

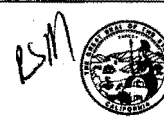
**CALIFORNIA COASTAL COMMISSION**

NORTH COAST AREA

5 FREMONT, SUITE 2000

SAN FRANCISCO, CA 94105-2219

(415) 904-5260

**W 8e**

Filed:	January 22, 1998
49th Day:	March 12, 1998
180th Day:	July 21, 1998
Staff:	Jo Ginsberg
Staff Report:	February 20, 1998
Commission Hearing:	March 11, 1998
Commission Action:	

STAFF REPORT: REGULAR CALENDARAPPLICATION NO.: **1-97-77**APPLICANT: **SETO FAMILY TRUST**

AGENT: Roger Collin

PROJECT LOCATION: 33800 North Albion River Road, Albion Flat, Mendocino County, APN 123-170-01.

PROJECT DESCRIPTION: Authorize a change in use from a mobile home park to an R.V. park for short-term, transient use only, and make various improvements at the Albion River Campground, including installing new electrical and water supply lines to replace and repair existing utilities to the 18 new R.V. spaces; repairing the sewage disposal system; and demolishing ten dilapidated mobile homes.

Lot area:	9.75 acres
LCP designation:	Fishing Village (FV)
Zoning:	FV

LOCAL APPROVALS RECEIVED: Mendocino County LCP Consistency Review;  
Mendocino County Department of Environmental  
Health approval.

SUBSTANTIVE FILE DOCUMENTS: Mendocino County Local Coastal Program; Mendocino County Use Permit #U 84-77; Coastal Permit No. 1-98-004-W (Seto).

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SUMMARY OF STAFF RECOMMENDATION:

The proposed project seeks to authorize a change in use at the Albion River Campground from a mobile home park to a recreational vehicle (R.V.) park. This change of use is a change from a residential, non-priority use to a low-cost visitor serving and recreational facility, a high-priority use under Coastal Act Sections 30213, 30221, and 30222. The staff thus recommends that the Commission approve with conditions the coastal development permit application for the proposed project on the basis that it is consistent with the policies of the Coastal Act.

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STAFF NOTE

Mendocino County has a certified Local Coastal Program, and therefore has coastal permit authority within its coastal zone jurisdiction. However, the proposed project is located within the Commission's area of original jurisdiction, so the project is subject to the Coastal Commission's permit authority, and the Coastal Act is the standard of review.

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STAFF RECOMMENDATION:

I. Motion, Staff Recommendation, and Resolution

Motion:

I move that the Commission approve Coastal Development Permit No. 1-97-77 subject to conditions.

Staff Recommendation of Approval:

Staff recommends a **YES** vote and adoption of the following resolution and findings. The motion passes only by affirmative vote of a majority of the Commissioners present.

Resolution to Approve Permit with Conditions

The Commission hereby grants, subject to the conditions below, a permit for the proposed development on the grounds that the development, as conditioned, will be in conformity with the provisions of Chapter 3 of the California Coastal Act of 1976, will be in conformity with the provisions of the

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Mendocino County Local Coastal Program, is located between the sea and the first public road nearest the shoreline and is in conformance with the public access and public recreation policies of Chapter 3 of the Coastal Act, and will not have any significant adverse impacts on the environment within the meaning of the California Environmental Quality Act.

II. Standard Conditions: See attached.

III. Special Conditions:

1. Conversion from Public Recreation Use:

This coastal development permit authorizes the conversion of a mobile home park to a recreational vehicle park for short-term transient use, with a six-month stay limitation within each 12-month period, and includes the removal of 10 mobile homes and the improvement of 18 R.V. sites with water, electricity, and septic capacity. Any development other than the development described in Coastal Development Permit No. 1-97-77, including but not limited to (a) conversion of any portion of the approved facilities to a private or member only use or the implementation of any program to allow extended or exclusive use or occupancy of the facilities by an individual or limited group or segment of the public; (b) extending the stay limitations for R.V. usage; and (c) creating additional mobile home sites, is specifically not authorized by this permit and would require an amendment to this permit or a new permit from the Commission or its successor agency.

IV. Findings and Declarations.

The Commission finds and declares the following:

1. Project and Site Description:

a. Site Description.

The subject site is the Albion River Campground and Marina, located at Albion Flat on the north side of the Albion River, just east of the Highway One bridge. The site is used as a private campground and marina facility that accommodates both commercial fishermen and recreational boaters. The site is currently developed with 82 dry campsites (water and power only); 18 mobile home sites of which 17 are currently vacant and one is occupied by a mobile home for the manager; a small store/office building that is being reconstructed; restrooms and showers; a small marina including a pier, docks, and boat launch; and a small fish house.

