all traps/separators and/or filters must be cleaned prior to the onset of the storm season, no later than October 15th of each year;

(2) Debris and other water pollutants removed from drainage devices during clean-out shall be contained and disposed of in a proper manner; and

(3) All inspection, maintenance and clean-out activities shall be documented in an annual report submitted to the Planning and Building Department no later than June 30th of each year.

Modification 8: Supplement Standards for Sewer and Water Facilities

Add the following requirements to Standard 8:

8. Sewer/water facilities. Any development shall provide water supply and sewage disposal systems designed as follows:

a. Water efficient plumbing features, including all Cambria Community Services District standards for plumbing fixtures.

b. All water and sewer lines shall be designed and installed in accordance with the requirements of the County of San Luis Obispo and the Cambria Community Services District. The water and sewer lines will be ~~a~~ "dead-end" lines, meaning that they shall be the minimum size necessary to accommodate the permitted use; they shall be designed and built without extra connection points (i.e., stub-outs) not necessary for the permitted use; and, that a permanent restriction against the extension of water and sewer service beyond site shall be recorded on the deed for the property. Fire flows must considered when designing these pipelines, which shall be installed only in conjunction with actual construction of the development that they are to serve. Plans for water and sewer infrastructure shall identify the location and size of all water and wastewater pipelines, as well as calculations indicating the amount of water needed and wastewater generated from the development, and the commensurate sizing of the utility lines.

c. In the event of a stage I or greater water supply condition, Cambria Community Services District-requested standby water conservation programs shall be implemented.

Modification 9: Revise and Supplement Wetland Mitigation standards

Supplement the requirements for a Wetland Mitigation Plan as follows:

9. Wetland Mitigation Plan. Any application for school development that involves impacts to the site's wetland habitats shall be accompanied by a ~~The~~ wetland mitigation plan and monitoring program~~, in the form of a section 404 permit and a resultant wetland mitigation program, shall be approved by Army Corps of Engineers and the California Coastal Commission~~ to compensate for the loss of wetland and other water habitats on the site~~ and shall be submitted~~

~~*with any application for development.*~~ *The plan shall be developed by a qualified wetland biologist and hydrologist and shall be coordinated with the Army Corps of Engineers, California Department of Fish and Game, and the California Coastal Commission* ~~*shall be consulted with to determine acceptable mitigation ratio for wetlands replacement. Mitigation ratios of 2:1 for wetland impacts and 1:1 for other water impacts are typically required.*~~ *The wetland mitigation plan shall, at a minimum:*

a. ~~*Specify the type of mitigation selected (e.g.,*~~ *Provide for the creation of new wetlands, or the enhancement of existing wetlands, of a similar type to that which will be impacted by the project. If feasible, this should occur on site, among other means, by re-routing the drainage channel and/or maximizing the wetland habitat values provided by the project's drainage features.* ~~*, dedication, or land banking of existing wetlands, or paying of in lieu fees)*~~

b. ~~*The method of determining*~~ *Identify the amount of mitigation to be provided, which shall be proportional to the impact and maintain the functional capacity of the wetland. Specifically, the mitigation plan shall demonstrate that the wetland habitat to be enhanced or created will provide an area of equal or greater size and biological productivity as that being impacted, with additional area to account for potential restoration failures and any temporary loss of habitat* ~~*(e.g., fees, amount of replacement dedication).*~~

c. ~~*If wetlands are to be enhanced or replaced, the mitigation plan shall s*~~*Specify the location, condition, methods of improvement, buffers, and maintenance and success cafeteria.*

d. *A monitoring plan shall be approved by the County Department of Planning and Building. The monitoring plan shall include, goals, responsibilities, authorities, and procedures for verifying compliance with environmental mitigation; lines of communication and reporting methods; daily and weekly reporting of compliance; construction crew training regarding environmental sensitivities; authority to stop work; and action to be taken in the event of non-compliance.*

Modification 10: Supplement Standards for Drainage Basin and Swales

Revise and Supplement Standard 10 regarding drainage basins and swales as follows:

10. Drainage basin and drainage swales. Any proposed drainage basins and/or drainage swales that convey runoff shall be designed to act as wetland habitat. Drainage basins shall be designed to have gently sloping sides to

allow establishment of riparian and wetland vegetation along the banks, and the outlet shall be placed at a height that will retain some water in the basin after storm flows pass. Swales shall be revegetated with native wetland species appropriates to the area, such as juncus. Drainage swale and basin design shall take this into account when determining the size of the swales and basins, and by designing access routes for maintenance that will minimize disruption of wetland habitat.

Modification 11: Update Urban Services Line shown by LCP Maps and Allow for Minor Adjustment in Configuration of Public Facilities Land Use Designation

Update the location of the Urban Services Line to encompass the 14.6-acre school site concurrently with the proposed changes to the LCP maps (i.e., change in land use designation and addition of elementary school label).

In addition, add a footnote that applies to the area designated Public Facilities that states:

Minor adjustments in the location and configuration of the Public Facility land use designation may be accommodated as necessary to allow enable school development to occur in a manner that is most protective of significant coastal resources, provided that the adjustment does not adjust in a Public Facility designation larger than 15 acres in size.

III. RECOMMENDED FINDINGS

The San Luis Obispo County certified LCP is composed of seven parts: the Coastal Zone Land Use Ordinance, which is the Implementation Plan (IP) portion of the LCP; the Framework for Planning, the Coastal Plan Policies, and four Area Plans, which make up the Land Use Plan (LUP). The Commission approved the LUP with modifications on October 14, 1982, and the IP was approved as submitted on October 7, 1986. The County assumed permit-issuing authority on March 1, 1988.

A. Amendment Description

The submitted amendment (attached as Exhibit 1) proposes to designate a site for a new elementary school to serve the town of Cambria, in the San Luis Obispo County's North Coast Planning Area. The proposed site is referred to as the Rhoades site, and is located on Main Street at its intersection with Highway One, along one of the primary access routes into Cambia's East Village (see Exhibit 2). In order to accommodate a school at this location, the County, at the request of the Cambria Unified School District, has proposed to amend the LCP's North Coast Area Plan in the following ways:

- Re-designate 15 acres of land from Agriculture to Public Facilities;
- Extend the Urban Services Line across Main Street to encompass the this site;

- Place the school site symbol on the LCP's Combining Designation map for the area; and

- Incorporate new Planning Area Standards that limit use of the site to schools (pre to secondary); establish setback and design standards; require lighting, landscape, grading, drainage, and erosion control plans; require water efficient plumbing features, water conservation measures and a "dead-end" waterline; call for the development of a wetland mitigation plan; and, establish standards for drainage basins and swales, construction vehicle activity, traffic and circulation, and air quality.

B. Amendment Background/Project Alternatives

1. Background:

Throughout coastal California, the ability of local districts to meet the needs of a rapidly growing population is an ongoing challenge. Within many urban areas, growth exceeds essential public service and infrastructure capacities, presenting service providers with the challenge of figuring out ways to address these deficiencies within a highly constrained environment. In some instances, the only available solutions raise conflicts between the range of applicable federal, state and local regulations. This underscores the importance for LCP's and General Plans to limit and pace growth in accordance with known and reliable public service capacities.

The North Coast Area Plan and the LCP's Resource Management System document the need for a new elementary school to serve the growing population of Cambria. The LCP currently designates an elementary school site near the residential community of Lodge Hill, in the undeveloped area known as the East West Ranch that has since been acquired for conservation purposes. This may have been an appropriate site to consider when the potential remained for residential development of the ranch. However, the recent acquisition of this site, the availability of new information regarding its environmental sensitivity, and the communities clear interest in preserving its open space values, eliminate the designated site on the East West Ranch as an acceptable alternative.

2. Alternatives:

Thus, the Cambria Unified School District has been pursuing an alternative site for many years. The School District completed its first analysis of alternative sites in 1997. This was followed by a 1999 update. An additional alternative analysis was conducted as part of an Environmental Impact Report (EIR) for the school project prepared in 2000. Exhibit 3 shows the location of the 24 alternative sites that were considered by the EIR.

As documented by these alternative analyses, the development patterns, topography, hazards, and resource constraints within Cambria have made the identification of a site that meets all state and local criteria alternatives very difficult. Within the urban core, most lots are too small to accommodate a school. Most areas along and outside the developed urban area contain steep slopes, sensitive habitats, flood hazards, scenic resources, and/or productive agricultural uses. After

evaluating all of these factors, the District has concluded that the 14.6-acre portion of the Rhoades site proposed by this amendment is the best alternative available.

Commission staff has participated in the site selection process, and has encouraged full consideration of alternative sites within the existing urban area that would avoid hazards, impacts to environmentally sensitive habitat areas and/or agricultural lands, and would prevent the inducement of growth within rural areas. Of the 24 sites evaluated by the EIR, the sites that best met these criteria include the existing elementary school site; a mobile home park site near the existing elementary school; the existing High School site; and, a site adjacent to the existing middle school, known as the Schoolhouse lane site.

a. Alternatives in Cambria's West Village

The existing elementary school site was rejected due to its limited size (3.3 acres) and its close proximity to Santa Rosa creek. The District currently plans to use this facility for administrative offices. The nearby mobile home park was rejected due to the same constraints, and the added problem of soil contamination.

b. High School Campus

The District has rejected the alternative of constructing the elementary school on the existing High School campus because the elementary school would occupy areas used for High School athletic and community education programs. In addition, the District is concerned that locating elementary students in close proximity of the High School could interfere with education. Flood hazards and riparian resources on the High School campus are additional limiting factors that resulted in the rejection of this alternative.

c. Schoolhouse Lane

The Schoolhouse Lane site is approximately 10 acres in size, consisting of two 5-acre parcels, and is across Main Street from the proposed site, partly within the Urban Services Line and completely within the Urban Reserve Line. It is located adjacent to an existing middle school, and is surrounded to the west and south by residential development. To the east is a narrow strip of land within the agricultural land use designation that contains Fitzhugh Creek. This agricultural parcel is connected, via cattle crossing, to larger agricultural holdings located to the east and south of Main Street. The site slopes steeply to the east, and is currently used for cattle and horse grazing.

Of all the alternative sites considered, the Schoolhouse Lane site appears to be the most protective of coastal resources based on its designation for residential use, its location within the Urban Reserve Line, its distance from the Highway One viewshed, and the ability to minimize impacts. However, the District and the state Department of Education have rejected this alternative by for the following reasons:

Size and Topography. The two five-acre parcels that comprise the Schoolhouse Lane site are steeply sloped, and would require a significant amount of landform alteration to accommodate

essential school facilities. As stated in a letter from the staff of the State's School Facilities Planning Division (attached as Exhibit 4):

> *I am not convinced that the steep slopes on the property can effectively be terraced to provide building pads and playfields for an elementary school. Major earthmoving and engineering retaining walls would no doubt be required to provide stable building foundations and playfields of adequate width. If this is possible, it will be expensive. In addition, the campus would have to be accessible for all, which would require several mechanical lifts for students and teachers unable to walk.*

The school district evaluated two preliminary plans for this site, and determined that even with significant grading and retaining wall construction, only 7 acres of the site would be usable, in comparison to the 9.2 acres of the Rhodes site that will be usable and the 11.4 acres called for by state standards. This would require the elimination of playfields from the project design.

While significant grading will also be required on the Rhoades site, it is not as extensive; 4.7 acres or 40% of the Schoolhouse lane site would need to be graded, while 3.7 acres, or 25% of the Rhoades site requires grading. The Rhoades site has an average slope of 15% and has a total elevation rise of 80 feet, while the average slope at the Schoolhouse Lane site is 19% and the elevation rise is 120 feet. The District estimates 390,000 cubic yards of fill would be required at the Schoolhouse lane site, necessitating 39,000 truck trips. In comparison, there is a 88,000 cubic yard cut and fill balance estimated for grading at the Rhoades site.

School Facilities Master Planning. Expansion of the existing Santa Lucia Middle school adjacent to the Schoolhouse Lane site is anticipated to be necessary to bring the school into conformance with state education facility standards and to meet the demands of the growing population. The present middle school site is 5.5 acres, which is over 1.2 acres short of state standards calling for 6.7 to 9.1 acres of usable area for the current population of over 200 students. Thus, the School Facilities Planning Division has recommended that the Schoolhouse Lane site be acquired by the District to accommodate the needs of the Middle School, which would involve less intensive improvement of the site than the construction of an elementary school.

Traffic Hazards. The primary access road to the Schoolhouse lane site is a narrow undivided two-lane road without shoulders that is often congested by residential and middle school traffic. The addition of 1100 average daily trips associated with the construction of an elementary school on the Schoolhouse Lane site would require widening of the road and intersection modifications. Even with these modifications, traffic and circulation impacts could remain significant.

The only other means of gaining access to the Schoolhouse Lane site would be to construct a new access road from Main Street. This would require a bridge or culvert to cross Fitzhugh Creek, a tributary to Santa Rosa Creek. This would add significant expense to school construction, and would pose adverse impacts on riparian and wetland habitats. It would also interfere with adjacent grazing

operations (see letter from the Fitzhugh Ranch attached as Exhibit 5).

Other Resource Issues. While the Schoolhouse Lane site may minimize impacts on visual and biological resources in comparison to the Rhoades site, these impacts would not be totally eliminated. Other than the riparian habitat associated with Fitzhugh Creek, the Schoolhouse Lane site contains an estimated 0.03 acres of potential wetlands that would require further evaluation. Like the Rhodes site, the Schoolhouse Lane site provides raptor foraging habitat. The Schoolhouse Lane site may also contain rare plants such as the Cambria morning glory and the compact cobwebby thistle.

In terms of visual resources, the Schoolhouse Lane site is not as visible from Highway One, but will still be visible to northbound travelers, albeit within more of an urban context. The Schoolhouse Lane site is also highly visible from Main Street, a primary access route between Highway One and Cambria's East Village.

In conclusion, the District and the state School Facilities Planning Division have determined that the Schoolhouse Lane site will not effectively meet the educational needs of the community. Thus, although preferable from coastal resource standpoint, the Schoolhouse Lane site is not considered to be a feasible alternative.

C. Coastal Act Consistency

1. Protection of Coastal Agriculture

a. Coastal Act Agriculture Policies

Coastal Act Section 30241 states:

> *The maximum amount of prime agricultural land shall be maintained in agricultural production to assure the protection of the areas agricultural economy, and conflicts shall be minimized between agricultural and urban land uses through all of the following:*
>
> > *(a) By establishing stable boundaries separating urban and rural areas, including, where necessary, clearly defined buffer areas to minimize conflicts between agricultural and urban land uses.*
> >
> > *(b) By limiting conversions of agricultural lands around the periphery of urban areas to the lands where the viability of existing agricultural use is already severely limited by conflicts with urban uses or where the conversion of the lands would complete a logical and viable neighborhood and contribute to the establishment of a stable limit to urban development.*

> *(c) By permitting the conversion of agricultural land surrounded by urban uses where the conversion of the land would be consistent with Section 30250.*[2]
>
> *(d) By developing available lands not suited for agriculture prior to the conversion of agricultural lands.*
>
> *(e) By assuring that public service and facility expansions and nonagricultural development do not impair agricultural viability, either through increased assessment costs or degraded air and water quality.*
>
> *(f) By assuring that all divisions of prime agricultural lands, except those conversions approved pursuant to subdivision (b), and all development adjacent to prime agricultural lands shall not diminish the productivity of such prime agricultural lands.*

Section 30242 of the Coastal Act provides:

> *All other lands suitable for agricultural use shall not be converted to nonagricultural uses unless (l) continued or renewed agricultural use is not feasible, or (2) such conversion would preserve prime agricultural land or concentrate development consistent with Section 30250*[3]*. Any such permitted conversion shall be compatible with continued agricultural use on surrounding lands.*

b. Agriculture Analysis

Coastal Act Section 30241 protects agriculture by avoiding conflicts between agricultural and urban land uses (30241(d)). This is to be achieved in various ways. One of the primary ways is by

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[2] Section 30241(c) applies to areas surrounded by urban uses, which is not the case with the Rhoades site. Therefore, neither this section or section 30241.5 is applicable to the amendment.

