

**CALIFORNIA COASTAL COMMISSION**

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Staff:	Robert S. Merrill
Staff Report:	April 29, 2005
Hearing Date:	May 13, 2005
Commission Action:	

**STAFF REPORT: REGULAR CALENDAR****APPLICATION NO.:****1-02-156****APPLICANTS:****CALIFORNIA DEPARTMENT OF  
PARKS & RECREATION****PROJECT LOCATION:**At Gold's Bluff Beach Campground, Prairie  
Creek Redwoods State Park, northern  
Humboldt County (APN 519-011-012)**PROJECT DESCRIPTION:**Replace the existing campground  
combination restroom and outdoor shower  
facility with a new 405-square-foot building  
containing four indoor showers and four  
indoor restrooms, a total of approximately  
640 square feet of walkways including a  
paved ADA accessible walkway around the  
perimeter of the building and a crushed  
shale walkway from the parking lot to the  
restroom, and a new 5,000-gallon buried  
septic tank served by an approximately

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4,920-square-foot leach field.

LAND USE PLAN DESIGNATION : Public Lands (P)

ZONING DESIGNATION: Public Recreation (PR)

LOCAL APPROVALS REQUIRED: Humboldt County Division of Environmental Health septic system permit

OTHER APPROVALS REQUIRED: None

SUBSTANTIVE FILE DOCUMENTS: Humboldt County Local Coastal Program

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**SUMMARY OF STAFF RECOMMENDATION:**

Staff recommends that the Commission approve with conditions the coastal development permit application.

The California Department of Parks and Recreation (Department) proposes to replace the existing restroom/shower facility at the Gold Bluffs Beach Campground at Prairie Creek Redwoods State Park in northern Humboldt County. The Gold Bluffs Beach area consists of a coastal dune ecosystem that stretches approximately 8 miles along the coast at the base of a coastal bluff. Virtually all of this area except for those portions of the area already developed with roads, parking areas, and structures is considered to be part of an environmentally sensitive habitat area (ESHA).

The deteriorating restroom/shower facility to be replaced is undersized, presents ongoing maintenance and pollution problems, does not meet ADA requirements, and is connected to a septic pit that was constructed prior to the need for permits and which does not meet current North Coast Regional Water Quality Control Board (RWQCB) standards. The facility is subject to raw sewage overflows and includes an outdoor shower that discharges into the ground and also does not meet RWQCB standards. The Department proposes to replace the restroom/shower facility with a new facility to be built in the same location. However, the new facility must meet current ADA requirements and the new septic disposal system must meet current North Coast Regional Water Quality Control Board (RWQCB) and Humboldt County Division of Environmental Health standards. As a result, even though the facility would be designed to serve the same number of users as the existing facility, the space occupied by the new facility would need to be larger. The building footprint of the new structure would be larger to accommodate a paved perimeter walkway needed to meet ADA standards. The buried

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septic tank and leach field would occupy a larger area of the dunes than the old septic tank and pit toilet. As the entire area except for those portions of the ground covered by the existing buildings, roads, and parking area are considered ESHA, the proposed new facility would encroach into ESHA, inconsistent with Section 30240 of the Coastal Act which requires, among other things, that only uses dependent on the resources of the ESHA shall be allowed within an ESHA.

However, staff believes that no feasible alternative exists. Since virtually all of the surrounding area is comprised of ESHA, there are no feasible alternative locations that would avoid encroachment into the ESHA or even reduce the amount of encroachment into ESHA within the project site. Alternative septic and leach field designs that might occupy a smaller area are dependent on the availability of electrical power to operate pumps, recirculating and treatment devices, and other necessary equipment. The remote Gold Bluffs Beach area is not served by any electrical service, rendering these alternative septic and leach field designs infeasible. The no project alternative would eventually require closure of the existing deteriorated facility, which would eliminate the only toilet facility within 1.5 miles and the only plumbed restroom facility within four miles.

To not approve the project would result in impacts to water quality and public health that would be inconsistent with the mandates of Section 30231 of the Coastal Act to maintain and restore coastal water quality. With the eventual closure of the restroom, campground users and visitors would be forced to rely on other measures, resulting in unacceptable surface and groundwater degradation. Prior to the actual closure of the facility, the restroom would continue to be subjected to major raw sewage overflows and restroom closures which occur on average, three to five times a summer. Less serious overflows from backed-up toilets would continue to occur on average of another three to four times a week. In addition, holes chewed in the existing underground pipes by rodents would continue to result in additional major raw sewage overflows approximately five times per summer.

Therefore, staff believes the proposed project presents a true conflict between Sections 30240 and Section 30231 of the Coastal Act and it is appropriate for the Commission to invoke the conflict resolution policies of Section 30007.5 of the Coastal Act. This section states that when the Commission identifies a conflict among the policies in Chapter 3, such conflicts are to be resolved in a manner which on balance is the most protective of significant coastal resources. Staff believes that the impacts on coastal resources from not constructing the project would be more significant than the project's dune habitat impacts. Denying the project because of its inconsistency with Section 30240 would avoid a net increase of dune displacement of approximately 653 square feet for the above ground portion of the development. In addition, the new septic system would increase encroachment into the dunes by approximately 5,000 square feet over the area currently affected by the existing failing septic system. This impact on dune habitat would be partially mitigated by the applicant's proposal to restore the area above the new

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septic tank and leach field by reestablishing existing contours and replanting affected areas with dune vegetation. On the other hand, approving the development of the replacement restroom/shower facility would eliminate the water quality and habitat degradation affects referred to above. In staff's opinion, the improvements to water quality and the elimination of avoidance of contamination of the area from raw sewage would be more protective of coastal resources than the impacts on dune habitat from the somewhat greater encroachment of the new restroom/shower facility into dune habitat than the existing facility.

To ensure that the water quality benefits of the project that would enable the Commission to use the balancing provision of Section 3007.5 are achieved, the staff recommends Special Condition No.7 which requires that the septic system be maintained in accordance with applicable standards. Special Condition Nos.5 and 8 would require that in the event the restroom/shower facility is proposed to be converted to another use, a permit amendment shall be obtained from the Commission and any amendment granted may include a requirement that the development authorized by this permit be removed in its entirety and the site restored to dune habitat. To ensure that the impacts to dune habitat are minimized, Special Condition No. 4 requires the submittal of a revegetation plan that includes monitoring and remediation provisions to ensure that dune areas disturbed during construction are revegetated. Special Condition No. 6 would protect visual resources by imposing limits on building colors and materials. Other recommended special conditions would minimize the impacts of construction, including Special Condition No. 1 which requires the submittal of an erosion and sedimentation control plan, Special Condition No. 2 which requires the submittal of a hazardous materials management plan to minimize the potential impacts of spills of construction equipment fuels and lubricants, and Special Condition No. 3 which requires the submittal of a debris disposal plan to ensure that construction debris is disposed in an appropriate location.

Therefore, staff believes that as conditioned, the proposed development is consistent with the Coastal Act.

**The Motion to adopt the Staff Recommendation of Approval with Conditions is found on page 5.**

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## **STAFF NOTES:**

### **1. Jurisdiction and Standard of Review**

The project site is within the Commission's retained jurisdiction where there are areas subject to the public trust. Therefore the applicable standard of review for Coastal

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Development Permit application No. 1-02-156 is the Chapter 3 policies of the Coastal Act.

## 2. Commission Action Necessary

The commission must act on the application at the May 13, 2005 meeting to meet the requirements of the Permit Streamlining Act.

## 3. Addendum

This staff report does not contain certain findings for approval of the project, including the findings related to invoking the conflict resolution provision of the Coastal Act discussed in the Summary of the Staff Recommendation above. Staff was unable to complete the findings prior to the mailing of the staff report. However, staff will present the recommended findings for approval of the project as part of an addendum at the Commission meeting. The findings will reflect the basis for approval with conditions discussed in the Summary of the Staff Recommendation.

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## I. MOTION, STAFF RECOMMENDATION AND RESOLUTION:

The staff recommends that the Commission adopt the following resolution:

### Motion:

I move that the Commission approve Coastal Development Permit No. 1-02-156 pursuant to the staff recommendation.

## STAFF RECOMMENDATION OF APPROVAL:

Staff recommends a YES vote. Passage of this motion will result in approval of the permit as conditioned and adoption of the following resolution and findings. The motion passes only by affirmative vote of a majority of the Commissioners present.

## RESOLUTION TO APPROVE THE PERMIT:

The Commission hereby approves a coastal development permit for the proposed development and adopts the findings set forth below on grounds that the development as

conditioned will be in conformity with the policies of Chapter 3 of the Coastal Act. Approval of the permit complies with the California Environmental Quality Act because feasible mitigation measures and/or alternatives have been incorporated to substantially lessen any significant adverse effects of the development on the environment.

II. **STANDARD CONDITIONS:** See Attachment A.

III. **SPECIAL CONDITIONS:**

1. **Erosion and Sedimentation Control Plan**

A. **PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT,** the applicant shall submit for review and approval of the Executive Director, a plan for erosion and sedimentation control.

- (1) The erosion control plan shall demonstrate that:
  - (a) During construction, erosion on the site shall be controlled to avoid adverse impacts on adjacent dune habitat and wetlands;
  - (b) Temporary erosion control measures shall be implemented during construction including, but not limited to: confining earthwork activities to the non-rainy season; preserving existing vegetation surrounding the construction areas as much as possible; installing debris barriers such as silt fences, or fiber rolls, or weed free rice straw barriers on the down slope side of the construction areas and maintaining these barriers in place throughout the construction period; stabilization and containment of stockpiles; and replanting or seeding any disturbed areas with native vegetation following project completion.
- (2) The plan shall include, at a minimum, the following components:
  - (a) A narrative report describing all temporary runoff and erosion control measures to be used during construction;
  - (b) A site plan showing the location of all temporary erosion control measures; and
  - (c) A schedule for installation and removal of the temporary erosion control measures.

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

**2. Hazardous Materials Management Plan**

- A. **PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT,** the applicant shall submit, for the review and written approval of the Executive Director, a plan to reduce impacts to water quality from the use and management of hazardous materials on the site. The plan shall be prepared by a licensed engineer with experience in hazardous material management.