Albion Flat is on the lower Albion River estuary floodplain. The site originally supported a lumber mill before being converted to the existing campground and marina complex. The flat encompasses an approximately 9.75-acre area in a boot-shaped configuration at a bend in the river and

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includes a narrow mooring basin that extends into and alongside the flat from the "toe" end of the boat.

The site is in an area designated as "highly scenic" by the Mendocino County Land Use Plan. The site is primarily visible from the Highway One bridge and from public roads within the Albion community atop and along the bluff on the south side of the river. There is no sensitive habitat on the site.

b. Project Description.

The proposed project consists of various improvements at the Albion River Campground and Marina, including the conversion of the mobile home park containing 18 mobile home sites to a recreational vehicle park with 18 R.V. sites with sewer hook-ups for short-term, transient use only, and a manager's mobile home site; repair and upgrade of water, septic, and electrical services, pursuant to requirements by the California Department of Housing and Community Development; and the demolition and removal of ten dilapidated mobile homes, which has already taken place without benefit of a coastal permit.

c. Project History.

In 1978, Mendocino County approved a use permit (#U 84-77) to convert an existing mobile home park and campground (previously allowed by the Planning Commission's approval of use permit #U 54-71 in 1972) to an 86-space recreational vehicle park with a convenience store, snack bar, laundry facility, restrooms, and office. The use permit was approved exclusively for recreational vehicles, and no permanent mobile homes were allowed; the previously existing mobile homes were to be phased out and replaced by recreational vehicle spaces. At that time there were 19 mobile home spaces and 82 R.V. spaces. The applicant did not convert the mobile home sites to R.V. sites, and also did not obtain a coastal development permit from the Coastal Commission for the conversion.

A number of coastal permits obtained through the years by the applicant for the site were not exercised and subsequently expired, including CDP 80-A-43 for construction of a temporary storage shed, and CDP 1-83-49 for construction of a recreation building. In 1990 the applicant obtained an exemption to replace a 975-square-foot bath house destroyed by fire with a new 960-square-foot bath house building.

In 1994 the Commission granted to the applicant CDP 1-93-35 for dredging at the site. In 1994 the Commission also approved CDP 1-93-36 for the construction of a concrete seawall to protect the site from bank erosion, and in 1997 approved an amendment to this permit to allow for installation of rock rip-rap revetment along the existing riverbank instead of constructing the concrete seawall two to three feet inshore of the existing riverbank.

The current coastal permit application initially also included demolition and reconstruction of an existing store/office building in existence since approximately 1970, and replacement of the existing failed septic system with a new septic system; this development was recently approved pursuant to Coastal Permit Waiver No. 1-98-004-W and is not now part of Coastal Permit 1-97-77.

d. State Lands Commission Jurisdiction.

The California State Lands Commission (State Lands) has jurisdiction over State-owned lands in the beds of tidal and navigable waterways within the State's boundaries and over lands subject to the public trust. The subject property owners currently have a lease from State Lands for some tide and submerged lands on which there are floating docks.

The dry land area where the specific developments proposed under Permit Application No. 1-97-77 are located is not covered by the lease, and the extent of the State's ownership interest is uncertain. State Lands indicates that the subject property may include lands the State acquired and disposed of as Tideland Survey 21 (Mendocino County). The extent and location of the State's ownership in the bed of the Albion River at this location, however, is undetermined. State Lands further indicates that the Albion River is a navigable waterway subject to a public navigational easement that provides that members of the public have the right to navigate and to exercise the incidents of navigation in a lawful manner on State waters that are capable of being physically navigated either by oar or by motor propelled small craft. Such uses may include but are not limited to boating, rafting, rowing, fishing, fowling, skiing, and other water-related public uses. The uses of the land must not restrict or impede these rights of the public. However, in light of the uncertainty of the exact location of the State's sovereign interest in the area, State Lands is currently not requiring an amendment to the Setos' lease with State Lands for the proposed development.

2. New Development:

Section 30250(a) of the Coastal Act states that new development shall be located within or near existing developed areas able to accommodate it or, where such areas are not able to accommodate it, in other areas with adequate public services and where it will not have significant adverse effects, either individually or cumulatively, on coastal resources.

