CALIFORNIA COASTAL COMMISSION
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W23b

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STAFF REPORT: REGULAR CALENDAR

Application No.:	**5-19-0128**
Applicant:	**Hermosa Beach City School District** **ATTN: Patricia Escalante**
Location:	417 25th Street, Hermosa Beach, Los Angeles County (APNs: 4182-028-900 & 4182-029-902)
Project Description:	Demolition of existing elementary school campus and reconstruction of a new campus consisting of a 2-story classroom and administration building, a 2-story multi-purpose building, an on-site parking lot, play areas, and associated school improvements.
Staff Recommendation:	Approval with conditions

SUMMARY OF STAFF RECOMMENDATION

The Hermosa Beach School District proposes to demolish and reconstruct the North School campus in the City of Hermosa Beach. The purpose of the proposed project is to upgrade the existing campus, originally built between 1924 and 1958, in its existing location. There is no previous permit history on the subject site. The primary Coastal Act issues raised by this project relate to water quality, biological resources, public access and recreation, community character and visual resources, and cultural resources.

The subject site is less than ¼-mile from the public beach (Exhibit 1). The applicant is proposing to demolish the entire campus, which currently consists of five buildings and existing hardscaping, and to construct a new school campus intended for grades 3-4, with a library/learning center, 15 classrooms, and two labs.

There is opposition to the proposed project from nearby residents, primarily focused on adverse impacts to traffic and the placement of additional restrictions on existing public on-street parking.

The traffic study for the proposed project found that the project is likely to create worsened traffic conditions for short periods of time for nearby residents and drivers who pass near the school site directly before and after the school day. However, the primary traffic impacts will occur on weekdays in the early morning and early afternoons primarily outside the prime summer beach use season. Furthermore, Gould Avenue, the primary east/west street that may be impacted by the project, is only one of many east/west streets that beach users can take to access the City's beaches from Pacific Coast Highway. Thus, the circulation impacts resulting from the construction and use of the new school campus are unlikely to significantly adversely impact beach access.

The City of Hermosa Beach has historically experienced a shortage of parking due to competing parking demands of beach-goers, customers of commercial establishments, and the surrounding residential uses which range from low to high density. In order to alleviate those parking demands, the City proposed, and the Commission approved, a parking management plan, which has been in place for nearly 40 years. All of the existing public on-street parking spaces adjacent to the project site are included in the City's parking management program and are currently restricted to a maximum of one hour without a resident or day-use pass between May 15 and September 15 each year. Currently, there are 35 public on-street parking spaces adjacent to the project site. As proposed, the school reconstruction will result in one additional on-street public parking space through changes to the entry and exit access driveways points. However, all 36 of the post-project public parking spaces are proposed to be restricted to allow for safe drop off/pick up during school days. Specifically, on school days between 8 AM and 9 AM and between 2:30 PM and 3:30 PM, parking will be prohibited in 19 of the parking spaces adjacent to the site in order to increase safety for students and only loading will be allowed in the 17 identified pick up/drop off parking spaces.

The new restrictions have the potential to adversely impact the existing on-street public parking spaces, which are within an easy walk of the beach and are available with limited restrictions eight months out of the year. To mitigate the impacts to public beach parking, the applicant has proposed the following related to public parking in the on-site parking lot: "*No Parking During School Hours from 7AM-6PM*" and "*3-Hr Parking Max after school hours, weekends, and holidays*." Special Condition 6 of this permit incorporates the City's proposal to allow parking from 6:00 PM to 7:00 AM during school days for a maximum of three hours. However, the special condition requires that the parking spaces be available for use by the public on holidays, weekends, and during the summer at all times except between 2:00 AM and 4:00 AM on those days with no maximum stay.

The potential for impacts to water quality issues arise because the applicant is proposing significant grading. To ensure the protection of water quality both during and post-construction, Special Conditions 3 and 4 require the applicant to submit a Construction and Pollution Prevention Plan and Post-Development Runoff Plan, respectively.

The applicant is proposing to remove 12 existing, mature, non-native trees throughout the campus, and to plant 45 new trees throughout the campus. To avoid potential impacts to breeding activities of sensitive bird species during the nesting season, Special Condition 5 requires a qualified biologist to conduct a survey for active nests no more than 72 hours prior to any tree removal. Special Condition 2 requires final landscape plans that use drought-tolerant, native or non-invasive species.

While the proposed new campus will have the same number of classrooms/labs as the existing campus, the total area of the new buildings will be significantly greater. However, there are no

public views that will be impacted by the new proposed school campus. Special Condition 1 requires the submittal of final plans to ensure that they are in conformance with the proposed plans.

The City of Hermosa Beach has a certified Land Use Plan (LUP), which is used as guidance; however, the City has not yet completed, nor has the Commission reviewed, any implementing ordinances. Thus, the City's LCP is not fully certified, and the standard of review for the proposed development is the Chapter 3 policies of the Coastal Act.

As conditioned, the proposed development will not have any adverse impacts on coastal resources and meets the standards set forth in the Coastal Act and the City of Hermosa Beach LUP. Therefore, Commission staff recommends **approval** of coastal development permit application 5-19-0128, as conditioned.

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APPENDICES

EXHIBITS

I. MOTION AND RESOLUTION

Motion:

*I move that the Commission **approve** Coastal Development Permit Application No. 5-19-0128 pursuant to the staff recommendation.*

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:

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

II. STANDARD CONDITIONS

This permit is granted subject to the following standard conditions:

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

III. SPECIAL CONDITIONS

This permit is granted subject to the following special conditions:

1. **Final Plans.** PRIOR TO THE ISSUANCE OF THIS COASTAL DEVELOPMENT PERMIT, the applicant shall submit to the Executive Director for review and written approval final project plans that are in substantial conformance with the preliminary plans submitted by SVA Architects dated June 6, 2018.

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

2. **Final Landscape Plans**. PRIOR TO THE ISSUANCE OF THIS COASTAL DEVELOPMENT PERMIT, the applicant shall submit to the Executive Director, for review and written approval, final landscape plans for the proposed development. Said plans shall be in substantial conformance with the landscape plan submitted by Architerra Design Group on December, 7, 2018, and shall include the following:

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

   b. Use of reclaimed water for irrigation is encouraged. If using potable water for irrigation, only drip or microspray irrigation systems may be used. Other water conservation measures shall be considered, such as weather based irrigation controllers.

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

3. **Construction and Pollution Prevention Plan.** PRIOR TO CONSTRUCTION, the applicant shall submit, for the review and written approval of the Executive Director, a final Construction and Pollution Prevention Plan prepared and certified by a qualified licensed professional. The final Plan shall demonstrate that all construction, including, but not limited to, clearing, grading, staging, storage of equipment and materials, or other activities that involve ground disturbance;

building, reconstructing, or demolishing a structure; and creation or replacement of impervious surfaces, complies with the following requirements:

a. Minimize Erosion and Sediment Discharge. During construction, erosion and the discharge of sediment off-site or to coastal waters shall be minimized through the use of appropriate Best Management Practices (BMPs), including:

    1. Land disturbance during construction (e.g., clearing, grading, and cut-and-fill) shall be minimized, and grading activities shall be phased, to avoid increased erosion and sedimentation.

