CALIFORNIA COASTAL COMMISSION
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Staff Report:	1/19/17
Hearing Date:	2/9/17

STAFF REPORT: REGULAR CALENDAR

Application No.:	**6-16-0733**
Applicant:	**Solana Beach School District**
Agent:	Christine Casimier
Location:	606 Lomas Santa Fe Drive, Solana Beach, San Diego County (APN 263-421-18)
Project Description:	Demolition of existing elementary school campus and reconstruction of a new campus consisting of a 2-story academic building/administrative area/media center/library, a 1-story kindergarten building, a 1-story multipurpose building with a food service area and attached lunch shelter, new pick-up/drop-off areas, new parking lots, new hardscaping, new landscaping, and a new outdoor amphitheater on an approximately 10-acre lot.
Staff Recommendation:	Approval with Conditions

SUMMARY OF STAFF RECOMMENDATION

The Solana Beach School District proposes to demolish and reconstruct the Skyline Elementary School campus in the City of Solana Beach. The purpose of the proposed project is to upgrade the existing campus, originally built between 1955-1961, in its existing location. The primary Coastal Act issues raised by this project relate to water quality, biological resources, public access to the coast, and visual resources.

The subject site is approximately ¾ mile from the coast and located on the north side of Lomas Santa Fe Drive, which is a major coastal access route (Exhibit 1). The applicant is

proposing to demolish and rebuild the entire campus, which currently consists of four academic buildings, an administrative and media center building, a multi-purpose building, the existing food service area, the covered lunch shelter, six portable buildings, in addition to existing turf, pavement, parking lots, and drop-off areas. The new campus will consist of a 1-story kindergarten building, a 1-story multipurpose building that will include a food service area and an attached, covered lunch shelter, a 2-story academic building that will house 1st-6th grade classrooms, an administrative area, a library/media center, new parking lots with solar canopies, a new pick-up/drop-off area, a new security perimeter fence, new landscaping, new natural turf play field, and a new outdoor amphitheater (Exhibit 3). The campus will be shut down for the duration of construction activities, which are anticipated to occur between June 2017 – August 2018. Students will be accommodated at the Carmel Creek Elementary School, which is located in the City of San Diego outside of the Coastal Zone, and at temporary classrooms placed at Earl Warren Middle School, which is less than 0.2 miles south of the subject site.

The potential for impacts to water quality issues arise because the applicant is proposing balanced grading and an increase in impervious surface area. To ensure the protection of water quality both during and post-construction, **Special Conditions No. 3** and **No. 4** require the applicant to submit a Water Quality Technical Report for Post-Development Water Quality Protection and a Construction Pollution Prevention Plan, respectively.

The applicant is proposing to remove 85 existing, mature, non-native trees throughout the campus, and plant 163 new, non-native trees throughout the campus. To avoid potential impacts to breeding activities of sensitive bird species during the nesting season, **Special Condition No. 6** requires a qualified biologist to conduct a survey for active nests no more than 72 hours prior to any tree removal. **Special Condition No. 2** requires final landscape plans that use drought-tolerant, native or non-invasive species.

The proposed project has the capacity to increase student enrollment, which could, in turn, impede public access if traffic were to increase significantly. However, a traffic study determined that the proposed project would not adversely impact traffic or circulation, even if Skyline were to operate at its maximum capacity of 720 students. Temporarily shifting some students to the Earl Warren school campus just south of the project site should not have any impact on public access to the shoreline, particularly because the applicant is proposing staggered bell schedules to eliminate congestion during peak AM and PM hours. **Special Condition No. 5** requires a written commitment between Earl Warren Middle School and Skyline Elementary School, which indicates that both parties have agreed to the use of temporary buildings on the Earl Warren Middle School campus for Skyline students during the campus construction.

One of the new, proposed buildings is increasing from a 1-story to a 2-story building. However, there are no public views that will be impacted by the increased height of this one building. **Special Condition No. 1** requires the submittal of final plans to ensure that they are in conformance with the proposed plans.

As conditioned, the proposed development will not have any adverse impacts on coastal resources and meets the standards set forth in the Coastal Act and the City of Solana

Beach's certified Land Use Plan. Therefore, Commission staff recommends **approval** of coastal development permit application #6-16-0733, as conditioned.

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APPENDICES

EXHIBITS

I. MOTION AND RESOLUTION

Motion:

*I move that the Commission **approve** Coastal Development Permit Application No. 6-16-0733 subject to the conditions set forth in the staff recommendation.*

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

Resolution:

The Commission hereby approves coastal development permit 6-16-0733 and adopts the findings set forth below on grounds that the development as conditioned will be in conformity with the policies of Chapter 3 of the Coastal Act and will not prejudice the ability of the local government having jurisdiction over the area to prepare a Local Coastal Program conforming to the provisions of Chapter 3. Approval of the permit complies with the California Environmental Quality Act because either 1) feasible mitigation measures and/or alternatives have been incorporated to substantially lessen any significant adverse effects of the development on the environment, or 2) there are no further feasible mitigation measures or alternatives that would substantially lessen any significant adverse impacts of the development on the environment.

II. STANDARD CONDITIONS

This permit is granted subject to the following standard conditions:

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

This permit is granted subject to the following special conditions:

1. **Final Plans.** PRIOR TO THE ISSUANCE OF THIS COASTAL DEVELOPMENT PERMIT, the applicant shall submit to the Executive Director for review and written approval final project plans that are in substantial conformance with the preliminary plans submitted by Davy Architecture dated 8/18/2016 and 9/30/2016.

The permittee shall undertake the 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 a Coastal Commission approved amendment to this coastal development permit unless the Executive Director determines that no amendment is legally required.