1. The plan, at a minimum, shall provide for the following:
  - (a) Equipment fueling shall occur only during daylight hours in designated fueling areas;
  - (b) Oil absorbent booms and/or pads shall be on site at all times during project construction. All equipment used during construction shall be free of oil and fuel leaks at all times;
  - (c) Provisions for preparing and pouring cement in a manner that will prevent discharges of wet cement into wetlands including, but not limited to, placement of measures such as catch basins, mats or tarps beneath the construction area to prevent spills or over-pours from entering coastal waters;
  - (d) Provisions for the handling, cleanup and disposal of any hazardous or non-hazardous materials used during the construction project including, but not limited to, paint, asphalt, cement, equipment fuel and oil, and contaminated sediments;
  - (e) A schedule for maintenance of containment measures on a regular basis throughout the duration of the project;
  - (f) Provisions for the containment of rinsate from the cleaning of equipment, including cement mixing equipment, and methods and locations for disposal off- site. Containment and handling shall be

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in upland areas and otherwise outside of any environmentally sensitive habitat area;

- (g) A site map detailing the location(s) for hazardous material storage, equipment fueling and maintenance, and concrete wash-out facilities; and
- (h) Reporting protocols to the appropriate public and emergency services agencies in the event of a spill.

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

3. **Debris Disposal Plan**

A. **PRIOR TO ISSUANCE OF THE PERMIT**, the applicant shall submit, for the review and approval of the Executive Director, a debris disposal plan for the disposal of construction-related debris and excavated material.

- (1) The debris disposal plan shall demonstrate that:
  - (a) No debris or excavated material to be removed shall be temporarily placed or stored during grading activities where it may be subject to entering coastal dune habitat or wetlands; and
  - (b) All of the debris or excavated material to be removed shall be disposed of at an authorized disposal site capable of receiving such materials; and
- (2) The plan shall include, at a minimum, the following components:
  - (a) A site plan showing all proposed locations for stockpiling construction materials, debris, and excavated material during construction;
  - (b) A description of the manner by which the material will be removed from the construction site and identification of all debris disposal sites that will be used; and
  - (c) A schedule for removal of all debris and excavated material.



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

4. **Revegetation Plan**

- A. **PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT**, the applicant shall submit, for review and written approval of the Executive Director, a final revegetation plan for replanting areas disturbed by construction with native vegetation.

1. The plan shall demonstrate that:

- (a) only native and/or non-invasive plant species shall be planted. No invasive exotic plant species shall be planted;
- (b) the replanting program will achieve 75% native species coverage within five years of the start of construction as proposed in the application;
- (c) Annual monitoring would occur over the five year period;
- (d) all planting will be completed within 60 days of completion of construction;
- (e) the required plantings will be maintained in good growing conditions through-out the life of the project, and replaced if necessary; and

2. The plan shall include, at a minimum, the following components:

- (a) a plant list;
- (b) a map drawn to scale showing the type, size, and location of all plant materials that will be planted, the topography of the area to be planted, the location of the planted area in relation to property boundaries, roads, and all other major features of the property,

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- (c) a description of plant establishment techniques to be used for planting the vegetation (e.g., depth of planting hole, irrigation, fertilization, etc.);
    - (d) provisions for monitoring and remediation of the entire planting area in accordance with the approved final revegetation plan for a period of five years after planting of the vegetation that includes the submittal for the review and approval of the Executive Director of annual monitoring reports prepared in conjunction with a qualified professional by September 30 of each year. The annual monitoring reports must evaluate whether the planting area conforms with the goals, objectives, and performance standards set forth in the approved final revegetation plan. If the final report indicates that the planting effort has been unsuccessful, in part, or in whole, based on the approved performance standards, the applicant shall submit a revised or supplemental planting plan to compensate for those portions of the original plan which did not meet the approved performance standards. The revised planting program shall be processed as an amendment to this coastal development permit; and
    - (e) a schedule for installation of plants.
  - B. The permittee shall undertake development in accordance with the approved final plan. Any proposed changes to the approved final plan shall be reported to the Executive Director. No changes to the approved final plan shall occur without a Commission amendment to this coastal development permit unless the Executive Director determines that no amendment is legally required.
- 5. Limitation on Development and Use of Restroom/Shower Facility Authorized by Permit No. 1-02-156**
- A. Development and use of the development authorized by Permit No. 1-02-156 shall solely be limited to a restroom/shower facility serving the Gold Bluff's Beach Campground.
  - B. If use of the development is proposed to be changed, or if the restroom/shower facility is proposed to be converted to another use, a permit amendment shall be obtained from the Commission approving and proposed change or conversion. By accepting this permit, the applicant acknowledges and agrees that any amendment granted by the Commission may require that the development authorized by Coastal Development Permit No. 1-02-156 shall be removed in its entirety and the site restored to dune habitat.

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- C. **PRIOR TO ISSUANCE OF COASTAL DEVELOPMENT PERMIT NO. 1-02-156**, the applicant shall submit: (1) a written agreement by the California Department of Parks and Recreation in a form and content acceptable to the Executive Director, providing that it shall include a provision in any subsequent lease or assignment of such property requiring the lessee or assignee to submit a written agreement to the Commission, for the review and approval of the Executive Director, incorporating all of the terms of subsections A and B of this condition; and (2) a written agreement by the Department, in a form and content acceptable to the Executive Director, incorporating all of the above terms of subsection A, B, and C of this condition.

## 6. **Design Restrictions**

- A. All exterior siding, trim, and roofing of the proposed combination restroom/shower building shall be composed of materials of dark earth tone colors only. The permittee shall not repaint or stain the structure with products that will lighten the color of the facility as approved. In addition, all exterior materials, including roofs and windows, shall be non-reflective to minimize glare; and
- B. All exterior lights, including any lights attached to the outside of the buildings, shall be the minimum necessary for the safe ingress and egress of the structures, and shall be low-wattage, non-reflective, shielded, and have a directional cast downward such that no light will shine beyond the approved building and walkways.

## 7. **Maintenance of Replacement Septic System**

The permittee shall properly maintain all components of the replacement septic system over the life of the project in accordance with any applicable standards of (a) the manufacturer of septic system components, (b) the Humboldt County Division of Environmental Health, and (c) the North Coast Regional Water Quality Control Board.

## 8. **Permit Amendment**

All development must occur in strict compliance with the proposal as set forth in the application for the permit as modified by the special conditions. Any deviation from the plan proposal shall require an amendment to this permit, unless the Executive Director determines that no amendment is legally required.

**IV. FINDINGS AND DECLARATIONS:**

The Commission hereby finds and declares:

**A. Site Description**

The project site is located at the Gold Bluff Beach Campground, about 1.5 miles north of the Gold Bluffs entrance station off of Davidson Road, approximately six miles from the intersection of Davidson Road and Highway 101 in Prairie Creek Redwoods State Park, in Humboldt County. The park is located about 50 miles north of Eureka and 25 miles south of Crescent City.

Prairie Creek Redwoods State park comprises approximately 14,000 acres of primarily old growth coast redwood forest, including Fern Canyon, prairies, and the ten-mile long Gold Bluffs Beach. The park is cooperatively managed along with Redwoods National Park as well as Del Norte Coast Redwoods State Park and Jedediah Smith Redwoods State Park by the Department of Parks & Recreation and the National Park Service. Prairie Creek Redwoods State park offers opportunities for hiking, nature study, wildlife viewing, beachcombing, picnicking, and a visitor center.

The project site is located within a dramatic highly scenic setting within a coastal dune ecosystem bounded by the ocean to the west and the rugged Gold Bluffs to the east. Views to along this scenic coastal area in the vicinity of the project site are afforded from Davidson Road, the beach and dune area west of the road that is open for public park use, and from the ocean itself.

Gold Bluffs Beach Campground has 25 developed campsites that each consist of a parking space, tent area, food locker, fire ring, and table. Twenty bike-in campsites are also available at the campground. Water service is provided. The Gold Bluffs Beach Campground facility utilizes treated rainwater that is stored within a 20,000-gallon aboveground water tank located east of the campground. No electrical service is available at Gold Bluffs Beach.

The proposed project would replace the existing bathroom facility that is centrally located on a high spot at approximately 15 feet above mean sea level within the campground facility. In addition to serving the campground, the restroom facility serves all day-use visitors to the Gold Bluffs Beach area, as there are not separate day-use facilities. This deteriorating facility is undersized, presents ongoing maintenance problems, does not meet ADA requirements, and is connected to a septic pit that was constructed prior to the need for permits and does not meet current North Coast Regional Water Quality Control Board (RWQCB) standards. The facility includes an outdoor shower that discharges into

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a gravel drain/dispersal area, which discharges directly to the ground and also does not meet RWQCB standards

Gold Bluffs Beach is a broad, dark sand coastline backed by rolling dunes and the steep bluff known as Gold Bluffs. Davidson Road closely parallels the toe of Gold Bluffs. Virtually all of the area west of the road, including the project area and the entire Gold Bluffs Beach campground, is situated entirely within a coastal dune ecosystem. The strand area immediately above upper intertidal zone is very sparsely vegetated. The strand community grades into a low-elevation foredune area dominated by European beachgrass (*Ammophila arenaria*). The foredunes grade into a flat hind dune area that supports greater plant diversity and cover. *Ammophila* is still dominant, but many other herbaceous and some woody species are present. In some areas, Sitka spruce (*Picea sitchensis*) are growing. Though dominated by invasive plant species and highly disturbed by human activity associated with the campground, the dune system is considered to be an environmentally sensitive habitat area (ESHA). All areas except the patches of ground directly covered by the existing restroom/shower facility, other structures, parking areas, and roads are dune ESHA.

Western snowy plover (*Charadrius alexandrinus nivosus*) and northern spotted owl (*Stix occidentalis caurina*) potentially occur in the project area. Critical Habitat for the western snowy plover is located within ¼ mile of Gold Bluffs Beach Campground, although no breeding plovers have been observed at the project site itself. Northern spotted owl is known to occur near the project area.

The pink sand-verbena (*Abronia umbellata* ssp. *breviflora*), a California Native Plant Society (CNPS) List 1B plant is known to occur at Gold Bluffs Beach. Potential habitat for two special status plant species occurs at Gold Bluff Beach, including beach layia (*Layia carnosa*) a federal and state endangered species; and (2) sand pea (*Lathyrus japonicus*), a CNPS List 2 species. A sensitive plant survey has been conducted for the project area and no sensitive plant species were identified in the project area, although sand pea was discovered within 50 meters of the project area.

An archaeological survey and records search of Gold Bluffs Beach was conducted in January 2001, which revealed no cultural resources.

## **B. Project Description**

The applicant proposes to replace the existing restroom/shower facility at the Gold Bluffs Beach Campground. The facility serves both campers and visitors coming to the Gold Bluffs Beach area for day use. The deteriorating restroom/shower facility to be replaced is undersized, presents ongoing maintenance and pollution problems, does not meet ADA requirements, and is connected to a septic pit that was constructed prior to the need for

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permits and which does not meet current North Coast Regional Water Quality Control Board (RWQCB) standards. The facility is subject to raw sewage overflows and includes an outdoor shower that discharges into the ground and also does not meet RWQCB standards. The Department proposes to replace the restroom/shower facility with a new facility to be built in the same location that would meet current ADA requirements and the septic disposal standards of the North Coast Regional Water Quality Control Board (RWQCB) and Humboldt County Division of Environmental Health.