    2. Erosion control BMPs (such as mulch, soil binders, geotextile blankets or mats, or temporary seeding) shall be installed as needed to prevent soil from being transported by water or wind. Temporary BMPs shall be implemented to stabilize soil on graded or disturbed areas as soon as feasible during construction, where there is a potential for soil erosion to lead to discharge of sediment off-site or to coastal waters.

    3. Sediment control BMPs (such as silt fences, fiber rolls, sediment basins, inlet protection, sand bag barriers, or straw bale barriers) shall be installed as needed to trap and remove eroded sediment from runoff, to prevent sedimentation of coastal waters.

    4. Tracking control BMPs (such as a stabilized construction entrance/exit, and street sweeping) shall be installed or implemented as needed to prevent tracking sediment off-site by vehicles leaving the construction area.

    5. Runoff control BMPs (such as a concrete washout facility, dewatering tank, or dedicated vehicle wash area) that will be implemented during construction to retain, infiltrate, or treat stormwater and non-stormwater runoff.

b. Minimize Discharge of Construction Pollutants. The discharge of other pollutants resulting from construction activities (such as chemicals, paints, vehicle fluids, petroleum products, asphalt and cement compounds, debris, and trash) into runoff or coastal waters shall be minimized through the use of appropriate BMPs, including:

    1. Materials management and waste management BMPs (such as stockpile management, spill prevention, and good housekeeping practices) shall be installed or implemented as needed to minimize pollutant discharge and polluted runoff resulting from staging, storage, and disposal of construction chemicals and materials. BMPs shall include, at a minimum:

        a. Covering stockpiled construction materials, soil, and other excavated materials to prevent contact with rain, and protecting all stockpiles from stormwater runoff using temporary perimeter barriers.

        b. Cleaning up all leaks, drips, and spills immediately; having a written plan for the clean-up of spills and leaks; and maintaining an inventory of products and chemicals used on site.

c. Proper disposal of all wastes; providing trash receptacles on site; and covering open trash receptacles during wet weather.

d. Detaining, infiltrating, or treating runoff, if needed, prior to conveyance off-site during construction.

2. Fueling and maintenance of construction equipment and vehicles shall be conducted off site if feasible. Any fueling and maintenance of mobile equipment conducted on site shall take place at a designated area located at least 50 ft. from coastal waters, drainage courses, and storm drain inlets, if feasible (unless those inlets are blocked to protect against fuel spills). The fueling and maintenance area shall be designed to fully contain any spills of fuel, oil, or other contaminants. Equipment that cannot be feasibly relocated to a designated fueling and maintenance area (such as cranes) may be fueled and maintained in other areas of the site, provided that procedures are implemented to fully contain any potential spills.

c. Minimize Other Impacts of Construction Activities. Other impacts of construction activities shall be minimized through the use of appropriate BMPs, including:

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

2. Soil compaction due to construction activities shall be minimized, to retain the natural stormwater infiltration capacity of the soil.

3. The use of temporary erosion and sediment control products (such as fiber rolls, erosion control blankets, mulch control netting, and silt fences) that incorporate plastic netting (such as polypropylene, nylon, polyethylene, polyester, or other synthetic fibers) shall be avoided, to minimize wildlife entanglement and plastic debris pollution.

d. Manage Construction-Phase BMPs. Appropriate protocols shall be implemented to manage all construction-phase BMPs (including installation and removal, ongoing operation, inspection, maintenance, and training), to protect coastal water quality.

e. Construction Site Map and Narrative Description. The Construction and Pollution Prevention Plan shall include a construction site map and a narrative description addressing, at a minimum, the following required components:

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

2. A description of the BMPs that will be implemented to minimize land disturbance activities, minimize the project footprint, minimize soil compaction, and minimize damage or removal of non-invasive vegetation. Include a construction phasing schedule, if applicable to the project, with a description and timeline of significant land disturbance activities.

3. A description of the BMPs that will be implemented to minimize erosion and sedimentation, control runoff and minimize the discharge of other pollutants resulting from construction activities. Include calculations that demonstrate proper sizing of BMPs.

4. A description and schedule for the management of all construction-phase BMPs (including installation and removal, ongoing operation, inspection, maintenance, and training). Identify any temporary BMPs that will be converted to permanent post-development BMPs.

f. Construction Site Documents. The Construction and Pollution Prevention Plan shall specify that copies of the signed CDP and the approved Construction and Pollution Prevention Plan be maintained in a conspicuous location at the construction job site at all times, and be available for public review on request. All persons involved with the construction shall be briefed on the content and meaning of the CDP and the approved Construction and Pollution Prevention Plan, and the public review requirements applicable to them, prior to commencement of construction.

g. Construction Coordinator. The Construction and Pollution Prevention Plan shall specify that a construction coordinator be designated who may be contacted during construction should questions or emergencies arise regarding the construction. The coordinator's contact information (including, at a minimum, a telephone number available 24 hours a day for the duration of construction) shall be conspicuously posted at the job site and readily visible from public viewing areas, indicating that the coordinator should be contacted in the case of questions or emergencies. The coordinator shall record the name, phone number, and nature of all complaints received regarding the construction, and shall investigate complaints and take remedial action, if necessary, within 24 hours of receipt of the complaint or inquiry.

The permittee shall undertake development in accordance with the approved Construction-Phase Pollution Prevention Plan, unless the Commission amends this permit or the Executive Director provides written determination that no amendment is legally required for any proposed minor deviations.

4. **Post-Development Runoff Plan**. PRIOR TO CONSTRUCTION, the applicant shall submit, for the review and written approval of the Executive Director, a final Post-Development Runoff Plan. The final Post-Development Runoff Plan shall finalize and include the conceptual Grading and Drainage Plan prepared by BkF Engineers and dated 2017, and the Stormwater Quality Design Measure Calculations, prepared June 14, 2017 by BkF Engineers, referenced and included in the project Environmental Impact Report (EIR). The final plan shall comply with, at minimum, all the requirements and standards cited in the 2014 Los Angeles County Low Impact

Design Manual, and the August 2010 Los Angeles County Stormwater Best Management Practice Design and Maintenance Manual.

The permittee shall undertake development in accordance with the Post-Development Runoff Plan, unless the Commission amends this permit or the Executive Director issues a written determination that no amendment is legally required for any proposed minor deviations.

5. **Sensitive Species Survey**. PRIOR TO COMMENCEMENT OF ANY CONSTRUCTION ACTIVITIES**,** during bird nesting season (February 1st through September 15th), a qualified biologist shall conduct a site survey for active bird nests no more than 72 hours prior to any development. If an active nest of a special-status species or species protected by the federal Migratory Bird Treaty Act (MBTA) or the California Fish and Game Code is located, then a qualified biologist shall monitor the nest daily until project activities are no longer occurring within a distance of the nest appropriate to the sensitivity of the species, and determined in consultation with the California Department of Fish and Wildlife (typically 300 ft. for most species, up to 500 ft. for raptors), or until the young have fledged and are independent of the adults or the nest is otherwise abandoned. Limits of construction around active nests shall be established in the field with flagging, fencing, or other appropriate barriers and construction personnel shall be instructed on the sensitivity of nest areas. The monitoring biologist shall halt construction activities if he or she determines that the construction activities may be disturbing or disrupting the nesting activities. The monitoring biologist shall make practicable recommendations to reduce the noise or disturbance in the vicinity of the active nests or birds. This may include recommendations such as turning off vehicle engines and other equipment whenever possible to reduce noise, working in other areas until the young have fledged, or utilizing alternative construction methods and technologies to reduce the noise of construction machinery. The monitoring biologist shall review and verify compliance with these avoidance boundaries and shall verify that the nesting effort has finished in a written report. Unrestricted construction activities may not resume until the biologist confirms no active nests are found.

