

CALIFORNIA COASTAL COMMISSION

South Coast Area Office
 1000 Oceangate, Suite 1000
 Long Beach, CA 90802-4302
 (562) 590-5071



Filed: June 20, 2000
 49th Day: August 8, 2000
 180th Day: December 17, 2000
 Staff: ALK-LB *ALK*
 Staff Report: July 20, 2000
 Hearing Date: August 8-11, 2000
 Commission Action:

STAFF REPORT: REGULAR CALENDAR

APPLICATION NUMBER: 5-00-174

APPLICANT: El Morro Investment Company

AGENT: Jack De Camp, Manager of El Morro Village Mobile Home Park

PROJECT LOCATION: 8811 N. Coast Highway, Space #224, Crystal Cove State Park, County of Orange

PROJECT DESCRIPTION: Demolish an existing laundry facility and install a new mobile home unit for the manager of El Morro Village Mobile Home Park.

APPROVALS RECEIVED: State Department of Parks and Recreation Mitigated Project Approval dated January 12, 2000 and State Department of Housing and Community Development Permits to Construct dated May 9, 2000 and May 11, 2000.

SUBSTANTIVE FILE DOCUMENTS: Crystal Cove State Park Public Works Plan, 1982; letter from Chambers Group dated April 28, 2000; and State Department of Parks and Recreation letter dated July 12, 2000.

SUMMARY OF STAFF RECOMMENDATION:

The applicant is proposing to demolish an existing laundry facility and install a new mobile home unit at El Morro Village Mobile Home Park within Crystal Cove State Park on the inland side of Pacific Coast Highway. The major issue of the staff report is preservation of potential archaeological resources.

Staff recommends the Commission **APPROVE** the proposed development with three (3) special conditions. Special Condition No. 1 requires conformance with archeological management and protection measures recommended by staff of the State Department of Parks and Recreation. Special Condition No. 2 notifies the applicant that the new mobile home unit is subject to the terms and conditions of the lease with the State Department of Parks and Recreation. Special Condition No. 3 notifies the applicant of coastal development permit requirements for any future development.

This is an after-the-fact permit, as construction was initiated without benefit of a coastal development permit.

STAFF RECOMMENDATION:

The staff recommends that the Commission adopt the following resolution:

I. APPROVAL WITH CONDITIONS

The Commission hereby **GRANTS** a permit, subject to the conditions below, for the proposed development on the grounds that the development will be in conformity with the provisions of Chapter 3 of the California Coastal Act of 1976, 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 of the Coastal Act, is located between the sea and 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 effects on the environment within the meaning of the California Environmental Quality Act.

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 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 this permit is reported to the Commission. 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

1. **Archaeological Resource Management and Protection**

A. The applicant shall comply with all recommendations and mitigation measures contained in the letter submitted the State Department of Parks and Recreation dated July 12, 2000 (Exhibit 5). The applicant shall also comply with the following monitoring condition during construction:

- (1) A State Department of Parks and Recreation-certified or County-certified archaeological field observer, working under the direction of a State Department of Parks and Recreation-certified or County-certified archaeologist, shall monitor all activities that may result in ground disturbance.

B. If an area of cultural deposits is discovered during the course of the project:

- (1) All construction activities shall cease and shall not recommence except as provided in subsection (C) hereof; and
- (2) Within 90 days after the date of discovery of such deposits, the applicant shall provide evidence to the Executive Director of execution and recordation of a lease restriction, in a form and content acceptable to the Executive Director, stating that, in order to protect archaeological resources, development can only be undertaken consistent with the provisions of the Public Works Plan for Crystal Cove State Park dated 1982 and supplementary archeological plans thereto approved by the Executive Director.

The lease restriction shall run with the land, binding all successors and assigns, and shall be recorded free of prior liens that the Executive Director determines may affect the enforceability of the restriction. This lease restriction shall not be removed or changed without an amendment to this coastal development permit (5-00-174) approved by the Coastal Commission.

C. An applicant seeking to recommence construction following discovery of the cultural deposits shall submit a supplementary archaeological plan for the review and approval of the Executive Director.

- (1) If the Executive Director approves the supplementary archaeological plan and determines that the supplementary archaeological plan's recommended changes to the proposed development or mitigation measures are de minimus in nature and scope, construction may recommence after the Executive Director receives evidence of recordation of the lease restriction required above.
- (2) If the Executive Director approves the supplementary archaeological plan but determines that the changes therein are not de minimus, construction may not recommence until after an amendment to this permit is approved by the Commission and the Executive Director receives evidence of recordation of the lease restriction required above.

2. Compliance with Lease

The applicant shall comply with all terms and conditions of the lease between the El Morro Village Mobile Home Park and the State Department of Parks and Recreation.

3. Future Improvements

Coastal Development Permit 5-00-174 is only for the development located at the El Morro Village Mobile Home Park, 8811 N. Coast Highway, Space #224, Crystal Cove State Park, County of Orange, as expressly described and conditioned herein. Any future improvements or development as defined in Section 30106 of the Coastal Act shall require an amendment to this permit or a new coastal development permit from the Coastal Commission or its successor agency.

IV. FINDINGS AND DECLARATIONS:

The Commission hereby finds and declares:

A. Project Location and Description

The subject site is located at 8811 N. Coast Highway in the City of Laguna Beach, Orange County. The property is located within the El Morro Village Mobile Home Park at Crystal Cove State Park. The subject site is located on the inland side of Pacific Coast Highway (Exhibits 1 and 2).

The applicant, who manages the mobile home park through an agreement with the State Department of Parks and Recreation (DPR), proposes to demolish an existing laundry facility, remove approximately 300 square feet of asphalt paving and install a new mobile home unit for the manager of the mobile home park. The proposed mobile home unit will be a 28' x 62' (1736 square foot), one-story, 14' high structure supported by an aboveground wood and concrete block base. The mobile home does not require installation of a subterranean foundation system.

The project also involves the installation of an 18' by 20' freestanding awning adjacent to the proposed mobile home. The awning will serve to cover two (2) existing asphalt parking spaces, forming a carport for the proposed manager's unit. Project plans are provided in Exhibit 3.

According to the applicant, the laundry facility at the subject site is no longer required as the mobile home park has three (3) other laundry facilities currently in use and many mobile home owners now have their own laundry hook-ups.

B. Standard of Review and Consistency with the Crystal Cove Public Works Plan

Section 30605 of the Coastal Act provides, in pertinent part, that:

Where a plan for a public works or state university or college or private university development project has been certified by the commission, any subsequent review by the commission of a specific project contained in the certified plan shall be limited to imposing conditions consistent with Sections 30607 and 30607.1.

Section 30606 of the Coastal Act states:

Prior to the commencement of any development pursuant to Section 30605, the public agency proposing the public works project, or state university or college or private university shall notify the Commission and other interested persons, organizations, and governmental agencies of the impending development and provide data to show that it is consistent with the certified Public Works Plan or Long Range Development Plan. No development shall take place within 60 working days after the notice.

Section 13359 of the Commission's Administrative Regulations states:

(b) The Commission shall...determine whether the proposed development is consistent with the certified public works plan...