The existing bathroom/shower facility has four toilets, 2 sinks, and one shower located outside the building. The shower is not connected to the existing septic system and instead discharges to the ground. The footprint of the existing restroom facility covers approximately 392 square feet.

The proposed bathroom/shower facility would include three unisex restrooms with three standards toilets and sinks, one unisex ADA restroom with one toilet and one sink, one standard shower, one ADA compliant shower. The showers would be connected to the new septic system and would be installed with low-flow fixtures to minimize the amount of additional water flow entering the system. There is no existing electrical lines serving Gold Bluffs Beach; hot water and lighting would be solar powered.

The applicant proposed to demolish and remove the structures that comprise the existing restroom/shower facility. The disposal location for demolition debris is not specified. The existing leach pit and septic tank would be abandoned. The sludge from the existing septic tank would be disposed of at a lawful disposal site. Holes would be drilled in the bottom of the tank, the tank lid crushed, the tank filled with clean fill, and the area above the tank backfilled with native soil.

The new 405-square-foot building would measure approximately 21 feet by 15 feet and be 13.5 feet high. The building would be approximately 13 square feet larger than the area of the existing structures that comprise the existing restroom/shower facility. The building would be constructed with wood framing and "wood like" materials, including a wood shake roof and fiber cement shingle siding.

The building would be encircled by a concrete ADA accessible walkway, and a new crushed shale walkway would be installed between the parking lot and the restroom. The two new walkways would cover approximately 640 square feet of area.

The net increase in ground coverage of the proposed replacement restroom/shower building and associated paved walkways over the existing facility is 653 square feet.

A new septic tank and conventional leach field would be installed to serve the new bathroom/shower building, replacing the existing septic tank and septic pit. The leach field would consist of a shallow gravel less system and include approximately 750 feet of

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pipeline within ten trenches that are each two feet wide. The leach field would be placed 1-1/2 to 3 feet deep. The entire septic system, including the septic tank and the leach field area would cover 5,345 square feet of area. A separate area of 4920 square feet would be set aside to the west of the proposed leach field as an area for installation of a replacement leach field if the new leach field fails in the future.

The Department proposes to rehabilitate the entire construction area of the project with native or non-invasive non-native plants after installation of the improvements. All sites where soil surface disturbance occurs would be backfilled and regarded as close to the original contours as possible. The Department plans to revegetate disturbed areas with native plants following completion of construction. Prior to the start of construction activities the composition and cover of all vegetation at the site would be monitored. Native plants within the construction area would be salvaged for later replanting as part of the revegetation plan. Erosion controls would remain in place until site vegetation has been re-established. The basic goal for the restoration work is to achieve 75% native species coverage within five years of the start of construction. Annual monitoring would occur over the five-year period.

Construction would be accomplished using standard construction methods and utilize best management practices for dust control, soil erosion, and stormwater pollution prevention. Construction staging areas would be restricted to existing roadways and parking areas.

Temporary restroom facilities would be provided at the campground during construction. These facilities would consist of two portable chemical toilets located on the existing gravel parking area at the campground.

## **C. Public Access and Recreation**

Section 30210 of the Coastal Act requires that maximum public access shall be provided consistent with public safety needs and the need to protect natural resource areas from overuse. Section 30212 requires that access from the nearest public roadway to the shoreline be provided in new development projects except where it is inconsistent with public safety, military security, or protection of fragile coastal resources, or adequate access exists nearby. Section 30211 requires that development not interfere with the public's right to access gained by use or legislative authorization. Section 30213 requires that lower cost visitor and recreational facilities shall be protected, encouraged, and where feasible provided. Section 30214 of the Coastal Act provides that the public access policies of the Coastal Act shall be implemented in a manner that takes into account the capacity of the site and the fragility of natural resources in the area. Section 30221 requires that oceanfront land suitable for recreational use shall be protected for recreational use and development unless present and foreseeable future demand for

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public or commercial recreational activities that could be accommodated is already provided for in the area. In applying Sections 30210, 30211, 30212, and 30214, the Commission is also 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 avoid or offset a project's adverse impact on existing or potential access.

The objective of the proposed project is to replace a deteriorating campground restroom/shower facility subject to raw sewage overflows, to prevent continued degradation of the environment and to maintain and enhance the recreational use of the Gold Bluff's Beach Campground and surrounding day use areas. The restroom facility to be replaced is the only such facility in the vicinity and the only plumbed public bathroom on this entire section of coastline. The facility serves both campers and day use visitors to this coastal section of Prairie Creek Redwoods State Park. Maintaining a restroom facility serves and facilitates recreational use of this portion of the coast. Therefore, the proposed project is consistent with the public access and recreational policies cited above to the extent that the development will protect recreational use and facilitate public access to the coast.

Construction of the project would have temporary impacts on public access and recreational use of the area. The restroom/shower facility would necessarily have to be closed during demolition and construction, and dune areas in the vicinity of the restroom/shower facility and the proposed leach field would also be closed off to public use during construction. However, to ensure that the campers and day visitors to Gold Bluff's Beach will continue to have facilities available for their use during the construction period, the applicant would temporarily place two portable toilets at the campground during construction. In addition, the temporary displacement of area currently available for public access use at the project site during construction would not cause a significant impact on public access and recreation. The approximately 7,000-square-foot construction area represents only a very small portion of the thousands of acres of beach and dune available in the Gold Bluffs Beach area available for public access use.

The Commission therefore finds that the project as proposed is consistent with the public access and recreational policies of the Coastal Act.

## **D. Visual Resources**

Section 30251 of the Coastal Act states that the scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance, and requires in applicable part 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



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forms, and to be visually compatible with the character of surrounding areas. New development in highly scenic areas shall be subordinate to the character of its setting.

The project site is located within a state park in a dramatic highly scenic setting within a coastal dune ecosystem bounded by the ocean to the west and the rugged Gold Bluffs to the east. Views to along this scenic coastal area in the vicinity of the project site are afforded from Davidson Road, the beach and dune area west of the road that is open for public park use, and from the ocean itself.

The small buildings of the existing restroom/shower complex are located off of Davidson Road and block a portion of the view from the road to the ocean. The view blockage is relatively small considering that Davidson Road stretches for several miles along the coast and affords expansive views to the ocean and along the scenic coastline for most of that distance. The proposed replacement restroom/shower building would be constructed in the same location as the existing restroom/shower building complex to be demolished and removed. The footprint of the new building would be approximately the same size as the total of the footprints of each of the four small buildings that make up the current restroom/shower facility. However, by consolidating all facilities in one structure, the new structure will appear more compact than the existing complex of buildings and will block a slightly smaller portion of the view shed. The new building will present a 21-foot-long façade facing the road as opposed to the approximately 35-foot-long façade presented by the current complex of buildings. Therefore, the proposed development would not have an adverse impact on views and would protect views to and along the shoreline.

The project would require grading to remove and install septic tanks and other septic system components, including installation of the new leach field. However, the septic system would be buried and the applicant proposes to reestablish existing contours in disturbed areas above the septic system and in surrounding areas affected by construction. Therefore, the project would not alter the basic topography of the site and would minimize the alteration of natural landforms.

As noted above, the proposed restroom/shower building would be visible within this highly scenic area from the road, the surrounding beach and dune area, and the ocean. Thus, the Commission must consider whether the proposed development would be subordinate to the character of its setting. The character of the project area is defined largely by the beach and dune ecosystem, the views of the open ocean, the steep bluffs east of the road, and the scattered trees growing in the area. However, the character of the project area is also defined, in part, by the existing campground facilities, including the driveways, parking areas, and campground facilities. These campground facilities in turn, include the existing restroom/shower complex. Because the new restroom/shower building would replace the existing structures in the same location, present a smaller façade as discussed above than the existing structures, and be approximately the same

height as the existing structures, the size and shape of the proposed building would be subordinate to the character of its existing setting.

Whether the proposed building is subordinate to the character of its setting is also dependent on building materials, exterior colors, and lighting that is used. As proposed, the building would be constructed with wood framing and "wood like" materials, including a wood shake roof and fiber cement shingle siding. Low voltage solar powered exterior lighting is also proposed. Such materials would blend with the surroundings and help make the development subordinate to its setting provided the colors also blend with the surroundings. Special Condition No. 6 is imposed to restrict the color and building materials used for the development to dark earth tones and to require exterior lighting to have a directional cast downward such that no light will shine beyond the approved building and walkways. As conditioned, the Commission finds that the proposed development will be subordinate to the character of its setting consistent with LUP.

Therefore, for all of the above reasons, the Commission finds that the proposed development as conditioned will protect public views to and along the coast, minimize the alteration of landforms, and be subordinate to the character of its setting consistent with the visual resource protection provisions of Section 30251 of the Coastal Act.