The proposed project consists of a change in use from a mobile home park to an R.V. park, and various improvements at the Albion River Campground including repair of the existing sewage collection system and on-site sewage disposal system for the proposed new R.V. sites. The project is located within an existing recreational development that is not connected to any public water system or sewage treatment facility. Water for the site is pumped from on-site wells across the river, and there will be two septic systems on-site,

one to serve the store and shower facility, and one to serve the proposed R.V. sites. The Mendocino County Department of Environmental Health has indicated that the design of the repair septic systems has been done in accordance with Mendocino County and State Water Quality Control Board guidelines and is acceptable.

The Commission thus finds that the proposed project is consistent with Coastal Act Section 30250(a) to the extent that services will be provided and the project will not have significant adverse effects on coastal resources such as groundwater.

3. Recreational Use:

Coastal Act Section 30213 states in part that lower cost visitor and recreational facilities shall be protected, encouraged, and, where feasible, provided, and that developments providing public recreational opportunities are preferred.

Section 30221 states that oceanfront land suitable for recreational use shall be protected for recreational use and development unless present and foreseeable future demand for public or commercial recreational activities that could be accommodated on the property is already adequately provided for in the area.

Section 30222 states:

The use of private lands suitable for visitor-serving commercial recreational facilities designed to enhance public opportunities for coastal recreation shall have priority over private residential, general industrial, or general commercial development, but not over agriculture or coastal-dependent industry.

The proposed project involves the conversion of 18 mobile home sites to R.V. sites for short-term, transient use only. Apart from the residential use associated with mobile homes, the site is currently a visitor-serving recreational facility that provides 82 "dry" campsites and river access. The proposed new R.V. sites will cost approximately \$350-\$375/month, and the fee for the dry campsites is approximately \$16-\$20 a night, which qualifies the campground/marina as a "lower-cost" recreational facility. The applicant has indicated that the proposed new R.V. sites are for short-term, transient use only, with a six-month stay limitation within each 12-month period, consistent with the provisions of the certified LCP.

Since use at the site will be limited to short-term, transient recreational use only, pursuant to Special Condition No. 1, the Commission finds that the proposed conversion of the existing mobile home sites to R.V. sites with sewer hookups for short-term use only will provide additional lower cost visitor serving recreational facilities for public use. As the proposed development

will feasibly provide a lower cost visitor and recreational facility, the Commission finds that the proposed project is consistent with Section 30213 of the Coastal Act. In addition, as the development will provide for a recreational use on waterfront lands suitable for such use, the Commission finds that the proposed project is consistent with Section 30221. Furthermore, as the proposed project will convert a residential use to a visitor-serving commercial recreational facility, the Commission finds that the development is consistent with the priority established by Section 30222 for visitor-serving commercial recreational facilities over private residential use.

To assure that the site will remain a lower-cost visitor-serving recreational facility, consistent with the Sections 30213, 30221, and 30222 of the Coastal Act, the Commission attaches Special Condition No. 1 to the permit. This condition states that this coastal development permit authorizes the conversion of a mobile home park to a recreational vehicle park for short-term transient use only, with a six-month stay limitation within each 12-month period. The condition further states that any development other than the development described in Coastal Development Permit No. 1-97-77, including (a) conversion of any portion of the approved facilities to a private or member only use or the implementation of any program to allow extended or exclusive use or occupancy of the facilities by an individual or limited group or segment of the public, (b) extending the stay limitations for R.V. usage, and (c) creation of additional mobile home sites, is specifically not authorized by this permit and would require an amendment to this permit or a new permit from the Commission or its successor agency.

The Commission finds that the proposed project, as conditioned, is consistent with Coastal Act Sections 30213, 30221, and 30222.

4. Public Access:

Coastal Act Sections 30210, 30211, and 30212 require the provision of maximum public access opportunities, with limited exceptions. Section 30210 states that maximum access and recreational opportunities shall be provided consistent with public safety needs and the need to protect public rights, rights of private property owners, and natural resource areas from overuse. Section 30211 states that development shall not interfere with the public's right of access to the sea where acquired through use or legislative authorization, including, but not limited to, the use of dry sand and rocky coastal beaches to the first line of terrestrial vegetation. Section 30212 states that public access from the nearest public roadway to the shoreline and along the coast shall be provided in new development projects except where it is inconsistent with public safety, military security needs, or the protection of fragile coastal resources, adequate access exists nearby, or agriculture would be adversely affected.

In its application of these policies, the Commission is limited by the need to show that any denial of a permit application based on these sections, or any decision to grant a permit subject to special conditions requiring public access, is necessary to offset a project's adverse impact on existing or potential public access.