2. **Final Landscape Plans**. PRIOR TO THE ISSUANCE OF THIS COASTAL DEVELOPMENT PERMIT, the applicant shall submit to the Executive Director for review and written approval, final landscape plans for the proposed development. Said plans shall be in substantial conformance with the landscape plans submitted by Omega Engineering on 9/30/2016 and Davy Architecture on 11/29/2016, and shall include the following:

(a) Vegetated landscaped areas shall consist of native plants or non-native drought tolerant plants, which are non-invasive. No plant species listed as problematic and/or invasive by the California Native Plant Society (http://www.CNPS.org/), the California Invasive Plant Council (formerly the California Exotic Pest Plant Council) (http://www.cal-ipc.org/), or as may be identified from time to time by the State of California shall be employed or allowed to naturalize or persist on the site. No plant species listed as a "noxious weed" by the State of California or the U.S. Federal Government shall be utilized within the property. All plants shall be low water use plants as identified by California Department of Water Resources (See: http://www.water.ca.gov/wateruseefficiency/docs/wucols00.pdf).

(b) Use of reclaimed water for irrigation is encouraged. If using potable water for irrigation, only drip or microspray irrigation systems may be used. Other

water conservation measures shall be considered, such as weather based irrigation controllers.

The permittee shall undertake the 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 a Coastal Commission approved amendment to this coastal development permit unless the Executive Director determines that no amendment is legally required.

3. **Water Quality Technical Report for Post-Development Water Quality Protection.** PRIOR TO ISSUANCE OF THIS COASTAL DEVELOPMENT PERMIT, the applicant shall submit for the review and written approval of the Executive Director a final Water Quality Technical Report (WQTR) for post-development water quality protection.

(a) The final WQTR shall demonstrate that the project:

i. Minimizes disturbance of coastal waters and natural drainage features; minimizes removal of native vegetation; and avoids, to the extent feasible, covering or compaction of highly permeable soils.

ii. Preferentially uses Low Impact Development (LID) techniques to retain and disperse runoff on site.

iii. Retains runoffs to the greatest possible extent and minimizes the addition of impervious surfaces. Where infiltration is not appropriate or feasible, uses alternative BMPs to minimize changes in the runoff flow regime (e.g., proprietary modular wetlands, cobble bioswales with engineered filter media).

iv. Directs drainage from all parking areas and driveways, roofs, walkways, patios, and other impervious surfaces to, in order of priority, a) landscaped areas or open spaces capable of infiltration, b) earthen-based infiltration BMPs, c) flow-through biofiltration BMPs designed to treat, at a minimum, twice the 85th percentile one-hour storm event volume, accompanied by supporting calculations, d) proprietary filtration systems designed to treat, at a minimum, twice the 85th percentile one-hour storm event volume, accompanied by supporting calculations and product documentation.

v. Conveys excess runoff off-site in a non-erosive manner.

vi. Where flow-through BMPs are used, includes supporting calculations and product documentation.

vii. Includes all maintenance and operating procedures that will be conducted to keep the water quality provisions effective for the life of the development.

(b) The final WQTR shall be prepared by a qualified licensed professional and shall include:

i. Maps, drawn to scale, showing the property boundaries, highway footprint, runoff flow directions, relevant drainage and water quality features, impervious surfaces, permeable pavements, and landscaped areas.

ii. Maps showing the site's Drainage Management Areas, and calculations of the runoff volumes from these areas.

iii. Supporting information demonstrating the effectiveness of the BMPs to treat the pollutants anticipated to be present after development occurs.

iv. Supporting calculations demonstrating that flow-based Treatment Control BMPs are designed to treat, at a minimum, twice the 85th percentile one-hour storm event volume. Documentation shall be included for proprietary Treatment Control BMPs that demonstrates treatment of the 85th percentile runoff event, at a minimum.

v. An alternatives analysis that demonstrates that no feasible alternative project design would substantially lessen any significant adverse impacts on the environment.

The permittee shall undertake development in accordance with the final Water Quality Technical Report (WQTR). Any proposed changes to the approved plan shall be reported to the Executive Director. No changes to the plan shall occur without a Coastal Commission approved amendment to this coastal development permit unless the Executive Director determines that no amendment is legally required.

4. **Construction Pollution Prevention Plan (CPPP),** PRIOR TO ISSUANCE OF THIS COASTAL DEVELOPMENT PERMIT, the applicant shall submit for the review and approval of the Executive Director, a Construction Pollution Prevention Plan (CPPP) prepared and signed by a licensed engineer. To comply with the California State Water Resources Control Board (SWRCB) stormwater permit requirements, an applicant may be required to develop and implement a Stormwater Pollution Prevention Plan (SWPPP) that addresses construction activities. Applicable information provided in the SWPPP may also be included as part of the CPPP.

(a) At a minimum, the CPPP shall demonstrate that the development complies with the following requirements:

i. During construction, development shall minimize site runoff and erosion through the use of temporary BMPs, and shall minimize the discharge of sediment and other potential pollutants resulting from

construction activities (e.g., chemicals, vehicle fluids, petroleum products, cement, debris, and trash).

ii. Development shall minimize land disturbance during construction (e.g., clearing, grading, and cut-and-fill) and shall phase grading activities to avoid increased erosion and sedimentation. Development shall minimize soil compaction due to construction activities to retain the natural stormwater infiltration capacity of the soil.

iii. Development shall minimize the damage or removal of non-invasive vegetation (including trees, native vegetation, and root structures) during construction, to achieve water quality benefits such as transpiration, vegetative interception, pollutant uptake, shading of waterways, and erosion control.

iv. Development shall implement soil stabilization BMPs (such as mulching, soil binders, erosion control blankets, or temporary re-seeding) on graded or disturbed areas as soon as feasible during construction, where there is a potential for soil erosion to lead to discharge of sediment off-site or to coastal waters.

v. During construction, development shall avoid the use of erosion and sediment control products (such as mulch/compost, fiber rolls, erosion control blankets, mulch control netting, and silt fences) that incorporate recycled plastic or plastic netting (such as polypropylene, nylon, polyethylene polyester, or other synthetic fibers), in order to minimize wildlife entanglement and plastic debris pollution.

vi. Development shall implement additional BMPs for construction taking place over, in, or adjacent to coastal waters, if there is a potential for construction chemicals or materials to enter coastal waters. BMPs shall include, where applicable:

A. Tarps to capture debris and spills. Use tarps or other devices to capture debris, dust, oil, grease, rust, dirt, fine particles, and spills to protect the quality of coastal waters.