**EXHIBITS:**

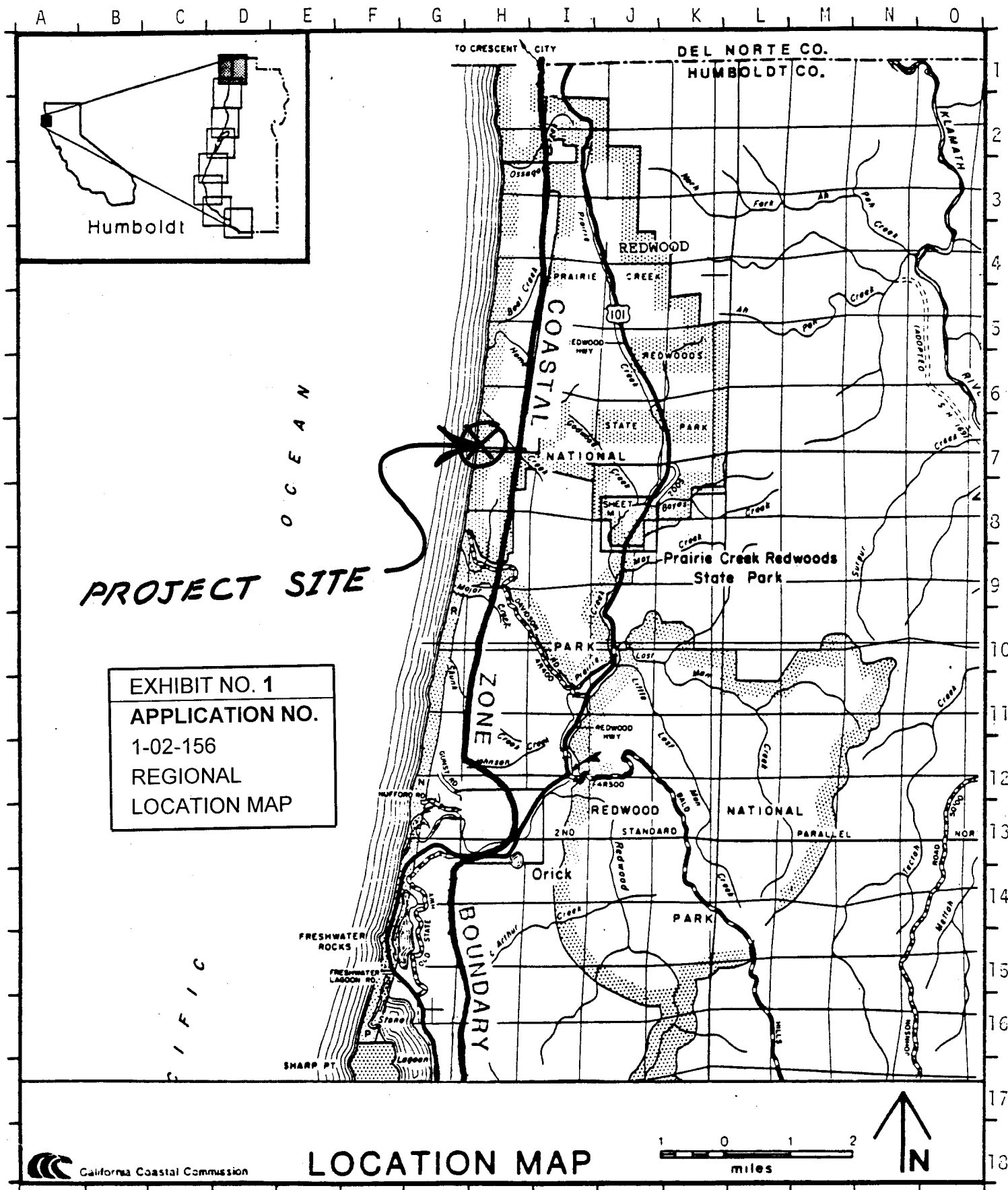
1. Regional Location Map
2. Specific Location Map
3. Site Plan
4. Building Elevations
5. Building Floor Plans
6. Applicant's Alternatives Analysis

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





# PRAIRIE CREEK REDWOODS STATE PARK PUBLIC USE IMPROVEMENTS

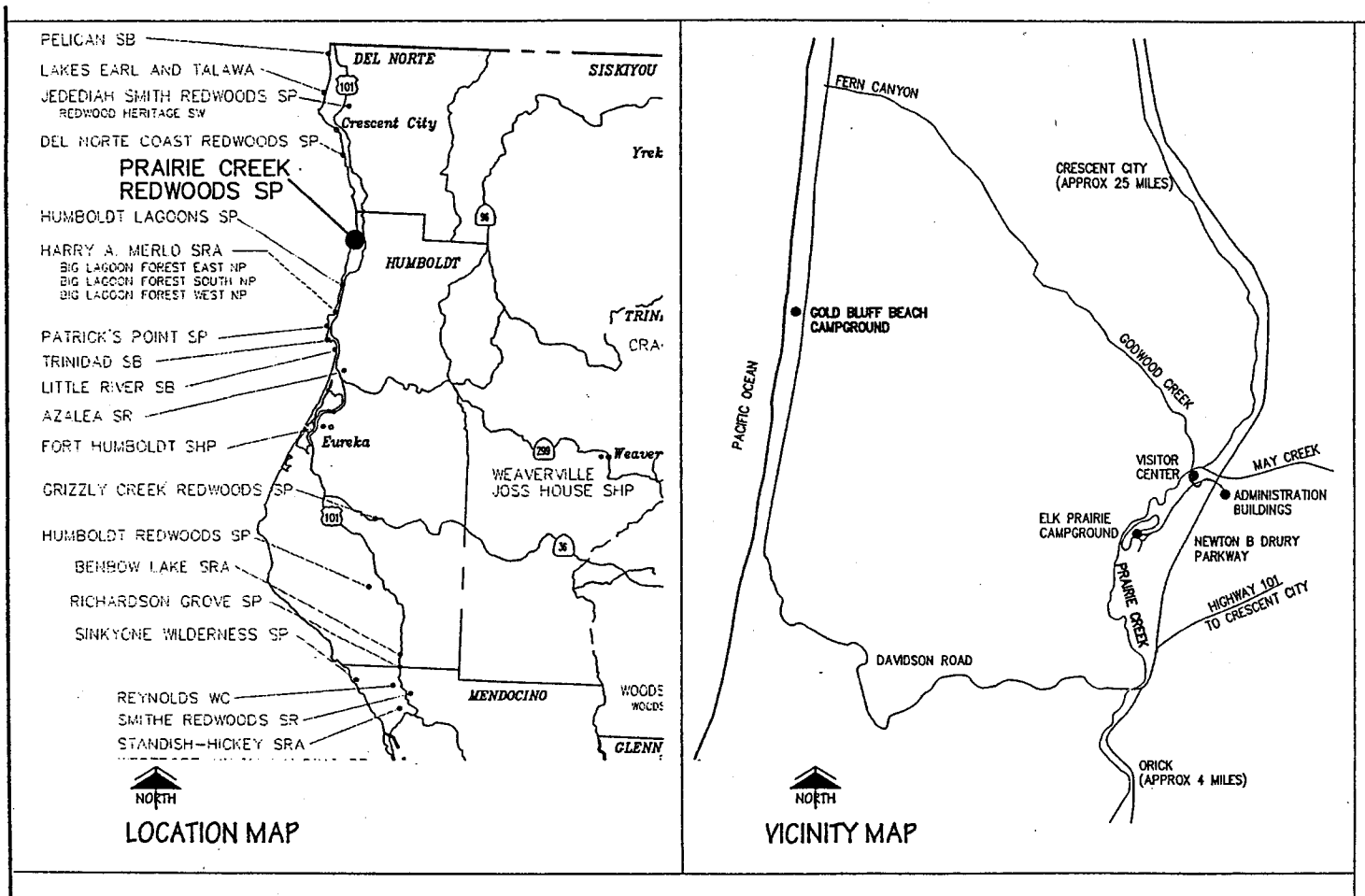


EXHIBIT NO. 2  
APPLICATION NO.  
1-02-156  
PROJECT  
VICINITY MAP

# SITE PLAN



## PUBLIC USE IMPROVEMENTS

SHEET NO.  
C-9  
OF  
XX

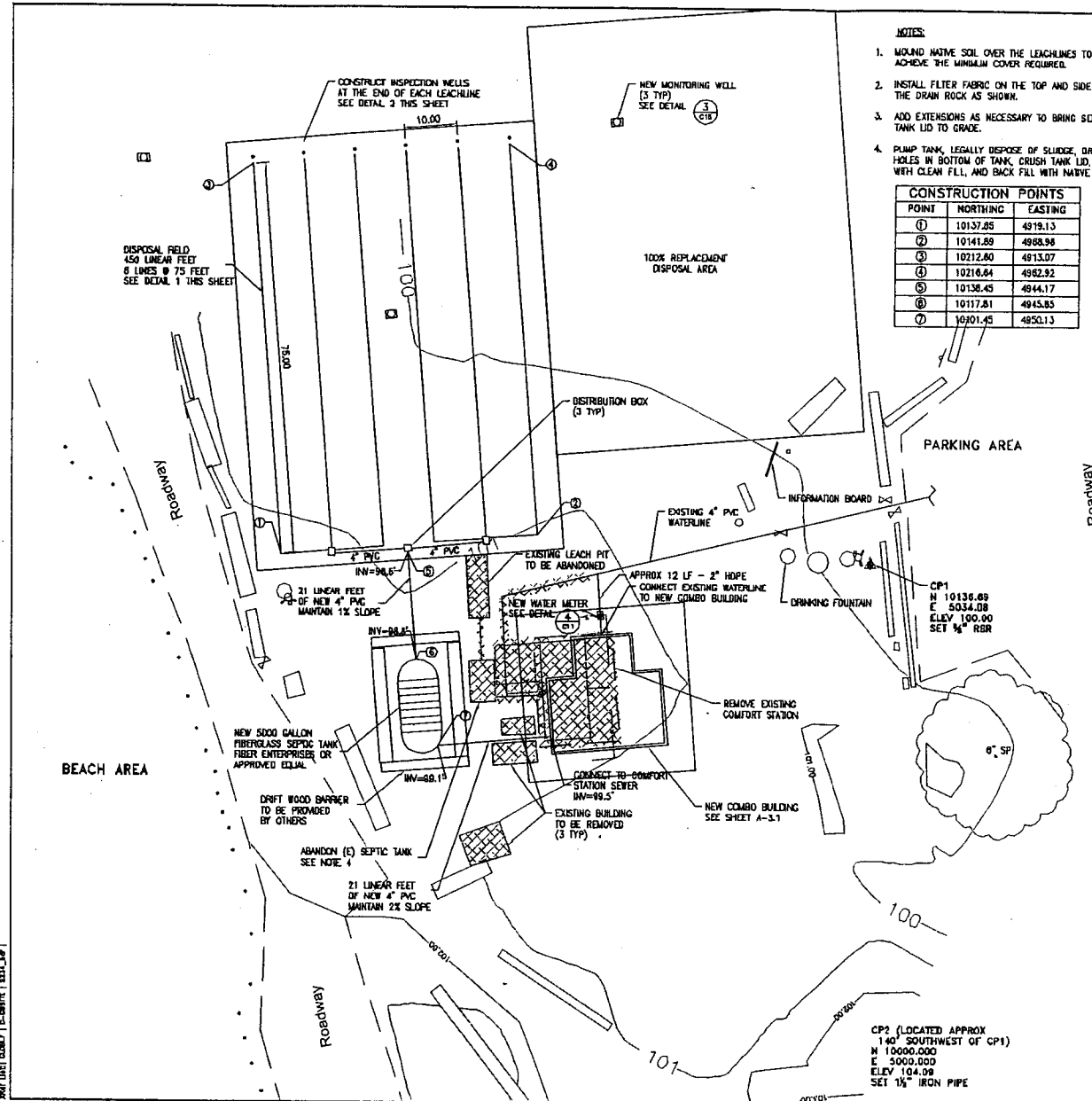


EXHIBIT NO. 4  
APPLICATION NO.  
1-02-156  
BUILDING  
ELEVATIONS



ACQUISITION  
AND  
DEVELOPMENT  
DIVISION  
One Capitol Mall  
Suite 500  
Sacramento, CA  
95814-3229