The proposed project consists of conversion of 18 mobile home sites to R.V. sites and various improvements to the Albion River Campground, which is located between the first public road and the Albion River, considered to be an arm of the sea. The applicants have obtained a lease from the State Lands Commission for a portion of the site that is on tide and submerged lands, and it is stipulated in the lease that access shall be provided to and through the leased area for the general public, including non-paying visitors, from both the river and across the Lessee's upland to assure public access from the first public road to the river and from the river to the first public road. The proposed improvements will not be located where they would block or otherwise interfere with this access use.

Since there is existing public access, and since the proposed development will not increase the demand for public access to the shoreline and will have no other impacts on existing or potential public access, the Commission finds that the proposed project, which does not include provision of additional public access, is consistent with the public access policies of the Coastal Act.

#### 7. Visual Resources.

Section 30251 protects the scenic and visual qualities of coastal areas, requiring that permitted development be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas. New development in highly scenic areas must be subordinate to the character of its setting.

As noted previously, the site is in an area designated as "highly scenic" by the Mendocino County Land Use Plan (LUP). The site is primarily visible from the Highway One Bridge and from public roads within the Albion community atop and along the bluff on the south side of the river.

As the project site is in a designated highly scenic area, new development must be visually subordinate to the character of its setting to be consistent with Section 30251.

As proposed, the project includes the conversion of 18 mobile home sites to R.V. sites, the demolition and removal of 10 dilapidated mobile homes, and various utility improvements. The permitted development is sited and designed to protect coastal views as (1) virtually all of the proposed utility



improvements will be buried underground, and (2) by locating the R.V. sites in the same location as the mobile home sites, the proposed development will not affect views to and along the Albion River and the ocean coast any more than the mobile home park has in the past. In addition, the proposed development involves no alteration of natural land forms. Furthermore, the proposed development will be subordinate to the character of the area as the development will not increase the amount, intensity, mass, or height of development at the site because the development is limited to replacing an 18-site mobile home park with a similar size R.V. park in the same location. Moreover, the removal of the dilapidated mobile homes will improve visual resources on the site, and there will be no significant adverse impacts to visual resources resulting from the proposed project. Therefore, the Commission finds that the proposed development is consistent with Section 30251 of the Coastal Act.

8. Mendocino County LCP:

As noted above, Mendocino County has a certified Local Coastal Program, and therefore issues its own coastal permits for those areas within its coastal zone jurisdiction. However, the proposed project is located within the Commission's area of original jurisdiction, so the project is subject to the Coastal Commission's permit authority, and the Coastal Act is the standard of review. The certified LCP is merely advisory. Nonetheless, the Commission finds the proposed project to be consistent with the policies of the LCP, as described below.

The subject site is designated Fishing Village (FV) in the Mendocino County LCP. The minimum lot area for Fishing Village districts is 40,000 square feet for lots not in a water or sewer service area. The subject site, which is 9.75 acres, is thus a legal conforming lot.

The proposed project is for a public recreational use, which is a principal permitted use in the Fishing Village designation, pursuant to Zoning Code Section 20.392.010(C).

Policy 3.9-1 of the LUP states that new development shall be located in or in close proximity to existing areas able to accommodate it, and shall be regulated to prevent any significant adverse effects, either individually or cumulatively, on coastal resources. Policy 3.8-1 of the LUP requires consideration of Highway One capacity and availability of water and sewage disposal when considering applications for Coastal Development Permits. The intent of this policy is to channel development toward more urbanized areas where services are provided and potential impacts to resources are minimized. As noted above, water and septic capacity will be provided for the site. The Commission thus finds that the proposed project is consistent with LUP Policy 3.9-1, 3.8-1, and 3.8-9, as it will be located where services are available and it will have no adverse impacts on coastal resources such as surface or ground water supplies.

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The Mendocino County LUP includes a number of policies regarding standards for providing and maintaining public access. Policy 3.6-9 states that offers to dedicate an easement shall be required in connection with new development for all areas designated on the land use plan maps. Policy 3.6-28 states that new development on parcels containing the accessways identified on the land use maps shall include an irrevocable offer to dedicate an easement. LUP Policy 3.6-22 and Zoning Code Section 20.528.030 state that no development shall be approved on a site which will conflict with easements acquired by the public at large by court decree. Where evidence of historic public use indicates the potential for the existence of prescriptive rights, but such rights have not been judicially determined, the County shall apply research methods described in the Attorney General's "Manual on Implied Dedication and Prescriptive Rights." Where such research indicates the potential existence of prescriptive rights, an access easement shall be required as a condition of permit approval.

As noted above, the project will not adversely affect public access, and the State Lands lease stipulates that access shall be provided to and through the leased area for the general public, including non-paying visitors, from both the river and across the Lessee's upland to assure public access from the first public road to the river and from the river to the first public road. Since the proposed development will not increase the demand for public access to the shoreline and will have no other impacts on existing or potential public access, the Commission finds that the proposed project, which does not include additional provision of public access, is consistent with the public access policies of the LCP.

