

CALIFORNIA COASTAL COMMISSION

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STAFF REPORT: REGULAR CALENDAR

Application No.: 5-15-0591

Applicants: Tuna Club of Santa Catalina Island and City of Avalon

Agent: Anchor, QEA (ATTN: Adam Gale)

Location: 100 St. Catherine Way, Avalon, Los Angeles County

Project Description: Request for the permanent authorization for the replacement of two (2) missing piles and repair of 16 damaged pier piles (out of total 118 piles that support the Tuna Club facility) approved under Emergency Permit Nos. G-5-15-0003 and G-5-16-0068. The proposed project also includes repair of one brace connection, replacement of 20 utility hangers, repainting of the above-water clubhouse, and repair over a 3-year period of an additional 42, 14-in. diameter, piles using a “splice” method retaining the existing foundation/footing for each pile and replacement of the portion of pile above the scour line with 12-in. diameter ACZA treated wood, which will be wrapped and sealed from saltwater intrusion (preventing direct contact with the marine environment). No pile driving or excavation is proposed. In addition, the proposal includes a docent program that offers free public tours of the Tuna Club facility 8-10 times a year.

Staff Recommendation: Approval with conditions.

SUMMARY OF STAFF RECOMMENDATION

The Tuna Club of Santa Catalina Island and the City of Avalon are requesting the permanent authorization for the replacement and repair of damaged piles approved under Emergency Permits No. G-5-15-0003 and G-5-16-0068. The applicants are also proposing additional repairs over a 3-year period of 42 piles using a “splice” method.

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No pile driving or excavation is proposed. Pile work will be completed at low/extreme low tidal conditions; pile work in deeper water will be completed by divers. No changes are proposed to the size, configuration, or use of the structure.

The existing 7,361 sq. ft. pier, subject to this application, is constructed over State Tidelands that are administered and owned by the City of Avalon pursuant to an agreement with the State Lands Commission settled in 1963, whereby the City was granted ownership over the tidelands in this area. The City of Avalon owns the pier and leases it to the Tuna Club of Santa Catalina Island ("Tuna Club"). For a century, the Tuna Club has leased the structure. As part of the proposed project, the Tuna Club is will offer public tours of its facility 8-10 times a year with no entrance fee under a docent program.

A coastal development permit is required from the Coastal Commission because the proposed development is located seaward of the mean high tide line on submerged lands within the Commission's area of original jurisdiction.

Commission staff recommends **approval** of the proposed development with 13 special conditions requiring the applicants to: **1)** submit final plans prior to the issuance of the permit and undertake development in accordance with the approved final plans; **2)** duration of permit; **3)** submit annual maintenance activities report; **4)** submit docent program and signage plan; **5)** submit a statement of non-discrimination; **6)** assume the risks of the development, waive liability against the Commission, and indemnify the Commission against future claims; **7)** carry out pre-construction and post-construction eelgrass surveys and provide eelgrass mitigation consistent with the California Eelgrass Mitigation Policy if the post-construction survey identifies an adverse impact to eelgrass; **8)** carry out a pre-construction *Caulerpa taxifolia* survey; **9)** implement construction best management practices; **10)** dispose of all demolition and construction debris at an appropriate location; **11)** install piles consistent with material requirements; **12)** protect public rights; and **13)** comply with the requirements of the resource agencies.

The motions and resolutions to approve the application are on page four of this staff report. The applicants are agreement with the staff recommendation.

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APPENDICES

Appendix A – Substantive File Documents

EXHIBITS

- Exhibit 1 – Project Location
- Exhibit 2 – Aerial of Site
- Exhibit 3 – Pile Plan
- Exhibit 4 – Splice Plan Method

I. MOTION AND RESOLUTION

Motion:

*I move that the Commission **approve** Coastal Development Permit Application No. 5-15-0591 pursuant to the staff recommendation.*

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:

The Commission hereby approves Coastal Development Permit 5-15-0591 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 either 1) feasible mitigation measures and/or alternatives have been incorporated to substantially lessen any significant adverse effects of the development on the environment, or 2) there are no further feasible mitigation measures or alternatives that would substantially lessen any significant adverse impacts of the development on the environment.