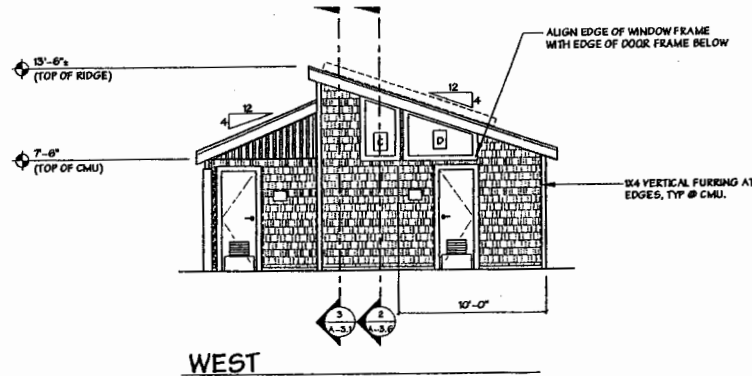
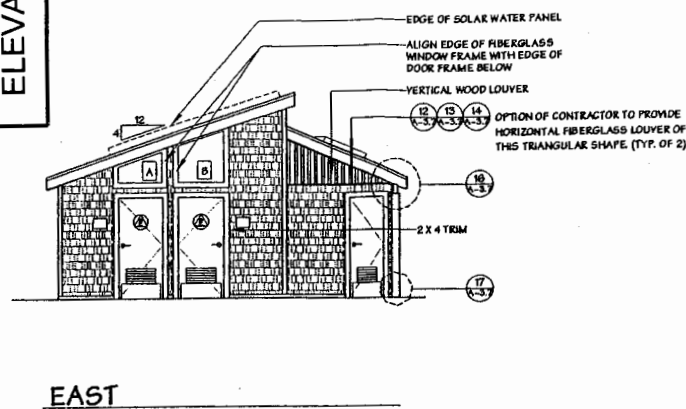
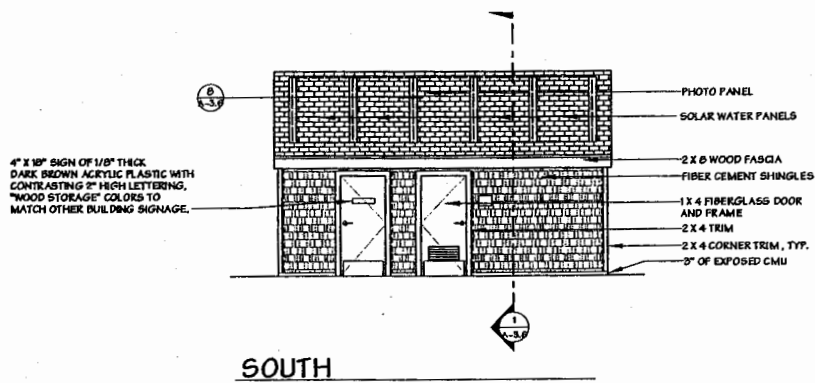
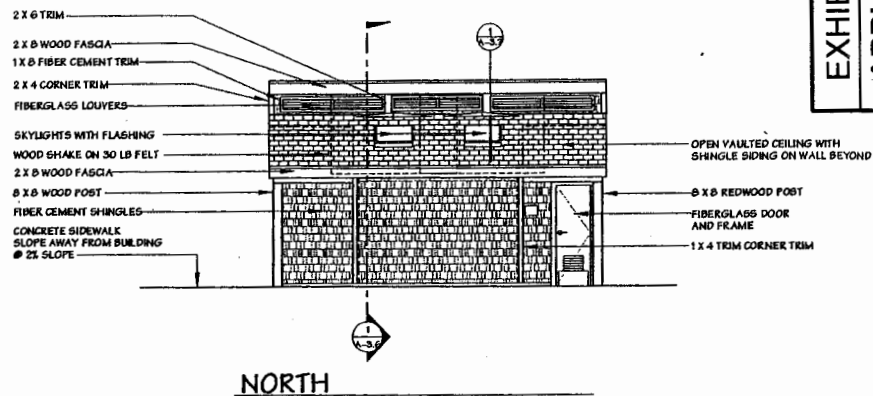
DESIGNED DO	DATE
DRAWN TSH	
CHECKED JF	
REVISIONS	DATE

PRAIRIE CREEK REDWOODS STATE PARK  
**GOLD BLUFF BEACH EXTERIOR ELEVATIONS**  
PUBLIC USE IMPROVEMENTS

DRAWING NO.  
28345.038

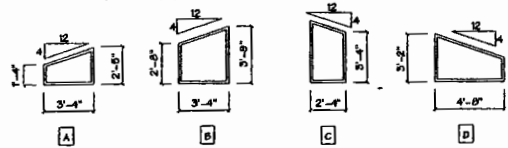
SHEET NO.  
**A-3.3**  
OF

X



**1 ELEVATIONS**

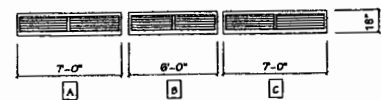
SCALE: 22' X 34' SHEET: 1/4\"/>



NOTE: FIBERGLASS FRAMES WITH POLYCARBONATE GLAZING. FIELD VERIFY ALL DIMENSIONS PRIOR TO MANUFACTURING UNITS

**2 WINDOW SCHEDULE**

SCALE: 22' X 34' SHEET: 1/4\"/>



NOTE: FIBERGLASS FRAME AND VENTS. FIELD VERIFY ALL DIMENSIONS PRIOR TO MANUFACTURING UNITS

**3 EXTERIOR LOUVERS**

SCALE: 22' X 34' SHEET: 1/4\"/>



**COORDINATION SET**

DRAWN BY: D.F.O. CHECKED BY: D.F.O. DATE:	APPROVED BY: D.F.O. DATE:
---	------------------------------

ALL DIMENSIONS UNLESS OTHERWISE SPECIFIED ARE IN FEET AND INCHES. DIMENSIONS IN PARENTHESES ARE ALTERNATE DIMENSIONS. DIMENSIONS IN BRACKETS ARE TYPICAL DIMENSIONS. DIMENSIONS IN DASHES ARE TO BE DETERMINED BY THE FIELD.



EXHIBIT NO. 5

APPLICATION NO.

1-02-156

BUILDING  
FLOOR PLAN



ACQUISITION  
AND  
DEVELOPMENT  
DIVISION  
One Capitol Mall  
Suite 500  
Sacramento, CA  
95814-3229

DESIGNED  
BY  
DRAWN  
BY  
CHECKED  
BY

REVISIONS	DATE

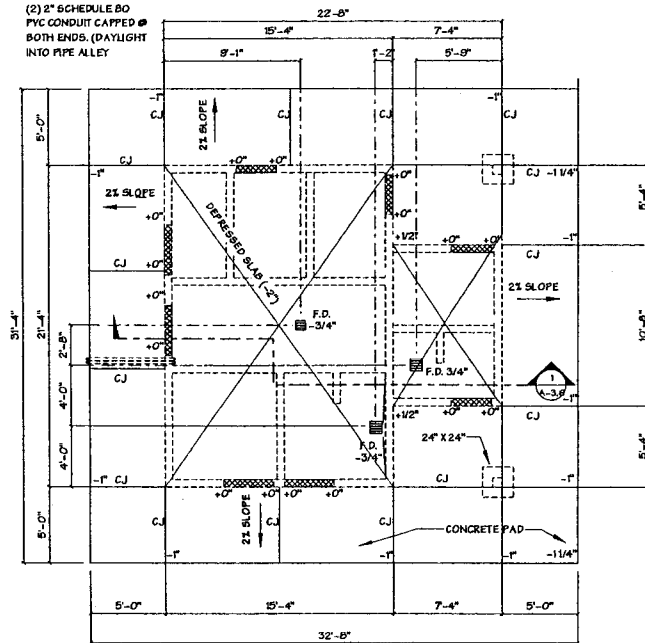
PRairie Creek REDWOODS STATE PARK  
GOLD BLUFF BEACH FLOOR PLAN  
PUBLIC USE IMPROVEMENTS

DRAWING NO.  
28345. 036

SHEET NO.  
A-3.1

X

(2) 2" SCHEDULE 80  
PVC CONDUIT CAPPED @  
BOTH ENDS. (DAYLIGHT  
INTO PIPE ALLEY



REFERENCE



1 FOUNDATION PLAN  
SCALE: 22" X 34" SHEET: 1/4" = 1'-0"  
1" X 17" SHEET: 1/8" = 1'-0"

LEGEND

STEEL TROWEL CONCRETE SMOOTH AT  
DOOR THRESHOLDS TO MATCH EXTERIOR  
WALKWAY ELEVATION, TYPICAL  
CJ CONSTRUCTION JOINT

REFERENCE



2 FLOOR PLAN  
SCALE: 22" X 34" SHEET: 1/4" = 1'-0"  
1" X 17" SHEET: 1/8" = 1'-0"

LEGEND

6 X 8 X 6 CMU WALL TO 7'-6"

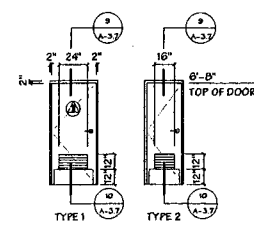


ROOM FINISH SCHEDULE

ROOM NAME	FLOOR	BASE	WALLS	CEILING	HEIGHT
RESTROOM	CERAMIC TILE	CERAMIC TILE	1-WEST C.TILE&PAINT 2-SOUTH C.TILE&PAINT 3-EAST C.TILE&PAINT 4-NORTH C.TILE&PAINT	PAINT	VARIES
ADA RESTROOM	CERAMIC TILE	CERAMIC TILE	C.TILE&PAINT	PAINT	VARIES
PIPE SPACE	SEALED CONC	NONE	PAINT	PAINT	VARIES

DOOR SCHEDULE

DOOR ID#	SIZE	DOOR TYPE	MATERIAL	LABEL	KICKPLATE	FRAME TYPE	MATERIAL	TYPE	ACCESSORIES	REMARKS
D1	2'-4" x 6'-8"	1	FIBERGLASS	NONE	10"	1	FIBERGLASS	1	FIBERGLASS VENT IN FRAME	UNDERCUT DOOR 1/2"
D2	3'-0" x 6'-8"	2	FIBERGLASS	NONE	10"	2	FIBERGLASS	2	FIBERGLASS VENT IN FRAME	UNDERCUT DOOR 1/2"
D3	3'-0" x 6'-8"	3	FIBERGLASS	NONE	NONE	3	FIBERGLASS	3	FIBERGLASS VENT IN FRAME	UNDERCUT DOOR 1/2"