Zoning Code Section 20.468.015 states that no persons or group of persons other than the owner or operator thereof shall permanently occupy any of the spaces in a recreational vehicle park, campground, or camping site for family or group residential use. Length of temporary occupancy in a recreational vehicle park is limited to a period of six months in any 12 month period for persons occupying vehicles with total hook-up capacity. As proposed, the 18 improved R.V. sites will be for short-term, transient use only, with a six-month stay limitation within each 12-month period. Special Condition No. 1 requires a permit amendment for any change to the project as proposed, including changes to the six-month stay limitation. Thus, as conditioned, the proposed project is consistent with Zoning Code Section 20.468.015 as the recreational vehicle park is proposed and authorized for temporary occupancy only.

The Commission thus finds that the proposed project, as conditioned, is consistent with the Mendocino County LCP.

**9. Alleged Violation:**

The ten dilapidated mobile homes have been demolished without benefit of a coastal development permit. Although unauthorized development has taken place

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prior to submission of this permit application, consideration of the application by the Commission has been based solely upon the Chapter 3 policies of the Coastal Act. Approval of the permit does not constitute a waiver of any legal action with regard to the alleged violation nor does it constitute an admission as to the legality of any development undertaken on the subject site without a coastal permit.

10. California Environmental Quality Act (CEQA):

Section 13096 of the California Code of Regulations requires Commission approval of Coastal Development Permit applications to be supported by a finding showing the application, as conditioned by any conditions of approval, to be consistent with any applicable requirements of the California Environmental Quality Act (CEQA). Section 21080.5(d)(2)(i) 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 impact which the activity may have on the environment.

The project does not have a significant adverse effect on the environment, within the meaning of CEQA, as it is located in an area able to accommodate it, and as there will be no significant adverse impacts on coastal resources. Therefore, the proposed development is consistent with the requirements of CEQA.

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## ATTACHMENT A

### 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. Compliance. All development must occur in strict compliance with the proposal as set forth in the application for permit, subject to any special conditions set forth below. Any deviation from the approved plans must be reviewed and approved by the staff and may require Commission approval.
4. Interpretation. Any questions of intent of interpretation of any condition will be resolved by the Executive Director or the Commission.
5. Inspections. The Commission staff shall be allowed to inspect the site and the development during construction, subject to 24-hour advance notice.
6. 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.
7. Terms and Conditions Run with the Land. These terms and conditions shall be perpetual, and it is the intention of the Commission and the permittee to bind all future owners and possessors of the subject property to the terms and conditions.

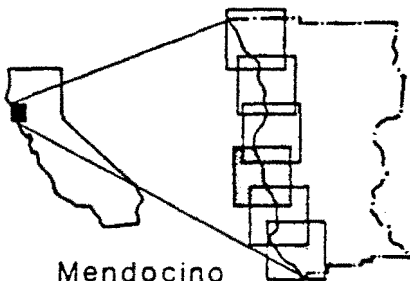
EXHIBIT NO. 1  
APPLICATION NO.  
1-97-77 (Seto)

