

Midcoast Community Council

*An elected Advisory Council to the San Mateo County Board of Supervisors
representing Montara, Moss Beach, El Granada, Princeton, and Miramar*
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Date: January 24, 2024
To: Camille Leung, SMC Planning
From: Midcoast Community Council
Subject: MCC Comments on El Granada School Remodel: PLN2023-00223

Thank you for the opportunity to comment on the remodeling project for the El Granada Elementary school in the Cabrillo Unified School District. The MCC enthusiastically supports this long-overdue improvement to the school facilities in the Midcoast, both in El Granada and at the Farallone View Elementary School in Montara. We thank the current CUSD administration and School Board for advancing these projects, and look forward to their completion and enjoyment thereof by staff and students.

That said, there are aspects of the current plans for the El Granada remodel which are of concern to the surrounding community, and therefore the MCC. While we acknowledge the several benefits of the remodel project, we believe aspects of the effort can be improved to avoid some adverse effects of the current design. The areas of concern for the community and the MCC fall into a handful of categories:

1) View impacts (See Appendix A)

As discussed in Appendix A, the Project is within a Scenic Corridor and the Coastal Zone. Any project in the scenic corridor should therefore demonstrate alignment with San Mateo County Scenic Corridor and California Coastal Act values. The MCC has several concerns in relation to impacts on the scenic views in the area.

The most frequent area of concern voiced by members of the public relates to lighting, including its color, intensity, and duration, and the height of the poles supporting the lighting. Appendix A details our concerns around lighting, including our recommendation that the lighting design be DarkSky International and Wildlife friendly. DarkSky International Board Policy recommends 2200k amber lamps.¹

¹ Item 7a in <https://darksky.org/app/uploads/bsk-pdf-manager/2021/08/BOARD-policy-application-of-light-FINAL-June-24-2021.docx.pdf>

Other view-related concerns include the final proposed height of the remodeled building, for which the plans do not provide sufficient clarity, as well as concerns around the design of any future fencing around the school and the design of the EV charging stations. These concerns are also detailed in Appendix A.

Finally, we note that one potential area of concern was the location of the dumpster; however, it is our understanding that the plan has been revised to place the dumpster essentially where it is today, in which case we do not have a concern with the dumpster.

2) Design aesthetics (See Appendix B)

The MCC and the surrounding community have a few concerns around the design aesthetics of the Project. First, regarding landscaping, we are requesting that all landscaping use native plants that require little to no water. Second, there is concern about the coloration of various building materials in the project, and we request that all materials use tan, buff, taupe, or other natural tones. Finally, we would like clarity about whether the roof will have solar panels, and if so, if the height of said panels is factored into the height estimate of the building. Appendix B details these concerns further.

3) Supporting infrastructure (See Appendix C)

The Midcoast in general suffers from inadequate infrastructure, and the MCC has several concerns in this area, as we want to ensure that the students, teachers, and administrators in the school have the infrastructure they need to create a safe, well-functioning environment for learning. These concerns are detailed in Appendix C.

First, we have concerns about parking, both in terms of capacity and in terms of the traffic impact on the neighborhood. We also have concerns about water & sewer, based on the experience of the Farallone School remodel. The MCC requests that the remodel project plan include a “discovery” inspection task of water and sewer connections to ensure that any decades-old water and sewer infrastructure is identified and accommodations are planned to avoid any ‘surprise’ which would impact project costs, schedule, or the staff and students at the school. Finally, stormwater runoff is a recurring problem on the Midcoast, and we are requesting that CalTrans, SAM, and GCSO be looped in on the Project so they can assess whether the current remodel plan will lead to adverse effects on these agencies’ assets. These concerns are also developed much more in Appendix C.

4) San Mateo County Local Coastal Policies

The land around the school contains species such as herons, owls, hawks, and other sensitive flora and fauna. We require that [San Mateo County Local Coastal Policies](#) - Sensitive Habitats Component - General Policies Section 7.1, 7.2, 7.3, 7.4, 7.5 shall be complied with.

Future Information

Lastly, we are aware that CUSD has scheduled a Community Workshop on the 25th of January. More explanations and/or issues might arise from that session. Given that our last MCC meeting in January is on the 24th, we felt it necessary to make these comments based on then-available information. However, we may revise or supplement these comments based on the discussion and information presented in the Community Workshop.

Conclusion

It must be noted that not all residents agree on all points contained in this letter. A few, for example, do not feel that the current traffic issues are a concern, nor would they be if exacerbated. Others who attend the few night meetings at the school, do want effective illumination in the parking lots. However, this letter represents, on balance, the view of the Council and the community it represents.

Respectfully,

s/ Gus Mattammal, Chair

Appendix A: View Impacts

The Project is within a Scenic Corridor and the Coastal Zone. Any project in the scenic corridor should demonstrate alignment with San Mateo County Scenic Corridor and California Coastal Act values. We are concerned that two aspects of the project will adversely impact views: the Garbage Dumpster and the Lighting.

