

CALIFORNIA COASTAL COMMISSION

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Staff: GC-SD
Staff Report: September 22, 2005
Hearing Date: October 12-14, 2005

REVISED CONDITIONS AND FINDINGS

Application No.: 6-05-40

Applicant: City of Solana Beach

Agent: Susan McCabe

Description: Demolition of 60 parking spaces within an existing 93-space public beach asphalt parking lot (Fletcher Cove Beach Park) and replacement with a grass and/or sand covered park and the request for after-the-fact approval of an unpermitted 74-space parking lot at 140 S. Sierra Avenue.

Site: 140 S. Sierra Avenue and Fletcher Cove Beach Park, west end of Plaza St., Solana Beach. APN Nos. 298-010-63 and 66

Substantive File Documents: San Diego County Local Coastal Plan, San Dieguito Land Use Plan (1980); Fletcher Cove Master Plan/June 1992; Fletcher Cove Master Plan/June 2001; City of Solana Beach Resolution No. 95-43; City of Solana Beach Resolution No. 2001-59; Grading, Paving and Striping Plans for 140 S. Sierra Avenue dated 5/26/95; "Fletcher Cove Parking Study" by Katz, Okitsu & Associates dated April 12, 2005.

STAFF NOTES:

Staff recommends the Commission adopt the following revised findings in support of the Commission's action on June 8, 2005. In its action, the Commission approved the demolition of 60 parking spaces within Fletcher Cove Park and its replacement with a grass or sand park area and the development of a 74 space parking lot across the street from Fletcher Cove Park at 140 S. Sierra Avenue.

Date of Commission Action: June 8, 2005

Standard of Review: The City of Solana Beach does not have a certified LCP. Therefore, the standard of review is Chapter 3 policies of the Coastal Act.

Commissioners on Prevailing Side: Burke, Iseman, Kram, Kruer, Neely, Peters, Potter, Reilly, Secord, Shallenberger, Wan and Chairman Caldwell.

I. MOTION: *I move that the Commission adopt the revised findings in support of the Commission's action on June 8, 2005 concerning approval of Coastal Development Permit No. 6-05-40*

STAFF RECOMMENDATION OF APPROVAL:

Staff recommends a YES vote on the motion. Passage of this motion will result in the adoption of revised findings as set forth in this staff report. The motion requires a majority vote of the members from the prevailing side present at the June 8, 2005 hearing, with at least three of the prevailing members voting. Only those Commissioners on the prevailing side of the Commission's action are eligible to vote on the revised findings.

RESOLUTION TO ADOPT REVISED FINDINGS:

The Commission hereby adopts the findings set forth below for *Coastal Development Permit No. 6-05-40* on the ground that the findings support the Commission's decision made on June 8, 2005 and accurately reflect the reasons for it.

Summary of Staff's Preliminary Recommendation: ~~Staff recommends that the Commission take one vote adopting a two-part resolution, which would approve portions of the development and deny other portions of the development. Staff recommends the Commission **approve** the applicant's request for after the fact approval of an unpermitted 74-space parking lot at the "Distillery lot" (140 S. Sierra Avenue). The 74-space parking lot will help improve public access to the shoreline by providing adjacent commercial businesses adequate parking for their patrons such that they will be less likely to use public parking spaces on the streets or at Fletcher Cove that otherwise could be used by beachgoers.~~

~~Staff, recommends that the Commission **deny** the applicant's request for construction of a grass and/or sand park area within Fletcher Cove Beach Park because it will result in the permanent loss of 60 out of the existing 93 beach parking spaces at the only beachfront parking lot in Solana Beach. While the applicant has proposed to offset the loss of the 60 parking spaces with the nearby previously constructed 74-space Distillery lot, and, in fact, that is the reason the off-site lot was acquired by the City, it cannot be given equal weight or one-for-one replacement value. In addition, heavy use of the Distillery lot suggests there is current demand for parking in this lot by patrons of the nearby businesses such that very few spaces would remain available in that lot for Fletcher Cove Beach Park users during those times. The loss of 60 parking spaces from this public beachfront parking lot is considered a significant impact on public access, inconsistent with Coastal Act policies. Staff believes elimination of valuable beach parking in a prime location without a thorough analysis of the total parking demand, particularly during the summer, in this critical beach access location is at best, premature.~~

I. PRELIMINARY STAFF RECOMMENDATION:

The staff recommends that the Commission adopt the following two-part resolution. The motion passes only by an affirmative vote of a majority of the Commissioners present.

MOTION: *I move that the Commission adopt the staff recommendation to approve in part and deny in part Coastal Development Permit No. 6-05-40, with the approval subject to the conditions recommended by staff, by adopting the two-part resolution set forth in the staff report.*

RESOLUTION:**Part 1: Approval with Conditions of a Portion of the Development**

The Commission hereby **GRANTS, as conditioned**, a coastal development permit for the portion of the project consisting of the request for after-the-fact approval of a 74 space parking lot at 140 S. Sierra Avenue, Solana Beach and adopts the findings set forth below on grounds that the development as conditioned will be in conformity with the policies of Chapter 3 of the Coastal Act, will not prejudice the ability of the local government having jurisdiction over the area to prepare a Local Coastal Program conforming to the provisions of Chapter 3, and will not have any significant adverse effects on the environment within the meaning of the California Environmental Quality Act.

Part 2: Denial of the Remainder of the Development

The Commission hereby **DENIES** a coastal development permit for the portion of the development consisting of the demolition of 60 parking spaces within an existing 93 space public beach asphalt parking lot within Fletcher Cove Beach Park and adopts the findings set forth below, on the grounds that the development will not be in conformity with the provisions of Chapter 3 of the California Coastal Act of 1976, would prejudice the ability of the local government having jurisdiction of the area to prepare a Local Coastal Program conforming to the provisions of Chapter 3 of the Coastal Act, and would result in significant adverse effects on the environment within the meaning of the California Environmental Quality Act.

II. Standard Conditions.

1. Notice of Receipt and Acknowledgment. The permit is not valid and development shall not commence until a copy of the permit, signed by the permittee or authorized

agent, acknowledging receipt of the permit and acceptance of the terms and conditions, is returned to the Commission office.

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

III. Special Conditions.

The permit is subject to the following conditions:

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

- (a) Selected BMPs (or suites of BMPs) shall be designed to treat, infiltrate or filter the amount of stormwater produced on site by each runoff event, up to and including the 85th percentile, 24-hour runoff event for volume-based BMPs, and/or the 85th percentile, 1-hour runoff event, with an appropriate safety factor, for flow-based BMPs.
- (b) Runoff shall be conveyed off site in a non-erosive manner.
- (c) Drainage from the parking areas, driveway area, and other impervious surfaces on the site shall be directed through vegetative or other media filter devices effective at removing and/or mitigating contaminants such as petroleum hydrocarbons, heavy metals, and other particulates.

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

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

2. Condition Compliance. **WITHIN 60 DAYS OF COMMISSION ACTION ON THIS CDP APPLICATION**, or within such additional time as the Executive Director may grant for good cause, the applicant shall satisfy all requirements specified in the conditions hereto that the applicant is required to satisfy prior to issuance of this permit. Failure to comply with this requirement may result in the institution of enforcement action under the provisions of Chapter 9 of the Coastal Act.

3. Implementation of Drainage and Polluted Runoff BMPs. **WITHIN 90 DAYS OF ISSUANCE OF THIS PERMIT**, or within such additional time as the Executive Director may grant for good cause, the applicant shall install/implement drainage and polluted runoff control BMPs consistent with the plans approved pursuant to Special Condition #1 of this permit. Failure to comply with this requirement may result in the institution of enforcement action under the provisions of Chapter 9 of the Coastal Act.

4. Final Revised Plans. PRIOR TO THE ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicants shall submit to the Executive Director for review and written approval, final site, grading, and building plans for the permitted Fletcher Cove Beach Park development. Said plans shall be in substantial conformance with the site plan shown on Exhibit #3 of the staff report.

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

5. Final Landscape Plans. PRIOR TO THE ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicant shall submit for the review and written approval of the Executive Director, a final landscaping plan for the Fletcher Cove Beach Park development that incorporates the following:

- a. A plan showing the type, size, extent and location of all plant materials on the site.
- b. All new plant material shall consist of drought tolerant native, non-invasive plant materials. New trees shall be prohibited in areas that affect public views of the ocean.
- c. No new permanent irrigation system shall be installed.
- d. The use of rodenticides is prohibited.
- e. A written commitment by the applicant that all required plantings shall be maintained in good growing conditions, and whenever necessary, shall be replaced with new plant materials to ensure continued compliance with applicable landscape requirements.

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

6. Public Access Corridors. PRIOR TO THE ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicant shall submit to the Executive Director for review and written approval, final plans for the Fletcher Cove Beach Park development indicating the location of access corridors to the construction site and staging areas. The final plans shall indicate that:

- a. No overnight storage of equipment or materials shall occur on sandy beach or on the remaining public parking spaces within Fletcher Cove Park.
- b. The Fletcher Cove Park access ramp and proposed remaining public parking spaces within Fletcher Cove shall remain open and available to public use during construction.
- c. No work shall occur during the summer months between Memorial Day weekend and Labor Day of any year.
- d. The applicant shall submit evidence that the approved plans/notes have been incorporated into construction bid documents. The staging site shall be removed and/or restored immediately following completion of the development.

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

7. Storage of Construction Materials, Mechanized Equipment, and Removal of Construction Debris. PRIOR TO THE COMMENCEMENT OF CONSTRUCTION, the applicant shall submit for the review and approval of the Executive Director, a Construction Best Management Practices Plan for the Fletcher Cove Beach Park construction project site, prepared by a licensed professional, and shall incorporate erosion, sediment, and chemical control Best Management Practices (BMPs) designed to minimize to the maximum extent feasible the adverse impacts associated with construction to receiving waters. In addition to the specifications above, the plan shall be in substantial conformance with the following requirements:

- (a) No construction materials, equipment, debris, oil, liquid chemicals, or waste shall be placed or stored where it may be subject to stormwater, or where it may contribute to or come into contact with nuisance flow;
- (b) Any and all debris resulting from construction activities shall be removed from the site within 1 day of completion of construction;
- (c) Sand from the beach, cobbles, or shoreline rocks shall not be used for construction material;
- (e) All stock piles and construction materials shall be covered, enclosed on all sides, and shall be located as far away as possible from drain inlets and any waterway,
- (f) All debris and trash shall be deposited of in the proper trash and recycling receptacles at the end of each construction day;

- (g) The discharge of any hazardous materials into any receiving waters shall be prohibited.
- (h) Construction equipment shall not be washed on the beach or within the Fletcher Cove parking lot.
- (i) The applicant shall submit evidence that the approved plans/notes have been incorporated into construction bid documents.

The permittee shall undertake development in accordance with the approved final plan and schedule and other requirements. Any proposed changes to the approved final plan shall be reported to the Executive Director. No changes to the approved final plan shall occur without a Commission amendment to this coastal development permit unless the Executive Director determines that no amendment is legally required.

8. Public Parking Sign Program. PRIOR TO THE ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicant shall submit to the Executive Director for review and written approval, a public parking sign program for the parking lots at both Fletcher Cove and the Distillery Lot. The plan shall include the following:

- a. Signage at the Fletcher Cove lot shall direct the public to additional public parking at the Distillery Lot.
- b. Signage at the Distillery Lot shall clearly indicate the availability of the 74 spaces available at all times for beach parking as well as times at which the remaining 50 spaces are available for beach parking.

9. Parking Demand Monitoring Program. The applicant shall conduct a parking demand study during the summer from Memorial Day through Labor Day of the Fletcher Cove, the Distillery Lot and adjacent public streets each year for a period of two years following elimination of the 60 parking spaces at Fletcher Cove. This information shall be considered in the Commission's decision on future amendments to this permit or in future permit requests for development at Fletcher Cove or the nearby properties. In addition, the parking demand study shall include an analysis and evaluation of the use of a public shuttle system along the Highway 101 Corridor and the Solana Beach Transit Center to Fletcher Cove.

10. Distillery Lot Use Restriction. A minimum of seventy-four (74) unrestricted public parking spaces shall be available in perpetuity at the "Distillery Lot". These spaces cannot be leased or made available for exclusive use by private entities at any time.

11. Deed Restriction. PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicant shall submit to the Executive Director for review and approval documentation demonstrating that the applicant has executed and

recorded against the "Distillery Lot" parcel governed by this permit a deed restriction, in a form and content acceptable to the Executive Director: (1) indicating that, pursuant to this permit, the California Coastal Commission has authorized development on the subject property, subject to terms and conditions that restrict the use and enjoyment of that property; and (2) imposing the Special Conditions of this permit as covenants, conditions and restrictions on the use and enjoyment of the Property. The deed restriction shall include a legal description of the entire "Distillery Lot" parcel governed by this permit. The deed restriction shall also indicate that, in the event of an extinguishment or termination of the deed restriction for any reason, the terms and conditions of this permit shall continue to restrict the use and enjoyment of the subject property so long as either this permit or the development it authorizes, or any part, modification, or amendment thereof, remains in existence on or with respect to the subject property.

IV. Findings and Declarations.

The Commission finds and declares as follows:

1. Project Description\History. The subject application involves two separate developments in the City of Solana Beach. The first development involves a request for after-the-fact approval of an unpermitted 74-space asphalt parking lot at 140 S. Sierra Avenue, Solana Beach. The lot had previously been occupied by the "Distillery" nightclub which became damaged by fire and was subsequently demolished pursuant to a City nuisance abatement order. In 1994, the City acquired the lot which by then contained the "Distillery's" 50-space parking area and unimproved area where the "Distillery" once stood. After acquiring the property in 1994, the City improved the unimproved area to create an additional 74-space parking lot without benefit of a coastal development permit. As a result, today there are a total of 124 parking spaces on the subject lot. However, the subject application only involves a request for after-the-fact approval of the 74-space asphalt parking area since the 50-space lot was in place at the time of the Distillery nightclub operation.

The applicant has identified that the reason the City purchased the subject lot in 1994 was in order to relocate the surface parking lot that exists at nearby Fletcher Cove Beach Park. The City has long-range plans to redevelop Fletcher Cove Beach Park. In 2001, the City approved the Fletcher Cove Master Plan which included a proposal to remove up to 75 parking spaces from Fletcher Cove and relocate them to the "Distillery" site. However, the Fletcher Cove Master Plan has not been reviewed or approved by the Commission and the standard of review for the subject development is the Coastal Act.

The second development request involves the redevelopment of nearby Fletcher Cove Beach Park and construction of a grass and/or beach sand park area in place of a portion of the existing 93-space asphalt parking lot. The proposed redevelopment of Fletcher Cove Beach Park will result in the loss of 60 public parking spaces. The applicant is proposing to mitigate the loss of these 60 parking spaces by replacing the parking with

the parking in the previously constructed 74-space parking lot (that is proposed for after-the-fact approval with this application) at 140 S. Sierra Avenue.

The existing unpermitted 74-space parking lot is at 140 S. Sierra Avenue, which is on the east side of S. Sierra Avenue behind several commercial buildings that front Highway 101 and Plaza Street. Fletcher Cove Beach Park is located on the west side of S. Sierra Avenue, at the western terminus of Plaza Street. Fletcher Cove Beach Park is approximately 250 to 300 ft. northwest of the proposed 74-space parking lot.

The City of Solana Beach does not have a certified Local Coastal Program (LCP). As such, the standard of review for the proposed development is Chapter 3 policies of the Coastal act.

V. APPROVAL FINDINGS AND DECLARATIONS (Distillery Lot)

The findings in this section apply only to that portion of the development ~~that is described in Part 1 of the Commission's resolution on this permit application, which portion is therefore being conditionally approved~~ involving the after-the-fact request of an unpermitted 74-space parking lot at 140 S. Sierra Avenue.

1. Public Access/Parking. Section 30252 of the Coastal Act states, in part, that:

The location and amount of new development should maintain and enhance public access to the coast by (1) facilitating the provision or extension of transit service, (2) providing commercial facilities within or adjoining residential development or in other areas that will minimize the use of coastal access roads, (3) providing non-automobile circulation within the development, (4) providing adequate parking facilities or providing substitute means of serving the development with public transportation

This proposal involves a request for after-the-fact approval of an existing unpermitted 74-spaced asphalt parking area adjacent to and connected with an existing 50-spaced asphalt parking area. The subject site is located on the east side of S. Sierra Avenue, approximately 250 to 300 feet southeast of Fletcher Cove Beach Park, the City's primary beach access area. The subject development is located adjacent to several commercial developments that front Highway 101 to the east and Plaza Street to the north. Many of the existing commercial developments that surround the proposed parking lot were constructed prior to the incorporation of the City of Solana Beach and fail to meet the City's current parking standards. As a result, the subject parking lot is heavily used during the workweek by patrons of the surrounding businesses.

Section 30252 of the Coastal Act requires that new development should maintain and enhance public access to the coast by, among other things, providing adequate parking facilities. The applicant proposes to use this parking lot for the replacement of the 60 parking spaces proposed to be eliminated at nearby Fletcher Cove Beach Park. However, as explained in Section VI of this report, the Commission cannot approve the proposed

elimination of parking at Fletcher Cove. Although it cannot be considered for replacement parking for lost parking at Fletcher Cove, the existing unpermitted 74 space public parking lot can and does provide a reservoir of parking spaces for surrounding businesses and will help protect existing beach parking that currently exists at Fletcher Cove and along S. Sierra Avenue because business patrons will more likely use the proposed 74 spaces adjacent to the commercial establishment than the beach parking areas. In addition, on summer weekends when beach use is highest, these spaces can also serve to supplement existing parking at Fletcher Cove and along S. Sierra Avenue. To assure that the public is fully aware these spaces can be used for beach parking, Special Condition #8 has been attached which requires the Distillery lot to have adequate signage identifying these 74 spaces are available at all times to the general public and clearly identifies the hours of availability all other spaces on the lot. To assure these 74 spaces remain available to the general public, Special Condition #10 requires these spaces remain public in perpetuity. To assure all future owners of the property are aware of these conditions, Special Condition #11 requires a deed restriction be placed on the property identifying the terms and conditions of the subject permit. Therefore, as conditioned, the after-the-fact approval of the unpermitted 74-space parking lot is consistent with the public access policies of the Coastal Act.

2. Runoff/Water Quality. Section 30231 of the Coastal Act requires that the biological productivity of coastal waters be maintained by, among other means, controlling runoff and states, in part, that:

Section 30231

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 entrapment, controlling runoff,

The construction of impervious surfaces can result in impacts to water quality because water runoff from hard surfaces can contain pollutants that eventually drain onto beaches or other coastal waters. In urban areas, runoff can contain oil, gasoline, brake dust, particles of roofing material and construction matter, chemicals, trash and other contaminants. Filters, catch basins, permeable paving surfaces such as modular pavers, grassed parking areas, and permeable pavements can be employed to trap vehicle-generated pollutants and reduce runoff volumes.

The proposed project will increase the impervious surface area and the number of parking spaces on the site, which could potentially increase the pollutants on the site associated with cars. In addition, as the project site is located within approximately 1,000 feet of the ocean, it has the potential to adversely affect ocean waters unless measures are taken to contain or filter runoff from the subject site. The applicant has not provided plans or other documentation detailing how runoff from the subject site will be contained and filtered. Therefore, Special Condition #1 has been attached which requires the applicant to submit a Drainage and Polluted Runoff Control Plan the incorporates structural and

nonstructural Best Management Practices (BMPs), for Executive Director approval, involving the proposed parking lot improvements. With appropriate BMPs, the potential for polluted runoff from the site making its way to the ocean is reduced. Therefore, as conditioned, the Commission finds the proposed development consistent with the water quality protection policies of the Coastal Act.

3. Unpermitted Development. Unpermitted development has occurred on the subject site without the required coastal development permit in the form of a 74-space asphalt parking lot for which the applicant is requesting after-the-fact approval. To ensure that the unpermitted development addressed by this application is resolved in a timely manner, Special Condition #2 requires that the applicant satisfy all conditions of this permit that are prerequisite to the issuance of this permit within 60 days of Commission action, or within such additional time as the Executive Director may grant for good cause. In addition, Special condition #3 requires that all runoff control measures and best management practices (BMPs) required pursuant to Special Condition #1 of this permit be installed and implemented within 90 days of issuance of the coastal development permit.

Although construction has taken place prior to submission of this permit application, consideration of this application by the Commission has been based solely upon the Chapter 3 policies of the Coastal Act. Review of this permit does not constitute a waiver of any legal action with regard to the alleged violation nor does it constitute an admission as to the legality of any development undertaken on the subject site without a coastal permit.

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

Based on the above discussion, the proposed request, as conditioned, for after-the-fact approval of the 74-spaced asphalt parking lot has been found to be consistent with the water quality and public access/recreation policies of the Coastal Act. Use of these spaces will maintain and/or enhance public access to the coast. The Commission finds that approval of the proposed project, as conditioned, will not prejudice the ability of the City of Solana Beach to prepare a Local Coastal Program that is in conformity with Chapter 3 policies.