6. **Parking Management Program and Parking Signage Plan.** PRIOR TO THE ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicant shall submit to the Executive Director for review and approval a parking management program and parking signage plan that includes, at a minimum, the following:

   a. A minimum of forty-one (41) spaces in the onsite school parking lot shall be available for use by the general public on weekends, school holidays, and the summer season between the last and first day of the regular school calendar. Said 41 parking spaces shall be available for use by the public on the designated days at all times except between 2:00 AM and 4:00 AM of any day, with no maximum stay.

   b. A minimum of forty-one (41) spaces in the onsite school parking lot shall be available for use by the general public on school days during the regular school calendar. Said 41 parking spaces shall be available for use by the public on the designated days from 6:00 PM to 7:00 AM, for a maximum of three hours.

c. Signage shall be installed informing the public of the availability of this lot. The signage shall consist of one 24 in. by 36 in. permanent sign installed at the entrance to the parking lot.

d. No fee will be charged for public usage of the parking lot.

e. Leasing or rental of any of the 41 parking spaces for any period of time is prohibited.

f. Prior to making changes to school programming that would result in a reduction in the number of days that the parking lot is available to the public, the applicant must contact the Executive Director to determine whether an amendment to this Coastal Development Permit will be required.

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

IV. FINDINGS AND DECLARATIONS

A. PROJECT LOCATION & DESCRIPTION

The project site is located in the northern part of the City of Hermosa Beach, less than ¼-mile from the public beach (Exhibit 1). The proposed North School site consists of two parcels, both owned by the School District. The eastern parcel is currently used primarily as a public park. The western parcel is currently developed with the existing school buildings. The designated land use of the project site is Public Facility and Open Space. The site is zoned Unclass (School District) and OS (Open Space). The Hermosa Beach certified Land Use Plan (LUP) designates the project site Schools and Parks. As proposed, the new campus would cover approximately 2.35 acres of the combined 4.29-acre site. The site is irregularly shaped and residential development interjects into the school site on portions of 25th Street and 26th Street (Exhibit 2).

The proposed project is for the demolition of five existing buildings, totaling approximately 28,900 sq. ft. and removal of approximately 57,560 sq. ft. of hardscaping, and construction of a new school campus intended for grades 3-4 with a library/learning center, 15 classrooms, and a two labs. Although the proposed new campus will have the same number of classrooms/labs as the existing campus (17), the total area of the new buildings will be significantly greater. New construction will consist of a 31,469 sq. ft., 30 ft. high two-story classroom and administration building (main building), a 5,507 sq. ft., 26 ft. 10 in. high two-story multipurpose building, a 41-space parking area, play areas, and associated school improvements. The parking area will be equipped with conduits and pull-boxes to allow future installation of electrical vehicle charging stations. An asphalt playground is proposed between the two buildings, and a natural turf field is proposed to be installed in the eastern portion of the site. The existing school site is located approximately 16 ft. higher in elevation than the adjacent park. As proposed, an approximately 240 ft. long, primarily 1-2 ft. high retaining wall would be constructed on the sandy slope that separates the school site and

the adjacent 4.4 acre park and approximately 1,000 cubic yards of soil will be imported to create a level area in order to support the eastern portion of the proposed natural turf field. Construction of the proposed school field would extend a few ft. east of the existing development footprint (0.09 acres); the majority of the slope separating the campus and park would remain in its current condition (Exhibit 2).

The surface parking lot is proposed on the western portion of the site, and vehicular access to the site would be provided from 25th and 26th Streets. Pick up and drop off would occur on the public street adjacent to the school site (25th Street and Myrtle Avenue). The project would pull in the curb and sidewalk to create a 180 ft. long loading zone on 25th Street to allow vehicles to load and unload passengers out of the main through traffic. The project does not propose to widen the street at the 165 ft. long Myrtle Avenue loading location at this time. Instead, the drop off area will use the existing Myrtle Avenue street-parking area (Exhibit 2). Pedestrian access to the school would be from four access points: 25th Street with direct access from the proposed passenger loading area on 25th Street, 26th Street at the eastern perimeter of the parking lot with direct access from the proposed passenger loading area on Myrtle Avenue, 26th Street at the intersection of Morningside Drive, and end of the cul-de-sac on 26th Street in the southeast portion of the campus. Also proposed is the removal of 12 ornamental trees, relocation of one large palm tree (Exhibit 3), and planting of 45 new trees (Exhibit 5). A six ft. high ornamental steel fence is proposed around the perimeter of the site.

As proposed, the school would have a maximum enrollment capacity of 510 students. However, the district projects actual enrollment at the school to be between 300 and 400 students, with approximately 41 teachers and other staff members.

Construction staging would primarily be in the eastern portion of the project site, with direct access from the driveway at 26th Street and Morningside Drive. A construction work site traffic control plan will be prepared, for approval by the City Public Works Department, which will identify haul routes, construction hours, protective devices, warning signs, parking/staging areas, and access points to the property.

Construction of the proposed project is estimated to be completed over approximately 16 months, with potential occupancy of the school occurring in winter 2020.

Site History:

- The existing permanent buildings on the site were constructed between 1924 and 1958 and were a part of the former North School Campus, which closed in 1984 due to declining enrollment.
- As recently as February 2017, the site was leased to an adult school offering parent education classes and a daycare for children up to 12 years of age. The hours of the adult school were primarily between 8 AM and 1 PM, Monday through Friday, and there were approximately 130 students and staff. The hours of the daycare were from 7 AM to 6 PM, Monday through Friday, and there were approximately 246 students and staff.
- Currently, the structures on the site are vacant.

The City of Hermosa Beach has a certified Land Use Plan (LUP), which is used as guidance; however, the City has not yet completed, nor has the Commission reviewed, any implementing ordinances. Thus, the City's LCP is not fully certified, and the standard of review for the proposed development is the Chapter 3 policies of the Coastal Act.

B. WATER QUALITY

Section 30231 of the Coastal Act states:

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

The applicant is proposing to demolish the existing North School campus and construct a new campus within the approximately 2.35-acre project area. The expansion will result in a decrease in the amount of impervious surface area from 84,934 sq. ft. to 66,695 sq. ft. The project also includes approximately 10,000 cu. yd. of grading. As proposed, the increase in pervious surfaces would reduce stormwater runoff. Nevertheless, the proposed grading could increase the amount of discharge and runoff from the site, and thus, has the potential to adversely impact coastal waters.