[3] Coastal Act Section 30250 states:

> *(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. In addition, land divisions, other than leases for agricultural uses, outside existing developed areas shall be permitted only where 50 percent of the usable parcels in the area have been developed and the created parcels would be no smaller than the average size of surrounding parcels.*
>
> *(b) Where feasible, new hazardous industrial development shall be located away from existing developed areas.*
>
> *(c) Visitor-serving facilities that cannot feasibly be located in existing developed areas shall be located in existing isolated developments or at selected points of attraction for visitors.*

prioritizing the development of lands not suited for agriculture. The amendment complies with this requirement because, as detailed above, the school district has thoroughly reviewed the available alternatives and determined that the alternative sites which would avoid agricultural land are not adequate to met the community's educational needs.

Another important way in which the Coastal Act prevents conflicts with agriculture is by requiring stable urban rural boundaries (30241(a)). The LCP implements this requirement by limiting the area eligible to receive urban services, known as the Urban Service Lines (USL), and by identifying areas where urban expansion may occur if resource and service constraints allow (areas within the Urban Reserve Line or URL). The proposed school site is not within the USL or URL, but is immediately adjacent to the URL that runs along Main Street and is separated from the USL by Highway One (see Exhibit 6).[4] Main Street and Highway One thereby currently provide the physical boundary that separates urban and agricultural land uses.

For properties along the periphery of urban areas such as the Rhoades site, Section 30241(b) limits the conversion of agricultural lands to situations where the viability of existing agricultural use is already severely limited, or where the conversion would "complete a logical and viable neighborhood and contribute to the establishment of a stable limit to urban development." In this case, the farmland proposed for conversion is not limited by conflicts with urban uses. It supports a viable cattle grazing operation, as do adjacent lands. Rather, the amendment has been proposed on the basis that the site is an essential component of the school facilities necessary to complete a viable neighborhood. Similarly, as required by Section 30242, the amendment has been proposed as a means to concentrate development consistent with Coastal Act Section 30250.

In most instances, conversions that serve to complete a viable neighborhood and concentrate development are limited to situations where the area is directly adjacent to existing urban uses, without separation by distinct natural or man made features. In this case, the proposed school site and adjacent agricultural lands are clearly separated from exiting urban development by Main Street and Highway One. Nevertheless, adequate education facilities, as essential public services, are necessary components of a viable neighborhood, and the proposed site is the most centrally located to the various residential neighborhoods that comprise the Cambria Urban Area.

In order to establish a stable urban rural boundary consistent with the requirements of Section 30241(b), and to protect the viability and productivity of adjacent agricultural uses as required by Sections 30241(e) and (f), the amendment proposes to re-affix the urban service boundaries around the perimeter of the site, restrict uses to public facilities, provide agricultural buffers, protect water resources, and prohibit the extension of the public services beyond the property. The proposed standards, however, lack the specificity required to ensure a stable boundary, protect agricultural productivity, and avoid land use conflicts, for the reasons discussed below.

[4] In this case, the USL includes the areas west of Highway One. On the eastside of Highway One, the USL is to the north of the proposed school site, across Main Street. Main Street thereby effectively provides the southern boundary of the Cambria Urban Area east of Highway One.

First, the proposed buffers, which can range from a distance of 20 to 50 feet, may not provide an adequate distance between school uses and agricultural operations to prevent additional losses in productive grazing land. As described in the project EIR, typical agricultural buffers range from 100 to 300 feet. To address this issue, the amendment has been modified to require that buffer distances be refined during the coastal development permit review, and in no case be less than 50 feet (see suggested modification 2). Modification 2 also requires that use of fencing or vegetation to maximize buffer effectiveness. Modification 1 limits uses outside of the school facilities footprint to activities that are compatible with agriculture, as a means to support and supplement the function of the buffer.

Irrespective of the size of the buffer required, the potential remains for conflict. To minimize such conflict and carry out Coastal Act priorities for the maintenance of agricultural production, Modification 2 also requires the landowner to recognize and accept that agricultural uses may have adverse impacts on the intended use of the site. This is to be accomplished through the recordation of a "Right-to-Farm Statement".

The proposed amendment also has the potential to reduce the productivity of adjacent prime farmland, inconsistent with the requirements of Coastal Act Section 30242, by converting an excessive amount of agricultural land. Thus, Modification 3 requires that the final size and configuration of the Public Facilities parcel preserve the maximum amount of agricultural land contained on the existing 479 acre agricultural parcel, and not exceed the 15 acres currently proposed. This must be achieved, among other means, by clustering school facilities as much as possible.

Threats to agricultural productivity and a stable limit to urban development are also posed by the potential for the amendment to induce urban development in agricultural areas west of Main Street, which currently provides a distinct physical boundary between urban and agricultural land uses. Although the conversion is limited to purpose of providing essential education facilities, the amendment has the potential to be an incremental step towards the southern expansion of the Cambria Urban Area. Therefore, Suggested Modification 1 requires that a deed restriction be recorded on the parent agricultural parcel, prior to the approval of the subdivision required to form the school site, that restricts use to the production of agricultural products and prohibits subdivisions other than that required to create the school site. In addition to preserving agricultural production activities, this modification ensures that the Rhoades site will remain consistent with the LCP's minimum parcel size of 320 acres. It is also consistent with the general LCP requirement to assure that the agricultural productivity of subdivided parcels is not diminished (see, for example, LCP Agriculture Policy 2).

As another means to avoid the inducement on non-agricultural development, the amendment contains language that requires the water line to serve the project be a "dead-end" line. Although the intent of this standard is clear, the language is not clear enough to ensure that the intent will be achieved. Therefore, Modifications 1 and 8 specify that both water and sewer lines must be the minimum size necessary to accommodate the permitted use; be designed and built without extra

connection points (i.e., stub-outs); and, restricted against future extensions.

Finally, as an additional tool to maintain the productivity of agricultural land, the amendment has been modified to allow agricultural uses to continue on the site. This will enable grazing activities to continue on the site while the District completes its design and permitting requirements for the school. It will also enable the District to consider allowing grazing operations to continue on portions of the Public Facilities parcel where they would not cause conflicts with educational programs and activities.

c. Agriculture Conclusion

The proposed conversion of agricultural land is allowed by the Coastal Act because it accommodates an essential public service that is a necessary component of a viable community, and because the site has been selected to protect prime soils and concentrate the school as close as possible to urban uses. The amendment does not, however, contain sufficient development standards to carry out Coastal Act policies requiring the protection of agricultural productivity and the creation of a stable limit to urban development. Therefore the amendment cannot be approved as submitted. Modifications that will achieve consistency with these Coastal Act requirements have been suggested, and include requirements for the provision of adequate buffers, the recordation of a right-to-farm statement, prohibitions on the extension of utilities, and the allowance of continued agricultural use on the site. Only with these modifications will the amendment be consistent with the agricultural resource protection policies contained in Chapter 3 of the Coastal Act.

2. Wetlands

a. Coastal Act Wetlands Policies

Coastal Act Section 30233 states, in relevant part:

> *(a) The diking, filling, or dredging of open coastal waters, wetlands, estuaries, and lakes shall be permitted in accordance with other applicable provisions of this division, where there is no feasible less environmentally damaging alternative, and where feasible mitigation measures have been provided to minimize adverse environmental effects, and shall be limited to the following:*
>
> > *(l) New or expanded port, energy, and coastal-dependent industrial facilities, including commercial fishing facilities.*
> >
> > *(2) Maintaining existing, or restoring previously dredged, depths in existing navigational channels, turning basins, vessel berthing and mooring areas, and boat launching ramps.*
> >
> > *(3) In wetland areas only, entrance channels for new or expanded*

boating facilities; and in a degraded wetland, identified by the Department of Fish and Game pursuant to subdivision (b) of Section 30411, for boating facilities if, in conjunction with such boating facilities, a substantial portion of the degraded wetland is restored and maintained as a biologically productive wetland. The size of the wetland area used for boating facilities, including berthing space, turning basins, necessary navigation channels, and any necessary support service facilities, shall not exceed 25 percent of the degraded wetland.

(4) In open coastal waters, other than wetlands, including streams, estuaries, and lakes, new or expanded boating facilities and the placement of structural pilings for public recreational piers that provide public access and recreational opportunities.

(5) Incidental public service purposes, including but not limited to, burying cables and pipes or inspection of piers and maintenance of existing intake and outfall lines.

(6) Mineral extraction, including sand for restoring beaches, except in environmentally sensitive areas.

(7) Restoration purposes.

(8) Nature study, aquaculture, or similar resource dependent activities.

...

(c) In addition to the other provisions of this section, diking, filling, or dredging in existing estuaries and wetlands shall maintain or enhance the functional capacity of the wetland or estuary. Any alteration of coastal wetlands identified by the Department of Fish and Game, including, but not limited to, the 19 coastal wetlands identified in its report entitled, "Acquisition Priorities for the Coastal Wetlands of California", shall be limited to very minor incidental public facilities, restorative measures, nature study, commercial fishing facilities in Bodega Bay, and development in already developed parts of south San Diego Bay, if otherwise in accordance with this division.

....

b. Wetlands Analysis

The proposed school site contains at least 0.23 acres of seasonal wetland habitat adjacent and within an eroded drainage course that extends through the middle of the site (Exhibit 7). This wetland is described on page V-24 of the Draft EIR as follows:

> *Seasonal wetland communities typically occur in nutrient-rich mineral soils that are saturated throughout much of the year. These communities are found in locations containing slow-moving or stagnant shallow water, and a high water table (Holland, 1986). Such sites commonly occur around springs, seeps, drainage channels, and depressional areas that accumulate runoff from surrounding areas. Standing water does not have to be present throughot the entire year, since the water table is so close to the soil surface that it can be tapped in the dry season by hydrophytic (water loving) plants.*
>
> *As indicated in the Wetland Delineation Report contained in Appendix G, the seasonal wetland areas on the site contain a predominance of hydrophytic plant species, and intergrade with the grassland communities also present in the area. The wetland areas contain a mixture of annual and perennial plants, including a number of listed wetland indicator species. ...*
>
> *The wetland areas present within the school site contain low-quality habitat values and perform limited functions as a result of long-term agricultural disturbance. The areas are located adjacent to several major roadways, including Main Street and Highway 1. Due to the seasonal nature of the drainage, grazing pressure, and the small watershed above, most of the channel consists of bare eroded soil or annual grassland vegetation. ...*
>
> ...
>
> *The wetland areas identified on the site do not contain significant special habitat values for wildlife species due to their degraded nature and limited diversity. These areas may experience sporadic or opportunistic use by various animals and birds during seasonally wet conditions, but the area does not provide suitable cover or nesting habitat for aquatic wildlife species.*

The currently proposed school design proposes to fill this wetland area by installing a culvert and building the facilities on top (see Exhibit 8). The culvert would drain to a detention basin at the base of the site, adjacent to Main Street. The District has proposed to mitigate the loss of wetlands by incorporating wetland features in the design of the detention basin, and, if necessary, restoring and enhancing off-site wetland habitats, such as those adjacent to Santa Rosa creek on the existing High School parcel. This approach is sanctioned by the proposed amendment.

Notwithstanding the limited resource value provided by the wetland area described by the EIR, the

fill of this area for the purpose of constructing a school is inconsistent with Section 30233 of the Coastal Act. Thus, it is essential to consider whether there are alternative site designs and configurations that would avoid impacts to wetland resources.

Upon the Commission staff's request, the District has evaluated alternative designs for the school site that would avoid wetland habitats (Exhibit 9), as well as an alternative campus configuration that moves the campus north to avoid the drainage (Exhibit 10). As described by the District's analysis:

> *In Alternative #2, the drainage cuts the property in half and does not allow for adequate playground space around the classrooms. Crossing the drainage is believed by the District and the State Board of Education to pose a significant safety hazard for students. Designing the site to avoid the drainage area by moving the campus north in Alternative 3 required excessive export of soil, allows for only a single access point, and moves the campus higher on the hillside (see Exhibit W-5, W-6, and W-7 for comparisons of the alternative sites with the application).*

The exhibits referenced above are attached to this report as Exhibits 11 - 13. In sum, the District's analysis concludes that in addition to the safety concerns and increased impact to natural landforms mentioned above, both these alternatives will restrict usable acres, school facilities, and agricultural buffer areas; will cause greater parking and circulation problems, and are beyond the District's budget.

From a coastal resource perspective, it is noted that the impacts associated with these alternatives raise issues regarding the protection of scenic coastal areas and the minimization of natural land form alteration (Section 30251) due to the need for additional grading, as well as with the need for new development to minimize risks to life Section 30253. As detailed in the following Visual Resources findings, the scenic quality of the area is one of the most significant resource issues raised by the amendment. Requiring the avoidance of wetland habitats will push school facilities onto steeper areas of the site and thereby require additional grading, which may increase the project's impacts on scenic views available from Highway One and Main Street. With respect to safety, the state's School Facilities Planning Division has expressed concern that alternative project design that preserves the wetlands and drainage channel will pose safety hazards for students To address these concerns, the District would be required to install extensive fencing, that may run counter to the intent of protecting and enhancing the limited wetlands habitat supported in this area.

Given that the Rhodes site is the only feasible alternative for a necessary school facility, the Commission recognizes that the limits to wetland fill established by Section 30233 may conflict with the visual resource protection requirements of Section 30251 and the safety requirements of Section 30253. Coastal Act Section 30007.5 calls for such conflicts to be resolved in a manner that is, on balance, the most protective of significant coastal resources. At this point in time, it is not clear that these conflicts cannot be avoided, or that the proposal to fill the wetlands is the alternative that is most protective of coastal resources. These questions must be analyzed as part of the County's

coastal development permit review.

Thus, Modification 2 requires school facilities to be set back from all wetland areas on the site in accordance with the wetland setback requirements established by Section 23.07.172 of the Coastal Zone Land Use Ordinance unless the Review Authority determines that lesser setbacks, or the fill of wetland areas, is less damaging to significant coastal resources. To address the fact that the wetland delineation performed to date was based on Corps standards, and not the more broad Coastal Act and LCP definition of a wetland, Modification 2 also revises the amendment to require that supplemental wetland delineation as part of the coastal development permit review(s) required for the creation of the parcel and the development of the school facility.

Notwithstanding the potential that the Review Authority may determine that allowing the fill of the wetlands will best protect the significant coastal resources of the area, the development must still carry out the wetland protection provisions of the Coastal Act to the extent that compliance with these requirements will not conflict with the more significant coastal resource protection needs. In particular, the amendment must conform to the Section 30233(c) requirement that, where permitted, the filling of wetlands must maintain or enhance the functional capacity of the wetland.

To address this policy, the amendment includes development standards that require drainage swales and detention basins to be designed and vegetated in a manner that supports wetland habitats, and that the project include a wetland mitigation program developed in coordination with the US Army Corps of Engineers and the Coastal Commission. However, these standards are not specific or adequate enough to ensure that the alteration of the drainage corridor will protect the functional capacity of the impacted wetlands.

To address these deficiencies, and ensure maximum consistency with Coastal Act Sections 30233(c), the amendment must be modified in a manner that ensures the required mitigation will protect the functional capacity of the wetland resource. Since one of the primary functions of the wetland is water conveyance, the suggested modifications supplement the requirements for drainage and erosion control plans to ensure that natural drainage patterns will be preserved. Modifications to drainage swale and detentions basin standards clarify that the maintenance needs of these facilities be fully considered before they are relied upon as wetland mitigation. As discussed further in the water quality findings, these modifications are also need to protect water quality and agricultural productivity consistent with Chapter 3 policies.