5. Consistency with the California Environmental Quality Act (CEQA). Section 13096 of the Commission's Code of Regulations requires Commission approval of Coastal Development Permits to be supported by a finding showing the permit, as conditioned, to be consistent with any applicable requirements of the California Environmental Quality Act (CEQA). Section 21080.5(d)(2)(A) of CEQA prohibits a proposed development from being approved if there are feasible alternatives or feasible

mitigation measures available which would substantially lessen any significant adverse effect which the activity may have on the environment.

The proposed project has been conditioned in order to be found consistent with the water quality protection policies of the Coastal Act. Mitigation measures, including a Best Management Program addressing polluted runoff and involving regular maintenance, public access signage, parking monitoring and a prohibition against exclusive use of the parking spaces will minimize all adverse environmental impacts. As conditioned, there are no feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse impact which the activity may have on the environment. Therefore, the Commission finds that the proposed project is the least environmentally-damaging feasible alternative and is consistent with the requirements of the Coastal Act to conform to CEQA.

Recommendation Summary.

In summary, after-the-fact approval of the unpermitted 74-space asphalt parking lot, as conditioned, will serve to maintain and/or enhance public access to the coast by providing additional parking for the general public including beachgoers. ~~business users that otherwise might use the street parking closer to the beach or the beach parking spaces at Fletcher Cove. In addition, while not generally available during the workweek (due to its use by customers/employees of the nearby businesses), the proposed parking lot will be available to beachgoers after 6:00 p.m. during the workweek and at additional times during the weekend.~~ Therefore, the subject development may also serve as a parking reservoir during high beach use such as summer weekends. Therefore, as conditioned, the proposed development is consistent with Section 30252 and 30231 of the Coastal Act.

VI. DENIAL-APPROVAL FINDINGS AND DECLARATIONS (Fletcher Cove Park)

The findings in this section apply only to that portion of the proposed development ~~that is described in Part 2 of the Commission's resolution on this permit application, which portion is therefore being denied involving the demolition of 60 parking spaces within the existing 93-space public beach parking lot at Fletcher Cove Beach Park and replacement with a grass and/or sand covered park.~~

1. Public Access and Recreation, Visual Resources, Geologic Stability, and Water Quality. Several policies of the Coastal Act require that new development protect or enhance public access and recreational opportunities to and along the shoreline, enhance and protect existing views and not result in adverse geologic impacts or adversely affect the quality of ocean waters. These policies include:

Section 30210

In carrying out the requirements of Section 4 of Article X of the California Constitution, maximum access, which shall be conspicuously posted, and

recreational opportunities shall be provided for all the people consistent with public safety needs and the need to protect public rights, rights of private property owners, and natural resource areas from overuse.

Section 30211

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

Section 30212

(a) Public access from the nearest public roadway to the shoreline and along the coast shall be provided in new development projects except where:

(1) it is inconsistent with public safety, military security needs, or the protection of fragile coastal resources,

(2) adequate access exists nearby, or,

Section 30212.5

Wherever appropriate and feasible, public facilities, including parking areas or facilities, shall be distributed throughout an area so as to mitigate against the impacts, social and otherwise, of overcrowding or overuse by the public of any single area.

Section 30213

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

Section 30221

Oceanfront land suitable for recreational use shall be protected for recreational use and development unless present and foreseeable future demand for public or commercial recreational activities that could be accommodated on the property is already adequately provided for in the area.

Section 30223

Upland areas necessary to support coastal recreational uses shall be reserved for such uses, where feasible.

Section 30231

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 entrapment, controlling runoff,

Section 30251.

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. . .

Section 30252

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

Section 30253 of the Coastal Act states, in part:

New development shall:

(1) Minimize risks to life and property in areas of high geologic, flood, and fire hazard.

(2) Assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs...

The proposed development involves the elimination of 60 parking spaces within a 93 space public parking lot and the installation of a turf grass and/or beach sand passive recreation area in place of the 60 parking spaces at a beachfront park (Fletcher Cove Beach Park). Fletcher Cove Beach Park comprises approximately 5.6 acres of land that includes a sandy beach area along the shoreline and a developed blufftop recreation area

consisting of a small grassy area with picnic tables, an approximately 378 sq. ft. restroom, 43,800 sq. ft. asphalt parking lot accommodating 93 spaces, approximately 3,570 sq. ft. Marine Safety Center, a 1,700 sq. ft. Community Center, and a ½ court basketball facility. Access to the sandy beach area is accommodated by an approximately 10 to 15 ft. wide concrete access ramp on the north side of the Fletcher Cove parking lot that slopes downward to the beach from the park's entrance.

The 1,700 sq. ft. community center is located on the north side of the access ramp on a blufftop area that is approximately 40 feet higher in elevation than the other park facilities and will remain. In December 2002, the Commission approved the demolition of the existing restroom and the construction of a new restroom facility north of the access ramp (CDP No. 6-02-50/City of Solana Beach). The demolished restroom area is within the existing park area and is proposed to be converted to an additional landscaped, passive recreation area upon completion of the new restroom. The only existing facility affected by the subject development is the parking area where 60 parking spaces are proposed to be removed. Therefore, the proposal involves adding additional recreational area while at the same time eliminating a substantial amount of public beach parking.

As previously stated, the site on which the proposed turf grass and/or beach sand recreation area is to be installed is currently used for public beach parking. The project will result in the removal of 60 of the 93 public parking spaces, leaving 33 parking spaces to serve the existing passive park area, basketball court, Marine Safety Center, community center and the new passive recreation area. The applicant contends that the loss of the 60 public parking spaces can be mitigated by replacing them in a parking lot located approximately 250 to 300 ft. southeast of the park at 140 S. Sierra Avenue. ~~However, the Commission finds the proposed replacement parking cannot be given equal or one-for-one replacement value. In addition, there is current demand (non-beach related) for the proposed replacement parking facility that can't be disregarded.~~

The subject development is located at Fletcher Cove Beach Park, a 5.6 acre park that serves as the primary beach access location in the City of Solana Beach. With parking space for up to 93 vehicles and direct access from Interstate 5 via Lomas Santa Fe drive, Fletcher Cove Beach Park provides close and immediate access for beachgoers unlike any other access location in the City. The public access ramp at Fletcher Cove accommodates direct access to the shoreline for pedestrians and lifeguard vehicles. In addition, as with all of California beaches, Fletcher Cove Beach Park is a coastal resource of statewide importance. The park is used by local and regional residents as well as tourists for a wide variety of passive and active ocean/shoreline recreation activities including surfing, swimming, tide pooling, jogging and ocean viewing. As can be seen on the attached Exhibit #4, public access to the beach is also accommodated by three public access stairways located at Tide Beach Park, "Seascape Surf" and "Del Mar Shores Terrace". These public access stairs, however, require climbing down approximately 80 ft. of stairs and are located in residential neighborhoods which do not provide the level of parking found at Fletcher Cove. The stairways at "Seascape Surf" and "Del Mar Shores Terrace" (condominiums) also require meandering several hundred

feet through blufftop condominium complexes and are, therefore, not as inviting as Fletcher Cove Park.

The City has long-range plans to redevelop Fletcher Cove and has held numerous public workshops and hearings over the last decade to assist in its design. In June of 2001, the City Council approved the Fletcher Cove Master Plan which envisions, among other things, a new Marine Safety Center; a playground/tot lot; new public restrooms and showers; vehicular circulation changes including closing Pacific St./N. Sierra Avenue at the intersection with Plaza and closure of Plaza Street and; relocation of up to 74 parking spaces to the "Distillery" lot at 140 S. Sierra Avenue. The overall goal is to make the park more pedestrian oriented and to increase passive recreational use of the park's upland area. Therefore, the subject development proposal is a significant element of the Fletcher Cove Master Plan. However, while the Fletcher Cove Master Plan has been approved by the City, it has not been reviewed or approved by the Coastal Commission. Therefore, while elimination of parking at Fletcher Cove is part of the City's Fletcher Cove Master Plan, the standard of review for the subject proposal is the Coastal Act.

The applicant has identified that the property at 140 S. Sierra Avenue (the "Distillery" site) was purchased by the City in 1994 for the sole purpose of relocating all of the surface parking from Fletcher Cove following implementation of the Fletcher Cove Master Plan. The City's 1992 resolution approving the original Fletcher Cove Master Plan and the elimination of surface parking at Fletcher Cove indicated that "[a]t least 290 off-street parking spaces will be provided to accommodate the proposed uses and replace parking spaces lost to project development." (Ref. City of Solana Beach Resolution No. 92-59). The "off-street parking spaces" involved a parking structure that was to have been constructed at the "Distillery" site. The City authorized the "Distillery" lot to be used as an "interim" surface public parking lot. The following is from the City's Resolution approving the use permit for the parking lot construction at 140 S. Sierra Avenue:

WHEREAS, the Fletcher Cove Master Plan specifically identifies this property as the receiver site for the existing parking spaces at Fletcher Cove that will ultimately be relocated to 140 S. Sierra Avenue, and . . .

WHEREAS, the unimproved lot is presently being used for parking in a haphazard and unorganized manner, and the City desires to make this property available for additional safe parking until final improvements can be funded rather than fencing the property and not allowing its interim use, and

WHEREAS, proposed parking lot is an intermediate use and design until the planned parking structure can be funded and developed, . . .
(Ref. City of Solana Beach Resolution No. 95-43)

Subsequently, however, the Fletcher Cove Master Plan was revised (June 2001) and the planned parking structure at the "Distillery" site was eliminated. However, the current

Master Plan continues to identify the "Distillery" site as the repository for beach parking that will be eliminated at Fletcher Cove.

Most of the surface parking at Fletcher Cove would be relocated to the old "Distillery" parking lot, including the relocation of approximately 75 spaces to the Distillery site surface lot. With the relocation of 75 spaces to the "Distillery" site and retention of approximately 16 onsite spaces at the Cove, the beach park would have a total of 93 spaces (the same as the existing count). (Ref. Approved Fletcher Cove Master Plan Mitigated Negative Declaration, June 19, 2001; Resolution No. 2001-59:

The subject request to convert 60 paved public parking spaces to passive recreational use (grass turf and/or beach sand) and to provide replacement parking for the eliminated parking spaces at a site 250 to 300 ft. southeast of the park raises consistency issues with the public access and recreation policies of the Coastal Act. First, the creation of a passive recreation area adjacent to the public beach is a highly desirable use, which is consistent with the Coastal Act policies that protect and encourage oceanfront and upland recreational areas (ref. Sections 30221 and 30222). In addition, by providing additional recreational amenities, public use of the area will likely increase over what exists today. The beach at this location is not accessible at all times because of high tides and the lack of sufficient sand. With an additional passive recreation area, enhanced park use will be possible even when access to the beach is not as desirable.

The City indicates that use of the parking spaces at Fletcher Cove is highly dependent on the tide levels, surf conditions, time of year, and availability of sand and weather conditions. Heaviest use is on weekends during the summer. When surf is up, use increases throughout the year in the early morning hours before work and later in the afternoons. There also appears to be increased use after school hours throughout the year. However, when there is no surf and weather is poor, the parking lot is generally empty. In addition, because of the current low levels of sand throughout Solana Beach's shoreline, access to the beach is dependent on tide levels. When tide levels are high, the parking lot is also generally empty since access to the beach is limited; except of course, when surf conditions are favorable for surfing.

Commission staff has visited Fletcher Cove over the years and concur with the City's assessment. However, while it is evident that many times over the span of a year, the parking lot at Fletcher Cove has been generally empty, the Commission is concerned that by reducing parking at Fletcher Cove from 93 spaces to 33, the public's ability to access the beach during high use periods will be adversely affected. In addition, while the beach is not accessible during many times of the year because of low sand levels, it is possible that sand levels could change overtime, either naturally or through sand replenishment projects, such that beach use would substantially increase. In June of 2001, approximately 146,000 cu. yds. of sand was placed at Fletcher Cove as part of the San Diego Association of Government's (SANDAG) Regional Beach Sand Replenishment Project, which placed sand on 12 receiver beaches throughout San Diego County (Ref. CDP 6-00-36/SANDAG). SANDAG is currently investigating funding sources for future

sand replenishment projects in San Diego County and Fletcher Cove is expected to once again be a candidate as a receiver beach.

Fletcher Cove Beach Park represents a valuable coastal resource of statewide and regional importance. Increasing populations along the Southern California coastline will undoubtedly result in increased use of this beach park. The large number of public parking spaces in close proximity of the ocean is a public access resource that should not be eliminated or substantially reduced without careful evaluation of its potential effect on public access over the long term. Furthermore, the City, as the applicant, has the burden of demonstrating that the project will be consistent with the access protection policies of the Coastal Act.

Two significant concerns are raised by the subject request. First, will the remaining 33 onsite parking spaces be sufficient to accommodate existing and future beach and park use including the added use resulting from the new passive recreational area? Secondly, can the loss of 60 prime beach parking spaces be adequately mitigated by providing replacement parking approximately 250 to 300 ft. southeast of Fletcher Cove?

To address these concerns, the City has submitted a parking study that identifies current parking demand at and around Fletcher Cove during four days in the winter of 2005 (February 24, 26, 27 and March 1, 2005). Using an "adjustment factor" the study attempts to estimate what the summer demand for parking might be. The parking study concludes that following the removal of 62 spaces from the Fletcher Cove public parking lot, sufficient available parking spaces will remain on nearby streets and at the Distillery lot to meet peak demand for parking even during the summer months. The report concludes:

"The data collected in this analysis shows that peak parking demand in the vicinity of Fletcher Cove is well below the practical parking capacity in the area.... Therefore, it is concluded that the removal of additional spaces, for a total of 62 fewer spaces in the Fletcher Cove vicinity, would not decrease the parking supply enough to cause capacity problems in the area."

Thus, the report concludes there is minimal demand for parking currently and ample room on surrounding streets and off-site lots to accommodate the proposed loss of parking in the Fletcher Cove parking lot. While the applicant's parking study indicates that adequate parking exists in the surrounding area to support the loss of 60 parking spaces at Fletcher Cove, the Commission is concerned that conditions might change over time such that future development proposals at or near Fletcher Cove Park might require an increase of public parking spaces to accommodate beach and park use. Therefore, Special Condition #9 has been attached which requires the applicant to perform a detailed parking demand study during the summer months at Fletcher Cove Park, the Distillery lot and surrounding streets for a period of two years following elimination of the 60 parking spaces at Fletcher Cove. This information will be used for any future coastal permit or amendment request pertaining to Fletcher Cove or the nearby area to assure impacts of

those developments do not adversely affect public parking that could be used for beach parking.

However, the Commission, after review of the applicant's parking study (ref. attached Exhibit #7) concludes that the report does not satisfactorily address the concerns identified above. The primary deficiencies in the parking study are that it does not include parking demand surveys conducted during the summer months and does not account for future local and regional growth or increased use of the park generated by the subject proposal to create a grassy/sandy park area.

The City's parking study identifies parking demand at Fletcher Cove, the Distillery lot and four streets in close proximity to Fletcher Cove on February 24, 26, 27 and March 1 of 2005 from 7:00 a.m. to 6:00 p.m. While the study identifies these were not rainy days, a review of weather reports for that period indicates heavy rains occurred two days before the first survey occurred and the ocean was "muddy" with runoff. According to the North County Times, a paper that serves Solana Beach:

Angry brown water churned down every river and stream in North County on Wednesday, after the latest storm in the area's third wettest winter on record. A muddy, foam spread far out in the ocean, fed by waterways fuller than they've been in many years.

The average annual rainfall for the county's coastal cities is about 10 inches. Many areas of North County added more than 2 inches to their totals in the past two days. (North County Times, February 23, 2005)

The first parking survey occurred on the day following this North County Times article. Since the public is routinely warned to avoid the ocean for at least 72 hours following such rains, it is unlikely the days following this intense winter storm would be the best time to perform a beachfront parking demand study. In addition, even under ideal weather and other circumstances, beach use parking demand during the winter months should not be used to represent beach parking demand during the summer.

Without an adequate demonstration of existing (actual) demand, it is not possible to evaluate the potential adverse impacts elimination of 60 beachfront parking spaces may have on public access to the ocean and shoreline. It may be that some loss of parking at Fletcher Cove can be found to be consistent with the public access policies of the Coastal Act. However, the information provided by the applicant does adequately demonstrate what an acceptable loss of parking may be. Any detailed parking analysis that attempts to evaluate the loss of beach parking spaces should at a minimum be conducted during the summer, include identification of special events or holiday use and include an evaluation of the future needs for beach parking based on anticipated local and regional population growth.

Therefore, without adequate evidence to support the loss of parking, the Commission finds that the elimination of approximately 2/3 of the existing parking supply at Fletcher

~~is premature, may be excessive and will result in significant impacts on public beach access inconsistent with Coastal Act policies.~~

The second question raised by the proposed development to eliminate 60 parking spaces at Fletcher Cove is whether the loss of the parking can be adequately mitigated as proposed by the parking lot 250 to 300 ft. southeast of the beach park. The applicant is proposing to replace the 60 spaces removed from Fletcher Cove, a highly desirable parking location for the beach and surf, with the "Distillery" parking lot. Currently beachgoers have direct access to the beach via a 15 ft. wide ramp located directly adjacent to the parking lot. While parking an extra 250 to 300 ft. from the park and crossing a street may not be substantially difficult for some beachgoers, it would presumably be less desirable and may actually present an impediment for others. In addition, there is a concern as to whether there are in fact available parking spaces at the "Distillery" site to "replace" the 60 spaces removed from Fletcher Cove.

As previously described, the City purchased the "Distillery" lot property with the intent to construct a public parking structure sometime in the future. After the purchase, the City added 74 asphalted parking spaces to the already existing 50 spaces by paving a dirt area and striping without benefit of a coastal development permit. Today the "Distillery" lot has 124 parking spaces, 74 of which are unpermitted, and the City no longer has plans to construct a parking structure. The applicant has documented that 50 of the existing 124 spaces are deed restricted for use during the normal workweek by a neighboring property owner through the year 2022. ~~In addition, another 8 spaces are leased from the City for use by an adjacent restaurant.~~ Therefore, during the weekday only 74 spaces (out of the total 124) are available without restriction for use by the general public. However, the lot contains an adequate number of spaces to offset the 60 spaces removed from Fletcher Cove. To assure that the general public and beachgoers will not be restricted from using these spaces, Special Conditions #10 prohibits the applicant from leasing or otherwise restricting the use of these 74 spaces. In addition, Special Condition #8 requires that adequate signage be installed at the Distillery lot that identifies these spaces as available at all times to the general public and also identifies when the other 50 spaces are available for public use. In addition, Special Condition #8 requires that signage be placed at Fletcher Cove Park identifying the location of the public parking spaces at the Distillery lot. With these conditions, the Commission can be assured that when the Fletcher Cove parking lot is at capacity, beach users will be effectively directed to the nearby public parking spaces.

~~However, these "available" spaces are actually being used by patrons of the surrounding businesses such that very few, if any, would be available to beachgoers during the workweek. Based on photographic evidence, informal surveys by Commission staff and comments from the public, it is apparent that the existing 124-spaced parking lot is currently used to a substantial level during regular business hours, presumably by patrons of the surrounding commercial establishments. In addition, while the Commission does not agree the submitted parking study is adequate to document parking usage during the peak summer months, it does contain some useful data. The parking study submitted by the applicant suggests that during weekdays (between the hours of 8:00 a.m. to 6:00~~

p.m.), there are few times when the Distillery lot has more than 60 parking spaces available. In addition, the study suggests that on weekends, between the hours of 10:00 a.m. and 1:00 p.m. (peak beach usage hours), there are fewer than 60 parking spaces available in the Distillery parking lot.

The City's parking study also supports another concern with the proposed project. ~~At all times during the parking study, even times when very few spaces were available in the Distillery lot, there were parking spaces available at the Fletcher Cove parking lot. What this suggests is that people are not using the Distillery lot to go to the beach. Thus, the City's parking study does not document that adequate replacement parking for the 60 spaces eliminated at Fletcher Cove can be found at the Distillery lot during the summer workweek or at all times on weekends. If there were a suitable means to assure the unencumbered spaces at the Distillery lot would be reserved for exclusive use by beachgoers, there would be inadequate parking for businesses in the area and a spillover effect on street parking and the remaining spaces at Fletcher Cove. Therefore, the proposed development would have an adverse affect on the public's ability to access the shoreline by the elimination of 60 public parking spaces at Fletcher Cove, especially during the summer months. Accordingly, the project will not protect public access and, therefore, must be denied.~~

~~While removal of 60 public parking spaces at Fletcher Cove will not protect public access, it is possible that some reduction in the number of public parking spaces (possibly up to a third) could be found consistent with Coastal Act policies at Fletcher Cove along with the development of additional passive recreational areas. In fact, In addition, the City has identified a number of improvements in the area that may overtime reduce the need for parking spaces at Fletcher Cove. In the 1990's, the City restriped several streets surrounding Fletcher Cove to increase the number of parking spaces. The applicant's parking study identifies that the amount of residential and public street parking spaces in the area surrounding Fletcher Cove and suggests excess parking is available on weekdays and weekends during the summer. However, as described previously, these surveys were not performed during the summer.~~

In addition, the City has a new pedestrian bridge under construction that will allow residents to safely cross the grade-separated railroad tracks toward the beach on the south side of the City and plans to construct an additional pedestrian bridge on the north side of the City. Both bridges will facilitate residents wanting to walk to the beach from points inland of the railroad and Highway 101. In addition, the City is currently considering an application for a "multi hundred" parking structure at the nearby North County Transit District train station which is located approximately ½ mile east of Fletcher Cove Beach and inland of Highway 101. A public shuttle system serving Fletcher Cove and the Highway 101 commercial corridor from such an inland parking reservoir could provide for non-automobile circulation in the area and a substitute means of maintaining and enhancing public beach use consistent with Section 30252. (The parking demand study required by Special Condition #9 also includes a provision for the evaluation of a public shuttle system serving Fletcher Cove and the Highway 101 corridor.) Each of these public improvements has the potential to reduce the need for public parking spaces at

Fletcher Cove, although probably not eliminate that need entirely. Parking close to the beach is still going to be necessary for those wanting to surf or swim before work or those wanting to quickly access the beach during lunch hours or for those that cannot or do not want to walk or utilize public transportation.