B. BMPs for preservative-treated wood. If preservative-treated wood is used, implement appropriate BMPs that meet standards for treatment, storage, and construction practices for preservative-treated wood; at a minimum, those standards identified by the American Wood Protection Association.

vii. Conduct fueling and maintenance of construction equipment and vehicles off site if feasible. Any fueling and maintenance of mobile equipment conducted on site shall take place at a designated area located at least 50 feet from coastal waters, drainage courses, and storm drain inlets, if feasible (unless these inlets are blocked to protect

against fuel spills). The fueling and maintenance area shall be designed to fully contain any spills of fuel, oil, or other contaminants. Equipment that cannot be feasibly relocated to a designated fueling and maintenance area (such as cranes) may be fueled and maintained in other areas of the site, provided that procedures are implemented to fully contain any potential spills.

(b) The Construction Pollution Prevention Plan shall include a construction site map and a narrative description addressing, at a minimum, the following required components:

i. A map delineating the construction site, construction phasing boundaries, and the location of all temporary construction-phase BMPs (such as silt fences, inlet protection, and sediment basins).

ii. BMPs that will be implemented to minimize land disturbance activities, the project footprint, soil compaction, and damage or removal of non-invasive vegetation.

iii. BMPs that will be used to identify, and remove or isolate soils, containing aerially deposited lead.

iv. BMPs that will be implemented to minimize erosion and sedimentation during construction activities, including:

A. BMPs that will be implemented to stabilize soil during construction.

B. BMPs that will be implemented to control erosion and sedimentation during construction.

C. A schedule for installation and removal of temporary erosion and sedimentation control BMPs, and identification of temporary BMPs that will be converted to permanent post-development BMPs.

D. BMPs that will be implemented to minimize polluted runoff from stockpiling soil and other excavated materials.

E. A construction phasing schedule, if applicable to the project, with a description and timeline of significant land disturbance activities.

(c) BMPs that will be implemented to minimize the discharge of other pollutants resulting from construction activities (such as paints, solvents, vehicle fluids, asphalt and cement compounds, trash, and debris) into runoff or coastal waters, including:

i. BMPs that will be implemented to minimize polluted runoff from staging, storage, and disposal of construction chemicals and materials.

ii. Site management "good housekeeping" BMPs that will be implemented during construction, such as maintaining an inventory of products and chemicals used on site, and having a written plan for the clean-up of spills and leaks.

(d) BMPs that will be implemented, if needed, to either infiltrate runoff or treat it prior to conveyance off-site during construction.

(e) A schedule for the inspection and maintenance of construction-phase BMPs, including temporary erosion and sedimentation control BMPs, as needed to ensure that the Coastal Development Permit's water quality requirements are met.

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 a Commission approved amendment to this Coastal Development Permit unless the Executive Director determines that no amendment is legally required.

5. **Written Agreement Between Skyline Elementary School and Earl Warren Middle School.** PRIOR TO PRIOR TO ISSUANCE OF THIS COASTAL DEVELOPMENT PERMIT**,** the applicant shall submit for the review and written approval of the Executive Director, a written commitment between Skyline Elementary School and Earl Warren Middle School indicating their agreement to the use of temporary buildings on the Earl Warren Middle School campus and staggered bell schedules while the temporary buildings are in use. The use of said temporary buildings is contingent upon Earl Warren Middle School obtaining Coastal Commission approval to amend CDP #6-14-1897. Once construction is completed, all temporary buildings will be removed from the Earl Warren Middle School campus. No changes to the plans shall occur without a Commission-approved amendment to this permit, unless the Executive Director determines that no such amendment is legally required.

6. **Sensitive Species Survey**. PRIOR TO COMMENCEMENT OF ANY CONSTRUCTION ACTIVITIES**,** during bird nesting season (February 1st through September 15th), a qualified biologist shall conduct a site survey for active nests no more than 72 hours prior to any development. If an active nest of a special-status species or species protected by the federal Migratory Bird Treaty Act (MBTA) or the California Fish and Game Code is located, then a qualified biologist shall monitor the nest daily until project activities are no longer occurring within a distance of the nest appropriate to the sensitivity of the species, and determined in consultation with the California Department of Fish and Wildlife (typically 300 feet for most species, up to 500 feet for raptors), or until the young have fledged and are independent of the adults or the nest is otherwise abandoned. Limits of construction around active nests shall be established in

the field with flagging, fencing, or other appropriate barriers and construction personnel shall be instructed on the sensitivity of nest areas. The monitoring biologist shall halt construction activities if he or she determines that the construction activities may be disturbing or disrupting the nesting activities. The monitoring biologist shall make practicable recommendations to reduce the noise or disturbance in the vicinity of the active nests or birds. This may include recommendations such as turning off vehicle engines and other equipment whenever possible to reduce noise, working in other areas until the young have fledged, or utilizing alternative construction methods and technologies to reduce the noise of construction machinery. The monitoring biologist shall review and verify compliance with these avoidance boundaries and shall verify that the nesting effort has finished in a written report. Unrestricted construction activities may not resume until the biologist confirms no active nests are found.

