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Hearing Date: 1/13/21

STAFF REPORT: CONSENT CALENDAR

Application No.:	**6-20-0435**
Applicant:	**Santa Fe Christian Schools**
Agent:	Keith Francis
Location:	838 Academy Drive, Solana Beach, San Diego County (APN 298-112-29, -30)
Project Description:	Demolition of nine existing one-story classroom, support room, and restroom buildings totaling approximately 11,000 sq. ft.; construction of one new three-story educational building totaling approximately 44,000 sq. ft., underground stormwater treatment facility, utilities, parking spaces, fire access staircase, fire access lanes, landscaping and hardscape on a 16.31 acre site.
Staff Recommendation:	Approval with conditions.

SUMMARY OF STAFF RECOMMENDATION

The proposed project is located on the west side of the Santa Fe Christian Schools campus and involves demolition of existing classroom and administrative buildings and construction of a new educational building, additional parking spaces, fire access lanes and staircase, landscaping, hardscape and water quality improvements.

The project would increase the number of classrooms in the project area from 14 to 20, and thus has the potential to allow for a small increase in student enrollment, which

could, in turn, impact traffic, circulation, and public access to the coast. However, the site is not adjacent to any major coastal accessways, and adequate parking is available to accommodate the proposed number of classrooms. A Supplemental Final Environmental Impact Report was prepared that included a Traffic Impact Study, indicating traffic levels and circulation will remain in acceptable levels, even with an increased student enrollment.

The project also involves the removal of 25 non-native trees and planting of 40 trees. **Special Conditions No. 1** and **No. 2** require the submittal of Final Plans and Final Landscape Plans to ensure the project complies with the approved plans and incorporates drought tolerant native or non-invasive plants.

The proposed project will result in a minor increase in impervious surface. A stormwater treatment and storage facility will be installed to remove pollutants and reduce flow from stormwater. Also proposed is 9,900 cu. yds. of cut and 2,100 cu. yds. of fill, which has the potential to result in adverse impacts to water quality from construction and post-construction activities. To avoid such impacts, **Special Conditions No. 3** and **No. 4** require the applicant to submit a Construction-phase Stormwater Pollution Prevention Plan and a Post-construction Water Quality Technical Report, respectively.

Commission staff recommends that the Commission **APPROVE** coastal development permit application 6-20-0435, as conditioned. The motion is on page 4. The standard of review is Chapter 3 of the Coastal Act.

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EXHIBITS

I. MOTION AND RESOLUTION

Motion:

I move that the Commission **approve** the coastal development permit applications included on the consent calendar in accordance with the staff recommendations.

Staff recommends a **YES** vote. Passage of this motion will result in approval of all the permits included on the consent calendar. The motion passes only by affirmative vote of a majority of Commissioners present.

II. STANDARD CONDITIONS

1. **Notice of Receipt and Acknowledgment**. The permit is not valid and development shall not commence until a copy of the permit, signed by the applicant or authorized agent, acknowledging receipt of the permit and acceptance of the terms and conditions, is returned to the Commission office.

2. **Expiration**. If development has not commenced, the permit will expire two years from the date on which the Commission voted on the application. Development shall be pursued in a diligent manner and completed in a reasonable period of time. Application for extension of the permit must be made prior to the expiration date.

3. **Interpretation**. Any questions of intent of interpretation of any condition will be resolved by the Executive Director or the Commission.

4. **Assignment**. The permit may be assigned to any qualified person, provided assignee files with the Commission an affidavit accepting all terms and conditions of the permit.

5. **Terms and Conditions Run with the Land**. These terms and conditions shall be perpetual, and it is the intention of the Commission and the applicant to bind all future owners and possessors of the subject property to the terms and conditions.

III. SPECIAL CONDITIONS

1. **Revised Final Plans.**

   a. **PRIOR TO THE ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT,** the applicant shall submit for the review and written approval of the Executive Director, revised final plans approved by the City of San Diego that are in substantial conformance with the plans prepared by Safdie Rabines Architects dated 1/23/20 titled “Santa Fe Christian Schools Phase 1B & 1C – Quad + Multipurpose Buildings”, plans dated 8/12/20 titled “Main Entry Stair”, and plans dated 11/3/20 titled “Site Stair”.

b. The permittee shall undertake development in conformance with the approved final plans unless the Commission amends this permit or the Executive Director determines that no amendment is legally required for any proposed minor deviations.