~~Prior to incorporation of the City of Solana Beach, Fletcher Cove was a County park and one of the recreational facilities addressed in Policy 21—24 in the Commission-certified San Diego County LCP Land Use Plan (attached as Exhibit 5). Policy 24 includes standards for beach facility improvements necessary to carry out the public access and recreation policies of the Coastal Act that protect lower cost visitor and recreational facilities and oceanfront land for recreational use. These standards and projected use levels for Fletcher Cove (referred to as Solana Beach County Park) were developed nearly 25 years ago and, it is reasonable to assume, demand for the City's only beachfront park and parking lot has increased over time. In addition, the proposed passive blufftop recreational improvements and general population increase are reasons to expect greater park attendance in the future.~~

~~Policy 24 suggests beach parks with high intensity use and including upland game courts, picnic tables, restrooms and lifeguard service (such as exists at Fletcher Cove) should have at least sixty (60) parking spaces. While it is true that the existing parking lot may, at some times, be underutilized, especially during the winter months, there is no information to support this will always be the case and once the parking is gone, it would be difficult to replace. In other areas in San Diego County, there are examples where beachfront parking is non-existent or inadequate resulting in traffic and other spillover affects to surrounding areas.~~

~~In summary, Fletcher Cove Beach Park is a valuable coastal resource of local, regional and statewide significance and a lower cost visitor and recreational facility protected by Section 30213 of the Act. Section 30223 requires reservation of upland areas necessary to support coastal recreational uses which would include public beach parking facilities. The proposed project would result in the permanent elimination of 60 public parking spaces without identifiable mitigation to adequately offset the potential adverse impact it would have on public access especially during high use periods such as the summer months. Therefore, the Commission finds the proposed development is premature and must be denied as inconsistent with all the public access and recreation policies of the Coastal Act cited above.~~

Since the applicant has not provided detailed plans for the proposed grassy or sandy park that is proposed to replace the 60 eliminated parking spaces, Special Condition #4 has been attached to require the submission of final plans for Executive Director review and approval. In addition, since the applicant has not submitted landscape plans, Special Condition #5 requires submission of final landscape plans for Executive Director review and approval. The condition includes a requirement for the use of drought tolerant native, non-invasive plant materials and a prohibition in the use of rodenticides. To protect existing public views of the ocean, new trees shall be prohibited in areas that affect public views of the ocean. To assure there is no potential for accidental breakage

of irrigation devices on the subject blufftop lot which could lead to erosion or bluff failure, the condition also prohibits the installation of permanent irrigation devices. Finally, to assure no contaminants from the development enter into the ocean waters, Special Condition #7 requires the applicant to incorporate use of Best Management Practices during construction activities. As conditioned, the project can be found to be consistent with Sections 30231, 30251 and 30253 of the Coastal Act.

In summary, the applicant has provided documentation indicating that there is currently sufficient available parking on the nearby streets and the nearby Distillery lot to accommodate the loss of 60 parking spaces within Fletcher Cove Park. In addition, the subject permit has been conditioned to assure that at least 74 spaces at the nearby Distillery lot remain available to the general public and to assure that adequate signage at both Fletcher Cove Beach Park and the Distillery identifies its location. A condition has also been included to require a parking demand study be performed following elimination of the 60 parking spaces. The permit has also been conditioned to require construction activity associated with the permit will not adversely affect public access. With these conditions, the proposed development has been found to be consistent with the public access and recreation policies of the Coastal Act.

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

Based on the above discussion, the proposed removal of 60 public parking spaces in close proximity to the shoreline without adequate mitigation has been found to be inconsistent with the public access and recreation policies of the Coastal Act. Removal of these parking spaces will not have significant adverse impacts on public access to the shoreline and ocean. The Commission finds that approval of the proposed project will not prejudice the ability of the City of Solana Beach to prepare a Local Coastal Program that is in conformity with Chapter 3 policies and, therefore, it must be denied.

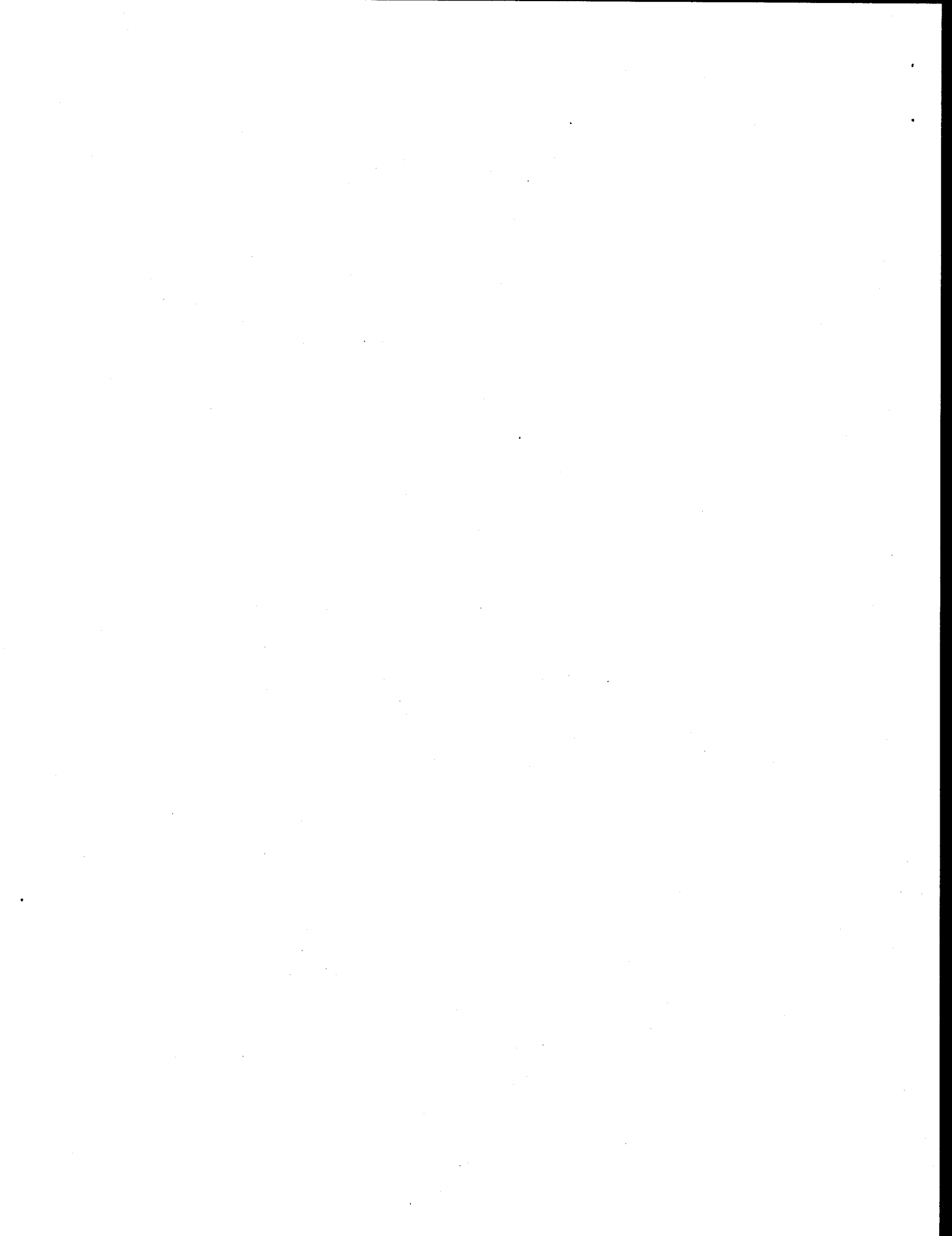
5. California Environmental Quality Act (CEQA). Section 13096 of the Commission's Code of Regulations requires Commission approval of coastal development permits to be supported by a finding showing the permit to be consistent with any applicable requirements of the California Environmental Quality Act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

~~As described above, the proposed project would have adverse environmental impacts. There are feasible alternatives or mitigation measures available such as the no project alternative that would substantially lessen any significant adverse impacts that the activity may have on the environment such as removing fewer parking spaces or~~

~~providing other replacement parking for any proposed loss of public parking. Therefore, the proposed project is not consistent with CEQA or the policies of the Coastal Act because there are feasible alternatives, which would lessen significant adverse impacts, which the activity would have on the environment. Therefore, the project must be denied.~~

The proposed project has been conditioned in order to be found consistent with the public access, geologic stability, visual and water quality protection policies of the Coastal Act. Mitigation measures, including final plans, restricting work to outside of the summer, a Best Management Program, public access signage, landscape plan and parking monitoring will minimize all adverse environmental impacts. As conditioned, there are no feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse impact which the activity may have on the environment. Therefore, the Commission finds that the proposed project as conditions is the least environmentally-damaging feasible alternative and is consistent with the requirements of the Coastal Act to conform to CEQA.

(\\Tigershark1\Groups\San Diego\Reports\2005\6-05-040 Distillery, Fletcher RF stfrpt.doc)

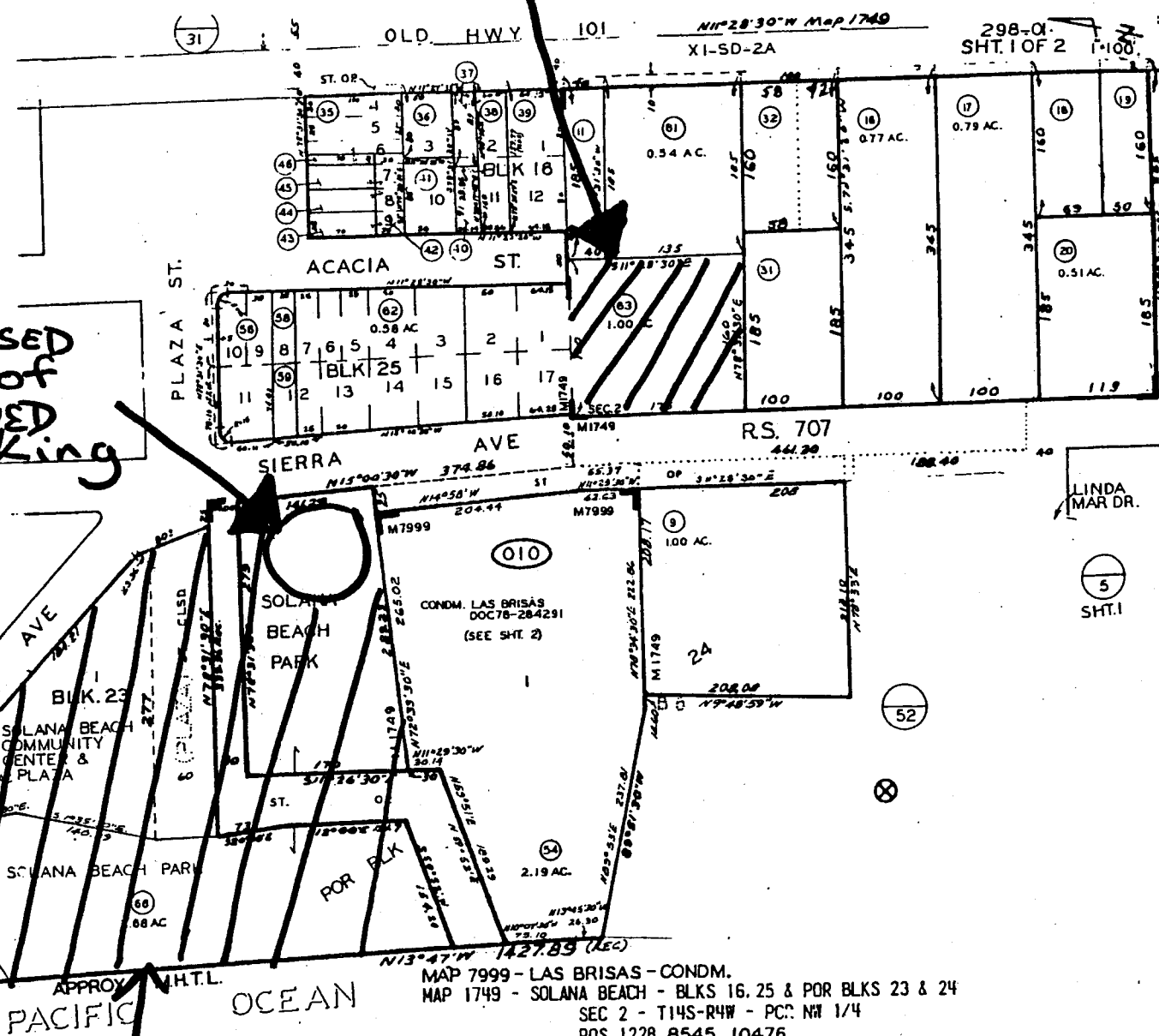


Distillery Site

CHANGES				
BLK	OLD	NEW	YR	CUT
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617	94	79	100	
621	94	79	100	
622	94	79	100	
623	94	79	100	
624	94	79	100	
625	94	79	100	
626	94	79	100	
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Proposed Area of Removed Parking

Fletcher Cove Beach Park



MAP 7999 - LAS BRISAS - CONDM.
 MAP 1749 - SOLANA BEACH - BLKS 16, 25 & POR BLKS 23 & 24
 SEC 2 - T14S-R4W - PC: NW 1/4
 ROS 1228, 8545, 10476

California Coastal Commission

EXHIBIT NO. 2

APPLICATION NO.

6-05-40

Detailed Location Map

298-112

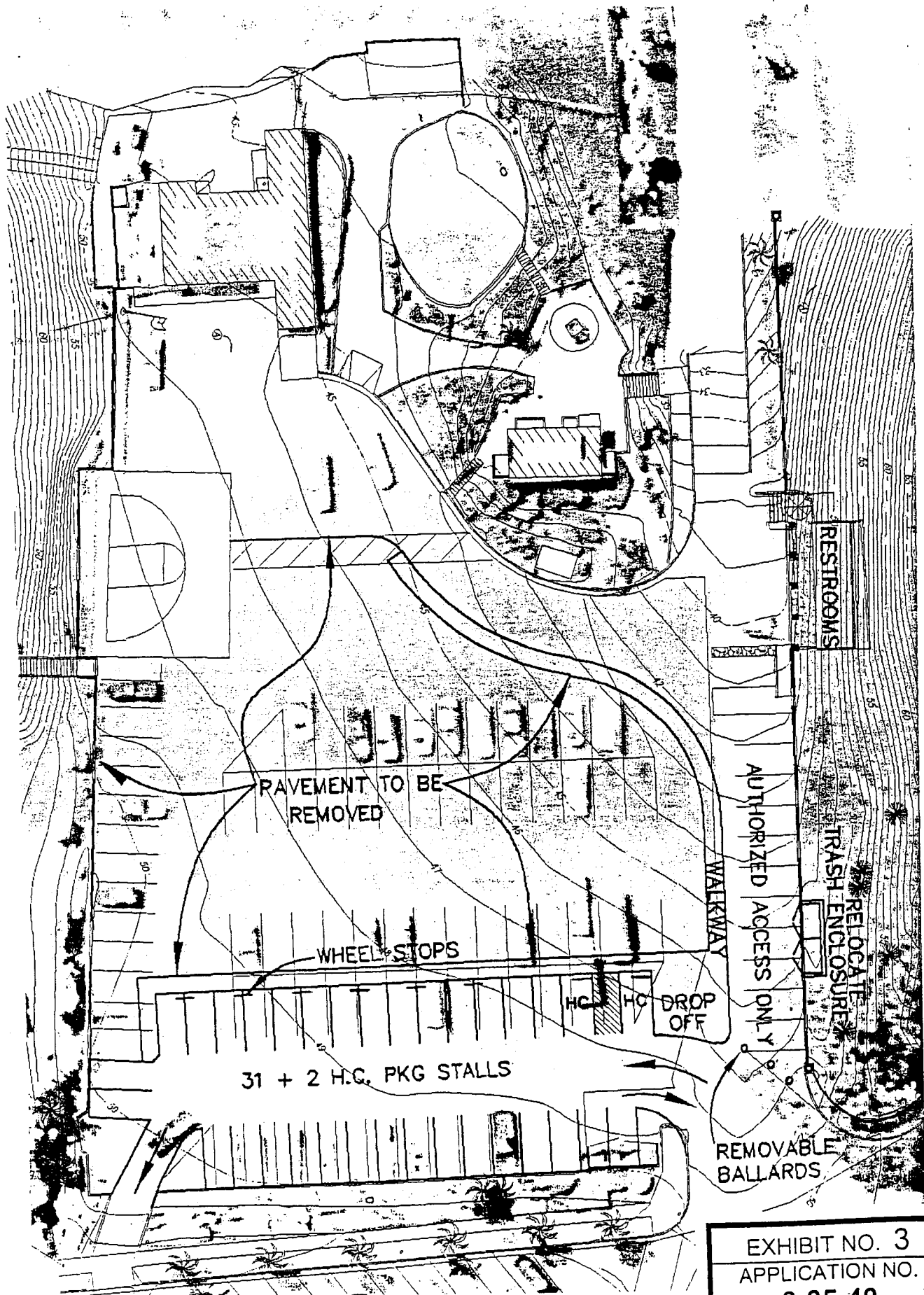
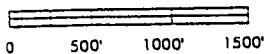
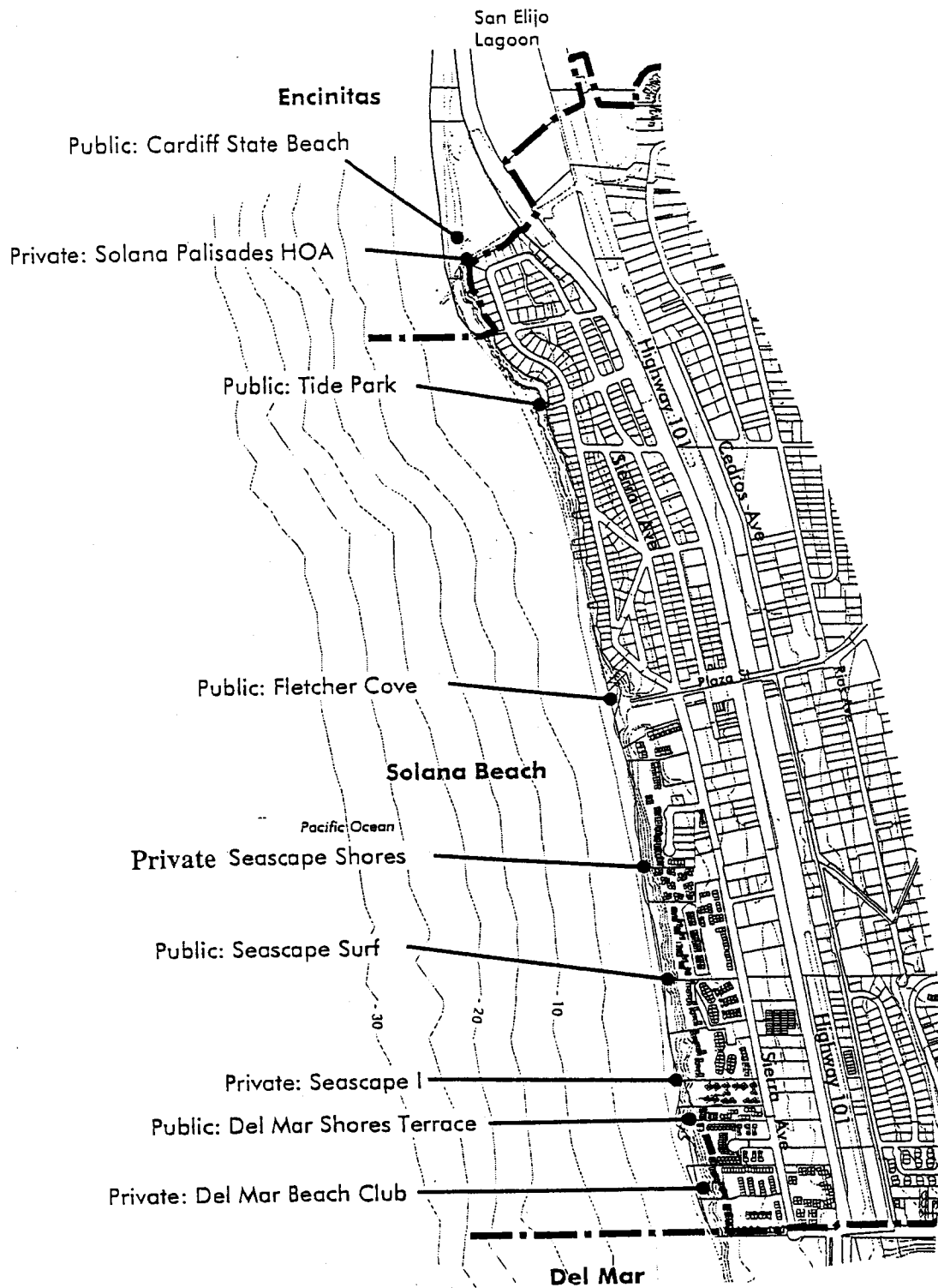


EXHIBIT NO. 3
 APPLICATION NO.
6-05-40
 Fletcher Cove Site
 Plan



Public and Private Vertical Access Points

EXHIBIT NO. 4

APPLICATION NO.