The Crystal Cove Public Works Plan (PWP) was approved by the Commission with conditions on May 20, 1982. Conditions were met in August 26, 1982. The PWP includes the Crystal

Cove State Park General Plan, the On-Site Maintenance Plan and the Crystal Cove State Park Historic District Plan. Section 30605 of the Coastal Act, cited above, establishes the standard of review. The first threshold question is whether the specific project is contained in the PWP. If it is, then the Commission's review is limited to the imposition of conditions. The Commission can not deny a project which it previously certified as part of the PWP; however, the Commission can regulate the manner in which the project is carried out to bring it into conformance with the PWP. Therefore, the first question is whether this project is contained in the Certified Public Works Plan.

The Land Use and Facilities Element of the Certified PWP General Plan addresses the mobile home park as follows:

...the El Morro Mobile Home Park is located around the mouth of the Moro Creek. In lieu of relocation rights, the state has arranged 20-year leases for the current tenants. Removal of the mobile home park will occur after the leases expire...

After the mobile home park is removed, day-use activity areas and picnic facilities will be located along both sides of Moro Creek, in Moro Canyon.

The leases have been extended and are set to expire on December 31, 2004. Until such time, the existing mobile homes are an allowable use at the subject site. However, the PWP does not address the installation of new mobile home units. In that respect, the proposed project is a form of development not specifically allowed under the PWP.

Additionally, the project is not being proposed by a public agency as specified by Section 30605, but is instead being proposed by a private entity—the El Morro Village Mobile Home Park operator. Furthermore, the installation of a new manager's unit cannot be considered a "public works" project as defined by Section 30114. As such, the policies contained in the Crystal Cove Public Works Plan regarding public works do not apply to the current project. Therefore, the Commission must use the Coastal Act as the standard of review and the PWP as guidance where applicable.

The proposed development may involve potential impacts to cultural resources since it includes subsurface activity. The Coastal Act requires reasonable mitigation measures to be imposed "*where development would adversely impact archaeological or paleontological resources as identified by the State Historic Preservation Officer.*" In addition, the General Plan of the certified PWP includes a discussion and policies regarding the management and protection of cultural resources. The management of cultural resources is governed by Sections 5019.74, 50/97.5 and 5097.9 of the Public Resources Code.

Numerous archaeological sites have been identified throughout Crystal Cove State Park. The subject site is adjacent to an area identified as CA-ORA-280. The PWP contains specific recommendations for the cultural resources identified by geographic area. The policies of the PWP call for the use of proper archaeological methods and agreed upon disposition of resources where cultural resources are likely to be found. The State Department of Parks and Recreation (DPR) issued an approval requiring that mitigation be incorporated (Exhibit 4). As such, the Commission is imposing Special Condition 1, which requires the implementation of these specific archaeological preservation and management measures recommended by DPR. Therefore, as conditioned in Section D, the proposed project is consistent with the Coastal Act, as well as the cultural resources management and protection policies of the certified Public Works Plan.

C. New Development

Section 30250 of the Coastal Act states, in pertinent part:

(a) New residential, commercial, or industrial development, except as otherwise provided in this division, shall be located within, contiguous with, or in close proximity to, 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. In addition, land divisions, other than leases for agricultural uses, outside existing developed areas shall be permitted only where 50 percent of the usable parcels in the area have been developed and the created parcels would be no smaller than the average size of surrounding parcels.

The Coastal Act requires that new development be located in areas able to accommodate the development without adverse impacts. The proposed development involves the removal of an existing laundry facility and the placement of a new mobile home unit in the El Morro Village Mobile Home Park. The size of the proposed mobile home unit conforms to the size of existing units within the mobile home park. The lot is located along a primary circulation route; therefore ingress and egress is provided. In addition, the proposed project will not adversely impact native coastal vegetation, as the subject site has been previously developed with a laundry facility.

The infrastructure supporting the surrounding mobile home units (sewer, water, etc.) is already established; therefore no significant utility extensions will be required. The applicant initially anticipated that approximately five (5) cubic yards of grading would be required for trenching to relocate existing utility lines. However, the lines were determined to be more accessible and the project no longer requires the originally specified amount of trenching. Nonetheless, any proposed grading activities may affect archaeological resources at the subject site. Consequently, appropriate measures must be undertaken to ensure that the site is preserved and protected. Archaeological resources are discussed in Findings Section D.

The Commission finds that the proposed development, as conditioned below, is in an area able to accommodate it, poses no adverse impacts to coastal resources and is consistent with Section 30250 of the Coastal Act.

D. Archaeological Resources

Section 30116 of the Coastal Act states, in pertinent part,

"Sensitive coastal resource areas" means those identifiable and geographically bounded land and water areas within the coastal zone of vital interest and sensitivity.

"Sensitive coastal resource areas" include the following:

(d) Archaeological sites referenced in the California Coastline and Recreation Plan or as designated by the State Historic Preservation Officer.

Section 30244 states, in pertinent part,

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

The proposed development will occur on a previously developed lot within the El Morro Village Mobile Home Park. A laundry facility and asphalt paving currently exist at the subject site. The site was originally graded during construction of the mobile home park in 1969.

Although previously developed, the site is located in an area that has been identified by the State Department of Parks and Recreation (DPR) as a designated prehistoric archaeological site referenced as CA-ORA-280. In a "Historical Facility and Archaeological Site Project Evaluation" prepared as part of DPR's review of the proposed project (attached as Exhibit 4), a staff archaeologist determined that the project has the potential to impact archaeological resources. As stated in the evaluation,

"due to the possibility of encountering intact prehistoric cultural resource deposits during trenching activities associated with utilities emplacement, etc., excavation, or ground-disturbing activity of any kind, prehistoric cultural resources could be impacted. A cultural resources specialist should be on site when construction occurs. If cultural resource deposits (associate with ORA 280) are encountered during construction activities, the archaeologist will halt excavation and evaluate the finds. In this case, the proposed development should then be modified to best protect any cultural remains encountered."

Commission staff has been working with State Department of Parks and Recreation (DPR) staff, in conjunction with the State Historic Preservation Officer, on the current project to ensure that there are no adverse impacts on the archaeological site. In addition, the applicant has contracted with an independent consultant to carry out an archaeological reconnaissance of the subject site (Exhibit 6). This was done to determine if demolition of the laundry facility and removal of the asphalt, which has already occurred, resulted in any disturbance of archaeological resources. The report indicates that no resources were affected by the construction carried out to date. However, the reconnaissance only evaluated the portion of the project that has already occurred and not the entire project.

On July 12, 2000, an Associate Park and Recreation Specialist with DPR submitted a letter regarding the proposed project (Exhibit 5). The letter does not suggest that the new mobile home unit not be installed, but advises against any ground disturbance associated with landscaping, irrigation, trailer support structures and utilities. The letter also recommends that site development not contribute to any erosion to adjacent property from improper drainage. To mitigate potential adverse impacts, staff of State Parks has also provided specific prescriptive measures. These include placement of filter fabric across the project site, placement of culturally sterile fill material over the site, appropriate grading and drainage, and the elimination of any paving, planters or other harden structures from the proposed project.

DPR staff recommends that approximately 1 to 1.5 feet of sterile fill material be placed on the subject site over a layer of filter fabric. This will ensure that any potential archaeological artifacts located below the ground surface will remain undisturbed. The additional fill material will also help to direct runoff away from the adjacent Crystal Cove State Park and toward the frontage street. Proper drainage and runoff control measures will ensure that potential archaeological resources (as well as the adjacent State Park property) are not disturbed through erosion. To ensure proper implementation, these measures should be carried out under the supervision of an archaeological professional.

