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W20a

A-6-COR-16-0097 (CORONADO PUBLIC FACILITIES ENHANCEMENT PROJECT)

AUGUST 9, 2017

CORRESPONDENCE



CITY OF CORONADO
OFFICE OF THE CITY MANAGER

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August 2, 2017

Honorable Dayna Bochco, Chair and Commissioners
Kaitlin Carney, Coastal Program Analyst
California Coastal Commission
45 Fremont Street, Suite #2000
San Francisco, CA 94105

**Re: Response to Coastal Commission Staff Report and Recommendation on Appeal de
Novo Coronado South Beach Restrooms, Coronado, California
Appeal No. A-6-COR-16-0097**

Dear Hon. Chair Bochco and Commissioners:

The purpose of this letter is to provide information that addresses issues discussed in the California Coastal Commission (CCC) Staff Report regarding the City of Coronado's South Beach Restroom Project (SBRR) and to provide analysis and facts in support of finding the project consistent with the policies of the Local Coastal Program (LCP) and the Coastal Act, which supports approval of the project by the CCC.

The Coastal Staff recommendation is to deny the City's proposed SBRR project. The recommendation of denial is based on unsubstantiated assumptions and information that is inaccurate and misleading. Coastal Staff concludes that the SBRR project is not consistent with all applicable provisions of the certified LCP and that the project would result in adverse impacts to sensitive coastal resources. The City respectfully disagrees with that conclusion and provides information, below, to show that the SBRR project is consistent with all applicable policies of the certified LCP and the Coastal Act.

The SBRR project has undergone extensive review and scrutiny for more than five years, including numerous public hearings and public meetings. An Environmental Impact Report (EIR) was prepared and technical studies provided through review of the design options, alternatives and impacts. Coastal Staff was consulted early on and its valuable feedback was incorporated into the project that was ultimately approved by the Coronado Design Review Commission, the Coronado Planning Commission, and the Coronado City Council.

Does the proposed project result in significant obstruction of views? No

Coastal Staff's conclusion that the SBRR project results in significant visual impacts is based on misinformation.

The SBRR EIR analyzed visual impacts and concluded **no** significant impacts would result from the proposed SBRR project.

The CCC Staff Report incorrectly states that Avenida del Sol is a designated view corridor. A review of the certified LCP shows that Avenida del Sol is **not** a designated view corridor. The 2010 CCC report regarding the Hotel del Coronado Master Plan correctly stated: "Avenida del Sol is not a designated view corridor, a scenic highway or a major coastal access route." Additionally, a letter to the City from the CCC dated October 18, 2016, correctly stated that Avenida del Sol is **not** a designated public view corridor.

The SBRR building is placed to the side of the cul-de-sac, not at the middle of the street end. The cul-de-sac is offset from the center line of the street and the SBRR is aligned with the southern edge of the street to safeguard views of the ocean.

The SBRR building was re-oriented during the design process to reduce visibility and the building was reduced in size (from six to four stalls, including one ADA-compliant stall) with a minimum number of stalls necessary to meet public needs.

The roof line was designed to be low profile and the colors and materials proposed to blend in and be visually compatible with surroundings, including the rock revetment.

The site is **not** within a designated view corridor. The restroom building is offset from the middle of the street. The SBRR project, as approved by the Coronado City Council, safeguards public views and is visually compatible with the character of the surrounding area, consistent with LCP policies to protect views to and of the ocean.

The letter from PlaceWorks (Attachment 1) provides a detailed review of the visual impact analysis of the proposed project and the impacts of various alternatives.

Does the proposed project conflict with LCP policies related to shoreline protection and coastal hazards? No

Coastal Staff states that Coronado's certified LCP requires new development to be sited outside of a hazard zone, which is incorrect. The policy states: "Require that new development in areas of high geologic, flood, or fire hazard be designed in such a way to minimize risks to life and property." This project has been designed to minimize risks to life and property through the use of a 23-foot-deep steel sheet-pile bulkhead and mat foundation, in compliance with the LCP.

Coastal Staff's focus on the addition of the new sheet-pile bulkhead and its belief that it would alter natural landforms and increase erosion is also misleading. The policy actually states that new development assure stability, neither create nor contribute to erosion or geologic instability, and not require protection devices that would substantially alter natural landforms along bluffs and cliffs.

The project site does not have any natural landforms. The site consists of Avenida del Sol's street-end, rock riprap, and beach-filled sand atop a rock revetment apron installed by the Coronado Shores. These features eliminate any potential upland sand supply and, as confirmed in the wave run-up analysis, the proposed project would not have any impact on sand movement. Additionally, the construction of the proposed sheet-pile bulkhead is not for the protection of the shoreline. Rather, it is for engineering purposes to minimize wave action impacts on the proposed improvements. The proposed sheet-pile bulkhead would not exacerbate the loss of transient beach sand that occurs seasonally. As further discussed in the City's response to comments F-21 and F-34 in the Final EIR, there is no natural sand from adjoining bluffs or cliffs at the site. Therefore, the proposed project complies with the City's LCP policies related to shoreline protection and coastal hazard areas.

The letter from TerraCosta Consulting Group (Attachment 2) highlights a discussion in the CCC Staff Report on FEMA construction standards for the VE zone (where the project is located), including the FEMA Base Flood Elevation (BFE). The CCC Staff Report incorrectly states that the finished floor level is lower than recommended by FEMA but offers no evidence to support its findings. The City's materials, including the geotechnical report and wave run-up study, provide evidence that the project has been designed to be above the FEMA BFE in strict conformance with FEMA Guidelines. The TerraCosta letter further explains that the proposed seawall was designed to be easily removed when the ongoing maintenance of the facility is no longer practical.

Would the project have impacts on shoreline sand supply? No

The EIR and technical study concluded that no significant impacts to sand supply would result because the proposed restroom structure, including its plaza and seawalls, is to be located entirely within the footprint of an existing rock revetment. A detailed analysis is included in the TerraCosta letter (Attachment 2) explaining why the adverse impacts of seawalls and hard structures on coastal resources described in the staff report would not occur. In general, it is mostly because the existing site has already been altered, has a fixed back, and no natural landforms exist.

Does the proposed project conflict with public access and recreation policies of the Coastal Act? No

The SBRR project does not interfere with public access by occupying area that would otherwise be available for public use. The public restroom is a public use. The public restroom is a recreational amenity that will improve public access to the beach and enhance the recreational experience of the beachgoer.

The proposed restroom facility and plaza would be located at an existing beach access area. The project is designed to provide direct beach access from the plaza to the sand. The restrooms, hand washing stations, and shower are all public amenities that would serve the beach-visiting public.

The photos below, taken on a summer day in July 2017, show the SBRR subject site. Because the footprint of the proposed SBRR on the rock revetment and stairway apron (that is sometimes buried) is the access way to and from the stairs, it is not a popular or desirable sitting area, even during the summer season. During the winter season, when the underlying rock may become

temporarily exposed, or during high tide or storm events, the area in question, in its existing form, would have virtually no value to the beach-going public. (Refer to Terra Costa Consulting Group letter (Attachment 2)).



The CCC Staff Report claims that a beach restroom is not a coastal dependent use. However, the certified LCP specifically calls for restrooms to be located “on city controlled beaches.” Additionally, the certified LCP provides an explicit exception to allow for restroom facilities on existing sandy beach areas, just as lifeguard facilities are allowed on the beach. The SBRR is proposed to be sited on the rock revetment and stair access way, which is the least desirable area for recreation use.

Would the project result in adverse impacts to sensitive coastal resources? No

The certified LCP includes a map of environmentally sensitive areas. It should be noted that the proposed SBRR project site is not identified in the certified LCP as an environmentally sensitive site nor is it near any area identified as environmentally sensitive. The site is excess road right-of-way at the end of a cul-de-sac that was improved many years ago with a rock revetment and stairs that provide beach access.

The EIR prepared for the project concluded that **no** significant environmental impacts would result from the proposed project, other than noise during construction.

The site does not contain sensitive resources and the project will not result in any permanent, significant environmental impacts. No adverse impacts to sensitive coastal resources were identified.

Are there alternatives which would both serve the public and avoid or minimize impacts? No

As proposed, the SBRR project does not result in any permanent environmental impacts because the project has been sited and designed to minimize any potential impacts.

Alternatives suggested by Coastal Staff are not consistent with key goals of the certified LCP. In particular, suggested public restroom sites on private property would not be consistent with the LCP goals and policies, which specifically call for the construction of public restrooms on City-controlled beaches. The certified LCP does not call for public restrooms to be constructed on private property.

The "no project" alternative, and alternatives that are infeasible (that will not result in the provision of a restroom) will not serve the public. Alternative sites selected by the City and by Coastal Staff are not equally suitable or superior to the City-approved project for a variety of reasons, including the sites are not City-owned, they would have greater visual impacts, they lack existing infrastructure, they would create excessive operation and maintenance costs, and/or they don't comply with current state codes.

The letter from PlaceWorks (Attachment 1) provides a detailed review of the 15 alternatives considered, illustrates that analysis of alternatives was more than adequate, and explains why none are superior to the proposed project.

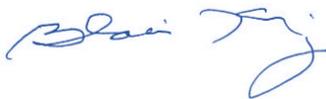
To summarize, we believe this letter provides information that clarifies how the South Beach Restroom Project complies with all applicable policies of the City of Coronado's Certified Local Coastal Program and meets the public access and recreation policies of the Coastal Act. This information shows that the project:

- Creates no significant visual impacts and safeguards existing public view to and along the ocean;
- Does not conflict with LCP policies related to shoreline protection and coastal hazards;
- Will not impact shoreline sand supply;
- Does not conflict with public access and recreation policies of the Coastal Act;
- Will not result in impacts to sensitive coastal resources.

Furthermore, there are no feasible alternatives which would both serve the public and avoid or minimize impacts.

We appreciate your support of this opportunity to implement the goals and policies of the certified LCP and Coastal Act, and to serve the beach-going public by approving the South Beach Restroom Project.

Sincerely,



Blair King
City Manager

Attachments: (1) Letter from PlaceWorks
(2) Letter from TerraCosta Consulting Group



August 2 2017

Rachel A. Hurst
Director, Community Development
City of Coronado
1825 Strand Way
Coronado, CA 92118

Subject: Response to Coastal Commission Appeal Number A-6-COR-16-0097, Restroom Facility in South Beach, City of Coronado

Dear Ms. Hurst:

PlaceWorks has reviewed California Coastal Commission staff report, dated July 21, 2017, for Appeal Number A-6-COR-16-0097 concerning the South Beach Restroom Project. We have focused our review and comments on visual resources and project alternatives.

1. Section D. Visual Resources (Starting on Page 15 of CCC Staff Report)
 - a. Existing Viewsheds. Avenida del Sol is *not* a designated public view corridor. The staff report mentions in several places that Avenida del Sol is a “designated” public view corridor. The LCP does not identify designated scenic highways or roadways; it mentions, however, that portions of the San Diego Coronado Bay Bridge and Silver Strand are officially designated scenic highways. The intersection of Silver Strand and Avenida del Sol is part of the officially designated scenic highway.

Existing ocean views on Avenida del Sol are obscured by a rock revetment with a height up to 12 feet, stairs that provide access to the beach, and cars that are allowed to park at the end of the cul-de-sac.

- b. Modified Building Orientation. The restroom building, seaward of the rock revetment, was originally designed to be perpendicular to the cul-de-sac roughly in the middle of Avenida del Sol. Based on coordination with the CCC, the City reoriented the building approximately 90 degrees, more in line with the roadway, and placed it behind the existing rock revetment on the left side of Avenida del Sol. The reoriented building behind the rock revetment substantially minimizes blockages of ocean views from the north side of Avenida del Sol. In an email dated February 14, 2014, from CCC to PlaceWorks, CCC stated:

The revised alignment of the building to be roughly parallel with the street end **should reduce the visual impacts of the proposed structure** compared to previous alternatives that placed the building perpendicular to the street end. However, there are still likely to be some impacts. Therefore, the environmental analysis should include a comprehensive visual analysis that assesses the impacts to public views from various public vantages, including the top of the street, the street end, the public walkway, and the beach.
(Emphasis added.)

Based on the CCC recommendations, the City continued to move forward with the design of the restroom facility and the EIR process.

- c. Proposed Building’s View Impact. The lead agency is required to use thresholds to determine the significance of a project’s environmental impact. Neither the City of Coronado nor CCC has significance thresholds for aesthetic/view impacts. Therefore, the City used the City of San Diego’s adopted CEQA significance thresholds to determine the proposed SBRR project’s impact on public views.

Using the City of San Diego’s threshold, determination of whether a project significantly obstructs a visual resource (ocean) depends on the size of the obstruction and, to a lesser degree, the surrounding context. In the case of the proposed restroom location, seaward of riprap on Avenida del Sol, the project would alter public views of the ocean, but the alterations are not considered substantial, as shown in Figure 5-3 from the Draft EIR (reproduced below).

Visual simulations of the proposed restroom were prepared based on CCC’s recommendation to assess the impacts from various public vantages, including the top of the street, the street end, the public walkway, and the beach. Below is one of the simulations with views at Avenida del Sol that was presented to the public and CCC in the Draft EIR. As shown, the lower half of the building would be blocked by the rock revetment, and the upper half of the building would blend in with the existing surrounding environment. The exterior wall of the building would have a rock-finish veneer matching the existing rock revetment at the end of the street. Additionally, the rooftop would be the color of the sand, and the height of the building would be approximately the same height as the rock revetment. The building does not stand out, but is designed to blend in.

While current views of the ocean would be altered, as shown in the below graphic, the view obstruction is not substantial, and contrary to the CCC’s staff unsupported determination that the project would result in adverse significant obstruction of views, the view impacts of the realigned restroom facility would be less than significant.



Simulated view of the project site from the same location, assuming Avenida del Sol is at its current elevation.

Source: Hanna Gabriel Wells Architects. February 2015.

Source: South Beach Restroom Project Draft EIR, Figure 5-3, Visual Simulation – North, Existing Elevation

d. Inconsistent CCC Findings. The CCC’s conclusion about the South Beach Restroom project’s visual impacts on public views is inconsistent with its findings on the City’s two other restroom projects. In the CCC staff report for the City’s restroom facility in North Beach (CCC Application No. 6-04-140, Staff Report dated June 22, 2005), CCC based its findings that the restroom building would cause no adverse visual impacts on the following considerations:

- » Building would be tucked up against the existing revetment along Ocean Avenue and would not be visible from the street.
- » The color scheme was chosen to make the structures as inconspicuous as possible.
- » Faced with stone veneer to blend in with the adjacent riprap.
- » Designed to blend in with the surrounding landscape and be as unobtrusive as feasible.

These same descriptors can be used for the proposed South Beach restroom structure. Below is a street view of the North Beach restroom facility. The proposed restroom on Avenida del Sol, which is also tucked into the seaward side of the rock revetment, would be less obvious and less visible than the North Beach restroom.

The color scheme and building materials of the proposed restroom were specifically chosen to camouflage the improvements and blend into the surrounding beach and rock revetment. Comparison between the photo simulation (above) and the photograph of the existing North Beach restroom (below), shows that the proposed restroom would have similar if not less impacts on views than the North Beach restroom, a facility that the CCC previously determined to have no adverse visual impacts and to be consistent with the certified LCP.



Photo Credit: Google Earth, April, 2017.

e. Beneficial Impact. The temporary restroom facility on Avenida del Sol would be removed as a component of the project, and public views of the ocean that are currently blocked by the trailer would be restored. The combined visual effects of the proposed building’s minimized obstruction on ocean views along with the beneficial impact of restoring public views by removing the trailer would further lessen the project’s overall impacts on public views.

At the request of CCC, the City modified the original design of the restroom, conducted a thorough visual analysis using thresholds, provided substantial evidence in the public record regarding the conclusions, and followed the precedent established by CCC during review of a previous restroom building at North Beach. In contrast, the staff report provides an unsubstantiated opinion regarding visual impacts that is in direct conflict with previous CCC determinations for the same beach, in the same City, and for the same kind of project. We believe the conclusions reached in the staff report are in error, and that the CCC should find that the proposed restroom facility does not constitute an adverse impact and are in fact consistent with previous decisions made by the CCC for similar projects in the City. Based on the evidence in the record, the CCC should find that the project is consistent with the certified LCP.

2. Section E. Project Alternatives. (Page 16 of CCC Staff Report)

The staff report states, “less environmentally damaging alternatives do exist,” without giving any evidence that these alternatives would be feasible. At this point, the City has analyzed 15 alternatives, including those in the staff report, and continues to uphold its determination that the proposed project is superior to the “environmentally superior alternatives,” which were required by CEQA to be identified in the Draft EIR. Based on the evidence in the record, there are no alternatives that are both feasible and less environmentally damaging than the proposed project. A feasible alternative is one that can be “...accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social and technological factors” (Public Resources Code Section 21061.1).

The City contacted CCC on numerous occasions and initiated consultation prior to the start of the CEQA process. The City sent CEQA notices to CCC announcing the availability of the NOP and Draft EIR, and CCC never responded. Based on the City’s initial discussions with CCC, the below seven alternatives were analyzed in the Draft EIR.

- 1) Placement at Avenida Lunar (DEIR Section 7.2.1, Alternative Locations)
- 2) Placement at Avenida de las Arenas (DEIR Section 7.2.1, Alternative Locations)
- 3) Placement at Avenida del Sol (DEIR Section 7.2.1, Alternative Locations)
- 4) Alternative Design Orientation seaward of rock riprap at Avenida del Sol (DEIR Section 7.2.2)
- 5) Permanent Operation of Portable Restroom Trailer on Avenida del Sol (DEIR Section 7.2.3)
- 6) No Project Alternative (DEIR Section 7.4)
- 7) Prefabricated Restroom Facility Alternative on Avenida del Sol (DEIR Section 7.5)

Draft EIR Section 7.6, *Environmentally Superior Alternative*, and Table 7-1, *Summary of Alternatives Compared to the Proposed Project*, reviews the City’s finding on alternatives selected for further analysis and concludes that the proposed project seaward of the rock revetment is the least environmentally damaging alternative.

The City received a comment during the Draft EIR public review requesting that a new alternative site be considered for the proposed restroom facility:

- 8) Seaward of Hotel Del Coronado

The City analyzed this alternative location in Response to Comment B-4 of the Final EIR. The analysis concluded that this location would result in greater environmental impacts than the proposed project.

After the release of the Final EIR in September 2016, CCC finally submitted comments, including four additional alternative locations for the proposed restroom project (October 18, 2016):

- 9) Immediately north of the proposed project site, tucked into the existing revetment
- 10) Farther north of the proposed site, seaward of the Hotel Del Coronado, outside of the Avenida del Sol viewshed
- 11) Southeast of the proposed project site, tucked into the existing revetment
- 12) Farther inland on Avenida del Sol than the location of the existing portable restroom facilities (for the prefabricated restroom kiosks)

The City conducted environmental analysis of three of the four suggested alternatives and determined that they were either proposed on private property and/or would cause similar if not greater visual impacts, not only on public views of the ocean, but also possibly on the State Route 75 viewshed. (SR 75 is an officially designated scenic highway.) The fourth alternative location suggested by CCC was to construct the facility seaward of Hotel Del Coronado; this had already been evaluated in Response to Comment B-4 of the Final EIR.

After evaluating the additional alternative sites, the City determined that the proposed project location seaward of Avenida del Sol remained environmentally superior, and no alternative existed that was less environmentally damaging. Accordingly, based on the findings of the Final EIR, the EIR public process, comments received from the public and CCC, and the project's administrative record, the City certified the Final EIR and approved the proposed project.

CCC subsequently suggested four new alternative locations in its staff report. They are evaluated below:

13) Permanent Facility at Temporary Facility Location

This alternative would construct the permanent restroom facility at the same location as the existing, temporary restroom. Below are views of the location, without and with the portable restroom facility.



The red curb and white poles mark the site of the temporary portable facility.
Photo Credit: Google Street View, April, 2017.



Photo Credit: Google Street View, July, 2015.

A variation of this alternative was already analyzed in the Draft EIR. Under the No Project Alternative, the Draft EIR assumed that the proposed facility seaward of the riprap would not be constructed and that the portable restroom facility on the west side of Avenida del Sol would remain in place and operable. Because the analysis assumed that no construction would occur, that no physical changes to the surrounding environment would occur, and that existing conditions would remain as they are, the Draft EIR determined that the No Project Alternative would create no environmental impact. Consequently, it was determined that the No Project Alternative would be superior to the proposed project.

However, although the No Project Alternative assumed the existing restroom facility would continue operating, in reality the cost of maintenance and the physical deterioration of the restrooms would result in its closure and removal. As documented in the record, the temporary restroom trailer was not designed for constant exposure to the marine environment, needs nearly constant repair and maintenance, and has been closed several times due to failure of the system. If a permanent solution for a restroom facility in South Beach is not quickly identified, it is possible the City will have to remove the temporary portable facility entirely. This would return the views of the ocean from Avenida del Sol, but it would leave the South Beach without a public restroom.

The below graphic was included in the CCC-approved Hotel Del Coronado Amended Master Plan and shows a simulated view of Avenida del Sol after all Master Plan improvements are implemented (e.g., widening and raising of Avenida del Sol). If the permanent restroom facility were developed on the west side of Avenida del Sol, it would likely be in the background, near the last car on the right near the motorcyclist, and the building's roofline would likely be at or slightly above the horizon. The building at this location or anywhere along the west side of Avenida del Sol would permanently alter ocean views of the public road.



Source: Figure 5-B, South Beach Guestrooms – View along Avenida del Sol (visual simulation). Hotel Del Coronado Amended Master Plan, August 2010, California Coastal Commission Appeal No. A-6-COR-08-098 & 099

The below graphics are also from the approved Hotel Del Coronado Amended Master Plan. The location of the graphics coincides with the suggested alternative location. The first graphic is of the existing conditions, and the second is a simulated view of the same scene after implementation of all Master Plan improvements.



Source: Existing Conditions – View from Avenida del Sol cul-de-sac. Hotel Del Coronado Amended Master Plan, August 2010, California Coastal Commission Appeal No. A-6-COR-08-098 &-099



Source: Figure 5-H, South Beach Guestrooms – View from Avenida del Sol (visual simulation). Hotel Del Coronado Amended Master Plan, August 2010, California Coastal Commission Appeal No. A-6-COR-08-098 &-099.

For comparison, a mock-up of the Amended Master Plan’s simulation was created with the existing portable trailer (no plaza and with three restroom stalls). As shown, the structure would result in the permanent loss of ocean views that would be presented by the Amended Master Plan improvements.



The proposed restroom facility behind the rock revetment would be less obstructive and less visible from the public roadway (i.e., only the upper portion would be visible) than this alternative, and view impacts of the proposed project would be less than for this alternative. For comparison purposes, a simulation of the proposed project with Avenida del Sol raised is provided below; this simulation was included in the Draft EIR.



Simulated view of the project site from the same location, assuming Avenida del Sol is elevated approximately 4.5 feet, as proposed in the approved Hotel del Coronado Amended Master Plan Project.

Source: Hanna Gabriel Wells Architects, February 2015.

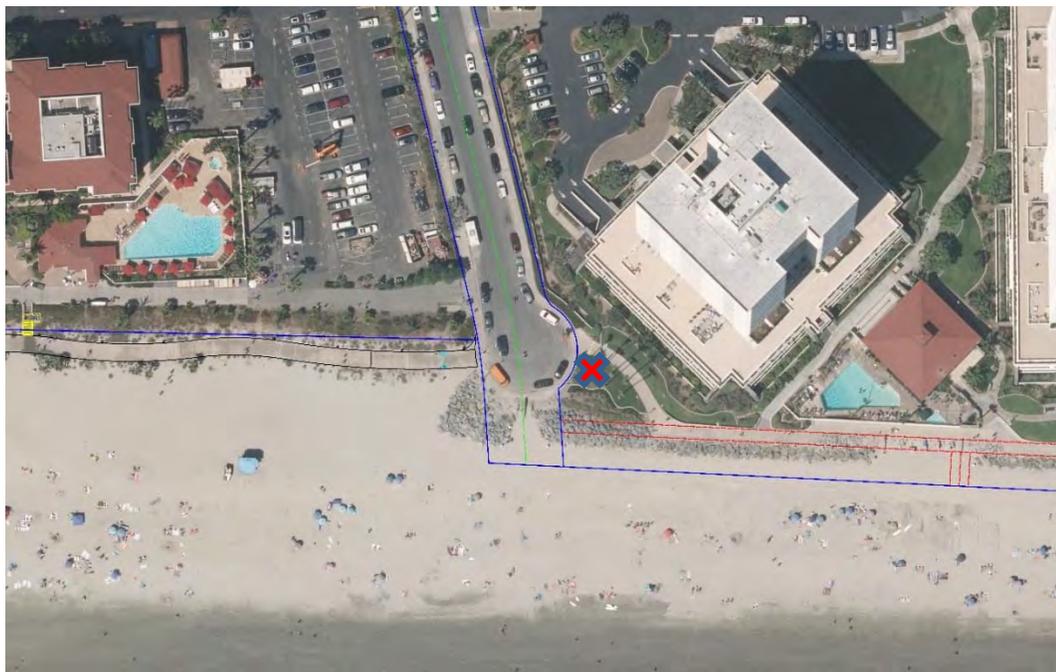
Source: South Beach Restroom Project Draft EIR, Figure 5-4, *Visual Simulation – North, Future Raised Road*.

Contrary to CCC’s finding on this alternative that “[b]ecause the facility would be on the northern edge of Avenida del Sol, impacts to public views could be minimized,” the City believes removal of the existing temporary trailer and placing the permanent facility out of line of sight (such as the proposed location) would significantly improve ocean views from Avenida del Sol. As the restroom building at the proposed location would be less obtrusive than this alternative, the proposed project would be environmentally superior to this alternative.

14) Southeast of cul-de-sac on the grassy area

This alternative would result in the development of the permanent facility atop the grass area in front of the La Sierra Tower of the Coronado Shores condominium development. A similar alternative location was suggested by CCC in its letter dated October 18, 2016, but they recommended the restroom building to be “tucked into the existing revetment,” southeast of the cul-de-sac. Thus, during the City’s initial communications with CCC, CCC was amenable to the project’s location seaward of the rock revetment on the sandy beach and even proposed the October 2016 alternative site on the sand. However, in its staff report, CCC now says that the proposed restroom building should not be constructed on the sand, which is contrary to both the initial correspondence and the alternative site suggested fairly recently in the October 2016 letter.

Similar to the October 2016 alternative location, the suggested grassy alternative site is on private property owned by the La Sierra Tower Homeowners Association, as shown in the below aerial. This alternative is speculative and assumes the landowner who has appealed this project would work with the City to provide land for the restroom. Therefore, it is not a realistic or feasible alternative. The City would also not be able to justify a necessity to take private property, since a feasible publicly owned site (i.e., proposed project site) has been identified.



Source: City of Coronado, 2017.

View impacts at this alternative location would be greater than those of the proposed project. This area contains eight palm trees that would need to be removed, which would negatively affect the view toward the ocean. A permanent building on the grass would also be obtrusive and may result in a larger obstruction of ocean views. Below are graphics that were prepared for the restroom kiosk alternative analyzed in the Draft EIR (i.e., Prefabricated Restroom Facility Alternative) that show the CCC-suggested alternative site. Unlike the proposed location, where a good portion of the building would be hidden behind the rock revetment, the restroom building under this alternative would be more conspicuous. Visual impacts under this alternative would be potentially significant, and the proposed project would be environmentally superior to this alternative.



Source: South Beach Restroom Project Draft EIR, Figure 7-6, *Prefabricated Restroom Facility Simulations*



Simulated view of the project site with the alternative prefabricated facility, assuming Avenida del Sol is elevated 4.5 feet, as proposed in the approved Hotel del Coronado Amended Master Plan.

Source: Hanna Gabriel Wells Architects, February 2015.

Source: South Beach Restroom Project Draft EIR, Figure 7-7, *Future Prefabricated Facility*

15) On the Hotel Del Coronado Property

This alternative suggests that the City work with Hotel Del Coronado to construct a public restroom as a part of the Hotel Del Coronado Amended Master Plan Project. CCC did not state where the restroom facility should be constructed on the 28-acre Hotel property. Furthermore, the Hotel already has numerous restroom facilities for its guests.

Nevertheless, assuming the least environmentally damaging option were selected, which would be the placement of the public restroom within one of the approved buildings, impacts to ocean views would be less than significant, and this alternative would be superior to the proposed project. However, this scenario is not realistic. The City cannot compel the Hotel to include a public restroom on its property and/or as a part of its expansion project, nor would it be able to take—through condemnation or exaction—private Hotel property to develop the public restroom. As the City already owns the land intended for the proposed restroom, there is no budget for land acquisition. Even if property could be negotiated from the Hotel, the cost of purchase or lease would render the project infeasible.