6-05-40

Public (and Private)
Access Locations

RECEIVED
DEC 11 1980

CALIF. COASTAL COMMISSION
SAN DIEGO REGION

SAN DIEGO COUNTY
LOCAL COASTAL PROGRAM

LAND USE PLAN - SAN DIEGUITO
AND
AMENDMENT TO THE SAN DIEGUITO COMMUNITY PLAN


COUNTY OF SAN DIEGO
DEPARTMENT OF PLANNING AND LAND USE

THIS PLAN WAS PREPARED WITH FINANCIAL ASSISTANCE FROM
THE OFFICE OF COASTAL ZONE MANAGEMENT, NATIONAL OCEANIC
AND ATMOSPHERIC ADMINISTRATION, UNDER THE PROVISIONS OF
THE FEDERAL COASTAL ZONE MANAGEMENT ACT OF 1972.

APPROVED BY THE PLANNING COMMISSION
JANUARY 25, 1980

CONDITIONALLY ADOPTED BY THE
BOARD OF SUPERVISORS
OCTOBER 29, 1980
NOVEMBER 19, 1980

(To become effective only after approval and certification
by the California Coastal Commission)

EXHIBIT NO. 5
APPLICATION NO.
6-05-40
San Diego County
LCP Policies
Page 1 of 5
 California Coastal Commission

POLICY GROUP 20
RECREATION AND VISITOR-SERVING FACILITIES

POLICY 21 BEACH AREAS FOR VARYING RECREATIONAL USE INTENSITY

Because

- (A) The California Coastal Act of 1976 requires that "Wherever appropriate and feasible, public facilities...shall be distributed throughout an area so as to mitigate against the impacts, social and otherwise, of overcrowding or overuse by the public of any single area" (C.A. 30212.5); and
- (B) Section 30210 of the Coastal Act states that "maximum shoreline recreational opportunities shall be provided for all people consistent with public safety needs and the need to protect public rights, rights of private property owners, and natural resource areas from overuse.";

THE COUNTY WILL DESIGNATE THE VARIOUS BEACH AREAS FOR HIGH, MEDIUM, AND LOW INTENSITY LEVELS OF USE BASED ON THE CHARACTERISTICS OF THE BEACH RESOURCE, ACCESSIBILITY, SUPPORT FACILITIES, AND CHARACTER OF THE ADJACENT NEIGHBORHOOD; AND WILL PROMOTE THOSE LEVELS OF USE THROUGH SIGNING, ACCESS AND SUPPORT FACILITIES IMPROVEMENTS, AND OTHER APPROPRIATE MEANS.

POLICY 22 HIGH INTENSITY USE

Because

- (A) Beach attendance has more than tripled in the past decade; and will more than double within the next 15-20 years; and
- (B) The Moonlight, San Elijo, Cardiff and South Carlsbad State Beach areas are easily accessible, have beaches of good size and quality, have ample parking and related facility potential to accommodate higher useage levels, and adjacent land uses would not be adversely affected by beach recreation;

THE AREAS OF SOUTH CARLSBAD STATE BEACH, MOONLIGHT BEACH STATE PARK, CARDIFF BEACH STATE PARK AND SAN ELIJO BEACH STATE PARK SHALL BE DESIGNED AS HIGH INTENSITY BEACH RECREATIONAL USE AREAS. (See Access Component Map)

POLICY 23 MEDIUM AND LOW INTENSITY BEACH USE

Because

- (A) Other beach areas within the San Dieguito Coastal Zone are capable of handling only more limited intensity use levels due to a combination of factors which include:
 - (1) varying width and quality of useable sandy beach areas;
 - (2) varying degrees and access difficulty due to steep adjacent bluffs and the type of vertical access facility;
 - (3) limited capability for construction or temporary placement of sanitary, lifeguard tower and other facilities, and difficulty of access for trash removal;
 - (4) scarce present and future vehicle parking opportunities within walking distance of beach areas, due to nearly complete development of adjacent residential neighborhoods;
 - (5) the probability of conflicts with residential areas from intense beach use and traffic on characteristically narrow residential streets; and
- (B) These beach areas are suitable for provision of a less intense type of beach recreational experience ranging from moderately crowded to uncrowded quiet solitude; and
- (C) The factors identified in (4) and (5), above, can be mitigated in some instances by beach access transportation measures proposed in the access component of this plan;

THE COUNTY WILL CLASSIFY THE BEACH AREAS RELATED TO THE FOLLOWING ACCESS POINTS FOR A MEDIUM INTENSITY USE LEVEL:

LEUCADIA BEACH STATE PARK
SEASIDE GARDENS COUNTY PARK
SEA CLIFF COUNTY PARK
TIDE BEACH COUNTY PARK
SOLANA BEACH COUNTY PARK
ENCINITAS COUNTY PARK

AND THE COUNTY WILL CLASSIFY THE BEACH AREAS RELATED TO THE FOLLOWING ACCESS POINTS FOR A LOW INTENSITY USE LEVEL:

NORTH SEA BLUFF VILLAGE
SOUTH SEA BLUFF VILLAGE
"I" STREET VICINITY
SEASCAPE SURF
SEASCAPE SHORES
DEL MAR SHORES
VIA DE LA VALLE

(See Access Component Map)

POLICY 24 STANDARDS FOR BEACH FACILITY IMPROVEMENTS

Because

- (A) The California Coastal Act of 1976 requires that "Lower cost visitor and recreational facilities...shall be protected, encouraged, and, where feasible, provided". (C.A. 30213); and
- (B) The Coastal Act requires that oceanfront land suitable for recreational use shall be protected for recreational use and development ... (C.A. 30221); and
- (C) The County has classified all State and County owned beach areas within the San Dieguito Coastal Zone for varying intensities of use;

THE COUNTY WILL ADOPT BEACH RECREATION FACILITY STANDARDS, AND WILL ENCOURAGE THE STATE TO APPLY SIMILAR STANDARDS TO ITS BEACHES, AS FOLLOWS:

HIGH INTENSITY USE LEVEL BEACHES

- 1. LIFEGUARD TOWERS AND PERMANENT LIFEGUARD SERVICE.
- 2. NO FEE PUBLIC ACCESS AND USE.
- 3. PERMANENT RESTROOMS.
- 4. AT LEAST SIXTY (60) PARKING SPACES.
- 5. TRASH CONTAINERS AND REGULAR INTERVAL CLEANUP AND REMOVAL.
- 6. REGULAR AND FREQUENT KELP PICK-UP SERVICES.
- 7. RECREATIONAL FACILITIES TO INCLUDE VOLLEYBALL STANDARDS AND EQUIPMENT, AND WHERE FEASIBLE, HARD SURFACE GAME COURTS ON UPLAND AREAS.
- 8. SIGNING TO SEPARATE CONFLICTING BEACH USES, (I.E., SURFING AND BATHING, AND TO REGULATE ANIMALS AND MOTOR VEHICLES ON THE BEACH.)
- 9. FOOD AND BEVERAGE CONCESSIONS.
- 10. SURFBOARD, BODY BOARD, AND OTHER BEACH EQUIPMENT RENTAL CONCESSIONS.
- 11. PICNIC TABLES.
- 12. SECURE BICYCLE STORAGE FACILITIES AND BICYCLE RENTAL CONCESSIONS.

MEDIUM INTENSITY USE LEVEL BEACHES

- 1. LIFEGUARD TOWERS AND TEMPORARY LIFEGUARD SERVICE AS USERSHIP WARRANTS.

2. NO FEE PUBLIC ACCESS AND USE.
3. PERMANENT OR PORTABLE RESTROOMS.
4. AT LEAST THIRTY (30) PARKING SPACES.
5. TRASH CONTAINERS AND REGULAR INTERVAL CLEANUP AND REMOVAL.
6. KELP PICK-UP SERVICES.
7. RECREATIONAL FACILITIES TO INCLUDE VOLLEYBALL STANDARDS, AT A MINIMUM.
8. SIGNING TO SEPARATE CONFLICTING BEACH USES, (I.E., SURFING AND BATHING, AND TO REGULATE ANIMALS AND MOTOR VEHICLES ON THE BEACH.)
9. SECURE BICYCLE STORAGE FACILITIES.

LOW INTENSITY USE LEVEL BEACHES

1. NO FEE PUBLIC ACCESS AND USE.
2. PEAK PERIOD LIFEGUARD SERVICE AS USERSHIP WARRANTS.
3. PORTABLE RESTROOMS.
4. 0-30 PARKING SPACES.
5. TRASH CONTAINERS AND REGULAR INTERVAL CLEANUP AND REMOVAL.
6. OCCASIONAL KELP PICK-UP SERVICES.
7. SECURE BICYCLE STORAGE FACILITIES.

POLICY 25 ACQUISITION AND DEVELOPMENT OF NEIGHBORHOOD PARK FACILITIES

Because the San Dieguito Coastal Zone:

- (A) Has been found deficient in meeting the Parks and Recreation Department criteria for the number and acreage of local resident-serving parks; and
- (B) Has not produced sufficient park lands dedication ordinance funds to purchase high-cost lands within the coastal zone for future park sites, and the scarcity of developable lands in this area severely limits future revenues from this source and limits the choices for future park sites;

540 Marvista Drive
Solana Beach, CA 92075-1330
(858) 755-6484
Jpeterchem@aol.com
March 11, 2004

Mr. Gary Cannon
Coastal Commission
San Diego Coast District Office
7575 Metropolitan Drive Suite 103
San Diego, CA 92108

Re: Solana Beach Fletcher Cove Parking

Dear Mr. Cannon:

I am writing you about my concern with regards to the proposed Fletcher Cove Master Plan for Solana Beach. Solana Beach is fortunate to have the parking at Fletcher Cove, which allows such convenient access, especially for families, to the beach. It seems our City Council is determined to make a park out of the parking lot. I believe their plan would be to count parking spaces at the Distillery lot across from our Post Office and new parking at the train station to fulfill the parking that the Coastal Commission would require. I feel that this is a huge mistake as the Distillery lot, which is the closer of the two lots is usually full from the businesses in the area. On a cool day in May at 10:00 AM, I counted only nine available parking spaces. This is certainly not adequate for a warm summer day for beach parking. Parking at the train station would certainly be inconvenient, especially for families with small children, as one takes the various items such as beach chairs, umbrella, ice chest, boogie boards, etc. In addition safety would be a factor as there are several streets to be crossed. We do have two parks in the area and I feel that most people go to Fletcher Cove to go to the beach. Additionally the top of the cove is windy and cool most of the year not making it ideal for picnics or a tot lot. Parks do require watering which probably lead to more bluff failures which is already a huge problem. I agree that the Marine Safety Headquarters and the bathrooms need to be rebuilt but please consider the problem of access to the beach if the present parking is eliminated as part of the Fletcher Cove Master Plan.


Thank you.

Sincerely,

Ann L. Peter

Ann L. Peter

cc. Barry Johnson, City Manager
Joe Kellejian, Mayor

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APPLICATION NO.
6-05-40
Letters of Oppositic
Page 1 of 3
 California Coastal Commiss

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540 Marvista Drive
Solana Beach, CA 92075-1330
(858) 755-6484
March 4, 2005

Mr. Gary Cannon
Coastal Commission
San Diego Coast Office
7575 Metropolitan Drive Suite 103
San Diego, CA 92108

RECEIVED

MAR 07 2005

CALIFORNIA
COASTAL COMMISSION
SAN DIEGO COAST DISTRICT

RE: Solana Beach Fletcher Cove Parking

Dear Mr. Cannon:

I am writing you as a follow up to my letter of March 11, 2004 about my concern regarding the proposed Fletcher Cove Master Plan for Solana Beach. It seems our City Council is still determined to do away with convenient beach access parking. While watching a recent council meeting, I learned that they want to reduce the parking spaces from the current ninety-two (92) to twenty-seven (27). It is difficult to understand their reasoning unless none of them actually use the beach at Fletcher Cove. Even if they convert most of the parking into a park, I don't believe that twenty-seven parking places would be enough for a park, much less the beach. They apparently have applied to the Coastal Commission to substitute parking in the Distillery lot across from the Post Office for those sixty-five (65) that will be lost from the Fletcher Cove lot. I don't believe that the council understands that the lot is often full or close to it. On a recent rainy day I counted only ten (10) available parking spaces in mid morning in the Distillery lot which is a lot less than sixty-five. I also believe that residents living on the adjacent streets will be impacted with parking problems if the present ninety-two parking places are reduced. Please consider the access issue for those people that actually use the Fletcher Cove beach.

Thank you.

Sincerely,

Ann L. Peter

Ann L. Peter

cc. Barry Johnson, City Manager

March 7, 2005

RECEIVED

MAR 08 2005

CALIFORNIA
COASTAL COMMISSION
SAN DIEGO COAST DISTRICT

Mr. Gary Cannon
Coastal Commission
San Diego Coast District Office
7575 Metropolitan Dr. Ste 103
San Diego, CA 92108

Re: Solana Beach Fletcher Cove Parking

Dear Mr. Cannon:

You probably have received many opinions concerning the proposed beach parking area of Solana Beach being made into a "beautiful" park. In truth, there have to be many citizens who frequent Fletcher Cove who have never been approached as to whether or not this plan is what they really want. In my view, most of the citizens who have been listened to are people who only want "beauty," not thinking logically about practicality.

It is a fact, I think, that there is not nearly enough convenient parking for the city of Solana Beach, and particularly near Fletcher Cove. To remove parking space that is already in place verges on being ridiculous.

All the other ideas and plans of parking garages are not only unaffordable but a long time in the future, as projected, and in some cases (as part of our train station, for instance), not only too far away from the beach but also dangerous for younger folks with beach paraphernalia to carry, as well as younger children concerning traffic woes.

Already in progress are the new restrooms, which will be nice. We also have a smaller park (green grass, tables, etc.) that has been in existence for many years and which I think is adequate.

Please consider these talking points as I feel I am very aware of practical problems which will be magnified if the present parking lot is either diminished or eventually done away with. At least, if these parking structures are to be a reality, I would suggest doing them prior to removing our present beach parking.

Sincerely,

Robert Wilkens

Robert Wilkens

cc: Barry Johnson, City Manager
Tom Campbell, Mayor



Katz, Okitsu & Associates
Planning & Engineering

April 12, 2005

Mr. Chandra Collure
City of Solana Beach
635 South Highway 101
Solana Beach, California 92075

SUBJECT: FLETCHER COVE PARKING STUDY

Mr. Collure:

The City of Solana Beach is considering modifying the parking lot at Fletcher Cove beach to comply with the Fletcher Cove Master Plan. The modification includes the reconfiguration of the beach parking lot to remove 62 existing parking spaces. Katz, Okitsu & Associates, experts in parking analysis and traffic engineering, were retained by the City of Solana Beach to perform a parking occupancy and turnover study of the area surrounding Fletcher Cove. Katz, Okitsu & Associates has conducted numerous parking studies in the San Diego area, including work for the San Diego Housing Commission, San Diego Unified Port District, and the Grossmont-Cuyamaca College District. The Fletcher Cove parking study will determine if 62 spaces can be removed from the Fletcher Cove beach parking lot without adversely affecting parking capacity in the surrounding area for beachgoers' parking.

The study includes an evaluation of on-street parking on Sierra Avenue, Acacia Avenue, and Pacific Avenue. An evaluation of off-street parking in the Fletcher Cove and Old Distillery parking lots is also included in the study. Parking was evaluated under both weekday and weekend conditions. Attachment A contains graphics that show the study area.

Methodology

Inventory

To determine the number of available parking spaces, an inventory of on- and off-street parking in the study area was performed. The amount and type of parking spaces were identified for each block and parking lot in the study area. The types of parking spaces in the study area include unlimited spaces (no time limits or other restrictions), 15-minute time limit spaces, and disabled spaces. A portion of the spaces in the Old Distillery parking lot are restricted to parking for the Bridge Medical offices only on weekdays between 7:00 AM and 6:00 PM. Therefore, these spaces were not included as parking supply during weekdays. In addition, it should be noted that currently construction is taking place at Fletcher Cove. Because of this, only 62 of the total 93 spaces in the lot were available for parking at the time of the study.

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6-05-40
Parking Study
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California Coastal Commission



Occupancy

Parking counts were performed on two weekdays and two weekend days. Counts were averaged for weekdays and weekend days. Counts were taken between 7:00 AM and 7:00 PM on Thursday, February 24, 2005, Saturday, February 26, 2005, Sunday, February 27, 2005, and Tuesday, March 1, 2005. The weather was not rainy on these days. Parking occupancy counts were performed every hour. For this part of the study, a survey of each parked car in the study area was performed to determine the total number of parked cars in the study area each hour. For the purposes of this analysis, an occupancy that is over 85 percent is considered over capacity.

Adjustment Factor

Because occupancy parking counts were taken during the winter months, they were increased to simulate conditions during the peak summer season. Weekday counts were increased 11 percent and weekend counts were increased 43 percent.

This increase was established after reviewing a number of different sources. The first source was traffic counts taken in the study area during winter and summer months. These were compared to determine how much higher summer traffic volumes were than winter traffic volumes in Solana Beach. The second source was two parking studies of other beach areas, one performed in the Pacific Beach neighborhood of San Diego and one performed at state beaches in Northern California. These studies showed the difference between summer and winter traffic and parking demand in these areas. Each of these sources showed a seasonal variation in traffic volumes and parking demand of less than 15 percent.

Because the difference in summer and winter traffic and parking shown in these studies was reasonably low, a final source of information on seasonal demand variation was reviewed: *Shared Parking* published by the Urban Land Institute (ULI). ULI is an independent, nonprofit research and educational organization whose mission is to improve the quality and standards of land use development. It conducts a large amount of research within the field, including the shared parking research used for this analysis. *Shared Parking* does not include information about beach parking demand, but it does contain data related to seasonal variation in hotel parking and room occupancy, which was considered sufficiently similar. This information is based on data from over 60 major hotels throughout the United States. The data shows a difference of 11 percent between weekday occupancy in February and weekday occupancy in August (the peak month). It shows a difference of 43 percent between weekend occupancy in February and weekend occupancy in August. Because they were the most conservative, these increases were applied to the parking demand data in this study. Attachment B includes the references used to determine this adjustment factor.

Turnover

Parking turnover counts were performed every two hours. Counts were averaged for weekdays and weekend days. For this part of the study, the license plate numbers of each parked car were written down and compared to the license plate numbers of the car parked in the same space



during the previous turnover count. From this comparison the amount of time that each car in the study area remained parked was determined to the nearest two-hour increment.

User Observations

In addition to parking counts, general observations of the Old Distillery parking lot users were made to determine the reason they were parked in the Old Distillery lot. While this was not a comprehensive survey, some meaningful information was gathered on lot users.

Analysis

Parking Supply

A survey of parking supply was performed to determine the total number of parking spaces in the study area. For on-street locations where parking spaces were not marked, a length of 22 feet per space was assumed. Table 1 summarizes the available spaces in the study area.

Table 1
Study Area Parking Spaces

Location	Number of Spaces		
	General Purpose	15 Minute Limit	Disabled
On-street spaces			
N. Sierra Ave (Plaza St to 202 N. Sierra Ave)	19	0	0
S. Sierra Ave (Pacific St to Linda Mar Dr)	48	7	1
Pacific Ave (Plaza St to Helix Ave)	22	0	0
S. Acacia Ave (S. of Plaza St)	18	0	0
Total On-street spaces	107	7	1
Off-street spaces			
Fletcher Cove Lot	62 ¹	0	0
Old Distillery Lot	140 ²	0	5 ³
Total Off-street spaces	202²	0	5
TOTAL spaces in study area	309²	7	6

¹51 of the spaces in the Fletcher Cove lot were taken up by construction at the time of this study. Therefore, these spaces were not included as part of the study area supply.

²69 general purpose spaces and 3 disabled spaces limited to parking for Bridge Medical offices only on weekdays between 7:00 AM and 6:00 PM.

Parking Occupancy

Parking occupancy counts were performed on both weekdays and weekend days. The two weekday counts were averaged to determine the average weekday parking occupancy in the study area. The two weekend days were averaged to determine the average weekend parking occupancy in the study area. Because occupancy parking counts were taken during the winter months, they were increased to simulate conditions during the peak summer season. Weekday counts were increased 11 percent and weekend counts were increased 43 percent. For the purposes of this analysis, an occupancy that is over 85 percent is considered over capacity. Although counts were averaged, there was not a significant difference between the two weekdays and the two weekend days. Attachment C contains the daily count data used in this analysis.