COORDINATION SET

DRAWING NO. 28345. 036 SHEET NO. A-3.1 DATE 10/10/05 BY [Signature] CHECKED BY [Signature] APPROVED BY [Signature]	CALIFORNIA STATE PARKS ACQUISITION AND DEVELOPMENT DIVISION ONE CAPITOL MALL, SUITE 500 SACRAMENTO, CA 95814-3229 TEL: (916) 227-1100 FAX: (916) 227-1101
---	--

**ENGINEERING ANALYSIS**  
**FOR**  
**PRAIRIE CREEK REDWOODS STATE PARK**  
**PUBLIC USE IMPROVEMENTS – GOLD BLUFF'S BEACH**

Project No. 6745

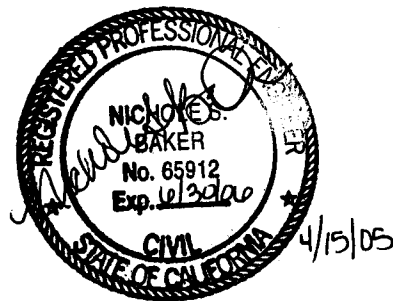
**STATE OF CALIFORNIA**  
**DEPARTMENT OF PARKS AND RECREATION**



April 2005

Prepared by

**NORTHERN SERVICE CENTER**  
**One Capital Mall**  
**Sacramento, California 95814**



**EXHIBIT NO. 6**

**APPLICATION NO.**

1-04-042

Applicant's Alternatives  
Analysis

(Page 1 of 19)

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## Background

Gold Bluff's beach is located just west of highway 101. An existing 460.1 square foot (sq ft) restroom facility services the campgrounds and is centrally located between the campgrounds on the high spot out of the flood area. The existing restroom is in poor and deteriorating condition (see pictures 1 through 4) and is planned to be replaced in the Prairie Creek Public Use Improvements major Capital Outlay project.

The purpose of this analysis is to evaluate alternative locations for the Gold Bluff restroom facility.



**Picture 1: Existing Restroom**

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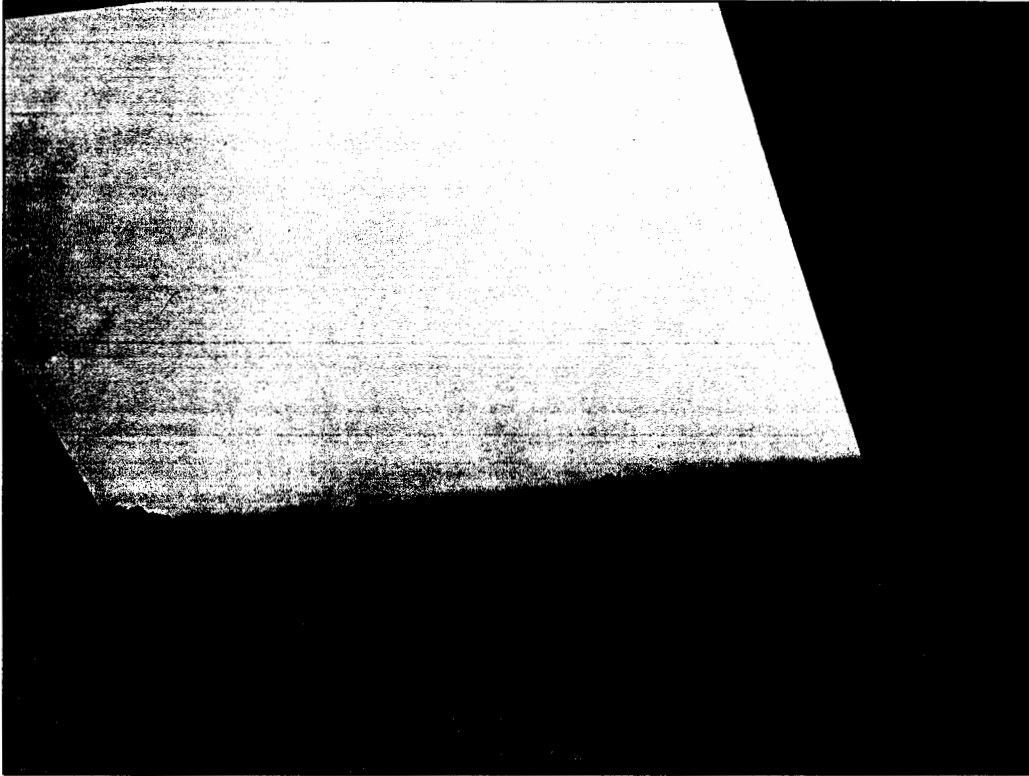


**Picture 2: Existing Damage**



**Picture 3: Existing Damage**

(Page 4 of 19)



**Picture 4: Existing leaky Skylight with Mold**

The existing restroom facility is a wood structure on grade. The restroom's footprint covers 289.4 square feet. The restroom currently has one women's restroom with two toilets and one sink, a men's restroom with one toilet, one urinal and one sink, and an external shower. The other four buildings associated with the restroom facility footprints cover a total of 170.7 square feet.

The existing facility serves day use visitors, as well as sport and commercial fishermen, and an existing campground. The campground has 25 developed campsites that each consist of a parking space, tent area, food locker, fire ring, and table. There are also 20 bike-in campsites at the campground.

Problems with the existing restroom include: rodents boring under the facility (see picture 5), getting into the sewer pipes and chewing holes in them, causing major sewer overflows three to five times a summer. The toilets also back up three to four times a week causing the wood floor to warp (see picture 6).

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**Picture 5: Rodent Borehole Beneath Restroom Facility**



**Picture 6: Warped Floor in Women's Restroom**

(Page 6 of 19)

## **Design Elements**

Design elements of a replacement restroom include four toilets, four sinks and two enclosed showers. The restroom must meet current ADA clearances and be accessible from the parking area with surfaces and slopes complying with ADA standards. Replacing the restroom will also require upgrading the septic system to meet current Regional Water Quality Control Board and County Standards.

The restroom would also need to be located within 300-feet of all campsites it is to serve in order to meet State Park guidelines.

### **Alternative One – No Project**

The first alternative is to do nothing. By not replacing the restroom the existing facility would remain until it is not feasible to repair it and then it would be closed.

The closest facilities that would be available to the public/campers are located at the day use area, Fern Canyon and Elk Prairie. The day use area consists of two pit toilets and is located approximately 0.4 miles south of the campground. Fern Canyon consists of two pit toilets and is located 1.5 miles to the north of the campground, however the road connecting the campground and Fern Canyon is only open from 9am to sunset. The closest plumbed restroom facilities are located approximately 4 miles away at Elk Prairie Campground.

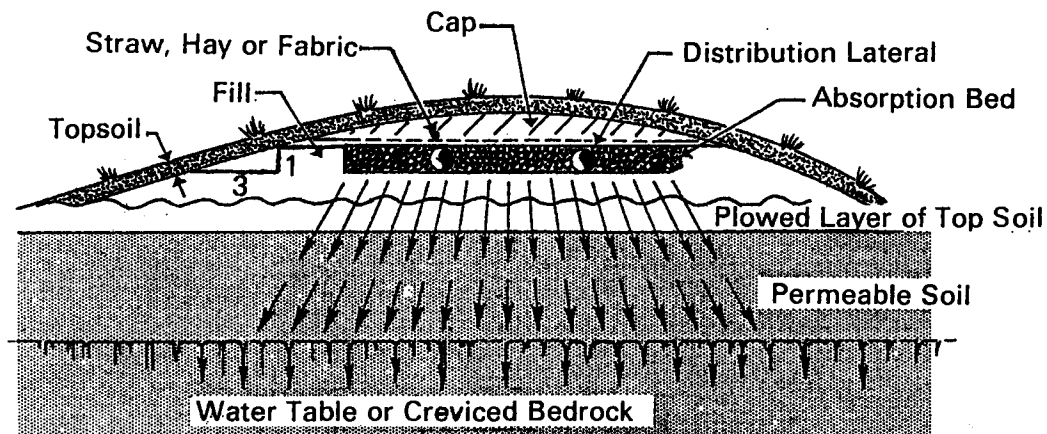
### **Alternative Two – Replace Existing Restroom in Same Location**

The second alternative is to replace the existing restroom at the existing location. This alternative would keep the facility in the current disturbed area and centralized for the campers use. However due to changes in the ADA and County laws and regulations the restroom foot print would need to be enlarged.

The existing facility is on a septic tank and pit system. Current County regulations do not allow for septic pits. Therefore a leachfield would need to be installed. The proposed leachfield would consist of six 75-linear foot trenches located in the area shown in picture 7. Other disposal alternatives were reviewed however due to the lack of power on the site the leachfield was the only feasible alternative. For example a mound system that is usually installed in areas with poor soils, shallow bedrock or high water table would require a pump to pump the sewage up to a higher elevation than the septic tank, the mound system would also require for the area to be build up in order to properly dispose of the sewage, see the following detail.

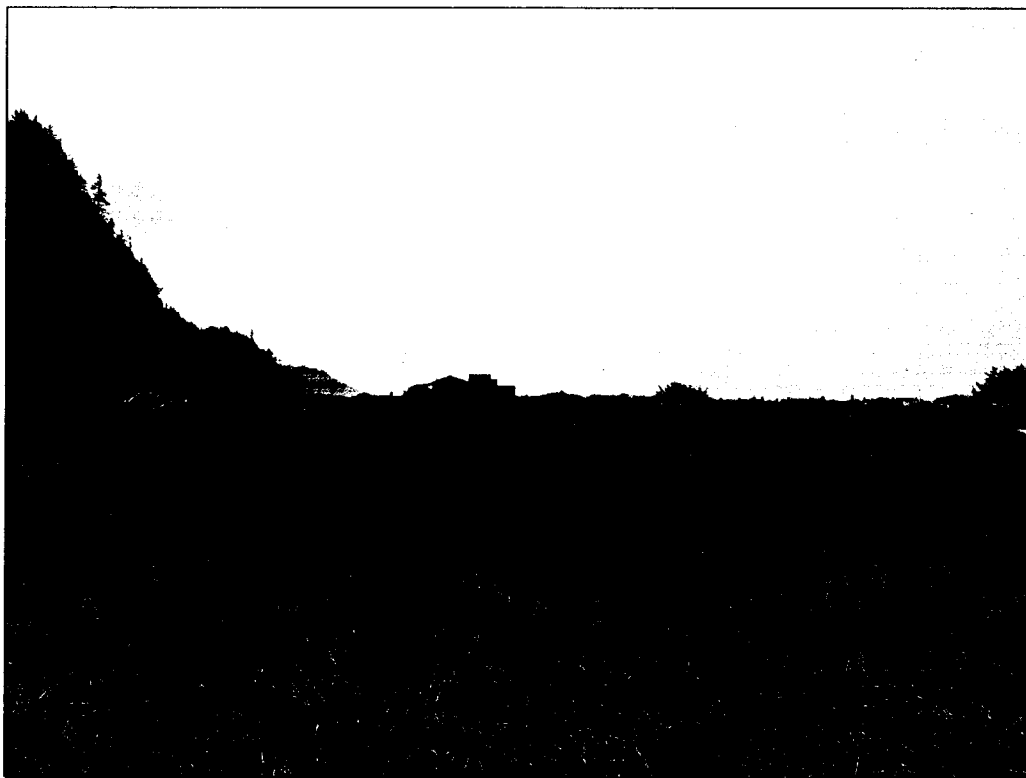
(Page 7 of 19)





(b) Cross Section of a Mound System for a Permeable Soil, with High Groundwater or Shallow Creviced Bedrock

### Mound System Detail



**Picture 7: Proposed Leachfield Area**

The proposed restroom includes three unisex restrooms with three standard toilets and sinks, one unisex ADA restroom with one toilet and one sink, one standard shower and one ADA compliant shower. The building is designed on a concrete slab, which has a foot print of 420.60 square feet. This is 39.5 square

feet less coverage than the existing restroom and associated buildings coverage. However, to comply with ADA codes, a paved walkway around the building and a crushed shale walkway from the parking lot to the restroom have been incorporated in the project. This additional coverage totals 1,045.4 square feet. The net increase in ground coverage is 545.3 square feet.