Additionally, the suggested modifications protect the functional capacity of the wetland by providing more specific standards for mitigation. The modified standards specify that the mitigation plan shall be provided in the form of actual wetland enhancement or creation (the option of using land banks or in lieu fees as a method of mitigation has been eliminated) and that the plan must demonstrate that the wetland habitat to be enhanced or created will provide an area of equal or greater size and biological productivity as that being impacted, with additional area to account for potential restoration failures and any temporary loss of habitat. Other aspects of the modifications that are necessary to bring wetland mitigation standards into compliance with Coastal Act policies includes

requirements to coordinate with the Department of Fish and Game.

c. Wetlands Conclusion

The amendment is inconsistent with Coastal Act limitations on the fill of wetlands and therefore cannot be approved as submitted. However, it is recognized that alternative site designs that avoid wetland habitats pose adverse impacts to coastal views and public safety. Since it may not be possible to effectively protect the limited wetland habitat values contained on the site without causing adverse impacts to more significant coastal resources, the amendment has been modified in a manner that enables the coastal development permit Review Authority to resolve this potential conflict in a manner that is, on balance, the most protective of significant coastal resources. The modifications also provide additional standards to ensure that any wetland impacts associated with the project are mitigated consistent with the requirements of Coastal Act Section 30233(c). Only with these modifications does the amendment carry out the wetland protection and resource balancing provisions of the Coastal Act.

3. Visual Resources

a. Coastal Act Visual Resources Policies

Section 30251 of the Coastal Act states:

> *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. New development in highly scenic areas such as those designated in the California Coastline Preservation and Recreation Plan prepared by the Department of Parks and Recreation and by local government shall be subordinate to the character of its setting.*

b. Visual Resources Analysis

As previously noted, the proposed Public Facilities site is located in a highly traveled scenic coastal area. To southbound travelers exiting the Cambria area along Highway One, the site provides the first open view of the scenic open spaces between Cambria and Cayucos. To northbound travelers on Highway One, as well as to travelers entering the town of Cambria via Main Street, the site is part of the gateway to the Cambria Urban Area, and thereby plays an important role in introducing the public to the unique character of Cambria that makes it a popular destination for coastal recreation. Among these unique characteristics is the open space scenic quality of the rural lands surrounding the community. The proposed Public Facilities site, like the other farmland that is adjacent to Cambria's southern boundary, provide scenic views of grasslands and the coastal mountains, and is

indicative of the agricultural activities that are an important component to Cambria's character.

The location, orientation, and topography of the selected school site will undoubtedly result in the school being visible from Highway One and Main Street. The standard established by Coastal Act Section 30251 is that the project's intrusion into the coastal viewshed must protect the scenic quality of the area, minimize the alteration of natural land forms, and be visually compatible with the character of surrounding areas.

As submitted, the amendment seeks to address these requirements by establishing standards for the design, lighting, and landscaping of school facilities. These are not sufficient to carry out Coastal Act standards because they do not: minimize project encroachment into the public viewed; regulate the height of buildings or their extension above ridgelines; provide adequate guidance to ensure the structures will be compatible with the rural agricultural character of the area; require that utilities be placed underground; or adequately control against the adverse visual impacts that can occur from project lighting.

To address these issues, and ensure a school design that is consistent with the rural agricultural character of the area, the suggested modifications:

- Limit structures must to one story
- Prohibit structures that extend above the ridgeline when viewed from public places, or exceed an elevation of 315 feet.
- Require building designs to be compatible with the rural agricultural character of the surrounding rolling hill landscape, among other means, through the use of: utilitarian design features; roofs pitched above horizontal; low-slung buildings separated by open spaces to break up visual massing; large building facades broken up by varied rooflines, offsets, and building projections that provide shadow patterns; and large structures broken down into smaller building elements (rather than long continuous forms). Large box-like designs, large unbroken rooflines, and/or large flat surfaces lacking architectural treatment are prohibited.
- Call for rustic split rail fencing of rough-hewn and unpainted wood timbers (e.g., cedar) with the exception that alternative fence designs may be considered where necessary to provide effective agricultural buffers and designed to be compatible with the site's surroundings.
- Require all utility lines (including but not limited to electrical power, telephone and cable television service connections) to be placed underground. Accessory utilities (e.g., utility meters, electrical panels, and transformers) must be placed underground as practicable and safe.
- Limit the height of freestanding outdoor light fixtures to the height of the tallest permitted building on the site, and in no case any taller than 20 feet, and limit exterior night lighting to the minimum necessary for pedestrian and vehicular safety purposes.

It is recognized that it will be highly unlikely to feasibly hide school development from Highway One views at this location. As a result, the use of landscaping as a screening tool, and the used of design standards to encourage visually compatible development, are the most important aspects of the amendment's visual resource protection provisions.

With respect to landscaping, the introduction of large numbers of trees and ornamental plants will reduce the natural scenic quality of the grassland habitats and have the potential to create fire hazards. To address this concern, the suggested modifications:

- Require an overall landscape design that evokes the sense of rolling rural area by limiting large trees to those required to screen the development, and by transitioning from the developed area to the surrounding grassland habitat using a mix of native shrubs and grasses.
- Prohibit the use of non-native invasive plant species.
- Supplement landscape monitoring, maintenance, and irrigation requirements.
- Require that the landscape plan be coordinated with the fire department to avoid the creation of fire hazards.

c. Visual Resources Conclusion

As submitted, the amendment is inconsistent with Coastal Act Section 30251 because it does not contain standards to ensure that the new public facility development accommodated by the amendment will protect scenic coastal resources. Thus, the amendment cannot be approved as submitted. Only if modified as suggested will the amendment conform to Coastal Act visual resource protection requirements.

4. Water Quality

a. Coastal Act Water Quality Policies

Coastal Act Section 30230 states:

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

Section 30231 of the Coastal Act provides

> *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.

b. Water Quality Analysis

The proposed site and the associated drainage basin are within a small drainage area that is connected to the Santa Rosa Creek watershed via Fitzhugh Creek. Santa Rosa Creek supports important coastal resources, such as the listed Steelhead trout, and provides the primary source of drinking water for the Cambria community. The stretch of the drainage basin between the site and Santa Rosa Creek is mostly comprised of farmland. Thus, any change in water quality or flow regimes resulting from school development has the potential to impact agricultural operations as well as Fitzhugh and Santa Rosa Creeks.

The designated site will require a significant amount of grading to accommodate the school (88,000 cubic yards of cut and fill balance), and necessitates that the drainage course on the site be filled and culverted. Construction activities have a high potential to cause erosion and sedimentation of the site and surrounding area. Post-construction, school facilities such as parking lots will contain pollutants that have the potential to be contained in site runoff and degrade coastal water quality. Finally, the culverting of the drainage course on site has the potential to alter natural drainage properties and cause the erosion of adjacent lands, adversely impacting water quality and agricultural production.

Thus, to carry out the requirements of Coastal Act Sections 30231 and 30232, it is necessary that the amendment include standards for development of the site that will effectively address these issues and protect water quality. As submitted, the proposed development standards lack the following essential components, which have been incorporated into the amendment by the suggested modifications:

- Limitations on impervious surfacing[5];
- Requirements for refuse containment and cleaning of eating and food preparation areas;
- Provisions for grounds maintenance that minimizes the use of pesticides, herbicides, and fertilizers, and protects against adverse impacts associated with them;
- Call for the project's erosion control and drainage plan to be coordinated with the Resource Conservation District;

[5] The maximum of 6 acres has been established based on the preliminary plans for the site developed by the District and attached as Exhibit 8.

- Supplement the water quality protection requirements for construction activities;
- Require a post-construction drainage plan designed to capture and filter site runoff to remove typical pollutants;
- Require detention and filtration systems to be sized and designed with adequate capacity to effectively remove pollutants and prevent erosion of downstream properties;
- Require the development of a site maintenance program to reduce the sources of pollutants and ensure the effective functioning of the drainage infrastructure.

c. Water Quality Conclusion

As submitted, the amendment is inconsistent with Coastal Act water quality protection requirements because it allows for development that poses adverse impacts, and does not include adequate standards to address these impacts. Thus, the amendment must be denied as submitted, and can only be approved with the suggested modifications that resolve the water quality deficiencies.

5. Water Supply

a. Coastal Act Water Supply Policies

Please refer to the Coastal Act policies cited in the Water Quality findings on above.

In addition, Section 30250 states, in relevant 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. In addition, land divisions, other than leases for agricultural uses, outside existing developed areas shall be permitted only where 50 percent of the usable parcels in the area have been developed and the created parcels would be no smaller than the average size of surrounding parcels.*

b. Water Supply Analysis

As documented by the Commission's Periodic Review of the San Luis Obispo County Local Coastal Program (adopted July 12, 2001), there are significant outstanding concerns regarding the adequacy and sustainability of Cambria water supplies, and the impacts that water withdrawals are having on sensitive aquatic resources and habitats. The amendment has the potential to exacerbate these issues

by increasing demands on the area's extremely limited water supplies. The critical status of the water situation is reflected by the Cambria Community Service District's (CCSD's) recent declaration of an emergency water shortage, which has effectively established a moratorium over the issuance of new will-serve letters by the CCSD.

Much of the water required to serve the new elementary school will be transferred from the existing water use at the currently overcrowded grammar school. However, the project EIR estimates that the expected future occupancy of the new school and the water required for the landscaping will result in a net increase in water use of 13.23 acre feet per year (Final EIR, p. V-17).

Upon further analysis of water supply issues since the release of the EIR, the District has identified that the re-use of the existing Grammar School can achieve water savings beyond what was considered in the EIR by converting turf areas to parking and transferring existing water use at the current administrative offices to the reuse of the grammar school. The District has also identified that the estimates of water use contained in the EIR were based on a full calendar year, as opposed to the 190 days of instruction in a school year, including summer school. Additionally, the District's analysis has identified the ability to conserve water through more efficient landscaping irrigation and the installation of a reclaimed water system for such irrigation. In total, the District has concluded that the project, including the re-use of the existing Grammar school site, will result in an additional water demand of 9.92 acre feet per year.

In terms of the affect of the declared Water Emergency on the project, the CCSD has specifically exempted new school facilities from the resulting moratorium. In a letter dated January 31, 2002 (attached as Exhibit 14), the CCSD staff states that the analysis of the water supply used to prepare the emergency declaration took into account the demands of the new school. The CCSD has affirmed its commitment to provide water service to the school, and to work with the school district in developing a water re-use program for irrigation of landscaping and playfields. The CCSD has therefore concluded that the demands placed on the water system by the new school will not be of sufficient volume to impact the delivery of water to other current users.

In accordance with the above analyses, the provision of an adequate and reliable water supply to the new school that avoids impacts to aquatic habitats is dependent upon the implementation of significant water conservation measures. Therefore, to comply with Coastal Act Sections 30230, 30231, and 30250 it is essential that the development standards provided by the amendment will ensure the implementation of these conservation measures. Towards this end, the suggested modification supplement the proposed requirements for water conservation by requiring a detailed irrigation plan that provides maximum water conservation by using drip irrigation where feasible; designing the system to avoid runoff, overspray, low head drainage, or other similar conditions where water flows onto adjacent property, non-irrigated areas, walks, roadways or structures; and, utilizing collected runoff and reclaimed water for irrigation purposes.

c. Water Supply Conclusion

In spite of Cambria's critical water shortage, and the associated impacts posed to aquatic coastal resources, the CCSD has determined that it has adequate capacities to provide water to the school development that will be accommodated by the amendment. The school project has been exempted from the current moratorium, which will enable the CCSD and the involved regulatory and resource management entities to work towards resolving outstanding water supply issues. The Commission's approval of this project is consistent with the objective of resolving Cambria water supply issues through a cooperative interagency planning approach rather than prohibiting the construction of essential public services and hence is consistent with the cited Coastal Act sections. Conformance with the water resource protection requirements of the Coastal Act is also ensured by existing LCP requirements calling for the demonstration of adequate water prior to the approval of the coastal development permit that will be required for school development.

D. California Environmentally Quality Act (CEQA)

The Coastal Commission's review and development process for Local Coastal Programs and amendments to them has been certified by the Secretary of Resources as being the functional equivalent of the environmental review required by CEQA. Therefore, local governments are not required to undertake environmental analysis on LCP amendments, although the Commission can and does utilize any environmental information that the local government has developed. In this case, the Coast Unified School District certified an Environmental Impact Report (EIR) for the school development project. The environmental impacts identified in the EIR Modifications to the amendment have been considered, and additional impacts to coastal resources have been identified by the Commission's analysis. The Commission has identified where the mitigation measures recommended by the EIR, embodied in the development standards of the amendment, must be supplemented to prevent the amendment from having significant environmental effects for which feasible mitigation measures have not been employed consistent with the California Environmental Quality Act.

EXHIBIT G990007M:B

PROPOSED PLANNING AREA STANDARDS

1. Revise Chapter 8, North Coast Area Plan, Cambria Urban Area; Page 8-31, by adding new standards as follows, and adding new Figure 6 and renumbering all existing Figures as appropriate:

PUBLIC FACILITIES. The following standards apply only to lands within the Public Facilities land use category.

Site Specific Standards/Cambria Elementary School Site. Standards 1 through 13 apply only to the land shown in Figure 6.

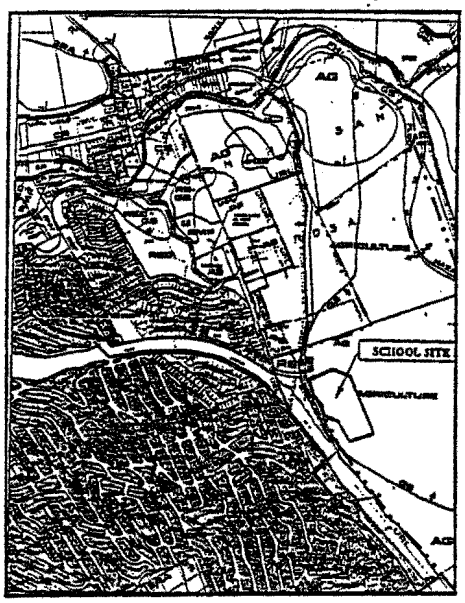


Figure 6

1. Limitation on Use. Allowable uses shall be limited to: Schools - pre to secondary

2. Setbacks. The following agricultural buffer on the site shall be provided with any development or land division.

   a. 20 to 50 foot width along the adjoining property line of the proposed site parcel.

   b. No structures used for human habitation shall be constructed in the buffer area.

3. Design Standards. The following design requirements apply to any new development or land division.

   a. The buildings shall be placed on the site with minimal use of cut and fill while meeting state design criteria and disabilities act considerations.

   b. The buildings architecture shall use best design standards to be consistent with the character of the community of Cambria.

EXHIBIT NO. 1, p.1
APPLICATION NO. SLO LCPA 2-01 Amendment Submittal

c. Any ancillary structures on the buildings such as air conditioning and electrical features shall be shielded from view, with screens that are part of the architectural design.

d. Architectural elevations showing exterior finish materials, colors, and heights above the existing natural ground surface shall be submitted with any application. Colors of the buildings and building materials shall minimize the structure massing of new development by reducing the contrast between the purposed development and the surrounding environment. Colors shall be muted to soften the appearance of the structures and to reduce visibility from scenic Highway 1, and shall be compatible with the natural colors of the surrounding environment, including vegetation, rock outcrops, etc. Darker, non-reflective, earth tone colors shall be selected for walls chimneys, etc. and darker green, gray, slate blue, or brown colors for the roof structures.