Table 2 shows the average weekday parking occupancy in the study area. The occupancy data shown in Table 2 has been increased by the adjustment factor discussed above. Occupancy is reported for each hour between 7:00 AM and 7:00 PM. For example, occupancy reported in the "7 AM" column of Table 2 represents occupancy between 7:00 AM and 8:00 AM. Locations with over 85 percent occupancy are shown in bold.

As shown in Table 2, the average weekday peak hour of occupancy for on-street spaces is 12:00 PM. At this time, the on-street parking occupancy is 51 percent. The average weekday peak hour of occupancy for off-street spaces is 12:00 PM. At this time, the off-street parking occupancy is 60 percent. The average weekday peak hour of occupancy for all spaces is 12:00 PM. At this time, the total parking occupancy is 56 percent, which is below the practical capacity of the study area. It should be noted that occupancy on S. Acacia Avenue and N. Sierra Avenue north of Plaza Street exceeds 85 percent during portions of the day, which is above the practical capacity of this location. However, these locations are the furthest from the beach lot, and are not expected to be required often for beach parking. The average weekend peak occupancy is slightly higher than the average weekday peak occupancy for the study area

Table 2
Average Weekday Percent Parking Occupancy (Adjusted for Seasonal Variation)

Location	Hour											
	7 AM	8 AM	9 AM	10 AM	11 AM	12 PM	1 PM	2 PM	3 PM	4 PM	5 PM	6 PM
On-street												
N. Sierra Ave (Plaza St to 202 N. Sierra Ave)	94%	76%	80%	85%	83%	83%	97%	87%	81%	78%	71%	61%
S. Sierra Ave (Pacific St to Linda Mar Dr)	4%	9%	18%	29%	38%	41%	37%	29%	29%	32%	18%	6%
Pacific Ave (Plaza St to Helix Ave)	3%	0%	11%	10%	13%	13%	8%	8%	3%	3%	0%	0%
S. Acacia Ave (S. of Plaza St)	37%	56%	86%	80%	89%	99%	93%	86%	80%	80%	77%	59%
Total On-street spaces	24%	26%	38%	43%	48%	51%	50%	43%	40%	41%	32%	22%
Off-street												
Fletcher Cove Lot	12%	19%	14%	24%	26%	33%	27%	28%	26%	23%	21%	4%
Old Distillery Lot	25%	43%	65%	84%	83%	83%	76%	73%	72%	58%	42%	25%
Total Off-street spaces	19%	32%	42%	57%	57%	60%	53%	52%	51%	42%	32%	16%
TOTAL in study area	21%	29%	40%	50%	53%	56%	52%	48%	46%	42%	32%	19%



Figure 1 shows the variation in weekday occupancy during the count hours. Attachment A contains additional graphics that show the results of this analysis.

Figure 1
Average Weekday Percent Parking Occupancy (Adjusted for Seasonal Variation)

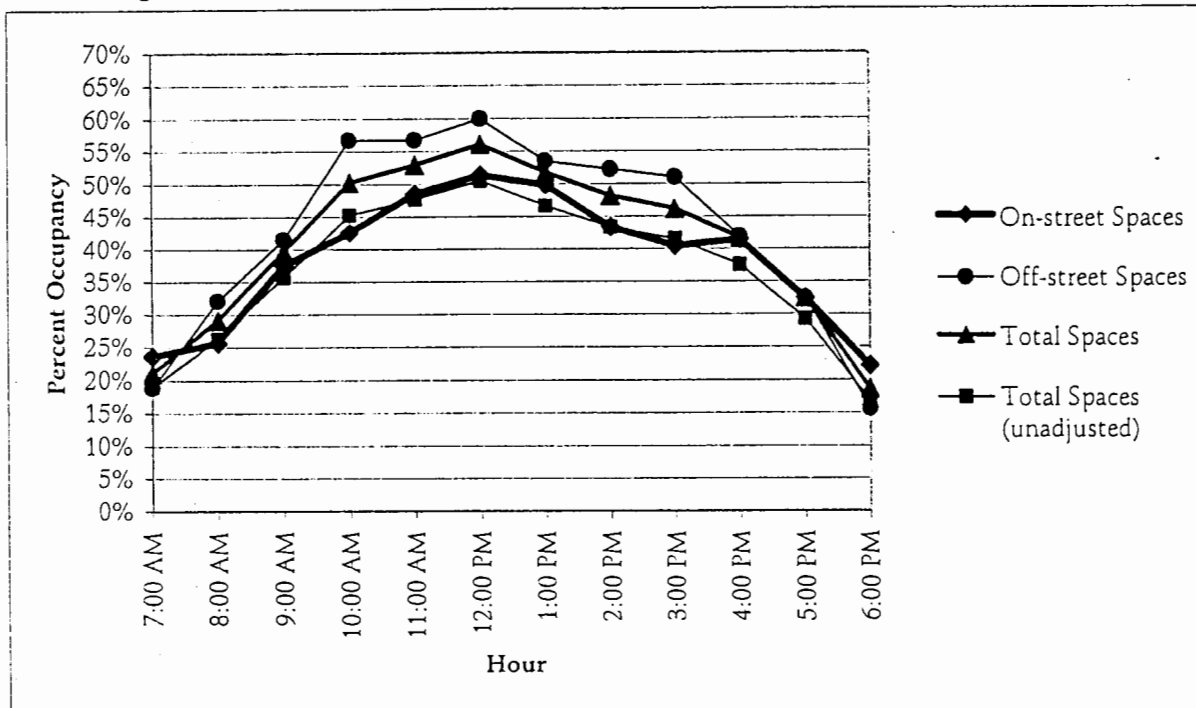


Table 3 shows the average weekend parking occupancy in the study area. The occupancy data shown in Table 3 has been increased by the adjustment factor discussed above. As shown in Table 3, the average weekend peak hour of occupancy for on-street spaces is 11:00 AM. At this time, the on-street parking occupancy is 57 percent. The average weekend peak hour of occupancy for off-street spaces is 11:00 AM. At this time, the off-street parking occupancy is 59 percent. The average weekend peak hour of occupancy for all spaces is 11:00 AM. At this time, the total parking occupancy is 58 percent, which is below the capacity of the study area. It should be noted that occupancy on S. Acacia Street and on N. Sierra Avenue north of Plaza Street exceeds 85 percent during portions of the day, which is above the practical capacity of this location. However, these locations are the furthest from the beach lot, and are not expected to be required often for beach parking. The average weekend peak occupancy is slightly higher than the average weekday peak occupancy for the study area.

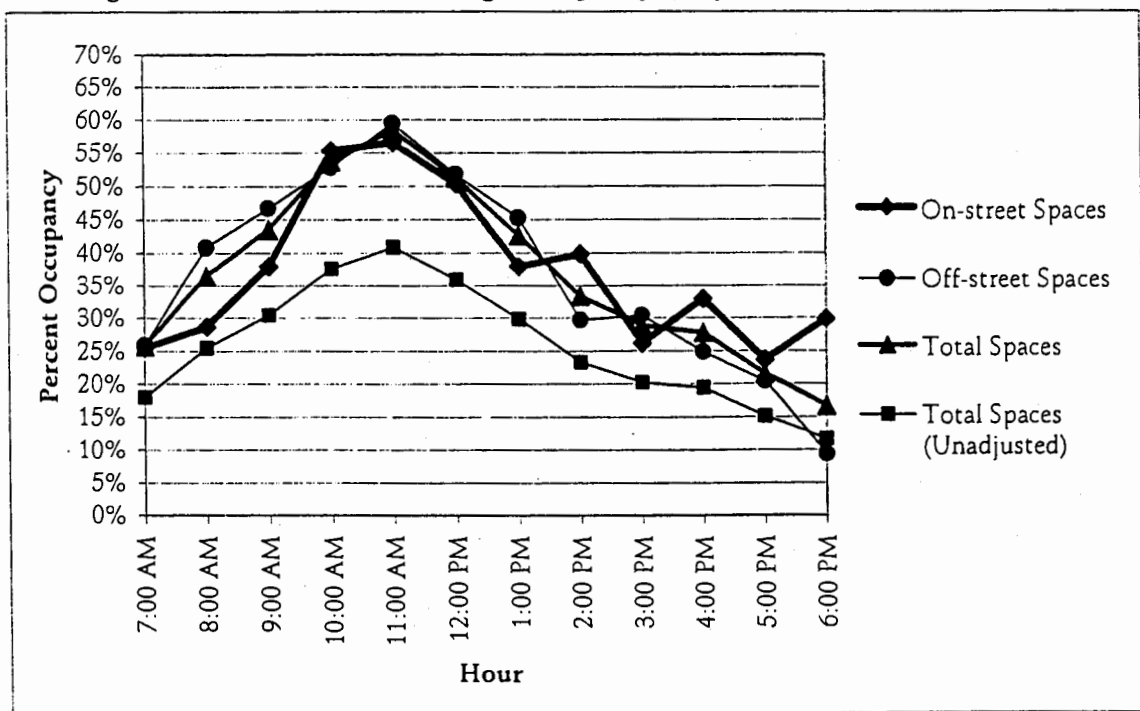


Table 3
Average Weekend Percent Parking Occupancy (Adjusted for Seasonal Variation)

Location	Hour											
	7 AM	8 AM	9 AM	10 AM	11 AM	12 PM	1 PM	2 PM	3 PM	4 PM	5 PM	6 PM
On-street												
N. Sierra Ave (Plaza St to 202 N. Sierra Ave)	98%	90%	90%	87%	102%	79%	79%	79%	90%	83%	90%	98%
S. Sierra Ave (Pacific St to Linda Mar Dr)	1%	5%	20%	50%	61%	45%	38%	27%	17%	18%	10%	8%
Pacific Ave (Plaza St to Helix Ave)	3%	3%	3%	3%	3%	0%	0%	0%	0%	0%	0%	3%
S. Acacia Ave (S. of Plaza St)	52%	68%	79%	103%	60%	99%	40%	87%	20%	68%	24%	60%
Total On-street spaces	25%	29%	38%	55%	57%	50%	38%	40%	26%	33%	24%	30%
Off-street												
Fletcher Cove Lot	38%	45%	43%	31%	36%	17%	17%	14%	18%	24%	23%	7%
Old Distillery Lot	21%	39%	48%	62%	70%	67%	57%	36%	36%	25%	19%	10%
Total Off-street spaces	26%	41%	47%	53%	59%	52%	45%	30%	30%	25%	20%	9%
TOTAL in study area	26%	36%	44%	54%	58%	51%	43%	33%	29%	28%	22%	17%

Figure 2 shows the variation in weekend occupancy during the count hours. Attachment A contains additional graphics that show the results of this analysis.

Figure 2
Average Weekend Percent Parking Occupancy (Adjusted for Seasonal Variation)





Available Parking Spaces

Table 4 shows the average weekday number of available parking spaces in the study area. This represents the number of spaces that are unoccupied between 7:00 AM and 7:00 PM. For example, the available spaces reported in the "7 AM" column of Table 4 represent the number of empty spaces between 7:00 AM and 8:00 PM. It should be noted that the available spaces do not include the 31 spaces currently taken up by construction in the Fletcher Cove parking lot. Figure 3 graphically shows this data. Attachment A contains graphics that show the results of this analysis.

As shown in Table 4, on the average weekday there are a minimum of 56 on-street parking spaces available between 7:00 AM and 7:00 PM in the study area. On the average weekday there are a minimum of 54 off-street parking spaces available between 7:00 AM and 7:00 PM in the study area. Overall in the study area, there are a minimum of 110 parking spaces available between 7:00 AM and 7:00 PM on the average weekday.

Table 4
Average Weekday Available Spaces (Adjusted for Seasonal Variation)

Location	Hour											
	7 AM	8 AM	9 AM	10 AM	11 AM	12 PM	1 PM	2 PM	3 PM	4 PM	5 PM	6 PM
On-street												
N. Sierra Ave (Plaza St to 202 N. Sierra Ave)	1	4	4	3	3	3	1	2	4	4	6	7
S. Sierra Ave (Pacific St to Linda Mar Dr)	54	51	46	40	35	33	35	40	40	38	46	53
Pacific Ave (Plaza St to Helix Ave)	19	22	11	12	9	9	14	14	19	19	22	22
S. Acacia Ave (S. of Plaza St)	11	8	2	4	2	0	1	2	4	4	4	7
Total On-street spaces	88	85	72	66	59	56	58	65	68	67	78	90
Off-street												
Fletcher Cove Lot	55	50	53	47	46	41	45	45	46	48	49	59
Old Distillery Lot	55	41	26	11	13	13	18	20	20	31	42	55
Total Off-street spaces	109	92	79	58	58	54	63	65	66	78	91	114
TOTAL in study area	197	177	151	124	118	110	121	130	135	146	169	203



Figure 3
Average Weekday Available Spaces (Adjusted for Seasonal Variation)

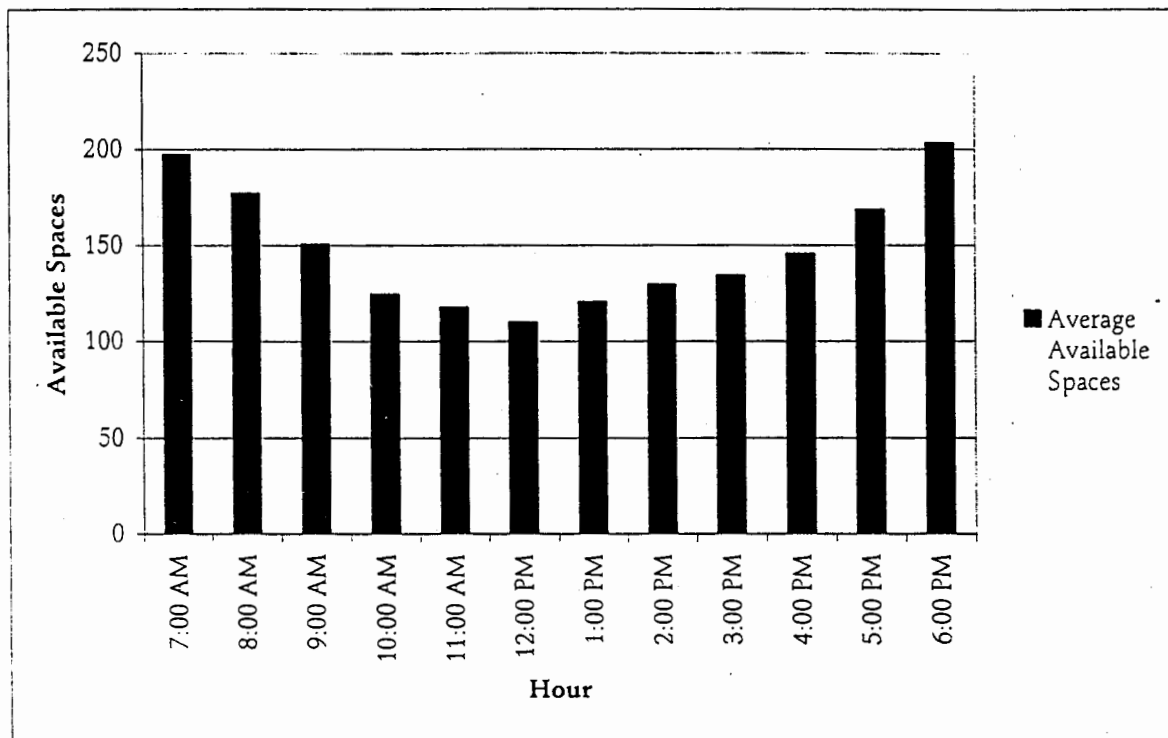


Table 5 shows the average weekend number of available parking spaces. Attachment A contains graphics that show the results of this analysis. As shown in Table 5, on the average weekend day there are a minimum of 50 on-street parking spaces available between 7:00 AM and 7:00 PM in the study area. On the average weekend day there are a minimum of 84 off-street parking spaces available between 7:00 AM and 7:00 PM in the study area. Overall in the study area, there are a minimum of 134 parking spaces available between 7:00 AM and 7:00 PM on the average weekend day. Figure 4 graphically shows this data.

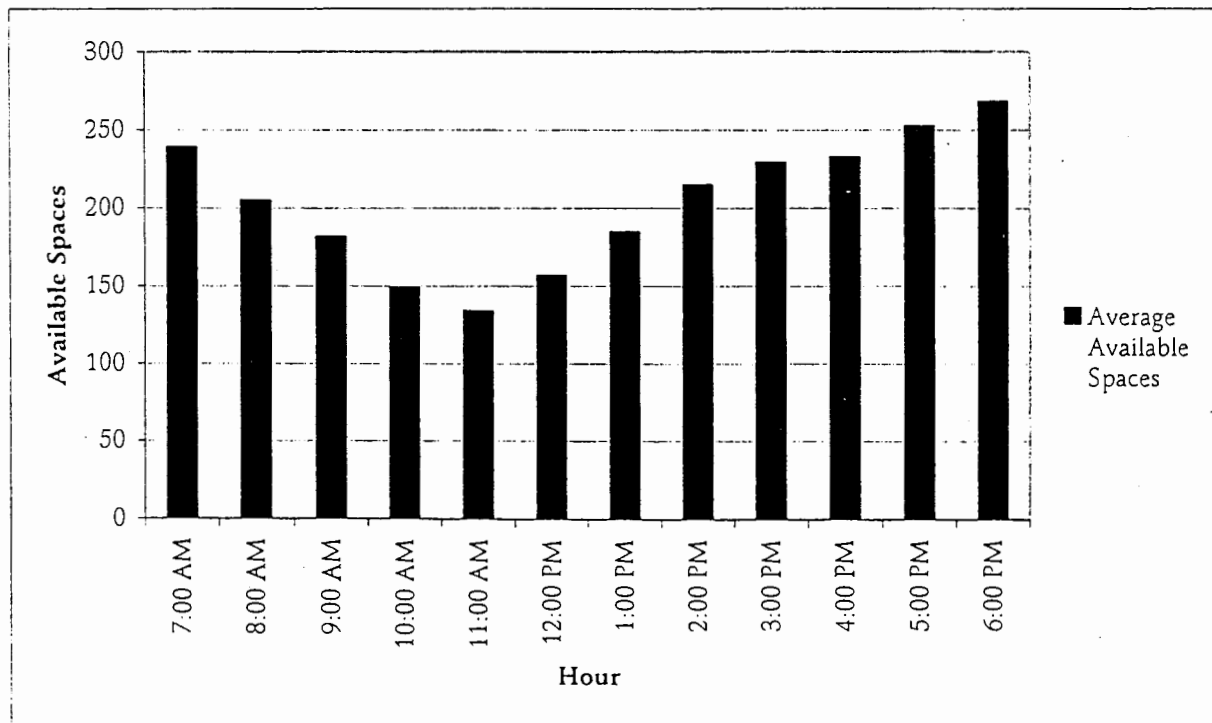


Table 5
Average Weekend Available Spaces (Adjusted for Seasonal Variation)

Location	Hour											
	7 AM	8 AM	9 AM	10 AM	11 AM	12 PM	1 PM	2 PM	3 PM	4 PM	5 PM	6 PM
On-street												
N. Sierra Ave (Plaza St to 202 N. Sierra Ave)	0	2	2	3	0	4	4	4	2	3	2	0
S. Sierra Ave (Pacific St to Linda Mar Dr)	55	53	45	28	22	31	35	41	47	46	50	52
Pacific Ave (Plaza St to Helix Ave)	19	19	19	19	19	22	22	22	22	22	22	19
S. Acacia Ave (S. of Plaza St)	9	6	4	Ovr ¹	7	0	11	2	14	6	14	7
Total On-street spaces	86	82	71	51	50	57	71	69	85	77	88	81
Off-street												
Fletcher Cove Lot	38	34	36	43	40	51	51	53	51	47	48	58
Old Distillery Lot	115	89	75	55	44	48	62	92	94	109	117	130
Total Off-street spaces	153	123	110	98	84	100	113	146	144	156	165	188
TOTAL in study area	239	205	182	149	134	157	185	215	229	233	253	268

¹ Over capacity, no available spaces

Figure 4
Average Weekend Available Spaces (Adjusted for Seasonal Variation)





Parking Turnover

Parking turnover counts were performed to determine the length of time vehicles park in the study area. Turnover counts were taken every two hours between 7:00 AM and 7:00 PM. Based on the total vehicles included in the turnover counts, Tables 6 and 7 show the percent of vehicles that stay less than two hours, two hours, four hours, six hours, eight hours, and 10 hours. Table 6 shows the weekday parking turnover and Table 5 shows the weekend parking turnover.

Table 6
Average Weekday Parking Turnover

Location	Length of Stay (hours)					
	Less than 2	2-4	4-6	6-8	8-10	10 or more
On-street spaces						
N. Sierra Ave (Plaza St to 202 N. Sierra Ave)	47%	28%	12%	4%	3%	5%
S. Sierra Ave (Pacific St to Linda Mar Dr)	89%	6%	2%	3%	0%	0%
Pacific Ave (Plaza St to Helix Ave)	73%	27%	0%	0%	0%	0%
S. Acacia Ave (S. of Plaza St)	61%	16%	6%	13%	4%	0%
Total On-street spaces	70%	15%	6%	6%	2%	1%
Off-street spaces						
Fletcher Cove Lot	87%	4%	5%	2%	1%	2%
Old Distillery Lot	87%	4%	5%	2%	1%	2%
Total Off-street spaces	53%	18%	11%	10%	6%	2%
Total in Study Area	61%	17%	8%	8%	4%	2%

As shown in Table 6, 70 percent of the vehicles parked in on-street parking spaces stay for less than two hours on the average weekday. On the average weekday, 53 percent of the vehicles parked in off-street parking spaces stay for less than two hours. Overall, 61 percent of the vehicles that park in the study area on the average weekday stay for less than two hours between 7:00 AM and 7:00 PM.