IV. FINDINGS AND DECLARATIONS

A. PROJECT DESCRIPTION

The project site is located in the City of Solana Beach adjacent to the north side of Lomas Santa Fe Drive, approximately ¼ mile west of Interstate 5 and ¾ mile east of the coast (Exhibit 1). The proposed project is for the demolition and construction of Skyline Elementary School, which currently consists of four 1-story academic buildings, one administrative and media center building, one multi-purpose building, the food service area and covered lunch shelter, six portable buildings, as well as the existing turf and pavement.

New construction will consist of one 2-story academic building that will house all 1^{st} – 6^{th} grade classrooms, an administrative area and a library/media center, a 1-story kindergarten building, a 1-story multi-purpose building that will include a food service area and attached, covered lunch shelter, a new pick-up/drop-off area, 151 new parking spaces, a new outdoor amphitheater, a new security perimeter fence, as well as new landscaping, hardscaping and a turf play field (Exhibit 3). The applicant has stated that purpose of the project is to create a modern, sustainable campus as the existing campus was originally built in 1955 and is outdated.

Also proposed is the removal of 85 non-native trees. Construction of the proposed project would be completed in one phase over 14 months, with an anticipated start date in June 2017 and an anticipated end date in August 2018. During construction, approximately 330 students from Skyline Elementary will attend Earl Warren Middle School, which is located less than 0.2 miles south of the subject site, and approximately 180 students from Skyline Elementary will attend the Carmel Creek Elementary School, which is located in the City of San Diego outside of the Coastal Zone. All three schools would maintain their current bell schedules, which are staggered.

The City of Solana Beach has a certified Land Use Plan (LUP), which is used as guidance; however, the City has not yet completed, nor has the Commission reviewed,

any implementing ordinances. Thus, the City's LCP is not fully certified, and the standard of review for the proposed development is the Chapter 3 policies of the Coastal Act.

B. WATER QUALITY

Section 30231 of the Coastal Act states:

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

The City of Solana Beach's certified LUP states:

> Policy 3.81:
> *Design and manage development to avoid or minimize increases in stormwater runoff volume and peak runoff rate, and to avoid detrimental water quality impacts caused by excessive erosion or sedimentation.*

The applicant is proposing to demolish the existing Skyline Elementary School campus and construct a new campus within the approximately 10-acre lot. The expansion will result in an increase in the amount of impervious surface area from 125,285 sq. ft. to 164,569 sq. ft., and the amount of landscaping is decreasing from 224,109 sq. ft. to 198,791 sq. ft. The project also includes balanced grading, but does not include the import or export of any material. Nevertheless, the proposed grading and increase of impervious surface area could increase the amount of discharge and runoff from the site, and thus, has the potential to adversely impact coastal waters.

The Coastal Act mandates the protection of coastal water quality, and the applicant has submitted a Stormwater Quality Management Plan (SWQMP), which proposes numerous Best Management Practices (BMPs) to ensure such protection is achieved. Some of these BMPs include new storm drains, bioretention areas, and an infiltration trench to control and reduce stormwater flows, as well as routing stormwater to a system of treatment control devices to filter, treat, and detain stormwater prior to discharging it from the site. However the SWQMP has been reviewed by the Coastal Commission's technical staff, who found that some of the information was not yet included in the report but was intended to be filled in at a later date and that it did not cover water quality protection during the construction phase of the project.

To reconcile these deficiencies, staff is recommending **Special Condition No. 3** and **Special Condition No. 4**, which requires the applicant to submit a Water Quality

Technical Report for Post-Development Water Quality Protection and a Construction Pollution Prevention Plan, respectively. The incorporation of these requirements will ensure that runoff is controlled, erosion and sediment avoided, and the biological productivity and the quality of coastal waters maintained. Thus, as conditioned, the project can be found consistent with Section 30231 of the Coastal Act as well as the City of Solana Beach's LUP.

C. BIOLOGICAL RESOURCES

Section 30240 of the Coastal Act states:

> *(a) Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed within those areas.*
>
> *(b) Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade those areas, and shall be compatible with the continuance of those habitat and recreation areas.*

As a previously developed site, the project site does not have any environmentally sensitive habitat areas, and no native or sensitive plant communities. Although the project would remove 85 trees from the project site, none of these trees are listed as native, candidate, sensitive, or special status species and 18 of the existing trees are listed as invasive by the California Invasive Plant Society. However, removal of the existing, mature trees during nesting season does have the potential to adversely impact nesting birds. Thus, consistent with a requirement placed on the project by the Mitigated Negative Declaration prepared for the project, **Special Condition No. 6** requires a qualified biologist to survey for active bird nests prior to construction, demolition, or tree removal that is to occur during the nesting season. If active nests are observed, work shall avoid the avian species or active nests until the young have fledged or the nest is otherwise abandoned.

The applicant is also proposing to install 163 non-native trees throughout the campus, and thus, staff recommends **Special Condition No. 2**, which requires final landscape plans that use drought-tolerant, native or non-invasive species.

Therefore, as conditioned, the project conforms to Section 30240 of the Coastal Act and the certified LUP.

D. PUBLIC ACCESS & RECREATION

Section 30252 of the Coastal Act states in part:

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…

The City of Solana Beach's certified LUP also contains relevant policies:

Policy 5.16:
Off-street parking shall be provided for all new development in accordance with the policies of the LUP to assure there is adequate public access to coastal resources. A modification in the required parking standards through the variance process shall not be approved unless the City makes findings that the provision of fewer parking spaces will not result in adverse impacts to public access.

Policy 7.4:
Maintain a minimum Level of Service (LOS) C at all intersections during non-peak hours and LOS D (volume/capacity ratio of 0.90 or less) at all intersections during peak hours and LOS D for Interstate 5 as an element of the Regional Transportation Plan (RTP) to ensure that traffic delays are kept to a minimum.