To ensure that the proposed project does not affect archaeological resources, the Commission finds it necessary to impose Special Conditions 1, 2, and 3. Special Condition 1 requires the applicant to have a certified archaeological field observer monitor proposed grading activities to minimize any potential adverse effects to archaeological resources. Special Condition 2

requires the applicant to submit a grading, drainage and runoff control plan demonstrating that the project has been designed, and will be carried out, in conformance with the above-referenced measures prescribed by the State Department of Recreation staff. Special Condition No. 3 is a notification of coastal development permit requirements for any future development at the subject site. This will ensure that any proposed improvements or new development will be in conformance with underlying archaeological protection requirements.

These conditions will ensure that installation of the proposed manager's unit will not result in adverse effects to potential cultural and historic resources at the ORA 280 archaeological site. As conditioned, the Commission finds that the proposed project is consistent with Section 30244 of the Coastal Act.

E. Unpermitted Development

Without benefit of a coastal development permit, the applicant has initiated the proposed project. However, consideration of the permit application by the Commission has been based solely on the consistency of the proposed development with the policies of Chapter 3 of the Coastal Act. Commission action on this permit does not constitute a waiver of any legal action with regard to the alleged unpermitted development, nor does it constitute admission as to the legality of any development undertaken on the subject site without a coastal development permit.

F. California Environmental Quality Act

Section 13096(a) of the Commission's administrative 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)(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 project is located within an existing mobile home park. Development already exists on the subject site. In addition, the proposed development has been conditioned, as follows, to assure the proposed project is consistent with the archeological protection policies of the Coastal Act: Special Condition No. 1 requires implementation of archeological management and protection measures. Special Condition No. 2 requires the submittal of a grading, drainage, and runoff control plan. Special Condition No. 3 is a notification of coastal development permit requirements for any future development.

As conditioned, no feasible alternatives or feasible mitigation measures are known, beyond those required, which would substantially lessen any identified significant effect which the activity may have on the environment. Therefore, the Commission finds that the proposed project, as conditioned, is consistent with CEQA and the Chapter Three policies of the Coastal Act.

920

IRVINE

SAN JOAQUIN HILLS TRANSPORTATION CORRIDOR

LAGUNA COAST WILDERNESS PARK

CRYSTAL COVE STATE PARK

LAGUNA BEACH

MT. INSTITUTION OF CALIFORNIA

- SEE 81
- 1. TOWN OF
 - 2. COUNTY OF
 - 3. COUNTY OF
 - 4. COUNTY OF
 - 5. COUNTY OF
 - 6. COUNTY OF
 - 7. COUNTY OF
 - 8. COUNTY OF
 - 9. COUNTY OF