Table 7
Average Weekend Parking Turnover

Location	Length of Stay (hours)					
	Less than 2	2-4	4-6	6-8	8-10	10 or more
On-street spaces						
N. Sierra Ave (Plaza St to 202 N. Sierra Ave)	46%	16%	22%	2%	5%	10%
S. Sierra Ave (Pacific St to Linda Mar Dr)	93%	2%	2%	3%	0%	0%
Pacific Ave (Plaza St to Helix Ave)	50%	50%	0%	0%	0%	0%
S. Acacia Ave (S. of Plaza St)	73%	3%	18%	5%	0%	3%
Total On-street spaces	74%	7%	11%	3%	1%	3%
Off-street spaces						
Fletcher Cove Lot	81%	13%	4%	2%	0%	0%
Old Distillery Lot	52%	11%	9%	13%	10%	5%
Total Off-street spaces	63%	12%	7%	9%	6%	3%
Total in Study Area	67%	10%	9%	7%	4%	3%



Katz, Okitsu & Associates

Planning & Engineering

Mr. Collure
JA4376
April 12, 2005
Page 11 of 12

As shown in Table 7, 74 percent of the vehicles parked in on-street parking spaces stay for less than two hours on the average weekend day. On the average weekend day, 63 percent of the vehicles parked in off-street parking spaces stay for less than two hours. Overall, 67 percent of the vehicles that park in the study area on the average weekend day stay for less than two hours between 7:00 AM and 7:00 PM.

Parking Users

In addition to the parking occupancy and turnover counts performed in this study, general observations of the Old Distillery parking lot users were made to determine the reason they were parked in the Old Distillery lot. The following describes these observations.

Employee Parking

Portions of the Old Distillery parking lot appear to be used for employee parking. In particular, the southeast portion of the lot is used by employees of business located east of the Old Distillery parking lot, as well as employees of adjacent restaurants. One employee parked in the lot confirmed that some adjacent businesses use the Old Distillery lot for parking. However, the high turnover rates in this lot suggest that the majority of the lot is used by business patrons, beachgoers, or others who stay for only a few hours.

Customer Parking

The Old Distillery parking lot is also used by patrons of adjacent restaurants. On weekends and after hours, the northeast portion of the lot in particular is used by restaurant customers. This may be because some of the nearby restaurants do not have dedicated parking.

Post Office Parking

Some Post Office customers were observed using the southwest portion of the lot for parking, although most were only parked for brief periods of time. Occasionally a post office employee was also observed using the lot.

Construction Parking

Improvements are currently being made to the park area at Fletcher Cove. Because of this, a portion of the existing parking spaces are blocked off, and construction workers employed at the site park in the Fletcher Cove lot. The presence of these workers affected the parking occupancy and turnover counts in this lot. When construction is finished, the workers will no longer park in the Fletcher Cove lot. Therefore, occupancy is expected to be lower, and the turnover is expected to be higher.



Mr. Collure
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Conclusions

Parking occupancy counts were performed on both weekdays and weekend days. Because occupancy parking counts were taken during the winter months, they were increased to simulate conditions during the peak summer season. Weekday counts were increased 11 percent and weekend counts were increased 43 percent. It should be noted that portion of the spaces in the Old Distillery parking lot are restricted to parking for the Bridge Medical offices only on weekdays between 7:00 AM and 6:00 PM. Therefore, these spaces were not included in the parking occupancy counts during weekdays. In addition, construction is currently taking place at Fletcher Cove. Because of this, only 62 of the total 93 spaces in the lot were available for parking at the time of the study.

The average weekday peak hour of occupancy for all spaces is 12:00 PM. At this time, the total parking occupancy is 56 percent when adjusted for seasonal variation. The average weekend peak hour of occupancy for all spaces is 11:00 AM. At this time, the total parking occupancy is 59 percent when adjusted for seasonal variation. Individual off-street parking lots and on-street parking locations may have higher parking occupancy than in the overall study area. However, overall, parking demand is below the study area capacity on both weekdays and weekend days.

The total number of available parking spaces in the study area was determined for the average weekday and weekend day. Overall in the study area, there are a minimum of 110 parking spaces available between 7:00 AM and 7:00 PM on the average weekday. In addition, there are a minimum of 134 parking spaces available between 7:00 AM and 7:00 PM on the average weekend day in the study area. Therefore, even without the 62 spaces that would be removed with the renovation of the Fletcher Cove beach parking lot, there are still sufficient parking spaces in the study area to meet the peak demand on both weekdays and weekend days.

The data collected in this analysis shows that the peak parking demand in the vicinity of Fletcher Cove is well below the practical parking capacity in the area. The area's maximum parking occupancy is less than 60 percent, leaving 110 spaces empty during the peak hour of demand. In addition to these 110 empty spaces, 34 spaces have already been effectively removed because of ongoing construction in the beach lot. Therefore, it is concluded that the removal of additional spaces, for a total of 62 fewer spaces in the Fletcher Cove vicinity, would not decrease the parking supply enough to cause capacity problems in the area.

Sincerely,

Katz, Okitsu & Associates

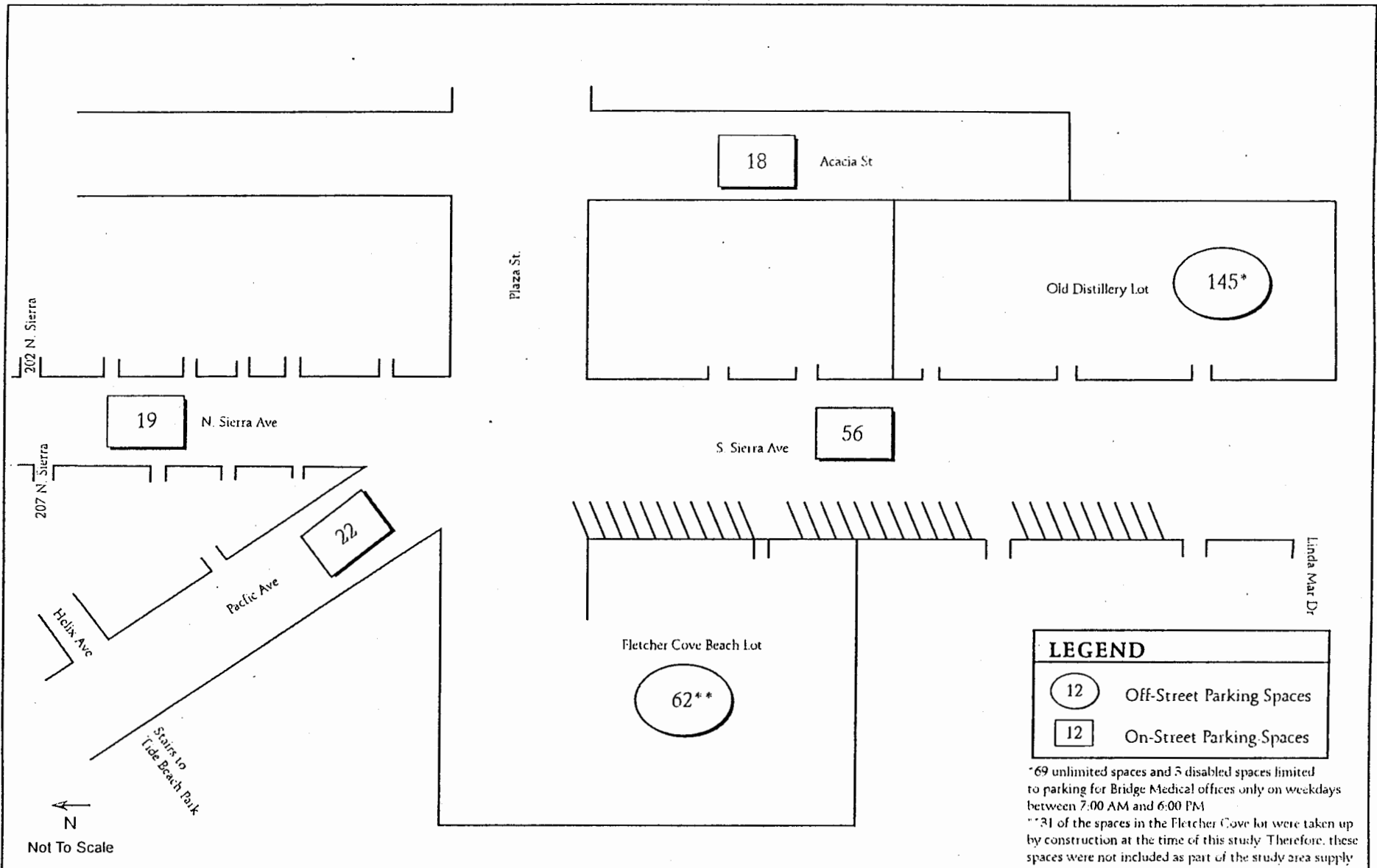
David Wong-Toi, P.E.
Senior Engineer



Katz, Okitsu & Associates
Planning & Engineering

ATTACHMENT A

FIGURES



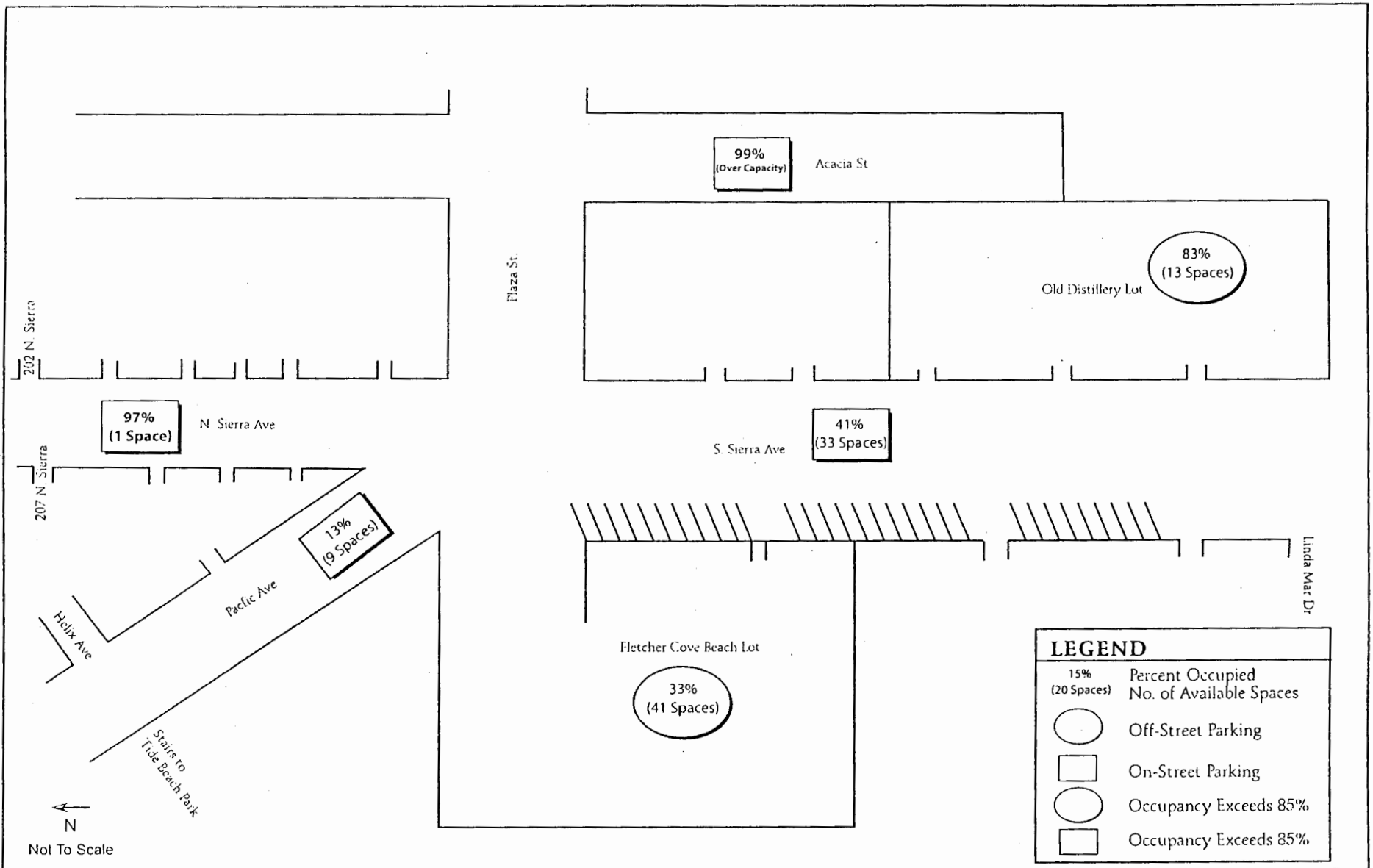
March 2005
JA4376

Study Area



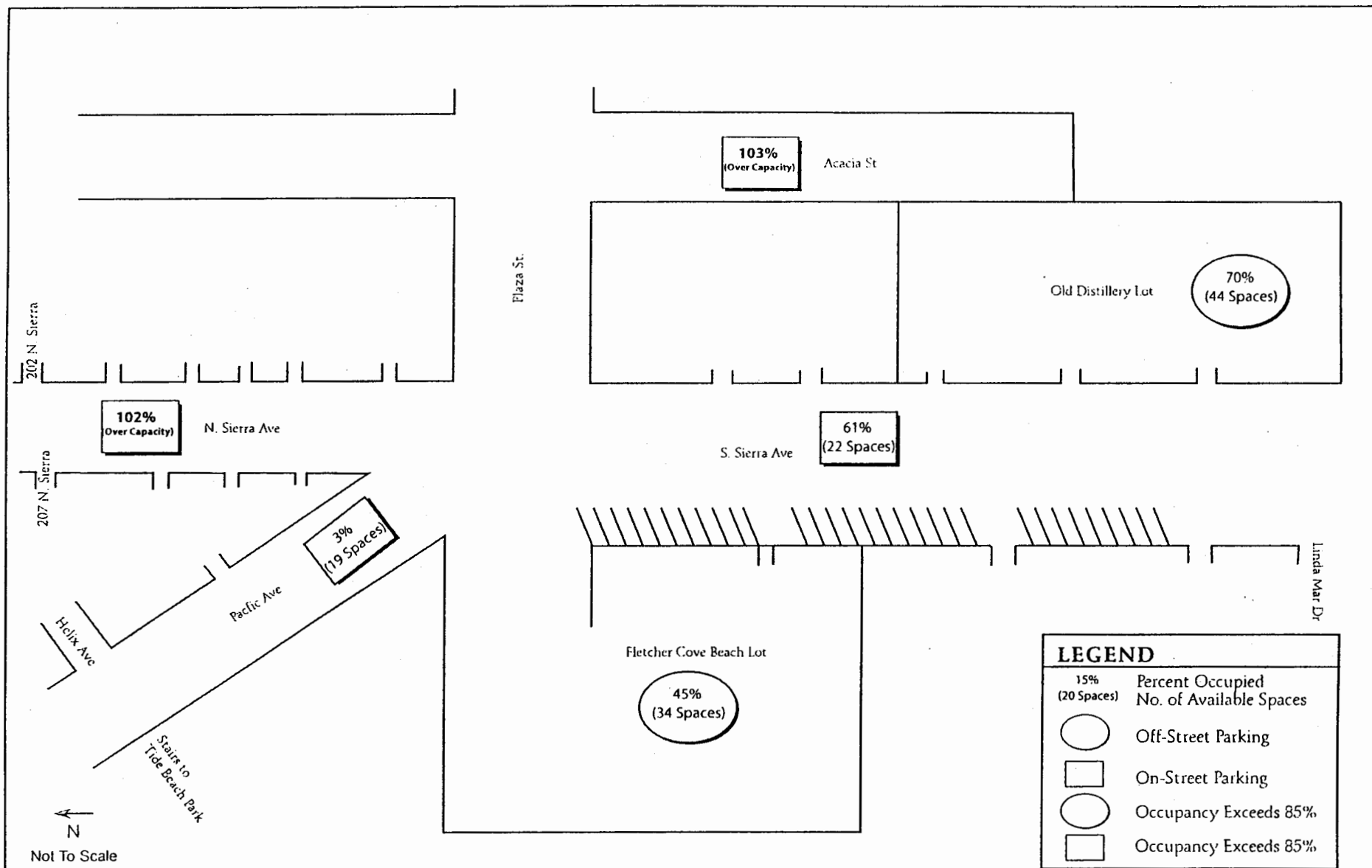
Katz, Okitsu & Associates

Fletcher Cove Parking Study



Average Weekday Parking Occupancy

March 2005
JA43/6



March 2005
1A43/6

Average Weekend Parking Occupancy



Katz, Okitsu & Associates

Fletcher Cove Parking Study



Katz, Okitsu & Associates
Planning & Engineering

ATTACHMENT B

ADJUSTMENT FACTOR REFERENCES



Katz, Okitsu & Associates
Planning & Engineering

Shared Parking. ULI-the Urban Land Institute. Washington, D.C. 1983.

City of San Diego Visitor Oriented Parking Facilities Study of the Pacific Beach Community. Wilbur Smith Associates. San Diego, CA. 2002.

Transportation Technical Report for Santa Cruz Recreational Rail Service. Dowling Associates, Inc. Oakland, CA. 2004.

Machine Count Traffic Volumes – City Streets. City of San Diego. San Diego, CA. 1996 to 2004.

2002 City of Solana Beach City-Wide Speed Surveys Report. Katz, Okitsu & Associates. San Diego, CA. 2002.

Machine Count Traffic Volumes – City Streets. City of Solana Beach. Solana Beach, CA. 2002.



Katz, Okitsu & Associates
Planning & Engineering

ATTACHMENT C
DAILY COUNT DATA

Parking Count Adjusted Data

Old Distillery Lot

		7:00 AM	8:00 AM	9:00 AM	10:00 AM	11:00 AM	12:00 PM	1:00 PM	2:00 PM	3:00 PM	4:00 PM	5:00 PM	6:00 PM
Weekday*	2/24/2005	16	31	50	62	59	51	53	49	49	37	22	13
	3/1/2005	21	32	44	61	62	70	58	58	57	48	39	23
Weekend	2/26/2005	39	82	89	104	106	110	97	59	70	49	41	21
	2/27/2005	21	31	51	76	96	83	69	47	33	24	14	9

*Publicly available spaces only

Fletcher Cove Beach Lot

		7:00 AM	8:00 AM	9:00 AM	10:00 AM	11:00 AM	12:00 PM	1:00 PM	2:00 PM	3:00 PM	4:00 PM	5:00 PM	6:00 PM
Weekday	2/24/2005	3	10	8	10	17	20	19	16	22	18	19	3
	3/1/2005	11	13	10	20	16	21	14	19	10	11	8	2
Weekend	2/26/2005	17	20	19	14	14	6	6	1	9	14	11	6
	2/27/2005	30	36	34	24	30	16	16	16	14	16	17	3

Pacific Avenue (Plaza St to Helix Ave)

		7:00 AM	8:00 AM	9:00 AM	10:00 AM	11:00 AM	12:00 PM	1:00 PM	2:00 PM	3:00 PM	4:00 PM	5:00 PM	6:00 PM
Weekday	2/24/2005	1	0	2	3	4	4	2	2	0	0	0	0
	3/1/2005	0	0	2	1	1	1	1	1	1	1	0	0
Weekend	2/26/2005	1	1	1	1	0	0	0	0	0	0	0	1
	2/27/2005	0	0	0	0	1	0	0	0	0	0	0	0

S. Acacia Street (S. of Plaza St)

		7:00 AM	8:00 AM	9:00 AM	10:00 AM	11:00 AM	12:00 PM	1:00 PM	2:00 PM	3:00 PM	4:00 PM	5:00 PM	6:00 PM
Weekday	2/24/2005	8	10	16	12	14	19	22	18	14	17	14	10
	3/1/2005	6	10	16	17	18	17	11	13	14	12	13	11
Weekend	2/26/2005	9	11	9	17	0	17	0	17	0	19	0	13
	2/27/2005	10	13	20	20	21	19	14	14	7	6	9	9

S. Sierra Avenue (Plaza St to Linda Mar Dr)

		7:00 AM	8:00 AM	9:00 AM	10:00 AM	11:00 AM	12:00 PM	1:00 PM	2:00 PM	3:00 PM	4:00 PM	5:00 PM	6:00 PM
Weekday	2/24/2005	2	6	10	18	21	30	23	20	17	19	11	6
	3/1/2005	2	4	10	14	21	16	18	12	16	17	9	1
Weekend	2/26/2005	0	3	10	30	44	26	21	9	7	9	4	4
	2/27/2005	1	3	13	26	24	24	21	21	11	11	7	4

N. Sierra Avenue (Plaza St to 202 N. Sierra Ave)

		7:00 AM	8:00 AM	9:00 AM	10:00 AM	11:00 AM	12:00 PM	1:00 PM	2:00 PM	3:00 PM	4:00 PM	5:00 PM	6:00 PM
Weekday	2/24/2005	20	16	17	20	21	21	20	19	19	19	16	14
	3/1/2005	16	13	13	12	10	10	17	14	12	11	11	9
Weekend	2/26/2005	20	20	19	20	24	17	14	11	13	11	14	14
	2/27/2005	17	14	16	13	14	13	16	19	21	20	20	23

Total Study Area

		7:00 AM	8:00 AM	9:00 AM	10:00 AM	11:00 AM	12:00 PM	1:00 PM	2:00 PM	3:00 PM	4:00 PM	5:00 PM	6:00 PM
Weekday	2/24/2005	50	72	103	125	137	146	140	123	121	109	82	46
	3/1/2005	56	73	95	125	128	134	119	118	110	100	80	47
Weekend	2/26/2005	86	137	146	187	189	176	139	97	99	102	72	60
	2/27/2005	80	97	134	159	187	154	136	117	87	77	67	47

Available Spaces

		7:00 AM	8:00 AM	9:00 AM	10:00 AM	11:00 AM	12:00 PM	1:00 PM	2:00 PM	3:00 PM	4:00 PM	5:00 PM	6:00 PM
Weekday	2/24/2005	200	178	147	125	113	104	110	127	129	142	168	204
	3/1/2005	195	177	155	125	122	116	131	132	140	150	170	203
Weekend	2/26/2005	236	185	176	135	133	146	183	225	223	220	251	262
	2/27/2005	242	225	188	163	135	168	186	205	235	245	255	275

JUN 0 1 2005

CALIFORNIA
COASTAL COMMISSION
SAN DIEGO COAST DISTRICT

~~Wed 8d~~

CalBeach Advocates and San Diego County Chapter of the Surfrider Foundation



Jim Jaffee
738 Seabright Lane
Solana Beach, CA 92075
858 350-0895

May 31, 2005

Comments on Application No. 6-05-40 (Fletcher Cove parking lots) Application of City of Solana Beach to redevelop beachfront park resulting in loss of 60 public parking spaces and construct 74-space off-site parking lot, at 140 South Sierra Avenue and Fletcher Cove Beach Park, Solana Beach, San Diego County.