16) Temporary Restroom Facility Site

Under this alternative, CCC suggests that the City consider permanently operating the portable restroom facility at its current location. This alternative was analyzed in Section 7.2.3, *Permanent Operation of Portable Restroom Trailer*, of the Draft EIR, and the feasibility of this alternative is explained in the City's responses to Comments E-3 and E-4 of the Final EIR. As documented, based on its experience with the current portable restroom facility, the City has determined that this alternative is not economically feasible. As discussed above in Alternative No. 13, removal of the existing temporary facility would greatly improve existing public views of the ocean on Avenida del Sol. This alternative would be environmentally inferior to the proposed project.

The City has analyzed 15 project alternatives and has met its obligation to consider a reasonable range of feasible alternatives. Of the alternatives analyzed, the environmentally superior alternative remains the No Project Alternative. The next alternative would be placement of the proposed restroom facility in one of the Hotel Del Coronado buildings, as approved in the Hotel Del Coronado Amended Master Plan Project; however, as indicated, this alternative is neither realistic nor feasible. No new evidence has been provided in the staff report or through separate correspondence that supports another, more environmentally superior alternative.



The City has evaluated every alternative suggested, even those that were known to be infeasible through cost, ownership, or lack of supportive infrastructure. The project itself has been modified several times since its original inception to address the concerns of CCC. It is not unreasonable to construct a permanent public restroom to serve beach visitors, and for a restroom to be located on the beach. The City has successfully constructed just such restrooms in Central and North beaches; both the designs and locations of these facilities were approved by the CCC, as consistent with the LCP. The location of the proposed restroom fits into South Beach visually and environmentally. The interim facilities were not designed for the rigors of the marine environment, and they are failing. Contrary to the staff report's assertion, the proposed restroom will be designed to survive in the marine environment and will therefore result in less maintenance cost and more public service. The City has shown that there is no alternative that is less environmentally damaging than the proposed project, and the proposed project remains environmentally superior.

Sincerely,

PLACEWORKS

A handwritten signature in blue ink that reads "Barbara Wu Heyman".

Barbara Wu Heyman
CEQA Project Manager



Geotechnical Engineering
Coastal Engineering
Maritime Engineering

Project No. 2777
July 31, 2017

Mr. Bill Cecil
CITY OF CORONADO
101 B Avenue
Coronado, California 92118-1502

**COMMENTS ON COASTAL COMMISSION STAFF REPORT
AND RECOMMENDATION ON APPEAL DE NOVO
CORONADO SOUTH BEACH RESTROOMS
CORONADO, CALIFORNIA**

REFERENCE: APPEAL NO. A-6-COR-16-0097

Dear Mr. Cecil:

We have reviewed the Coastal Commission Staff Report and Recommendation on Appeal De Novo dated July 21, 2017. Below are our responses to technical comments in the order that they are presented in the Staff Report.

On Page 9, under Development in a Currently Hazardous Area, Staff notes that the project is located in a FEMA VE Zone-Coastal High Hazard Area. What they do not report, specific to the FEMA guidelines, is that FEMA does allow construction within VE Zones when the structure is designed to accommodate anticipated wave forces, and notably when minimum building foundations are above the FEMA Base Flood Elevation (BFE) (Section 4-FEMA Mapping, January 17, 2013, Wave Runup Study Report). The project as designed complies with all of the FEMA guidelines. At the top of Page 10 of the Staff Report, Coastal Staff concludes that the finish floor elevation [is] lower than recommended by FEMA. This is incorrect and clearly explained in Section 4 of our January 2013 Wave Runup Study. A significant part of the wave runup study was choosing a conservative finish floor elevation, ultimately selected at 10.6 feet NGVD 29, or almost 4 feet higher than the unreasonably low FEMA BFE of 6.8 feet (NGVD 29).

At the top of Page 10, the Coastal Commission Staff Report goes on to incorrectly state that the TerraCosta geotechnical investigation report states, "that including the sheet-pile seawall in the design makes up for the lower than FEMA recommended floor elevation."

As indicated above, we previously noted that the FEMA BFE is unreasonably low (6.8 feet NGVD 29) and recommended a minimum finish floor elevation of 10.6 feet, or 3.8 feet above the FEMA BFE. However, more importantly, the top of the bulkhead was set at 13.0 feet, or 6.2 feet above the FEMA BFE. Importantly, FEMA does allow the construction of structures within the VE Zone, with the proposed design in strict conformance with FEMA guidelines, which we have complied with.

On Page 10, second paragraph under Non-Coastal Dependent Uses and Shoreline Protection, while Coastal Staff is generally correct in summarizing some of the adverse effects of seawalls on coastal resources, they fail to note that this particular structure sits entirely within the footprint of an existing rock revetment, which arguably currently inadequately protects the street-end. Even a casual examination of the Site Plan in TerraCosta's geotechnical report (Figure 3), along with Cross Sections A and B (Figures 4 and 5), shows that the revetment currently occupies the existing footprint of the proposed wall, resulting in none of the adverse impacts cited by Coastal Staff on Page 10. Specifically, 1) There is no loss of the beach/bluff area on which the structure is located, since there is already an existing rock revetment that entirely covers this area, albeit a large portion of the rock revetment is buried by transient beach sands; 2) There is no long-term loss of beach/bluff created by the proposed project, as the entire back beach of this area has already been fixed by the existing rock that was placed circa 1970, along with a protective 12-foot-wide toe apron placed circa 1983; and 3) This project has no impact on any material that would have been supplied to the beach, since the entire back beach is already covered by a rock revetment on which the proposed project is to be constructed.

On the top of Page 11, Coastal Staff discusses previous findings that restrooms shall be deemed expendable and designed to be removed or relocated if threatened. To be clear, the currently proposed seawall, placed entirely within the footprint of an existing rock revetment, is in fact relatively easily removable and City Staff clearly recognize that this temporary bulkhead is a bulkhead of convenience intended to minimize wave overtopping associated with the current coastal environment. Given the current coastal environment, we anticipate periods of minor overtopping on average once every five years, consistent with the wave environment along the Del Mar shoreline. Unlike the City of Del Mar, where seawalls protect valuable private properties, this seawall was designed to be easily removed at the point when the ongoing maintenance of the facility



was no longer practical in view of a changing coastal environment. The project as designed remains consistent with Coastal Commission policies, whereby the City can easily remove all of the currently proposed improvements if a changing environment justifies the removal of those improvements. Given the current coastal environment, this project does in fact provide an important coastal dependent public service and is the least environmentally damaging of all of the alternatives considered. The proposed project has been designed to be removed or relocated if threatened.

On Page 11 under Sea Level Rise and Future Hazards, while we appreciate Staff's comments, and as indicated above, we should not lose sight of the fact that an existing rock revetment entirely covers the footprint of the proposed improvements and, importantly, that revetment, while substantial just to the south and in front of the Coronado Shores, is substantially lower in the vicinity of the Avenida Del Sol street-end. Again, unlike the revetment fronting the Coronado Shores, the City has committed to removing the proposed facilities if future sea levels rise to a point where the ongoing operation and maintenance of the facility no longer meets the City's ongoing maintenance criteria.

On Pages 12 and 13 of the Staff Report, certain provisions of the LCP are stated, along with Staff's conclusion that this project is not in conformity with the public access and recreation policies of Chapter 3 of the Coastal Act. Given the removable nature of the proposed facilities, City Staff disagrees with Coastal Staff's conclusions and does believe that given the removable nature of this facility, the proposed development shall be permitted, consistent with the beneficial uses of restroom facilities and the current negligible impact to the public beach given the removable nature of the proposed improvements.

The top paragraph on Page 14 suggests that the existing 1,000 square feet of beach area that would be occupied by the proposed improvements has more value than the proposed improvements, including during the winter season when the underlying rock may become at least temporarily exposed, during which time we believe the 1,000 square feet in question would have virtually no value to the beach-going public. In contrast, the proposed project significantly improves beach access off of Avenida Del Sol and provides a plaza area adjacent to the beach that City Staff believes will be a significant



improvement over the existing conditions in this 1,000 square foot section of sloping rock revetment.

In the second paragraph on Page 14 discussing the second effect that any hard structure has on the beach is irrelevant to this project, as the existing entire 1,000 square feet of the proposed project area is currently underlain by a rock revetment that has already impacted the sand supply. Moreover, arguably, the existing rock revetment, and the proposed seawall for that matter, provides valuable protection for the public access street-end.

The third paragraph on Page 14 discussing the third effect of a shoreline protection device is again irrelevant to this project because of the existing rock revetment that already occupies the entire project area.

Similarly, the fourth paragraph on Page 14 discussing the cumulative effects of shoreline protection devices on shoreline sand supply is again irrelevant due to the presence of the existing rock revetment.

The fifth paragraph on Page 14 suggesting the benefits of a more landward location is again irrelevant due to the presence of the existing rock revetment.

The last paragraph on Page 14 extending onto the first paragraph on Page 15 finally notes the presence of the approximately 2,000-foot-long rock revetment built in the early 1970s to protect the Coronado Shores condominiums. In this paragraph, Coastal Staff argues that even with the revetment in place during much of the year, a sandy beach covers the lower portions of the revetment providing public access to the sandy beach. It is the City's belief that the proposed improvements are actually an amenity over the existing partially buried rock revetment in that, in addition to the necessary restrooms, there is also a small public plaza that includes open shower facilities and improved beach access, which the City considers an amenity over that which currently exists.



We appreciate the opportunity to be of assistance to the City of Coronado. If you have any questions, please feel free to contact us.

Very truly yours,

TERRACOSTA CONSULTING GROUP, INC.



Walter F. Crampton, Principal Engineer
R.C.E. 23792, R.G.E. 245

WFC/jg





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August 13, 2015

By e-mail (bcecil@coronado.ca.us);

Original to follow

William Cecil
Capital Projects Manager
City of Coronado
1825 Strand Way
Coronado, California 92118

Re: Comments on South Beach Restroom Project Draft Environmental Impact Report

Dear Mr. Cecil:

The law firm of Chatten-Brown & Carstens represents Coronado Shores Homeowners Association No. 2 (“Association”) on matters relating to the proposal by the City of Coronado (“City”) to build a restroom at the street-end of Avenida del Sol. At the Association’s request, we have reviewed the Draft Environmental Impact Report (“Draft EIR”) and accompanying studies. We have found numerous flaws, inconsistencies, and omissions such that the Draft EIR fails to comply with the California Environmental Quality Act (“CEQA”), Public Resources Code section 21000 et seq., and the CEQA Guidelines, California Code of Regulations, Title 14, section 15000 et seq. These problems relate to water hydrology and flooding; sea level rise; impacts on sand supply; aesthetics; odors; cumulative impacts; the failure to consider an alternative location for the restroom; and consistency with the Coastal Act, the City of Coronado Municipal Code, and a State Lands Commission easement. One of the objectives of the project is to select a site in South Beach that will accommodate the largest number of visitors. Yet, no facts were provided nor analysis conducted as to whether the proposed site fulfills this objective.

Once sufficient investigation has been performed, enforceable and effective mitigation measures and a reasonable range of potentially feasible alternatives must be set forth in a Revised Draft EIR. The Draft EIR must then be recirculated so that the public and public agencies may comment on this information, as required by CEQA.

1. The Likelihood of the Project Being Flooded by Rain and Sea Water from Storm Events Was Not Adequately Analyzed.

One of the three areas of controversy known to the City is “Whether the proposed improvements can withstand potential wave action from a storm.” (Draft EIR (hereinafter “DEIR”), p. 1-8.) Yet, this issue was not analyzed in the EIR.

The EIR merely claims, without any supporting evidence or analysis, “Flood hazard impacts of the proposed project would be less than significant.” (DEIR, page 7-27.) However, the project site is located in a Coastal High Flood Hazard Area, which is a 100-year flood zone mapped by the Federal Emergency Management Agency (FEMA). (DEIR, p. 7-16.) Historically, the project location floods following heavy rains, and this flooding is frequently severe. (Figures 1, 2.) In the Hotel Del Coronado Amended Master Plan, the City recognizes that there are “flooding problems which currently exist” at the Avenida del Sol cul-de-sac. (Exhibit A.)

The potential for seawater intrusion into the Project structure was similarly not analyzed in the EIR. The Project is approximately 50 feet or less from the visible high tide line in one of the photographs used in the DEIR. (*See* DEIR, p. 4-5.) The Wave Runup Study completed for the Initial Study explained that the area containing the project site is experiencing sediment depletion, and North Island is gaining beach at the expense of coastal erosion from the southern and central portions of the Silver Strand Cell, which includes the project site. (Initial Study, Vol. 2, p. G-7.) The Wave Runup Study concludes, “Shore erosion problems will continue throughout most of the Silver Strand Littoral Cell as a result of this sediment deficit.” (*Ibid.*)

FEMA guidelines recommend that any new site construction in the Coastal High Hazard Area be located landward of the long-term erosion setback and landward of the area subject to erosion during the 100-year coastal flood event. (Initial Study, Vol. 2, p. G-7.) Using this criteria and absent any sea level rise, the minimum finish floor elevation should be approximately 11.25 feet (NGVD 29).¹ (*Id.* at G-8.) However, the floor elevation of the proposed project would be less than this, at 10.6 feet (NGVD 29). (DEIR, p. 3-3.)

Not accounting for sea level rise and only accounting for the tide, storm surges, and wave runup, the water level is projected to reach 10 feet in less than 10 years. (Initial

¹ NGVD 29 stands for National Geodetic Vertical Datum of 1929. This system has been used by surveyors and engineers since early in the 20th century and has been the basis for relating ground and flood elevations.

Figure 1-1



Figure 1-2



Figure 1-3



Figure 1
Photos taken by Paul Talbot of Avenida del Sol cul-de-sac in July 2015.



Figure 2

Photos taken by Cynthia Miller of Avenida del Sol cul-de-sac in 1982.

Study, Vol. 2, p. G-7 [Line labeled “Tide +NTR + Runup”].) However, these projections do not account for scouring (*id.* at G-12), which is the process by which water can remove sand by forcefully flowing over an object. The Water Runup Study concluded that “during extreme high tide and high surf erosion circumstances, the scoured beach elevation is likely to drop to levels that approach mean sea level or up to 9 feet of scour.” (*Ibid.*)

In the Wave Runup Study, the City’s consultant stated:

Finally, we recommend that City of Coronado Staff regularly determine the ... elevation and the extent of maximum beach flooding during winter wave storms at this location and other locations of engineering interest. Simple handheld GPS devices would probably suffice to accomplish these objectives. This information would greatly improve our ability to calibrate ... wave-driven runup models and thereby reduce the uncertainty in projecting future conditions.

(Initial Study, Vol. 2, p. G-19.) This recommendation was made in December 2012. (*Ibid.*) Despite the ease of performing these activities, it does not appear the City followed its consultant’s recommendation over the last two and a half years. This information should be obtained and disclosed.

2. The Impact of Projected Sea Level Rise Should Have Been Fully Analyzed in the EIR.

While the Wave Runup Study concluded that the water level is projected to reach 10 feet in less than 10 years, this conclusion was not accounting for anticipated sea level rise. With a median sea level rise of 0.5 meters, the Wave Runup Study indicates that water could reach the project’s 10.6-foot level within several years. (Initial Study, Vol. 2, p. G-36.)

Recent studies have confirmed the real risk that Coronado Beach, and the proposed project site in particular, face from projected sea level rise. One study, which provides a map that includes the project site, projects that by 2050, tidal fluctuations alone would inundate the sandy beach. (Figure 3, Exhibit B, p. 16 [Figure 5].) Adding run-up from moderately common wave events, which are expected to occur every few years, results in flooding of the majority of sandy beach and a portion of the parking lot at the Hotel Del Coronado. (*Ibid.*)

Another map predicting sea level rise for waterfront development, which was prepared by Environ for the San Diego Port Authority using research data from local

Figure 5. Coronado Beach and Shores



Tidal fluctuations alone (purple) appear to inundate sandy beach and jetty. Adding run-up from moderately common wave events (blue) floods the majority of sandy beach and portion of parking lot at the Hotel Del Coronado. Very rare wave events (red) flood sandy beach, some surface streets and heavily used boardwalk in front of hotels. “Coronado” is spelled out in the artificial dunes by the beach (maintained by a local resident) and demonstrates the fidelity of the LIDAR measurements.

Figure 3
Projected Coastal Inundation
at Project Site in 2050.

scientists at Scripps Institution of Oceanography and San Diego State University, projects that the project site will be inundated by 2050 as a result of sea level rise. (Exhibit B.)

The Wave Runup Study indicates that even without sea level rise, the water levels would approach the project site within a decade. (Initial Study, Vol. 2, p. G-22 [Baseline of 10.16 feet during the decade].) Factoring in future sea level rise, the water levels are projected to approach the project site from every several years (with a 0.5 meter median sea level rise) to monthly or weekly flooding at 1.0 to 2.0 meter median sea level rise projections. (*Ibid.*) Despite the Wave Runup Study's cautionary note that coastal infrastructure is sensitive to flooding and damage from the range of possible future median sea level rise scenarios (*id.* at G-11), the EIR does not analyze the impacts of sea level rise on the project.

3. The Proposed Project's Potential Adverse Effect on Shoreline Sand Supply Was Not Analyzed.

The beach at the project location is quite narrow. The distance from the stair platform behind the proposed structure to the intersection of the NGVD elevation plane with the beach face is approximately 140 feet. (Initial Study, Vol. 2, p. G-13.) The Wave Runup Study estimated that seasonal fluctuations in beach width reach about 130 feet (*ibid.*), which would result in a minimum of 10 feet of seasonal beach width. However, the study cautioned that the seasonal fluctuations are only an estimate since no beach width surveys have been conducted. (Initial Study, Vol. 2, p. G-13.)

The project location, which has a seasonal maximum beach width of approximately 270 feet, is vulnerable to future wave storms. (*Ibid.*) These storms are projected to occasionally cause 300- to 500-foot beach losses, which the Study concludes "would lead to flooding and potential damages to back beach structures such as the proposed restroom." (*Ibid.*) Serious episodic beach loss at Avenida Del Sol may be expected about every 4 to 5 years on average. (*Id.* at G-14.)

The Wave Runup Study concluded that future anticipated sea level rise is expected to exacerbate the negative effects of the sand shortages described in Section 1 above. (Initial Study, Vol. 2, p. G-7.) Projected total losses range from 65 to 280 feet by 2100, depending on the mean sea level rise scenario. (*Ibid.*)

The EIR recognizes that the Coastal Act "typically discourages the construction of shoreline-altering devices to protect new development along the shoreline because of the potential adverse impact these structures can have on shoreline sand supply." (DEIR, p. 10-2.) Also, "[c]onstruction of shoreline-altering features is typically discouraged by the C[alifornia] C[oastal] C[ommission] because of their potential to adversely impact

shoreline sand supply and for reasons that would undermine the features as unusable, including but not limited to sea level rise and significant scour that would undermine the sea wall.” (DEIR, p. 9-2, fn. 1.) Despite the project’s inclusion of a shoreline-altering device to protect the restroom, the EIR justifies the project on the basis that the proposed facility can be easily removed. (DEIR, p. 10-2.) This fails to address the project’s potential impacts on shoreline sand supply. Moreover, rather than installing a permanent facility that might need to be removed shortly after installation, which would not be a proper use of taxpayer monies, this analysis should be done in advance or a temporary restroom should instead be utilized *if* the proposed location is retained.

4. Beach Width Surveys Should Be Conducted to Accurately Project Future Conditions and Whether the Proposed Project Would Be a Permanent One.

One of the objectives of the project is to “[d]evelop a permanent public restroom facility.” (DEIR, p. 3-1, *emphasis added*.) However, as discussed above, the small existing beach width, when combined with storm events, sea level rise, scouring, and sand depletion, raises serious doubts as to whether this project would be a permanent facility.

In order to properly project future conditions, the City’s consultant advised the City in December 2012 to regularly determine seasonal minimum and maximum beach width:

Finally, we recommend that City of Coronado Staff regularly determine the seasonal minimum and maximum beach width and elevation and the extent of maximum beach flooding during winter wave storms at this location and other locations of engineering interest. Simple handheld GPS devices would probably suffice to accomplish these objectives. This information would greatly improve our ability to calibrate the beach width change and wave-driven runup models and thereby reduce the uncertainty in projecting future conditions.

(Initial Study, Vol. 2, p. G-19, *emphasis added*; see also Initial Study, Vol. 2, p. G-13 [“This uncertainty suggests that once or twice per year, beach width surveys in the fall or fall and spring should be done to track the future history of beach configuration at this location.”])

This information should be obtained in order to accurately project future conditions and whether the project is sited in a location such that the project would be permanent.

5. The Project's Visual Impacts Were Inadequately Analyzed.

The City's Open Space element encourages the preservation of scenic corridors and view sheds. (DEIR, p. 5.1-4.) The Coastal Act also establishes high standards for visual aesthetics and encourages the preservation of these scenic qualities as recreational resources. (*Ibid.*) Permitted development must be sited and designed to safeguard existing public views to and along the ocean shores of Coronado. (*Ibid.*)

The EIR claims that views of the ocean would not be substantially obstructed, referring to photo simulations from three vantage points. (DEIR, pp. 5.1-8 – 5.1-13.) However, the photo simulations show that the structure would substantially obstruct views of the ocean. (*See* Figure 5-1 [DEIR, p. 5.1-9]) and Figure 5-3 [DEIR, p. 5.1-15].) Furthermore, no photo simulation was provided from the end of the cul-de-sac at Avenida del Sol, which could be a primary public access entry point to the beach. Even more importantly, though the EIR claims the aesthetics will be improved when (and *if*) the street is raised, there is no real analysis of how the raising of the street will impact views from various locations.

6. The EIR Should Fully Analyze the Impact of the Proposed Project in the Context of the Approved Hotel Del Coronado Project, Including Raising the Street 4.5 Feet Adjacent to the Proposed Project.

We have attempted to contact representatives of the Hotel Del Coronado to, among other things, find out the status of their approved project. It is our understanding that the City's raising of Avenida del Sol to reduce flooding is subject to securing funding. In our view, it makes little sense to build a restroom at the end of Avenida del Sol, with the necessary sewer and water hook-ups, and then have those torn out as part of the street raising project. The two projects, if conducted at all, should be coordinated.

7. Odors and Odor Containment Were Not Analyzed.

The Initial Study concludes that operational odor impacts would be less than significant and would not be further analyzed in the EIR. (Initial Study, Volume 1, p. 48.) The Initial Study reasons that since the restroom does not fall into a category of facilities that are considered to have objectionable odors (e.g., compost facilities and solid waste transfer stations), the restrooms would not generate objectionable odors. (*Ibid.*) However, it is generally recognized that the use of public restrooms and the use of chemicals to clean these restrooms may create objectionable odors. This issue should have been analyzed in the EIR.

8. The EIR Fails to Adequately Analyze the Project's Consistency with the Coastal Act.

“The project site is within the City’s Coastal Permit jurisdiction and within the appeal jurisdiction of the California Coastal Commission (CCC). The City’s decision on the proposed project may be appealed to the CCC.” (DEIR, p. 3-4, fn. 1.)

Coastal Act section 30235 provides that seawalls and other similar construction that alters natural shoreline processes shall be permitted when required to serve coastal-dependent uses or to protect existing structures or public beaches in danger from erosion, and when designed to eliminate or mitigate adverse impacts on local shoreline sand supply. When considering another restroom project on the beach, Commission staff said “the restroom does not have to be located on the beach to serve its function.” (Exhibit C, p. 16, *emphasis in original*.) Thus, a restroom is not required to serve coastal-dependent uses. Nor is the restroom an existing structure.

The DEIR recognizes: “Construction of shoreline-altering features is typically discouraged by the CCC because of their potential to adversely impact shoreline sand supply and for reasons that would undermine the features as unusable, including but not limited to sea level rise and significant scour that would undermine the sea wall.” (DEIR, p. 9-2, fn. 1.) For the Coronado Lifeguard and Restroom project, the Coastal Commission included a special condition requiring the City to waive all rights to construct shoreline protection for the restrooms. (Exhibit C, p. 16.)

Evidence indicates that the Coastal Commission will not authorize the use of a sea wall for the proposed project. A May 6, 2015 memorandum between City officials details Coastal Commission staff’s consistent position, since 2013, opposing a permanent building on the beach and the use of a sea wall. (Exhibit D.) In 2013, Commission staff expressed two concerns:

If the building did not have some life safety component, staff would not favor a permanent building on the sandy beach. Second the current design in their opinion would block the ocean view from Avenida del Sol.

(*Id.*) During a meeting in 2014, Coastal Commission staff indicated that if the Coastal Commission were to review this project, the removal of the sea wall would be a condition of approval. (*Id.*) In light of the Coastal Commission’s consistent position, the EIR’s failure to evaluate whether the project could be designed in the proposed location without a sea wall is fatal.

Additionally, Coastal Act Section 30253 provides that new development must assure stability and structural integrity and not contribute significantly to erosion. As previously discussed, the project may have an adverse impact on shoreline sand supply.

9. The EIR Fails to Adequately Analyze the Project's Consistency with the City of Coronado Municipal Code.

City of Coronado Municipal Code Section 86.74.020 provides:

No new development shall occur on existing public sandy beach areas. An exception would be allowed for new or expanded permanent lifeguard facilities, restroom facilities, bikepaths or similar public recreation facilities, if it can be determined by the City that adverse impacts to public beaches are negligible or when public safety or health requires it; and provided, that no less environmentally damaging alternatives exist. This prohibition shall not be construed to restrict or regulate the maintenance, repair, rehabilitation or replacement of existing public facilities, or the activities of any governmental agency other than the City of Coronado on property under that agency's jurisdiction.

In the instant case, the impacts are not negligible, as previously discussed, public safety or health does not require it, and less environmentally damaging alternatives exist.

10. The EIR Fails to Adequately Analyze the Project's Consistency with the State Lands Commission Easement.

A 1966 Boundary Line Agreement established a 100-foot wide easement, granted to the City along the length of the boundary line, for "public recreational beach use, and for no other use" and stipulated that said easement "may not be terminated or substantially changed by any party hereto without concurrence of the State." (Exhibit E, p.1.)

In an April 11, 2014 letter, the State Lands Commission said, "However, should the City desire to utilize the area within the 100-foot easement created by BLA 85 for any purpose other than public recreational beach use, Commission review and approval may be required." (Exhibit E, pp. 1-2.)

The City should analyze whether the proposed project will be located within the 100-foot easement created by the Boundary Line Agreement.

11. The Lack of Feasible Alternatives Is An Unsupported Conclusion.

One of the areas of controversy known to the City is “[w]hether there is a demand for a permanent restroom facility at the proposed site.” (DEIR, p. 1-8.) Following the installation of a temporary restroom facility adjacent to the project site for a one-month period, and its alleged approximately 1,000 uses per week, the EIR concludes that there is a sufficient demand to warrant a permanent facility. (DEIR, p. 4-2.) However, this reasoning is flawed. Based upon observations, and their own frequent use of the beach, members of the Association believe that a large percentage of beachgoers at the beach near the proposed project are visitors, guests, or residents of Coronado Shores Condominiums or the Hotel Del Coronado. If presented with the opportunity to use a restroom closer to restrooms available to them at the Coronado Shores Condominiums or the Hotel Del Coronado, these individuals may have opted to use the portable restroom facility. However, in the absence of this portable restroom, these individuals are able to use the nearby private restroom facilities available to them. Thus, even assuming the 1,000 weekly uses figure is accurate, the EIR’s statement does not demonstrate a need for a public restroom at this location.

Additionally, the City does not provide any information on how the “approximately 1,000 uses per week” was calculated. Is this merely speculation by City officials, or was this number based on certain data obtained? If it is the latter, this data should be disclosed to the public in the EIR.

One of the objectives of the project is to “[s]elect a site in South Beach that will accommodate the largest number of visitors.” (DEIR, p. 7-2.) The City should conduct a survey to determine what number of visitors various alternative locations will accommodate. Logically, due to the presence of a 97-space public parking lot at Avenida de las Arenas (DEIR, p. 7-3), this alternative location may accommodate the largest number of visitors.