Location Map



California Coastal Commission

APPROXIMATE  
LOCATION



Mendocino



California Coastal Commission

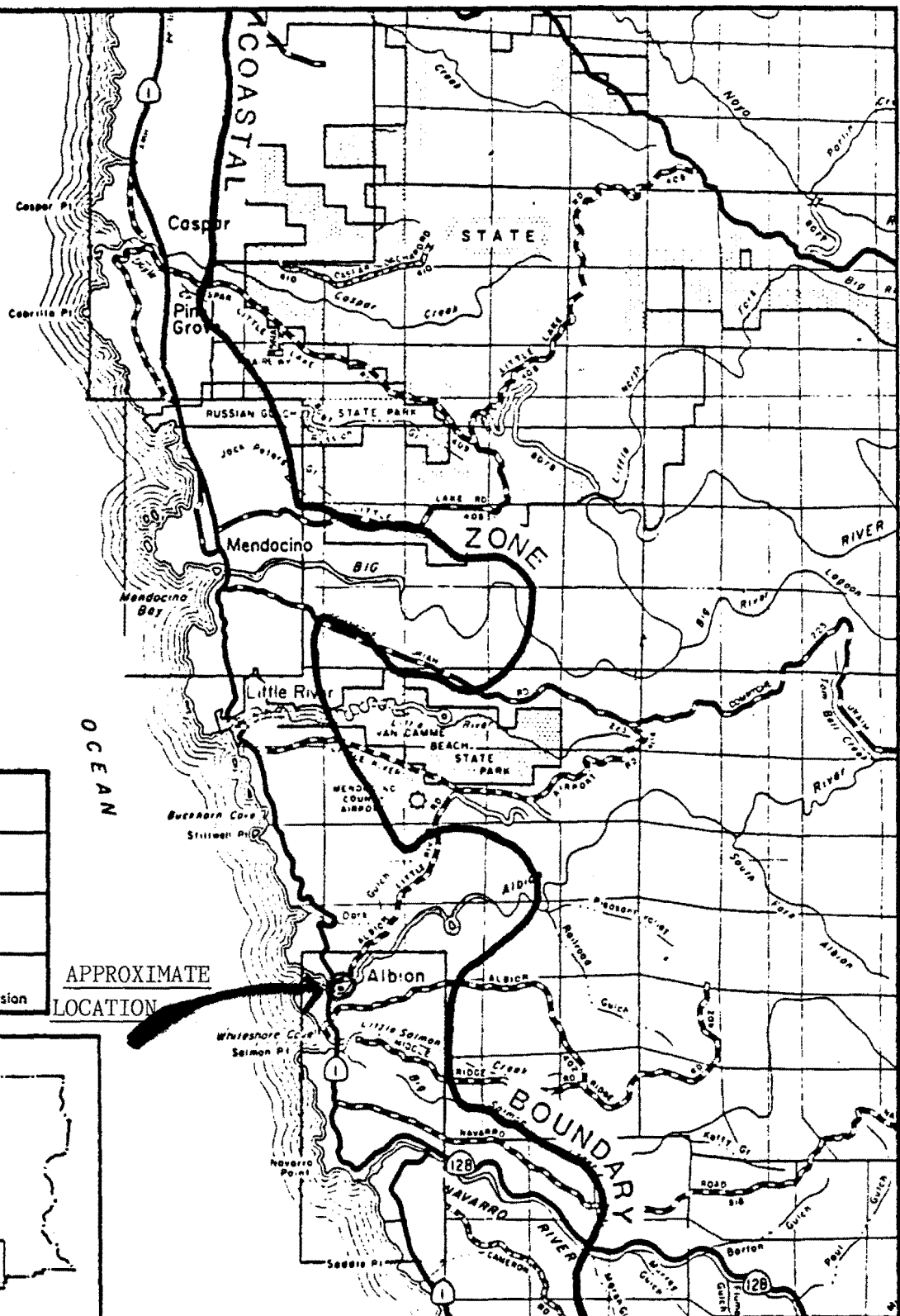
LOCATION MAP

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County of Mendocino

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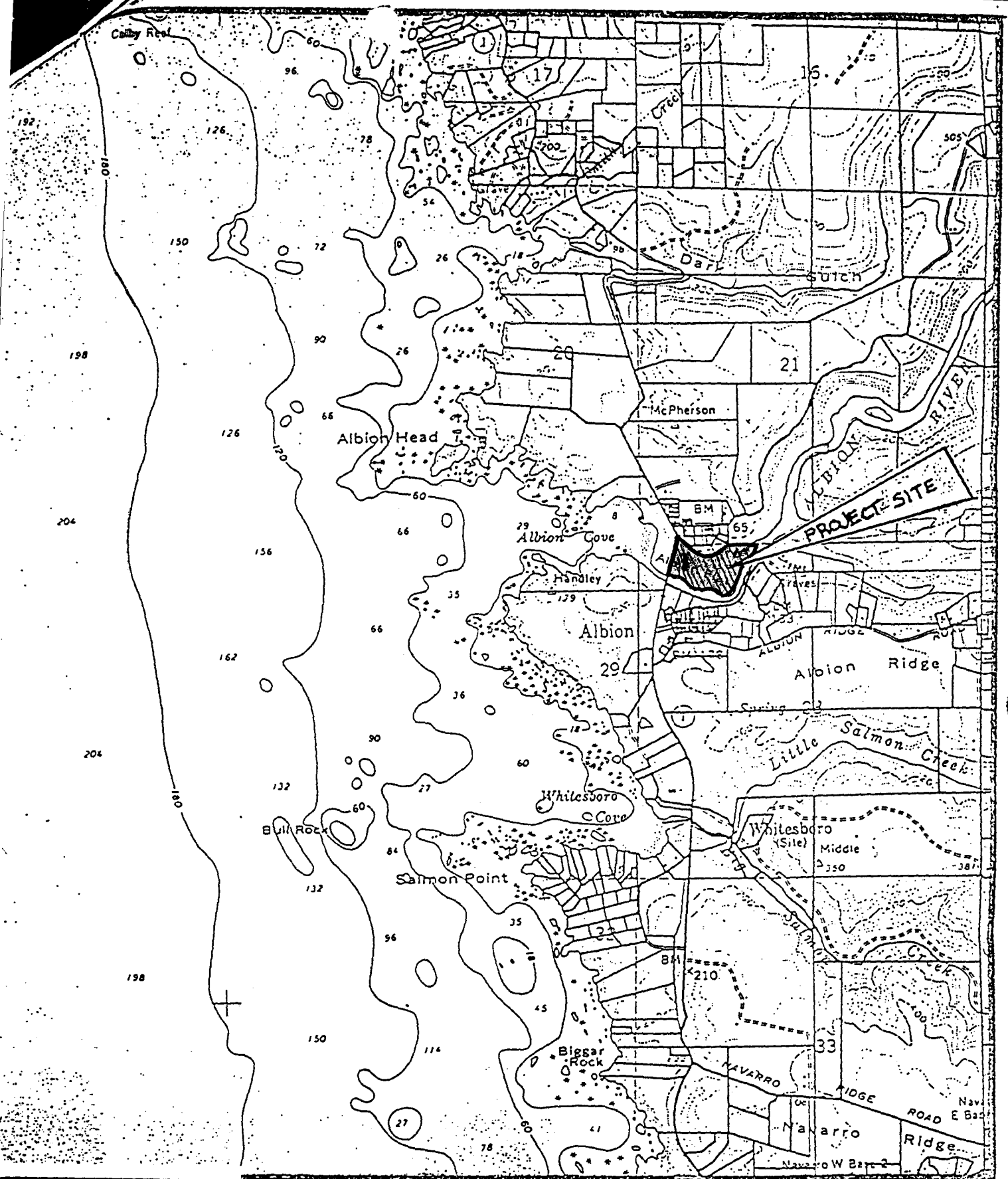



EXHIBIT NO. 2		OWNER: SETO		AGENT: R. Collin	
APPLICATION NO. 1-97-77 (Seto)		LOCATION MAP		SCALE: 1:2000	
Vicinity Map				 NORTH	

ALBION RIVER CAMPGROUND AND MARINA  
 1000 Albion River Road, Albion Ca. 95410  
 Owner: Sum Seto,  
 2655 Bush St.  
 San Francisco, Ca. 94115

ALBION RIVER RD.

END OF CO. RD.

EXISTING MOBILE HOME SPACES  
 TO BE CONVERTED TO 18 R.V. SPACES  
 AND ONE MOBILE HOME FOR MANAGER'S  