The Coastal Act mandates the protection of coastal water quality, and the applicant has submitted a storm water plan, which proposes numerous Best Management Practices (BMPs) to ensure such protection is achieved. Some of these BMPs include new bio-retention swales and planter boxes to control and reduce stormwater flows and storm drain inlets around the site. However the storm water plan has been reviewed by the Coastal Commission's technical staff, who found that some of the information was not yet included in the report, but was intended to be filled in at a later date and that it did not fully cover water quality protection during the construction phase of the project.

To reconcile these deficiencies, staff is recommending Special Conditions 3 and 4, which require the applicant to submit a Construction and Pollution Prevention Plan and a Post-Development Runoff Plan. The incorporation of these requirements will ensure that runoff is controlled, erosion and sedimentation avoided, and the biological productivity and the quality of coastal waters maintained. Thus, as conditioned, the project can be found consistent with Section 30231 of the Coastal Act as well as the City of Solana Beach's LUP.

C. BIOLOGICAL RESOURCES

Section 30240 of the Coastal Act states:

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

Appendix M of the certified LUP contains the following policy related to landscaping:

> *Landscaping*
>
> *Hermosa Beach, like most coastal communities, did not have a large amount of native landscaping. Dune grasses and shrubs have long been replaced by structures and imported vegetation. Although by some standards Hermosa Beach does not have a great amount of landscaping, the use of landscaping within certain residential neighborhoods is very significant. Landscaping within Areas l and 2 of the Coastal Zone is used exclusively for ornamentation providing a softening impact with the buildings so as not to interfere with the view. East of Loma Drive and throughout the valley portion of Area 3, trees provide both shading and a subdued neighborhood atmosphere. Continuing to maintain a sufficient amount of this "natura1" landscaping within the Coastal Zone will be necessary to soften the visual impacts of new development as well as continue to add to the existing character of the neighborhoods.*

Aside from the proposed 0.09-acre encroachment onto the slope separating the existing school site and the park, the campus is a previously developed site. A biological technical report submitted by the applicant found that the project site does not have any environmentally sensitive habitat areas and no native or sensitive plant communities (Ref: Biological Letter Report, Hermosa North Elementary School, Greg Mason, Alden Environmental Inc., February 10, 2017). An opponent of the proposed project asserted that the sandy slope was home to the California Legless Lizard. However, the commenter did not provide any evidence to support this assertion. The California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDB) identifies that the California Legless Lizard as a CDFW Species of Special Concern (SSC). As defined by CDFW, a species is identified as a SSC due to declining population levels, limited ranges, and/or continuing threats have made them vulnerable to extinction. Typically, California Legless Lizards are found in dune habitat adjacent to the ocean. On the subject site, the sandy slope is surrounded by development on all sides and the vegetation on the slope itself appears to be entirely non-native. The Commission's senior biologist has reviewed the proposed project and has determined that sandy slope that separates the existing school site and the park is not viable California Legless Lizard habitat (Exhibit 8).

Although the project would remove 12 trees from the project site, none of these trees are listed as native, candidate, sensitive or special status species. However, removal of the existing, mature trees during nesting season does have the potential to adversely impact nesting birds. Thus, consistent with a requirement placed on the project by the EIR prepared by the school district for the project, Special Condition 5 requires that the applicant retain a qualified biologist to survey for active bird nests prior to construction, demolition, or tree removal that is to occur during the nesting season. If active nests, of a special-status species or species protected by the federal Migratory Bird Treaty Act (MBTA) or the California Fish and Game Code are observed, then a qualified biologist shall monitor the nest daily until project activities are no longer occurring within a distance of the nest appropriate to the sensitivity of the species, and determined in consultation with the California Department of Fish and Wildlife (typically 300 ft. for most species, up to 500 ft. for raptors), or until the young have fledged and are independent of the adults or the nest is otherwise abandoned.

The applicant is also proposing to plant 45 trees throughout the campus, consistent with the LUP landscaping policy cited above. Special Condition 2 requires final landscape plans that use drought-tolerant, native or non-invasive species in order to reduce water use, potential runoff from the site from irrigation, and the spread of invasive species.

The project is not located in ESHA and has been conditioned to ensure that the project will avoid direct impacts to ESHA. Furthermore, the proposed project will not result a reduction to the recreation area of the adjacent public park. Therefore, as condition, the project conforms to Section 30240 of the Coastal Act and the certified LUP.

D. PUBLIC ACCESS & RECREATION

Pertinent Public Access policies of Chapter 3 of the Coastal Act are as follows:

Coastal Act Section 30210 states:

> *In carrying out the requirement of Section 4 of Article X of the California Constitution, maximum access, which shall be conspicuously posted, and recreational opportunities shall be provided for all the people consistent with public safety needs and the need to protect public rights, rights of private property owners, and natural resource areas from overuse.*

Section 30212.5 states:

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

Section 30252 of the Coastal Act states in part:

> *The location and amount of new development should maintain and enhance public access to the coast by (1) facilitating the provision or extension of transit service, (2) providing commercial facilities within or adjoining residential development or in other areas that will minimize the*

use of coastal access roads, (3) providing nonautomobile circulation within the development, (4) providing adequate parking facilities…

The City of Hermosa Beach's certified LUP also contains relevant background and policy language:

Section III. Parking Access Summary, Subsection A states:

Statement of Philosophy

To Preserve and increase, where feasible, residential, commercial, and general public parking within the Coastal Zone.

Section III. Parking Access Summary, Subsection C.1. states, in part:

Policy: That the City should not allow the elimination of existing on-street parking or off-street parking spaces within the coastal zone. Future residential and commercial construction should provide the actual parking necessary to meet the demand generated.

The proposed project has the potential to impact coastal access through increased traffic circulation and parking demand associated with the proposed school. The public access and recreation policies of the Coastal Act and the City's certified LUP broadly protect public access for all by protecting and providing for access to the coast. Section 30210 requires that maximum access and recreational opportunities are provided, Section 30212.5 requires that public facilities be distributed throughout an area to mitigate against adverse impacts to the public, and Section 30252 requires that new development does not adversely impact public access to the coast. The City's LUP requires that public parking in the coastal zone be preserved and increased, where feasible.

The applicant analyzed various alternatives in the project EIR to determine whether impacts to transportation/traffic could be avoided or reduced, while still meeting the project objectives.

The first alternative considered was modernization of the existing North School Facilities and construction of a new cafeteria and library (EIR Section 7.3.2.1). The District determined that this alternative would not reduce impacts to traffic and would not meet the project objectives. In addition, the project would not reduce the project's impacts on existing public street parking. Furthermore, the project would result in less playground space and would result in the need to close a portion of the adjacent public park during school hours in order to safely use the park for the student's physical education needs.