While the City holds an easement for Avenida de las Arenas, the EIR concludes that development of the project at that location would require an amendment to the easement. (DEIR, p. 7-4.) However, the EIR states, “The City is a holder of an easement for [Avenida de las Arenas] for its use as a parking lot, access to the beach, and operation of infrastructure.” (DEIR, p. 7-3.) The EIR should address whether a restroom facility may constitute operation of infrastructure, and thus comply with the terms of the existing easement. Further, the City should consider the exercise of its eminent domain powers if necessary in order to facilitate construction of a restroom that would provide the greatest access for the public while minimizing impacts on the sand, hydrology, and creating other adverse environmental impacts.

In support of the proposed project location, the EIR claims that the proposed location “has additional benefits over the other sites,” including “Closest to the majority of South Beach visitors,” “Greatest visibility,” and “Widest stretch of sandy beach between land and water.” (DEIR, p. 7-3.) The EIR provides no evidence to support its conclusions. In fact, a satellite photograph from Google Maps demonstrates that the beach at Avenida del Sol is equal to or narrower than the beaches at Avenida de las Arenas and Avenida Lunar. (Exhibit F.) As previously mentioned, the beach in front of the proposed project site is extremely small, measuring only approximately 50 feet from the high tide line in one of the satellite photographs used in the DEIR. (Exhibit G [measured using the distance legend provided].)

The City failed to analyze additional alternative locations because it concluded the proposed location is “the most feasible on-sand option.” (DEIR, p. 7-11.) As previously discussed, locating a restroom on the beach is not necessary, as the restroom is not beach dependent, and siting a structure on the beach results in significant impacts to shoreline sand supply. Therefore, alternative project locations should not be limited to “on sand” locations.

In an e-mail to City officials, Coastal Commission staff explained the importance of analyzing alternative off-sand locations.

While the proposed restrooms would provide a beach amenity at this portion of the beach, the Commission must weigh the benefit of new recreational support facility against the loss of sandy beach area that would result from the new construction. The analysis should explore other nearby possible sites that do not place the structure directly on sandy beach.

(Exhibit H, p. 2, *emphasis added*.) The staff report added that “the restroom does not have to be located on the beach to serve its function.” (*Ibid.*)

The EIR states that existing public restroom facilities are at least 0.5 miles from the project site. However, if the City installed a stoplight and crosswalk at the intersection of Strand Way and Avenida del Sol, the distance to public restroom facilities would be .33 miles. (Exhibit I [showing a distance of 1,785 feet].) This is a similar distance from the public parking lot at Avenida de las Arenas to the proposed restroom location and a shorter distance than for visitors using the beach near Avenida Lunar to walk to the proposed project site (Exhibit J [showing an approximate distance of 1,500 feet from Avenida de las Arenas and 2,100 feet from Avenida Lunar].)

Importantly, the EIR fails to consider that for those visitors parking at the large lot at Avenida de las Arenas, the distance to the public restrooms at City Hall is shorter than the distance to the proposed restrooms at Avenida del Sol. (*Compare* Exhibit K [showing a distance of 1,396 feet from the beach at Avenida de las Arenas to City Hall] *with* Exhibit J [showing a distance of approximately 1,500 feet from the Avenida de las Arenas to Avenida del Sol]).

CONCLUSION

The Draft EIR must be revised with this new information and then recirculated for public comment. (CEQA Guidelines section 15088.5.) New information should include analysis of off-sand project alternatives, including a temporary or possibly even permanent restroom at Avenida de las Arenas, as well as a temporary restroom at Avenida del Sol that would lessen the adverse impacts of the proposed project and better serve the beach going public.

Pursuant to Public Resources Code section 21092.2, we request all notifications regarding this Project.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Josh Chatten-Brown". The signature is written in a cursive style with a long, sweeping underline that extends to the right.

Josh Chatten-Brown

EXHIBIT A



HOTEL DEL CORONADO

Amended Master Plan

August 2010

California Coastal Commission
Appeal No. A-6-COR-08-098 & -099



Avenida del Sol Improvements

Currently, the pedestrian experience along Avenida del Sol consists of traversing a narrow five-foot sidewalk between parked cars (parallel parked so that mirrors extend over the sidewalk) and a chain-link fence with surface parking on the other side. There is no view to the beach from this sidewalk until nearing the end of the street. The Amended Master Plan will create a completely different and significantly improved pedestrian experience with widened, eight-foot sidewalks. A broad, layered planting area will accent the new South Beach Guestroom building and soften the edge along the new sidewalk and new diagonal parking stalls. Beyond this 15-23-foot landscape buffer, the balconies and patios of the South Beach Guestroom building will provide human scale and activate the streetscape.

The inviting Victorian-esque architecture, in complement to the Historic Hotel, will draw visitors down the street and toward the ocean. Nearing the end of the street, views to the



**Sidewalk at Avenida del Sol From Orange Avenue
(looking towards beach/ocean)**

ocean will open up, and the sidewalk will connect with the Paseo beachfront walkway, realigned to provide better views to, and access to, the ocean.

To correct flooding problems which currently exist, and at the request of the City of Coronado, the Avenida del Sol cul-de-sac (a public street) will be raised from its current elevation of approximately 8 feet to approximately 13 feet at the highest point, while maintaining the entrance drive to the Coronado Shores complex at its current elevation. An access ramp will be provided near the end of the cul-de-sac for convenient pedestrian access to the beach.

This ramp will also allow for access by public safety vehicles. Additionally, new angled public beach parking will be added along Avenida del Sol.



Sidewalk at Avenida del Sol Approaching cul-de-sac

EXHIBIT B

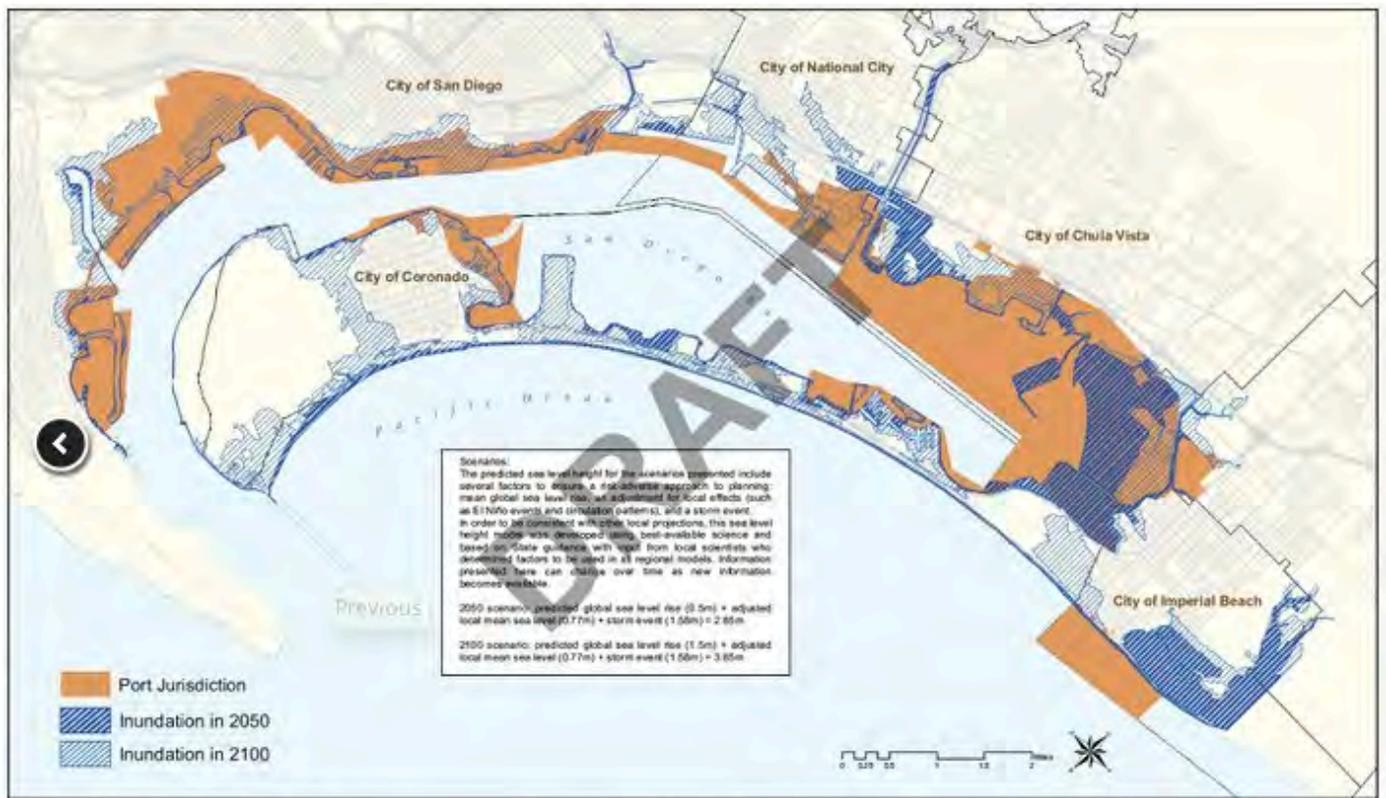


FIGURE # San Diego Bay Sea Level Rise in 2050 and 2100

Above: Projected sea level rise for San Diego Bay in 2050 and 2100.

EXHIBIT C

CALIFORNIA COASTAL COMMISSION

SAN DIEGO AREA
7575 METROPOLITAN DRIVE, SUITE 103
SAN DIEGO, CA 92108-4421
(619) 767-2370



Fri 6a

Filed: February 10, 2005
49th Day: March 31, 2005
180th Day: August 9, 2005
Staff: DL-SD
Staff Report: June 22, 2005
Hearing Date: July 13-15, 2005

REGULAR CALENDAR
STAFF REPORT AND PRELIMINARY RECOMMENDATION

Application No.: 6-04-140

Applicant: City of Coronado

Agent: Gary Orsa

Description: Demolition of an existing 30-foot high, 534 sq.ft. lifeguard tower and construction of a new 35-foot high, 1,050 sq.ft. lifeguard tower/station in the same location on Central Beach, and construction of a new 790 sq.ft. restroom facility on sandy beach at North Beach. The lifeguard station includes construction of a seawall west of the structure.

Site: Central Beach and North Beach, Coronado, San Diego County.

STAFF NOTES:

Summary of Staff's Preliminary Recommendation: Staff recommends approval of the project, with special conditions. The applicant has demonstrated that the proposed replacement lifeguard station is necessary at the proposed location and that its size and extent has been minimized to reduce its impact on views and public access. The new lifeguard station will be located in approximately the same location as the existing facility, but because the structure is larger, will result in almost 1,000 sq.ft. of additional beach coverage. However, the larger structure will accommodate a first aid station and related safety facilities that will provide improved public services. The vertical seawall proposed will provide reasonable and necessary protection for the coastal-dependent use while minimizing impacts to public access and shoreline processes. Special Conditions prohibit the addition of any future shoreline protection.

The proposed restrooms will also provide a public service to beach visitors. The structure has been sized and located appropriately to minimize encroachment on the beach and adverse impacts to public access and recreation. While the restroom is located on the sandy beach, it is located at the eastern extent of the beach, adjacent to the road. Special Conditions prohibit the construction of any shoreline protection for the restroom.

Other conditions prohibit the placement of advertising on the structures, restrict the color and appearance of the buildings, require pre- and post-construction water quality BMPs, address construction access and timing, and require State Lands Commission review.

Standard of Review: Chapter 3 polices of the Coastal Act, with the certified Coronado LCP used as guidance.

Substantive File Documents: Certified City of Coronado LCP; County Processes and Wave Runup Analyses by TerraCosta Consulting Group, Inc., 1/24/05; CDP #6-01-170.

I. PRELIMINARY STAFF RECOMMENDATION:

The staff recommends the Commission adopt the following resolution:

MOTION: *I move that the Commission approve Coastal Development Permit No. 6-04-140 pursuant to the staff recommendation.*

STAFF RECOMMENDATION OF APPROVAL:

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

RESOLUTION TO APPROVE THE PERMIT:

The Commission hereby approves a coastal development permit for the proposed development and adopts the findings set forth below on grounds that the development as conditioned will be in conformity with the policies of Chapter 3 of the Coastal Act. Approval of the permit complies with the California Environmental Quality Act because either 1) feasible mitigation measures and/or alternatives have been incorporated to substantially lessen any significant adverse effects of the development on the environment, or 2) there are no further feasible mitigation measures or alternatives that would substantially lessen any significant adverse impacts of the development on the environment.

II. Standard Conditions.

See attached page.

III. Special Conditions.

The permit is subject to the following conditions:

1. Final Plans. **PRIOR TO THE ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT**, the applicant shall submit to the Executive Director for review and written approval, final site plans for the proposed lifeguard tower and restrooms. The final plans shall be in substantial conformance with the plans by Munroe and Orsa Architects, Inc 11/29/04, and shall include the following notes:

- a) No advertising shall be permitted on the approved structures;
- b) Clocks, temperature displays, or other safety information may be located on the façade of the approved structures.
- c) Any fill material used during construction shall be clean, beach compatible material with no rubble, organics, or other debris.
- d) During construction of the approved development, disturbance to sand and intertidal areas shall be minimized to the maximum extent feasible. All excavated beach sand shall be redeposited on the beach. Local sand, cobbles or shoreline rocks shall not be used for backfill or for any other purpose as construction material.

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.

2. Protection of Water Quality - During Construction. **PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT**, the applicant shall submit for the review and approval of the Executive Director, a Construction Best Management Practices Plan for the 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 practicable the adverse impacts associated with construction to receiving waters. The applicant shall implement the approved Construction Best Management Practices Plan on the project sites prior to and concurrent with the project staging, demolition and construction operations. The BMPs shall be maintained throughout the development process.

A. Said plan shall include the following requirements:

- (i) No construction materials, debris, or waste shall be placed or stored in a manner where it may be subject to wave, wind, rain, or tidal erosion and dispersion.

(ii) Any and all refuse and debris resulting from construction and demolition activities shall be removed from the project site within 72 hours of completion of demolition and construction. Construction and demolition debris and sediment shall be removed from or contained and secured within work areas each day that construction or demolition occurs to prevent the accumulation of sediment and other debris that could be discharged into coastal waters. All demolition/construction debris and other waste materials removed from the project site shall be disposed of or recycled in compliance with all local, state and federal regulations. No debris or other waste materials shall be placed in coastal waters or be allowed to move into coastal waters. If a disposal site is located in the coastal zone, a coastal development permit or an amendment to this permit shall be required before disposal can take place.

(iii) No storage of mechanized equipment is allowed on the beach.

(iv) Erosion control/sedimentation Best Management Practices (BMPs) shall be used to control dust and sedimentation impacts to coastal waters during construction and demolition activities. BMPs shall include, but are not limited to: placement of sand bags around drainage inlets to prevent runoff/sediment transport into the storm drain system and Pacific Ocean

(v) All construction materials, excluding lumber, shall be covered and enclosed on all sides, and kept as far away from a storm drain inlet and receiving waters as possible.

B. The required Construction Best Management Practices Plan for the project site shall also include the following BMPs designed to prevent spillage and/or runoff of construction and demolition-related materials, sediment, or contaminants associated with construction activity. The applicant shall:

(i) Develop and implement spill prevention and control measures and shall ensure the proper handling, storage, and application of petroleum products and other construction materials. These shall include a designated fueling and vehicle maintenance area with appropriate berms and protection to prevent any spillage of gasoline or related petroleum products or contact with runoff. The fueling and maintenance area shall be located as far away from the receiving waters and storm drain inlets as possible and shall not be located on the beach if at all possible. If fueling or maintenance is proposed to be on the beach then the applicant shall submit a plan showing how there is essentially no possibility of contaminating beach materials through those operations.

(ii) Maintain and wash equipment and machinery in confined areas specifically designed to control runoff. Thinners or solvents shall not be discharged into sanitary or storm sewer systems. Washout from concrete trucks shall be disposed of at a controlled location not subject to runoff into coastal waters, and more than fifty feet away from a storm drain, open ditch or surface waters.

- (iii) Provide and maintain adequate disposal facilities for solid waste, including excess concrete, produced during construction.
- (iv) Provide and maintain temporary sediment basins (including debris basins, desilting basins or silt traps), temporary drains and swales, sand bag barriers, wind barriers such as solid board fence or hay bales, and silt fencing.
- (v) Stabilize any stockpiled fill with geofabric covers or other appropriate cover, and close and stabilize open trenches as soon as possible.
- (vi) Prior to final inspection of the proposed project the applicant shall ensure that no gasoline, lubricant, or other petroleum-based product was deposited on the beach or at any beach facility. If such residues are discovered, the residues and all contaminated sand shall be reported to the Executive Director in order to determine if the removal and disposal of the contaminated matter shall require a permit amendment pursuant to the requirements of the Coastal Act and the California Code of Regulations.

The Construction Best Management Practices Plan approved by the Executive Director pursuant to this condition shall be attached to all final construction plans. The permittee shall undertake the approved development in accordance with the Construction Best Management Practices Plan approved by the Executive Director pursuant to this condition. Any proposed changes to the approved Construction Best Management Practices Plan shall be reported to the Executive Director in order to determine if the proposed change shall require a permit amendment pursuant to the requirements of the Coastal Act and the California Code of Regulations. No changes to the approved plan shall occur without a Commission amendment to this coastal development permit unless the Executive Director determines that no amendment is legally required.

3. Protection of Water Quality - Project Design & Post Construction. **PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT**, the applicant shall submit for the review and approval of the Executive Director, a Water Quality Management Plan (WQMP) for the post-construction project site, prepared by a licensed water quality professional, and shall incorporate structural and non-structural Best Management Practices (BMPs) designed to reduce, to the maximum extent practicable, the volume, velocity and pollutant load of storm water and nuisance flow leaving the developed site. The plan shall be in conformance with the following requirements:

A. Water Quality Goals.

- (i) Appropriate structural and non-structural BMPs shall be designed to treat, infiltrate, or filter the runoff from all surfaces and activities on the development site, without the construction of drain outlets onto the beach.
- (ii) If the applicant uses post-construction structural BMPs (or suites of BMPs), they should be designed to treat, infiltrate or filter the amount of storm water runoff produced by all storms up to and including the 85th percentile, 24-hour

storm event for volume-based BMPs, and/or the 85th percentile, 1-hour storm event, with an appropriate safety factor (i.e., 2 or greater), for flow-based BMPs.

(iii) Runoff from all parking areas, maintenance areas, and driveways shall be collected and directed through a system of appropriate structural and/or non-structural BMPs. The filter elements shall be designed to 1) trap sediment, particulates and other solids and 2) remove or mitigate contaminants through filtration and/or biological uptake. The drainage system shall also be designed to convey and discharge runoff in excess of this standard from the building site in a non-erosive manner.

B. Monitoring and Maintenance

All BMPs shall be operated, monitored, and maintained for the life of the project and at a minimum, all structural BMPs shall be inspected, cleaned-out, and where necessary, repaired, at the following minimum frequencies: 1) prior to October 15th each year; 2) during each month between October 15th and April 15th of each year and, 3) at least twice during the dry season (between April 16 and October 14).

(i) Debris and other water pollutants removed from structural BMP(s) during clean-out shall be contained and disposed of in a proper manner.

(ii) All inspection, maintenance and clean-out activities shall be documented in an **annual report** submitted to the Executive Director no later than June 30th of each year. This report shall be submitted for the first three years following the completion of development.

(iii) It is the applicant's responsibility to maintain the drainage system and the associated structures and BMPs according to manufacturer's specification.

The permittee shall undertake and maintain the approved development in accordance with the Water Quality Management Plan approved by the Executive Director pursuant to this condition. Any proposed changes to the approved Water Quality Management Plan shall be reported to the Executive Director in order to determine if the proposed change shall require a permit amendment pursuant to the requirements of the Coastal Act and the California Code of Regulations. No changes to the approved plan shall occur without a Commission amendment to this coastal development permit unless the Executive Director determines that no amendment is legally required.

4. Storage and Staging Areas/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 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 public parking spaces.

- b) Access corridors shall be located in a manner that has the least impact on public access to and along the shoreline via Ocean Boulevard. Beach access at Central Beach and North Beach shall remain open during construction.
- c) No work shall occur on the beach 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.

5. Exterior Treatment. **PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT AMENDMENT**, the applicant shall submit for the review and approval in writing of the Executive Director, a final color board or other indication of the exterior materials and color scheme to be utilized in the construction of the proposed lifeguard tower and restrooms, in substantial conformance with the colored plans dated 11/29/04 by Munroe and Orsa Architects, Inc. The color of the structures and roofs permitted hereby shall be restricted to colors compatible with the surrounding environment with no bright tones except as minor accents. All windows shall be comprised of non-glare glass.

The permittee shall undertake the development in accordance with the color board. Any proposed changes to the approved color board shall be reported to the Executive Director. No changes to the color board that result in either building taking on a substantially different appearance inconsistent with the surrounding environment 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. State Lands Commission Review. **PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT**, the applicant shall obtain a copy of written authorization to construct the proposed development from the State Lands Commission.

7. Assumption of Risk, Waiver of Liability and Indemnity Agreement

A. By acceptance of this permit, the applicant acknowledges and agrees (i) that the site may be subject to hazards from waves, storm waves, flooding and erosion; (ii) to assume the risks to the applicant and the property that is the subject of this permit of injury and damage from such hazards in connection with this permitted development; (iii) to unconditionally waive any claim of damage or liability against the Commission, its officers, agents, and employees for injury or damage from such

hazards; and (iv) to indemnify and hold harmless the Commission, its officers, agents, and employees with respect to the Commission's approval of the project against any and all liability, claims, demands, damages, costs (including costs and fees incurred in defense of such claims), expenses, and amounts paid in settlement arising from any injury or damage due to such hazards.

B. PRIOR TO ANY CONVEYANCE OF THE PROPERTY THAT IS THE SUBJECT OF THIS COASTAL DEVELOPMENT PERMIT, the applicant shall execute and record 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 (hereinafter referred to as the "Standard and Special Conditions"); and (2) imposing all Standard and Special Conditions of this permit as covenants, conditions and restrictions on the use and enjoyment of the Property. The restriction shall include a legal description of the applicant's entire parcel or parcels. It shall also indicate that, in the event of an extinguishment or termination of the deed restriction for any reason, the Standard and Special 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.

C. PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicant shall submit a written agreement, in a form and content acceptable to the Executive Director, incorporating all of the above terms of this condition.

8. No Future Seaward Extension of Shoreline Protective Device: Lifeguard Tower

A. By acceptance of this Permit, the applicant agrees, on behalf of itself (or himself or herself, as applicable) and all successors and assigns, that no future repair or maintenance, enhancement, reinforcement, or any other activity affecting the shoreline protective device for the lifeguard tower approved pursuant to Coastal Development Permit No. 6-04-140, as described and depicted on an Exhibit attached to the Notice of Intent to Issue Permit (NOI) that the Executive Director issues for this permit, shall be undertaken if such activity extends the footprint seaward of the subject shoreline protective device. By acceptance of this Permit, the applicant waives, on behalf of itself (or himself or herself, as applicable) and all successors and assigns, any rights to such activity that may exist under Public Resources Code Section 30235.

B. Prior to the issuance by the Executive Director of the **NOI FOR THIS PERMIT**, the applicant shall submit for the review and approval of the Executive Director, and upon such approval, for attachment as an Exhibit to the NOI, a formal legal description and graphic depiction of the shoreline protective device approved by this permit, as generally described above and shown on Exhibit #5 attached to this staff report, showing the footprint of the device and the elevation of the device referenced to NGVD (National Geodetic Vertical Datum).

9. No Future Bluff or Shoreline Protective Device: Restroom

A. By acceptance of this Permit, the applicant agrees, on behalf of itself (or himself or herself, as applicable) and all successors and assigns, that no bluff or shoreline protective device(s) shall ever be constructed to protect the restrooms approved pursuant to Coastal Development Permit No. 6-04-140 including, but not limited to, the building, walkway, apron, and shower area in the event that the development is threatened with damage or destruction from waves, erosion, storm conditions, bluff retreat, landslides, or other natural hazards in the future. By acceptance of this Permit, the applicant hereby waives, on behalf of itself (or himself or herself, as applicable) and all successors and assigns, any rights to construct such devices that may exist under Public Resources Code Section 30235.

B. By acceptance of this Permit, the applicant further agrees, on behalf of itself (or himself or herself, as applicable) and all successors and assigns, that the landowner shall remove the development authorized by this Permit, including the surrounding walkways, if any government agency has ordered that the structures are not to be occupied due to any of the hazards identified above.

IV. Findings and Declarations.

The Commission finds and declares as follows:

1. Detailed Project Description/Site History. The project consists of demolition and replacement of the City of Coronado's existing lifeguard tower/station, and construction of a new restroom facility. The existing, 3-story, approximately 30-foot high, 534 sq.ft. tower is located on Central Beach, seaward of the intersection of Ocean Boulevard and Isabella Street, approximately 280 feet seaward of the existing rock revetment along Ocean Boulevard. The new 1,189 sq.ft. tower would consist of a main tower approximately 35 feet high at roof top, with an approximately 6-foot high antenna, and a 17-foot high secondary building, also with an antenna, attached to the landward side of the proposed tower. A 1,323 sq.ft. concrete apron would surround the building. A new, partially buried seawall would be located on the seaward side of the apron. The seawall would extend approximately 36 inches above the proposed concrete apron.

The new tower would be located in approximately the same area as the existing lifeguard tower; however, because the footprint of the new structure is much larger, the new building and apron would extend approximately 24 feet further seaward. The footprint of the existing lifeguard tower, including the structure and the surrounding concrete apron is approximately 1,059 sq.ft. The footprint of the proposed facility, including the new building and apron, would be approximately 2,027.

The proposed new 11-foot high, 790 sq.ft. restroom facility would be located on sandy beach at North Beach, just southeast of the existing beach accessway at the intersection of Ocean Drive and Ocean Boulevard, seaward of the existing revetment. The building would consist of a men's restroom, a women's restroom, two family restrooms, and a

outdoor shower/rinse off area. Also proposed is an approximately 1,425 sq.ft. concrete apron surrounding the building and an approximately 1,713 sq.ft. walkway from the existing sidewalk to the restrooms. The proposed restrooms would replace the “portapotties” currently located at Sunset Park, across the street from North Beach.

The existing lifeguard tower was constructed in 1968 and is located approximately 280 feet seaward of the Ocean Boulevard revetment. In January 1999, the Commission approved the widening and extension of the walkway between the stairway and the existing lifeguard tower (6-98-130), and in March 2001, the Commission approved replacement of the third story of the lifeguard tower and interior remodeling and upgrading of the first two stories (6-01-004). A 2001 inspection of the tower determined that the masonry wall construction had weakened to the point where the facility was determined to be unsafe and the tower was condemned and abandoned. The inspection was not able to determine if the damage to the tower walls was the result of age or high tides and waves experienced during the 1982 El Niño storms.

The proposed lifeguard tower and restroom are two of three new structures currently being proposed on Central and North Beach. The third structure is a new 2,574 sq.ft., 11’9” high lifeguard public safety service building at Central Beach adjacent to the rock revetment landward of the existing/proposed lifeguard tower (6-05-026). These applications are being reviewed by the Commission on the same agenda in order to assess the cumulative impacts of the proposed new construction on the beach.

The City of Coronado has a fully certified Local Coastal Program (LCP) and issues its own coastal development permits. However, Central Beach is operated by the City of Coronado under a lease from the State Lands Commission (Lease #PRC 3691.1). Because the site is located on State tidelands, the site is under the Commission's original jurisdiction and has been designated as such on the City of Coronado's Post-Certification and Appeals Map. Therefore, Chapter 3 of the Coastal Act is the standard of review. The State Lands Commission is currently in the process of reviewing the project for consistency with the terms of the City's lease. Special Condition #6 requires that the City submit evidence of State Lands approval prior to issuance of the permit.

2. Shoreline Protection/Public Access. The following sections of the Coastal Act are applicable to the proposed project and state, in part:

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 the public safety needs and the need to protect public rights, rights of private property owners, and natural resources 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 30235

Revetments, breakwaters, groins, harbor channels, seawalls, cliff retaining walls, and other such construction that alters natural shoreline processes shall be permitted when required to serve coastal-dependent uses or to protect existing structures or public beaches in danger from erosion, and when designed to eliminate or mitigate adverse impacts on local shoreline sand supply...

Section 30253

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...

Section 30604 (c) of the Coastal Act requires that in order to issue a coastal development permit for any development between the sea and the nearest public road paralleling the sea, the Commission must specifically find that the permitted development is in conformity with the public access and recreation policies of Chapter 3 of the Coastal Act. In this case, as conditioned, such a finding can be made.

The proposed lifeguard tower includes a partially buried seawall located on the seaward side of the new concrete apron. The seawall would extend approximately 36 inches above the proposed concrete apron, and would be dug down into the Bay Point Formation below the sand. No toestone or riprap is proposed on the seaward side of the structure.