 RESIDENCE, AS PER CA. HOUSING AND  
 COMMUNITY DEVELOPMENT PERMIT.

STATE HIGHWAY 1 ALBION RIVER BRIDGE

LEACH FIELDS

STORE/OFFICE

48 DRY CAMP-SITES

34 DRY CAMP-SITES

RESTROOMS

COMM. DOCK

WATER LINE

PARKING

BOAT AND RV STORAGE

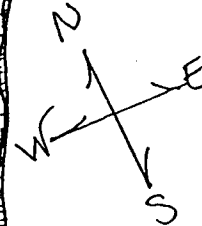
MOORING BASIN

SPORT

DOCKS

ALBION RIVER →

CAMPGROUND LAYOUT:  
 (18 R.V. SPACES PLUS  
 MOBILE HOME SPACE  
 AND 82 DRY CAMP-SITES)  
 SHOWN ACCORDING TO  
 CA. DEPT. OF HOUSING  
 AND COMMUNITY  
 DEVELOPMENT PERMIT  
 # 123-0054 INCLUDING:  
 PLANS ON FILE FOR  
 ENGINEERED REPAIRS  
 AND REPLACEMENT OF  
 EXISTING SEWAGE  
 DISPOSAL SYSTEMS;  
 NEW ELECTRIC AND  
 WATER SUPPLY LINES  
 AND NEW PEDESTALS  
 AS PER APPLICABLE  
 STATE CODES, AND  
 SUBJECT TO INSPECTION  
 BY H.C.D.