Policy 7.7:
Provide an adequate supply of private off-street and public parking to meet the needs of residents and visitors to the City.

The proposed project will increase Skyline Elementary School's capacity to enroll additional students, which, in turn, has the potential to impact coastal access. As outlined above, Section 30252 of the Coastal Act requires that new development does not adversely impact public access to the coast.

There are currently 513 students enrolled at Skyline Elementary, but the school has the capacity to enroll 612 students. This project will increase the capacity of the school from 612 to 720 students. Skyline is anticipating an increase in enrollment from 513 to 574 students by the 2020-2021 school year. The Mitigated Negative Declaration (MND) prepared for this project includes a traffic study which indicates that if Skyline were to operate at its maximum capacity of 720 students, the City of Solana Beach's level-of-service requirements, as outlined in its certified LUP, would still be met. These level-of-service requirements are an element of the Regional Transportation Plan and set minimum standards for all intersections during peak and non-peak hours to ensure that traffic delays are minimized. Therefore, there are no expected impacts to coastal access due to traffic or circulation. Additionally, given that the most popular times to access the coast are in the summer and on weekends, which are times when school is either not in session or has an extremely reduced population, this project will not negatively impact coastal access either during or post-construction.

In terms of parking, no direct blockage or restriction of public access to the shoreline is anticipated because this site is not used for parking to access the coast. Further, the City of Solana Beach's certified Land Use Plan requires that educational institutions provide parking based on the following:

- 2 spaces for each classroom,
- 1 space for each 35 square feet of auditorium space, and
- 1 space for each 250 square feet of office space.

Given these numbers, Skyline is required to provide 147 parking spaces, and they are providing 151 spaces, consistent with the requirement.

The MND prepared for this project indicted that, during construction, the proposed project would generate approximately 660 daily trips during a typical weekday. However, on average, approximately 1,635 average daily trips are generated by existing students, teachers, and faculty on a weekday. Thus, no impacts to traffic and circulation are anticipated during construction. Furthermore, the active construction and staging areas would be on the campus and clearly marked with barriers to separate public access from the construction zone. The applicant is also proposing that prior to the start of the peak building construction phase, the Solana Beach School District shall have an approved construction traffic management plan on file with the District office that includes measures such as:

- Using off-site parking lots for construction workers in less congested areas, with shuttle service to/from the project site
- Adjust worker shift times to minimize their travel to/from the site during the peak commute hours
- Schedule all haul truck and materials/delivery trucks to arrive and leave the project site outside of the peak commute hours
- Encourage carpooling of construction workers to the site
- Provide maps to construction workers and truck drivers (materials/delivery and haul trucks) showing alternate regional routes to the project site such as the I-5/Via de la Valle ramps via Stevens Avenue or Coast Highway

During demolition and construction of the proposed project, the entire campus will be shut down. Approximately 180 students will be accommodated at Carmel Creek Elementary School, which is located within the City of San Diego outside of the Coastal Zone, and approximately 330 students will be accommodated at Earl Warren Middle School, which is located less than 0.2 miles south of the project site. Relocating the students to other areas during the construction period is not expected to increase traffic or adversely impact the ability of the public to access the shoreline. However, to ensure there are no impacts to traffic and circulation, both schools will implement staggered bell schedules, allowing for phased drop-off and pick-up times and eliminating congestion during peak AM and PM hours.

Though the Carmel Creek Elementary School facility has the capacity to absorb the students from Skyline Elementary School, Earl Warren Middle School does not. However, the Commission approved CDP #6-14-1897 in March 2015, which permitted Earl Warren Middle School to demolish and reconstruct its campus. CDP #6-14-1897

also included the construction of a temporary campus on the athletic fields, consisting of 31 classroom buildings, a food service building, a locker building, a multi-purpose room, an outdoor dining area, a hardcourt area, and a parking campus. The applicant has coordinated with Earl Warren Middle School and is proposing to utilize 18 of the temporary buildings (15 for classroom use, 1 for administrative use, and 2 restroom facilities) for the duration of the subject project, which is estimated to commence in June 2017 and last approximately 14 months. However, because CDP #6-14-1897 did not envision or approve the use of said temporary buildings beyond what was necessary for construction of the Earl Warren campus, continued use of these buildings for the subject project is contingent upon Earl Warren Middle School obtaining Coastal Commission approval to amend CDP #6-14-1897. After this project, the temporary buildings will be removed from the Earl Warren Middle School campus.

Special Condition No. 5 requires a written agreement between the Earl Warren Middle School and Skyline Elementary School implementing the staggered bell schedules and allowing the applicants to utilize the existing, temporary buildings on the Earl Warren Middle School campus for the duration of demolition and construction activities, as well as a coastal development permit amendment to CDP #6-14-1897.

As conditioned, the proposed development would minimize adverse impacts to public access and recreation, and thus, it is consistent with Section 30252 of the Coastal Act.

E. VISUAL RESOURCES

Section 30251 of the Coastal Act states, in part that:

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

The City of Solana Beach's certified LUP also contains relevant policies:

> Policy 6.4:
> *Locations along public roads, railways, trails, parklands, and beaches that offer views of scenic resources are considered public viewing areas. Existing public roads where there are major views of the ocean and other scenic resources are considered Scenic Roads and include:*
> - *Highway 101/Pacific Coast Highway and Railway Corridor*
> - *I-5*
> - *Lomas Santa Fe Drive*
>
> *Public views to scenic resources from Scenic Roads shall also be protected.*
>
> Policy 6.10:

New development shall be sited and designed to minimize adverse impacts on scenic resources visible from scenic roads or major public viewing areas. If there is no feasible building site location on the proposed project site where development would not be visible then the development shall be sited and designed to minimize impacts on scenic areas visible from Scenic Roads or major public viewing areas, through measures including, but not limited to, siting development in the least visible portion of the site, breaking up the mass of new structures, designing structures to blend into the natural hillside setting, restricting the building maximum size, reducing maximum height standards, clustering development, minimizing grading, incorporating landscape elements, and where appropriate berming.