No seawall is proposed in associated with the restrooms. A 3-foot 8-inch masonry wall around the rinse off area would be located seaward of the building. No toestone or riprap is proposed on the seaward side of the structure.

Both the replacement lifeguard tower and the new restrooms represent potential conflicts with the shoreline protection, public access, and recreation policies of the Coastal Act. While the Commission certainly recognizes the important function of a lifeguard tower and restrooms for the beach-going public, the structures must be located and designed to reduce impacts on public access and shoreline sand supply. There are several ways in which the proposed structures could have an adverse impact on these coastal resources.

The buildings would interfere directly with public access by occupying beach area that would otherwise be available for public use.

The second effect is that any hard structure on the beach, like a building or shoreline protective device can have adverse impacts on sand supply. Coastal Act Section 30235 acknowledges that seawalls, revetments, cliff retaining walls, groins and other such structural or “hard” solutions alter natural shoreline processes. Shoreline protective devices can result in a number of adverse effects on the dynamic shoreline system and the public's beach ownership interests. First, shoreline protective devices can cause changes in the shoreline profile, particularly changes in the slope of the profile resulting from a reduced beach berm width. This may alter the usable area available to the public seaward of the structure. A beach that rests either temporarily or permanently at a steeper angle than under natural conditions will have less horizontal distance between the mean low water and mean high water lines. This reduces the actual area in which the public can pass on public property.

The second effect of a shoreline protective device (or other hard structure) on access is through a progressive loss of sand as the natural shore material is not available to nourish offshore sand bars. The lack of an effective bar can allow such high wave energy on the shoreline that materials may be lost far offshore where it is no longer available to nourish the beach. A loss of sandy beach area is a significant adverse impact on public access to the beach.

Third, shoreline protective devices such as revetments and bulkheads can cumulatively affect shoreline sand supply and public access by causing accelerated and increased erosion on adjacent public beaches. This effect may not become clear until such devices are constructed individually along a shoreline and they reach a public beach. In the case of the proposed development, Central and North Beach are very wide sandy beaches. However, the width of the beach can vary after severe storm events. The Commission notes that if a seasonal eroded beach condition occurs with greater frequency due to the placement of a shoreline protective device on the subject site, then the subject beach would also accrete at a slower rate. The Commission also notes that many studies performed on both oscillating and eroding beaches have concluded that loss of beach occurs on both types of beaches where a shoreline protective devices or other hard structures exists.

Fourth, if not sited in a landward location that ensures that the seawall is only acted upon during severe storm events, beach scour during the winter season will be accelerated because there is less beach area to dissipate the wave's energy. Finally, as noted, revetments, bulkheads, seawalls and other hard structures interfere directly with public access by their occupation of beach area that will not only be unavailable during high tide and severe storm events, but also potentially throughout the winter season.

Shoreline protection devices are required to be approved only when necessary to protect coastal-dependent uses, existing structures, or public beaches in danger from erosion and when designed to eliminate or mitigate adverse impacts on local sand supply. The Coastal Act does not require the Commission to approve shoreline altering devices to

protect vacant land or in connection with requests to construct new development that is not a coastal-dependent use. A shoreline protective device proposed in those situations is likely to be inconsistent with various Coastal Act policies. For example, Section 30253 addresses new development and requires that it be sited to lessen the risks due to hazards. In this case those risks are from waves, storm events, erosion and flooding.

Thus, while the Commission certainly recognizes the important function of a lifeguard tower and restrooms for the beach-going public, the structures must be the minimum size necessary, and located and designed to reduce impacts on public access and shoreline sand supply.

Need for Facility/Alternatives Analysis.

The proposed lifeguard tower would be located in the same area as the existing lifeguard tower, although the larger building would extend approximately 24 feet closer to the water. The location of the proposed (and existing) tower was determined by the need to be near the water to view swimmers and to direct lifeguards to areas of need. Most of the sandy beach cannot be accessed directly because of the substantial rock revetment along the inland extent of the beach. The tower location is on the southern portion of Central Beach, but it is across from the main entry point to the majority of the beach, and is centrally located enough that the both the northern and southern extent of the beach can be accessed quickly. The only existing permanent public restrooms on the beach are also sited at this location. The City has stated that because of its central location, the tower functions as a command center to direct safety staff to points of need and is the first point of contact by those seeking medical aid.

Since the existing tower's closure, lifeguard staff have used temporary towers. However, the City has indicated that these structures are not tall enough to adequately observe the water for the area under the City's responsibility. They are also inadequate, do not provide the minimum of first aid care and the office space is elevated and therefore not accessible to all of the public.

The main difference between the existing, condemned tower and the proposed lifeguard tower is the size of the first floor. The existing lifeguard tower is three stories high, each story approximately 178 sq.ft. in size, plus a 196 sq.ft. observation deck. The proposed tower will have a 704 sq.ft. first floor, a 173 sq.ft. second floor, a 173 sq.ft. third floor, and a 208 sq.ft. observation deck.

The City has indicated that there are several reasons for the increased tower size. The proposed lifeguard tower would provide access to the upper two floors (where a workstation and the observation area are located) by use of a stairway. The existing tower uses a ladder to access the two upper floors, which occupies less space than a stairway, but is more hazardous. Most significantly, the existing tower was constructed in 1968. The City notes that, unlike today, first aid services and lifeguard medical training was limited at that time, and the existing tower has extremely limited first aid facilities. At the time the tower was constructed, beach visitors also numbered about

20,000 people per year. Current figures are upward of 2,000,000 visitors per year. With population growth, the expectation is that these numbers will increase.

Due to the increases in public attendance, the first aid needs have overwhelmed the capacity of the existing tower to adequately treat the variety of injuries or accommodate the equipment needed to administer health care and deal with biological and medical waste. Therefore, the first floor of the tower has been increased 526 feet to accommodate a first aid station designed to treat a variety of patient needs from hypothermia, stingray wounds, cuts and abrasions, broken bones, eye injuries, near drowning and seizures. The facility includes a toilet room, a shower for treating hypothermia patients, a sink for hand washing, a cot area to allow patients to lie down, and medical supply storage for both the first aid room and to re-supply the mobile units assigned to the beach. The City has indicated that health codes require a number of these functions to be provided based on the level of care provided and to conform to the treatment of blood borne pathogens.

Originally, a much larger building footprint was proposed to house of the lifeguard equipment, lockers, and offices. The City determined that this would result in an unnecessarily bulky structure, and these functions have been relocated to the proposed public safety service building referenced above (CDP #6-05-26). The only functions to remain at the building are observation and first aid, which the City considers the minimum necessary for this site.

There is a narrow concrete apron around the existing tower that would be expanded for the proposed tower. The City has stated that the apron provides a buffer to keep sand from entering the building, which is important in general housekeeping, but also keeps the first aid space more sanitary. Second, the apron is used to treat overflow patients in the event of a swarm of injuries. The City has indicated that on a summer day, stingray injuries have occurred as frequently as 10-12 an hour. Treatment consists of soaking the wound in hot water for along as possible, but a minimum of 20 minutes. Having an overflow space allows the first aid space to be freed up to do triage and treat more severe cases until they can be transported.

In this particular case, the replacement lifeguard facility will continue to provide an important public safety function with expanded public health services. The building will be located where required to be functionally adequate, and the proposed structure is reasonably sized to accommodate the public safety needs of the area and the population being served.

With regard to the proposed new restrooms at North Beach, North Beach is another main entrance to the beach. From this point, visitors can access the main beach area to the south or dog beach to the north. It is also located adjacent to Sunset Park across the street. As noted, currently the only permanent restroom facilities on the beach are at Central Beach near the lifeguard tower, with "portapotties" located at Sunset Park across the street. The rock revetment is more than 6 feet above street level at North Beach, and there are no ocean views except at the entryway. The City has stated that the location of the restroom on the seaward side of the revetment was chosen as the only place in the vicinity where the structure could be concealed from public views.

The proposed restrooms would provide a much needed beach amenity at the northern portion of the beach. Again, the Commission must weigh the benefit of new recreational support facility against the loss of sandy beach area that would result from the new construction. As noted, the only existing permanent beach restrooms are near the lifeguard tower at Central Beach, approximately ¼ mile south of the North Beach access point. The area is heavily used by people going to North Beach and is also the entry to Dog Beach, located north of the site. There are also fire rings at North Beach.

The proposed restroom site is directly across the street from Sunset Park, a 3-acre park consisting of grassy turf, a small play area, and “portapotties”. The restroom could be sited at the park, which would avoid the need to take up beach area. However, at this particular site, there is considerably more beach area than grass area. Coronado beaches are among the widest in the County, and even in the winter, it can be a considerable hike from the water’s edge to the revetment and sidewalk. The restroom has been designed to be low profile so it is not visible from the street, but it will be visible from the beach, and obviously by people walking by to access the water. Convenient restrooms provide not only a recreational amenity, but also a water quality improvement, as formal restrooms facilities provide beachgoers an alternative to using the ocean. It is reasonable to assume that beachgoers positioned near the water would be far less likely to make use of restrooms located out of sight, across the street in Sunset Park, than they would be to use a facility located at the proposed site seaward of the revetment. Thus, in this particular case, siting the proposed restrooms on the beach is consistent with the public access and recreation policies of the Coastal Act.

Special Conditions

The proposed project would replace an existing lifeguard tower with a new facility better equipped to serve the public. Since in this particular case, the replacement tower must necessarily be located in area subject to wave action in order to function effectively, the project includes construction of a vertical seawall. The Commission’s coastal engineer has also reviewed the proposed project and submitted technical reports and concurs that a seawall is needed. The Commission recognizes the necessity of the proposed development for public safety purposes and in this particular case finds that, if the impacts on shoreline sand supply, public access and visual resources can be reduced to the maximum extent possible, its siting on the beach and further seaward encroachment can be found consistent with the Coastal Act.

It is important that the proposed seawall be designed to adequately protect the lifeguard tower to ensure that in the future, it is not necessary to add additional protection to the site, such as riprap or a larger wall, which would result in more encroachment on the beach and impacts to coastal resources. Adequate shoreline protection also reduces the chance that rubble and debris will be deposited on the beach from a damaged structure. The Commission’s engineer has reviewed the project and concluded that as proposed, the seawall has been designed to be adequate to protect the proposed structure from storms and wave action. Special Condition #8 requires the City to waive any rights to additional protection in the future that would increase the seaward extent of the seawall. If, in the

future, the shoreline protection is damaged or fails to protect the tower, the City should apply for a new permit or amendment to this permit to repair or rebuild the seawall in a manner that does not require additional encroachment on the beach.

The geotechnical report discusses possibly importing fill material for the foundations so they will be able to resist liquefaction impacts and possible differential settlement. Special Condition #1 requires that if there is soil importation, then it should be clean, beach compatible material with no rubble, organics, or other debris.

Siting the proposed restrooms on the beach is consistent with the public access and recreation policies of the Coastal Act. The minimal amount of beach encroachment involved is offset by the public benefits associated with the restrooms. However, only this minimal amount of encroachment is appropriate. Unlike the lifeguard tower, the restroom does not have to be located on the beach to serve its function. The structure has been located as far inland as possible, and given the width of Coronado's beaches, is unlikely to be damaged by waves or storm action. The geotechnical studies submitted with the project indicate the site is likely to be subject to wave action only during extreme storm events. If, however, beach conditions were ever to change so drastically that in order to maintain the structure, shoreline protection such as riprap or other permanent armoring that could impact coastal resources was required, the structure could, and should be relocated. If the beach were ever so narrow that the restrooms were subject to regular wave action, providing open beach area would likely be a higher priority than restrooms, and at that point, beach use would probably have lessened considerably, reducing the value of support facilities such as restrooms.

Therefore, Special Condition #9 requires the City to waive all rights to construct shoreline protection for the restrooms. If the restrooms are threatened in the future, the City should consider removal and relocation of the restrooms the feasible alternative to the construction of shoreline protection.

The beach is a heavily utilized recreational amenity, and construction activities during the busy summer months when beach attendance is at its greatest demand would significantly impact public access at this location. Special Condition #4 restricts construction activities from occurring during the peak beach use season (from Memorial Day through Labor Day). The condition also requires that the accessways at Central and North Beach remain open throughout construction.

Although the Commission finds that the proposed project has been designed to minimize the risks associated with its implementation, the Commission also recognizes the inherent risk of shoreline development. The lifeguard tower will be subject to wave action, and the restroom may on occasion be struck by waves. Thus, there is a risk of damage to the structure or damage to property as a result of wave action. Given that the applicants have chosen to construct the structure despite these risks, the applicants must assume the risks. Accordingly, Special Condition #7 requires that the City acknowledge the risks associated with the development and that indemnifies the Commission against claims for damages that may be brought by third parties against the Commission as a result of its approval of this permit.

Conclusion

The proposed lifeguard station and public restrooms are valuable safety and recreational facilities that will enhance the beach-going experience for visitors. The structures have been sized and located appropriately to maximize their effectiveness and minimize encroachment on the beach and adverse impacts to public access and recreation. Although a seawall is proposed to protect the lifeguard tower, the structure must be located in the proposed area in order to function, and the shoreline protection has been designed to minimize impacts to public access, recreation, and shoreline sand supply. As proposed and conditioned, neither the lifeguard facility nor the restrooms will require or result in additional beach encroachment in the future for shoreline protection. Prohibiting construction during summer will minimize recreational impacts. Therefore, as conditioned, the proposed project can be found consistent with the public access, recreation, and shoreline protection policies of the Coastal Act.

3. Public Views. Section 30251 of the Coastal Act is applicable to the subject project and states, in part:

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...

As described above, the proposed replacement lifeguard tower would be located in approximately the same area as the existing lifeguard tower; however, because the footprint of the new structure is much larger, the new building and apron would extend approximately 24 feet further seaward. The footprint of the existing lifeguard tower, including the structure and the surrounding concrete apron is approximately 1,059 sq.ft. The footprint of the proposed facility, including the new building and apron, would be approximately 2,027. To accommodate larger first aid facilities, the first story of the new tower would be significantly larger than that of the existing tower, and will be designed to look like an attached distinct structure.

In addition, the proposed building will be approximately 5 feet higher than the existing building. However, the building is higher only in the roofline; the floor heights will be the same as the existing tower. The City has indicated that after extensive public testimony and redesign, the slope of the proposed roofline was pitched higher for aesthetic reasons to more closely match the nearby Hotel del Coronado. The buildings original square shape was also revised through the public review process as an octagon. This is intended to narrow the profile of building when viewed from different angles, as the corners are cut off to form the octagon.

There is no question that the new tower will be a prominent feature on the beach. However, lifeguard towers are a typical, expected feature on an urban beach, and because of the public services provided therein, should be fairly visible. The two-building design

of the new tower will appear larger than the existing tower, but given the building's location on the middle of a wide-open sandy beach, a somewhat larger, taller building is not going to substantially change the character of the beach or block any new significant public views.

The proposed restrooms would be tucked up against the existing revetment along Ocean Avenue, and would not be visible from the street. The City has indicated that the color scheme of both the restrooms and the lifeguard tower was chosen to make the structures as inconspicuous as possible. The proposed color of the base of the tower is a sandy beige, and the tower rooftops would be a stained greenish copper metal. The proposed restroom would be faced with stone veneer to blend in with the adjacent riprap.

Special Condition #5 requires that that the City maintain the exterior of the structures with colors and materials compatible with the surrounding environment. During the local hearing process, the City considered decorating the tower with artistic tiles, although this design feature was not ultimately chosen. Special Condition #5 would accommodate minor changes to the façade of the buildings as long as neither building took on a substantially different appearance inconsistent with the surrounding environment. Special Condition #1 prohibits the placement of advertising on the buildings. Clocks, temperature displays, or other public safety or informational displayed would be allowed.

In conclusion, the proposed buildings have been designed to blend in with the surrounding landscape and be as unobtrusive as feasible. As conditioned, no adverse visual impacts will result. Therefore, the Commission finds that the proposed development is consistent with Section 30251 of the Coastal Act.

4. Water Quality. The following sections of the Coastal Act are applicable to the proposed development and state:

Section 30230

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

Section 30231

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.

Section 30232

Protection against the spillage of crude oil, gas, petroleum products, or hazardous substances shall be provided in relation to any development or transportation of such materials. Effective containment and cleanup facilities and procedures shall be provided for accidental spills that do occur.

Sections 30230, 30231 and 30232 of the Coastal Act require that marine resources be maintained, enhanced, and restored in a manner that will sustain the biological productivity of all species of marine organisms in coastal waters, and that the biological productivity and water quality of coastal waters be maintained and restored by controlling polluted runoff.

The lifeguard and restroom sites would be located directly on the beach. Pollutants such as sediments, toxic substances (e.g., grease, motor oil, heavy metals, and pesticides), bacteria, and trash and particulate debris are often contained within urban runoff entering via the storm water system or directly into the ocean. The discharge of polluted runoff into the ocean would have significant adverse impacts on the overall water quality of the ocean.

Construction activities may have an adverse effect on water quality in a number of ways. For example, the storage or placement of construction materials, debris, or waste in a location subject to erosion and dispersion or which may be discharged into coastal water via rain, surf, tide, or wind would result in adverse impacts upon the marine environment that would reduce the biological productivity of coastal waters. For instance, construction debris entering coastal waters may cover and displace soft bottom habitat. In addition, the use of machinery not designed for use in coastal waters may result in the release of lubricants or oils that are toxic to marine life. Sediment discharged to coastal waters may cause turbidity, which can shade and reduce the productivity of foraging avian and marine species' ability to see food in the water column. In order to avoid adverse construction-related impacts upon marine resources, Special Condition #2 outlines construction-related requirements to provide for the safe use and storage of construction materials and the safe disposal of construction debris.

This condition requires the applicant to submit a Construction Best Management Practice Plan. In addition, Special Condition #2 requires the implementation of Best Management Practices designed to prevent spillage and/or runoff of construction-related materials, sediment, or contaminants associated with construction activity prior to the onset of construction. Such measures include, in part, proper handling, storage, and application of petroleum products and other construction materials; maintaining and washing equipment and machinery in confined areas specifically designed to control runoff; and stabilizing any stockpiled fill with geofabric covers or other appropriate cover.

The proposed project will result in an increase in impervious surfaces. Currently, water runoff sheet flows onto the beach and into the ocean. Since the existing lifeguard tower was constructed decades ago, the project site is lacking in water quality measures to treat or filtrate storm water runoff that leaves the site and enters the coastal waters.

The discharge of these pollutants to coastal waters can cause cumulative impacts that reduce the biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes and reduce optimum populations of marine organisms and have adverse impacts on human health. Therefore, in order to find the proposed development consistent with the water and marine resource policies of the Coastal Act, Special Condition #3 requires the incorporation of Water Quality Management Plan designed to treat, infiltrate, or filter the runoff from all surfaces and activities on the development site. The Water Quality Best Management Plan requires the implementation of appropriate Best Management Practices for the project including restrooms and driveways associated with the lifeguard station. The amount of additional impervious surface created by the proposed development is fairly small, so the condition allows the applicant to select structural BMPs, non-structural BMPs, or some combination of both. Critical to the successful function of any post-construction structural BMPs in removing pollutants in storm water is the application of appropriate design standards for sizing BMPs. The majority of runoff is generated from small storms because most storms are small in scale. Additionally, storm water runoff typically conveys a disproportionate amount of pollutants in the initial period that runoff is generated during a storm event. Designing BMPs for the small, more frequent storms, rather than for the large infrequent storms, results in improved BMP performance at lower cost. Therefore, any post-construction structural BMPs (or suites of BMPs) should be designed to treat, infiltrate or filter the amount of storm water runoff produced by all storms up to and including the 85th percentile, 24-hour storm event for volume-based BMPs, and/or the 85th percentile, 1-hour storm event, with an appropriate safety factor (i.e., 2 or greater), for flow-based BMPs.

Special Condition #3 requires that all BMPs be operated, monitored, and maintained for the life of the project and at a minimum, any structural BMPs shall be inspected, cleaned-out, and when necessary, repaired at the following minimum frequencies: (1) prior to October 15th each year; (2) during each month between October 15th and April 15th of each year and, (3) at least twice during the dry season. Debris and other water pollutants removed from filter device(s) during clean-out shall be contained and disposed of in a proper manner. Special Condition #2 also requires the applicant to dispose of all demolition and construction debris at an appropriate location outside of the coastal zone and informs the applicant that use of a disposal site within the coastal zone will require an amendment or new coastal development permit. The Commission's water quality staff have reviewed the project and the special conditions and determined that as conditioned, the project will protect marine resources and coastal waters.

Therefore, as conditioned to comply with construction related requirements, dispose of all debris at an approved disposal site, incorporate and maintain Best Management Practices during construction and after construction, and forbid the use of structures

containing petroleum based material, the proposed project can be found consistent with the water quality provisions of the Coastal Act.

5. Local Coastal Planning. The City of Coronado has a certified LCP and has assumed permit-issuing authority for the majority of the City, all of which is in the coastal zone. The site of the subject proposal, however, is located in an area that is subject to the Commission's original permit jurisdiction because it is located on public trust lands. Thus, Chapter 3 of the Coastal Act is the standard of review. The subject site is designated "beach" in Coronado's certified LCP. As discussed above and as conditioned, the proposed lifeguard tower and restroom can be found consistent with this designation. Therefore, the Commission finds the proposed development will not prejudice the ability of the City of Coronado to continue implementation of its certified LCP.

6. 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 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.

As previously discussed, the proposed project will not cause significant adverse impacts to the environment. The project, as conditioned, is consistent with the shoreline protection, public access, recreation, visual protection and water quality policies of the Coastal Act. As conditioned, there are no feasible alternatives or mitigation measures available which would substantially lessen any significant adverse impact which the activity might have on the environment. Therefore, the Commission finds that the proposed project, as conditioned, is the least environmentally damaging feasible alternative and is consistent with the requirements of the Coastal Act to conform to CEQA.

STANDARD CONDITIONS:

1. Notice of Receipt and Acknowledgment. The permit is not valid and development shall not commence until a copy of the permit, signed by the permittee or authorized agent, acknowledging receipt of the permit and acceptance of the terms and conditions, is returned to the Commission office.
2. Expiration. If development has not commenced, the permit will expire two years from the date on which the Commission voted on the application. Development shall be pursued in a diligent manner and completed in a reasonable period of time. Application for extension of the permit must be made prior to the expiration date.
3. Interpretation. Any questions of intent or interpretation of any condition will be resolved by the Executive Director or the Commission.

4. Assignment. The permit may be assigned to any qualified person, provided assignee files with the Commission an affidavit accepting all terms and conditions of the permit.
5. Terms and Conditions Run with the Land. These terms and conditions shall be perpetual, and it is the intention of the Commission and the permittee to bind all future owners and possessors of the subject property to the terms and conditions.

EXHIBIT D

To: Cliff Maurer
From: Bill Cecil
Date: May 6, 2015
Re: South Beach Restroom Coastal Commission Communication:

The following information is provided to respond to a question raised by the Councilwoman Downey regarding any Coastal Commission Communication.

Staff presented to Council the proposed South Beach Restroom design at its March 3, 2013 meeting. The building at that time was located perpendicular to Avenida del Sol.

Subsequent to that meeting Staff met with the Coastal Staff representative Diana Lilly to discuss the project. At that meeting Coastal Staff had two concerns.

If the building did not have some life safety component, staff would not favor a permanent building on the sandy beach.

Second the current design in their opinion would block the ocean view from Avenida del Sol.

Attached is an email from our Environmental Consultant Barbara Heyman dated February 20, 2014 regarding some communication she had concerning the South Beach Restroom. It reiterates the concerns regarding this project, should the Coastal Commission be asked. Those two issues were as noted above views and permanent structures.

Staff working with the architect designed another alternative that turned the building parallel to Avenida del Sol and moved the building east to narrow the building's profile and to hide a portion of it behind the existing rip rap.

Staff again met with Coastal Staff (Ms. Lilly) on March 17, 2014 to discuss the revised design and the use of a sea wall to protect the structure. The design parallel to the street was preferred over the previous design but there were still some reservations concerning public views.

Regarding their concern of a permanent structure on the beach, Walt Crampton (the marine engineer who did the wave run up study and foundation recommendation) discussed the use of a steel sea wall. As explained this type of sea wall, could be removed in a matter of days and would not in that case be considered permanent. Based on that discussion if Coastal were to review this project, the removal of the sea wall would be a condition of approval.

This design parallel to Avenida del Sol was presented to Council at its March 17, 2015 meeting for the consideration of the Initial Study of the South Beach Restroom. As a part of that review an EIR focused on noise and aesthetics was selected.

EXHIBIT E

CALIFORNIA STATE LANDS COMMISSION
1000 J Street, Suite 100-South
Sacramento, CA 95825-8202



JENNIFER LUCCHESI, Executive Officer
(916) 574-1800 Fax (916) 574-1810
California Relay Service TDD Phone 1-800-735-2929
from Voice Phone 1-800-735-2922

Contact Phone: (916) 574-2555
Contact Fax: (916) 574-1835

April 11, 2014

File Ref: PRC 3329.9

William Cecil
Capital Projects Manager
City of Coronado
1825 Strand Way
Coronado, CA 92118

SUBJECT: Status of a General Lease – Public Agency Use to the City of Coronado for the Use of State Sovereign Land for Portions of a Public Street in the City of Coronado, San Diego County

Dear Mr. Cecil:

By letter dated August 27, 2013, staff of the California State Lands Commission (Commission) notified the City of Coronado (City) that Lease No. PRC 3329.9, a General Lease – Public Agency Use for an easement for portions of Avenida Del Sol, would expire on July 19, 2014. The letter also notified the City that if it intended to continue to occupy and utilize the lands in question, it would need to submit an application to the Commission for a new lease.

As background, issuance of Lease No. PRC 3329.9 was authorized by the Commission on July 20, 1965 for a 49-year term. On December 14, 1966, the Commission authorized boundary line agreement 85 (BLA 85). BLA 85 established the August 5, 1964 mean high tide line as the fixed boundary between the State's sovereign interests and the interests of the City and certain private parties in the upland property, including the easement area subject to the Lease. BLA 85 also established a 100-foot wide easement, granted to the City along the length of the boundary line, for "...public recreational beach use, and for no other use..." and stipulated that said easement "...may not be terminated or substantially changed by any party hereto without concurrence of the State."

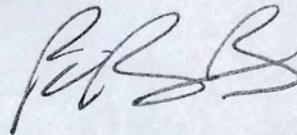
Based on a review of the information presented herein, staff has determined that the land subject to Lease No. PRC 3329.9 is no longer within the Commission's jurisdiction, and as such, an application to the Commission for a new lease is not required at this time. However, should the City desire to utilize the area within the 100-

foot easement created by BLA 85 for any purpose other than public recreational beach use, Commission review and approval may be required.

This determination is without prejudice to any future assertion of State ownership or public rights, should circumstances change, or should additional information come to the Commission's attention. In addition, this letter is not intended, nor should it be construed as, a waiver or limitation of any right, title, or interest of the State of California in any lands under its jurisdiction.

Should you have questions regarding any of the above information, please contact Ken Foster, Public Land Management Specialist, at either (916) 574-2555 or Kenneth.Foster@slc.ca.gov.