SCALE: 1" = 100'

PREPARED BY: R. COLLIN 1361 CAMERON RD. ELK, CA 95

EXHIBIT NO. 3
APPLICATION NO. 1-97-77 (Seto)
Site Plan

ALBION RIVER CAMPGROUND AND MARINA  
 33800 Albion River Road, Albion Ca. 95410  
 Owner: Sum Seto,  
 2655 Bush St.  
 San Francisco, Ca, 94115

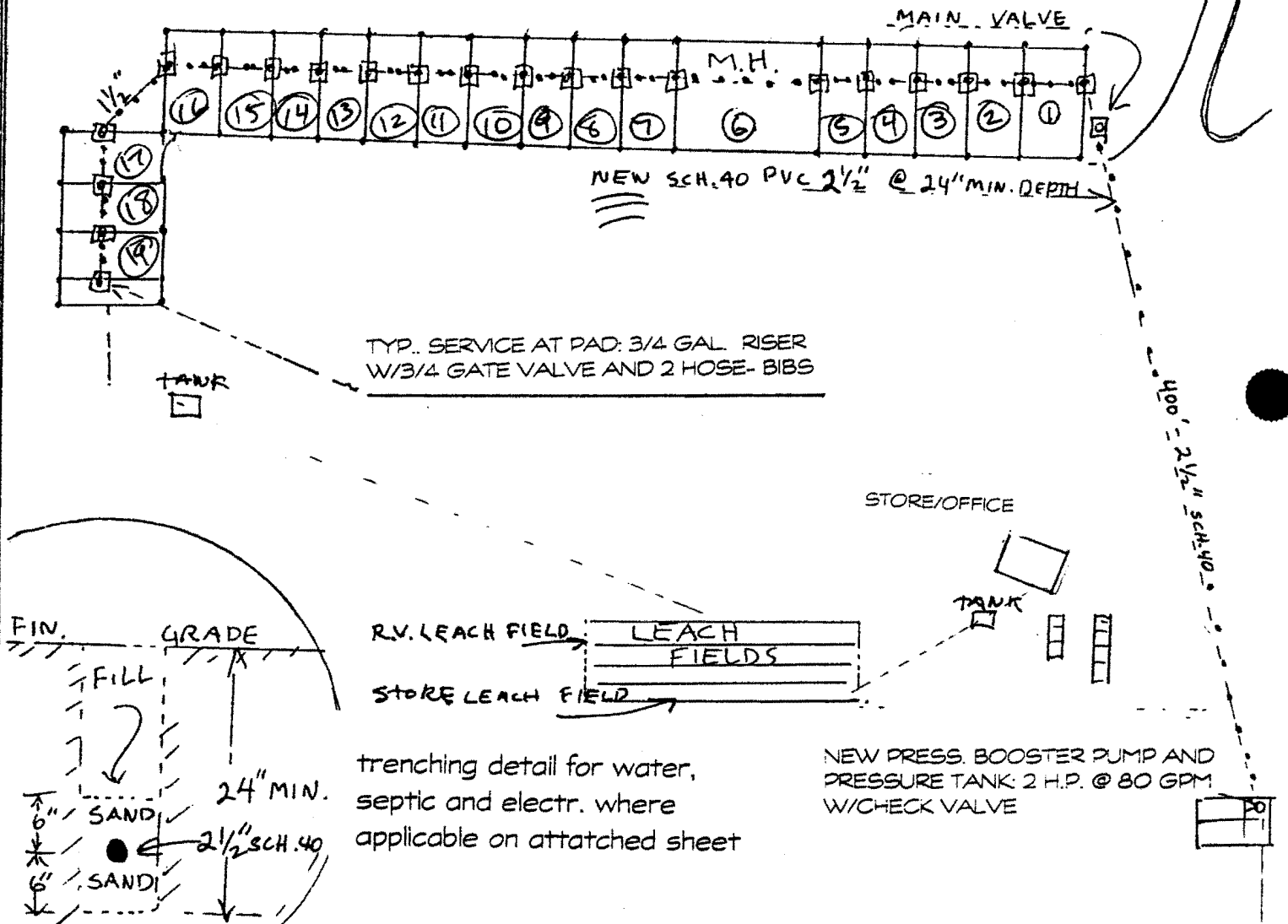
EXHIBIT NO. 4

APPLICATION NO.  
 1-97-77 (Seto)

Plans to Repair

Water Systems

CAMPGROUND LAYOUT (18 R.V. SPACES PLUS 1 MOBILE HOME SPACE, AND 82 DRY CAMP-SITES) SHOWN ACCORDING TO CA. DEPT OF HOUSING AND COMMUNITY DEVELOPMENT PERMIT # 123-0054



PLANS TO REPAIR EXISTING WATER SYSTEMS  
 @ ALBION CAMPGROUND AND MARINA FOR  
 R.V. SPACES AND ONE MOBILE HM. SITE



## Project Plans