II. STANDARD CONDITIONS

This permit is granted subject to the following 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 permittees or authorized agent, acknowledging receipt of the permit and acceptance of the terms and conditions, is returned to the Commission office.
2. **Expiration.** If development has not commenced, the permit will expire two years from the date on which the Commission voted on the application. Development shall be pursued in a diligent manner and completed in a reasonable period of time. Application for extension of the permit must be made prior to the expiration date.
3. **Interpretation.** Any questions of intent of interpretation of any condition will be resolved by the Executive Director or the Commission.
4. **Assignment.** The permit may be assigned to any qualified person, provided assignee files with the Commission an affidavit accepting all terms and conditions of the permit.
5. **Terms and Conditions Run with the Land.** These terms and conditions shall be perpetual, and it is the intention of the Commission and the permittees to bind all future owners and possessors of the subject property to the terms and conditions.

III. SPECIAL CONDITIONS

This permit is granted subject to the following special conditions:

1. Final Project Plans.

- A. PRIOR TO THE ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicants shall submit, for the review and approval of the Executive Director, two (2) full-sized sets of Final Project Plans identifying the 42 piles in need of repair (utilizing the “splice” method), and evidence that the City of Avalon and an appropriately licensed professional has reviewed and approved all final project plans. The final project plans shall be in substantial conformance with the plan received by South Coast District staff on November 16, 2016 attached as **Exhibit 4** of the staff report dated November 23, 2016.
- B. The permittees shall undertake development in accordance with the approved final plans. Any proposed changes to the approved final plans shall be reported to the Executive Director. No changes to the approved final plans shall occur without a Commission-approved amendment to this Coastal Development Permit unless the Executive Director determines that no amendment is legally required.

2. Duration of Permit – Three-year Term

- A. Coastal Development Permit No. 5-15-0591 authorizes repair/maintenance development for a three-year period, from the date of Commission action (i.e., until December 7, 2019), after which time the authorization for any unconstructed development approved as part of this permit shall cease. After the authorization for the development expires, any additional pier repair within the project area will require either the issuance of a new coastal development permit or an amendment to this coastal development permit.

3. Annual Maintenance Activities Report.

- A. PRIOR TO COMMENCEMENT of any repair/maintenance activity, the applicant shall submit to the Executive Director a detailed Annual Maintenance Activities Report listing the repair/maintenance activities of the subject pier within the coastal zone for that year for concurrence that the proposed repair/maintenance work meets the requirements of this Coastal Development Permit No. 5-15-0591 (i.e., would result in no or less than minimal environmental impact). At minimum, the Annual Maintenance Activities report shall include:
 - i. schedule of work, maintenance access and staging plans and equipment;
 - a. Materials staging and equipment storage is not permitted to block public pedestrian access.
 - ii. site specific reconnaissance within each of the facilities proposed for maintenance and acreage of jurisdictional impacts, if any;
 - iii. habitat surveys if any habitat/vegetation has developed at the site over time if there is a risk of adverse impact by the specific type of maintenance proposed at that particular site;
 - iv. the Annual Maintenance Activities Report and reconnaissance surveys shall be public documents available for review by the public or any interested parties;

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- B. The applicants shall submit an annual post-maintenance assessment summarizing the maintenance practices, timing of implementation, and whether any sensitive species were observed and any measures taken to avoid or mitigate disturbance.
 - C. Proposed changes to the project may require a permit amendment or new permit. Any proposed changes to the approved program shall be reported to the Executive Director. No change to the program shall occur without a Commission-approved amendment to the permit unless the Executive Director determines that no such amendment is required.
4. **Docent Program – Public Tours of Tuna Club.** PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the Tuna Club shall provide for review and approval by the Executive Director, a final docent program and signage plan as proposed and as follows:
- A. The docent program shall include free docent-led tours of the Tuna Club facility, available to the general public, on at least 10 days per year, for the life of the structure.
 - B. Signage shall be permanently posted at a conspicuous place, easily seen by the public at the site of the proposed development, and shall be updated annually by no later than 30th of January. Signage shall include the following:
 - i. Tour Dates and Availability
 - ii. Hours of Operation
 - iii. Instructions on how to make reservations

Each January, the Tuna Club shall submit an annual report to the Commission that documents compliance with this condition.