This building is expected to serve the same visiting public as the existing restroom, with no measurable increase in visitation expected.

The question was raised regarding the contribution of the showers to the leachfield. This was examined and it was determined that by not including the showers in the project the leachfield would be reduced from a total of 450-linear feet to 375-linear feet. Basically one leach line would be eliminated. However, by not including the showers in the project would result in reducing the service that is currently being provided to the public.

### **Alternative Three – Replace the Existing Restroom in a Different Location**

The fourth alternative is the located a new restroom in a different location to the east of the current location within the 360-linear feet of usable space between the main road and the fore dune. Three locations were evaluated.

The first area evaluated is located southeast of the existing restroom. This location would cause the loss of an existing ADA compliant campground. See picture 8.

The second location is located northeast of the existing restroom. See picture 9.

The third site that was evaluated is east of the main road. This area immediately slopes uphill not leaving any viable area to build in. See picture 10.

The fourth location is on the same side of the road as the existing restroom. All locations on the same side as the existing restroom facility would impact the existing campgrounds.

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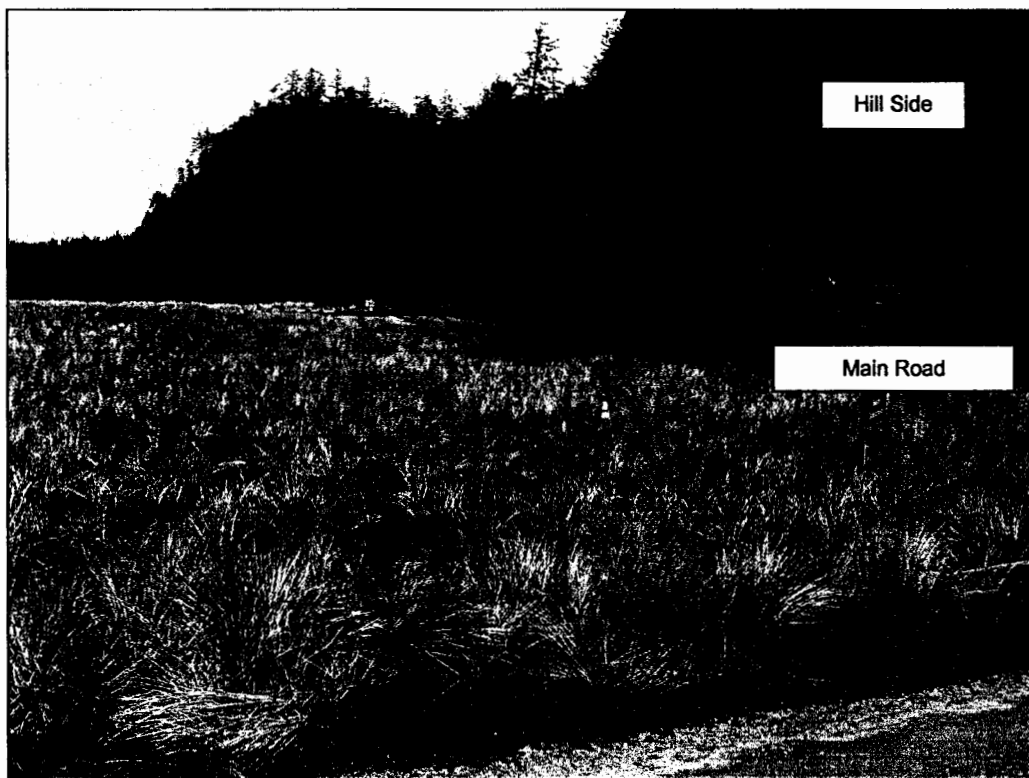


**Picture 8: Site to the Southeast**



**Picture 9: Site to the Northeast**

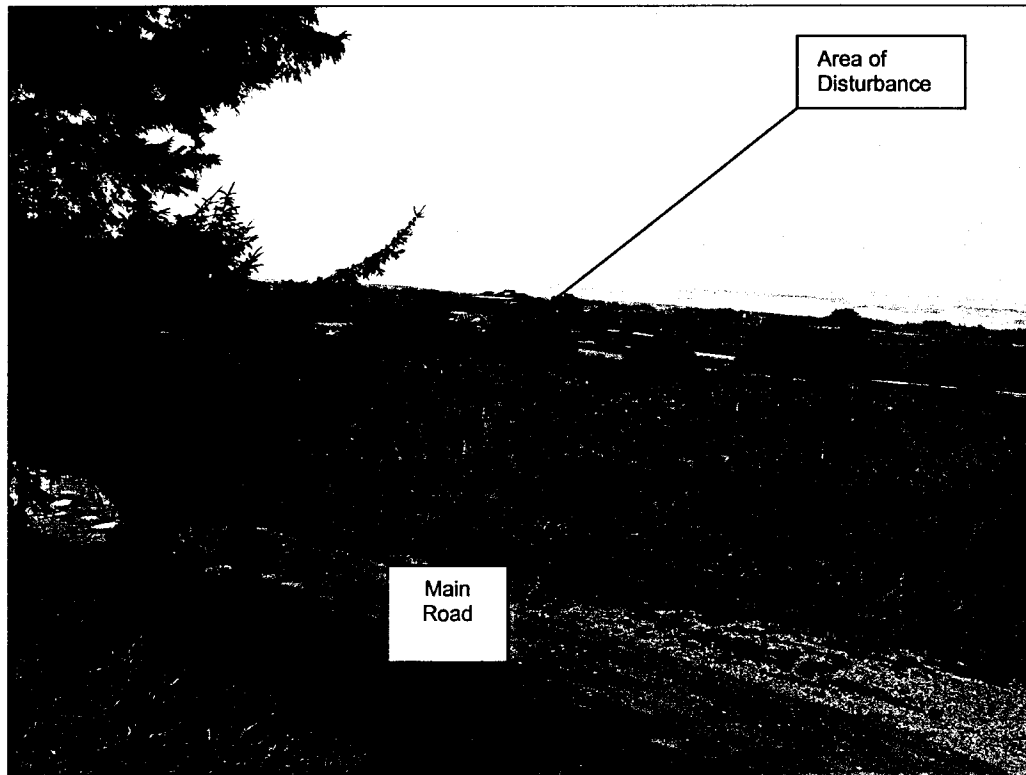
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**Picture 10: Northeast Site and Hillside**

The third site evaluated to the Northeast is the only feasible location for relocating the existing restroom facility. The site is 180-linear feet by 280-linear feet. Picture 11 shows the footprint of disturbance to the area if the restroom would be constructed at this site, not including the additional space required for ADA parking and path to the restroom. Due to the low elevation of this site fill would need to be brought in to raise the restroom facility out of the flood zone. This location is also not within 300-feet of all campgrounds that it is to service, therefore not meeting the California Department of Parks and Recreation Guidelines for placement.

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**Picture 11: Northeast Site Area of Disturbance**

## **Conclusion**

The above alternatives were considered in choosing the most appropriate solution to the existing deteriorating restroom facility.

### ***Environmental***

Laura Julian a Botanist with the California Department of Parks and Recreation examined each of the proposed sites and concluded that the existing site consists of greater exotics (Ammophila and coyote brush) and is 95% plus exotic beach grass land with no native dune grasses or habitat.

### ***Locations***

While the site to the Northeast is feasible not only would this site require fill this site would greatly increase the visibility of the facility. The existing site minimizes the visibility from the main road.

The following conditions were evaluated in choosing the preferred site: close to the campgrounds, not in the flood plane, minimize disturbance to dune habitat, and close to the campground road.

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Therefore alternative two "Replace the Existing Restroom in the Same Location" is the most feasible alternative. This alternative would keep the restroom within the previously disturbed area minimizing the "new" disturbance.

See Appendix for additional pictures around the existing restroom facility.