EXHIBIT No. 1

Project Number:
5-00-174

Vicinity Map

California Coastal Commission

SUBJECT SITE

PACIFIC OCEAN

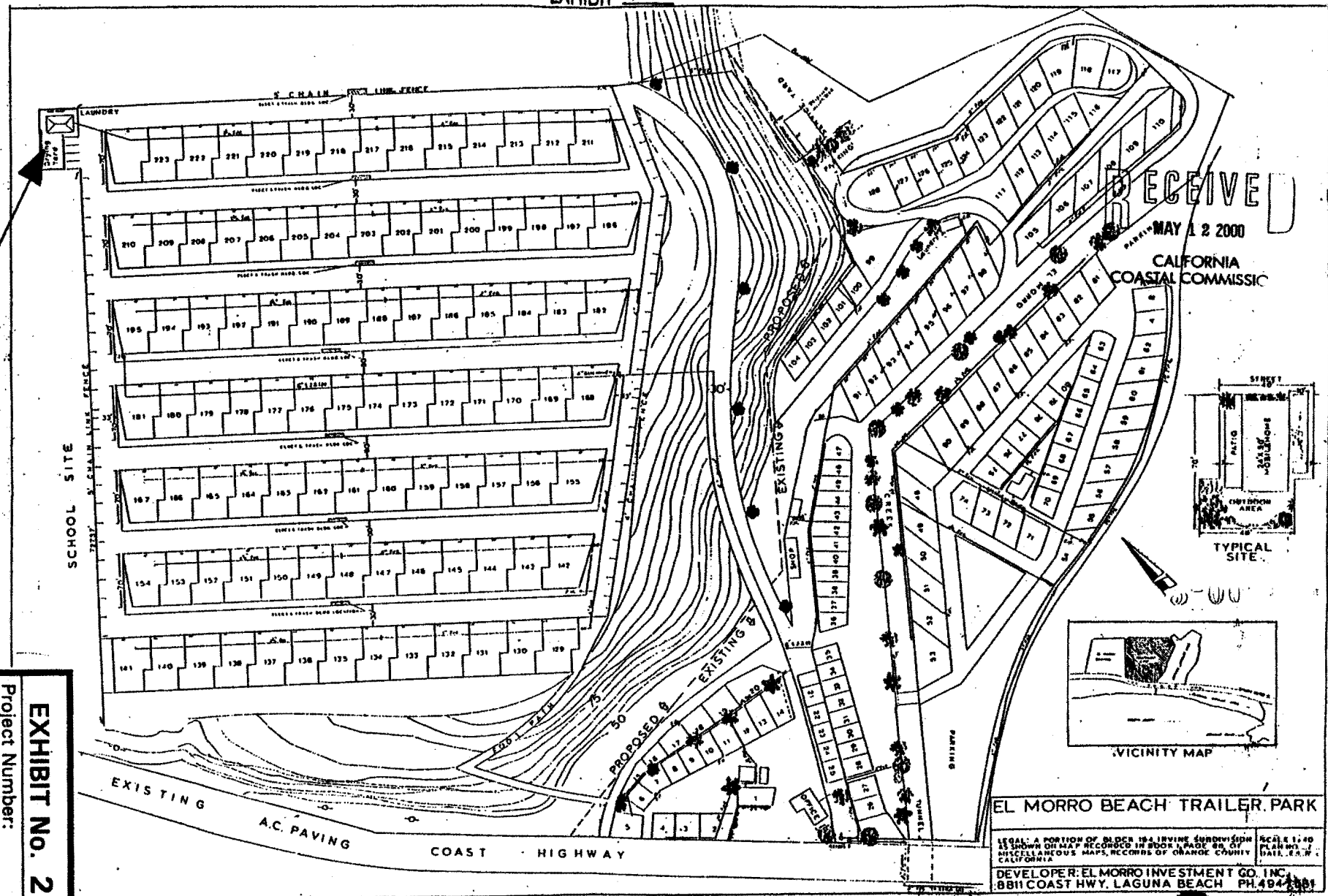
MELICAM HILL GOLF CLUB

CRYSTAL COVE STATE PARK

COAST HIGHWAY

EXHIBIT A

SUBJECT SITE

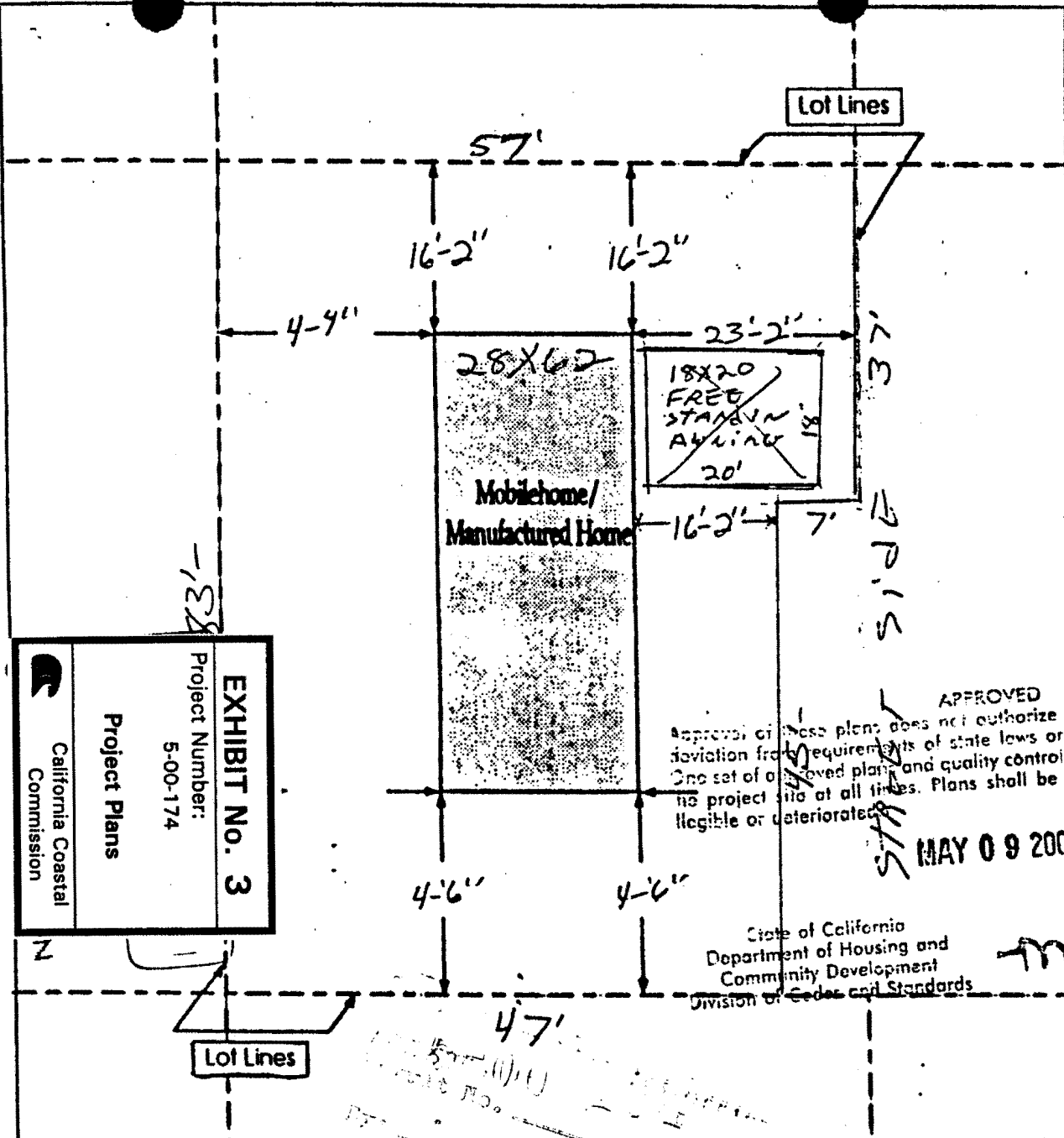


RECEIVED
MAY 12 2000
CALIFORNIA
COASTAL COMMISSION

EXHIBIT NO. 2
Project Number:
5-00-174
Map of El Morro
Mobile Home Park
California Coastal
Commission

EL MORRO BEACH TRAILER PARK
LEGAL: A PORTION OF BLOCK 194 IRVINE SUBDIVISION
AS SHOWN ON MAP RECORDED IN BOOK 1 PAGE 88 OF
MISCELLANEOUS MAPS, RECORDS OF ORANGE COUNTY
CALIFORNIA
DEVELOPER: EL MORRO INVESTMENT CO., INC.
8811 COAST HWY, LAGUNA BEACH PH. 494-3381
SCALE 1" = 40'

State of California
 Department of Housing and
 Community Development
 Division of Codes and Standards
 (See instructions/information on back)



A. Park Name THE FL MORRO BEACH
 Address 8811 COAST HWY EA
 City LAGUNA BEACH TO

B. Home Owner Newport Pacific Capital
 Address SAME AS ABOVE
 City _____ Zip _____
 Space or Lot # 224

C. Applicant Pacific MHPMST
 Address 13551 PROGRESSIVE AVE
 City COVINA CA TO
 Telephone (909) 737-8277

D. Design Information:

Home Design	Site Design
Home Amperage: <u>100</u>	Pedestal Amperage: <u>100</u>
Roof Load: <u>20</u> psf	Roof Load: <u>15</u> psf

E. I, the undersigned, as owner or operator/manager of this park, hereby certify that all lot lines as shown on this plot plan are true and accurate. I also certify that the lot line corners are clearly and permanently marked in the following manner:

STEEL MARKERS

[Signature] 4/9/00
 Park Owner or Operator/Manager Date
 (Signature required)

EXHIBIT No. 3
 Project Number: 5-00-174
 Project Plans
 California Coastal Commission