4. Lighting. A lighting plan showing the height, location, and intensity of all exterior lighting shall be submitted with any application for development and shall, at a minimum, comply with the following standards:

a. All light fixtures shall be shielded so that neither the lamp nor the related reflective interior surface is visible. All lights poles, fixtures, and hoods shall be dark colored. All exterior light sources shall be low-level and adjusted so that light is directed away from neighboring areas. The height of freestanding outdoor light fixtures shall be limited to 20 feet. Any security lighting shall be shielded so as not to create glare when viewed from neighboring areas. Light poles and fixtures shall not be obtrusive to travelers along Highway 1

5. Landscaping. A landscape plan meeting the requirements of Section 23.04.180 et seq. of the Coastal Zone Land Use Ordinance, and prepared by a qualified individual acceptable to the Department of Planning and Building, shall be submitted with any application for development. The landscape plan shall, at a minimum, include the following:

a. Vegetation that will provide 75 percent screening of new development after five years, including ancillary structures such as trash collection areas and maintenance structures when viewed from: Highway 1, north of Main looking east; Ardath Drive and Green Street intersection looking east; intersection of Main and Highway 1 looking east; and Highway 1, south of Main and Highway 1 looking north. This requirement shall be certified by the individual who prepared the plan. The landscape plans shall show clusters of trees and the use of shrubs with trees that vary in height such that the appearance of a stockade ringing the project will be reduced. Landscaping around the playground areas shall transition into the surrounding grazing land. Parking areas shall include landscaped berms or other measures to ensure that parked cars are screened as much as possible from view of travelers along Highway 1.

b. Landscape screening along Highway 1 to screen views of any development to northbound and southbound travelers, including additional screening (shrubs and ground cover) planted prior to any site disturbance along the frontage of Highway 1 between Highway 1 and Main Street to screen views from the scenic highway. Existing trees planted by the Land Conservancy and additional screening shall be shown on the landscape plan. The trees and screening materials shall blend in with the existing trees along Highway 1, and shall be consistent with community of Cambria tree selections.

c. The use of native plant species and ornamental species that are drought-tolerant and/or have low irrigation requirements, are fire resistant and are tolerant to the use of recycled water. Subsurface irrigation of any play fields should be investigated as a method to reduce evaporation losses and allow for the use of fields during irrigation.

d. An aggressive tree planting and landscape plan using species endemic to the area, in coordination with the APCD to specifically address the use of deciduous and evergreen trees, planted so that they shade structures in summer, decrease indoor temperatures, and reduce energy demands for air conditioning and fossil fuel emission.

e. Compliance with the County of San Luis Obispo and the Cambria Community Services District requirements concerning the installation and use of reclaimed water systems for the landscape irrigation such as the installation of rain water cisterns to collect and re-use runoff. The cisterns and piping shall be appropriately sized to be used as reservoirs for reclaimed water from the purple pipe system after runoff water has been used. To avoid potential cross connection, the irrigation system must be separate from all potable service and have a separate meter. When a recycled water system is available and prior to use, the plumbing system shall be tested to ensure that there is no cross connections between irrigation and potable piping. Additional precautions include separate potable plumbing to drinking fountains in playing fields.

f. As a condition to approval of any development, a qualified individual shall be retained to monitor the new landscaping for no less than five years to ensure that it meets the goals of screening. A status report shall be submitted to the Department of Planning and Building annually. Any necessary remedial measures identified in the status reports shall be completed within 60 days of the completion of the report.

6. Cultural/Historic Resources. In the event that cultural or historic material is discovered during construction activities, all construction in the affected area shall cease until the find is evaluated by a qualified archeologist/historian approved by the Department of Planning and Building.

7. Grading, Drainage and Erosion Control Plans. Grading, drainage and erosion control plans meeting the requirements of Section 23.05.020 et. seq. of the Coastal Zone Land Use Ordinance shall be submitted with any application for development. The plans shall, at a minimum, include the following:

a. A drainage and erosion control plan (including submittal of drainage calculations) and storm water pollution prevention plan for the agencies review and approval by the County Department of Planning and Building in consultation with the County Public Works Department, and the Regional Water Quality Control Board. Any dewatering system, drainage diversion or other temporary construction measures designed to reduce runoff and sedimentation from leaving the site shall be included in the submittal.

b. Appropriate erosion control measures during construction, including limiting construction activities to dry weather to avoid increased surface water runoff and erosion on-site, and sedimentation of nearby drainages, installation of appropriate

erosion control devices (i.e. hay bales, silt fences) around the perimeter of each construction zone and area experiencing disturbances of the ground surface and monitoring of the erosion control devices on a daily basis by construction personnel, and periodically by the biological monitor, to ensure proper function.

c. Minimizing of grading to create cut and fill slopes that are not obtrusive to travel along Highway 1.

d. Delineation of the vertical height of all cut and fill slopes with the border of cut slopes and fills rounded off to a minimum radius of five feet. All cut or fill areas shall vary in height to look natural (undulate) and in no case shall exceed a slope of 2:1.

e. Location of soil stockpiles in areas that do not have potential to experience significant runoff during the rainy season.

f. Revegetation of all disturbed and barren areas immediately following completion of construction-related activities with appropriate native vegetation to reduce the risk of erosion from the site. Areas experiencing temporary disturbance should be replanted with native species that are characteristic of habitats of the project area.

g. Provisions for a Certified Engineering Geologist to inspect the cut slopes at the completion of rough grading to ensure that no unforeseen conditions are present. If slope instabilities are present that pose a hazard to persons or structures, the project Engineering Geologist shall provide recommendations to eliminate the identifies hazards.

8. Sewer/water facilities. Any development shall provide water supply and sewage disposal systems designed as follows:

a. Water efficient plumbing features, including all Cambria Community Services District standards for plumbing fixtures.

b. All water lines shall be designed and installed in accordance with the requirements of the County of San Luis Obispo and the Cambria Community Services District. The water line will be a "dead-end line. Fire flows must considered when designing these pipelines.

c. In the event of a stage 1 or greater water supply condition, Cambria Community Services District-requested standby water conservation programs shall be implemented.

9. Wetland Mitigation Plan. The wetland mitigation plan and monitoring program, in the form of a section 404 permit and a resultant wetland mitigation program, shall be approved by Army Corps of Engineers and the California Coastal Commission to compensate for the loss of wetland and other water habitats on the site and shall be submitted with any application for development. Army Corps and the Commission shall be consulted with to determine acceptable mitigation ratio for wetlands replacement. Mitigation ratios of 2:1 for wetland impacts and 1:1 for other water impacts are typically required. The wetland mitigation plan shall, at a minimum:

a. Specify the type of mitigation selected (e.g., creation of new wetlands, enhancement, dedication, or land banking of existing wetlands, or paying of in lieu fees)

b. The method of determining amount of mitigation (e.g., fees, amount of replacement dedication).

c. If wetlands are to be enhanced or replaced, the mitigation plan shall specify the location, condition method of improvement, maintenance and success criteria.

d. A monitoring plan shall be approved by the County Department of Planning and Building. The monitoring plan shall include, goals, responsibilities, authorities, and procedures for verifying compliance with environmental mitigation; lines of communication and reporting methods; daily and weekly reporting of compliance; construction crew training regarding environmental sensitivities; authority to stop work; and action to be taken in the event of non-compliance.

10. Drainage basin and drainage swales. Any proposed drainage basins and/or drainage swales that convey runoff shall be designed to act as wetland habitat. Drainage basins shall be designed to have gently sloping sides to allow establishment of riparian and wetland vegetation along the banks, and the outlet shall be placed at a height that will retain some water in the basin after storm flows pass. Swales shall be revegetated with native wetland species appropriates to the area; such as juncus.

11. Construction vehicle activities. Any development shall include an appropriately marked staging areas. Staging, re-fueling, and maintenance of vehicles will be performed only in those marked areas. Cleaning and refueling of equipment and vehicles will be avoided during rainy conditions in order to reduce the potential for inadvertent release of fuel or other contaminants from construction areas to aquatic habitats.

12. Traffic and Circulation. Roadway, pedestrian, bicycle and transit related improvements shall be required as part of the discretionary approval review process and shall be consistent with county standards and shall be reviewed and approved by the County Public Works Department. An encroachment permit for any approved alteration or work within the right-of-way is required. Realignment of Main Street may require obtaining an encroachment permit from Caltrans. Improvements shall be shown on any application submittal and shall include at a minimum:

a. Realignment of Main Street to accommodate road improvements. This may require moving the existing road to the west approximately 20 to 30 feet in order to improve Main Street alignment and accommodate the entrance driveway as to width and vertical profile.

b. A left-turn lane into the driveway

c. Eight foot shoulder on Main Street to accommodate right turns and bicycles.

d. Emergency access connection to the private road opposite Ardath Drive.

e. A safe access route along Main Street designated for students.

f. Any driveway entrances shall be designed to accommodate the turning radius for busses, delivery trucks, fire trucks and garbage trucks. The vertical profile of the driveway must accommodate busses and other vehicles with longer rear overhang such that these vehicles do not "bottom out" when entering or exiting the driveway.

g. Site enhancements to promote pedestrian, bicycle, and transit accessibility to the site's design.

h. County of San Luis Obispo traffic fees established for Cambria to offset cumulative impacts to Highway 1 as required by County Code Title 13.01.010-060, and allocation fees as determined by the County Engineer, shall be paid prior to commencement of any construction.

13. Air Quality. During construction, the following Best Available Control Technology for diesel fueled construction equipment and dust control measures shall be implemented where feasible. As a condition to development, the Department of Planning and Building shall be notified, by letter, of the status of the following measures, and shall clearly state why any measures not taken are infeasible.

Diesel-fueled construction equipment

a Use of CARB motor vehicle diesel fuel. All off-road and portable diesel power equipment shall be fueled exclusively with CARB certified diesel.

b. Electrify equipment where possible.

c. Maintain equipment in tune per manufacturer's specifications, except as other wise required above.

d. Install catalytic converters on gasoline-powered equipment.

e. To the extent feasible use Compressed Natural Gas (CNG) or propane on site mobile equipment instead of diesel-powered equipment.

Dust control

a. Reduce the amount of disturbed area where possible.

b. Use water trucks or sprinkler systems in sufficient quantities to prevent airborne dust from leaving the site. Increased watering frequency will be required whenever wind speeds exceed 15 mph. Reclaimed (non-potable) water should be used whenever possible.

c. All dirt stockpile areas should be sprayed daily as needed.

d. Permanent dust control measures identified in the approved project revegetation and landscape plans should be implemented as soon as possible following the completion of any soil disturbing activities.

e. Exposed ground areas that are planned to be reworked at dates greater than one month after initial grading should be sown with fast-germinating native grass seeds and watered until vegetation is established.

f. All disturbed soil areas not subject to revegetation shall be stabilized with approved chemical soil binders, jute, netting, or other methods approved in advance by the APCD.

g. All roadways, driveways, sidewalks, etc., should be paved as soon as possible. In addition, building pads should be laid as soon as possible after grading unless seeding or soil binders are used.

h. Vehicle speeds for all construction vehicles shall not exceed 15 mph on any unpaved surface at the construction site.

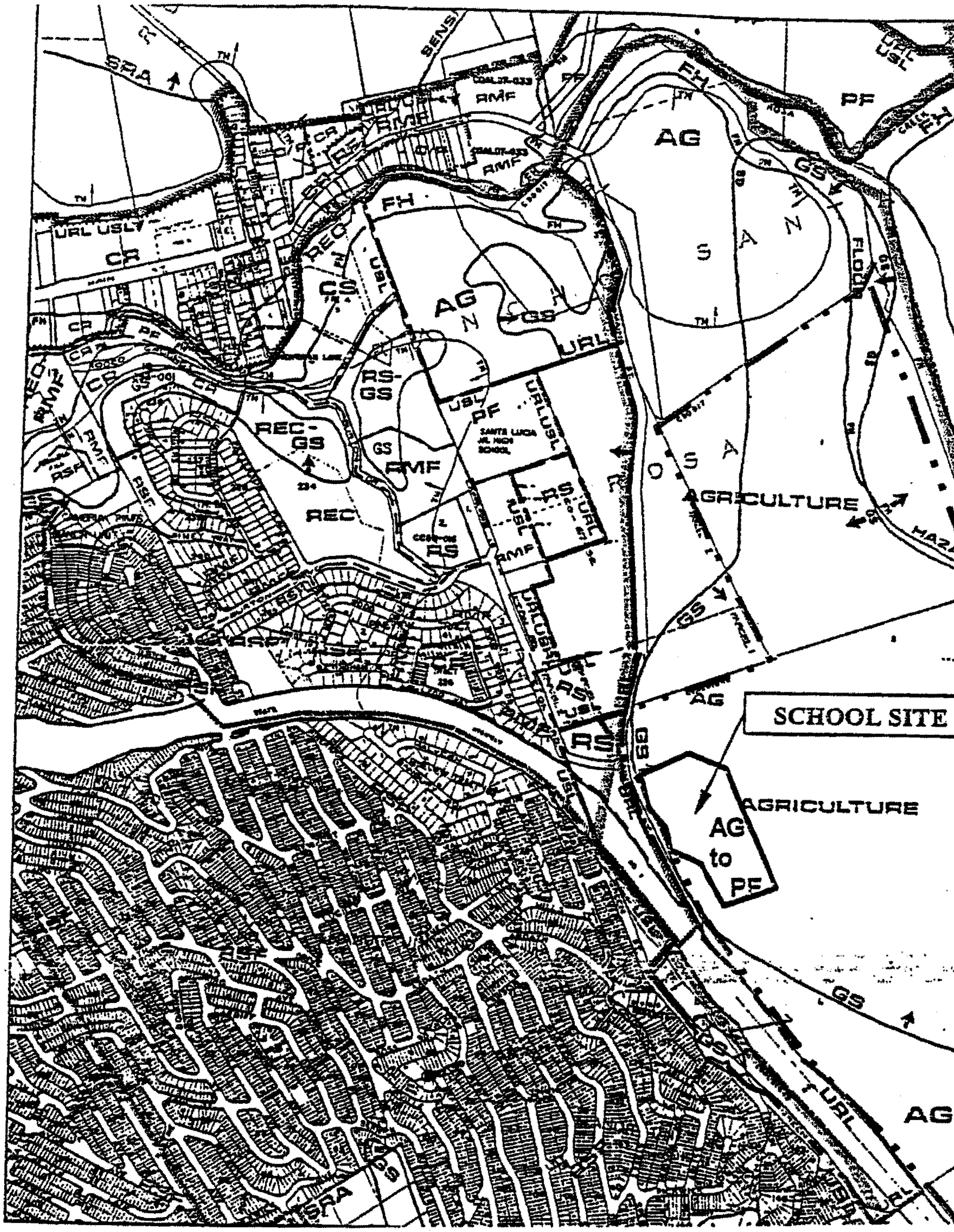


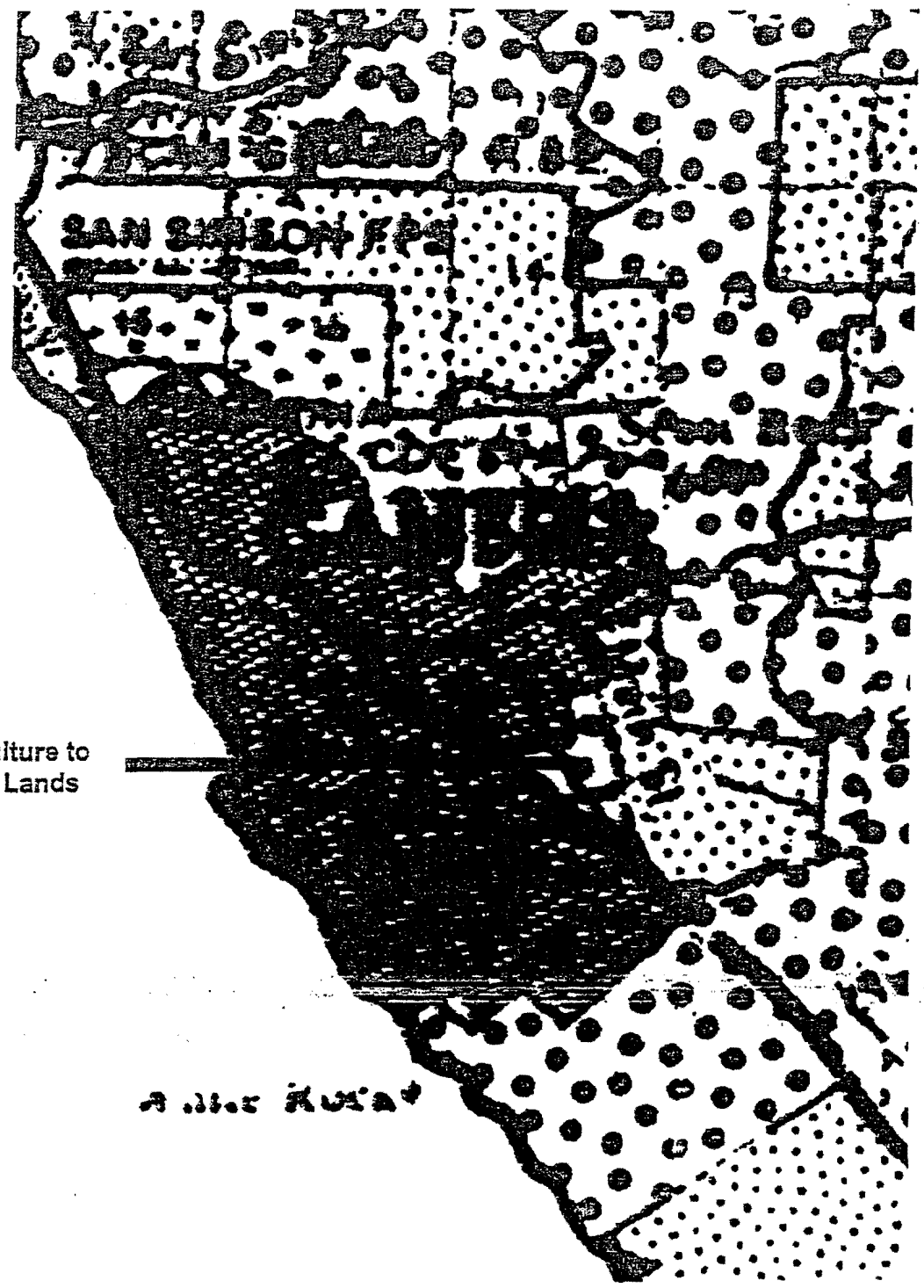
EXHIBIT G990007M:C

INITIATING A PRECISE LAND USE DESIGNATION AS SHOWN ON OFFICIAL LAND USE CATEGORY MAP ON FILE IN THE DEPT. OF PLANNING AND BUILDING