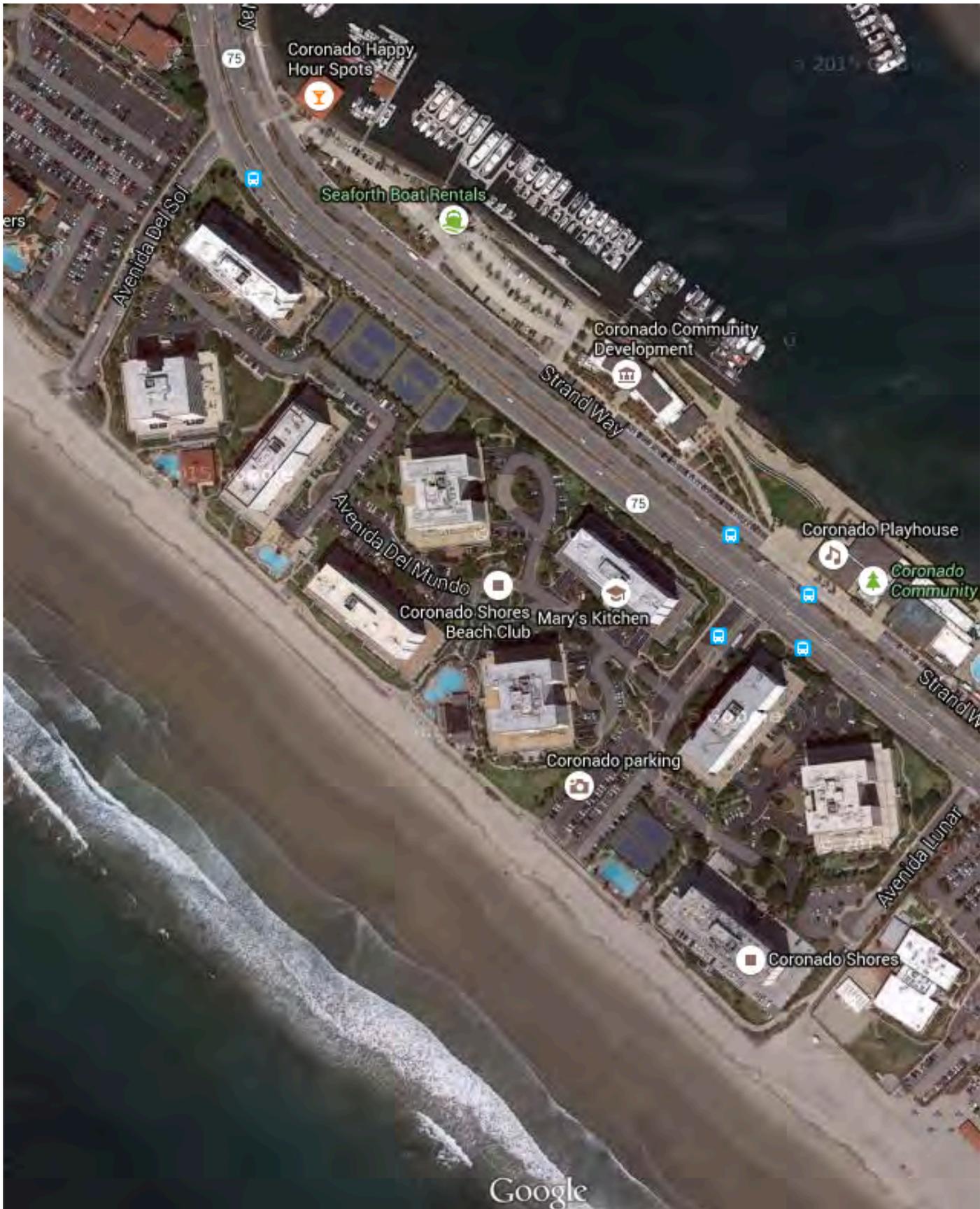
Sincerely,



Brian Bugsch, Chief
Land Management Division

cc: Ken Foster, PLMS
Land Management Division
CSLC

EXHIBIT F



Coronado Happy Hour Spots

Seaforth Boat Rentals

Coronado Community Development

Coronado Playhouse

Coronado Community

Coronado Shores Beach Club
Mary's Kitchen

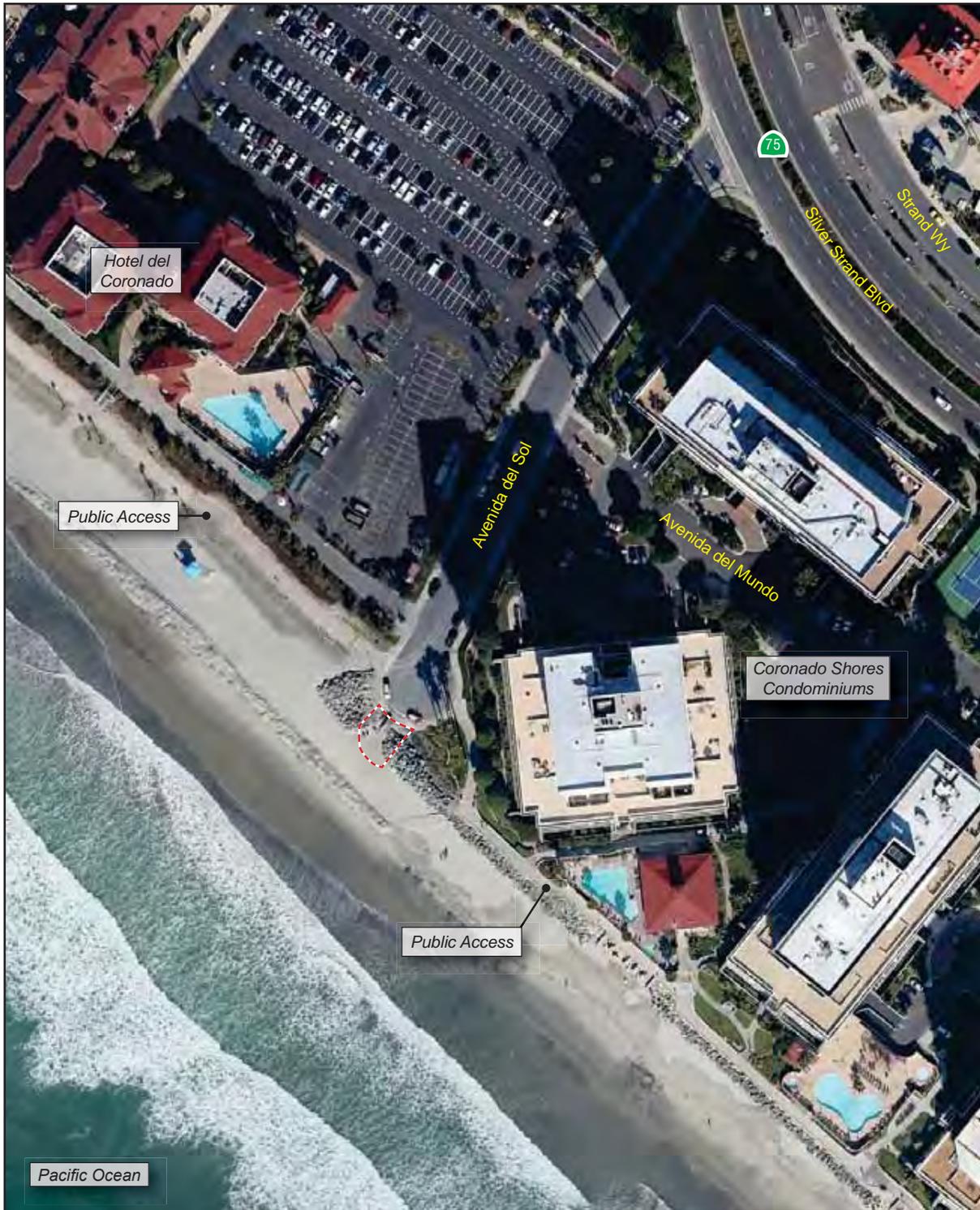
Coronado parking

Coronado Shores

Google

EXHIBIT G

Figure 4-1 - Aerial Photograph



----- Project Site

0 150
Scale (Feet)



Source: Google Earth Pro, 2014

June 2015

PlaceWorks

EXHIBIT H

From: Fait, Peter
Sent: Monday, February 24, 2014 2:31 PM
To: 'bheyman@planningcenter.com'
Subject: FW: Coastal Jurisdiction - Coronado Proposed South Beach Restroom
Attachments: Coronado South Beach Restroom Site & Coastal Jurisdictions.pdf

Peter Fait
City of Coronado

From: Fait, Peter
Sent: Monday, February 24, 2014 11:44 AM
To: 'Barbara Heyman'; Cecil, Bill; 'Amanda.Sackett@coastal.ca.gov'
Cc: Hurst, Rachel; McCaull, Ann
Subject: Coastal Jurisdiction - Coronado Proposed South Beach Restroom

A reminder to all:

The central beach restroom site was under direct Coastal Commission jurisdiction. The proposed south beach restroom site is not. This site is within the City's Coastal Permit jurisdiction and appealable to the State CCC (see attached map). The Coastal Permit will be reviewed by the Coronado Planning Commission. We would review the project for consistency with Coronado's approved LCP and implementing ordinances. One of the implementing ordinances approved by the CCC is section 86.74.020 of the Coronado Municipal Code which permits restrooms on public sandy beaches under certain circumstances as follows:

*86.74.020 Public sandy beaches.
No new development shall occur on existing public sandy beach areas. An exception would be allowed for new or expanded permanent lifeguard facilities, restroom facilities, bike paths or similar public recreation facilities, if it can be determined by the City that adverse impacts to public beaches are negligible or when public safety or health requires it; and provided, that no less environmentally damaging alternatives exist. This prohibition shall not be construed to restrict or regulate the maintenance, repair, rehabilitation or replacement of existing public facilities, or the activities of any governmental agency other than the City of Coronado on property under that agency's jurisdiction.*

Peter

From: Sackett, Amanda@Coastal [<mailto:Amanda.Sackett@coastal.ca.gov>]
Sent: Wednesday, February 12, 2014 3:15 PM
To: Barbara Heyman
Subject: RE: Project Description

Hi Barbara,

Thank you for sending the draft project description and drawings. The revised alignment of the building to be roughly parallel with the street end should reduce the visual impacts of the proposed structure compared to previous alternatives that placed the building perpendicular to the street end. However, there are still likely to be some visual impacts. Therefore, the environmental analysis should include a comprehensive visual analysis that assesses the impacts

to public views from various public vantages, including the top of the street, the street end, the public walkway, and the beach.

It is unclear from the submitted draft plans whether the project includes any shoreline protection or foundation structures designed to protect the structure from wave action and undermining. The environmental analysis should include a geotechnical report evaluating the risk to the structure from wave erosion. Typically, the Coastal Act does not permit the construction of shoreline altering devices to protect new development, because of the adverse impact these structures can have on shoreline sand supply. Structures such as restrooms should be considered expendable, and designed to be removed or relocated if threatened. I have attached a copy of the staff report for the restroom approved by the Commission at Coronado's North Beach area, so you can get a feel for the types of issues the Commission must consider, and potential conditions that might be placed on the proposed restroom.

A needs/alternatives analysis should also be included. While the proposed restrooms would provide a beach amenity at this portion of the beach, the Commission must weigh the benefit of new recreational support facility against the loss of sandy beach area that would result from the new construction. The analysis should explore other nearby possible sites that do not place the structure directly on sandy beach.

If you have any questions feel free to contact me.

Thank you,

From: Barbara Heyman [<mailto:bheyman@planningcenter.com>]
Sent: Monday, January 27, 2014 1:32 PM
To: Sackett, Amanda@Coastal
Subject: RE: Project Description

Hi Amanda,

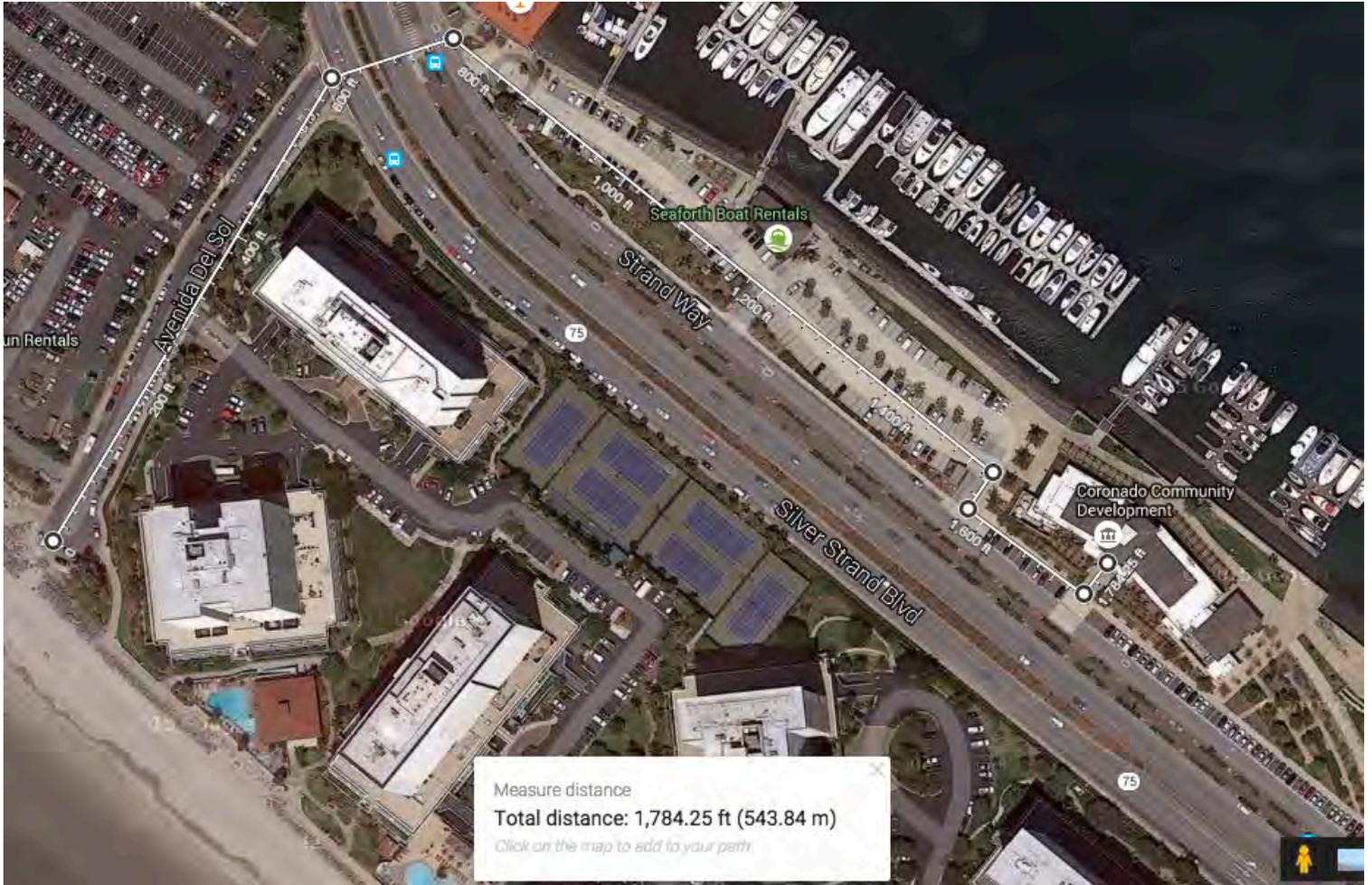
Thanks for getting back to me so quickly. We're still working on the project description, but below is a very rough draft. Attached are the preliminary schematic drawings. Feel free to call me if you want to further discuss.

Thanks,
Barbara
619.400.4927

The City of Coronado proposes to construct and operate a public restroom facility on South Beach near the end of Avenida del Sol to serve beachgoers in the South Beach area. The proposed building would be oriented in a north-south orientation behind an existing riprap at the end of Avenida del Sol. The building would be approximately 220 square feet, with three standard single-accommodation stalls; one ADA (American with Disabilities Act) accessible restroom; and a storage closet for an electric meter, equipment for closed circuit security camera equipment, electronics for access control, toilet supplies and cleaning equipment. The exterior of the restrooms would include two sinks for hand washing; two showers; and two hand dryers, one on each side of the sinks. All fixtures would be resistant to vandalism and corrosion.

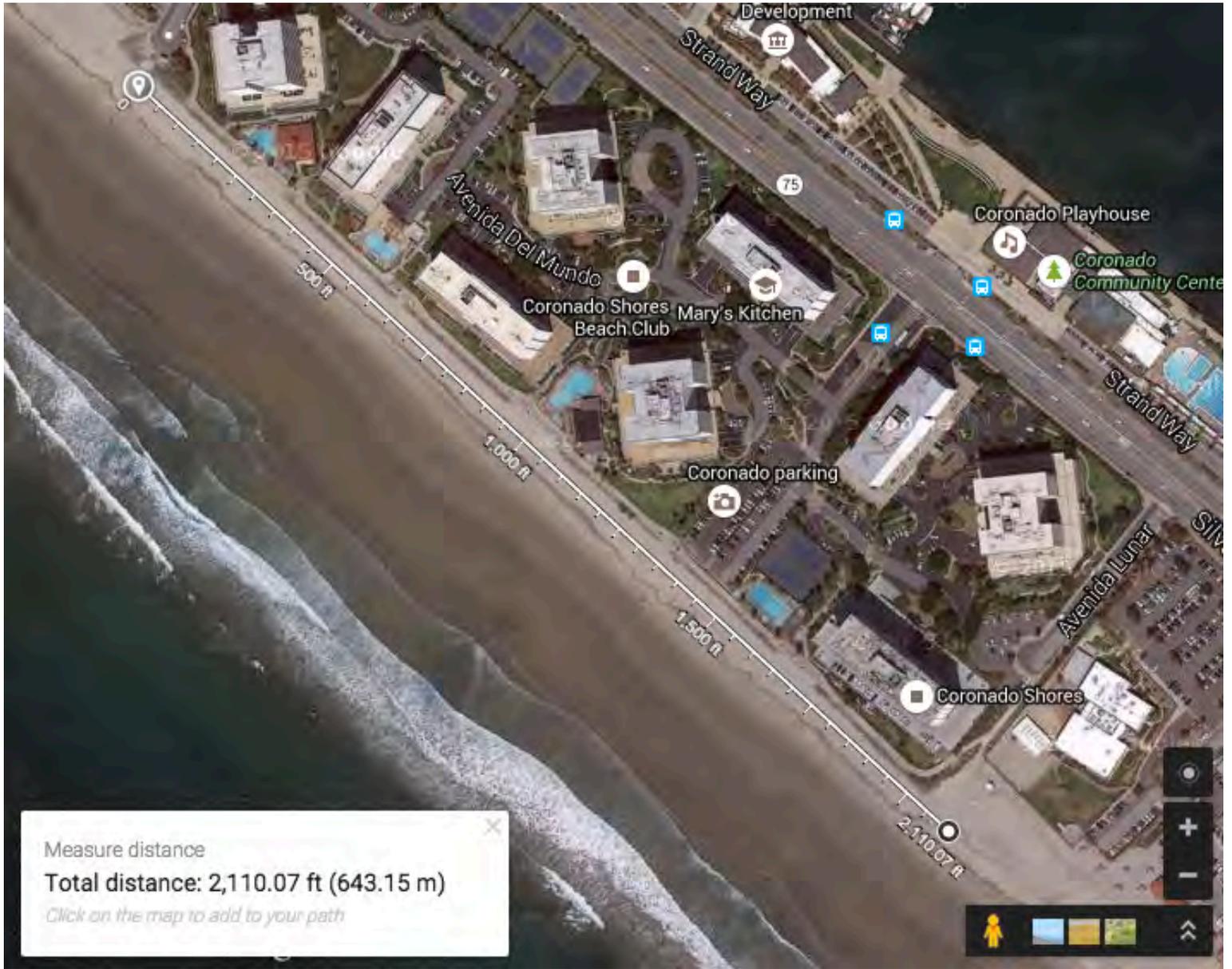
The facility would be similar to two other beach restroom facilities in Central and North beaches in that it would be composed of concrete block and finished with a natural rock veneer, with similar characteristics as the adjacent riprap. The roof of the building would be sand-colored and have a waterproof membrane so that it blends with the surrounding beach as viewed from above. Lighting would be recessed within the roof structure of each restroom stall. Exterior lighting would also be recessed within the roof structure and shielded in such a

EXHIBIT I



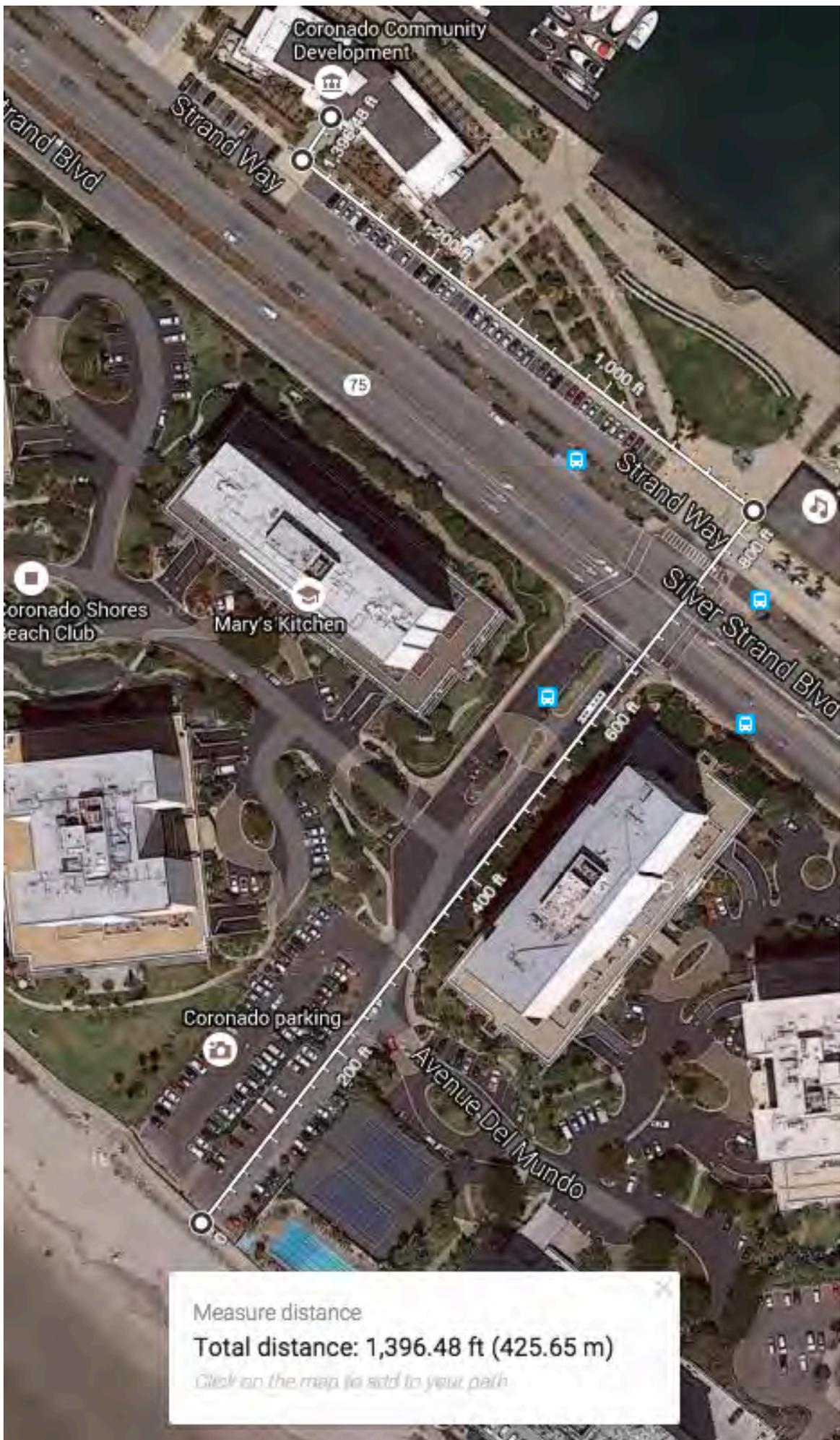
Measure distance
Total distance: 1,784.25 ft (543.84 m)
Click on the map to add to your path

EXHIBIT J



Measure distance
Total distance: 2,110.07 ft (643.15 m)
Click on the map to add to your path

EXHIBIT K



Measure distance
Total distance: 1,396.48 ft (425.65 m)
Click on the map to add to your path

Section IV. REASONS SUPPORTING THIS APPEAL

Background

The City of Coronado has approved the construction of a restroom on the sandy beach at the street-end of Avenida del Sol. This restroom will be armored with a seawall on three of its four sides. (Final Environmental Impact Report (“FEIR”), p. 2-54 [“the restroom structure would now be protected by vertical cantilevered sheet-pile seawalls/bulkheads with wave deflectors on three of the four sides of the proposed facility”].) These seawalls are “[f]or wave and shore protection.” (Draft Environmental Impact Report (“DEIR”), p. 1-4.) The City has provided a simulation of the restroom in the winter, which shows the restroom impacted by waves. (Coronado City Council Agenda for November 15, 2016, p. 148.) This simulation, based on existing conditions, is shown below:



View for 9th Floor Shores Tower – winter view

However, this simulation does not account for additional beach erosion and sea level rise. The State’s California Climate Change Center published a study that analyzed

the impacts of sea level rise in San Diego, and the study includes a map of the project site. (Climate Change-Related Impacts in the San Diego Region by 2050, p. 16, available at <http://www.energy.ca.gov/2009publications/CEC-500-2009-027/CEC-500-2009-027-F.PDF>, p. 16.) This map shows that by 2050, there will be considerable additional beach loss and inundation of the project site from wave events will be common. (*Ibid.*)

Following the preparation of a Wave Runup Study commissioned by the City as part of its Initial Study, the Coronado Homeowners Association #2 (“Association”) commissioned its own expert, Dr. David Revell, a coastal geomorphologist, to analyze the Project and the City’s Wave Runup Study. Dr. Revell concluded that 1) the City’s Wave Runup Study likely underpredicts the exposure of the site to coastal hazards; 2) the potential beach width changes are greater than those discussed in the City’s study, and thus the Project site may be more vulnerable to scour and erosion; and 3) the location of the project creates a human health hazard by placing new wastewater infrastructure in an existing hazardous area.

Dr. Revell provided the following Summary of Findings:

The proposed City of Coronado restroom location is vulnerable to existing coastal and tsunami hazards and does not adequately consider the life expectancy of the proposed project with respect to escalating coastal hazards caused by sea level rise.

- Historic wave events have caused substantial damage and inundation at the proposed site.
- Without any coastal armoring, the City should expect the site to be impacted on a regular basis without consideration of sea level rise or El Niño conditions.
- During the 2015/2016 El Niño, beach erosion scoured the beach to an elevation of ~5 feet (NAVD) at the proposed site, which was then subject to routine tidal inundation.
- All of the existing and future coastal hazard modeling developed by California Geological Survey, USGS and SPAWAR, show the site to be susceptible to tsunamis, coastal erosion and coastal flooding under existing conditions. These hazards increase substantially with sea level rise.
- The construction of a seawall, in front of the facility as part of the construction, will lead to long-term loss of the beach, recreational opportunities and will affect lateral beach access.

Recommendation: Revell Coastal recommends than an alternate site be identified for this public serving facility.

(Coronado City Council Agenda for November 15, 2016, p. 170.)

While the Association supports a public restroom near the beach, the Association opposes a restroom on the beach in the current location.

1. The Project Violates Local Coastal Program Policy E.4 Requiring Setbacks from an Eroding Beach Coastline.

The City of Coronado's Adopted Local Coastal Program (LCP) Policy E.4:

Require[s] that any permanent building, or other structure proposed for construction be set back from an eroding beach coastline a distance sufficient to assure that the development will not be threatened by natural erosion processes during the lifetime of the structure without requiring shoreline protection structures.

(LCP, p. 13.)

The City acknowledges that the beach where the project is proposed to be located is eroding. (FEIR, p. 2-57 ["Erosion will continue regardless of project implementation"]; "Consequently, even with dredged sand brought to the beach area near Avenida del Sol, the Wave Runup Study indicates there will continue to be a natural tendency for sediment depletion and for sand to drift to North Island via longshore transport"]; LCP, p. 13 [Coronado's LCP recognizes that there exists a "beach erosion problem South of the Hotel del Coronado jetty," which is where the project is proposed.]

However, the Project does not comply with the requirement that the structure be set back from the eroding beach such that it does not require shoreline protection structures, as the project is sited directly on the beach and uses three seawalls for "wave and shore protection." (DEIR, p. 1-4.) The City acknowledges that the Project was designed with a seawall "[t]o ensure that the proposed facility can withstand strong waves and scouring." (FEIR, p. 2-68 – 2-69.)

2. The Project Violates Local Coastal Program Policy E.2 and Coastal Act Section 30235 Regarding Limitations on the Use of Seawalls.

LCP Policy E.2 authorizes the use of seawalls in only limited situations:

Permit ... seawalls ... and other such construction that alters natural shoreline processes when required to serve coastal-dependent uses or to protect existing structures or public beaches in danger from erosion and when designed to eliminate or mitigate adverse impacts on local shoreline sand supply.

(City of Coronado Local Coastal Program (“LCP”), p. 13.) This language is consistent with Coastal Act section 30235.

This restroom is not “required to serve coastal-dependent uses” because the restroom does not have to be located on the beach to serve its function. Additionally, the seawalls are not to protect an existing structure or the beach itself. Even assuming, arguendo, that a restroom was a coastal-dependent use, there is no evidence that the project was designed to eliminate or mitigate adverse impacts on local shoreline sand supply.

The EIR recognizes that the Coastal Commission, in implementing the Coastal Act, “typically discourages the construction of shoreline-altering devices to protect new development along the shoreline because of the potential adverse impact these structures can have on shoreline sand supply.” (DEIR, p. 10-2.) The EIR further states:

Construction of shoreline-altering features is typically discouraged by the C[alifornia] C[oastal] C[ommission] because of their potential to adversely impact shoreline sand supply and for reasons that would undermine the features as unusable, including but not limited to sea level rise and significant scour that would undermine the sea wall.