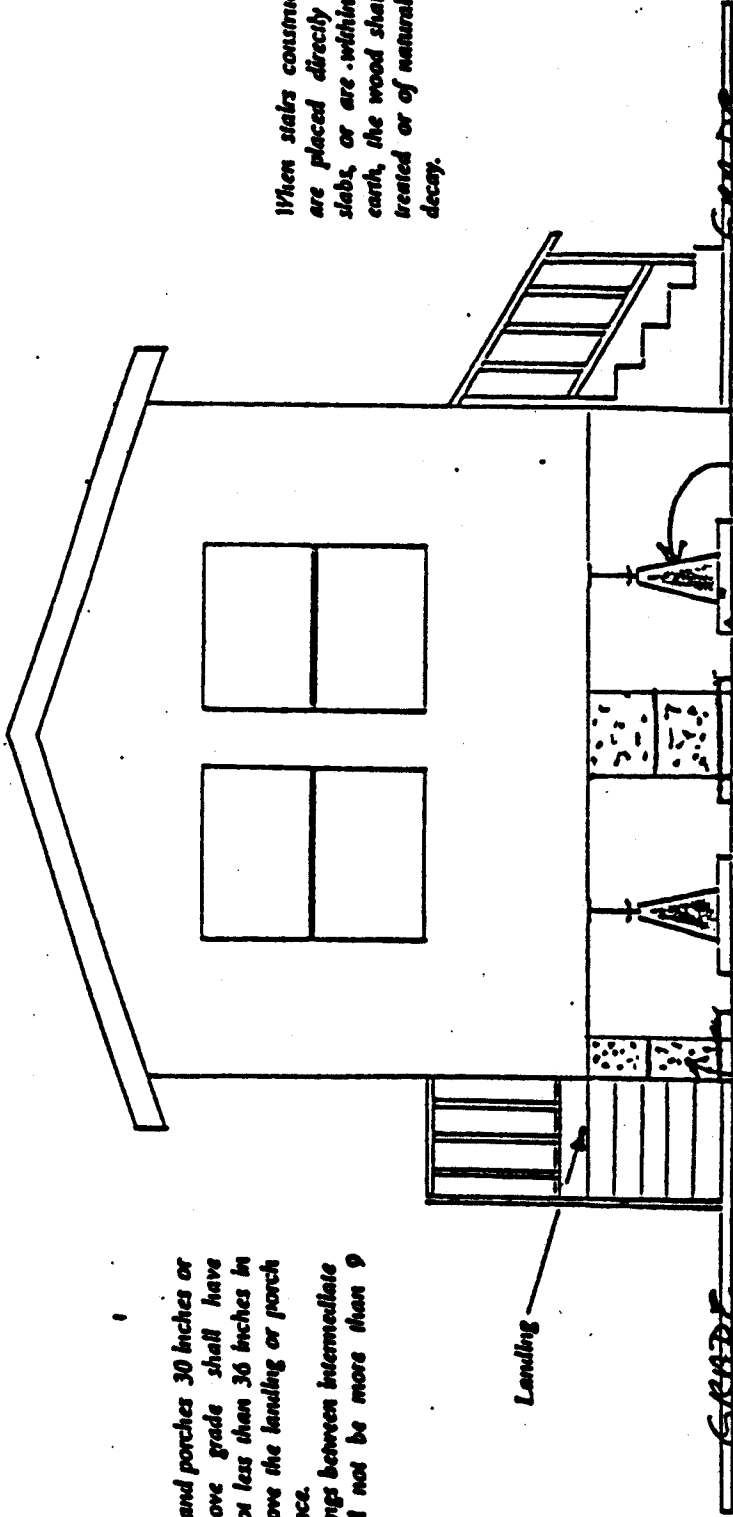
PLOT PLAN
 HCD 538 (Revised 11-93)

A. Length and width of mobilehome/manufactured home: (See above)
 B. Length and width of lot: (See above)

Document B

Landings and porches 30 inches or more above grade shall have railings not less than 36 inches in height above the landing or porch floor surface.
The openings between intermediate rails shall not be more than 9 inches.

When stairs constructed of wood are placed directly on concrete slabs, or are within 6 inches of earth, the wood shall be pressure treated or of natural resistance to decay.



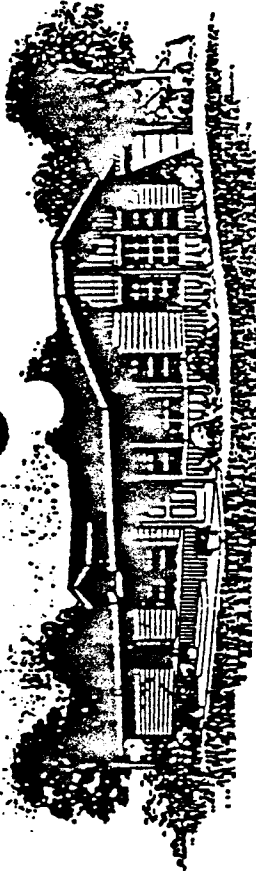
If an exit door swings outward in the direction of exit travel a landing must be provided. The landing surface may not be more than 1 inch below the bottom of the door. The landing width and length size must not be less than the door width.

If an exit door swings inward or is a sliding glass door, a landing is not required. The top step (or landing when provided) may not be more than 7 1/2 inches below the bottom of the door.

Handwritten notes in red ink:
 Treated lum bers base
 Concrete base
 Stair riser
 Stair stringer
 Stair nosing
 Stair treads
 Stair balusters
 Stair handrail
 Stair nosing
 Stair treads
 Stair balusters
 Stair handrail
 Stair nosing
 Stair treads
 Stair balusters
 Stair handrail

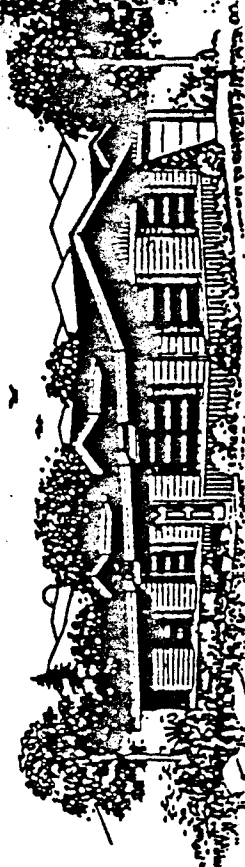
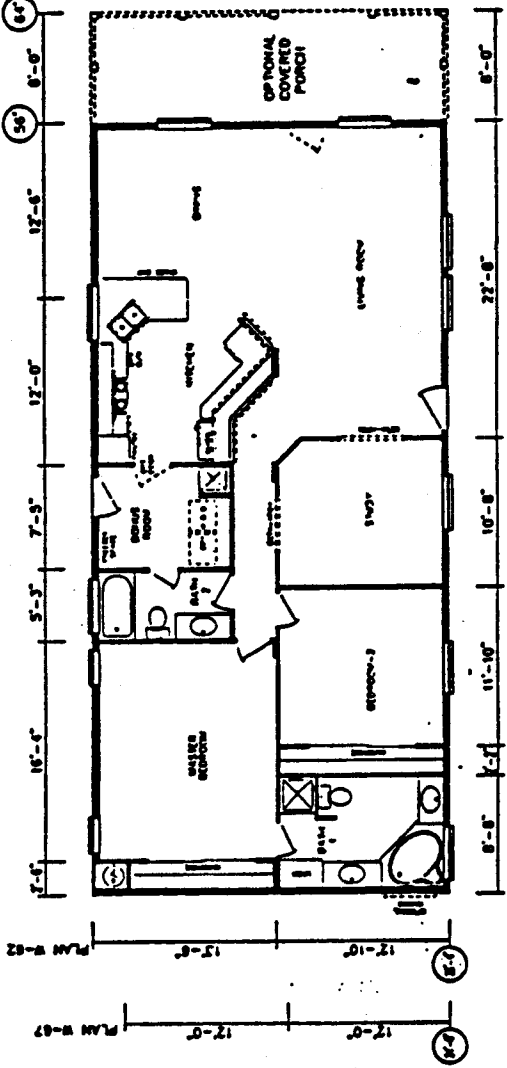
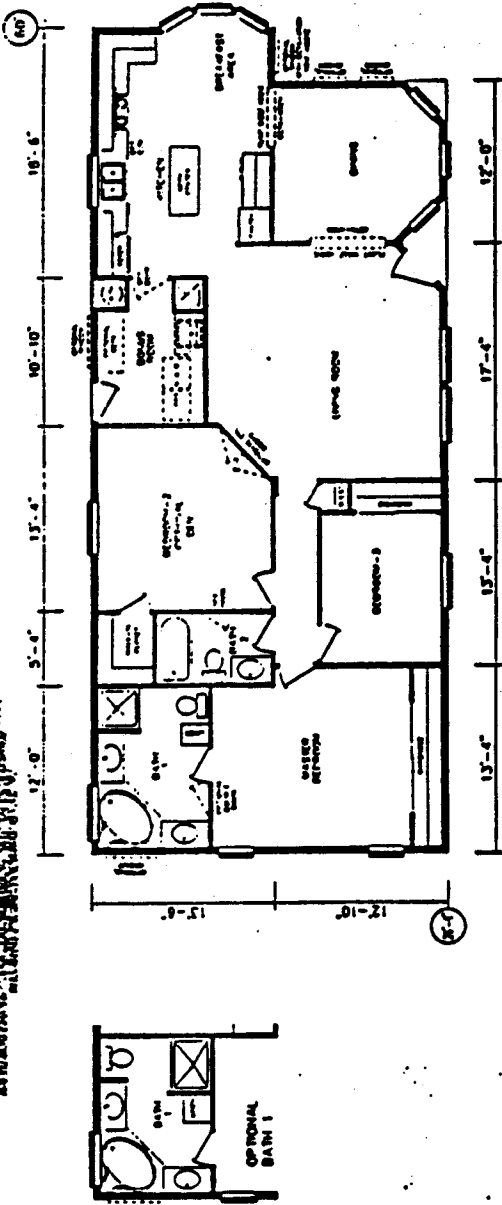
NOTE: The illustrations and descriptions herein are simplified for clarity. Refer to the California Code of Regulations, Title 25, Chapter 2, for the specific codes governing mobilehome/manufactured home stair construction.