CalBeach Advocates' mission is to preserve, maintain and restore the natural sandy beaches, coastal bluffs and nearshore environment of California.

The Surfrider Foundation is a non-profit environmental organization dedicated to the protection and enjoyment of the world's oceans, waves and beaches for all people, through conservation, activism, research and education. The San Diego County Chapter is the largest chapter and represents 4000 members.

This letter was also supported by San Diego Chapter of the Sierra Club (Contact Joanne Pearson 858-459-7041) and the San Diego Baykeeper (Contact Allison Rolfe, Policy Director, (619) 758-7743).

CalBeach Advocates and the San Diego County Chapter of the Surfrider Foundation have reviewed the referenced Staff Report and public comments and offer the following comments. However, before providing the specific comments, I personally, along with many members of Surfrider Foundation and CalBeach Advocates attended the numerous public workshops and Solana Beach City Council hearings held in developing the plans for improving Fletcher Cove and agreed with most of the actions taken, especially those with respect to expanding the park area as in the present application.

We respectfully disagree with staff's recommendation to "*deny the applicant's request for construction of a grass and/or sand park area within Fletcher Cove Beach Park because it will result in the permanent loss of 60 out of the existing 93 beach parking spaces at the only beachfront parking lot in Solana Beach*" for numerous reasons.

One is that, as correctly stated in the Staff report, there are limited opportunities for the public to enjoy the shoreline in Solana Beach. Private development covers virtually the entire top of the bluff, impeding lateral public access and leaving only a handful of public access points for bluff top ocean views. The usable sandy beach itself has narrowed, impeding lateral public beach access, because of decreased sand supplies. The beach will narrow further due to the unmitigated, cumulative passive erosion impacts of the present policy of approving sea walls along the entire Solana Beach coastline.

Fletcher Cove Beach Park is the only large, publicly-owned area in Solana Beach where public use and enjoyment of the bluff top along the shoreline could be enhanced. Currently, however, the Park has only a very small area available for safe and convenient public use at the top of the bluff. The proposed expansion of the usable park into a portion of the area now devoted to automobiles will significantly improve the ability of the public to use and enjoy the shoreline in Solana Beach.

This is similar to what happened in Del Mar when Powerhouse Park was created. A huge, dirt area next to the beach, historically used for beachfront parking, was replaced with grassy open space and children's play areas. Powerhouse Park now provides an immensely popular area for

Jim Jaffee

5/31/2005

LETTERS OF SUPPORT

members of the public to enjoy Del Mar's shoreline. Public use of the area increased dramatically, especially by non-residents, in spite of parking constraints.

Like staff, we are concerned about loss of public parking opportunities, as this is a critically important component of ensuring public access to the shoreline. We don't disagree with staff that the parking will not be as good or convenient as currently exists. We do disagree, however, with staff's conclusion that public use of the Park will decrease as a result.

First, we believe that the on-site parking spaces which will be retained will be sufficient for most weekday, off-season needs. Also, adequate beach parking need not be "beachfront" parking. There are numerous examples in the area where the public walks to the beach from nearby parking similar to what will exist with the new project. These include Del Mar, "D" St in Encinitas, Beacon's Beach in Leucadia, Black's Beach in La Jolla, Ponto Beach in Carlsbad, and day use of beaches in San Elijo State Park. In the case of Solana Beach, additional public parking exists along nearby streets and in the "Distillery" lot across the street from Fletcher Cove. Also, the completion of two new pedestrian bridges crossing the railroad right-of-way will help by facilitating pedestrian beach access from the residential areas to the east of old Highway 101. Improvement of Fletcher Cove Park should also attract more use by non-residents using the nearby Coaster station instead of vehicles.

We feel the Staff's application of Coastal Act Policies could also be viewed slightly differently in light of Section 30007.5 of the Coastal Act:

"30007.5. The Legislature further finds and recognizes that conflicts may occur between one or more policies of the division. The Legislature therefore declares that in carrying out the provisions of this division such conflicts be resolved in a manner which on balance is the most protective of significant coastal resources."

Expansion and improvement of the only beachfront and bluff top pedestrian park with easy access in Solana Beach is, in our view, a wiser and more protective use of significant coastal resources than maintenance of on-site, beachfront parking.

We recommend that the Commission approve the project as submitted using findings based on Section 30007.5 and in light of all of the direct community involvement in Solana Beach's formulation of the Fletcher Cove Master Plan.

Sincerely,



Jim Jaffee
Vice President
CalBeach Advocates
Advisor San Diego County Chapter of the Surfrider Foundation

On behalf of:

Joanne Pearson
San Diego County Chapter of the Sierra Club

Allison Rolfe
Policy Director, San Diego Baykeeper

~~Wed 8d~~

Steve, Mona and David Goetsch
837 Santa Rosita
Solana Beach, CA 92075

May 31, 2005

Gary Cannon
California Coastal Commission
7575 Metropolitan Drive
San Diego, CA 92108-4402

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JUN 01 2005

CALIFORNIA
COASTAL COMMISSION
SAN DIEGO COAST DISTRICT

RE: Fletcher Cove in City of Solana Beach

Dear Mr. Cannon:

I am a member of the City of Solana Beach Parks and Recreation Commission. My opinions represent myself but are not the expressed opinion of the Commission as a whole.

The Solana Beach Parks and Recreation Commission has begun to deal with the paucity of public parks in our community. The City of Solana Beach has an area of approximately 2176 acres and our only developed park (La Colonia) is merely 3 acres. That corresponds to 0.2% of the land area of our city. According to The Trust for Public Land, this compares abysmally with such cities as San Diego (18.3%), Los Angeles (10%), Long Beach (8.5%) and even the worst city on their list, Tucson (2.0%). It is clear that the County of San Diego short-changed the residents of this area during their stewardship and at the time of our incorporation as a city in 1986 there was very little left that city government could do in a community that is over 98% developed.

The proposal to trade parking spaces at Fletcher Cove, the jewel of our city, for a remote lot purchased by the city, in order to create more parkland is brilliant. It is virtually impossible to create more parkland in this city: even the Coastal Rail Trail serves as a pseudo-park, despite its ludicrous dimensions of 1.7 miles in length and 15 to 20 feet in width.

I strongly urge you to approve this proposal for creation of more park space. I cannot imagine any disadvantage to this proposal. Please visit Fletcher Cove this coming weekend during our Fiesta del Sol and see what the potential for a park at this site is really all about.

Steven J. Goetsch

Mr. Gary Cannon
California Coastal Commission
7575 Metropolitan Drive, Suite 103
San Diego, CA 92108
Email: gcannon@coastal.ca.gov
Fax: (619) 767-2384

RECEIVED

JUN 02 2005

CALIFORNIA
COASTAL COMMISSION
SAN DIEGO COAST DISTRICT

Cc: Mr. Barry Johnson, City of Solana Beach
Email: bjohnson@cosb.org
Fax: (858) 792-6513

RE: Coastal Commission agenda item "d. Application No. 6-05-40"

June 2, 2005

Dear Mr. Cannon,

I strongly support Coastal Commission approval of the City of Solana Beach application to redevelop a portion of the Fletcher Cove parking area into a beachfront park.

Fletcher Cove itself offers a very small beach area—in fact, almost none at high tide. A grassy park space adjacent to the beach would provide residents with a greatly needed recreation area. We need a place for families to play, to picnic or just to enjoy the beauty of the ocean view.

The city's purchase of the Distillery property and the resulting 124 public parking places it has provided, more than make up for the 60 public parking spaces which would be lost at Fletcher Cove.

Thank you for your consideration.

Sincerely,

Annette Fargo

Annette Fargo
652 Marsolan Ave
Solana Beach CA 92075

*The parking spaces in
question are seldom used.
go by there on any given day and
you will see the lot always
less than 50% occupied*

AF

RECEIVED

JUN 02 2005

CALIFORNIA
COASTAL COMMISSION
SAN DIEGO COAST DISTRICT

Mr. Gary Cannon
California Coastal Commission
7575 Metropolitan Drive, Suite 103
San Diego, CA 92108
Email: gcannon@coastal.ca.gov
Fax: (619) 767-2384

Cc: Mr. Barry Johnson, City of Solana Beach
Email: bjohnson@cosb.org
Fax: (858) 792-6513

RE: Coastal Commission agenda item "d. Application No. 6-05-40"

June 2, 2005

Dear Mr. Cannon,

I/We strongly support Coastal Commission approval of the City of Solana Beach application to redevelop a portion of the Fletcher Cove parking area into a beachfront park.

Fletcher Cove itself offers a very small beach area—in fact, almost none at high tide. A grassy park space adjacent to the beach would provide residents with a greatly needed recreation area. We need a place for families to play, to picnic or just to enjoy the beauty of the ocean view.

The city's purchase of the Distillery property and the resulting 124 public parking places it has provided, more than make up for the 60 public parking spaces which would be lost at Fletcher Cove.

Thank you for your consideration.

Sincerely,



Parker and Megan Lyons
1416 San Ignacio
Solana Beach, CA 92075

From: Brenda Sampiere [brendasampiere@cox.net]
Sent: Thursday, June 02, 2005 9:22 AM
To: gcannon@coastal.ca.gov
Cc: bjohnson@cosb.org
Subject: Solana Beach Fletcher Cove Parking

RECEIVED
JUN 02 2005

CALIFORNIA
COASTAL COMMISSION
SAN DIEGO COAST DISTRICT

Gary,

I am writing with reference to Application No. 6-05-40. As a long time citizen of Solana Beach (12 years) and with the intent of staying another 20 years or so, and a resident on N. Sierra Ave., about .2 miles from Fletcher Cove, I urge you and your commission to look very closely at Solana Beach's request for swapping parking from Fletcher Cove to the old distillery lot. I lived here when the purchase took place and the buildings were leveled for parking. I was a member of the Parks and Recreation Commission and fought hard to make Fletcher Cove Master Plan a reality. Fletcher Cove could be *sooooo* amazing and yet it is just an ugly patch of lawn enjoyed by very few.

The new bathrooms are beautiful and the rest of the plan would make Fletcher Cove available to be enjoyed by so many more residents if there were grass, a playground and more areas to look at and enjoy our beautiful ocean.

I strongly urge you to allow the swap of parking as it was intended and don't penalize our town for doing things one step at a time.

Sincerely,

Brenda Sampiere

6/2/2005

From: Christine Antonelli [chris@mind-spire.com]
Sent: Wednesday, June 01, 2005 10:04 PM
To: gcannon@coastal.ca.gov
Cc: bjohnson@cosb.org
Subject: Fletcher Cove, Solana Beach

Dear Mr. Cannon,

On behalf of the Coastal Commission, please consider and approve Application No. 6-05-40 (Fletcher Cove parking lots) Application of City of Solana Beach to redevelop beachfront park resulting in loss of 60 public parking spaces and construct 74-space off-site parking lot, at 140 South Sierra Avenue and Fletcher Cove Beach Park, Solana Beach, San Diego County. (GDC-SD).

Our family has resided in Solana Beach for over 15 years, and we are eager for the proposed improvements to Fletcher Cove to progress as planned. As you know, there is ample parking across the street in the lot the City purchased in anticipation of the Fletcher Cove improvement plan. We have already been waiting an interminable amount of time. A new and improved Fletcher Cove will be an asset to the City of Solana Beach, San Diego and North County as a whole.

Thank you in advance for your thoughtful consideration of this matter.

Sincerely,
Christine Antonelli
Joseph Crocamo
Casey Crocamo
Michael Crocamo
Cameron Crocamo

212 N. Sierra Ave
Solana Beach, CA 92075

6/2/2005

From: Julie Doody [jdoody@adelphia.net]
Sent: Thursday, June 02, 2005 3:18 PM
To: gcannon@coastal.ca.gov
Cc: bjohnson@cosb.org
Subject: Fletcher Cove

RECEIVED
JUN 02 2005

CALIFORNIA
COASTAL COMMISSION
SAN DIEGO COAST DISTRICT

Dear Sirs – please read and consider the following matter.

Mr. Gary Cannon
California Coastal Commission
7575 Metropolitan Dr., Ste 103
San Diego, Ca 92108

Cc: Mr. Barry Johnson, City of Solana Beach

RE: Coastal Commission agenda item “d. Application No. 6—5-40”

June 2, 2005

Dear Mr. Cannon,

I strongly support Coastal Commission approval of the City of Solana Beach application to redevelop a portion of the Fletcher Cove parking area into a beachfront park.

Fletcher Cove itself offers a VERY small beach area – in fact, almost none at high tides. A grassy park space adjacent to the beach would improve residents with a greatly needed recreation area. We need a place for families to come together to play, picnic or enjoy the beautiful ocean view and sunsets.

The city’s purchase of the Distillery property and the resulting 124 public parking places it has provided more than make up for the 60 public parking spaces which would be lost at Fletcher Cove.

Thank you for your consideration in the matter.

Sincerely,

Julie Doody
730 South Nardo Avenue
Solana Beach, Ca 92075

6/2/2005

From: Kristan Fazio [lusk@adelphia.net]
Sent: Thursday, June 02, 2005 2:35 PM
To: bjohnson@cosb.org
Cc: gcannon@coastal.ca.gov
Subject: Fletcher Cove

Mr. Gary Cannon
California Coastal Commission
7575 Metropolitan Drive, Suite 103
San Diego, CA 92108
Email: gcannon@coastal.ca.gov
Fax: (619) 767-2384

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JUN 02 2005

CALIFORNIA
COASTAL COMMISSION
SAN DIEGO COAST DISTRICT

Cc: Mr. Barry Johnson, City of Solana Beach
Email: bjohnson@cosb.org
Fax: (858) 792-6513

RE: Coastal Commission agenda item "d. Application No. 6-05-40"

June 2, 2005

Dear Mr. Cannon,

We strongly support Coastal Commission approval of the City of Solana Beach application to redevelop a portion of the Fletcher Cove parking area into a beachfront park.

Fletcher Cove itself offers a very small beach area—in fact, almost none at high tide. A grassy park space adjacent to the beach would provide residents with a greatly needed recreation area. We need a place for families to play, to picnic or just to enjoy the beauty of the ocean view.

The city's purchase of the Distillery property and the resulting 124 public parking places it has provided, more than make up for the 60 public parking spaces which would be lost at Fletcher Cove.

Thank you for your consideration.

Sincerely,

Kristan Fazio
The Fazio Family
412 S. Rios Ave
Solana Beach, Ca 92075

6/2/2005

From: Durbin, Terri [terri.durbin@intel.com]
Sent: Thursday, June 02, 2005 11:28 AM
To: gcannon@coastal.ca.gov
Cc: bjohnson@cosb.org
Subject: Support for Fletcher Cove, Solana Beach Redevelopment

RECEIVED

JUN 02 2005

CALIFORNIA
COASTAL COMMISSION
SAN DIEGO COAST DISTRICT

Mr. Gary Cannon
California Coastal Commission
7575 Metropolitan Drive, Suite 103
San Diego, CA 92108
Email: gcannon@coastal.ca.gov
Fax: (619) 767-2384

Cc: Mr. Barry Johnson, City of Solana Beach
Email: bjohnson@cosb.org
Fax: (858) 792-6513

RE: Coastal Commission agenda item "d. Application No. 6-05-40"

June 2, 2005

Dear Mr. Cannon,

We strongly support Coastal Commission approval of the City of Solana Beach application to redevelop a portion of the Fletcher Cove parking area into a beachfront park.

Fletcher Cove itself offers a very small beach area—in fact, almost none at high tide. A grassy park space adjacent to the beach would provide residents with a greatly needed recreation area. We need a place for families to play, to picnic or just to enjoy the beauty of the ocean view.

The city's purchase of the Distillery property and the resulting 124 public parking places it has provided, more than make up for the 60 public parking spaces which would be lost at Fletcher Cove.

Thank you for your consideration.

Sincerely,

Terri and Dennis Durbin
711 Marsolan Avenue
Solana Beach, Ca. 92075

6/2/2005

From: Victoria Cypherd [v.cypherd@cox.net]
Sent: Thursday, June 02, 2005 10:39 AM
To: gcannon@coastal.ca.gov
Subject: Application No. 6-05-40

RECEIVED
JUN 02 2005
CALIFORNIA
COASTAL COMMISSION
SAN DIEGO COAST DISTRICT

**Coastal Commssion Agenda Item d. Application No. 6-05-40 (Fletcher Cove parking lots)
Application of City of Solana Beach to redevelop beachfront park resulting in loss of 60
public parking spaces and construct 74-space off-site parking lot, at 140 South Sierra
Avenue and Fletcher Cove Beach Park, Solana Beach, San Diego County. (GDC-SD)**

Dear Mr. Cannon,

I live in the neighborhood that will be directly affected by the loss of parking at Fletcher Cove. I would like to see the park development proceed and I don't believe we will be severely impacted by the loss of parking spaces at the Cove.

The City bought the Distillery night club in order to provide for parking when the park at Fletcher Cove was developed. That time has come - just because the parking lot has been used by the public in the mean time for other purposes shouldn't mean that it can't be used for it's original purpose - to make up for the spaces that will be lost when developing the park. The Distillery parking lot is adjacent to Fletcher Cove and more than makes up for the lost parking spaces at the Cove. There is already street parking available and many beach cities currently exist with the influx of beach goers. I don't think any of us who live at the beach realize that there won't be some traffic impacts.

Our City will greatly benefit from the proposed park development. The current parking lot at Fletcher Cove is very unattractive and the addition of a park on the bluff will enhance the beach experience for everyone, especially for children, since our beach is narrow and often inaccessible due to high tides.

I hope you will consider approving the City's application.