(DEIR, p. 9-2, fn. 1.) Despite recognizing that the Coastal Commission discourages the use of shoreline-altering devices to protect new developments, the City nonetheless approved the project with these elements.

3. The Project Is Inconsistent with Local Coastal Program Goal B.3 Regarding New Development on Existing Sandy Beach Areas.

Under LCP Policy B.3, new development, including restroom facilities, shall only be permitted on existing sandy beach areas “if it can be determined that adverse impacts to public beaches are negligible or when public safety or health requires it, and provided that no less environmentally damaging alternatives exist.” (LCP, p. 21, *emphasis added.*) As Dr. Revell concluded, the construction of a seawall for the Project will lead to long-term loss of the beach, recreational opportunities and will affect lateral beach access. (Coronado City Council Agenda for November 15, 2016, p. 170.) These adverse impacts are not “negligible.”

Additionally, the requirement that “no less environmentally damaging alternatives exist” is not satisfied here. The City failed to analyze additional alternative locations because it concluded the proposed location is “the most feasible on-sand option.” (DEIR, p. 7-11, *emphasis added.*) As previously discussed, locating a restroom on the beach is not necessary, as the restroom is not beach dependent. Therefore, alternative project locations should not have been limited to “on sand” locations. This could include, for example, the location where the portable, prefabricated restrooms were previously located. However, the City did not analyze this potential location.

4. The Project Violates Local Coastal Program Policy H.2 and Coastal Act Section 30251 Regarding Visual Impacts.

Policy H.2 of Coronado’s LCP “[r]equire[s] that permitted development be sited and designed to safeguard existing public views to and along the ocean.” (LCP, p. 16.) Coastal Act Section 30251 contains language that is substantially the same. The City’s placement of the structure in the middle of the street-end of Avenida del Sol will block existing public views of the ocean.

Conclusion

Since the Project does not conform to LCP Policies E.2, E.4, and H.2, conflicts with the Coastal Act, and is inconsistent with LCP Goal B.3, the Association respectfully requests that the Commission grant the Association's appeal and deny the Project as proposed.



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August 5, 2016

*By e-mail (bcecil@coronado.ca.us);
Original to follow*

William Cecil
Capital Projects Manager
City of Coronado
1825 Strand Way
Coronado, California 92118

**Re: Technical Report Evaluating the Coastal Hazards of the South Beach
Restroom Project**

Dear Mr. Cecil:

On behalf of Coronado Shores Homeowners Association No. 2, we hereby submit the attached *City of Coronado Proposed Restroom at Avenida del Sol: Technical Review*, prepared by coastal geomorphology expert Dr. David Revell. Dr. Revell analyzes the South Beach Restroom Project at the street-end of Avenida del Sol. Dr. Revell's report, attached as **Exhibit A**, evaluates the proposed project's impacts and also analyzes the 2012 Terra Costa Wave Runup Study, located at Appendix G to the Initial Study. Dr. Revell's curriculum vitae is attached as **Exhibit B**.

Dr. Revell's report disagrees with the Wave Runup Study in three important areas. Dr. Revell concludes that 1) the Wave Runup Study likely underpredicts the exposure of the site to coastal hazards; 2) the potential beach width changes are greater than those discussed in the Wave Runup Study, and thus the Project site may be more vulnerable to scour and erosion; and 3) the Wave Runup Study's recommendation to construct a sheet pile seawall potentially creates a human health hazard by placing new wastewater infrastructure in an existing hazardous area.

Dr. Revell concludes that the proposed location is in an area vulnerable to existing coastal hazard from coastal flooding, beach narrowing and coastal erosion. In the future, as a result of climate change and sea level rise, these impacts are anticipated to worsen. Thus, Dr. Revell's primary recommendation is that the City consider alternative locations for the proposed project.

City of Coronado
August 5, 2016
Page 2

Thank you for your consideration of this important information.

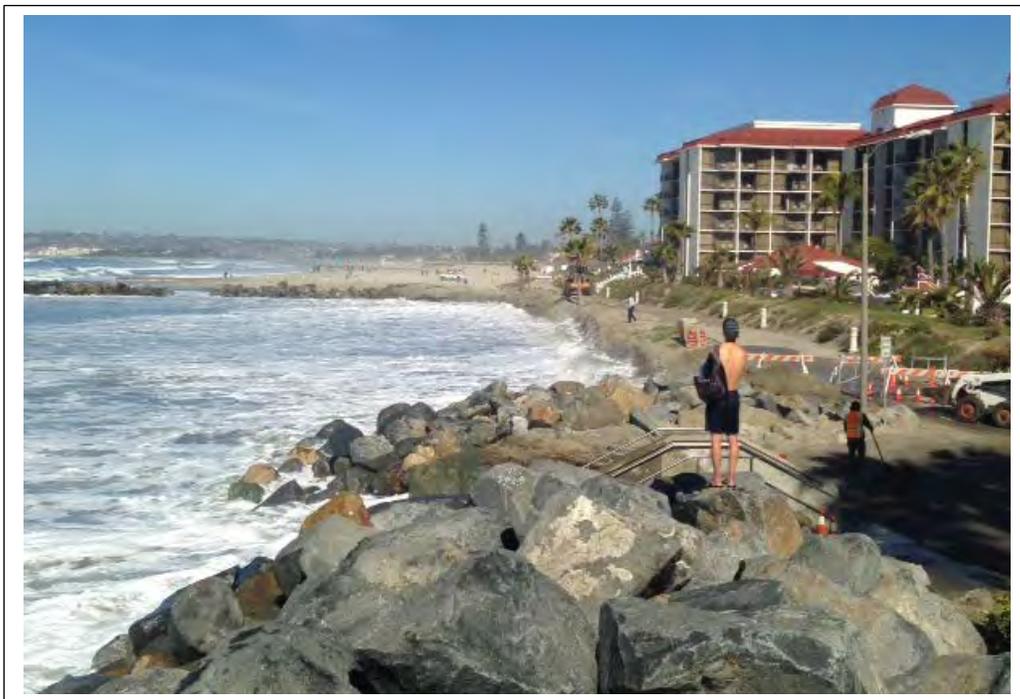
Sincerely,



Josh Chatten-Brown

EXHIBIT A

City of Coronado Proposed Restroom at Avenida del Sol: Technical Review



7/22/2016

Submitted to Coronado Shores Homeowners Association #2

By

Revell Coastal, LLC

125 Pearl Street, Santa Cruz, CA 95060

revellcoastal@gmail.com | 831.854.7873



Summary of Findings

The proposed City of Coronado restroom location is vulnerable to existing coastal and tsunami hazards and does not adequately consider the life expectancy of the proposed project with respect to escalating coastal hazards caused by sea level rise.

- Historic wave events have caused substantial damage and inundation at the proposed site.
- Without any coastal armoring, the City should expect the site to be impacted on a regular basis without consideration of sea level rise or El Niño conditions.
- During the 2015/2016 El Niño, beach erosion scoured the beach to an elevation of ~5 feet (NAVD) at the proposed site, which was then subject to routine tidal inundation.
- All of the existing and future coastal hazard modeling developed by California Geological Survey, USGS and SPAWAR, show the site to be susceptible to tsunamis, coastal erosion and coastal flooding under existing conditions. These hazards increase substantially with sea level rise.
- The construction of a seawall, in front of the facility as part of the construction, will lead to long-term loss of the beach, recreational opportunities and will affect lateral beach access.

Recommendation: Revell Coastal recommends than an alternate site be identified for this public serving facility.

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Purpose

The purpose of this technical report is to evaluate the City of Coronado’s proposed public restroom at the end of Avenida del Sol. This report includes a technical review of the state of the science provided in support of the City project, and provides additional information and analysis based on historic observations, current research, modeling results and observed impacts associated with the El Niño of 2015/16.

Setting

The restroom is proposed for South Beach in Coronado at the end of Avenida del Sol (Figure 1).

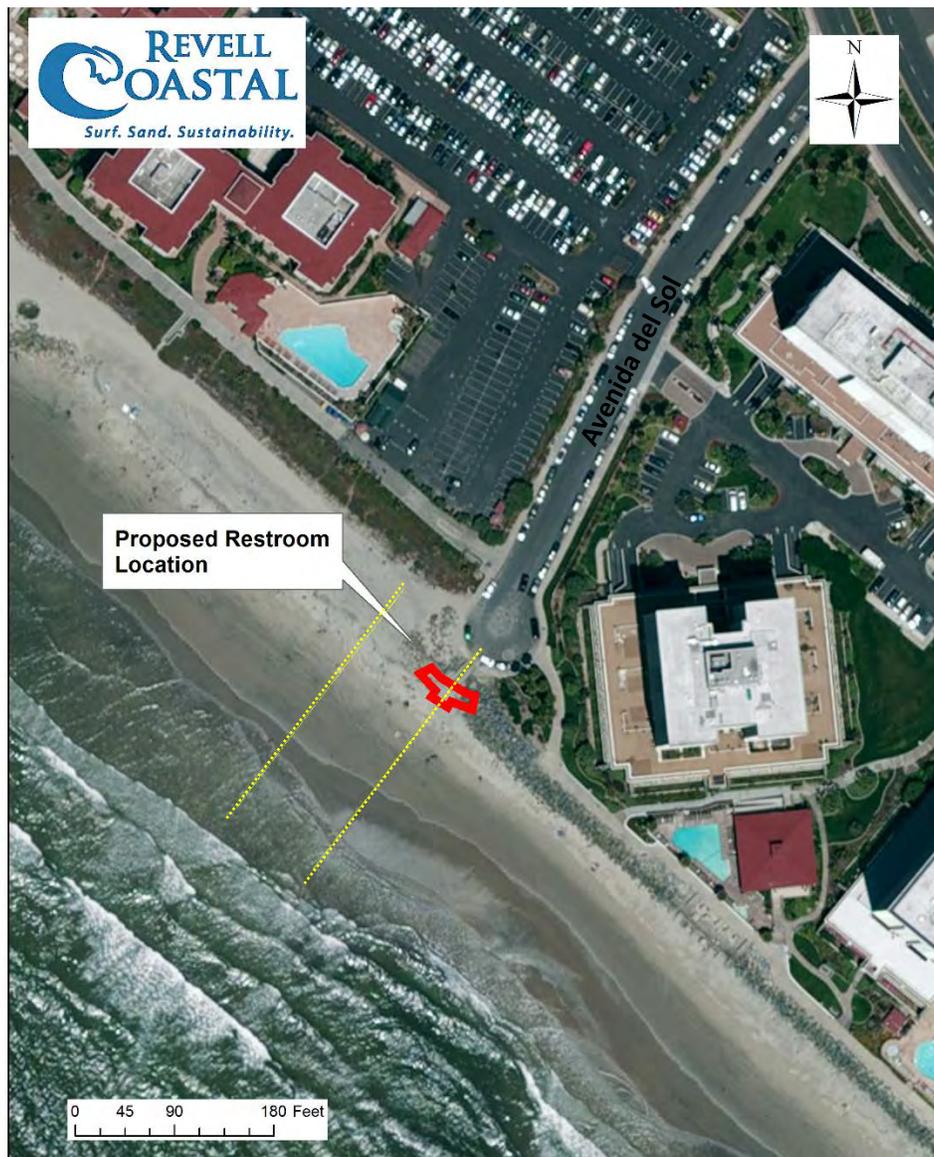


Figure 1. The site of the proposed restroom at the end of Avenida del Sol in the City of Coronado. (Thin yellow lines show locations of beach profile analysis)

The site is located at the north end of the Silver Strand littoral cell, which extends from just north in Coronado down into Mexico. Sediment on the beaches originates largely from the Tijuana River discharge, bluff erosion in Mexico, and episodic nourishment projects. Sediments are transported from south to north in response to south swell activity and refracted northwest wave energy around Point Loma. The site is located immediately upcoast (south) of the Hotel del Coronado jetty, which was constructed to stabilize the beach, enhance sand retention, and reduce wave energy in front of the Hotel Del Coronado.

Proposed City Project

The proposed restroom project would require the reconfiguration of an existing revetment and removal of existing stairs to then construct a restroom, patio, showers, a new set of stairs, and an ADA accessible access ramp. Proposed final floor elevations are based on existing FEMA guidelines of 9.0 feet NAVD (6.8' NGVD) and additional wave run up calculations completed by the TerraCosta Group (2012).

Review of 2012 Terra Costa Report

In 2012, the Terra Costa Group published a report called "*Wave Runup Study South Beach Restroom Project Avenida Del Sol Coronado, California*" for the City of Coronado. Upon thorough review of the Terra Costa report, Revell Coastal agrees with the summary of historic investigations in the Silver Strand littoral cell and the summary of the scientific findings presented in the Terra Costa Report. To avoid repetition, we highlight some of the key findings as a summary of the Terra Costa report below. Additionally, Revell Coastal has identified several points of disagreement.

Summary of Terra Costa findings

This section provides a summary of the key findings from the Terra Costa report most relevant to the project, and which Revell Coastal agrees.

- Sound summary of coastal processes including tides, wave runup, and sea level rise that contribute to increasing total water levels.
- Historic sediment deficit at the site is caused by changes to the sediment delivery, largely as a result of dam construction on the Tijuana River.
- Historic erosion events have narrowed the beaches in front of the site by 200 feet in a single storm season.
- The use of the research from the SPAWAR Systems Center Pacific (Chadwick et al 2011) describing the contribution of tides, non tidal residuals, sea level rise and wave run up is suitable for evaluating vulnerabilities at this site.
- Revell Coastal concurs that the effective FEMA flood maps are extremely low.
- The proposed base-floor elevation for the project of 13.1 feet NAVD (10.2' NGVD) represents the present day 50-year total water level (i.e. tides, surge and wave runup) elevation, becoming a 2-year recurrence interval wave event with 1.64 feet of sea level rise.

Points of Disagreement with Terra Costa report

Upon thorough review of the Terra Costa report, Revell Coastal has three points of disagreement, which both understate the potential risk to the proposed restroom.

First, in its present form, the wave run up analysis likely underpredicts the exposure of the site to coastal hazards. The wave run up elevations used to calculate the total water level recurrence intervals are based on the wave run-up parameterization of Stockdon et al. (2006). This runup methodology is appropriate for application only to natural sandy beaches, and not those that have armoring structures such as the existing revetment and stairs or the proposed seawall. The wave run up dynamics are different on a composite slope (one with a fronting sandy beach backed by a structure) in which wave run up elevations can be much higher than that calculated using Stockdon. Any further design work on the seawall should include wave run up equations more suited to run up on the specific proposed structure. This additional run up analysis should also include the more seaward location of the proposed restroom as it would further narrow the fronting beach.

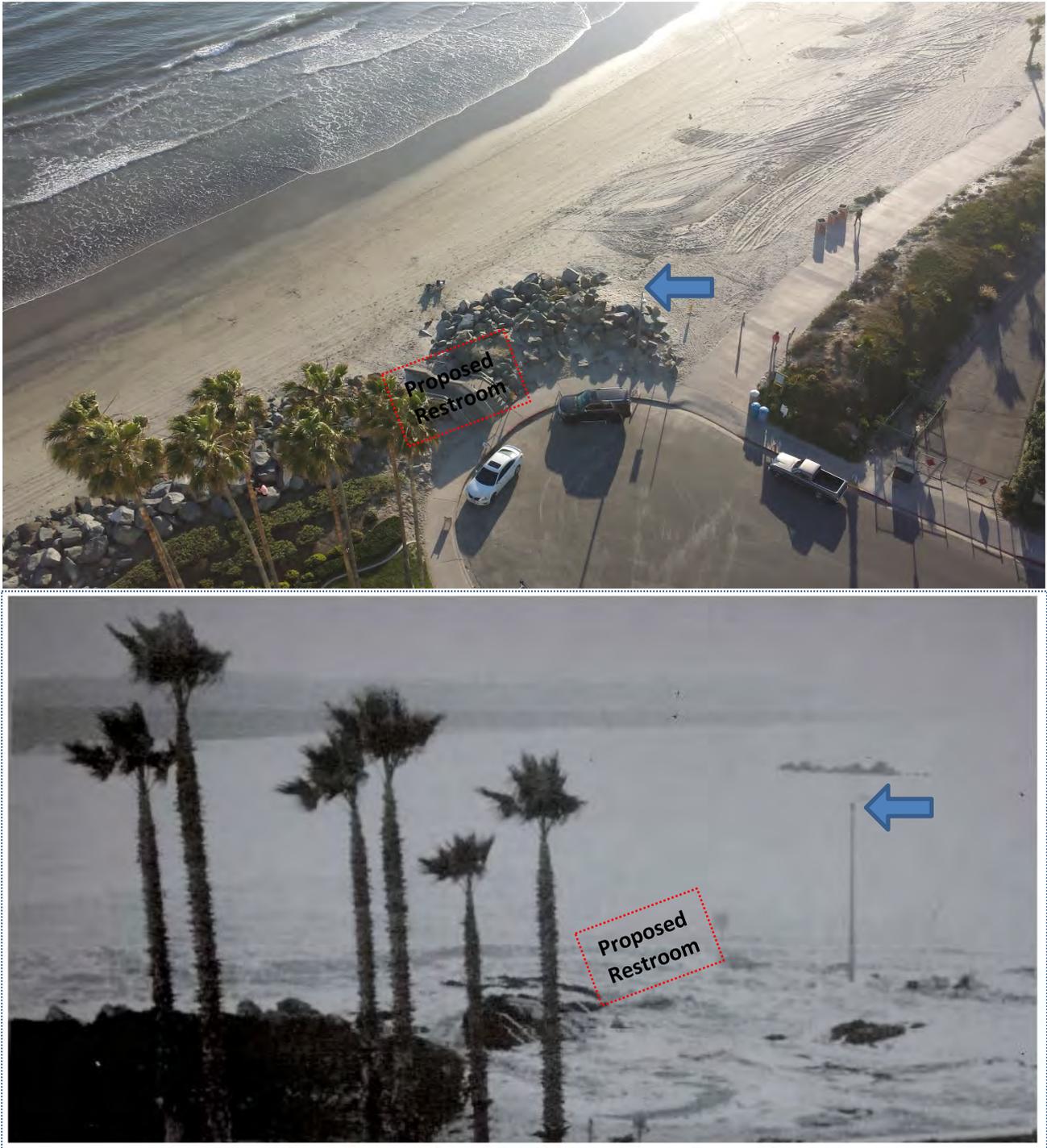
Second, the beach width modeling results reported in the Terra Costa Report are extracted for an unknown location “north of the Hotel del Coronado”, in a site where there is a beach that is 790 feet wide. While the precise location of this model analysis is unstated, this site is most likely north of the Hotel del Coronado jetty, where there are additional wave height reductions and more sediment retention capacities than the proposed site. The Yates model does require beach widths to calibrate and run, and these data in the form of LIDAR data are ready available for the study site (see discussion of beach width changes below). Regardless, it is likely that the potential beach width changes are greater than those discussed in the report, meaning that the potential study site may be more vulnerable due to scour and erosion due to the greater beach width variability.

Finally, despite the detailed summary of the science and risk of inundation and clear acknowledgement of the risk of the proposed restroom to coastal hazards, the Terra Costa report makes a recommendation to construct a sheet pile seawall seaward of the existing stairs and revetment with a wave deflector to protect the restroom. Revell Coastal disagrees with this recommendation as it places new wastewater infrastructure in an existing hazardous area, potentially creating a human health hazard as well and violates California Coastal Act hazard avoidance policies for new development.

Analyses, Findings and Discussion

The analyses by Revell Coastal included a technical review of the TerraCosta 2012 Report, compilation and synthesis of new coastal hazard modeling results completed since the 2012 report, and additional analysis on beach width changes, including changes associated with the El Niños of 1997-98 and 2015-16.

Anecdotal and observational evidence have clearly shown that large historic storm events already pose substantial risk to the proposed site (Figure 2).



**Figure 2. Proposed restroom site in 2016 (top Photo D. Revell) and during the 1982-83 El Niño (Photo C. Miller)
Note approximate location of the proposed restroom and the same light pole.**

El Niño and Beach Changes

Beaches are dynamic environments that change constantly. Beaches change on a seasonal cycle, an interannual cycle, and based on the occurrence of large events such as El Niños. To understand the range of historic variability, historic LIDAR topographic data set was obtained and analyzed for two locations on the beach, one at the site of the proposed restroom and one just to the north, in front of the Hotel del Coronado (Figure 1). In addition, a topographic survey was completed in March 2016 at the very end of the recent El Niño and it shows the most eroded condition previously documented.

The results from the beach profile analysis at the proposed restroom site are shown in Figure 3 and Table 1. For this discussion, beach width was defined the same as the Terra Costa Group report, and extends from the back of the beach to the NGVD plane (2.2' NAVD). These beach profile results show several pieces of information:

- During the analyzed period, the beach has narrowed by 213 feet, due to both seasonal and El Niño impacts
- The beach narrowed by 145 feet during the 1997/98 El Niño.
- Beach elevations near the stairs have shown scour of a maximum of 9.3 feet following the 2015/16 El Niño. This scour can be seen in Figure 4.

Table 1. Changes in Beach Width and Beach slopes at the Proposed Restroom site

	Oct-97	Apr-98	Apr-07	Sep-10	Mar-16
Beach Slope Degrees	2.12	0.97	1.2	1.89	2.86
Beach Slope V:H	1:25	1:50	1:50	1:33	1:20
Beach Width (ft.)	297	152	191	158	84

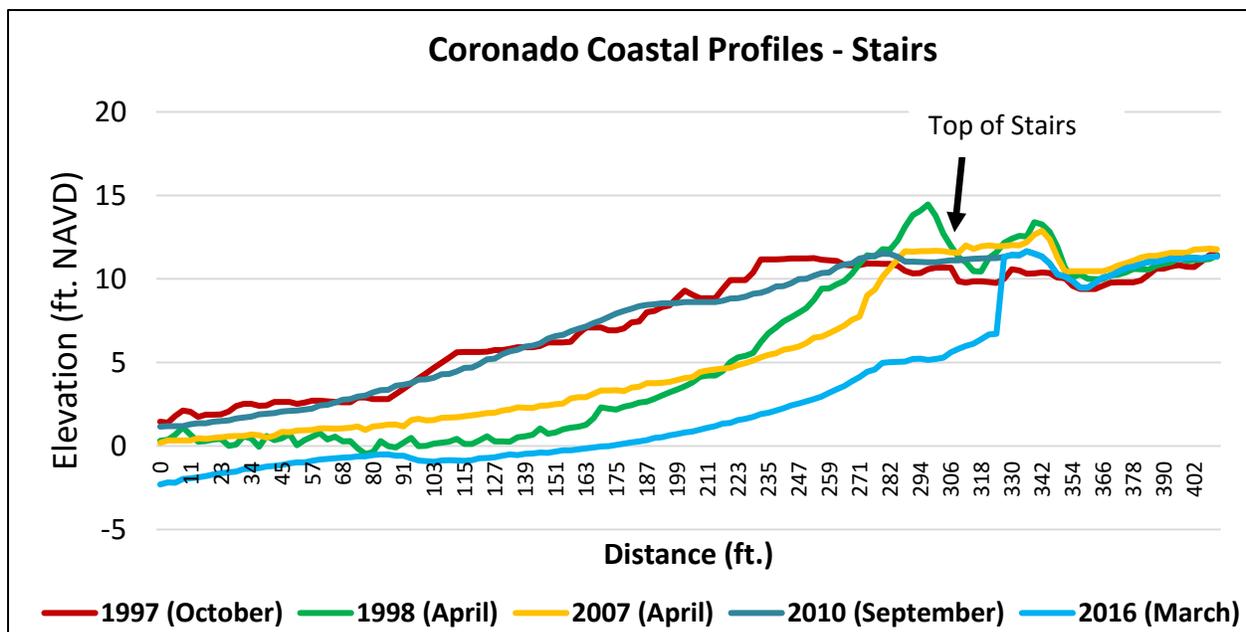


Figure 3. Beach profile changes at the proposed restroom location

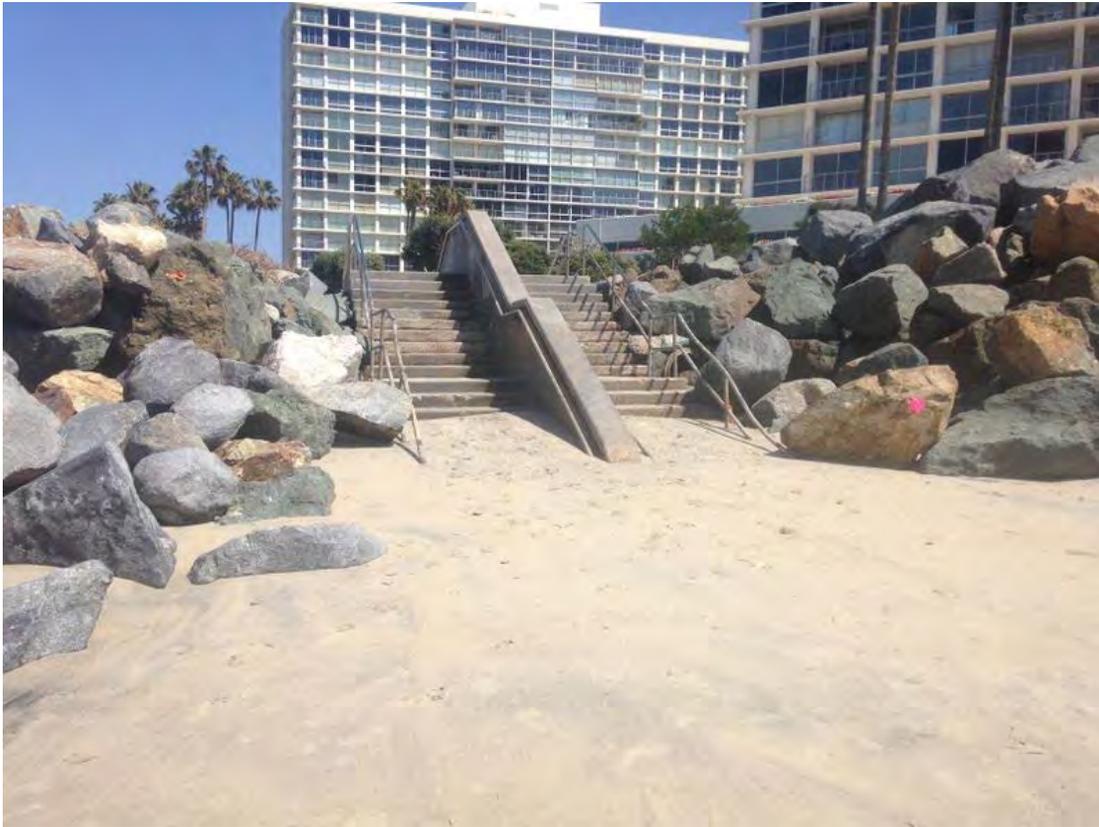


Figure 4. Photo taken during field survey showing scour at steps. (Photo T. Gallien) 3/26/2016.

The results from the beach profile analysis just north of the proposed restroom site (Figure 1 thin yellow line) are shown in Figure 5 and Table 2. Findings from this analysis show:

- During this time period, the beach has narrowed by 209 feet, due to both seasonal and El Niño impacts
- The beach narrowed by 137 feet during the 1997/98 El Niño
- Between 2010 and the end of the 2015/16 El Niño, the beach narrowed by 226 feet.
- Beach elevations near the stairs have shown scour of a maximum of 8.5 feet from previous sand elevations following the 2015/16 El Niño.