The second alternative considered demolition of the existing North School campus facilities, construction of two alternative layouts for the new campus that were entirely within the existing development footprint, and use of the adjacent park in place of a new turf play area. The primary difference between the two layouts considered, is that Alternative 2a included two onsite loading areas, one in a western parking lot and another along 26th Street; while alternative 2b includes the construction of two parking areas with a loading area east of Morningside Drive on City-Owned parkland (EIR Section 7.3.2.2) (Exhibit 4). Both layouts would utilize a portion of the adjacent public park for the student's physical education needs. Both layouts would include onsite pick up/drop off areas, which would reduce the projects impacts on existing public street parking. The

District determined that this alternative would not reduce impacts to traffic and would not meet the project objectives. These two layouts would result in less playground space and would result in the need to close a portion of the adjacent public park during school hours in order to safely use the park for the student's physical education needs. Furthermore, Alternative 2b would require City approval and possibly a vote of the electorate to construct a second parking lot on a portion of the public park adjacent to the northeast portion of the school site.

The third alternative considered by the District was four alternate locations to site the new school campus instead of constructing it at the proposed project site (EIR Section 7.3.2.3) (Exhibit 4). The District determined that the four identified alternate locations were infeasible for various reasons. The first three locations (Alternatives 3a-3c) were too small to accommodate the objective to construct a school site for 510 students. The fourth location, the existing Hermosa Community Center (Alternative 3d), is a designated historic property and would likely be costly to bring into compliance and would also necessitate that the City find an alternative location for the community activities that currently occur at the Community Center (two theaters, the historical society museum, a senior activity center, and Emergency Operations Center). Furthermore, in order to fund the purchase of any of the alternative sites, the District would need to sell the North School site. The District determined that various site constraints on the North School property would result in a relatively low sales price that would not be adequate to purchase a new property.

The fourth alternative considered was to sell only a portion of the North School Site and purchase one of the four sites identified in Alternative 3 (EIR Section 7.3.2.4). This alternative was deemed infeasible because the sale price would be insufficient to purchase a new site and none of the identified sites meet the project objectives.

The fifth alternative considered demolition of the existing North School campus facilities, construction of one of the new classroom structures on the slope separating the existing school site and the adjacent public park, and construction of a parking lot on a portion of the public park adjacent to the northeast portion of the school site (EIR Section 7.3.3.1) (Exhibit 4). This alternative would include onsite pick up/drop off areas, which would reduce the projects impacts on existing public street parking. However, the District determined that this alternative would not reduce impacts to traffic. Furthermore, the alternative would require City approval and possibly a vote of the electorate to construct parking lot and classroom building on a portion of the public park. This alternative was previously brought before the City electorate and failed to pass. The District undertook a subsequent poll and determined that voters were unlikely to support a project that replaced any of the existing park or slope area with development other than open space (i.e. a classroom building or parking lot).

The sixth alternative was to construct an underground parking area below the school's hardcourt area (EIR Section 7.3.4.1) (Exhibit 4). The District determined that this alternative would not reduce impacts to traffic and would not meet the project objectives. Specifically, the underground parking alternative would not maximize use of limited District funds. The estimated cost of the alternative in 2017 dollars was approximately $34 million, nearly 58% of the total funds available for construction of the North School site and revitalization/modernization of the District's two

current schools. For comparison, the proposed project has an estimated cost of $28.8 million[1]. Furthermore, the alternative has the potential to decrease safety and security for students because the school's play areas would be partially obscured from the rest of the school site by residential development.

The seventh alternative is similar to the proposed project (EIR Section 7.3.4.2). The primary difference between this alternative and the proposed project is that the turf playfield would extend further onto the eastern slope between the school site and the park (Exhibit 4). The parking and pick up/drop off configuration would be the same as proposed and therefore this alternative would not reduce impacts to traffic. In addition, the alternative would not reduce the project's impacts on existing public street parking. The alternative also included construction of a larger retaining wall to support the increased slope encroachment, which would also significantly increase the project cost.

The eighth alternative considered by the District was to demolish the existing campus and to use it for a transitional kindergarten, kindergarten, and first grade students (EIR Section 7.3.5.1). Under this alternative, the applicant analyzed the construction of the same number of classrooms as the proposed project. However, the maximum number of students allowed per classroom for the younger children would be 24 as opposed to a maximum of 30 third and fourth graders allowed per classroom. The smaller class size would reduce the operating capacity of the school. The District determined that this alternative would meet the project objectives. However, the District eliminated this alternative because of community objections based on the belief that younger children are less likely to walk and bike to school and therefore the project would result in increased traffic and increased need for pick up/drop off zones.

The ninth alternative included two options to reconfigure the proposed parking lot to allow for onsite drop off/pick up (EIR Section 7.3.5.2) (Exhibit 4). However, both options would reduce the number of onsite parking spaces below the recommended minimum space requirement for the proposed number of students. Furthermore, the alternate layouts might cause additional traffic impacts through queuing onto the adjacent public street.

The tenth alternative included a one-way southbound driveway to provide onsite pick up/drop off that would extend from the intersection of Morningside Drive and 26th Street to the either 25th Street or Morningside Drive (EIR Section 7.3.5.3) (Exhibit 4). Additionally, the parking lot would be moved to the east side of the project site. This alternative would shift the traffic impacts of the project to the streets north of the project site. Specifically, queuing at the intersection at Gould Avenue/Ardmore Avenue, which is currently operating at a poor level of service, would be worsened. Furthermore, Alternative 10a, which includes a driveway from 26th Street /Morningside Drive to Morningside drive, would result in the need to import a substantial quantity of soil to build up the eastern portion of the project site to make it level with the remainder of the site. Alternative 10b, which includes a driveway from 26th Street /Morningside Drive to 25th Street and construction of a multi-purpose structure south of one of the two possible parking areas, would provide 55 parking spaces. However, the alternative would result in a significant decrease in available

[1] The funding for the new school is a 2016 bond, measure S, that was passed by the city electorate. The funding allocation of the total sum of $59 million includes $28.8 million in bond proceeds to rebuild North School with 17 classrooms, $11.1 million for improvements to Hermosa Valley, and $18.5 million for Hermosa View.

playground area for the students. Alternative 10c is similar to 10b, but the multi-purpose building would be constructed adjacent to the 26th Street. This alternative would reduce the number of onsite parking spaces below the recommended minimum space requirement for the proposed number of students. In addition, the District determined these three alternatives were not feasible, in part, because the alternatives have the potential to decrease safety and security for students because the school's play areas would be partially obscured from the rest of the school site by residential development and none of the options would reduce impacts to traffic.

The eleventh alternative considered two similar options to construct the primary classroom/administration building on the slope between the existing school site and the park and to build a new access road along the southern perimeter of the park. The primarily difference between the two options is that Option A would locate the parking area at the northeast portion of the site and Option B would locate the parking area at the western portion of the site (Exhibit 4). This alternative would alleviate the public parking impacts, as pick up/drop off would be facilitated on the new access road. Additionally, traffic impacts on residential streets would be less than for the proposed project. However, the District determined that this alternative was infeasible because it would require a vote of the electorate to construct the access road within the public park and the previous polling by the applicant indicated that voters were unlikely to support a project that replaced any of the existing park or slope area with development. Furthermore, the eastern half of the new access road would be on City parkland, and it is uncertain whether the City would approve of such a development. In addition, the District determined that the alternative has the potential to decrease safety and security for students because the school's play areas would be partially obscured from the rest of the school site by residential development and construction of the new access road would significantly increase the project cost.