Sincerely,

Victoria Cypherd

207 N. Acacia Avenue

6/2/2005

From: Dan Chambers [dan@biotechnologylawgroup.com]
Sent: Thursday, June 02, 2005 1:52 PM
To: gcannon@coastal.ca.gov
Cc: bjohnson@cosb.org
Subject: Application No. 6-05-40 - Fletcher Cove in Solana Beach, CA

Importance: High

RECEIVED
JUN 02 2005

CALIFORNIA
COASTAL COMMISSION
SAN DIEGO COAST DISTRICT

Dear Mr. Cannon:

Dan Chambers here. I reside at 658 Marsolan Avenue, Solana Beach, CA 92075-1931, with my wife, Marcel, and our 17 mo. old daughter, Camille. I am writing to ask that the California Coastal Commission approve Solana Beach's proposed revitalization of a portion of the small beachfront park known as "Fletcher Cove". I note the following in support of this request:

1. Implementation of the City's proposed plan (Application No. 6-05-40) will revitalize and expand the recreational area at Fletcher Cove. Specifically, expansion of the park's recreational area, including the addition of a "tot-lot" and larger grassy area, will allow for better use of the scenic bluff property than the current park parking lot, 60 spaces of which (out of a current total of 93) would be redeveloped as recreational space, although these lost spaces would be more than replaced by the 124 parking spaces on City-owned property across the street that Solana Beach has already purchased and improved for this purpose.
2. Fletcher Cove's expansion will allow for increased coastal access for the public (including for families such as mine that include small children); access to and use Fletcher Cove during high tide, which at present frequently renders much of the beach inaccessible; and beautification and redevelopment of the site in general.
3. Even after redevelopment, I understand that Fletcher Cove will retain 33 parking spaces, including those reserved for the handicapped.
4. In 1994 the City purchased a property known as the "Distillery" located across the street from Fletcher Cove specifically to provide replacement parking after proposed redevelopment of the park, which will result in the conversion of some of Fletcher Cove's existing parking into useful recreational space. In the interim, the City has demolished the building on the Distillery lot and re-striped its parking lot to provide 124 free public parking spaces.
5. I understand that Coastal Commission's staff recommends that the City's application be denied, largely, if not entirely, based on the perception that the proposed redevelopment will result in the loss of 60 parking spaces at Fletcher Cove. This view fails to recognize the City's good faith actions over more than 10 years with respect to the Distillery lot's 124 parking spaces (which, after the redevelopment is complete, will result in a net gain of at least 64 parking spaces) and would, in effect, penalize the City for being proactive and allowing the public to use the Distillery lot's parking spaces in advance of receiving the Coastal Commission's approval for the park's redevelopment. A ruling against the City's application for this reason (i.e., "loss" of parking spaces) would constitute a ridiculous "form over substance" decision, based on an overly technical, unnecessarily restrictive approach to adjudication. It would also serve as notice to cities that they should refrain from undertaking publicly beneficial interim steps (e.g., addition of parking spaces on city-owned property) in connection with a long-term redevelopment effort still subject to Coastal Commission review.

Accordingly, I urge the Commission to reject its staff's recommendation and

instead vote to approve Solana Beach's application to redevelop a portion of the Fletcher Cove parking area into a beachfront park (8 June 2005 Hearing agenda item (d) - Application No. 6-05-40). Doing so would recognize the City's long-term efforts to substantially improve Fletcher Cove's recreational potential and enable the City to convert Fletcher Cove's tiny existing beach area, which can become almost totally submerged at high tide, into a much-needed family-friendly, recreational space that also includes a non-tide-affected beach-adjacent grassy area and space for small children to safely play. It would also appropriately recognize that this long-term redevelopment effort will result in a net gain, not loss, of parking spaces for Fletcher Cove visitors.

Thank you for your consideration.

Sincerely,
Dan Chambers
Daniel M. Chambers
BioTechnology Law Group
658 Marsolan Avenue
Solana Beach, CA 92075-1931
Tel: 858.350.9690
Fax: 858.350.9691
E-mail: dan@biotechnologylawgroup.com

IMPORTANT - This message, and any attachment, is confidential, and is intended solely for the named recipient(s). Unauthorized access, use, reproduction, or retransmission is prohibited. If you are not an intended recipient or have otherwise received this message in error, please immediately notify the sender and delete this message from your computer system. Thank you.

RECEIVED

JUN 02 2005

CALIFORNIA
COASTAL COMMISSION
SAN DIEGO COAST DISTRICT

Mr. Gary Cannon, California Coastal Commission
Email: gcannon@coastal.ca.gov
Fax number: (619) 767-2384

Cc: Mr. Barry Johnson, City of Solana Beach
Email: bjohnson@cosb.org
Fax: (858) 792-6513

RE: Coastal Commission agenda item d. Application No. 6-05-40

Dear Mr. Cannon,

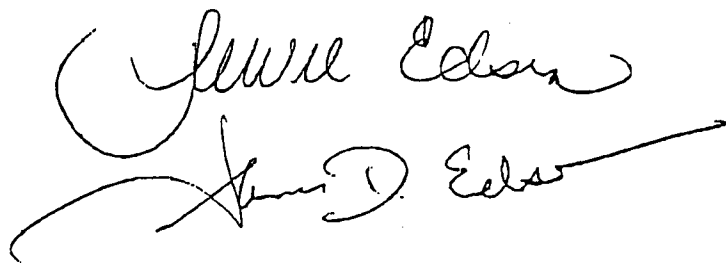
We strongly support Coastal Commission approval of the City of Solana Beach application to redevelop a portion of the Fletcher Cove parking area into a beachfront park.

Fletcher Cove itself offers a very small beach area—in fact, almost none at high tide. A grassy park space adjacent to the beach would provide residents with a greatly needed recreation area. We need a place for families to play, to picnic or just to enjoy the beauty of the ocean view.

The city's purchase of the Distillery property and the resulting 124 public parking places it has provided, more than make up for the 60 public parking spaces which would be lost at Fletcher Cove.

Thank you for your consideration.

Sincerely,



6/1/05

6/1/05

710 Marsoler Avenue
Solana Beach, CA 92075

Mr. Gary Cannon
California Coastal Commission
7575 Metropolitan Drive, Suite 103
San Diego, CA 92108
Email: gcannon@coastal.ca.gov
Fax: (619) 767-2384

RECEIVED

JUN - 3 2005

CALIFORNIA
COASTAL COMMISSION
SAN DIEGO COAST DISTRICT

Cc: Mr. Barry Johnson, City of Solana Beach
Email: bjohnson@cosb.org
Fax: (858) 792-6513

RE: Coastal Commission agenda item "d. Application No. 6-05-40"

June 2, 2005

Dear Mr. Cannon,

We strongly support Coastal Commission approval of the City of Solana Beach application to redevelop a portion of the Fletcher Cove parking area into a beachfront park.

Fletcher Cove itself offers a very small beach area—in fact, almost none at high tide. A grassy park space adjacent to the beach would provide residents with a greatly needed recreation area. We need a place for families to play, to picnic or just to enjoy the beauty of the ocean view.

The city's purchase of the Distillery property and the resulting 124 public parking places it has provided, more than make up for the 60 public parking spaces which would be lost at Fletcher Cove.

Thank you for your consideration.

Sincerely,

Mary and Mike Larkin
726 Barbara Ave
Solana Beach, CA 92075
(858)259-0698

RECEIVED

JUN 03 2005

June 2, 2005

Application No. 6-05-40

Attention: Gary Cannon

CALIFORNIA
COASTAL COMMISSION
SAN DIEGO COAST DISTRICT

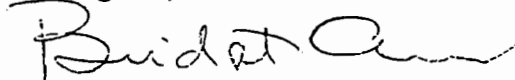
To Whom It May Concern:

I live in the Fletcher Cove area and have for over 18 years. I have been waiting for the park to go in for several years now. The park will allow me to enjoy the beach without worry of bluff failure on my loved ones while still enjoying the wonderful ocean. I remember when the city of Solana Beach purchased the Distillery, demolished the structure and turned it into a parking area. The people in my neighborhood were ecstatic! Finally the City seemed to be moving forward with its plan of more parks in the community. A neighborhood park for children to play at, a place for our community to gather! I have not heard any concern about parking. We feel the parking spaces the old Distillery lot provides is more than sufficient parking. The Distillery has 124 spaces while Fletcher Cove would only be giving up 60! The off set seems more than ample.

I am also a member of the Parks and Recreation Committee in the City and have volunteered my time in that position for over 6 years. Many of the members on the Committee feel it will be a wonderful park to gather our community and bring them together for coastal recreation. We are currently planning a "Surf Movie" family night at the Fletcher Cove location. Families in our community will be encouraged to attend a free outdoor screening of a surf film while enjoying the beautiful ocean and all it has to offer. We are hoping to host "Family Night" events on a regular basis at Fletcher Cove. The area as it is now is difficult to gather the community at and we are limited in what we can achieve. With more open space it would be a much more user friendly area for people to enjoy and the community to gather at.

We are a coastal town and would love to gather at the coast but sadly it seems that option is limited. With that addition of more open space at Fletcher Cove our community could once again enjoy the beautiful ocean and all of its gift! Thank you for your time in letting me express my whole hearted support of the Fletcher Cove project and opening up coastal access for our community to once again enjoy!

Best regards,



Bridget Augusta

122 N. Helix Ave 1987-1996

120 N. Helix Ave 1996-2001

616 W. Circle Drive 2001- present

From: Jennifer Ball [freerangechickens@adelphia.net]
Sent: Friday, June 03, 2005 6:45 AM
To: gcannon@coastal.ca.gov
Cc: bjohnson@cosb.org; gerri retman; Gillian Gillies
Subject: Fletcher cove park

RECEIVED

JUN - 3 2005

CALIFORNIA
COASTAL COMMISSION
SAN DIEGO COAST DISTRICT

Here we have a city that rightly chooses grass over asphalt, and the Coastal Commission is telling us that we can't have grass right next to the ocean? Because we need more parking spaces???? Please don't force us to have concrete when we'd prefer something else. We are intelligent, thoughtful people. We know that we have plenty of parking for out-of-towners. The rest of us walk and bike and run to the beach. We don't need parking for ourselves, just visitors. I think we, as a town, have the right to make this decision. I thought the Coastal Commission was for protecting the coast and its inhabitants. Having exhaust right by the ocean kind of diminishes what people come to the ocean for: clean air, freedom from traffic, and open space.

Please, please, please don't force us to have asphalt when we'd rather have nature.

Sincerely,

Jennifer Ball
709 N. Granados Ave.
738 Barbara Ave.
Solana Beach, CA 92075
858-350-7670

From: Kelly Harless [kharless@cox.net]
Sent: Thursday, June 02, 2005 6:54 PM
To: gcannon@coastal.ca.gov; bjohnson@cosb.org
Subject: RE: Coastal Commission agenda item "d. Application No. 6-05-40"

RECEIVED

RE: Coastal Commission agenda item "d. Application No. 6-05-40"

JUN - 3 2005

June 2, 2005

CALIFORNIA
COASTAL COMMISSION
SAN DIEGO COAST DISTRICT

Dear Mr. Cannon,

We strongly support Coastal Commission approval of the City of Solana Beach application to redevelop a portion of the Fletcher Cove parking area into a beachfront park.

Fletcher Cove itself offers a very small beach area—in fact, almost none at high tide. A grassy park space adjacent to the beach would provide residents with a greatly needed recreation area. We need a place for families to play, to picnic or just to enjoy the beauty of the ocean view.

The city's purchase of the Distillery property and the resulting 124 public parking places it has provided, more than make up for the 60 public parking spaces which would be lost at Fletcher Cove.

Thank you for your consideration.

Sincerely,

From: Jane Coffin [edtyus@msn.com]
Sent: Friday, June 03, 2005 10:46 AM
To: gcannon@coastal.ca.gov
Cc: bjohnson@cosb.org

RECEIVED

JUN 03 2005

CALIFORNIA
COASTAL COMMISSION
SAN DIEGO COAST DISTRICT

Mr. Gary Cannon
California Coastal Commission
7575 Metropolitan Drive, Suite 103
San Diego, CA 92108
Email: gcannon@coastal.ca.gov
Fax: (619) 767-2384

Cc: Mr. Barry Johnson, City of Solana Beach
Email: bjohnson@cosb.org
Fax: (858) 792-6513

RE: Coastal Commission agenda item "d. Application No. 6-05-40"

June 2, 2005

Dear Mr. Cannon,

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Thank you for your consideration.

Sincerely,

Jane Coffin
109 Brookdale Place
Solana Beach, CA 92075

From: Michael Luther [mluther@qualcomm.com]
Sent: Friday, June 03, 2005 11:54 AM
To: gcannon@coastal.ca.gov
Subject: Re: Application No. 6-05-40

Mr Cannon,

Please approve The City of Solana Beach's request for a permit to transform the parking lot at Fletcher Cove into a recreation and tot-lot area.

Being a Solana Beach resident and using the Cove a couple times a week for the last 4 years I can honestly say that I have never seen a situation where the parking lot was more than half full. The proposed increase in recreational area at Fletcher Cove will make better use of the scenic bluff property, and the adjacent Distillery parking, which historically has never really been used by Visitors to the Cove, should be viewed as an expansion to offset any loss of parking places at the Cove itself.

The proposed enlargement of the park will offer better opportunities for coastal recreation for families with children like mine. The beach is often inaccessible due to high tides, and the new park will allow visitors to more frequently utilize the coastal area.

The families and residents of Solana Beach want you to approve this project. I am asking you to approve the project on our behalf.

Thanks for your consideration.

Michael Luther
701 Midori Ct.
Solana Beach, CA 92075
(858) 792-0952

RECEIVED
JUN 03 2005
CALIFORNIA
COASTAL COMMISSION
SAN DIEGO COAST DISTRICT

Mr. Gary Cannon
California Coastal Commission
7575 Metropolitan Drive, Suite 103
San Diego, CA 92108
Email: gcannon@coastal.ca.gov
Fax: (619) 767-2384

RECEIVED

JUN 03 2005

CALIFORNIA
COASTAL COMMISSION
SAN DIEGO COAST DISTRICT

Cc: Mr. Barry Johnson, City of Solana Beach
Email: bjohnson@cosb.org
Fax: (858) 792-6513

RE: Coastal Commission agenda item "d. Application No. 6-05-40"

June 2, 2005

Dear Mr. Cannon,

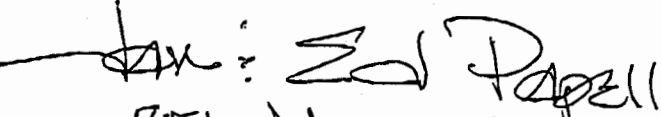
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Thank you for your consideration.

Sincerely,

 Jeff Papell
756 MARJOLAN AVENUE
SOLANA BEACH, CA. 92075
EMAIL: JEPAPELL@ADELPHIA.NET
FAX: 858 509 1794.

Wed 8d

Gary Cannon

From: GJones692@aol.com
Sent: Friday, June 03, 2005 6:40 PM
To: gcannon@coastal.ca.gov
Cc: bjohnson@cosb.org; gerriretman@oppersports.com
Subject: SB appliction to CC No. 6-05-40

RECEIVED

JUN 03 2005

CALIFORNIA
COASTAL COMMISSION
SAN DIEGO COAST DISTRICT

My wife Gloria and I are attracted to the ocean. Fletcher Cove provides the only easy access. We have Colonel Ed Fletcher to thank for this. Years ago he bulldozed a portion of the cliffs with the sole purpose to provide access to the beach for everyone. The CC now objects to a plan by the City of SB that would create more openness by eliminating 60 parking spaces. We are talking about an area to be enjoyed by all. Whether or not the CC is hide bound to a ratio of parking spots in no way should it trump the inherent right of us to happiness. In 1994 SB Council provided for what is now 124 parking spots at the old Distillery lot which is half a block from the cove area that we are talking about. Fletcher Cove is the closest thing to being the center of town. We're a hearty bunch, we can walk half a block. I refuse to believe that parking ratios are more important than people's enjoyment as envisioned by Colonel Ed Fletcher!

Judge (ret.) George M. Jones (858) 793-0050. 701 Santa Olivia, Solana Beach, CA. 92075

Gary Cannon

From: Gillian Gillies [gillianbg@adelphia.net]
Sent: Sunday, June 05, 2005 8:53 AM
To: gcannon@coastal.ca.gov
Cc: Gerri Retman; amy horne
Subject: Grass not concrete at Fletcher Cove, Solana Beach

RECEIVED

JUN 03 2005

CALIFORNIA
COASTAL COMMISSION
SAN DIEGO COAST DISTRICT

Dear Gary Cannon,

We would rather have a beach park than a parking lot for me and my family. Our family enjoys walks to the beach. However because of high tide and the cliff walls the beach is very small. A park would allow us a place to gather, play and enjoy the coast and its views at any time of the day. Solana Beach is a pedestrian friendly community. With the Linear Park, we have created an easy and beautiful pathway for visitors and residents to visit our small beach at the Cove. There is plenty of parking across the street at the old Distillery which was bought with this purpose in mind. Please support the residents of Solana Beach with our desire for a park at the Cove.

Sincerely,
Gillian Gillies
Solana Beach CA

Gary Cannon

From: amyhorne@sbcglobal.net
Sent: Sunday, June 05, 2005 4:10 PM
To: gcannon@coastal.ca.gov
Cc: bjohnson@cosb.org
Subject: Application No. 6-05-40

RECEIVED

JUN 03 2005

CALIFORNIA
COASTAL COMMISSION
SAN DIEGO COAST DISTRICT

Dear Mr. Cannon,

We would rather have a beach park than a parking lot for the enjoyment of our family and other local residents. Our family enjoys the beach. However because of high tide and the cliff walls the beach is very small. A new park will allow visitors to utilize the coastal area during high tide conditions. A park would allow us a place to gather, play and enjoy the coast and its views at any time of the day. Solana Beach is a pedestrian friendly community. With the Linear Park, we have created an easy and beautiful pathway for visitors and residents to visit our small beach at the Cove. There is plenty of parking across the street at the old Distillery which was bought with this purpose in mind.

Please support the residents of Solana Beach with our desire for a park at the Cove.

Sincerely,
Amy Horne
734 Avocado Ct.
Del Mar, 92014

(address is Del Mar, but we actually live in Solana Beach! And we think of our selves as very much a part of the Solana Beach community!)

RECEIVED

MAY 26 2005

CALIFORNIA
COASTAL COMMISSION
SAN DIEGO COAST DISTRICT

Wed 8d

CALIFORNIA COASTAL COMM.
SAN DIEGO DISTRICT

WED. 8d

RE: PERMIT NO 6-05-040

DEAR COMMISSIONERS:

THE TAKING OF 60 PARKING SPACES AT FLETCHER COVE IS A CONSIDERABLE AMOUNT. I FEEL IT REASONABLE TO DESIGNATE 20 OF THE SPACES THAT ARE LEFT TO PEOPLE WITH SURF BOARDS (SURFERS ONLY). PEOPLE WITH SURF BOARDS SHOULD NOT HAVE TO USE THE PARKING LOT ACROSS FROM THE POST OFFICE.

SIERRA IS A HEAVILY TRAVELED STREET WITH CARS COMING AT A CONSTANT CLIP ALL DAY.

THERE IS CERTAIN TO BE A CONFRONTATION IF NOT AN ACCIDENT WITH SURFERS TRYING TO CROSS THIS STREET WITH A SURF BOARD. PLEASE GIVE US CONSIDERATION

Paul E. [Signature]

LETTER OF CONCERN

Wed 8d

5/31/05

MR. GARY CANNON
COASTAL COMMISSION
SAN DIEGO COAST DISTRICT OFFICE

103-

JUN - 1 2005

CALIFORNIA
COASTAL COMMISSION
SAN DIEGO COAST DISTRICT

RE: PROPOSED LOSS OF 60
PARKING SPACES, FLETCHER COVE
SOLANA BEACH, CALIF.

DEAR COASTAL COMMISSION MEMBERS:

AS A 25 YR. RESIDENT OF SOLANA BEACH, I AM WRITING TO YOU REGARDING
THE CITY OF SOLANA BEACH'S APPLICATION TO ELIMINATE 60 PARKING SPACES
AT FLETCHER COVE TO CONVERT TO A PARK.

THOUSANDS OF BEACH GOERS, VISITORS, BY CYCLE RIDERS WALKERS USE THIS PARKING
LOT THROUGHOUT THE YEAR ADJACENT TO FLETCHER COVE TO PARK. MOST
COASTAL CITIES WOULD KILL TO HAVE ADJACENT PARKING TO A BEACH.
PARKING IS PRECIOUS ANYWHERE TODAY, IT IS LUDICRUS TO ELIMINATE
IT.

SOLANA BEACH HAS AN EXISTING PARK, BUT WE HAVE A SMALL POWERFUL GROUP
IN THIS CITY WHO ARE BOUND AND DETERMINED TO HAVE THEIR OWN
TOTTLOT AND PARK AT THE EXPENSE OF ALL THE CURRENT EXISTING USERS
OF THE PARKING LOT

THE CITY IS COUNTERING WITH A PARKING LOT SOUTH OF THE COVE FOR
PARKING TO COMPENSATE FOR THIS LOSS OF PARKING SPACES. I RECOMMEND
THAT ON ANY GIVEN WEEK DAY CHECK OUT THIS LOT AND YOU MIGHT FIND
5-8 SPACES AVAILABLE. EMPLOYEES FROM ADJACENT BUSINESSES USE IT,
POST OFFICE PATRONS USE IT, COASTAL TRAIN RIDERS USE IT AND THE COVE
LOT WILL BE FULL ON A SUMMER DAY AT THE SAME TIME.

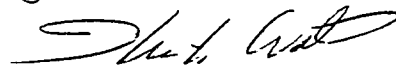
I HAVE FOUND 50% OF THE PEOPLE I HAVE TALKED TO ABOUT THIS
PROJECT DO NOT KNOW ANY THING ABOUT THE LOSS OF PARKING AND
THE PROPOSED PARK.

YOUR STAFF IS TOTALLY CORRECT IN RECOMMENDING A DENIAL FOR
THE PARK AND LOSS OF PARKING SPACES FOR THE PUBLIC!

PLEASE DENY THIS APPLICATION FROM THE CITY OF SOLANA BEACH
AND PROTECT THE PUBLIC FROM THIS PARKING LOSS.

Thank you.

SINCERELY



THOMAS L WALTERS
519 N GRANADOS AVE
SOLANA BEACH, CALIF 92075
858-481-1647

LETTER OF OPPOSITION