Table 2. Changes in beach width and beach slopes north of the proposed restroom site

Beach	1997	1998	2007	2010	2016
Beach Slope Degrees	1.37	4	3.89	1.95	3.43
Beach Slope V:H	1:41	1:14	1:15	1:29	1:17
Beach Width (ft.)	283	146	147	300	74

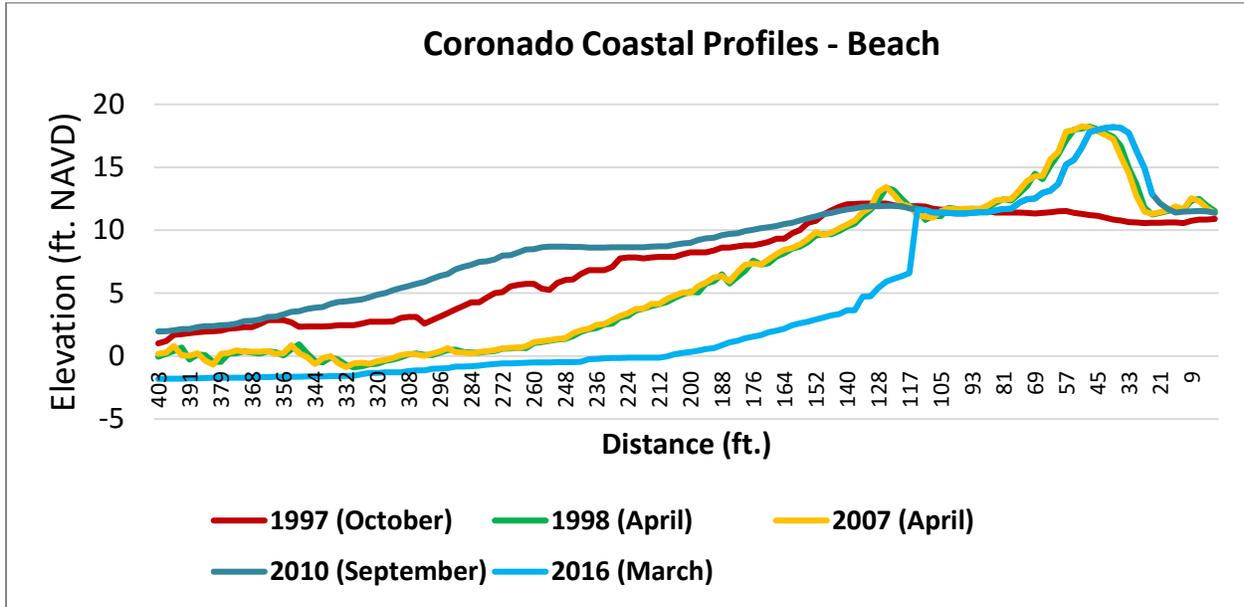


Figure 5. Beach profile changes just north of the proposed restroom location at an unarmored location.

Water level and Wave Run up Analysis

Wave run up can vary widely based on the beach slopes. Generally, the steeper the beach slope the higher the wave run up elevation. The Terra Costa report noted in an April 2012 survey that beach slopes were about 1:9 (Vertical: Horizontal). Analysis of beach slopes in this beach profile analysis show that the beach slopes varied widely from a 1:14 to 1:50 (V:H). These less steep slopes indicate that wave run up may be a bit lower on natural sandy slopes. However as previously mentioned the armored backshore means that a different type of wave run up analysis would be required, as Stockdon is not applicable for wave run up analysis on coastal structures.

The King tide on November 25, 2015, reached 7.61 NAVD (5.41’ NGVD). This elevation exceeded the highest water levels previously recorded at the La Jolla tide gage (Figure 6). Other peak observed tide levels include 7.36’ NAVD (January 2005) and 7.35’ NAVD (in November 1997).

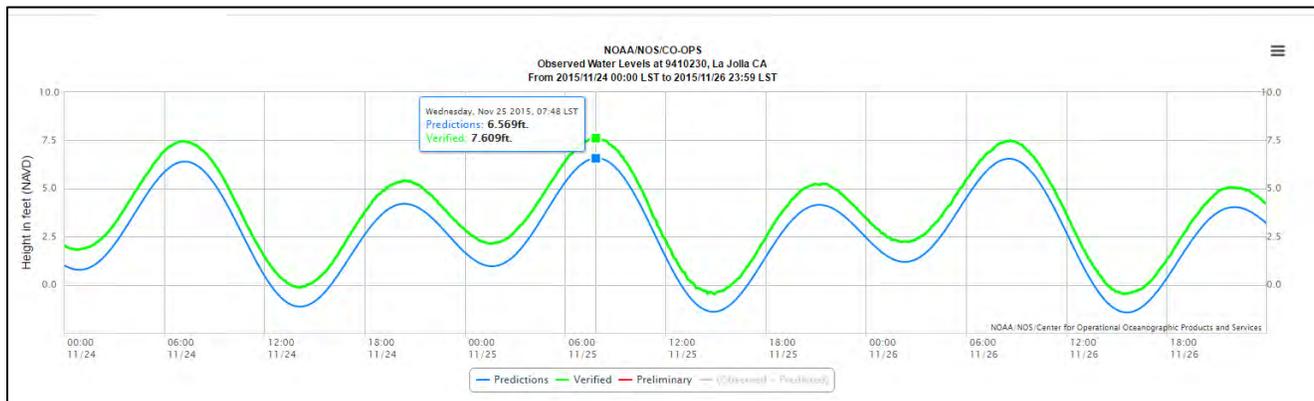


Figure 6. Highest recorded water level at the La Jolla gage (Source: NOAA Tides and Currents website)

Tsunamis

The California Geological Survey has recently completed modeling of potential tsunami inundation (Figure 7) (2009). The inundation map was compiled with best currently available scientific information and included analysis of local earthquake derived sources and submarine landslides, as well as distant sources like Chile or Alaskan earthquakes. The inundation line (shown in pink) represents the maximum considered tsunami runup from a number of extreme, yet realistic, tsunami sources. Tsunamis are rare events and due to a lack of known occurrences in the historical record, there are no probabilities assigned to this tsunami. From the mapped results it is easy to see that the proposed site is in the tsunami hazard zone.

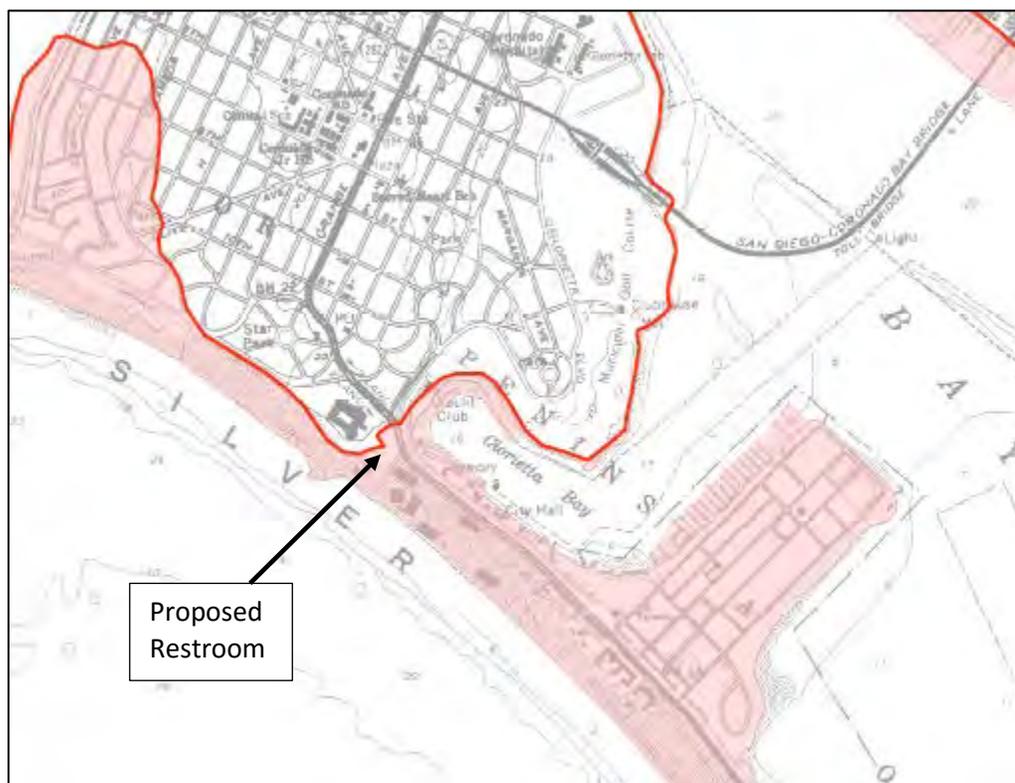


Figure 7. Tsunami Inundation map excerpt from California Geological Survey (2009).

Sea Level Rise

Since 2012, there have been two substantial modeling efforts of the impacts of coastal erosion and coastal flooding with sea level rise on the proposed restroom site. One of these efforts was led by the United States Geological Survey (USGS), and the second one led by SPAWAR Systems Center Pacific which included work by TerraCosta Group. Both of these models projected coastal flooding from a 100-year wave event with 0, 0.5, 1.0 and 2.0 meters of sea level rise. It should be noted that there are a wide range of uncertainties in modeling of sea level rise and coastal hazard impacts. Some of these arise from uncertainties in rates or elevations of sea level rise, different modeling methods and assumptions, as well as variations in the topography over which the results

are mapped. One way to address or consider the uncertainty is to evaluate a range of sea level rise scenarios and compare multiple models. The sections below briefly describe the models and shows the results.

USGS COSMOS 3.0

In 2014, USGS was funded by the California State Coastal Conservancy, the City of Imperial Beach, Tijuana River National Estuary Research Reserve and California Department of Fish and Wildlife to specifically model and map the effects of coastal flooding and provide projections of long-term shoreline change. The COSMOS 3.0 results shown in this study are initial results that project the impacts of a 100-year winter wave event (or an event that has a 1% chance of occurring in a given year) at current sea level, 0.5 m, 1.0 m, 1.5 m and 2.0 m of sea level rise. The FINAL COSMOS 3.0 results should be available in Fall of 2016.

A detailed “Frequently Asked Questions” (or FAQ) has been developed that lists the data sources utilized in developing COSMOS 3.0. It also provides more detail on the details of the modeling methodology. It can also be downloaded from the San Diego Regional Climate Collaborative website: http://sdclimatecollaborative.org/wp-content/uploads/2016/05/CoSMoS-FAQ_Final_5.16.16.pdf

Results of the Initial USGS COSMOS 3.0 coastal flooding model show that the existing site is already susceptible to wave overtopping and coastal flooding (Figure 8).

SPAWAR

This project funded by Department of Defense developed a methodology to evaluate impacts of sea level rise and coastal hazards to coastal military installations over the next century (Chadwick et al 2011, SPAWAR 2014). Fortunately, the pilot project focused on Naval Base Coronado as one of the sites. Model results mapped future projections of coastal erosion, coastal flooding, tidal inundation and depth of flooding along with various recurrence intervals. These results of the tidal inundation, coastal erosion and depth of flooding were integrated into this Report and results shown in Figure 9 and 10 and Table 3. It should be noted that while SPAWAR modeling included the existing structures, the assumption was made that once the structure was overtopped that the structure would fail. Since the stairs and structure at the proposed restroom site, already get overtopped, the erosion results assume that the revetment is insufficient to stop coastal erosion.

Table 3. Depth of flooding at the Proposed Restroom Site for various sea level rise elevations (data from SPAWAR)

SPAWAR	Baseline 2010	0.5m SLR	1.0m SLR	2.0m SLR
Flood Depth (ft.)	1.1	2.5	3.7	4.9

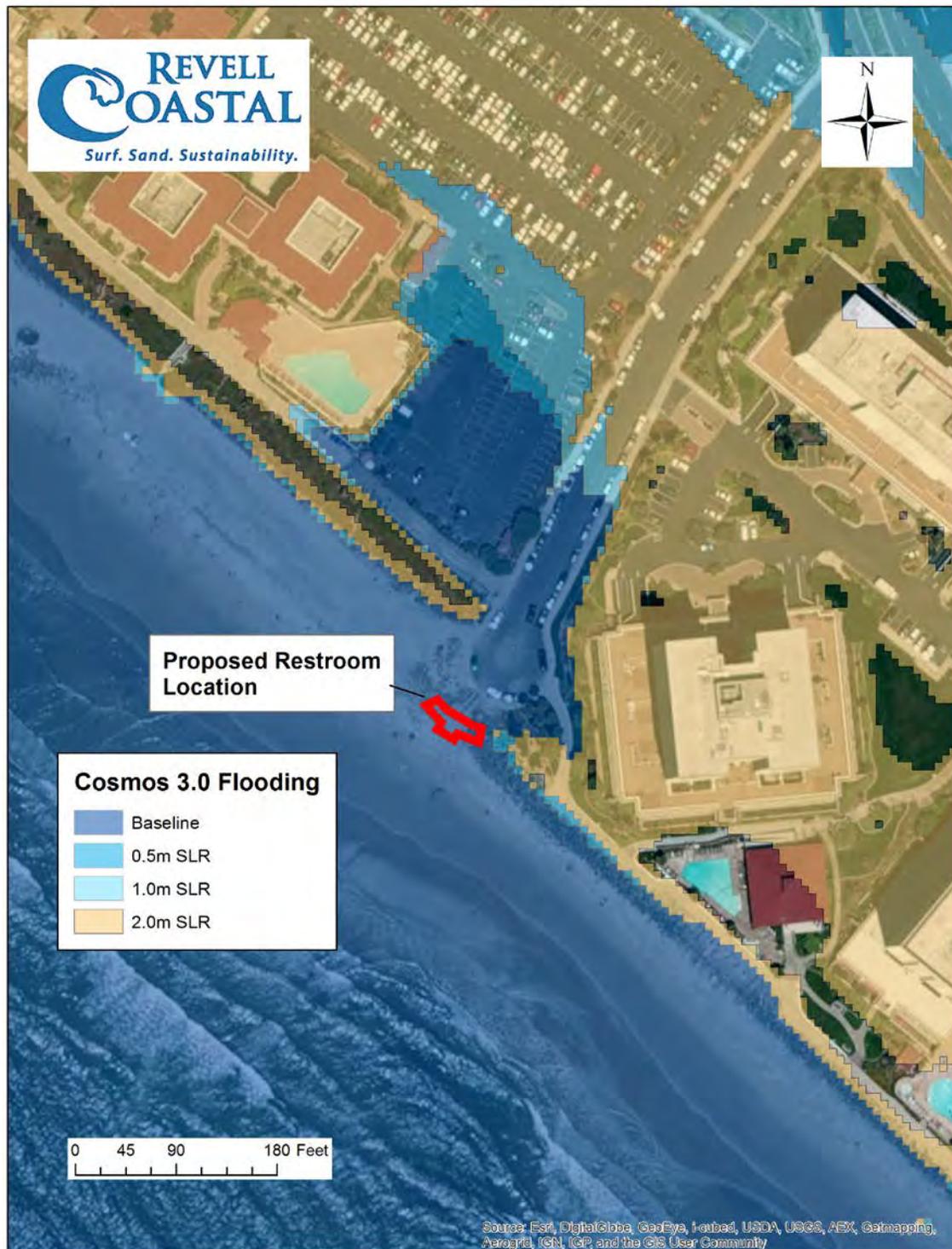


Figure 8. Coastal Flooding Results of the COSMOS 3.0 model showing wave induced coastal flooding for Baseline existing conditions (2010 topography), 0.5 meters, 1.0 meters, and 2.0 meters of sea level rise.

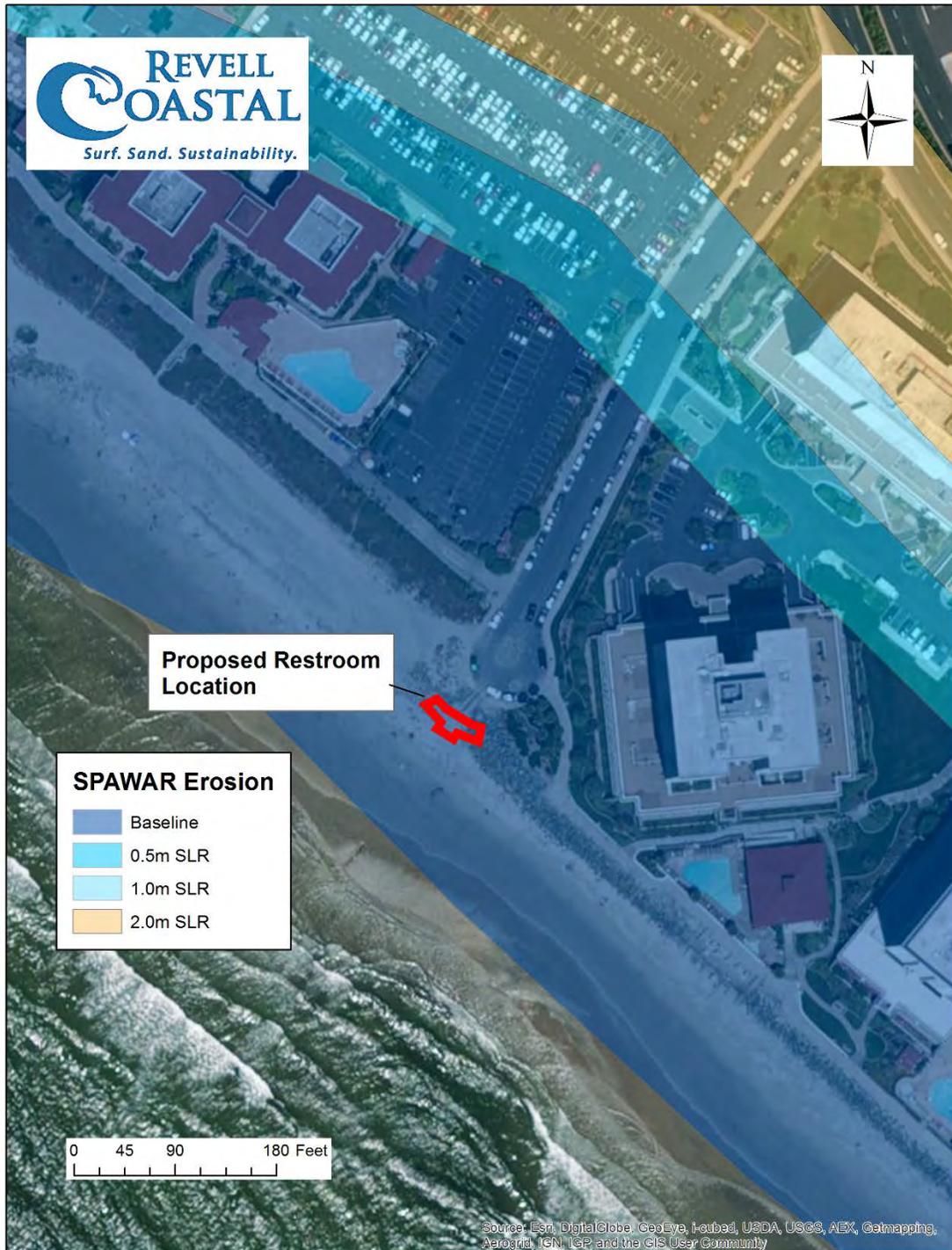


Figure 9. Coastal Erosion results of the SPAWAR model showing erosion from a 100 year wave event for Baseline existing conditions (2010 topography), 0.5 meters, 1.0 meters, and 2.0 meters of sea level rise.

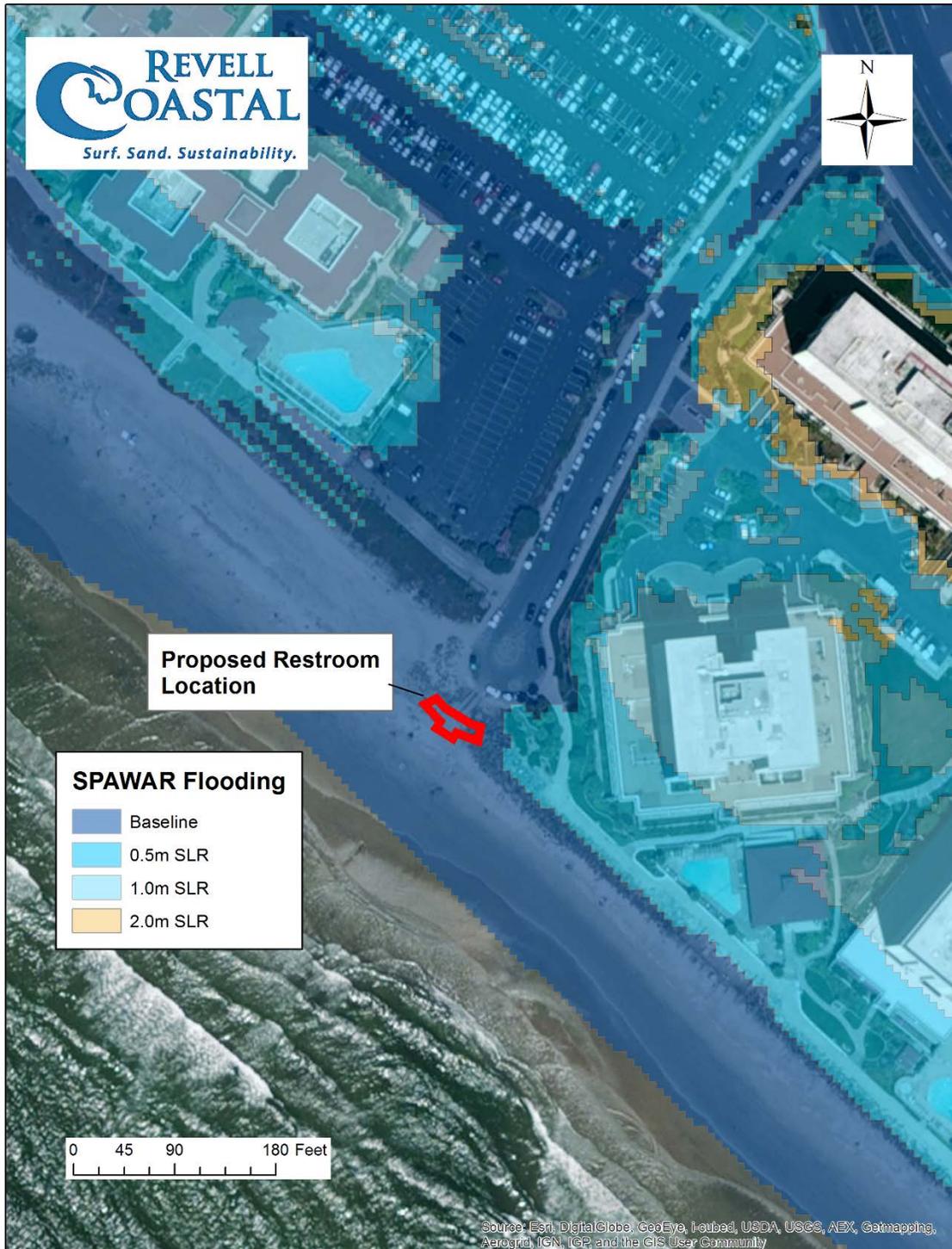


Figure 10. Coastal Flooding Results of the SPAWAR model showing wave induced coastal flooding for Baseline existing conditions (2010 topography), 0.5 meters, 1.0 meters, and 2.0 meters of sea level rise.

Conclusions and Recommendations

Results of all of the analysis show that the proposed location is in an area vulnerable to existing coastal hazard from coastal flooding, beach narrowing and coastal erosion. In the future, these are anticipated to worsen. Two different state of the art coastal hazard and sea level rise efforts (USGS and SPAWAR) vary widely in the extents of coastal flooding in the future. However, both models show that the proposed location is already vulnerable to both coastal erosion and coastal flooding under existing conditions.

The City should consider that this site is already vulnerable to coastal hazards and that the extents, elevations and depths of flooding will increase substantially with sea level rise. Continuing with the construction of the facility may pose escalating maintenance costs and increasing risk of sewage spills and the resultant risk to development and human and ecosystem health.

Revell Coastal recommends the following:

- Consider alternative locations
- Obtain and consider the revised FEMA Open Pacific Coast flood maps, when they become publicly available.
- Obtain and evaluate the Final COSMOS 3.0 hazard layers, when they become available in September 2016 (anticipated).

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http://www.conservation.ca.gov/cgs/geologic_hazards/Tsunami/index.htm

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Terra Costa Group. 2012. Wave Runup Study South Beach Restroom Project Avenida del Sol Coronado, California. Prepared for the City of Coronado. 40 pages

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EXHIBIT B

DAVID L. REVELL, Ph.D.

Principal / Chief Coastal Scientist

Dr. David Revell is a coastal geomorphologist with 20+ years of experience studying marine, coastal and estuarine processes, in particular in the science and management of coastal processes and climate change. He has been involved in a wide variety of contentious community stakeholder processes ranging from evaluating erosion hazard alternatives to climate change vulnerability impacts to lagoon and fisheries management, water quality, and marine spatial planning. Much of his work involves physical process research, and GIS to facilitate communication of science to inform decision making. Dr. Revell has been active in many ground breaking climate change projects including the technical hazards work for the Pacific Institute, The Nature Conservancy's Coastal Resilience projects, and collaborative work in the Monterey Bay region looking at adaptation economics. Dr Revell is currently engaged in many vulnerability and adaptation studies along the California Coast that are in various stages of preparation for the LCP updates. Some of these jurisdictions include: Imperial Beach, Port of San Diego, Carlsbad, Santa Monica, Oxnard, Santa Barbara (city and county), Goleta, Los Osos, Pacific Grove, Monterey (city and county), and Santa Cruz County. He has served as a technical advisor to multiple, state, federal and local jurisdictions related to ocean and coastal management especially at the intersection of how physical processes and human alterations affect hazards, habitats, and human use. David currently advises multiple local jurisdictions on climate change, beach, dune and coastal sediment management, and lagoon processes and inlet management.

Selected Work Experience

Education

Ph.D., Earth Sciences,
University of California,
Santa Cruz 2007

M.S., Marine Resource
Management, Oregon State
University 2000

B.A.s, Geography and
Environmental Studies,
University of California,
Santa Barbara 1996

Principal and Chief Scientist, Revell Coastal, LLC July 2014 - Present

Founded company to provide scientific and technical consulting services to coastal management agencies, local jurisdictions and non-profit organizations. Communicates the best available science to inform better coastal management decisions. Specific project work includes climate change vulnerability and adaptation planning, regional sediment management, and coastal lagoon management and restoration.

Senior Coastal Geomorphologist, Environmental Science Associates (formerly Philip Williams & Associates), Jan. 2008 – July 2014

Managed projects and lead technical analyses on projects related to climate change, coastal lagoons, coastal restoration, sea level rise vulnerabilities, adaptation planning and coastal regional sediment management .

Adjunct Professor, Monterey Institute of International Studies, Aug. 2013 to May 2014

Co-instructed graduate level courses on International Marine Science and Policy and Sustainable Coastal Management. Assist with framing the strategic planning for the Center for the Blue Economy with specific emphasis on climate change opportunities.

Project Scientist, Marine Science Institute, UC Santa Barbara – June 2009 – Present

Coastal research scientist collaborating on a Seagrant investigation of changes to the sandy beach ecosystems in Southern California. Responsible for physical process field data collection, evaluation of historic trends in shoreline and sand volume changes to integrate with ecological changes. Managed graduate student researcher summer 2009 and 2010.

Coastal Scientist, CoastalCOMs & Business Development, Coastal Watch USA, Jan. 2008 – May 2012

International business development of coastal monitoring systems for integrated coastal observation. Identification and development of coastal management data products. Applications of video imagery to nearshore processes, coastal engineering, and marine protected areas with an emphasis on integrating ocean and coastal observations. Focus on coastal processes, ports and harbors, socio-economic data collection. Supported USGS data collection efforts for projects in TRNERR, Goleta Beach, and Surfers' Point.

Postdoctoral Scholar/Research Associate – Institute of Marine Sciences, UCSC Apr. 2007 – April 2008

Researched historic shoreline change along Santa Barbara and Ventura County coasts using a variety of GIS, remote sensing and field collection techniques. Collaborated with USGS, USACE, and BEACON to assess coastal hazards and model sediment transport along the Santa Barbara coast.

Surf 2 Sea Consulting, GIS, Marine and Coastal Processes Consultant – Aug. 2002 – Dec. 2007

Sole proprietor consultant. Contracted with Ecoshore International to develop a beach and groundwater monitoring plan for a passive beach dewatering system in Hillsboro FL (2007). Subconsulted with Moffat and Nichols on Coastal Processes Section of Goleta Beach Environmental Impact Report (2006). Collaborated with PWA on historic shoreline changes to Goleta Beach County Park in Santa Barbara, and helped identify alternative solutions to park protection (2004-05). Worked for oceanfront property owners to assess coastal erosion alternatives and processes affecting property boundaries (2005). Created GIS and planning databases for the City of Bandon in Oregon (2000-03). ---Completed an inventory for the Council for Environmental Cooperation on whale watch operators and guidelines (2002). --- Coordinated the Port Orford Ocean Resources Team GIS project, a community based management effort that interviewed 33 local fishermen and recreational users regarding ocean use, harvest practices, and marine conservation. Digitized interviews into GIS and facilitated socio-economic analyses with Ecotrust (2002-03).