The District also analyzed a No Project alternative and a No Project alternative that would reallocate the bond funding to construct new classroom buildings atop disturbed areas at the existing Valley and View School sites. The No Project alternative would be 'environmentally superior' to the proposed project. Notably, the No Project alternative would avoid the significant traffic impacts that are expected to result with the proposed project. However, the No Project alternative would not meet nine out of the ten project objectives. The No Project alternative that would reallocate the bond funding to construct new classroom buildings at the existing Valley and View School sites would also be 'environmentally superior' to the proposed project. This alternative would also eliminate the significant traffic impacts that are expected to result with the proposed project. However, similar to the first No Project alternative, this alternative would not relieve the existing overcrowding at the View and Valley Schools, it would not maximize use of District funds, and it would not maximize use of District-owned property.

The Commission has analyzed the numerous alternatives presented by the applicant and, as explained below, finds that the proposed project, as conditioned in this staff report, is the most protective of coastal resources, while also meeting project objectives.

Circulation

There is public opposition to the proposed project, which is primarily focused on concerns that the project will result in adverse impacts to circulation and traffic in the immediate vicinity of the school site. The roads directly adjacent to the North School site are all two-lane local streets. Pacific

Coast Highway and Artesia Boulevard, which are classified as regional roadways, are located approximately ½ mile inland of the site.

Due to the narrow street widths surrounding the project site, vehicular circulation to and from the school site would be constrained at the beginning and ending of each school day. The narrow streets would be an inconvenience for motorists and surrounding residences and would result in reduced vehicle speeds. However, the applicant's traffic consultants determined that there are sufficient pull-out opportunities for vehicles traveling in opposite directions to pass when one of the drivers pulls over to an open curb (where no vehicles are parked) or a driveway to allow oncoming vehicles to pass.

The EIR prepared for this project includes a traffic study that estimated the total number of additional trips that would be generated by the project under a maximum capacity scenario with 510 students compared to the number of trips generated with the most recent use of the site (day care and adult school). The additional trips represent the total number of vehicle trips generated by the site, including staff/faculty vehicles, drop-off/pick-up activities, visitors, and deliveries. The traffic study found that the proposed project would potentially result in an additional 217 daily weekday morning peak hour vehicle trips per day, 24 additional trips during the weekday afternoon peak hour, and 100 additional weekday trips throughout the remainder of the day. The traffic study concluded that during the weekday morning and afternoon peak hour, none of the study area intersections or street segments would be significantly impacted by the proposed school project.

Standard practice for traffic studies is to look at circulation impacts over one-hour periods. However, in response to concerns raised by the City and nearby property owners, the applicant also undertook a traffic study that analyzed the morning and afternoon peak half hour time periods. The peak half hour analysis more closely models the short bursts of more intense traffic flow during the period immediately prior to the beginning of the school day and immediately after the school day ends. The half hour analysis found that the proposed project would result in potentially significant impacts to two of the 17 study intersections (Valley Drive/Gould Avenue and Ardmore Avenue/Gould Avenue) and potential significant impacts to six street segments near the school (24th Street, Morningside Drive, Park Avenue, 25th Street, 26th Street, and Myrtle Avenue). The traffic delays would occur during the half-hour period at the beginning of the school day and during the half-hour period at school dismissal. In order to help mitigate the expected impacts to circulation, the applicant and the City have agreed to a Memorandum of Understanding that includes the establishment of a working group to create a Neighborhood Traffic Management Plan prior to opening the school. The working group will also continue to evaluate conditions around the site after the school opens to further explore options to reduce congestion. Future mitigation options may include, but are not limited to, a staggered bell schedule, additional red curb areas, and additional offsite loading areas. These potential mitigation measures will primarily affect areas within the City right-of-way and may require that the City obtain a CDP from the Commission. In addition, the District has indicated that they may use the new North School campus as a transitional school; while the District's other two Hermosa Beach schools are renovated. The use of the North School as a transitional school may temporarily result in the need to add parking restrictions to additional on-street parking spaces above the number of spaces approved to be impacted by the proposed project, which may also result in the need for the City to obtain a CDP from the Commission.

As shown in the traffic study, the proposed project is likely to create worsened traffic conditions for short periods of time for nearby residents and drivers who pass near the school site directly before and after the school day. However, the primary traffic impacts will occur on weekdays in the early morning and early afternoons primarily outside the summer months. Furthermore, Gould Avenue, the primary east/west street that may be impacted by the project, is only one of many east/west streets that beach users can take to access the City's beaches from Pacific Coast Highway. Thus, the expected circulation impacts resulting from the new school campus are unlikely to adversely impact beachgoers and beach access during prime beach usage times (i.e. midday on weekends during the summer months) and there are alternate routes that beach users can use to get to the beach if their visit happens to coincide with the start or end of the school day.

On-Street Public Parking

The City of Hermosa Beach has historically experienced a shortage of parking due to competing parking demands of beach-goers, customers of commercial establishments, and the surrounding residential uses which range from low to high density. In order to alleviate those parking demands, the City proposed, and the Commission approved, a parking management plan, which has been in place for nearly 40 years. The parking management program has been revised various times since its original approval in 1982 (Ref: CDP Nos. 5-82-251, 5-82-251-A1, 5-84-236, 5-84-236-A1, 5-84-236-A2, 5-97-011). The residential parking program covers nearly the entirety of the City's Coastal Zone (an area bounded by both City boundaries on the north and south, the Strand (ocean front) on the west and Loma and Morningside Drives on the east) and provides for preferential parking by permit for residents who live within four blocks of the beach. In general, the parking program as approved most recently by the Commission, consists of preferential on-street parking for City residents between May 15 and September 15 from 10:00 AM to 10:00 PM every year, a maximum of 1 hour parking in preferential spaces for non-residents, and provision of free remote parking lots for visitor beach parking[2].

All of the existing public on-street parking spaces adjacent to the project site are included in the City's parking management program and are currently restricted to a maximum of one hour without a resident or day-use pass between May 15 and September 15 each year. Currently, there are 35 public on-street parking spaces adjacent to the project site. As proposed, the school reconstruction will result in one additional on-street public parking space through changes to the entry and exit access driveways points. However, all 36 of the post project public parking spaces are proposed to be restricted to allow for safe drop off/pick up during school days. Specifically, on school days between 8:00 AM and 9:00 AM and between 2:30 PM and 3:30 PM, parking will be prohibited in 19 of the parking spaces adjacent to the site in order to increase safety for students and only loading will be allowed in the 17 identified pick up/drop off parking spaces[3] (Exhibit 6).

[2] The Commission had initially required that a free or low-cost shuttle be provided to take visitors from the remote parking lots to the beach (Ref: CDP No. 5-82-251 and 5-84-236). However, the Commission subsequently approved an amendment to the parking program to eliminate the shuttle requirement after the City provided data showing low ridership numbers on the shuttle (Ref: CDP 5-82-251-A1).