The permittee shall undertake the docent-led tours of the Tuna Club facility in accordance with the approved program. Any proposed changes to the approved program shall be reported to the Executive Director. No changes to the program shall occur without a Coastal Commission approved amendment to this coastal development permit unless the Executive Director determines that no amendment is required.

5. **Statement of Non-Discrimination.** PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the Tuna Club shall submit to the Executive Director proof that its bylaws, or other type of governing document if no bylaws exist, include the following prohibition on the discrimination of membership eligibility: “The Tuna Club shall not discriminate on the basis of race, national origin, ethnic group identification, religion, age, sex, sexual orientation, color, genetic information, in its membership, activities or operations.”

No changes to the language required under this condition shall be made in the permittee’s governing document unless such changes are authorized through an amendment to this coastal development permit or through a new coastal development permit, if legally required. The requirement for this non-discrimination policy shall remain in effect during the life of this project.

6. **Assumption of Risk, Waiver of Liability and Indemnity.**
- A. By acceptance of this permit, the applicants acknowledge and agree (i) that the site may be subject to hazards from flooding, sea level rise, erosion and wave uprush; (ii) to assume the risks to the applicants and the property that is the subject of this permit of injury and damage from such hazards in connection with this permitted development; (iii) to unconditionally

waive any claim of damage or liability against the Commission, its officers, agents, and employees for injury or damage from such hazards; and (iv) to indemnify and hold harmless the Commission, its officers, agents, and employees with respect to the Commission's approval of the project against any and all liability, claims, demands, damages, costs (including costs and fees incurred in defense of such claims), expenses, and amounts paid in settlement arising from any injury or damage due to such hazards.

- B. PRIOR TO ISSUANCE OF COASTAL DEVELOPMENT PERMIT, the applicants shall submit a written agreement, in a form and content acceptable to the Executive Director, incorporating all of the above terms of this condition.

7. Pre-Construction and Post-Construction Eelgrass Surveys.

- A. Pre-Construction Eelgrass Survey. A valid pre-construction eelgrass (*Zostera marina*) survey shall be completed during the period of active growth of eelgrass (typically March through October). The pre-construction survey shall be completed prior to the beginning of construction and shall be valid until the next period of active growth. If any portion of the project commences in a previously undisturbed area after the last valid eelgrass survey expires, a new survey is required prior to commencement of work in that area. The survey shall be prepared in full compliance with the "California Eelgrass Mitigation Policy" dated October 2014 (see http://www.westcoast.fisheries.noaa.gov/habitat/habitat_types/seagrass_info/california_eelgrass.html) (except as modified by this special condition) adopted by the National Marine Fisheries Service and shall be prepared in consultation with the California Department of Fish and Wildlife. The permittee shall submit the eelgrass survey for the review and approval by the Executive Director within five (5) business days of completion of each eelgrass survey and in any event no later than fifteen (15) business days prior to commencement of any development.
- B. Post Construction Eelgrass Survey. If any eelgrass is identified in the project area by the survey required in subsection A of this condition above, within one month after the conclusion of construction, the permittee shall survey the project site to determine if any eelgrass was adversely impacted. The survey shall be prepared in full compliance with the "California Eelgrass Mitigation Policy" dated October 2014 (except as modified by this special condition) adopted by the National Marine Fisheries Service and shall be prepared in consultation with the California Department of Fish and Wildlife. The permittee shall submit the post-construction eelgrass survey for the review and approval by the Executive Director within thirty (30) days after completion of the survey. If any eelgrass has been impacted, the permittee shall replace the impacted eelgrass at a minimum 1.38:1 ratio on-site, or at another location, in accordance with the California Eelgrass Mitigation Policy. The exceptions to the required 1.38:1 mitigation ratio found within the California Eelgrass Mitigation Policy shall not apply. Implementation of mitigation shall require an amendment to this permit or a new Coastal Development Permit unless the Executive Director determines that no amendment or new permit is legally required.

8. Pre-Construction Caulerpa Taxifolia Survey.

- A. Not earlier than 90 days nor later than 30 days prior to commencement or re-commencement of any development authorized under this Coastal Development Permit (the "project"), the permittees shall undertake a survey of the project area and a buffer area at least 10 meters beyond the project area to determine the presence of the invasive alga *Caulerpa taxifolia*. The survey shall include a visual examination of the substrate. If any portion of the project

commences in a previously undisturbed area after the last valid *Caulerpa taxifolia* survey expires, a new survey is required prior to commencement of work in that area.