NOAA Coastal Management Fellowship – Aug. 2000 – Aug. 2002

Received a NOAA Fellowship through an extended application process working as a technical advisor to the Oregon Coastal Management Program on littoral cell management planning. Developed coastal hazard GIS inventories for five jurisdictions - Coos, Curry, Lincoln, and Tillamook Counties and City of Bandon. Conducted a hazard assessment for the Bandon Littoral cell. Worked on the Oregon Coastal Atlas project as a member of the Project Development Team. This project collects pertinent GIS and database information for ocean areas, rocky shores, sandy shores, and estuaries, and facilitates various spatial analyses such as hazard assessment through a regional Internet Map Server.

Graduate Research Assistant – Oregon State University - July 1998 – July 2000

Constructed the Netarts Littoral Cell Coastal Hazard GIS inventory for Oregon Sea Grant, Oregon Parks and Recreation Department, Oregon Coastal Management Program, and Tillamook County. This involved survey fieldwork, data processing, GIS, and project management. Facilitated stakeholder workshops to educate, and receive feedback on GIS design and hazard avoidance strategies. Recommended mitigation alternatives to State Parks regarding the Cape Lookout Dune Restoration Project - Section 227 – Army Corp of Engineers.

Selected Project Experience

City of Imperial Beach California, Coastal Vulnerability and Adaptation Planning. Project Director

Revell Coastal is leading a consulting team including USC Seagrant and economists to evaluate future climate change impacts and to develop adaptation strategies for the City of Imperial Beach. As part of this work he has been recently been asked to advise the City on the management of the Tijuana River Estuary which closed this year following the El Niño for the first time in 30 years. This work will include technical

analysis and review of research being conducted by the National Estuarine Research Reserve, and to collaborate with a variety of regulatory stakeholders.

City of Goleta, Local Coastal Program Climate Change Update. *Project Director*

Revell Coastal worked for the City of Goleta to incorporate climate change, coastal hazards, and economics into the Local Coastal Program. Technical work involved modeling, fieldwork, model interpretation, and economics. Policy work was focused on the City's Safety and Conservation Elements from their General Plan and included additional technical fieldwork and review of existing scientific literature.

City of Santa Cruz, San Lorenzo Lagoon Outlet Channel. *Project Director*

During emergency lagoon flooding conditions amidst a regulatory stalemate, Revell Coastal provided on site guidance to construct a temporary outlet channel and reduce lagoon water levels to alleviate flooding while avoiding a rapid dewatering to the lagoon which could have resulted in take of multiple listed species. Revell Coastal continues to advise the City on lagoon mouth management, sand management and lagoon function.

Goleta Slough Management Committee. Goleta Slough Ecosystem Management Plan Update and Sea Level Rise Study, Santa Barbara, California. *Project Manager.* Dr. Revell working with ESA PWA conducted a sea level rise vulnerability and adaptation study for the Goleta Slough. This sea level rise study was incorporated into the Ecosystem Management Plan Update. The work consisted of evaluation of climate related impacts including identification of vulnerabilities to both infrastructure and habitats. Following a series of focus groups, a series of appropriate adaptation strategies were identified including proposed revisions to relevant policies. The entire processes included substantial outreach and education of technical information to planners, elected officials and regulatory agencies. This project was recently awarded the American Planning Association – Central Coastal Chapter award for outstanding regional planning.

The Nature Conservancy, Ventura Climate Change Ecological Vulnerability Assessment, Ventura, CA. *Project Manager.* Dr. Revell working with ESA PWA conducted climate change modeling that examines changes to coastal hazards of flooding and erosion from sea level rise and increased storminess on the Ventura coast. This included modeling changes to sediment yield and fluvial flooding using HEC-RAS by examining changes to precipitation. The coastal and fluvial changes were used as inputs to drive an ecological vulnerability assessment using SLAMM (Sea Level affecting Marsh Model). The technical modeling supports community adaptation planning as well as The Nature Conservancy conservation acquisition program along the Ventura County coast and Santa Clara River Parkway.

Santa Barbara County Land Trust and UCSB. Ocean Meadows Golf Course – Upper Devereux Slough Restoration, UC Santa Barbara, California. *Project Manager.* Dr. Revell working for ESA PWA conducted three phases of conceptual design work to inform the restoration of the Upper Devereux Slough which had been filled in the 1960s to construct a golf course. These first three phases of work improved upon a 2000 Bren School report on the restoration. The first phase evaluated the historic ecology and provided geomorphic interpretation to support restoration of an upland mesa adjacent to the golf course and to ascertain whether the volume of material estimated in the Bren report to be excavated from the golf course could be accommodated on the upland mesa site. The second phase included geomorphic interpretation and initial engineering including conceptual design and cost estimates of an initial grading plan for the upper slough restoration based on the findings that the volume of material required for excavation from the golf course were about half of that calculated in the Bren School report. The third phase focused on hydraulic analyses to specifically examine the potential impacts of the restoration both from the potential to cause scour and damages to the primary access bridge and to also model future water levels and likely functioning of the slough. This work also provided input and guidance on necessary technical studies and recommendations on consideration for future engineering and design.

Monterey Bay Sanctuary Foundation, Monterey Bay Sea Level Rise Vulnerability Assessment, Monterey and Santa Cruz Counties, CA. *Project Manager.* With funding from the California Coastal Conservancy, the Natural Capital Project, and the City of Capitola, Dr. Revell working with ESA PWA modeled projected climate change impacts to the coast of Monterey Bay at a scale suitable for planning purposes. Projected future coastal hazards were mapped which represented an integrated approach of stepping through time eroding the coast and flooding newly eroded areas through hydraulic connectivity. The project was advised by a Monterey Bay region wide technical advisory group comprised of research institutions (UCSC, Naval Postgraduate School, Moss Landing, CSUMB and USGS), local planning agencies (Santa Cruz, Monterey Counties, Cities of Monterey, Santa Cruz, Seaside, Sand City, Capitola), and other technical experts. The study provided estimates of future erosion rates, flood elevations and depths of flooding at various planning horizons into the future. Uncertainty in the projections was addressed by developing a variety of projected impacts then overlapping them and developing an uncertainty index that shows relative risk of impact.

Mission Creek Lagoon and Laguna Channel Restoration. Santa Barbara, CA. *Technical Advisor*
Dr. Revell working with ESA PWA summarized the relevant regional and local site conditions to inform the conceptual level restoration design. This work included review and analysis of relevant historic, existing and future coastal processes along the Santa Barbara Waterfront.

Audubon California, the California State Coastal Conservancy and the Department of Fish and Game, Lower Santa Ynez River Estuary Restoration, Santa Barbara, CA. *Project Manager.* Dr. Revell working with PWA documented historic changes in land uses, hydrology and lagoon functioning to identify potential restoration opportunities to improve the ecological health of the Lower Santa Ynez River Estuary. This assessment summarized the functioning and evolution of habitats based on existing available information and field data. The goal of this project was to identify restoration opportunities to enhance the ecologic value and ensure sustainability of native habitats in the lower Santa Ynez River corridor and estuary (approx. four river miles). One of these restoration actions was funded for design and permitting to improve southern Steelhead habitat. Funding for preliminary design was acquired from California Dept of Fish and Wildlife and design completed before Vandenberg Air Force Base decided to remove support for the project.

Scott & Waddell Creeks Bridge Realignment, Santa Cruz County, CA. *Caltrans Project Manager.* Currently, Highway 1 crosses Scott Creek and Waddell Creek at the interface between the ocean and the creeks' lagoons in Santa Cruz County. Dr. Revell working with ESA PWA evaluated the impact of the existing bridges and various alternative bridge designs and alignments to provide recommendations to Caltrans on design criteria to reduce long term maintenance and impacts to the coastal lagoon habitats of the planned replacement of two bridges located on Highway 1.

Surfrider Foundation, Malibu Lagoon Restoration – Impact Assessment to Surfing Resources, Malibu, CA. *Project Manager.* Dr. Revell reviewed technical studies related to the 2012 Malibu Lagoon restoration to assess the potential impacts of the restoration on surfing and beach conditions. Assessment included review of sediment transport, coastal processes and lagoon breaching dynamics and provided recommendations to alter the project slightly to improve benefits to surfing conditions without disrupting the project permitting and schedule.

Santa Barbara County Parks and Recreation, Goleta Beach Erosion Mitigation, Goleta, CA. *Project Manager.* Studied coastal processes responsible for erosion hotspot at Goleta Beach County Park. Presented research results to stakeholder groups, and participated in technical discussions evaluating erosion mitigation alternatives. Reviewed and commented on Environmental Impact Report. Developed a reconfiguration alternative to avoid erosion hazards through appropriate setbacks, and reviewed technical modeling.

The Association of Monterey Bay Area Governments and the Monterey Bay National Marine Sanctuary, Coastal Regional Sediment Management Plan for Southern Monterey Bay, CA. *Project Manager.* Development of a coastal regional sediment management (RSM) plan for southern Monterey Bay and evaluation of a range of erosion mitigation strategies. RSM plans take a system wide approach to identifying sources of sediment and implementation of strategies to ensure that sediment delivery to the beaches continues.

Neskowin Shoreline Assessment, Neskowin, OR. Tillamook County, *Project Manager.* In response to a high rate of erosion that has diminished the beaches and now threatens homes and roads in Neskowin, OR, ESA analyzed the viability of various coastal erosion mitigation strategies to an eroding shore, utilizing existing information from local academics (Oregon State University) and agencies (including the Geology and Mineral Industries Department), as well as applying our experience completing assessments for similar high-energy wave-exposed coastal areas. The community is striving to find a balance of private property protection with maintenance of a sandy beach to support the tourist economy.

Santa Barbara and Ventura County Coastal Processes Study, CA. *Project Manager.* UC Santa Cruz project manager for collaborative USGS study, involving field data collection to determine historic and seasonal changes to beaches in SB and Ventura Counties.

BEACON Regional Sediment Management Plan. Dr. Revell summarized long term trends, erosion hotspots, quantified the sediment budget, recommended changes to the monitoring program and identified opportunistic project locations.

Ocean Protection Council. Coastal Infrastructure and Vulnerability Impacts Assessment. *Project Manager.* Mapped coastal erosion hazards resulting from sea level rise scenarios, evaluated geomorphic response of various backshore types by applying a total water level methodology, collaborated with climate change researchers at Scripps, organized and engaged peer review team on methods and results, collaborated with Pacific Institute to vulnerability assessment associated with coastal hazards. Results of this work fed directly into the Pacific Institute work called Sea Level Rise Impacts to the Coast of California.

References

Dr. Gary Griggs, University of California, Santa Cruz
griggs@ucsc.edu 831-459-5006

Rachel Couch, California Coastal Conservancy
rachel.couch@scc.ca.gov 831-460-7556

Sarah Newkirk, J.D., The Nature Conservancy
snewkirk@tnc.org 415-730-7437

Andrea Jones, Audubon California
ajones@audubon.org 415-388-2524 ext. 113

Scott Collins, City of Santa Cruz
scollins@cityofsantacruz.com 831-420-5010

Selected Publications

Garner, K.L., Chang, M.Y., Fulda, M.t., Berlin, J.A., Freed, R.E., Soo-Hoo, M.M., **Revell, D.L.**, Ikegami, M., Flint, L.E., Flint, A.L., Kendall, B.L. 2015 (2015). Impacts of sea level rise and climate change on coastal plant species: a case study in the central California coast. PeerJ Prints published online.

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Revell, D.L., R.Battalio, B. Spear, P. Ruggiero, and J. Vandever, 2011. A Methodology for Predicting Future Coastal Hazards due to Sea-Level Rise on the California Coast. *Climatic Change* 109:S251-S276. DOI 10.1007/s10584-011-0315-2.

Orme, A.R., Griggs, G.B., **Revell, D.L.**, Zoulas, J.G., Chenault, C., Koo, H. 2011. Beach changes along the southern California coast during the twentieth century: A comparison of natural and human forcing factors. *Shore and Beach*

Revell, D.L., Dugan, J.E., and Hubbard, D.M. 2011. Physical and ecological responses of sandy beaches to the 1997-98 ENSO. *Journal of Coastal Research*. 27(4)718-730

Barnard, P.L., **Revell, D.L.**, Hoover, D., Warrick, J., Brocatus, J., Draut, A.E., Dartnell, P., Elias, E., Mustain, N., Hart, P.E., and Ryan, H.F., 2009, Coastal processes study of Santa Barbara and Ventura Counties, CA: U.S. Geological Survey Open-File Report 2009-1029, <http://pubs.usgs.gov/of/2009/1029/>

Revell, D.L., Barnard, P. and Mustain, N. 2008. Influence of Harbor Construction on Downcoast Morphological Evolution: Santa Barbara, California. Published in Coastal Disasters '08 Conference, April 2008 North Shore, HI.

Dugan, J.E., Hubbard, D.M., Rodil, I., and **Revell, D.L.** 2008. Ecological Effects of Coastal Armoring on Sandy Beaches. *Marine Ecology*.

Revell, D.L., Marra, J.J., and Griggs, G.B. 2007. Sandshed Management. Special issue of Journal of Coastal Research - Proceedings from International Coastal Symposium 2007, Gold Coast, Australia.

Revell, D. L and Griggs, G.B. 2006. Beach Width and Climate Oscillations along Isla Vista, Santa Barbara, California. *Shore and Beach*. 74(3)8-16.

Revell, D.L., Komar, P.D., Sallenger, A.H. Fall 2002. *An Application of LIDAR to Analyses of El Niño Erosion in the Netarts Littoral Cell, Oregon. Journal of Coastal Research*, ACEC Vol. 18 4:702-801.

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718

August 2, 2017

Ms. Kaitlin Carney
Coastal Program Analyst
California Coastal Commission
San Diego Coast District Office
7575 Metropolitan Drive, Suite 103
San Diego, CA 92108-4402

Re: Public Hearing, Wednesday August 9, 2017
AGENDA ITEM NO: W20a
City of Coronado Coastal Permit A-6-COR-16-0097

Dear Kaitlin:

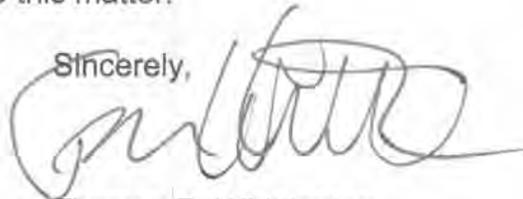
In accordance with the Public Hearing Notice provided by your office, please find enclosed our submission in the above referenced matter.

Rather than a legal brief I have communicated my points in a conversational fashion, forgone extensive exhibits and limited the issues addressed.

I will be sending an electronic copy of the submission today with this written copy to follow tomorrow for early arrival via UPS.

Thank you for your attention to this matter.

Sincerely,



Thomas D. Whittington

TDW/tdw

Enclosure

Agenda Number: 20a
Item NO: W20a
Application A-6-COR-16-0097
Applicant City of Coronado
Thomas D. Whittington
La Sierra 1504 LLC
Appeal A-6COR-16-0097
OPPOSITION TO PROJECT

My apologies to the Commission for not presenting in person. Unfortunately I have commitments in Paris with my granddaughters that were made over a year ago.

I am supportive of the Staff recommendation for the reasons it articulates and if present would personally testify that the proposed project will create scour at the site, violate SANDAG, the City process failed to follow its internal procedures, the visual impact is negative and the City failed to review equally suitable or superior sites without the problems of the proposed site. A factor that the Staff may not be able to consider, but which I believe may be relevant to the Commission, is the fact that the City does not have the claimed fee simple interest in the proposed site. I divide my comments into Title, Boundary Agreement and Seawall.

Title - My primary concern is that the City of Coronado (City) does not have sufficient property rights to construct the facility it proposes in the location it proposes – the public records show that the fee simple interest in the property belongs to Coronado Shores (Shores) and the State of California.

My secondary concern is that the City continues to avoid the issue of establishing ownership. In a loud, clear, but respectful, voice, I have asked the City to show me the beef! Or more specifically I have asked the City to show me it's Title Policy or a Title Certification or even the Title Search as proof that it has a right to use the site proposed for its facility. I have been asking for over five years and so far the City has not produced any Title work. Hopefully the City has provided the Staff or Commission with appropriate Title work putting this matter to rest; if not, let me share my frustration with you, sort of in reverse order so that it will highlight what the City is trying to avoid.

In its presentation dated 11/15/16, the City noted inter alia that I questioned ...*"whether the City has the right to construct a restroom at the proposed location and asks to see the Title"*....it then notes that *".....without providing any evidence that any other person owns this land."* The City then goes into an argument advanced by one of its engineers that a series of Maps ...*"granted and gifted fee title of Avenida del Sol to the City of Coronado for any public purpose, and no other document is required to demonstrate the City's ownership of the project site."* I am from a part of the world where a Whopper told with a straight face is an art form, whoever wrote this would do well there. Most everything set out is true until they get right to the *"....and no other document is required."*

And let's talk about the reference to "fee title of Avenida del Sol". It is possible that in the mass of documents that were created as the Coronado Shores and Coronado Sands projects moved back and forth between multiple owners and lenders over forty years ago that the City picked up some property rights; but as a simple dirt lawyer who morphed into a developer¹, the possibility that the City got fee simple ownership was very remote – and if it did let's see the proof.

The answer to the question posed by the City in its submission is that the Title to the area that the City wants to desecrate, at least that portion not owned by the State of California, is currently owned by Coronado Shores Condominium Association Number 2. After multiple requests of the City, I am a bit suspicious of its veracity when the City says in a clear writing that it's the owner, but doesn't simply have that claim verified by someone knowledgeable in real property law. To be fair the straightforward ownership of the Hotel del Coronado and the attached land which became the Shores became complex as the Coronado Bridge was becoming reality. A developer bought the land and the Hotel Del, spun off the hotel and negotiated with the City to construct 2,000 luxury condominium type apartments on beach front sites. It's all in the County records or you can look at *The Development of The Coronado Shores A History* by Ed Sack

As an observation, the documents reviewed by all parties are impacted by the City of San Diego Subdivision Manual dated 1967. Based on the new 1972 Subdivision Map Act, the Manual was updated in 2013 and titled Mapping & Land Title Document Preparation Manual. I get the impression someone is unartfully applying that Manual to the property documents relevant here.

Going back a step farther, I sent several extensive public records requests where I attempted to generate every document that the City had related to the Title to the proposed site. My interaction with the City employees was cordial and they were always helpful. After looking at all of the basic documents, I submitted a final public records request for anything related to title in as many ways as I could dream up and the only issue of interest that came up was an e-mail from Mr. Walton regarding his view of the Title.

Because I could not find proof that the Title was in the City and it seemed that the City did not have any Title work, I wrote to the Assistant City Manager with a copy to the City Manager explaining why the City's title was questionable. I referenced Mr. Walton's analysis and my interest in sitting with anyone who could explain to me how the City had Title:

From: Ritter, Tom [mailto:tritter@coronado.ca.us]
Sent: Monday, October 24, 2016 11:33 AM
To: Thomas D. Whittington Jr.
Cc: King, Blair; 'blair.king@coronado.ca.us'; Clifford, Mary
Subject: RE: Restroom Proposal

Mr. Whittington, thank you for your email. The City Clerk will respond to your questions in regards to public records. I will forward your other concerns on to our legal counsel.

Sincerely, Tom Ritter

Tom Ritter
Assistant City Manager
City of Coronado
1825 Strand Way, Coronado CA 92118
619-522-7330
tritter@coronado.ca.us
Follow Coronado:   

From: Thomas D. Whittington Jr. [<mailto:tdw@delawarelawyer.com>]
Sent: Sunday, October 23, 2016 7:21 PM
To: Ritter, Tom <tritter@coronado.ca.us>
Cc: King, Blair <blair.king@coronadoca.gov>; Thomas D. Whittington Jr. <tdw@delawarelawyer.com>; 'blair.king@coronado.ca.us' <blair.king@coronado.ca.us>
Subject: Restroom Proposal

Tom I have worked my way through the various documents sent to me as a result of my public records requests – all of them. It would appear that the rights of the City of Coronado on the lands proposed for the south beach facilities do not include the right to build structures other than replace the sewer, road and drains originally constructed by the Coronado Development Company. If City has documentation that defines a right in the City to construct a building such as is proposed or that expands the Agreement between the Shores, State Lands Commission and the City regarding the relevant easements and dedications I request an opportunity to sit with them and review the documentation – I don't see it.

I understand that you believe that Avenida del Sol was a "Dedication", not an "Easement" and that somehow the dedication status permits the City to do whatever it wants with the right of way. Document 5115 clearly describes "an easement" and nothing I have seen in all of the considerable documentation provided me, be it easement or dedication or public right of way grants the City the right to actually construct a significant structure on the Avenida del Sol right of way. I am still working my way through the documents available to me via Coronado Shores, but I want to be clear that I do not see anything in the documentation sent to me by the City which grants the City a right to build nor have I seen a title search or legal opinion supporting that right. The only document that I have seen which even considers the issue of the right of the City is the attached Memo dated March 13, 2014 from Mr. Walton to you and Mr. King. I have read Mr. Walton's memorandum and looked carefully at the maps and it is accurate that from an engineering perspective it might show "... a location for the possible restroom....".

I know two Ed Waltons who are engineers, if your Mr. Walton who I do not recall meeting is as careful as my Mr. Walton, I assume that once he identified the possible construction location that someone did title work to confirm the right of the City to construct on the right of way and that the location did not violate the boundary Agreement with the State of California. If you know of a title search, title policy or title opinions please send me a copy or in the alternative if you have someone who actually believes that they can show that the City has the right to use the proposed location for a building housing showers, restroom facilities, storage and the like I would be pleased to sit with them and review the evidence. Yes I know that I have said this twice, but at an appropriate time I want to make sure I conveyed my message.

I am sending along the letter accompanying the documents produced as a result of my Public Records Act request. You can see that my request was both targeted and comprehensive. I assume, unless the documents were withheld as privileged, that what I have been sent is the entire span of information available to the City regarding its interest (here I use the term "interest" to refer to any rights that the City has, not the interest as a result of the attractions of the beach) in the property. If someone will verify that the appropriate documents have been produced, please have them direct me to the documents the City is relying on. All of the documents provided me are available from my Drop Box account or Ms. Clifford.

My goal here is to avoid what will be expensive litigation for the City in which it will be required to prove exactly what I am asking for – documentation that the City has the correct property right interest to construct a structure on land held in fee by Coronado Shores in which the City has been granted specific limited rights. I am willing to speak to anyone at a mutually convenient time who can show me the error of my conclusion that the City plans to build on Coronado Shores land without a legal right to do so.

Thank you for your attention to my concerns.

Thomas D. Whittington

When nothing was forthcoming, I visited the San Diego Public Records web site, personally went to the office where deeds were recorded and asked a Title Insurance Company to generate documents which showed the interest of the City – nothing came to light and I have concluded it's not there. Effectively the City wants to construct its bad idea on property it does not own.

The history and motivation behind this project is interesting. The City of Coronado is one of my favorite places in the Universe and I am a bit confused as to why it continues to push a clearly flawed plan with several obviously better alternatives. My involvement in the restroom issue goes back to 2004 when a similar facility was proposed for the Shores Las Arenas parking area. During this time, I was on the Boards of the Las Flores Association which is adjacent to Las Arenas and the L&R Committee which manages the common areas of the Shores. The Shores contains between 30 and 35% of all residential housing units in the City and the resident's reactions were mixed. There are clearly benefits for everyone, but the objections included view, managing the users and the lack of ownership (understood as control) in the City. Based on the documents archived at the Shores and put forward at that time by the City, it was clear that the City had no absolute right to construct on the parking lot and the idea went away.

But why did it go away, with a reasonable negotiator, the City could have worked out an agreement with the Shores to everyone's benefit. When a similar proposal surfaced again some seven years ago the Shores consensus was not a resounding objection; rather, the objections centered on having a poorly thought out plan of the City jammed down the throats of the Shores. I attended a public hearing 5 years ago and raised two issues. First, why not seek input from the Shores committees and associations rather than attempt to jam the project down the collective throats of the Shores. Second, if the plan is to build the facility without

regard for the rights of the Shores, show me the ownership rights of the City. I specifically asked for a copy of the Title Search. I was promised a copy of the Title Search and/or Title work and, as noted, I am still waiting and, as far as I can determine, the City has no right.

BOUNDARY AGREEMENT - Even if this body and/or the Courts conclude that the City has rights to the proposed Site, it still may not build without the approval of the Shores and the State. Based on the preliminary sketches submitted with the request for Permit approval, it appears that a portion of the Site is subject to the Boundary Agreement between the Shores developer, the City and the State of California. The history of the Boundary Agreement is instructive regarding the misunderstanding of the City as to its ownership regarding the Shores beach. In addition, it supports the position advocated above that the City's claim of ownership of the Site property is defective.

SEAWALL - If the prior two claims regarding title do not establish that the City is in error claiming ownership, it will need to explain how its use of the Property under the proposed Site does not violate the Agreements with the State of California and the Shores Developers regarding the Seawall the developers were required to construct as an element of seeking permission for the Shores. A review of the documents appears to show that a portion of the Proposed Site infringes on the Seawall location and the rights of the various entities establishing the Seawall.

In conclusion, if the presentation of the City of Coronado does not contain a title report by a certified title company, it is substantially certain that the City does not own nor have the right to construct the facility it proposes on the Shores Beach.

Respectfully submitted,

Thomas D. Whittington

1. As to the City's claim that I need to prove it does not have the rights it claims to the foot of Avenida del Sol, I respectfully disagree. I am truly puzzled by why the City doesn't have a title search done and obtain a policy of title insurance. You don't know me and I have only been in the California Courts a few times, but I have spent a lot of time on matters that relate to this issue; specifically early in my legal career I represented the Delaware Department of Natural Resources and Environmental Control, the Environmental Appeals Board, the Coastal Zone Industrial Control Board and defended the Coastal Zone Act, represented multiple governments in setting up first time homebuyer mortgage programs including the State of Delaware, New Castle County, Sussex County and other States from New York to Miami, numerous Home Builders, the local Homebuilders Association and property owners from Colorado to South Carolina, Florida to Vermont. About 20 years ago I partnered in a development Company that has participated in the construction of over 5,000 homes. So I have seen all sides of the complex issues where the environment, politics, money and site development meet. Under no circumstances would I undertake a project, or let a client undertake a project, on an engineer's guess that the client could build a multi-million dollar project without obtaining a Title policy.

From: jengazelle@aol.com
To: [Carney, Kaitlin@Coastal](mailto:Carney_Kaitlin@Coastal)
Subject: Re: Coronado Resident against Coronado Beach restrooms.
Date: Tuesday, August 01, 2017 8:20:20 AM

Item No:W20-a
Permit: A6-COR-16-0097
Jennie Portelli
814 Glorietta Blvd.
Coronado, Ca. 92118
OPPOSED

Hi Kaitlin,

I received the Public Hearing Notice and thank you for sending it to me due to my interest in January.

I am opposed to any kind of restroom at that location. The storms will wear away at the 1000 sq. ft. plaza and the restrooms themselves in a short time...with or without a rise in sea level. It appears to be larger then ever and since when does the restroom need showers?

The temporary porta potties are adequate, along the street curb and do no obstruct the view.

Sincerely,

Jennie Portelli

Coronado Resident

-----Original Message-----

From: jengazelle <jengazelle@aol.com>

To: kaitlin.carney <kaitlin.carney@coatal.ca.gov>

Sent: Thu, Feb 9, 2017 8:43 am

Subject: Coronado Resident against Coronado Beach restrooms.

I support the Coronado Shores residents against the beach restroom on the public beach. This restroom will obstruct the beach view and most likely will be washed away by the winter storms. The temporary restrooms work fine and the Hotel del could step up to maintain these restrooms.

The Hotel del complains about the beachgoers using their restrooms. The del should build the restroom on their property which is on higher ground.

I am a life long resident of Coronado, and home owner (not at the Shores).

Thank you for your consideration.

Jennie Portelli

814 Glorietta Blvd.

Coronado, Ca.

KC

7-25-17
Favor of project
No W 20a

Coastal Commission Staff,

I am a residence of building 1720. Most of the people in building 1720 that oppose the construction of public restroom are old self-centered people who do not use the beach. People in the other nine building are in favor of the construction because many people who are not residents of the Coronado Shores complex are using our restrooms. They are also using our bushes to urinate.

I was a lifeguard for many years on this beach and the most common question asked by people on the beach is where are the restrooms. Also people want a shower to wash off their feet before they get into their car.

There was a government survey made of sand flow on San Diego County beaches several years ago. Coronado beach was the only beach getting bigger because of sand flowing from Imperial Beach.

RECEIVED

JUL 28 2017

CALIFORNIA
COASTAL COMMISSION
SAN DIEGO COAST DISTRICT

Sincerely,

Russell V. Elwell

1720 Avenida del Mundo #807

Coronado, CA. 92118