CHANGE FROM AG TO PF

COAST UNIFIED SCHOOL DISTRICT
GENERAL PLAN AMENDMENT

CCC Exhibit 1
(page 7 **of** 9 **pages)**



From
Agriculture to
Urban Lands

note: This is not a part of the LCP

EXHIBIT G990007M:D

AGRICULTURE AND OPEN SPACE ELEMENT

CHANGE FROM Agriculture to Urban Lands

COAST UNIFIED SCHOOL DISTRICT
GENERAL PLAN AMENDMENT

CCC Exhibit 1
(page 8 **of** 9 **pages)**

EXHIBIT
G990007M:E

ADD ELEMENTARY SCHOOL LABEL TO COMBINING DESIGNATION MAP

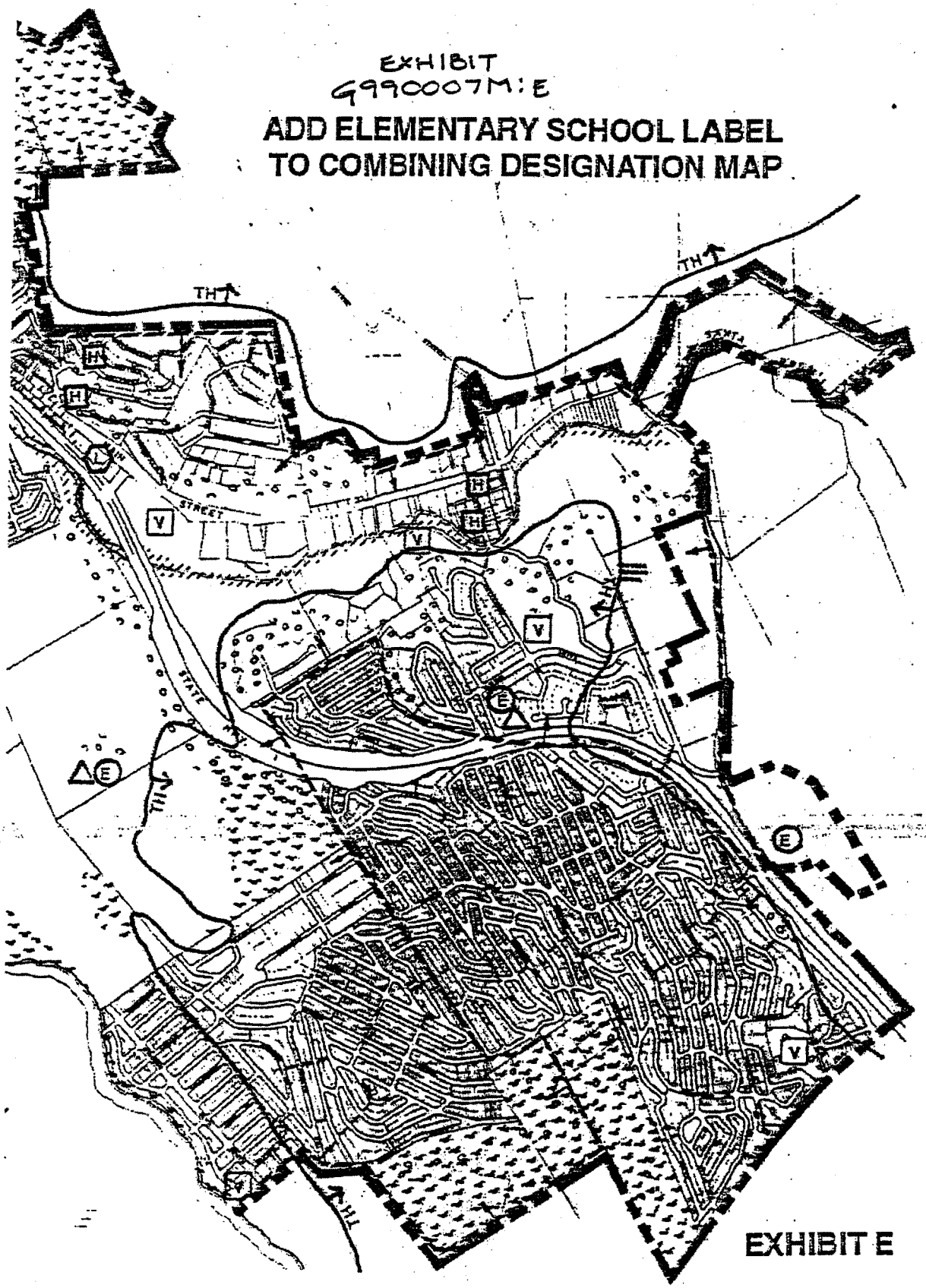
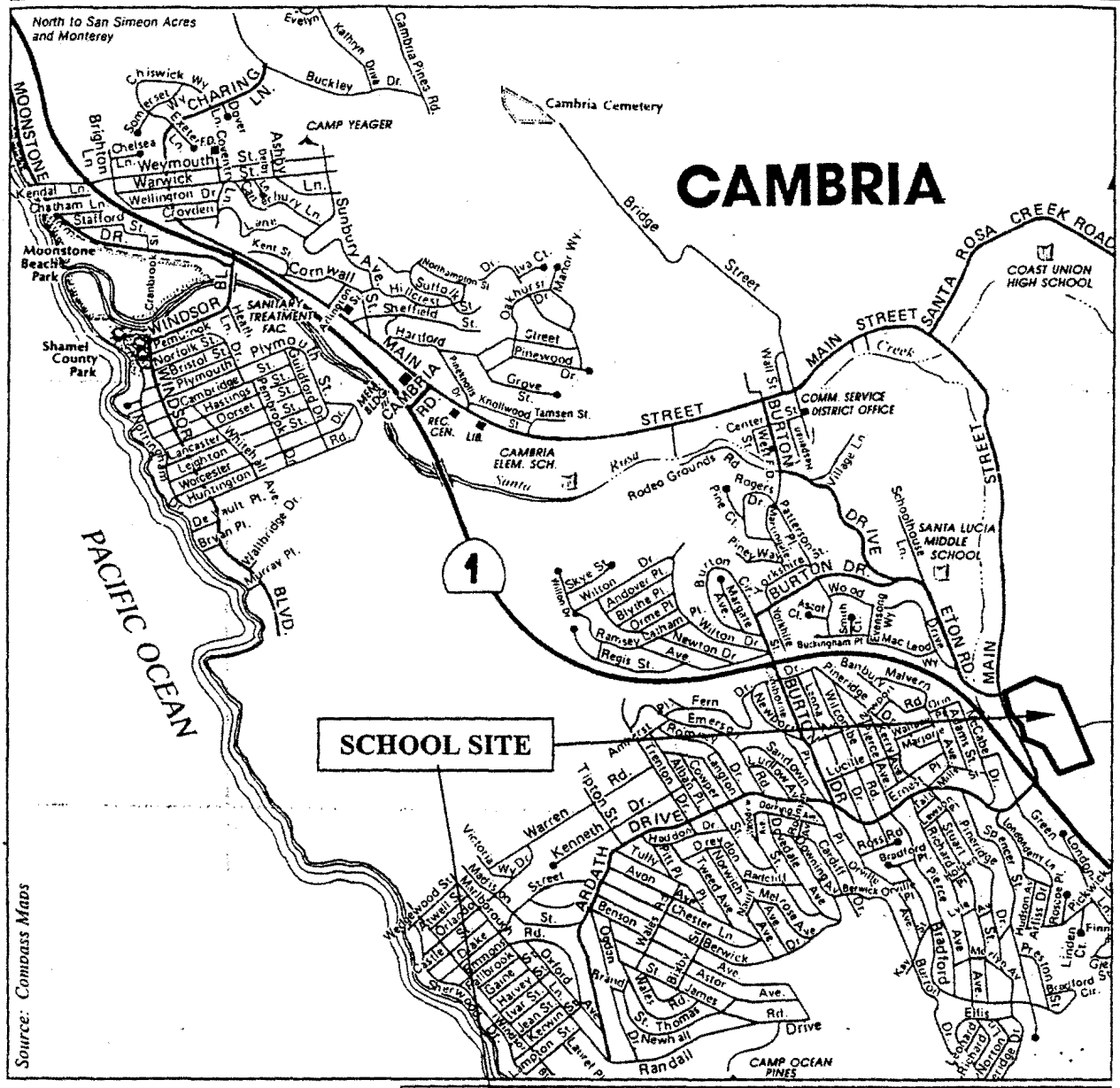
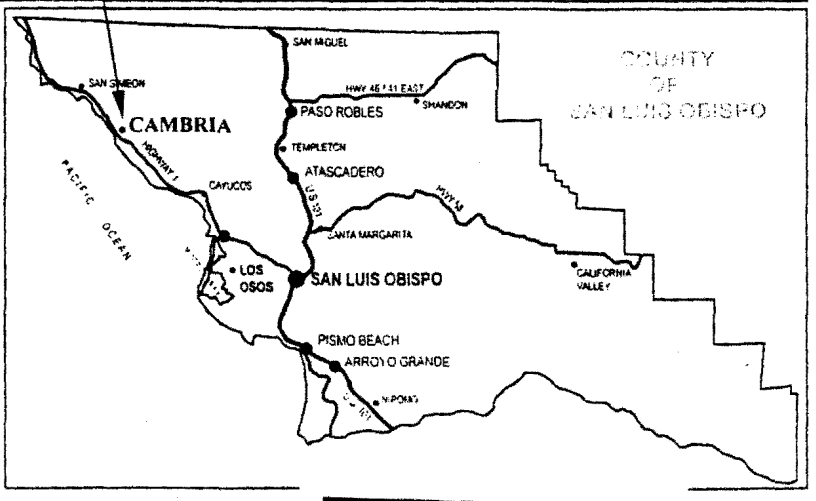