[3] The proposed drop off/pick up loading zones are consistent with the "Traffic Operations and Safety at School: Recommend Guidelines" (Cooner et al. 2004), which recommend that schools have one loading space for every 50 students, with a minimum of five spaces. Thus, with a maximum enrollment of 510 students, the school would need a minimum 11 pick up/drop off loading spaces (510 students / 50 = 11

Although the drop off/pick up parking restrictions will primarily occur outside the prime summer beach use season, the restrictions have the potential to adversely impact the existing on-street public parking spaces, which are within an easy walk of the beach and are available with limited restrictions eight months out of the year (September 16 through May 14). Specifically, in order to use one of the 36 on-street parking spaces that would be available to the public, a beach user would have to leave before 8:00 AM or arrive after 9:30 AM for a morning beach walk or surf session and someone who wants to spend the afternoon at the beach would need to either leave before 2:30 PM or arrive after 3:30 PM. It may also be the case that local residents who currently use these spaces during the summer months will instead use the spaces in the free remote lots that are intended for beach visitors in order to avoid moving their vehicles twice a day. The remote parking spaces closest to the project site, and therefore most likely to be impacted by the parking restrictions resulting from the North School, are the 35 spaces required to be available for public use at the Kiwanis Club parking lot, which is located approximately 700 ft. from the project site at the east end of the adjacent public park (Exhibit 1).

While not directly related to the proposed school reconstruction project, the Commission's most recent action on the City's parking program (Ref: CDP No. 5-84-236-A2) included approval of the City's proposal that the cost of a non-resident day use parking pass be a maximum of $5 and requires that the City report any change to the parking program to the Executive Director of the Commission in order to determine whether a CDP amendment must be obtained. Changes that must be reported include the location of the remote parking spaces, the duration of the free parking, and the amounts of fees for on-street parking or day passes, or any other feature of the program. It appears that the City is not in compliance with the Special Conditions of CDP No. 5-84-236-A2, on at least two aspects of the parking program. First, street signage adjacent to the project site states that the street parking spaces are restricted to a maximum of 1 hour for non-residents between May 15 and September 15 from 10:00 AM to Midnight, rather than the approved hours of 10:00 AM to 10:00 PM. Second, as of June 2019, the City's website states that a day-use pass can be purchased by a non-resident for a cost of $13 per day, which is significantly more than the $5 fee for day use passes approved by the Commission. Commission staff has notified the City of the inconsistencies between the parking program as approved most recently by the Commission and the current parking program implementation. However, the applicant in this CDP application is not responsible for implementing the parking management plan approved by CDP No. 5-84-236-A2.

Off-street Parking

The site currently has a 44-space parking lot that is not open to the public. As proposed, the existing on-site parking will be replaced with a 41-space parking area. The City's certified LUP does not include parking standards for schools. However, the number of parking spaces within the proposed on-site parking lot is consistent with California Department of Education guidance that schools have at least 2.25 parking spaces per classroom/teaching station. The proposed school will have 17 classrooms and a learning center/library (18 teaching stations * 2.25 = 41 Parking Spaces). While the proposed school would have adequate on-site parking during a normal day, the project EIR

loading spaces). As proposed, the 25th street drop off location is 180 ft. long and the Myrtle Avenue drop off location is 165 ft. Assuming an average car length of 20 ft., the combined 345 ft. loading zone would facilitate 17 cars (345 ft. / 20 ft. = 17.25 loading spaces).

indicates that there would be several special events throughout the year—back-to-school night, performances, etc.—when the demand for parking would exceed the number of spaces in the parking lot and most of the event attendees would have to find parking on the nearby streets or in parking lots in the vicinity of the school. Parking associated with these special events has the potential to make beach parking even more difficult to find during these events. However, the EIR indicates that these parking situations would be temporary—roughly a few hours—and would only occur approximately four to six times annually.

In order to mitigate the impacts to public beach access parking resulting from the twice daily drop off/pick up parking restrictions and from the approximately four to six special events each year, the applicant has proposed to allow public parking in the on-site parking lot as follows: "*No Parking During School Hours from 7AM-6PM*" and "*3-Hr Parking Max after school hours, weekends, and holidays*." The availability of 41 parking spaces for public use, especially during weekends, holidays, and all week in the summer will be a significant beach access resource. However, the three-hour parking time limit during non-school days would be unduly restrictive to beach users who want to spend more than three hours at the beach. Furthermore, future changes in the school programming (i.e. offering summer school, camps, etc.) has the potential to reduce the availability of the on-site parking area to the public and may no longer provide adequate mitigation for the adverse street parking impacts caused by the project.

Therefore, Special Condition 6 has been included to require that the parking lot be available to the public on all weekends, school holidays, and during the summer season between the last and first day of the regular school calendar each year. Furthermore, Special Condition 6 requires that the public be allowed to park in the lot all hours except between 2:00 AM and 4:00 AM on weekends, school holidays, and during the summer season with no maximum stay. A prohibition on parking between 2:00 AM and 4:00 AM will help to ensure that the parking spaces turn over at least once each non-school day and will potentially provide for greater availability to beach users. In addition, the condition incorporates the portion of the applicant's proposal that would provide parking from 6 PM to 7 AM on School days for a maximum of three hours. Rental or leasing of the any of the 41 parking spaces at any time is prohibited. Special Condition 6 also requires that the City submit a signage plan for review and written approval by the Executive Director of the Commission to ensure that the public is made aware of the available parking and hours/days it is available to the public. Lastly, the parking condition requires that, prior to making changes to school programming that would result in a reduction in the number of days that the parking lot is available to the public, the applicant must contact the Executive Director to determine whether an amendment to this Coastal Development Permit will be required.

As conditioned, the proposed development would minimize adverse impacts to public access and recreation, and thus, it is consistent with Section 30210, 30212.5, and 30252 of the Coastal Act and with the City of Hermosa Beach certified LUP.

E. COMMUNITY CHARACTER AND VISUAL RESOURCES

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

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

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

VI. Coastal Development and Design, Subsection B:

B. *Goals and Objectives*

1. *To develop a stable population which is suited to the available land area and community resources.*
2. *To preserve and enhance coastal overviews and key view point areas.*
3. *To encourage historic preservation to maintain the eclectic character of Hermosa's mixed architectural styles.*
4. *To continue to develop facilities that serve the needs of both coastal visitors and the City's residents.*
5. *To preserve and, where feasible, enhance the City's remaining open space.*

VI. Coastal Development and Design, Subsection C.1:

1. *Existing Policies & Program*

Policy: That the City should restrict building height to protect overview and viewshed qualities and to preserve the City's existing low-rise profile.

Program: Zoning and building codes limit the height of all structures, depending on zone. The maximum height in each residential R-1, R-2, and R-3 zones are 25 ft., 30ft., and 35 ft. respectively. The maximum height in the City is 45 ft. or three stories and is in the commercial zone. (See Appendix G, .Table XIII.)

Appendix M of the certified LUP states, in part, the following:

Building Height/Scale

The scale of the City is subdued and reflective of the natural contours of the beach and dune areas. The City, at present, does not contain any 1arge obtrusive structures. Bui1ding height for all areas are controlled by zoning height limitations. Present height restrictions is the basic view preservation mechanism utilized by the City. The maximum building height allowable in

the City is 3 stories or 45 feet, for commercial property and 35 feet for residential property (see Table XXV).