2. Final Landscape Plans.

a. **PRIOR TO THE ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT**, the applicant shall submit to the Executive Director for review and written approval final landscape plans. Said plans shall be in substantial conformance with the landscape plans prepared by Safdie Rabines Architects dated 3/13/20 and 8/12/20, which shall include and be consistent with the following:

i. 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).

ii. 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.

b. 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-phase Stormwater Pollution Prevention Plan.

a. **PRIOR TO THE ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT**, the applicant shall submit, for the written approval of the Executive Director, a final construction-phase Stormwater Pollution Prevention Plan that substantially conforms with the plan submitted to the Commission entitled Stormwater Pollution Prevention Plan for Santa Fe Christian School - Quad, prepared by Kimley-Horn & Associates (dated August 2020). To protect water quality during

construction and demolition activities, the following additional requirements shall be included in this plan:

i. Best Management Practices (BMPs) designed to minimize adverse impacts resulting from construction and demolition activities shall be implemented prior to the onset of such activity, including BMPs to minimize erosion and sedimentation, minimize the discharge of pollutants and non-stormwater runoff, and minimize land disturbance, as applicable. The description and location of all water quality BMPs to be implemented during construction and demolition shall be specified.

ii. The plan shall include a description and schedule of the management of all construction-phase BMPs (including installation and removal, ongoing operation, inspection, maintenance, and any staff training on BMPs).

iii. All BMPs shall be maintained in a functional condition throughout the duration of the construction and demolition activities, and shall be promptly removed when no longer required.

iv. 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 shall be prohibited, to minimize wildlife entanglement and plastic debris pollution. Only products with 100% biodegradable (not photodegradable) natural fiber netting shall be allowed.

4. Post-construction Water Quality Technical Report.

a. **PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT**, the applicant shall submit, for the written approval of the Executive Director, a final post-construction Water Quality Technical Report that substantially conforms with the plan submitted to the Commission entitled City of Solana Beach Priority Development Project (PDP) Water Quality Technical Report (WQTR) for Santa Fe Christian School: Phase 1B and 1C Grading Plan, prepared by Kimley-Horn & Associates (dated September 17, 2020). For long-term protection of coastal water quality after construction is complete, the applicant shall comply with the following additional requirements that shall be included in this plan:

i. The proposed Treatment Control BMP, which is the BioClean Modular Wetlands biofiltration system, shall be sized and designed to infiltrate, retain, or treat, at a minimum, the runoff produced by the 85^{th} percentile 1-hour storm event, multiplied by a safety factor of 2.

The plan shall specify the value and data source for each variable used in the equation for sizing this BMP, including the 85th percentile design storm intensity.

ii. The proposed Hydromodification Management Flow Control BMP, which is the BioClean Urban Pond underground storage vault, shall be sized and designed to prevent the post-project runoff peak flows discharged from the site from exceeding pre-project peak flows for 50% of the 2-year storm event through the 10-year storm event. The plan shall specify the value and data source for each variable in the continuous simulation modeling used to determine the required Design Capture Volume of the BioClean Urban Pond, including the 85th percentile design storm intensity value.

iii. A Treatment Control BMP (or suite of BMPs) shall be selected that has been shown to be effective in reducing the pollutants of concern generated by the proposed land use. Therefore, the plan shall document the expected effectiveness of the proposed Treatment Control BMP, which is the BioClean Modular Wetlands, in removing pollutants of concern from the site's runoff prior to discharging runoff off-site.

iv. The plan shall specify practices that will be used to minimize polluted runoff from vegetated landscape areas. The use of landscaping chemicals (i.e., pesticides, herbicides, and fertilizers) shall be minimized to the extent feasible.

v. The plan shall include a description and schedule of the ongoing management of all post-construction BMPs (including operation, maintenance, inspection, and training) that will be performed as required for the BMPs to function properly, to protect coastal water quality for the life of the development.

IV. FINDINGS AND DECLARATIONS

A. Project Description and Background

Santa Fe Christian Schools (SFC) proposes to demolish nine existing one-story modular classroom, support room, and restroom buildings totaling approximately 11,000 sq. ft.; construct one new three-story, educational building totaling approximately 44,000 sq. ft.; and install an underground stormwater treatment facility, fire access staircase, utilities, parking spaces, fire access lanes, landscaping, and hardscape on the 16.31-acre campus in the City of Solana Beach (Exhibit 1). The proposed project is Phase 1b

of a 5-Phase "Master Plan." The Master Plan involves extensive upgrading and remodeling of the existing campus; however, the current phase, Phase 1b, involves only the aforementioned classroom building and surrounds, stormwater treatment facility, and fire access staircase (Exhibit 3).