Typical Mobile Home Installation Per Code



Plan W-60

Three Bedrooms, Two Bathrooms
Approx. 1537 sq. ft.



Plan W-62 and W-67

Two Bedrooms, Two Bathrooms
W-62 Approx. 1474 sq. ft. Without Optional Porch
W-62 Approx. 1685 sq. ft. With Optional Porch
W-67 Approx. 1711 sq. ft. Without Optional Porch
W-67 Approx. 1922 sq. ft. With Optional Porch

5-00-114

SALES

RECEIVED
MAY 12 2000
CALIFORNIA
COASTAL COMMISSION

State of California
Department of Parks and Recreation
NOTICE OF EXEMPTION

TO: Office of Planning and Research
1400 Tenth Street, Room 222
P.O. Box 3044
Sacramento, CA 95812-3044

FROM: Department of Parks and Recreation
1416 Ninth Street
P.O. Box 942896
Sacramento, CA 94296-0001

5-00-174

PROJECT TITLE: Manager's New Mobile Home (99/00-OC-17)

LOCATION: Crystal Cove State Park

CITY: COUNTY: Orange

DESCRIPTION OF THE PROJECT:

Project consists of the installation of a new one-story mobile home for the manager of El Morro Beach Mobile Home Park at Crystal Cove SP. The existing laundry room will be demolished and the existing utility lines will need to be moved 5 feet over. An archaeologist will insure avoidance of significant impacts to cultural remains. No potential for significant impacts to the environment is anticipated.

PUBLIC AGENCY APPROVING THE PROJECT: Department of Parks and Recreation

NAME OF DIVISION CARRYING OUT THE PROJECT: Park Stewardship: Orange Coast District

EXEMPT STATUS:

Ministerial (Section 15268)
 Declared Emergency (Section 15269(a))
 Emergency Project (Section 15269(b) and (c))
 Statutory Exemption (Section:)
 X Categorical Exemption
Class: 3 Section: 15303

CONTACT: Maria Mealey, Environmental Coordinator

TELEPHONE: (619) 220-5329


District Superintendent

EXHIBIT No. 4
Project Number: 5-00-174
State Dept. of Parks & Rec. Project Approvals
California Coastal Commission

STATE OF CALIFORNIA
THE RESOURCES AGENCY
DEPARTMENT OF PARKS AND RECREATION
ORANGE COAST DISTRICT
California Environmental Quality Act
Project Evaluation

Project Title Manager New Mobile Home Unit and Sub-unit Crystal Cove SP
 District Crystal Cove State Park Prepared By JACK DeCamp
 Funding Source MHP OWNER Funded Amount As Required Phone 949-494-7581
 Date Prepared 11-19-99 Start Date ASAP Completion Date Upon Approval

I PROJECT DESCRIPTION. Describe the project including its purpose, location, potential impacts and benefits. If ground is to be disturbed describe the depth and extent of excavation. Describe the existing site conditions including soil type, vegetation, and if site has been previously disturbed by development. Attach a location map (7.5 minute quad) and a site map. Continue Project Description on Page 3, and attach additional sheets if necessary.

Installation of new mobile home for Manager of El Morro Beach Mobile Home park. Requires demolition of existing Laundry Room. New home will make use of existing utilities, but utilities will need to be moved 5' by digging new trench.
 Installation will be per title 25 of the California Civil Code, Manufacturer requirements and the California Mobile Home Residency Law.
 This home installation does not require any subterranean foundation. Home sets on wood + concrete preformed blocks at surface of ground.

* Floor Plan Attached (Doc. A) * typical Home Installation Diagram (Doc. B)
 * Lot Plan Attached (Doc. C)

II REGULATORY REQUIREMENTS	YES	MAYBE	NO
A. Coastal Development Permit	---	---	X
B. DFG Stream Alteration Permit	---	---	X
C. DFG Endangered Species Consultation	---	---	X
D. COE 404 Permit or Wetlands Determination	---	---	X
E. DFR Right to Enter Permit or Temporary Use Permit	---	---	X
F. Historic Structure Review (PRC. 5024)	---	---	X
G. Americans with Disabilities Act	---	---	X
H. Other	---	---	X

III DFR POLICY COMPLIANCE

	YES	MAYBE	NO
A. Has a General Plan been approved for the unit?	---	---	X
1. If yes, is this project consistent with GP?	---	---	---
2. If no, project justification:			
a. Temporary facility/No permanent resource commitment?	---	---	X
b. Health and Safety?	---	---	X
c. Resource Management?	---	---	X
d. Repair, replace or rehab existing facility?	---	---	---
B. Is project consistent with Resource Mgmt Directives?	---	---	---
C. Is the project within a classified subunit?	---	---	X
1. Natural Preserve?	---	---	X
2. Cultural Preserve?	---	---	X
3. State Wilderness?	---	---	X

IV PUBLIC INTEREST

A. Does this project have the potential for significant public concern or controversy?	---	---	X
--	-----	-----	---

V NATURAL RESOURCES

A. EARTH. Will this project:			
1. Create unstable soil or geologic conditions?	---	---	X
2. Change topographic features?	---	---	X
3. Affect any unusual geologic or soil features?	---	---	X
4. Increase wind or water erosion?	---	---	X
5. Affect sand deposition or erosion of a beach?	---	---	X
6. Expose people or property to geologic hazards?	---	---	X
7. Affect physical or chemical properties of soil?	---	---	X
8. Expose people or property to hazardous waste?	---	---	X
B. AIR. Will the project affect air quality or climate?	---	---	X
C. WATER. Will the project:			
1. Change water movement in marine or fresh waters?	---	---	X
2. Change drainage or runoff patterns?	---	---	X
3. Affect quantity or quality of surface waters?	---	---	X
4. Affect quantity or quality of groundwater?	---	---	X
5. Expose people or property to flood hazards?	---	---	X
6. Change sediment transportation rates?	---	---	X
D. PLANT LIFE. Will the project:			
1. Affect a native or naturalized plant community?	---	---	X
2. Affect unique, rare or endangered plant species?	---	---	X
3. Introduce a new species of plants to the area?	---	---	X
4. Affect vigor or structure of any tree?	---	---	X
5. Affect agricultural production?	---	---	X