EXHIBIT E

CCC Exhibit 1
(page 9 **of** 9 **pages)**

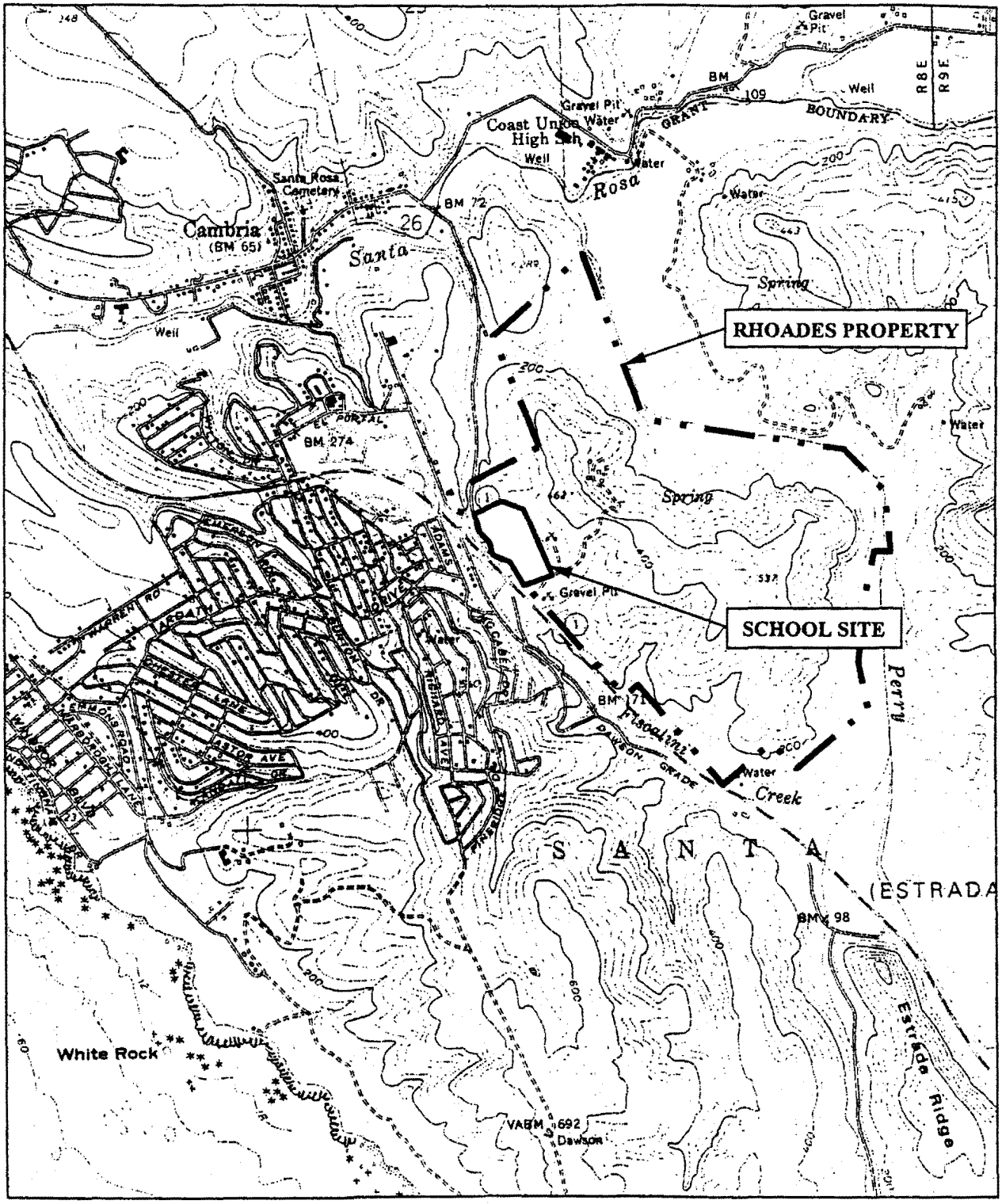




NORTH
Not to Scale

TY MAP
RE III-1

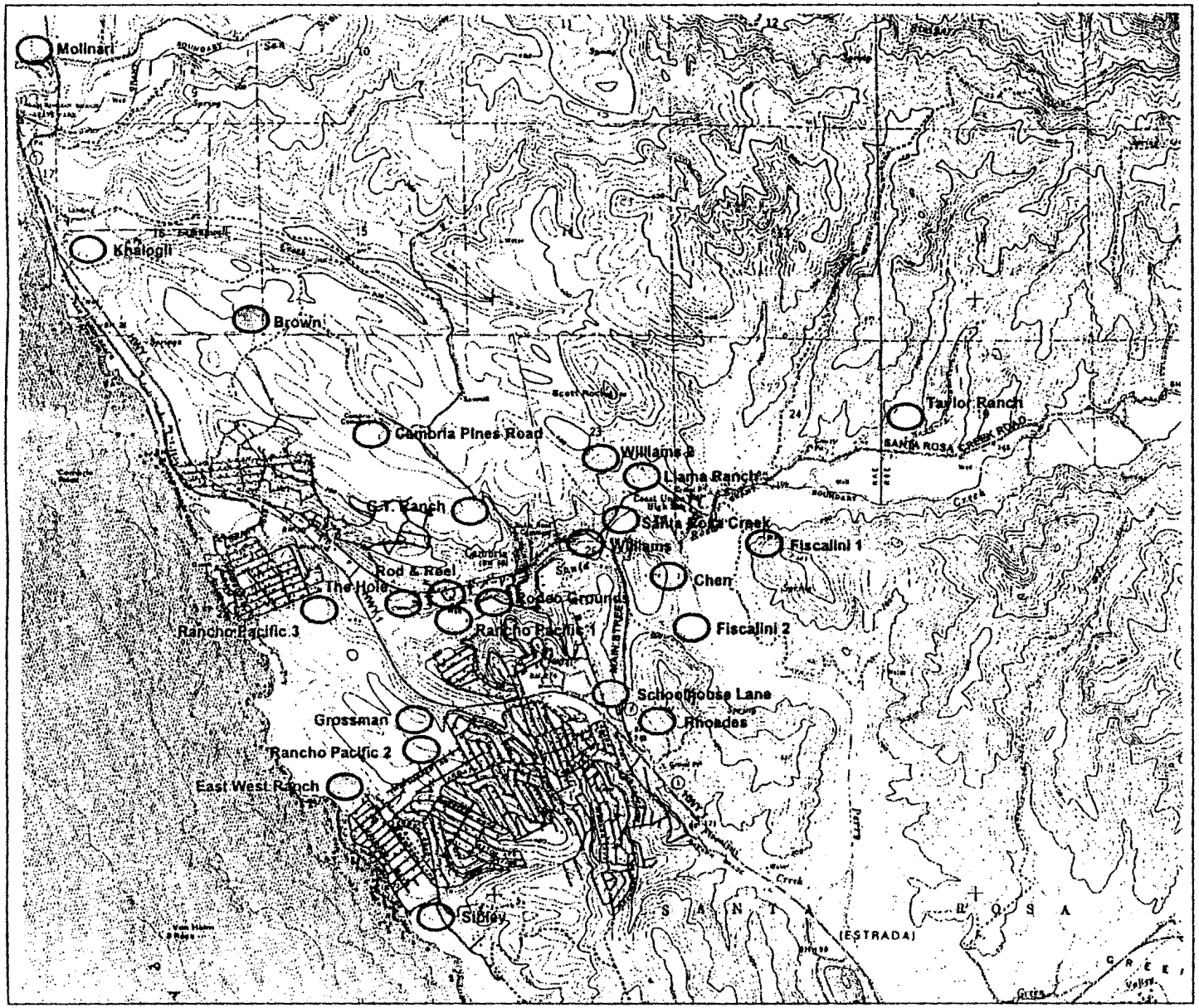
EXHIBIT NO. 2, p.1
APPLICATION NO. SLO LCPA 2-01
Location Maps



NORTH
Not to Scale

PROJECT LOCATION MAP
FIGURE III-2

CCC Exhibit 2
(page 2 of 2 pages)



A checklist review of all alternative school sites is included in Appendix K.

Alternatives reviewed in more detail in Section VI

EXHIBIT NO. 3
APPLICATION NO. 5-10-CCPA 2-01
Alternative Site Locations

NORTH
Not to Scale

ALTERNATIVE SCHOOL SITE LOCATION MAP
FIGURE VI-1

DELAINE EASTIN
State Superintendent of Public Instruction

[redacted]

April 19, 2000

Denis de Clerq, Director of Facilities
Coast Unified School District
2950 Santa Rosa Creek Road
Cambria, California 93428

Dear Mr. de Clerq:

A year ago, on April 23, 1999, I saw and evaluated two five-acre parcels adjacent to Santa Lucia Middle School as one of ten candidate sites for the new elementary school. On July 15, 1999, I walked and evaluated an eleventh site east of the intersection of Highway 1, Main Street and Ardath Drive. The former site I have referred to as the Santa Lucia II site; the latter as the Rhoades site. You have asked me to discuss the suitability of the Santa Lucia II site as an alternative to the Rhoades site for the new elementary.

I think the salient considerations fall easily into three categories: school district facilities master planning, traffic hazards, and engineering challenges.

School District Facilities Master Planning The most intractable reality is the need for sufficient land at both the new elementary school and at Santa Lucia Middle School. For my report of April 23, 1999, on the candidate elementary school sites, I calculated the need, pursuant to state standards, for 9.9 net useable acres for the master planned K-5 student population of 550 students. The Santa Lucia II site I estimate to have no more than 7 net useable acres after the necessary civil engineering has been finished. The Rhoades site is large enough that sufficient land for a 9.9-acre campus can be outlined. Three acres to an elementary school means the difference between having sufficient field areas, hardcourts and playground apparatus areas for the students or not; because two-story construction, a design option often used to maximize utilization of a site, will save less than one-half acre.

Moreover, Santa Lucia Middle School does not presently have enough useable acreage for its present 6-8 population of somewhat over 200 students. State standards indicate the need for 6.2 net useable acres where football and track are not part of the curriculum, or 8.2 useable acres when they are. Revised Title 5 Regulations are expected to be ratified later this spring. These acreage standards will then increase to 6.7 and 9.1, respectively. The present site has approximately 5.5 net useable acres. It is my guess that Cambria will not be immune from the continuing and projected population increases in California, and that the middle school population will rise accordingly. As I have mentioned before, I believe the school district may want to consider acquiring one or both of the adjacent 5-acre parcels to add to Santa Lucia Middle School. This would bring the campus up to state standards and it would help prepare the school district to meet the future.

April 19, 2000

Traffic Hazards Traffic congestion on Schoolhouse Lane in front of Santa Lucia Middle School is already a reality before and after school. The intersection of Schoolhouse Lane, Eaton Road and Burton Drive, about 700 feet from the entrance to the school, is a narrow hilltop intersection further disadvantaged by precarious visibility and, before and after school, by a lot of vehicles. Rainy weather makes the problems worse. Adding a new elementary school between the middle school and the intersection will assuredly require significant traffic mitigation. Adding the acreage to the middle school will not make accessibility worse.

The Rhoades site is not free from traffic concerns, but the intersection of Highway 1, Ardath Drive, and Main Street has good visibility and is controlled by a signal. A crosswalk exists on the south side of the traffic light, which students living within walking distance on the west side of Highway 1 may use. Busing would be the primary means for students to get to and from school.

Engineering Challenges I note in my report to you on the Santa Lucia II site that I said "The site is approvable only with an appropriate site development plan to mitigate the steep grades." I am not convinced that the steep slopes on the property can effectively be terraced to provide building pads and playfields for an elementary school. Major earthmoving and engineered retaining walls would no doubt be required to provide stable building foundations and playfields of adequate width. If this is possible, it will be expensive. In addition, the campus would have to be accessible for all, which would require several mechanical lifts for students and teachers unable to walk. Annexing the property to Santa Lucia Middle School would mean meeting the same challenges as far as playfields, only, are concerned.

The Rhoades site is less than flat, but also less steeply sloped than the Santa Lucia II site. I saw the big engineering problem there to be drainage of the site and surrounding watershed, as a ravine runs through the property now. If some portion of the school grounds sat astride this draw, an underground drainage channel of some type would need to be constructed.

I hope this has been of help to you. I would be pleased to discuss the comparison further. The Rhoades and Sibley sites were the best of the eleven candidate sites, followed by the Brown and Khaloghli properties. The Santa Lucia II, Taylor and Williams sites were in a third echelon, and overall about equal in their potential as schoolsites, though very differently endowed. Please contact me if I can assist you more.

Sincerely,

George M. Shaw, CDE Consultant
School Facilities Planning Division
ph.: 805-692-9913
sfpdgshaw@aol.com

GMS

CCC Exhibit 4
(page 2 of 2 pages)

FITZHUGH W RANCH
Walter & Judith Fitzhugh
Phone 805-927-8353 Fax 805-927-2625

2650 Eton Rd
Cambria CA.
93428-4102

June 24, 2001

Steve Monowitz
California Coastal Commission Staff
California Coastal Commission
725 Front Suite 300
Santa Cruz, CA. 95060-4508

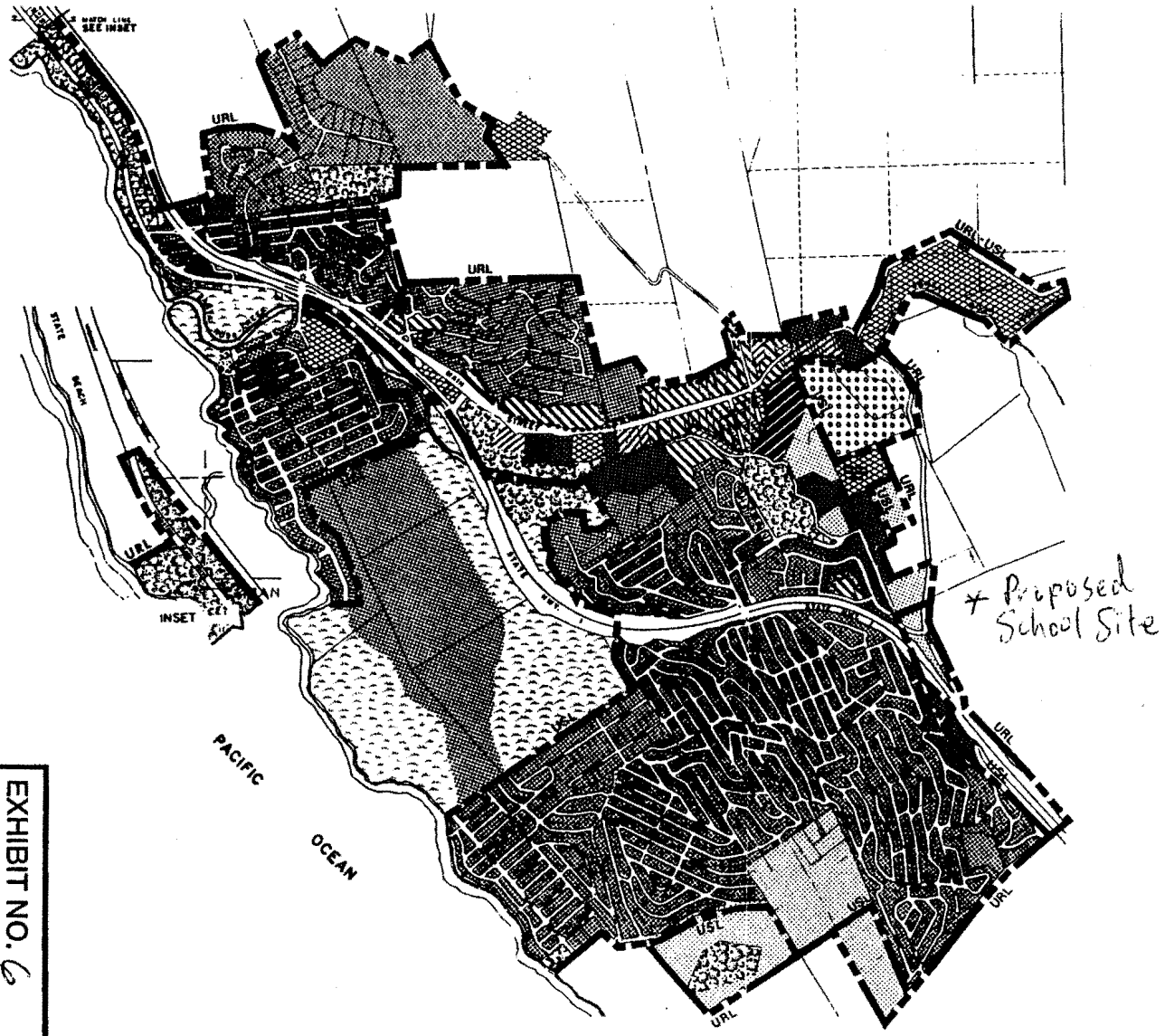
Dear Steve;

SUBJECT: Calif. Coastal Commission Staff Recommendation for Cambria Elementary School sight

It has been brought to our attention that the Calif. Coastal Commission Staff has recommended that the new sight for the new school in Cambria be located on property next to the Santa Lucia Jr. High School on Schoolhouse Ln. in Cambria, with road access to be constructed from the east side of the sight to Main St. This proposed road would cut across our ranch land. This land is zoned agricultural land. and is under Williamson Act Contract. Also it is outside of the Urban Reserve Line and Urban Services Line and designated a Scenic View Corridor and Scenic Area as part of the Eastern Gate Way to Cambria by the Cambria Design Plan . By putting the road across the ranch land it would split off half or more of the pasture land making cattle movement from one pasture to another impossible. The area where the road would have to be constructed would be located in a wet land. By placing the road across the ranch would split up the property leaving the only alternative is to sell that unusable portion of the ranch. We are also in the process of trying to get a Conservation Easement on the ranch. With the possibility of such a development we may not be able to get an easement. It would be our hope that the Calif. Coastal Commission Staff would not adopt this school sight plan and road access that would cause harm to wet lands, destroy possible habitat for the Red Legged Frog, spoil scenic view shed and split up a ranch's grazing land

Sencirely
Walter Fitzhugh
Judi Fitzhugh
Joy Fitzhugh

CC Cambria School Dist.
Dist 2 Supervisor Shirley Bianchi
SLO CO. Board of Supervisors



LEGEND

LAND USE CATEGORIES

- AGRICULTURE
- RURAL LANDS
- RECREATION
- RESIDENTIAL RURAL
- RESIDENTIAL SUBURBAN
- RESIDENTIAL SINGLE FAMILY
- RESIDENTIAL MULTIPLE FAMILY
- OFFICE & PROFESSIONAL
- COMMERCIAL RETAIL
- COMMERCIAL SERVICE
- INDUSTRIAL
- PUBLIC FACILITIES
- OPEN SPACE

BOUNDARIES

- URBAN RESERVE LINE (URL)
- URBAN SERVICES LINE (USL)
- VILLAGE RESERVE LINE (VRL)
- PLANNING AREA
- CENTRAL BUSINESS DISTRICT

SCALE 0 1600' NORTH N

NOTE:
This map is for reference purposes only. Official maps, showing precise property lines and land use category boundaries, are on file in the Planning Department.