The nine existing modular buildings to be demolished total 10,926 sq. ft. and contain 14 classrooms in addition to restrooms, a teacher lounge, and support rooms. The proposed building would total 43,927 sq. ft. and contain 20 classrooms, restrooms, various administrative and support rooms, and a parking garage (Exhibit 4).

This phase of the project will remove 40 parking spaces and install a total of 56 new parking spaces located in the proposed garage and in two new surface parking lots outside of the new building (Exhibit 4). The proposed fire lanes will improve emergency access and traffic circulation through the campus and the new staircase along the southern boundary of the property will provide emergency and pedestrian access from Academy Drive (Exhibit 3). **Special Condition No. 1** requires the submittal of final plans to ensure that they are in conformance with the proposed plans.

Although the number of classrooms will increase from 14 to 20 and could facilitate a small increase in student enrollment, the site is not adjacent to any major coastal accessways, and adequate parking is available to accommodate the proposed number of classrooms. Approximately 1,035 students are currently enrolled at SFC, below the enrollment cap of 1,100 students imposed by the City of Solana Beach. The Traffic Impact Study in the Supplemental Final Environmental Impact Report analyzed traffic levels and circulation with an enrollment of 1,200 students in order to compare results to a 2001 study that analyzed an enrollment of 1,100, and found that traffic levels and circulation will remain at acceptable levels. Thus, even if the proposed increase in classrooms facilitates a future increase in enrollment to 1,200 students, there should be no significant impacts on traffic.

Landscaping and hardscape will be installed throughout the Phase 1b Quad Building area (Exhibit 4). The proposed project will remove 25 non-native trees and plant 40 new trees. **Special Condition No. 2** requires Final Landscape Plans that use drought-tolerant, native, or non-invasive species.

The proposed project will also install an underground stormwater treatment and storage facility to remove pollutants and minimize flow volume from runoff. However, there are potential adverse impacts to water quality from construction and post-construction activities. The applicant is proposing approximately 9,900 cu. yds. of cut and 2,100 cu. yds. of fill, resulting in 7,800 cu. yds. of export. To avoid such impacts, **Special Conditions No. 3 and No. 4** require the applicant to submit a Construction-phase Stormwater Pollution Prevention Plan and a Post-construction Water Quality Technical Report, respectively.

The City of Solana Beach has a certified Land Use Plan (LUP), which is used as guidance; however, the City has not yet completed, nor has the Commission reviewed, any implementing ordinances. Thus, the City's LCP is not fully certified, and the

standard of review for the proposed development is the Chapter 3 policies of the Coastal Act.

B. Biological Resources

Coastal Act policies 30240 and 30251 restrict the alteration of natural landforms and protects sensitive habitats. Section 30231 of the Coastal Act requires that coastal waters are protected and runoff minimized.

The proposed development will not have an adverse impact on any sensitive habitat, and, as conditioned, will not result in erosion or adverse impacts to water quality, as adequate temporary erosion controls (construction BMPs) will be provided. Thus, the project is consistent with the resource protection policies of Chapter 3 of the Coastal Act.

C. Community Character/Visual Quality

The development is located within an existing developed area and, as conditioned, will be compatible with the character and scale of the surrounding area and will not impact public views. Therefore, the Commission finds that the development, as conditioned, conforms to Section 30251 of the Coastal Act.

D. Public Access/Parking

As conditioned, the proposed development will not have an adverse impact on public access to the coast or to nearby recreational facilities. As conditioned, the proposed development conforms to Sections 30210 through 30214, Sections 30220 through 30224, Section 30252 and Section 30604© of the Coastal Act.

E. Local Coastal Planning

The City of Solana Beach has a certified LUP but does not have a certified IP at this time. Thus, the Coastal Commission retains permit jurisdiction and Chapter 3 of the Coastal Act remains the legal standard of review. As conditioned, the proposed development is consistent with Chapter 3 of the Coastal Act. Approval of the project, as conditioned, will not prejudice the ability of the local government to prepare a Local Coastal Program that is in conformity with the provisions of Chapter 3.

F. California Environmental Quality Act

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

- Solana Beach Land Use Plan