Building Architect

Through the City's development before the turn of the century, various bui1ding designs and styles have been constructed. Many were bui1t to take advantage of the westward view of the ocean or open expanse of sky. The expanse of windows · in most structures adds to the internal design aspects for the residence. Porches and decks are predominant throughout the City and provide additional areas for viewing and sunning.

Consistency of building design has, until recently, never occurred to a great extent in the City. The first wood cottages established over 80 years ago have for the most part been replaced by newer structures or been remodeled and refurbished. Intermittent new construction and individual redevelopment of structures has resulted in a potpourri of building designs that give a unique, individual character to each street in the City. The blandness that is so characteristic of many subdivisions is not prevalent in the City.

The project site is located adjacent to a public park and is surrounded by single and multi-family residential buildings located less than ¼-mile from the beach. The existing campus consists of five buildings that will all be demolished, and the proposed project includes the construction of two new, two-story buildings. The new buildings will consist of a 31,469 sq. ft., 30 ft. high two-story classroom and administration building (main building), a 5,507 sq. ft. and a 26 ft. 10 in. high two-story multipurpose building. The District is not required to comply with City zoning requirements related to height. Nevertheless, the two buildings have been designed to comply with the height restrictions applicable to adjacent R-2 zoned homes.

The Coastal Act and the certified LUP require that the visual quality of the area is protected by siting and designing development to preserve views to and along the ocean and scenic coastal areas. It also requires that development is visually compatible with the character of the surrounding area. As described by the applicant, the new school structures have been designed in a modern coastal architecture style (Exhibit 9), similar to the surrounding newly renovated residences.

Though the subject site is relatively close to the coast, there are no public coastal views across the subject site. There is an existing view of the ocean from 25th Street adjacent to the southwest corner of the site that will not be affected by the proposed project (Exhibit 7). Although the project would locate an elementary school in a residential neighborhood, this is not uncommon as public elementary schools usually serve their local communities and doing so facilitates walking and biking to school as opposed to driving, thereby reducing vehicle miles travelled, traffic and congestion, and related impacts to coastal resources (see, e.g. Sections 30253(d) and 30250 of the Coastal Act). In addition, the proposed two-story buildings are consistent with the scale of residential development in the surrounding area, which includes many two-story buildings.

Therefore, the proposed project would not have any adverse impacts to public views or community character. Special Condition 1 requires the applicant to submit final plans consistent with the proposed plans to ensure that visual resources are protected. Thus, as conditioned, the Commission

finds that the project conforms to Section 30251 of the Coastal Act and the visual protection and community character policies of the certified LUP.

F. CULTURAL RESOURCES

Section 30244 of the Coastal Act states:

Where development would adversely impact archaeological or paleontological resources as identified by the State Historic Preservation Officer, reasonable mitigation measures shall be required.

The vast majority of the proposed site has been disturbed in the past with the development of the existing school campus. A cultural resources records search through the California Historic Resources Information System (CHRIS), South Central Coastal Information Center (SCCIC) at California State University, Fullerton, and a Sacred Lands Search through the Native American Heritage Commission (NAHC) in Sacramento was conducted as part of the EIR for the proposed project. The project EIR concluded that there are no known tribal cultural resources listed or eligible for listing in the California Register of Historical Resources, in a local register of historical resources, or of cultural value to a California Native American tribe on the project site. However, the project EIR concluded that it is possible that construction-related earthwork may inadvertently uncover buried tribal cultural artifacts. To mitigate any potential impacts to tribal resources, the EIR requires that a registered professional archaeologist be onsite during grading activities and that if tribal cultural resources are found, that the archaeologist contact the liaisons for the local tribes.

The project EIR also found that the project site is not a designated archaeological site, nor has it been determined to be a historical resource. However, in an abundance of caution, the applicant determined that ground disturbance near the location of the early 1900s structures that existed prior to the current school buildings could impact archaeological resources that may be buried in site soils. To mitigate any potential impacts to archaeological resources, the EIR requires that the applicant retain a qualified archaeologist to monitor ground-disturbing activities.

The project EIR also found that if older Quaternary terrace deposits are expected to be encountered during project grading, the District must hire a qualified paleontologist to monitor earthwork on the site for discovery of paleontological resources.

The Historical Resource Assessment Report undertaken as a part of the EIR for the proposed project concluded that the existing structures on the North School Site do not qualify as historic properties or resources because they do not "…*meet the criteria for being determined significant resources, individually or collectively, on a statewide or national level…"* (Historic Resources Assessment Report, by Daly & Associates, dated Revised July 2017).

Based on the review of the technical reports, submitted by the applicant as a part of the project EIR, the Commission concurs that the existing structures on the site do not qualify as historic and it is highly unlikely that tribal cultural resources, archaeological resources, or paleontological resources

will be impacted. Furthermore, the mitigation measures presented in the project EIR are sufficient to address any potential impacts. Thus, the Commission finds, therefore, that as conditioned, the proposed project is consistent with Section 30244 of the Coastal Act and the City's certified LUP.

G. LOCAL COASTAL PROGRAM (LCP)

Coastal Act Section 30604(a) states that, prior to certification of a local coastal program ("LCP"), a coastal development permit can only be issued upon a finding that the proposed development is in conformity with Chapter 3 of the Act and that the permitted development will not prejudice the ability of the local government to prepare an LCP that is in conformity with Chapter 3. The Land Use Plan (LUP) for Hermosa Beach was effectively certified on April 21, 1982; however, because Hermosa Beach does not have a certified LCP, the Coastal Act is the standard of review for this project.

As conditioned, the proposed development is consistent with Chapter 3 of the Coastal Act and with the certified Land Use Plan for the area. Approval of the project, as conditioned, will not prejudice the ability of the local government to prepare an LCP that is in conformity with the provisions of Chapter 3 of the Coastal Act.

H. CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)

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

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

The proposed project has been conditioned in order to be found consistent with the Chapter 3 policies of the Coastal Act. Mitigation measures, including special conditions addressing water quality, biological resources, public access policies and recreation, community character and visual resources policies of the Coastal Act, will minimize all adverse impacts to coastal resources. As conditioned, there are no feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse impact which the activity may have on the environment. Therefore, the Commission finds that the proposed project is the least environmentally-damaging feasible alternative and can be found consistent with the requirements of the Coastal Act to conform to CEQA.

Appendix A - Substantive File Documents

- City of Hermosa Beach Certified Land Use Plan
- Ref: CDP Nos. 5-82-251, 5-82-251-A1, 5-84-236, 5-84-236-A1, 5-84-236-A2, 5-97-011
- Biological Letter Report, Hermosa North Elementary School, Greg Mason, Alden Environmental Inc., February 10, 2017
- Final Environmental Impact Report, by Placeworks, dated December 2018
- California Department of Fish and Wildlife, Natural Diversity Database. April 2018. Special Animals List. Periodic publication. 66 pp.
- Biological Letter Report, Hermosa North Elementary School, Greg Mason, Alden Environmental Inc., February 10, 2017
- Project Plans, by SVA Architects, dated June 6, 2018
- Landscape Plan, by Architerra Design Group, dated December 7, 2018

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