THIS MAP APPLIES ONLY TO AREAS WITHIN THE LCP AREA

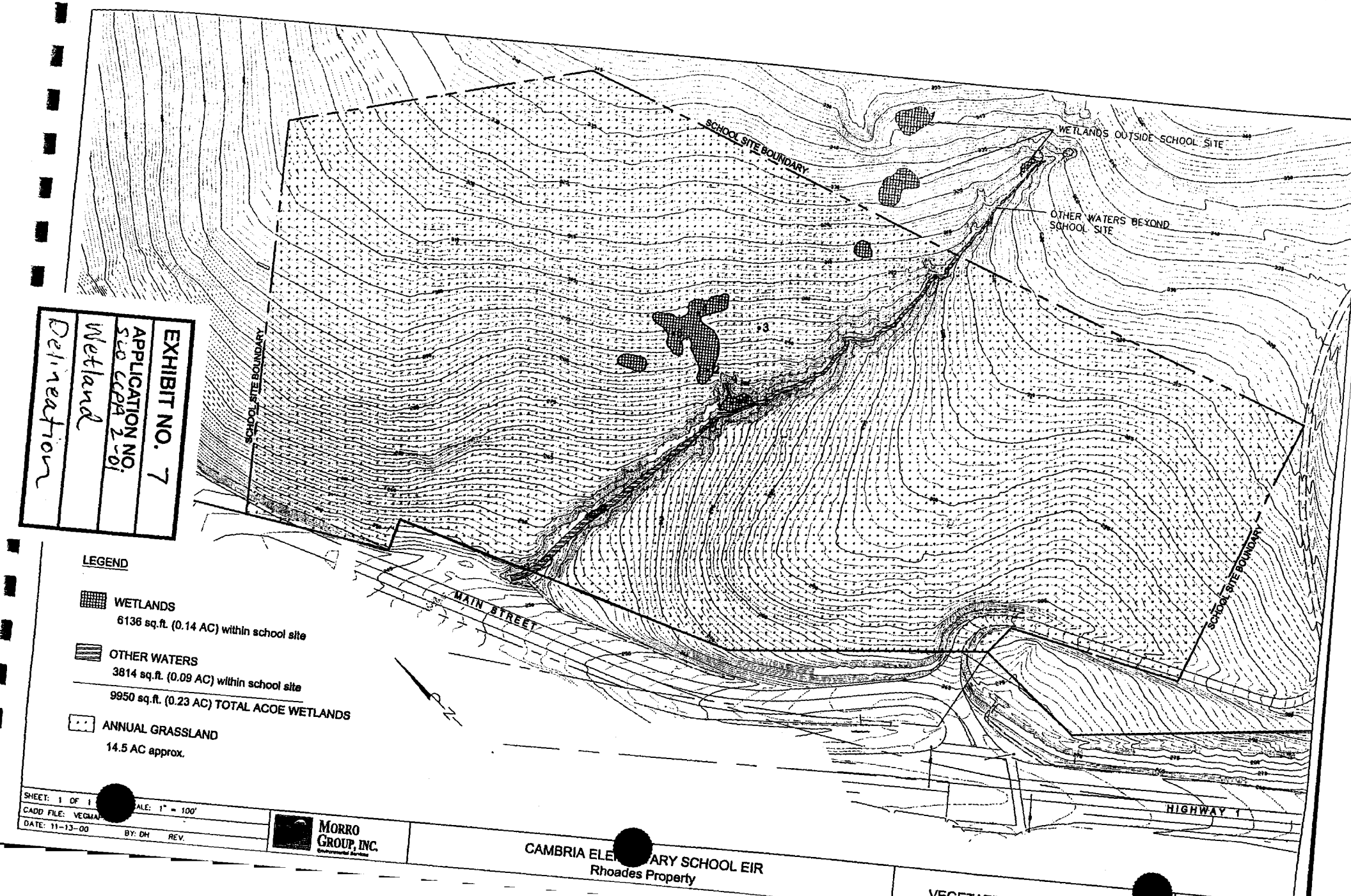
CAMBRIA

LAND USE CATEGORIES

San Luis Obispo County Planning Department
Revised: 2-8-94

8

EXHIBIT NO. 6
APPLICATION NO. SLO LCPA 2-01
Existing USL + URL Lines


SCHOOL SITE BOUNDARY
WETLANDS OUTSIDE SCHOOL SITE
OTHER WATERS BEYOND SCHOOL SITE
SCHOOL SITE BOUNDARY
SCHOOL SITE BOUNDARY
MAIN STREET
HIGHWAY 1
LEGEND
WETLANDS
6136 sq.ft. (0.14 AC) within school site
OTHER WATERS
3814 sq.ft. (0.09 AC) within school site
9950 sq.ft. (0.23 AC) TOTAL ACOE WETLANDS
ANNUAL GRASSLAND
14.5 AC approx.
EXHIBIT NO. 7
APPLICATION NO. SLO CCPA 2-01
Wetland Delineation
SHEET: 1 OF 1
CADD FILE: VEGMA
DATE: 11-13-00
BY: DH
REV.
SCALE: 1" = 100'
MORRO GROUP, INC.
CAMBRIA ELE ARY SCHOOL EIR
Rhoades Property

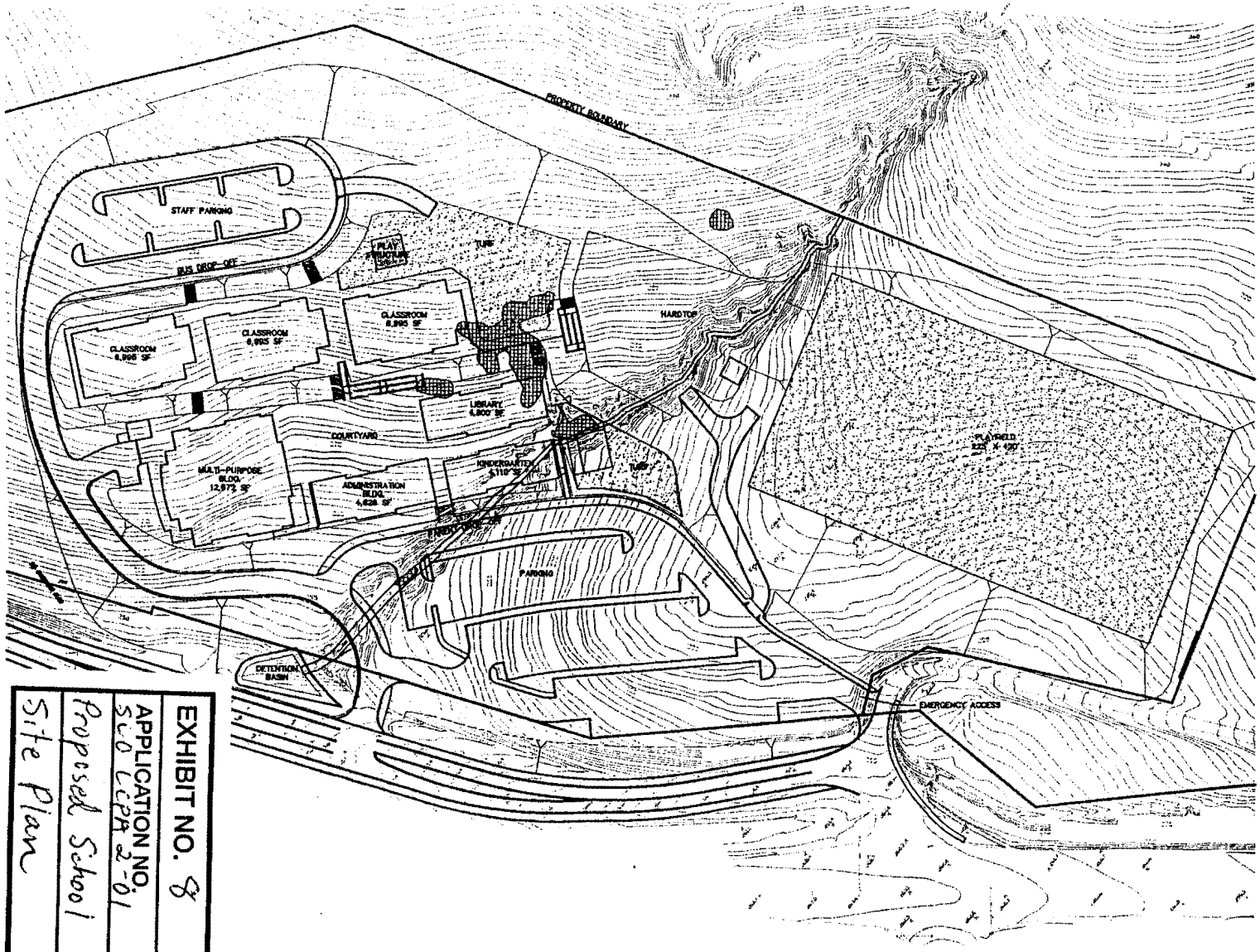


EXHIBIT NO. 8
APPLICATION NO. 5-00 LCPA 2-01
Proposed School Site Plan

Application Site Plan

Statistics:

KINDERGARTEN

Turf Area:	4356 sf	.10 Ac
Hardtop:	1307 sf	.03 Ac
Play Structure:	871 sf	.02 Ac
Buildings & Grounds:	5227 sf	.12 Ac
Subtotal:	11,761 sf	.27 Ac

GRADES 1-5

Play Field:	128,937 sf	2.96 Ac
Hardtop:	21,780 sf	.50 Ac
Play Structure:	5,227 sf	.12 Ac
Buildings & Grounds:	102,802 sf	2.36 Ac
Parking & Roads:	130,608 sf	3.00 Ac
Subtotal:	389,354 sf	8.9 Ac

Gross Site Acreage:	14.6 Ac
Total Usable Acreage:	9.2 Ac
% of Usable Acreage:	80 %
Graded Slopes:	3.7 Ac
% of Graded Slopes:	25 %

Legend:

- TURF AREA
- HARDTOP, PARKING, & ROADS
- WALKS & COURTYARDS
- PLAY STRUCTURE
- WETLAND HABITAT

north
Scale: 1"=100'-0"

RRM DESIGN GROUP

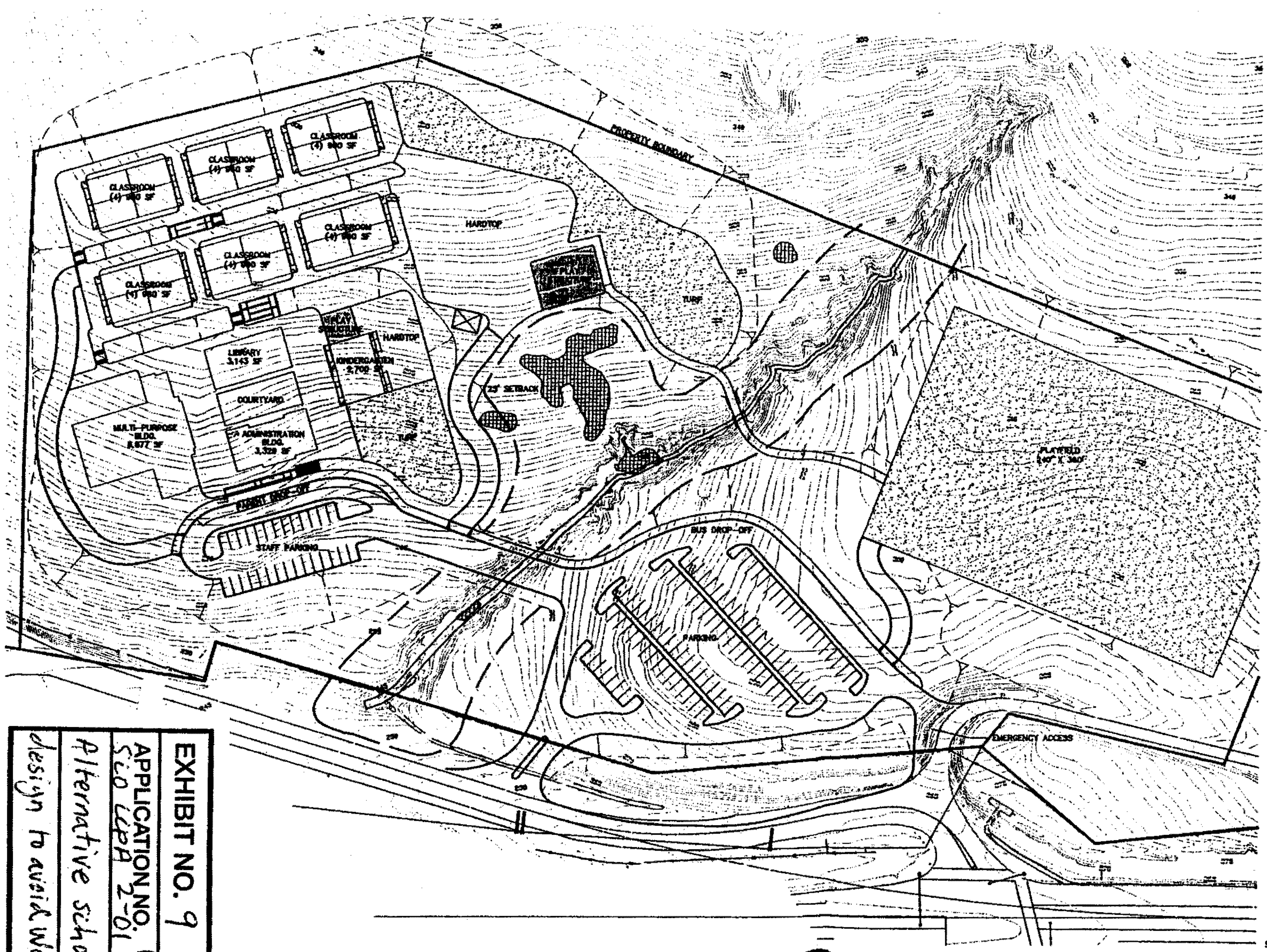


EXHIBIT NO. 9
APPLICATION NO. SLO LCPA 2-01
Alternative school design to avoid wetland

Alternative #2

Statistics:

KINDERGARTEN

Turf Area:	8665 sf	0.2 Ac
Hardtop:	4491 sf	0.1 Ac
Play Structure:	900 sf	.02 Ac
Buildings & Grounds:	3004 sf	.07 Ac
Subtotal:	17,060 sf	0.4 Ac

GRADES 1-5

Play Field:	112,727 sf	2.6 Ac
Hardtop:	22,025 sf	0.5 Ac
Play Structure:	3,078 sf	.07 Ac
Buildings & Grounds:	78,930 sf	1.8 Ac
Parking & Roads:	97,162 sf	2.2 Ac
Subtotal:	313,922 sf	7.2 Ac

Gross Site Acreage:	14.6 Ac
Total Usable Acreage:	7.6 Ac
% of Usable Acreage:	52 %
Graded Slopes:	3.3 Ac
% of Graded Slopes:	23 %

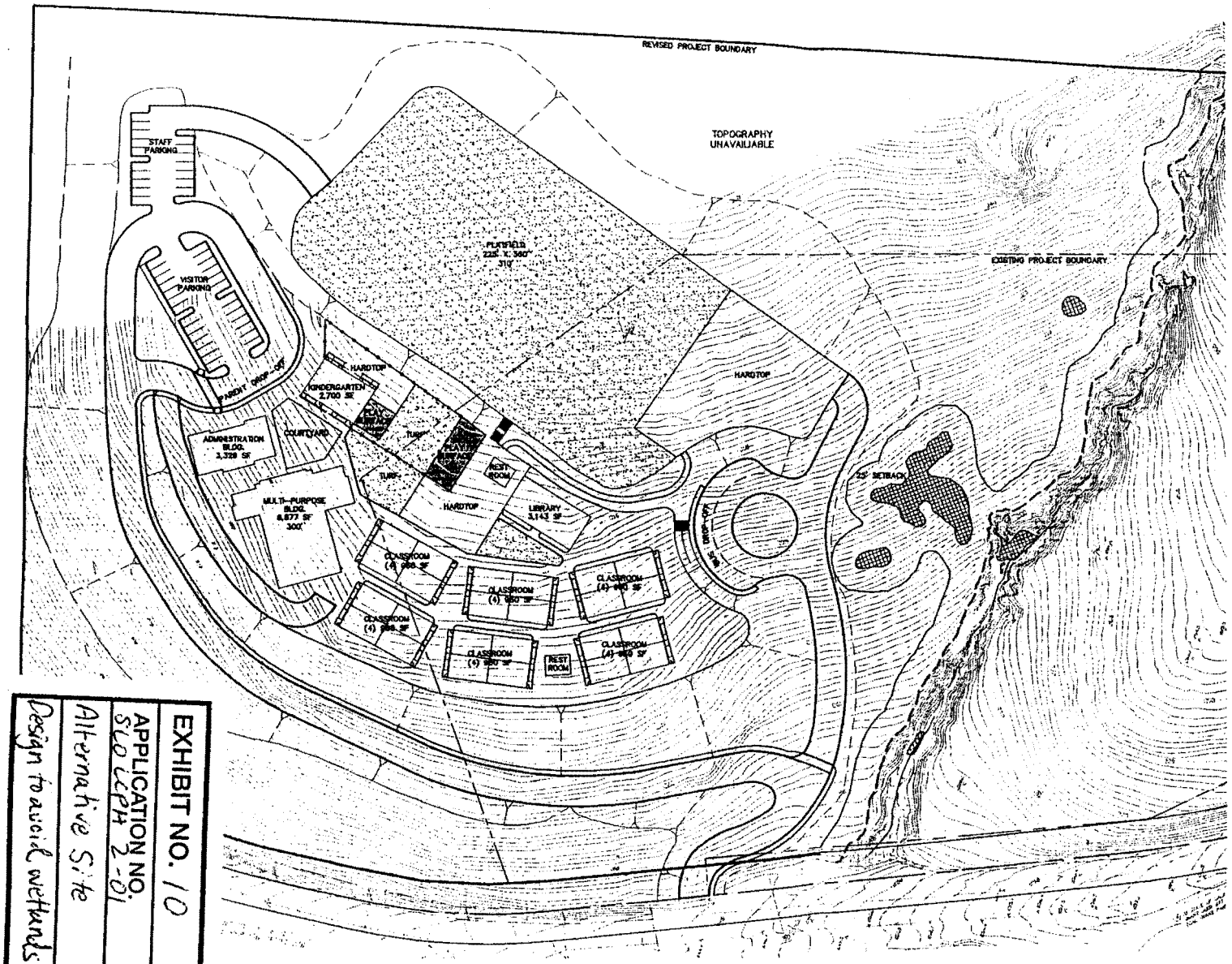
Legend:

▨	TURF AREA
☐	HARDTOP, PARKING, & ROADS
☐	WALKS & COURTYARDS
■	PLAY STRUCTURE
▦	WETLAND HABITAT

north
Scale: 1" = 100'-0"

RRM DESIGN GROUP

Cambria Elementary School



Alternative #3

Statistics:

KINDERGARTEN

Turf Area:	4163 sf	.10 Ac
Hardtop:	2869 sf	.07 Ac
Play Structure:	900 sf	.02 Ac
Buildings & Grounds:	3004 sf	.07 Ac
Subtotal:	10,937 sf	.25 Ac

GRADES 1-5

Play Field:	97,161 sf	2.2 Ac
Hardtop:	26,260 sf	0.6 Ac
Play Structure:	2040 sf	.05 Ac
Buildings & Grounds:	106,665 sf	2.5 Ac
Parking & Roads:	95,703 sf	2.2 Ac
Subtotal:	327,829 sf	7.5 Ac

Gross Site Acreage:	19 Ac
Total Usable Acreage:	7.8 Ac
% of Usable Acreage:	41%
Graded Slopes:	4.5 Ac
% of Graded Slopes:	24%

Legend:

- TURF AREA
- HARDTOP, PARKING, & ROADS
- WALKS & COURTYARDS
- PLAY STRUCTURE
- WETLAND HABITAT

north
Scale: 1"=100'-0"

RRM DESIGN GROUP

EXHIBIT NO. 10
APPLICATION NO. SLO-CPH-2-01
Alternative Site
Design to avoid wetlands

Cambria Elementary Master Plan

Site Requirements for Elementary Grades -2000 Edition

	Required		Proposed Rhoades *	Alt. 2 Rhoades	Alt. 3 Rhoades	Existing School
Kindergarten						
Student Population: 60						
Turf Area	8000 sf	0.18 ac	0.10 ac	0.2 ac	0.1 ac	
Hardtop	6000 sf	0.13 ac	0.03 ac	0.1 ac	0.07 ac	
Play Structure	3000 sf	0.07 ac	0.02 ac	0.02 ac	0.02 ac	
Bldgs. & grounds	5200 sf	0.12 ac	0.12 ac	0.07 ac	0.07 ac	
		x 20%				
SubTotal		**0.6 ac**	**0.27 ac**	**0.4 ac**	**0.25 ac**	
Grades 1-5						
Student Population: 480						
Play Field	151,200 sf	3.55 ac	2.96 ac	2.6 ac	2.2 ac	
Hardtop	59,000 sf	1.35 ac	0.5 ac	0.5 ac	0.6 ac	
Play Structure	22,400 sf	0.52 ac	0.12 ac	0.07 ac	0.05 ac	
		x 10%				
Bldgs. & Grounds		3.8 ac	2.36 ac	1.8 ac	2.5 ac	
Parking & Roads		1 ac	3 ac	2.2 ac	2.2 ac	
SubTotal		**10.8 ac**	**8.94 ac**	**7.2 ac**	**7.5 ac**	**3.3 ac**
Total Useable Ac:		**11.4 ac**	**9.2 ac**	**7.6 ac**	**7.5 ac**	**3.3 ac**
% of required ac:			80%	66%	65%	29%
Gross Site Acreage:			14.6 ac	14.6 ac	19 ac	
Graded Slopes:			3.7 ac	3.3 ac	4.5 ac	
Site % of graded slopes:			25%	23%	24%	
Estimated Earthwork:			88,000 cy (balance)	280,000 cy cut/ 10,000 cy fill	163,268 cy cut/ 72,157 cy fill	

Rhoades Property are based on detailed Planning application. Acreages for Alternatives 2 & 3 are based on schematic/diagramatic plan.

EXHIBIT NO. 11
APPLICATION NO. SLO LCPA 2-01
Site Comparison #1

Cambria Elementary
Application and Rhoades Alternatives Site Comparison
Feb. 2002

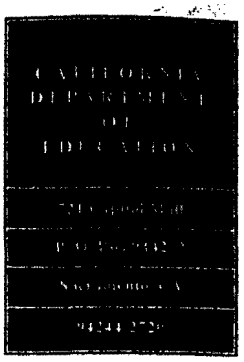
	Application - Rhoades site	Alternative 2 - Rhoades	Alternative 3 - Rhoades
Biological Resources			
Potential wetland impact onsite	0.23 acres (Seasonal low quality)	0.01 acres (seasonal low quality)	unknown
Rare/endangered species (Cambria Morning Glory)	no	no	unknown
Drainage/Grading			
Existing Drainage Channel removed	yes	no	no
Average Slope	15%	15%	15%
Grade difference from low to high point	80' elevation rise	100' elevation rise	100' elevation rise
Estimated Earthwork	88,000 cy cut/fill balance	280,000 cy cut/ 10,000 cy fill	163,268 cy cut/ 72,157 cy fill*
Estimated Number of trucks for soil import/ export	0	13,500 trucks export (20 cy per truck)	4,555 trucks export
Traffic/Access			
Onsite culvert required - Pedestrian crossing - Automobile crossing	no	yes $50, 000 for 40' $850,000 for 130'	no
Site Access points -Emergency access	2 1	2 1	1 0
Parking Spaces 175 spaces required for auditorium per County Ordinance.	173 spaces	130 spaces	98 spaces
Agricultural Resources			
Reduction of Grazing	acreage for 2 cow/calf	acreage for 2 cow/calf	acreage for 2 cow/calf
Impact to Adjacent Lands	0	0	0
Agricultural buffer	30-100' of slopes beyond parking and play areas	30-80' of slopes with the buffer only 30 ' next to habitable structures	60-80' of slopes beyond parking and play areas

EXHIBIT NO. 12, p
APPLICATION NO. SLO LCPA 2-01
Site Comparison
#2

	Rhoades	Alternative 2	Alternative 3
Visual Resources			
Visible from Highway 1 - northbound - southbound	 yes (at Main St. intersection) yes - significant	 yes (at Main St. intersection) yes - significant	 yes (at Main St. intersection) yes - partial
Public Services			
Urban Reserve Line Urban Services Line	Adjacent (outside) Adjacent (outside)	Adjacent (outside) Adjacent (outside)	Adjacent (outside) Adjacent (outside)
Educational Program			
State required /recommended area per 2000 Guide- 11.4 ac net			
Gross Site Acreage **Net usable acreage** Variance from School Site Requirements	14.6 ac **9.2 ac (80% of required)** 2.2 ac less	14.6 ac **7.6 ac (66% of required)** 3.8 ac less	19 ac **7.5 ac (65% of required)** 3.9 ac less
EIR Analysis			
Requires new analysis,Public comment period, and County hearings	No	No	Yes
Topographical Mapping			
Requires additional survey and mapping	No	No	Yes
Funding			
Meets School Bond $12.7 million budget	Yes	No	No

*The earthwork for this alternative was further reviewed and determined to potentially balance with a total quantity estimate of 100,000cy of earthwork. **However,** to accomplish this, the site was raised an average of 6' higher on the hill and a large fill slope 50-80' in height was created along Main street.

DELAINE EASTIN
State Superintendent of Public Instruction



November 13, 2001

Denis de Clerq, Director of Facilities
Coast Unified School District
2950 Santa Rosa Creek Road
Cambria, California 93428

Dear Mr. de Clerq:

We have reviewed the alternate site layout plans, Plan A and Plan B, which you recently sent to us for our comments. These are our initial observations:

Plan A

Supervision of the kindergarten playyard is difficult from the kindergarten classroom farthest from the playground. One could ameliorate this by moving both the Library and the Kindergarten Buildings 90 degrees counterclockwise; however, the path of travel from the kindergartens to the core facilities surrounding the Courtyard would be complicated.

Plan B

Student safety is the principle concern. The auto bridge across the ravine, which appears to be fifteen or more feet below the roadway, would require fencing which students could not scale and some kind of physical separation of pedestrian and auto traffic. The school bus drop off is on the opposite side of the bridge from the school buildings.

Similarly, the pedestrian bridge connecting the school buildings to the playfield would require secure fencing along its length. The ravine, itself, would require extensive fencing to prevent student incursions into its mysteries.

Traffic flow in the larger parking lot can be improved by widening the southeastern entrance for two-way bus traffic, reserving the southwestern entrance for staff use. Please see the attached sketch.

School buses would, apparently, be parked off campus.

Supervision of the kindergarten playyard is superior under this plan.

The Library, at 292 feet finished floor elevation, is located next to the hardtop play area of perhaps 298 feet finished elevation. On Plan A the hardtop is 298 feet; on Plan B it is not

marked. If this proximity is likely to translate into bothersome noise levels inside the Library people enter and leave, opening and closing the doors, or if the windows are open, then we recommend you consider switching locations with the classroom building next to it.

The Playfield is significantly smaller, about 75% the size of the Playfield in Plan A.

All in all, Plan A has the greater potential to be a safe, useable and manageable school campus plan and we recommend it.

Please keep us informed of the design development of Cambria Elementary School and let us know how we can be of service in the future.

Sincerely,

George M. Shaw, Field Representative
School Facilities Planning Division
805-692-9913

GMS

Attachment

CCC Exhibit 13
(page 2 **of** 4 **pages)**

DELAINE EASTIN
State Superintendent of Public Instruction

CALIFORNIA
DEPARTMENT
OF
EDUCATION
[illegible]
[illegible]
[illegible]
[illegible]

March 14, 2002

Denis de Clerq, Director of Facilities
Coast Unified School District
2950 Santa Rosa Creek Road
Cambria, California 93428

Dear Mr. de Clerq:

We have reviewed the third alternate site layout plan for the new Cambria Elementary School, located on the Rhoades property. The following are our observations:

This site layout produces only 7.5 net useable acres. This is 76% of the minimum useable acreage required for this student population. If this site plan is chosen, the School District will need to provide a written educational justification, pursuant to Title 5, Section 14010(b), showing how students will be provided an adequate education, including an adequate physical education, on the undersized site.

The hillside appears to be profoundly altered with the proposed grading and removal of several hundred thousand cubic yards of land. This grading plan may be censured by environmental groups.

The parent drop off is well located in front of the Courtyard, and the Administration and Kindergarten Buildings. You will need to ensure that enough curb space and visitor parking is available for parents of 40 kindergarten students to deliver or retrieve their children morning, noon, and afternoon.

Staff and Visitor Parking is insufficient for a school of 26 classrooms. Elementary schools typically need 2.25 parking spaces for each classroom to accommodate teachers, administrators, teachers aides, and visitors. You may wish to see a fuller discussion of parking issues in our *Guide to School Site Analysis and Development, 2000 Edition*, pages 13-14. The plan shows 45 parking spaces, where 59 are minimally required. If evening events are held in the multipurpose building to which the community is invited, this deficit in parking will be very unpopular, indeed.

School buses seem to have no on-campus parking.

Supervision of the kindergarten playyard from the kindergarten farthest from the playground is not going to be possible as currently shown on the plans. The Kindergarten Building could be rotated 90 degrees to alleviate the problem.

Supervision of the farthest classroom buildings from the Administration Building will be challenging because of the long, narrow campus configuration.

Supervision of the main playfield from the central campus will probably not be possible because of the 10-foot change in elevation.

The handicapped ramp shown on the plans leading from the central campus level to the large playfield and hardcourt areas is very long and might not meet with the approval of the Division of the State Architect.

We appreciate these alternative site plans, but the original plan, Plan A, is fundamentally sound and has the greatest potential to be a safe, useable, advantageous, and manageable school campus plan. We still recommend it. I understand that you are trying to mollify the Coastal Commission. However, I do not believe, based on discussions with our legal office, that the Coastal Act supersedes the state authority of public school districts. The School District and the community are very fortunate to have this site, and I would not like to see its value diminished by trying to satisfy every concern of every governmental agency. I do think that it is time for your board to get on with this project and provide the school that children in Cambria need and deserve.

Please do not hesitate to contact me if you would like to discuss this letter or any aspect of your school facilities needs.

Sincerely,

George M. Shaw, Field Representative
School Facilities Planning Division
805-692-9913
sfpdgshaw@aol.com

GMS

CCC Exhibit 13
(page 4 of 4 pages)

January 31, 2002

Mr. Denis de Clerq
Coast Unified School District
2850 Schoolhouse Lane
Cambria, CA 93428

Re: Request for Information from Coastal Commission Staff (Availability of Public Services)

Dear Mr. de Clerq,

This letter is provided to clarify the position of the Cambria Community Services District with regard to the delivery of water service to the proposed new Cambria Elementary School (Local Coastal Plan Amendment Submittal No. 2-01).

The declaration of a water emergency by the Cambria Community Services District is not anticipated to impact the ability of the District to serve the proposed elementary school. The Coast Unified School District has been coordinating its plans for the new school with the CCSD since the beginning of the project. Our analysis of the available water supply in preparing the water emergency declaration took into account the potential for the completion of the new school facility. With this in mind, the declaration adopted by the CCSD Board of Directors specifically exempts new school facilities from the resulting moratorium.

In addition, the CCSD is working aggressively to identify additional water sources through the development of a new water master plan. It is likely that this plan will be complete prior to the completion of the new school facility and therefore eliminate any concerns over the ability to serve the project. The water master plan is scheduled for completion by December 31,2002.

It is further anticipated that the CCSD, in cooperation with the School District and other community members, will develop a more effective water re-use program in the near future. This program will allow the use of treated wastewater for landscape and turf irrigation and similar applications. This usage will replace a significant amount of potable water that is currently diverted, thereby causing an increase in the potable water supply for all users.

EXHIBIT NO. 14, p.1
APPLICATION NO. SLO LCPA 2-01
CCSD Letter

Even though the completion of the water master plan and the development of an effective water re-use program are most likely to occur prior to the completion of the new elementary school, it is my belief that any demands placed on the water system by the new school will not be of sufficient volume to impact the delivery of water to other current customers.

I hope that this letter adequately addresses your concerns regarding the impact of the proposed new elementary school on the CCSD water distribution system. Please feel free to contact me if you have any questions or desire additional information.

Sincerely,

V. L. Hamilton
Interim General Manager

CCC Exhibit 14
(page 2 of 2 pages)