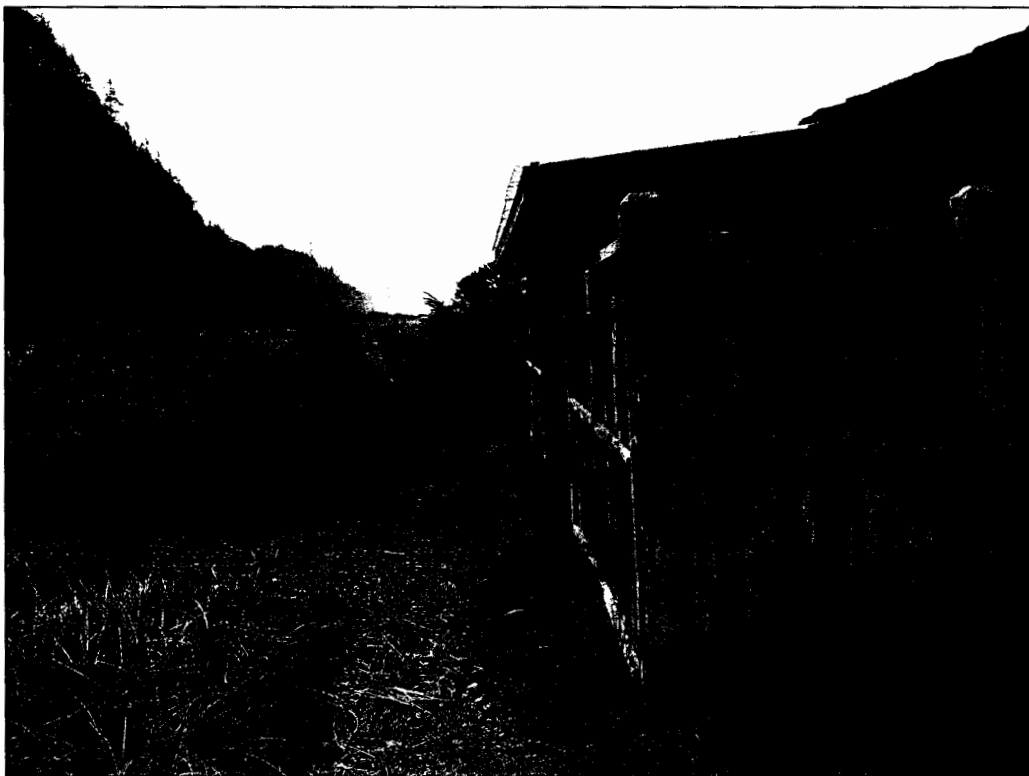
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# APPENDIX

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Looking West Towards Existing Restroom



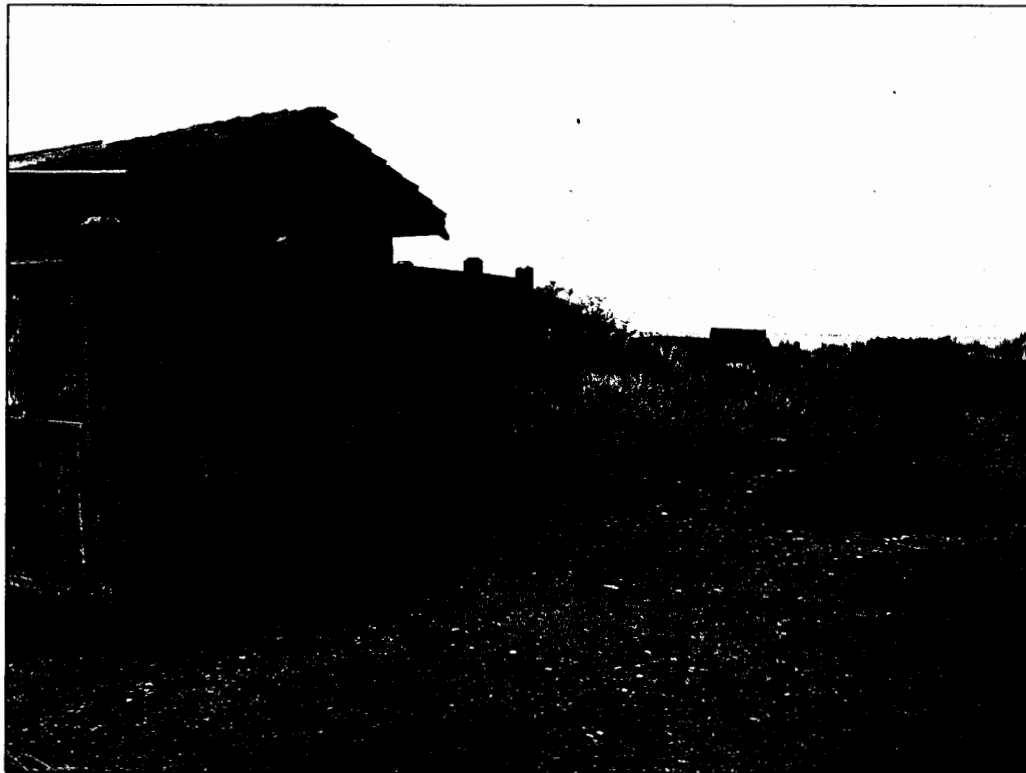
Looking South Along the Front Side of the Restroom Facility

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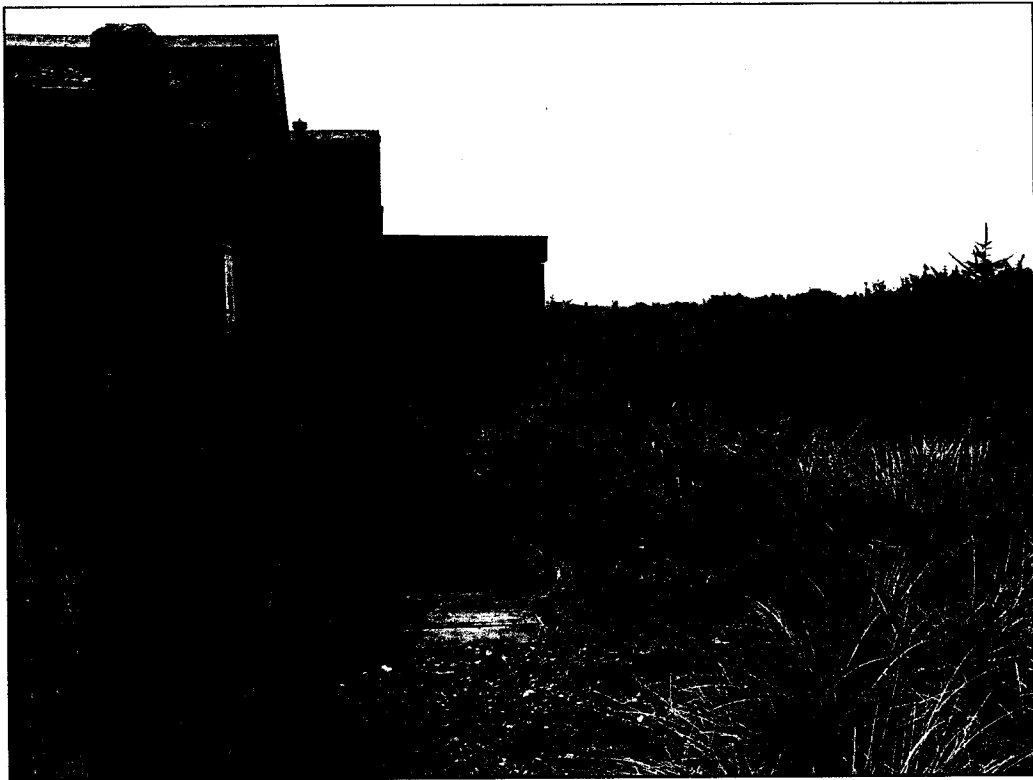


Looking Along the South Side of the Existing Restroom



Looking Along the North Side of the Existing Restroom

(Page 16 of 19)



Looking North Along the Backside of the Existing Restroom Facility

(Page 17 of 19)



DEPARTMENT OF PARKS AND RECREATION • Northern Service Center  
One Capitol Mall, Suite 500 • Sacramento, CA 95814  
(916) 445-8688

Ruth G. Coleman, Director

April 22, 2005

RECEIVED

APR 25 2005

CALIFORNIA  
COASTAL COMMISSION

Mr. Bob Merrill  
California Coastal Commission  
North Coast District  
710 E Street, Suite 200  
Eureka, California 95501  
(707) 445-7833

Dear Mr. Merrill:

Gold Bluffs Beach Campground – Replacement of Combination Building  
Coastal Development Permit Application No. 1-02-156  
**Prairie Creek Redwoods State Park**

The existing restroom facility at Gold bluffs Beach is proposed to be replaced in the California Department of Parks and Recreation Prairie Creek Public Use Improvements Major Capital Outlay Project.

This restroom is proposed to be replaced due to its deteriorating condition and its continuous threat to water quality and public health. Rodents currently bore under the facility getting into the sewer piping and chewing holes in the pipes resulting in major raw sewer overflows and restroom closures three to five times a summer. The toilets also back up and overflow three to four times a week causing the wood floor to warp. Due to the regularity of the toilets overflowing the Park has at times placed plungers in the restrooms in hope that the public will attempt to unplug the toilet prior to causing additional damage and health concerns and degradation of the environment.

Various disposal alternatives were explored prior to determining that a leachfield is the most viable disposal alternative for the proposed restroom replacement at Gold Bluffs Beach.

The following is brief analysis of the disposal alternatives:

**FAST (Fixed Activated Sludge Treatment) System:** The FAST system generates a cleaner effluent thus reducing the size of the leachfield required. However, the system requires a 2<sup>nd</sup> septic tank or a two compartment septic tank and a compressor. Due to the site does not have power and that the propose of this analysis is to explore alternatives that would result in less disturbance this alternative is not viable.

**Recirculating Sand Filter:** Recirculating sand filters (RSFs) use the partially treated sand filter effluent to dilute the incoming filtered septic tank effluent. This recirculation and dilution allows the filter size to be reduced while still achieving "advanced" treatment levels. This alternative also generates a cleaner effluent thus requires less leachfield. Recirculating filters are ideally suited for larger flows, including commercial and community applications. A series of pumps is required to recirculate the partially treated effluent thus due to the lack of power at the site this alternative is not viable.

**Irrigation:** Another alternative is to use the effluent for irrigation. This alternative requires extensive treatment (much greater than that achieved in a septic tank) and an area to irrigate. The treatment process and the irrigation system require power to operate pumps and other components. Due to there is not an immediate area to irrigate and the lack of power on the site this is not a viable alternative.

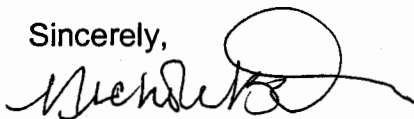
**Package Treatment Plants:** Package treatment plants are great for small communities. These plants offer advanced treatment in a variety of small footprints at a economic cost. The advanced treatment results in less leachfield area being required. However, all package treatment plants require power to operate and due to the lack of power at the site this is not a viable alternative.

**Evaporation ponds:** Evaporation ponds are lined ponds that allow the effluent to evaporate. This alternative is usually used in areas were land disposal is not a viable alternative due to soil conditions or high ground water. The amount/area of ponds required depends on the evaporation rate of the area the ponds are to be installed. In areas with mild temperatures a great amount of area is required and during the winter storage tanks are required to store the effluent until weather permits for evaporation. Due to this analysis is to explore alternatives that would result in less ground disturbance this alternative is not viable.

The other alternative is to not replace the restroom and close the existing restroom at the end of its useful life. Do to there is no other developed area for miles the day use visitors and campers would need to find other locations to use the restroom, resulting in surface and groundwater degradation.

Due to none of the other disposal alternatives meet the criteria of no power, minimal disturbance and improving public health it was concluded that a leachfield was the most viable alternative meeting current County Health and Regional Water Quality Board regulations.

Sincerely,



Nichole Baker, PE