The project site is located on Lomas Santa Fe Drive, a major coastal access corridor, and is approximately ¼ mile west of Interstate 5. Both Lomas Santa Fe Drive and I-5 are identified in the City of Solana Beach's LUP as Scenic Roads. The existing campus consists exclusively of 1-story buildings, and the proposed project includes the construction of a new, 2-story building. This building will reach 34 ft. 4 in. in height, and has the potential to impact visual and scenic resources.

The Coastal Act and the certified LUP require that the visual quality of the area is protected by siting and designing development to preserve views to and along the ocean and scenic coastal areas. It also requires that development is visually compatible with the character of the surrounding area.

Though one of the proposed buildings will be increasing from 1 story to 2 stories in height, the site is zoned Public Institutional, which allows for development up to 45 ft. in height. Though the subject site is relatively close to the coast, there are no public coastal views across the subject site, and the site is not visible from Lomas Santa Fe Drive or Interstate 5. The site is also not within any designated view corridors or Scenic Overlay Zones in the City of Solana Beach Land Use Plan. The proposed 2-story building is consistent with the surrounding area, is developed with public and institutional uses, commercial uses, and residential development, which includes many 2-story buildings. Therefore, the proposed project would not have any adverse impacts to public views or community character. **Special Condition No. 1** requires the applicant to submit final plans consistent with the proposed plans to ensure that visual resources are protected. Thus, as conditioned, the Commission finds that the project conforms to Section 30251 of the Coastal Act.

F. LOCAL COASTAL PLANNING

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

The Commission approved and certified the City of Solana Beach Local Coastal Program Land Use Plan (LUP); however, the City has not yet completed, nor has the Commission reviewed, any implementing ordinances. Thus, the City's LCP is not fully certified.

Therefore, Chapter 3 of the Coastal Act remains the legal standard of review with the City's certified LUP used as guidance.

The subject site is designated as Public Institutional in the City of Solana Beach LUP. The proposed project will retain the existing land use as an elementary school campus which is consistent with the Public Institutional land use designation. The site is not located within any of the special overlay zones contained in the LUP. As conditioned, the proposed development is consistent with all applicable Chapter 3 policies of the Coastal Act and the City's LUP. Therefore, 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 certifiable LCP.

G. CALIFORNIA ENVIRONMENTAL QUALITY ACT

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 Solana Beach School District prepared a Mitigated Negative Declaration to evaluate the potential environmental consequences associated with the project and found that a biological survey for nesting bird activity, water quality Best Management Practices, and demolition and construction mitigation measures were necessary to minimize potential adverse impacts to water quality, biological resources, and public access.

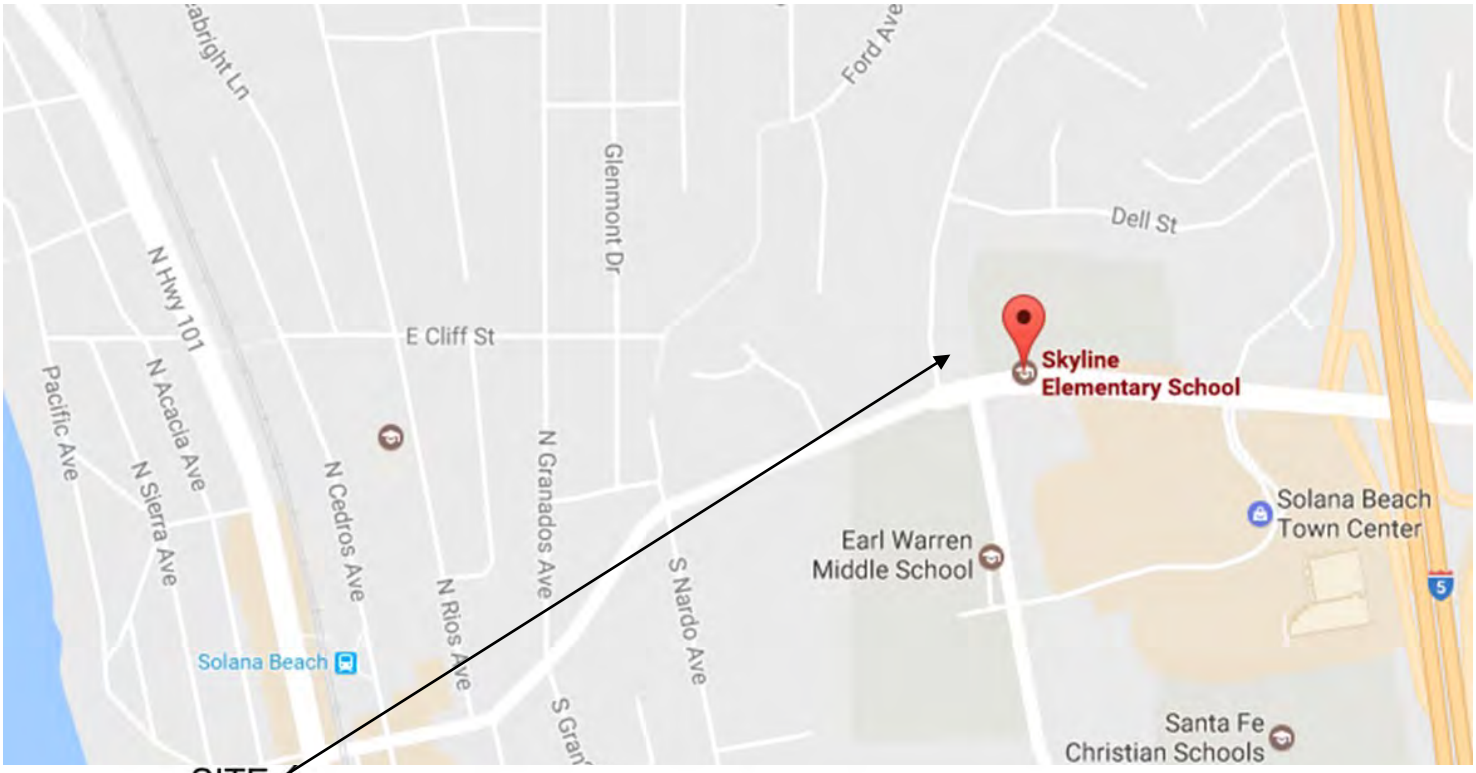
The proposed project has been conditioned in order to be found consistent with the Chapter 3 policies of the Coastal Act. Mitigation measures, including special conditions addressing potential impacts to water quality, public access/traffic/circulation, visual resources, and biological resources, will minimize all adverse impacts to coastal resources. 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 can be found consistent with the requirements of the Coastal Act to conform to CEQA.