1. Garbage Dumpster. The location of the Garbage Receptacle has been discussed with CUSD recently, and it appears that it will be returned to a location proximate to the existing building mass and not further obstruct the view corridor. Had it been relocated as proposed, it would have constituted a view blockage and eyesore. As long as it remains within the visual mass of existing/remodeled structures we have no concerns.
2. Lighting. The community has significant concerns that lighting will adversely impact night views for residents and plant and animal species. These concerns have been magnified by the unnecessary and excessive lighting at the El Granada fire station, and the community does not want a repetition of that continued annoyance. Evidence about the value of Dark Skies for both humans and animals is contained in Appendix D.

The lighting spec sheet has checked LZ-3: Moderately High - Urban Areas. That is not accurate, nor required. One might argue that a scenic corridor should be LZ-0 as undeveloped parkland would be a better characterization of the scenic corridor, given the stretch of Hwy 1 from East Miramar to Princeton has minimal artificial light at night. All of East Miramar and more than half of El Granada have no street lights. Lower EG has very sparse street lighting. There are no lights on the Midcoast Hwy 1 eastside, parallel, or multi-modal trail, only bollards at street intersections. In general, the community in the area is against any lighting at all in the parking lot. Bollards on ADA paths need to be reviewed, spaced far apart, but planned for being on only when a person is using the walkway for access to/from school.

As the school has few nighttime events (only 8 after civil twilight according to one source), we state that no ongoing lighting is needed, and should not be on, UNLESS the campus is in active nighttime use. It was pointed out that modern cell phones have flashlights, so the need for parking lot lighting is unsubstantiated. We oppose use of motion detection technology to control lights except as a last resort, as there are numerous examples Midcoast where nighttime animal species repeatedly trigger lights², and even windy nights cause incessant flashing. When and where lighting is required, we insist that it comply with Dark Sky principles (see Appendix D) and not

² Rodents, cats, skunks, owls, deer, coyotes, and mountain lions are in the area.

emit beyond the campus boundary when it is required to be turned on.

3. Building Height. In addition, the height of the building seems to exceed the LCP 28' maximum. While it has not been the focus of community feedback received to date, we are concerned about its impact on views. Most of the diagrams in the planning materials we received (*e.g. 01-120558_DWG_A.pdf*) were overhead views and technical drawings. We have not found a 'street rendering' view of the remodeled campus from nearby vantage points showing the view impact, nor are we aware that 'story poles' have been added to the current structure to inform the community of potential impacts on ocean and scenic corridor views. We request such before/after renderings and representations be made available to the community.

4. Other view impacts: There is concern about future fencing and the EV Charging stations. As charging stations can have some height to them, would EV charging be less obtrusive along the North East section of the parking lot, as it sits below grade of the street? EV charging stations should emit NO light when not in use, and minimal light when in use.

We understand the unfortunate need for security fencing in today's society, but we maintain that chain link fence alternatives, which are less obstructive, can suffice to prevent intrusion.

Appendix B: Design Aesthetics

1. Trees. Aside from some oaks, redwoods and madrone species, trees are not native to this area, and can also obstruct views. Our preference is for no or low trees, within the silhouette of the adjacent building mass. Any trees or shrubs should be native species requiring little to no watering.
2. Coloration. Tan, buff, or taupe tones are preferred to industrial concrete appearance for walkways, walls, and visible foundations. A natural color to blend in with surroundings and not reflect would be more appropriate. Regarding the roof, a white color is too reflective and we believe violates regulations. Another house in the area has such a roof and it glares for miles; we do not want to repeat that mistake.
3. Are solar panels planned for any of these buildings and are they included in the height measurements?

Appendix C: Supporting infrastructure

1. Parking. We have found no diagram for the parking spaces in our document review, but we understand there will be a reduction of 14 parking spaces: 9 general parking places plus 4 dedicated EV spaces and an additional ADA space. Is this adequate to current needs, and supported by code requirements? Please document the requirements & codes that dictated the numbers for EV charging stations and ADA spaces. Some residents have complained that the reduction in parking will adversely impact traffic in the area. Will the proposed drop off zone work as envisioned by architects or back traffic up along Ave. Alhambra? We suggest these parking lot details be disclosed and a study of the traffic impacts performed.

2. Water & Sewer. During the Farallone View school remodel, water had to be shut off because it was discovered that there were inappropriate cross-connections between water and sewer lines, and a lack of backflow prevention. Since then CUSD held a meeting with CCWD, GCSD, an MCC representative to forestall any similar issues with this EG project. The MCC requests that the remodel project plan include a “discovery” inspection task of water and sewer connections to ensure that any decades-old water and sewer infrastructure is identified and accommodations are planned to avoid any ‘surprise’ which would impact project costs, schedule, or the staff and students at the school.