- E. ANIMAL LIFE. Will the project:
- | | <u>YES</u> | <u>MAYBE</u> | <u>NO</u> |
|---|------------|--------------|-------------------------------------|
| 1. Affect native or naturalized animal populations? | --- | --- | <input checked="" type="checkbox"/> |
| 2. Affect unusual, rare or endangered species? | --- | --- | <input checked="" type="checkbox"/> |
| 3. Affect animal life habitat? | --- | --- | <input checked="" type="checkbox"/> |

- VI CULTURAL RESOURCES. Will the project:
- | | | | |
|---|-----|-----|-------------------------------------|
| A. Affect a prehistoric or historic archeological site? | --- | --- | <input checked="" type="checkbox"/> |
| B. Affect a historic building, structure, or object? | --- | --- | <input checked="" type="checkbox"/> |
| C. Diminish the significance of the resource? | --- | --- | <input checked="" type="checkbox"/> |

- VII ESTHETIC RESOURCES. Will the project:
- | | | | |
|--------------------------------------|-----|-----|-------------------------------------|
| A. Increase existing noise levels? | --- | --- | <input checked="" type="checkbox"/> |
| B. Affect a scenic vista or view? | --- | --- | <input checked="" type="checkbox"/> |
| C. Create a visually offensive site? | --- | --- | <input checked="" type="checkbox"/> |

- VIII RECREATIONAL RESOURCES. Will the project:
- | | | | |
|---|-----|-----|-------------------------------------|
| A. Affect the quality or quantity of existing recreational opportunities or facilities? | --- | --- | <input checked="" type="checkbox"/> |
|---|-----|-----|-------------------------------------|

IX COMMENTS. Provide additional detail for all yes or maybe responses, and explain all "no" answers that might reasonably be questioned.

No Garage. Standard 2 car-car port to be installed over existing Asphalt patio deck consists of Redwood construction on blocks + gaskets at surface of ground.

Project Title Migrs New Mobil Home Unit Crystal Cove Date 12-2-99

Conceptual Approval: YES NO
District Superintendent Donald A. [Signature] for Mike Tope Date 12/2/99
Comments:

Archeologist Ray E. [Signature] Date 12/15/99
Comments: the proposed sub-surface disturbance associated with project construction activities should be monitored by a cultural resource specialist from the SSC. Utility emplacement, foundation excavation, and any other ground-disturbing activities need on-site monitoring. NOTE: ORA-280 is immediately adjacent

Historian A. Clausen Date 1/19/00
Comments: No historic structures or features in project area.

Resource Ecologist [Signature] Date 12-2-99
Comments: No poured cement allowed. Structure on blocks/jacks. Trenching ^{5 FEET} in ORA 280 will need Archaeo monitor. No other resource concerns.

Resource Specialist [Signature] Date 1-18/2000
Comments: Project is categorically exempt Class 3, Section 15303

Other (Landscape Architect, Land Agent, Civil Engineer) _____ Date _____
Comments:

DETERMINATION
 The project is categorically exempt A Notice of Exemption should be filed
 A Negative Declaration should be prepared An Environmental Impact Report should be prepared

Approved; OK to start work immediately Special Review Not Approved
 Recommend approval; start work when Notice of Exemption or Determination received

DISTRICT SUPERINTENDENT or Service Center Manager [Signature] Date 1/22/00
Comments:

California Department of Parks and Recreation
Historic Facility and Archaeological Site
Project Evaluation (P.R.C. 5024, 5024.5)

PROJECT: Manager's New Mobile Home
PARK UNIT: Crystal Cove State Park
Project Manager: Mike Tope
Date: 12/16/99

Orange Coast
DISTRICT: Angeles-District, Malibu

Contact Phone #: FAX #:

BRIEF PROJECT DESCRIPTION: Install Mobile Home for manager of El Morro Beach Mobile Home Park at Crystal Cove S.P.
Concrete pad and piers and perimeter concrete foundation to be poured.

Source of Funding/Amount: El Morro Investment/as required

CULTURAL RESOURCES: HISTORIC ARCHAEOLOGICAL BOTH

I. INVENTORY STATUS Attach appropriate documentation:

- A. Is the Resource recorded?: Yes No DPR 750 or 523 on file?: Yes No
DPR 422 on file?: Yes No
- B. Listing or Eligibility: California Register: Yes No National Register: Yes No
- C. Resource is: Individual Structure Archaeological Site(s)
Historic District Archaeological District
National Historic Landmark Cultural Preserve
- D. Resource Description: Prehistoric Archaeological Site Ca-ORA-280

II. DPR POLICY COMPLIANCE

- A. Is project consistent with General Plan?: Yes No GP date:
 - B. If no General Plan, is project scope consistent with current resource use?: Yes No
 - C. Is project consistent with Resource Management Directives?: Yes No
- Comments:

III. IMPACT ASSESSMENT

- A. Historic Facility. Will this project:
- Affect Exterior Affect Interior
 - Remove or Damage Historic Fabric
 - Replace Historic Fabric in kind Replace Missing Historic Fabric
 - Add Non-Historic Elements to Historic Structure
 - Alter Historic Terrain, Ground Cover, or Vegetation
 - Reintroduce Historic Element to Setting
 - Remove Non-historic Elements from Setting
 - Demolish Historic Structure Result in Transfer of Historic Facility

Historic Facility Name:
Comments:

- B. Archaeological Site. Will this project:
- Result in Grading, Trenching, or Building on a Known Site
 - Place Fill, Foundations, or Facilities on a Known Site
 - Remove Protective Vegetation within a Site Area
 - Revegetate Archaeological Site Area
 - Expose Artifacts, Features, or Deposits to Vandalism or Public Use
 - Be carried out in an area known to contain Human Remains

Site Number: CA-ORA-280
Archaeological Site Type: Historic Prehistoric Unknown
Are Site Boundaries and Depth known?: Yes No

Comments: Subsurface extent (areally) is untested. Installation of the trailer park may have removed significant portions of CA-ORA-280. However, due to the possibility of encountering intact prehistoric cultural resource deposits during trenching activities associated with utilities emplacement, etc., excavation, or ground-disturbing activity of any kind, prehistoric cultural resources could be impacted. A cultural resources specialist should be on site when construction occurs. If cultural resource deposits (associated

with ORA 280) are encountered during construction activities, the archaeologist will halt excavation and evaluate the finds. In this case the proposed development should then be modified to best protect any cultural remains encountered.

C. Is proposed project consistent with Secretary of Interior Standards and Guidelines?: Yes No

Explain:

D. Would project redesign lessen resource impacts?: Yes No

Explain:

E. Are appropriate mitigation measures included within project scope?: Yes No

Explain:

F. Do mitigation measures involve salvaging historic fabric or excavating archaeological deposits?:

Yes No

Explain:

IV. DETERMINATION

A. Proposed Project will have:

No Effect

No Adverse Effect

Adverse Effect

on the Historical or Archaeological Resources of the State Park System.