(G:\San Diego\Reports\2016\6-16-0733 Skyline Elementary Demo & Rebuild Stf Rpt.docx)

APPENDIX A – SUBSTANTIVE FILE DOCUMENTS

- City of Solana Beach's certified Land Use Plan
- Mitigated Negative Declaration and Initial Study – Skyline Elementary School Reconstruction dated November 2016 by Solana Beach School District
- CDP #6-14-1897 San Dieguito Union High School District

VICINITY MAP



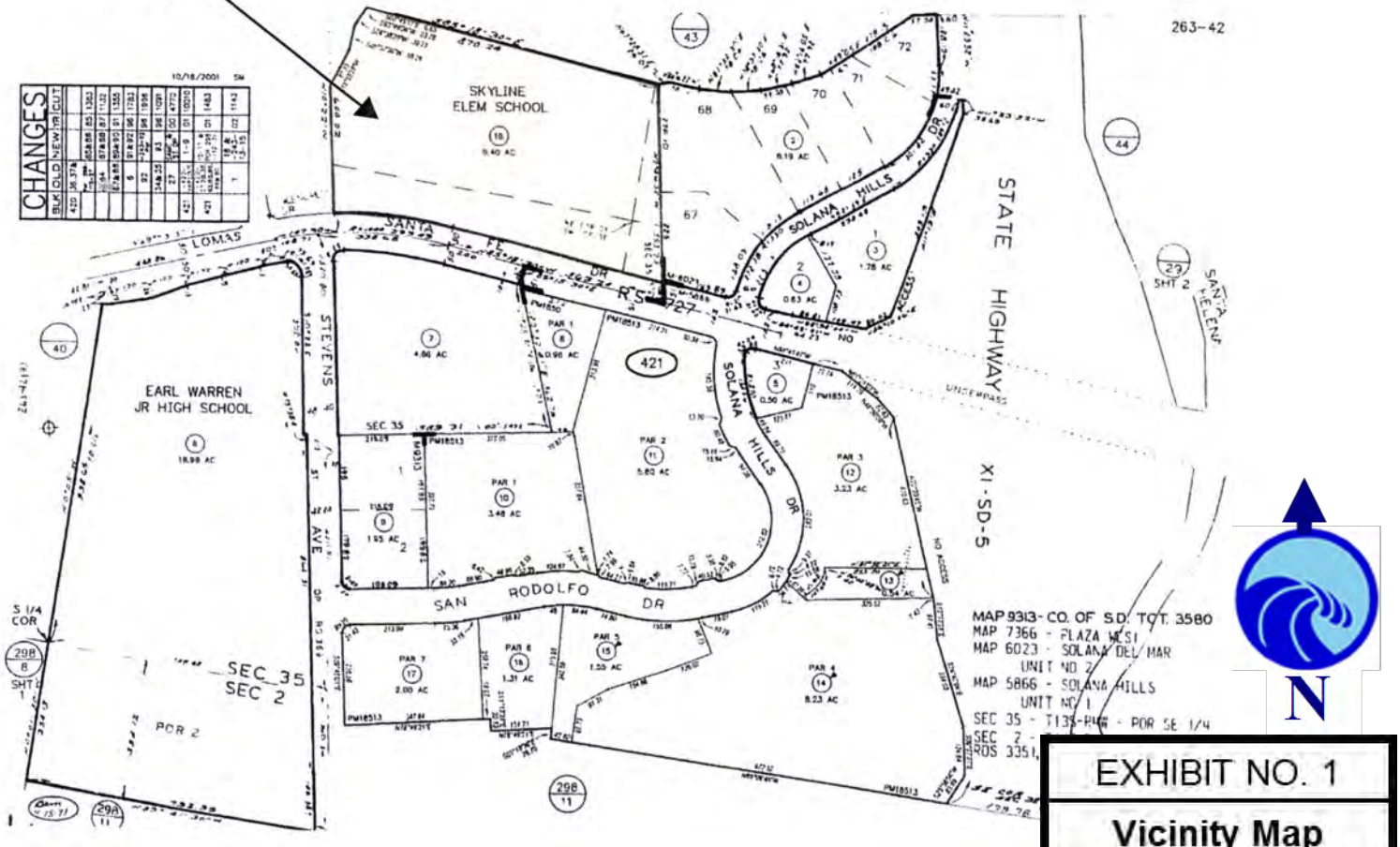


EXHIBIT NO. 1

Vicinity Map

CDP #6-16-0733

California Coastal Commission

AERIAL MAP

Project Boundary

0 175
Scale (Feet)