3. Stormwater. We have a longstanding concern that the County’s standards for stormwater runoff and management are inadequate for the current rainfall climate on the Midcoast. As noted in comments submitted to the County regarding other projects³, the County’s Green Infrastructure stormwater standards will only capture 3% of the runoff from a “100 year storm”, which is defined as about 5” of rainfall in 24 hours. That level of storm is exceeded here approximately annually, on average, and retaining such a small fraction of that water puts downhill properties at risk of flooding and damage. We request that Caltrans be consulted to ensure the drainage and culverts available to handle runoff from the project will be sufficient for the stormwater inundation experienced almost annually from 6” to 8” storms on the Midcoast, so that Highway 1 will not be undermined and/or washed out, as Hwy 92 was in the New Year’s Eve storm of 2023. Note that the newly installed Midcoast Hwy 1 eastside, parallel, or multi-modal trail has already been flooded in El Granada in recent storms. We also request that GCSD and SAM be consulted to ensure that their wet weather storage and Intertie Pipeline system will not suffer from increased infiltration and inflow stemming from this project.⁴

³ reference our [comments on the Cypress Point MidPen Housing project](#), pp 31-36, et seq.

⁴ The sewer system experienced a spill in the IPS of between 3 and 4 million gallons in the New Year's Storm of 2023.

Appendix D

Dark Skies Science and Emerging Best Practices

This section presents sources the MCC has identified which explain and justify adherence to DarkSky International concepts. The objective is not only human health, but survival of night species, migratory species, and vegetation.

The lighting principles are summarized as follows:

Five Lighting Principles for Responsible Outdoor Lighting



Responsible outdoor lighting is	1 Useful	Use light only if it is needed All light should have a clear purpose. Consider how the use of light will impact the area, including wildlife and their habitats.	
	2 Targeted	Direct light so it falls only where it is needed Use shielding and careful aiming to target the direction of the light beam so that it points downward and does not spill beyond where it is needed.	
	3 Low Level	Light should be no brighter than necessary Use the lowest light level required. Be mindful of surface conditions, as some surfaces may reflect more light into the night sky than intended.	
	4 Controlled	Use light only when it is needed Use controls such as timers or motion detectors to ensure that light is available when it is needed, dimmed when possible, and turned off when not needed.	
	5 Warm-colored	Use warmer color lights where possible Limit the amount of shorter wavelength (blue-violet) light to the least amount needed.	

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- [Video Presentation](#) to MCC by Dr. Travis Longcore on Ecological Light Pollution - July 12, 2023
- Other presentations by Dr. Travis Longcore on similar topics
 - Recent presentation for Caltrans: <https://youtu.be/9W50NRq-PWM?list=PL2wehjQAfiNFcYBIWQC7xhRplergYijGh>
 - Presentation for Santa Clara Valley Audubon: https://youtu.be/uXEBf28i7_A
 - Light pollution and birds: <https://youtu.be/4jllfcmKhsM?t=825>
 - International Dark Sky Week 2022: <https://youtu.be/eUz4ogibrIY>
- **DarkSky International:** <https://darksky.org/>
- **DarkSky International Board Policy:** <https://darksky.org/app/uploads/bsk-pdf-manager/2021/08/BOARD-policy-application-of-light-FINAL-June-24-2021.docx.pdf>

- **International Dark-Sky Places:**
<https://darksky.org/what-we-do/international-dark-sky-places/all-places/>

Dark Skies Implementations in Other Jurisdictions

Listed below are findings from Web research into the use of Dark Skies-Compliant lighting in public buildings such as schools and fire stations in the U.S. These examples demonstrate that safety, accessibility, and utility can all be maintained while avoiding the harms created by excessive nighttime lighting.

Schools and Fire Stations Embracing the Dark Sky: Examples of Exterior Lighting Remodels

Here are some inspiring examples of school and fire station remodels that prioritize Dark Sky International standards in their exterior lighting design:

Schools:

- **Kent Denver School (Englewood, Colorado):** This school's remodel replaced traditional pole lights with shielded downward-facing fixtures, reducing light trespass and glare. They also implemented motion sensors and timers to further minimize unnecessary light.
- **Okanogan County Child Development Center (Omak, Washington):** This project replaced existing metal halide lights with amber LED fixtures, reducing blue light emissions and minimizing disruption to nocturnal wildlife and human circadian rhythms.
- **Ithaca Waldorf School (Ithaca, New York):** This school's lighting plan utilizes shielded bollard fixtures along pathways and strategically placed wall-mounted lights to illuminate building entrances. Low-wattage lamps and automatic shutoff controls further contribute to light pollution reduction.

Fire Stations:

- **Highlands Ranch Fire Station No. 2 (Highlands Ranch, Colorado):** This station's remodel incorporated fully shielded downward-facing LED fixtures for parking lots and walkways. The lighting is dimmable and controlled by motion sensors, ensuring adequate visibility while minimizing light pollution.
- **Vashon Island Fire District Station 1 (Vashon Island, Washington):** This station's lighting plan features shielded LED fixtures with amber lenses, reducing blue light emissions and protecting the island's dark sky status. Motion sensors and timers further optimize light usage.

- **Ithaca Fire Department Central Station (Ithaca, New York):** This station's remodel involved replacing traditional floodlights with shielded downward-facing LED fixtures. Task lighting for specific areas like equipment bays minimizes unnecessary light spill.

These examples showcase how schools and fire stations can prioritize responsible exterior lighting while ensuring safety and security. By embracing Dark Sky principles, these institutions contribute to preserving the night sky for future generations and to minimizing harmful environmental impacts.