B. Project should proceed with the following modifications or special provisions (Identify specific mitigation measures):

Please see section III. B. "Comments"

C. Additional Documentation required for Determination of Effect?: Yes No

Explain:

D. Was a Secondary Review carried out by a Cultural Resource Specialist?: Yes No

V. APPROVAL AND CERTIFICATION

I recommend this project be Approved Not Approved Approved Conditionally
Explain:

Primary Reviewer: *[Signature]* Date: 1-12-00

Title: Associate State Archaeologist Phone #: (619)220-5306

Hours Spent on Evaluation: 3

Secondary Reviewer:

Title: Phone #:

Project Manager:

I understand that this project as proposed or modified may affect historical or archaeological resources. I will insure that all mitigation measures necessary for the project to conform with Historic Preservation standards will be carried out as specified above.

[Signature]

Project Manager:

Title: *Park Manager* Phone #:

Date: *2-8-00* FAX #:

Note: All review packages must include a project map and appropriate documentation. For archaeological surveys, attach DPR 649 (or equivalent) with coverage map and site records. For historic structures, attach DPR 750.



State of California - The Resources Agency

DEPARTMENT OF PARKS AND RECREATION

Orange Coast District
3030 Avenida del Presidente
San Clemente, California 92672
(949) 492-0802

Gray Davis, Governor

Rusty Aréias, Director

July 12, 2000

Ann L. Kramer, Coastal Program Analyst
California Coastal Commission
200 OceanGate, 10th Floor
Long Beach, California 90802-4416

Dear Ms. Kramer:

Thank you for providing me with a copy of the Coastal Development Permit application submitted by El Morro Village, Inc. for the installation of a mobile home near the northwest corner of the trailer park.

As you are aware, the site encumbers a portion of an archeological site which we are mandated to manage and protect. To that end, we require the following provisions be incorporated into the Coastal Development Permit and be implemented in the order as listed:

- Placement of filter fabric across the entire project site.
- Place culturally sterile fill material over the site at a depth of 1 to 1.5 feet.
- Provide for the gradual change in grade between the fill material and the existing park road so that retaining walls or other harden structures are unnecessary.
- Site drainage should flow towards the east or the park road area.
- Eliminate any paving, planters or any other harden structures from the project description.

While we have notified the El Morro Village management that any additional excavation of the site is unauthorized, we request the Coastal Development Permit include this restriction. This requirement should include no ground disturbance associated with landscaping, irrigation, trailer support structures and utilities. Furthermore, the site development should not cause any erosion to adjacent lands.

EXHIBIT No.

Project Number:

5-00-174

Letter from State Dept. of
Parks and Recreation California Coastal
Commission

Ms. Ann Kramer – Manager's Trailer CDP
July 12, 2000
Page 2

Thank you for incorporating these provisions into the Coastal Development Permit. Please call me if you have any questions.

Sincerely,



Richard Rozzelle
Associate Park and Recreation Specialist

Cc: Jack DeCamp, El Morro Village
Michael Sampson, DPR



Chambers Group

Environmental Services
Biological Resources
Cultural Resources

April 28, 2000
(5259)

Mr. Jack DeCamp
Newport Pacific Capital
c/o El Morro Village
8811 North Coast Highway
Laguna Beach, CA 92651

Subject: Archaeological Reconnaissance of Two Localities at the El Morro Village Mobile Home Park, Laguna Beach

Dear Mr. DeCamp:

I conducted an archaeological survey of the area adjacent to the El Morro School fence referred to as Laundry Room/Manager's Mobil Home Pad (Site #3) and the Overflow Lot/Bluff Face (Site #1) on the afternoon of April 14th 2000, as specified in an April 12th letter request by Mr. Mike Tope, Superintendent, Orange County District of the Department of Parks and Recreation for the State of California to Mr. Michael J. Sullivan, CEO, Newport Pacific Capital Company, Inc.

The first area in question is referred to as Site #3 in the April 12th letter, and is the subject of discussion relating to work conducted to demolish a laundry room per the Department of Parks and Recreation District, California Environmental Quality Act (CEQA) Project Evaluation #99/00-OC-17. CEQA #99/00-OC-17 has a project Determination of No Adverse Effect with No Additional Documentation Required. Installation is per title 25 of the California Civil Code, Manufacturer Requirements and the California Mobil Home Residences Law. Further, it is listed as categorically exempt per Class 3, Section 15303. The permit stipulates that a new structure to be built on the demolition site be constructed at surface of the ground without subterranean foundations. It further states that, "trenching 5 feet in ORA 280 will need Archaeo monitor. No other resource concerns."

The other area inspected was Site #1 where tailings and dumped material had been removed at the base of the bluff which forms one boundary of a parking area.

Mr. Jack DeCamp, Manager of the El Morro Beach Mobile Home Park, showed me the site locations and provided me with maps and photographs of the area from his files.

Results


Site #3

The area in question had been the subject of grading during the mobile

Corporate Headquarters
17671 Cowan Avenue, Suite 100
Irvine, CA 92614
(949) 261-5414
Fax: (949) 261-8950

Inland Empire
302 Brookside Avenue, Suite D
Redlands, CA 92373
(909) 335-7068
Fax: (909) 335-6318

A Certified Disabled

EXHIBIT No. <i>62</i>
Project Number: 5-00-174
Letter from Archaeologist with Chambers Group
 California Coastal Commission

construction, according to the grading plan dated July, 1969 (Donald E. Stevens, Civil Engineer, Field Book 14-8,16) and accompanying photographs taken during construction that year. The chainlink fence presently bordering the property indicates the extent of construction.

The location was partly covered by asphalt; some had been recently removed and some was covered by a few inches of soil. Some leveling had evidently occurred, during which an area approximately 8 meters long and 35 centimeters maximum depth had been cut at the base of the fence facing toward the El Morro School. This portion of fence runs 50 feet east-west along the edge of the steep slope leading to the School below. The extent of the grading is less than 3 meters wide as evidenced by the remaining asphalt, and the cut shallows to daylight within this 3 meters. Approximately 4.2 cubic meters of soil has therefore been recently leveled.

Observation of the profile of the 35-centimeter cut face indicated that the upper 19 - 23 centimeters on the west side consisted of organic buildup at the base of the fence. The upper ten centimeters on the east side of the cut was disturbed and/or fill. Therefore, approximately one-half of the recently leveled soil was not originally *in situ*. Examination of the upper portion of the profile exposed small fragments of marine shell in the soil matrix. The sharply fragmented condition of the shell indicates that it had been transported to its present location. Examination of the lower, *in situ*, portion of the profile exposed only one partial shell fragment approximately the size of a fifty-cent piece.

No significant damage appears to have resulted to cultural resources from recent demolition activities.

Site #1

Photographs taken during early development of the site at least forty years previously show the toe of the bluff freshly cut to vertical as it appears today. The exposed cut is in competent sediments of Later Tertiary siltstone marine origin. No recent damage/destabilization of the bluff is indicated and no potential damage to the cultural resources on the top of the bluffs is apparent from recent or previous activity at the site.

If you have any questions, please call me at (949) 261-5414.

Sincerely,

CHAMBERS GROUP, INC.

Roger D Mason for

Judy McKeehan, M.A., RPA
Senior Archaeologist