Source: GoogleEarth, 2016

PlaceWo

N

EXHIBIT NO. 2

Aerial Map

CDP #6-16-0733

California Coastal Commission

PROPOSED CAMPUS SITE PLAN

PROPOSED CAMPUS SITE PLAN

N

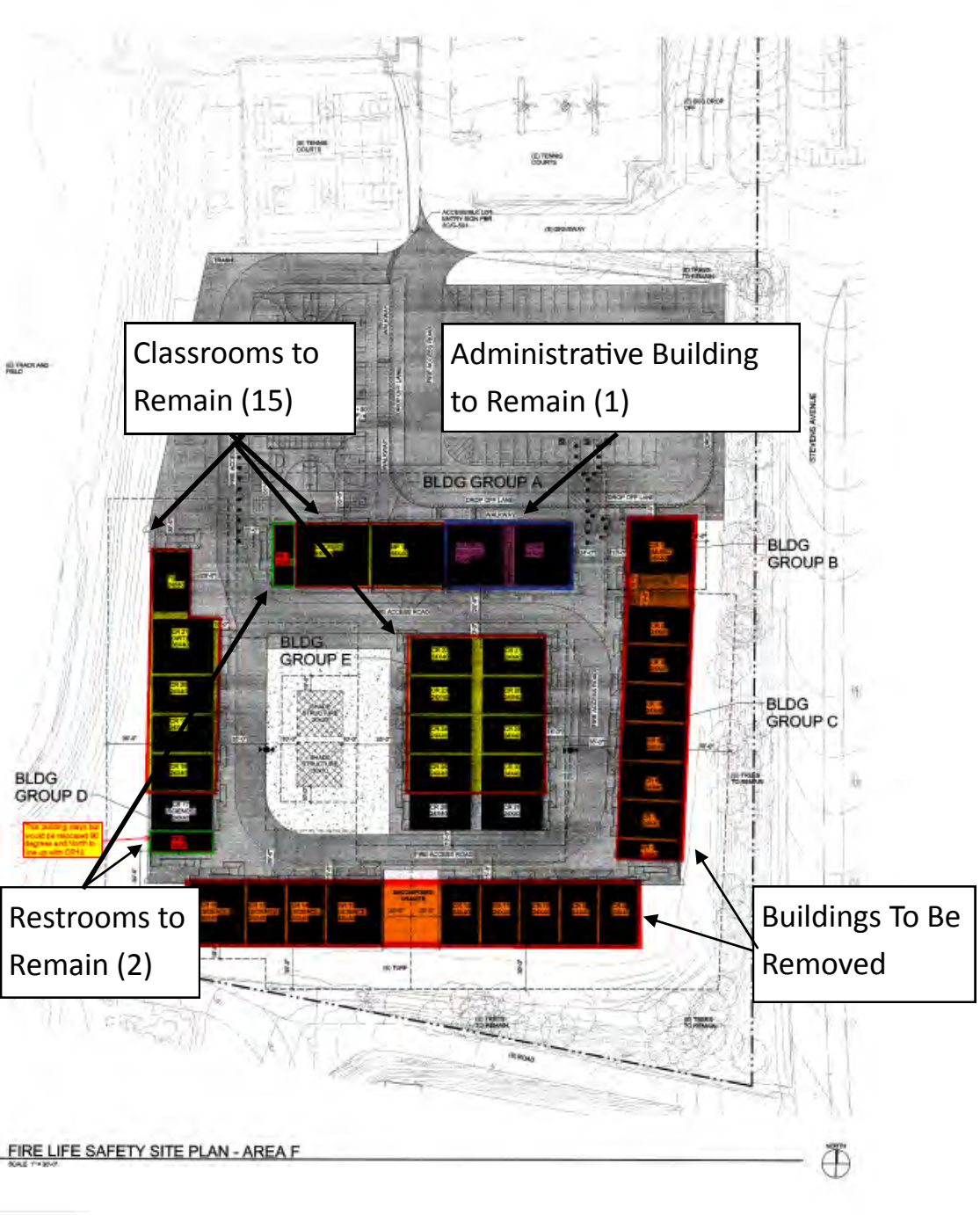
EXHIBIT NO. **3**

Proposed Campus Site Plan

CDP #6-16-0733

California Coastal Commission

TEMPORARY BUILDINGS



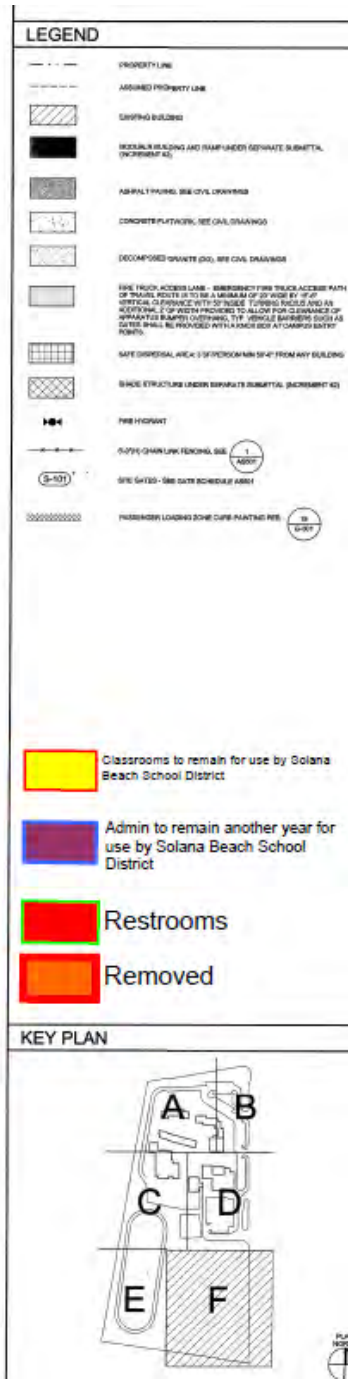


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EXHIBIT NO. 4

Temporary Buildings

CDP #6-16-0733

California Coastal Commission