- B. The survey protocol shall be prepared in consultation with the Regional Water Quality Control Board, the California Department of Fish and Wildlife, and the National Marine Fisheries Service.
- C. Within five business days of completion of the survey, the permittees shall submit the survey:
 - i. for the review and approval by the Executive Director; and
 - ii. to the Surveillance Subcommittee of the Southern California Caulerpa Action Team (SCCAT). The SCCAT Surveillance Subcommittee may be contacted through William Paznokas, California Department of Fish & Wildlife (858-467-4218) or Bryant Chesney, National Marine Fisheries Service (562-980-4043), or their successors.
- D. If *Caulerpa taxifolia* is found within the project or buffer areas, the permittees shall not proceed with the project until 1) the permittee provides evidence to the Executive Director that all *Caulerpa taxifolia* discovered within the project and buffer area has been eliminated in a manner that complies with all applicable governmental approval requirements, including but not limited to those of the California Coastal Act, or 2) the permittee has revised the project to avoid any contact with *Caulerpa taxifolia*. No revisions to the project shall occur without a Coastal Commission approved amendment to this Coastal Development Permit unless the Executive Director determines that no amendment is legally required.

9. Construction Best Management Practices.

- A. The permittees shall comply with the following construction-related requirements:
 - i. No construction materials, debris, or waste shall be placed or stored where it may be subject to wave, wind, rain, or tidal erosion and dispersion;
 - ii. Any and all debris resulting from construction activities shall be removed from the project site within 24 hours of completion of the project;
 - iii. Construction debris and sediment shall be removed from construction areas each day that construction occurs to prevent the accumulation of sediment and other debris which may be discharged into coastal waters;
 - iv. Erosion control/sedimentation Best Management Practices (BMP's) shall be used to control dust and sedimentation impacts to coastal waters during construction. BMP's shall include, but are not limited to: placement of sand bags around drainage inlets to prevent runoff/sediment transport into coastal waters; and
 - v. All construction materials, excluding lumber, shall be covered and enclosed on all sides, and as far away from a storm drain inlet and receiving waters as possible.
- B. Best Management Practices (BMP's) designed to prevent spillage and/or runoff of construction-related materials, sediment, or contaminants associated with construction activity shall be implemented prior to the on-set of such activity. Selected BMP's shall be

maintained in a functional condition throughout the duration of the project. Such measures shall be used during construction:

- i. The permittees shall ensure the proper handling, storage, and application of petroleum products and other construction materials. These shall include a designated fueling and vehicle maintenance area with appropriate berms and protection to prevent any spillage of gasoline or related petroleum products or contact with runoff. It shall be located as far away from the receiving waters and storm drain inlets as possible;
- ii. The permittees shall develop and implement spill prevention and control measures;
- iii. The permittees shall maintain and wash equipment and machinery in confined areas specifically designed to control runoff. Thinners or solvents shall not be discharged into sanitary or storm sewer systems. Washout from concrete trucks shall be disposed of at a location not subject to runoff and more than 50 feet away from a storm drain, open ditch or surface water; and
- iv. The permittees shall provide adequate disposal facilities for solid waste, including excess concrete, produced during construction.

10. **Location of Debris Disposal Site.** The permittee shall dispose of all demolition and construction debris resulting from the proposed project at an appropriate location. If the disposal site is located within the Coastal Zone, the permittees shall notify the Executive Director of the location in order to determine if a Coastal Development Permit or an amendment to this permit shall be required before disposal can take place.

11. **Pile Material.** Material used for construction of piers, pilings, docks, dolphins, or slips shall not include timber preserved with creosote, Ammoniacal Copper Arsenate (ACA), or similar petroleum-derived products. Pilings treated with Ammoniacal Zinc Arsenate (ACZA) or Chromated Copper Arsenate (CCA) shall be used only if wrapped or coated prior to installation with a water tight plastic sleeve, or similar sealant. To prevent the introduction of toxins and debris into the marine environment, the use of plastic wrapped pilings (e.g., PVC Pilewrap) and reinforced plastic for pilings (e.g., high density polyethylene (HDPE) pile armor), shall conform to the following requirements:

- B. The material used shall be durable and a minimum of one-tenth of an inch thick.
- C. All joints shall be sealed to prevent leakage.
- D. Measures shall be taken to prevent ACA, CCA and/or ACZA from dripping over the top of plastic wrapping into State Waters. These measures may include wrapping pilings to the top or installing collars to prevent dripping.
- E. The permittees shall inspect all pilings repaired under this permit to ensure the integrity of the pilings on an annual basis for all piles, beginning January 2017, and shall immediately undertake any repairs necessary to maintain the wrapping and/or structural integrity of the piles. The inspections shall be conducted during periods of extreme low tides. Alternatively, the permittees may submit a different timeline for the piling inspection program that ensures that the plastic wrapping and/or structural integrity of the pile is properly maintained; the alternative timeline shall be reviewed and approved by the Executive Director prior to the installation of plastic pilings.
- F. The permittees shall be made responsible for removal of failed piles or materials.

- G. If, prior to commencement of a particular pile repair, federal or state regulatory agencies, through new or better scientific information, determine that environmentally less damaging materials or methods are available for new piles or piling replacement, and are feasible to implement, the permittee shall, after consultation with the Executive Director, revise procedures or use alternative materials consistent with the new information. The substitution of non-plastic piling materials may be authorized by the Executive Director. Other revisions, including the use of other preservative-treated piles, may require an amendment to this permit.

12. **Public Rights.** The Coastal Commission's approval of this Coastal Development Permit No. 5-15-0591 shall not constitute a waiver of any public rights that may exist on the property. The permittees shall not use this coastal development permit as evidence of a waiver of any public rights that may exist on the property.

13. **Resource Agencies.** The permittees shall comply with all requirements, requests and mitigation measures from the Regional Water Quality Control Board, California Department of Fish and Wildlife, National Marine Fisheries Service, and the U.S. Army Corps of Engineers with respect to preservation and protection of water quality and marine environment. Any change in the approved project that may be required by the above-stated agencies shall be submitted to the Executive Director in order to determine whether the proposed change shall require a permit amendment pursuant to the requirements of the Coastal Act and the California Code of Regulations.

IV. FINDINGS AND DECLARATIONS

A. PROJECT DESCRIPTION AND LOCATION

The Tuna Club of Santa Catalina Island and the City of Avalon are requesting the permanent authorization for the replacement of two missing piles and repair of four damaged piles (out of total 118 piles that support the Tuna Club facility) approved under Emergency Permit No. G-5-15-0003, and for repair of an additional 12 degraded piles with 50% or more of section loss under Emergency Permit No. G-5-16-0068. The emergency work under Emergency Permit No. G-5-15-0003 also consisted of: the removal and replacement of one 16 sq. ft. concrete footing; and encasements of the four damaged piles.

The applicants are also proposing additional repairs consisting of: (1) mechanically refasten one existing brace connection to the pile; (2) replacement of 20 timber sewer-line utility hangers with stainless steel hangers at the same locations; (3) repainting of the above-water clubhouse in same historically approved color scheme; and (4) repair of an additional 42 degraded piles using a "splice" method retaining the existing foundation/footing for each pile and replacement of the portion of existing 14-in. diameter pile above the scour line with 12-in. diameter ACZA treated wood, which will be wrapped and sealed from saltwater intrusion (preventing direct contact with the marine environment). No pile driving or excavation is proposed. Pile work will be completed at low/extreme low tidal conditions; pile work in deeper water will be completed by divers. The applicants are proposing to repair the 42 piles at a rate of about 14 piles per year. No changes are proposed to the size, configuration, or use of the structures. Project plans are included as **Exhibit 3 & 4**.

The implementation of the newly proposed repairs is anticipated to occur over the course of three (3) years. According to the applicant, the need to extend the construction period over an extended length of time is budget based. Therefore, staff is recommending **Special Condition 3** limiting this permit term to a three (3) year duration period from the date of the permit is approved by the Commission. Any changes to the permit would require approval by the Executive Director; for requests for extension of time, the applicant must also return to the Commission for review and approval.

As part of the proposed project, the applicants are also proposing a docent program that will offer free public tours of the Tuna Club facility 8-10 times a year with no entrance fee.

The subject site is the Tuna Club of Santa Catalina Island (“Tuna Club”), which is on a pier located at 100 Saint Catherine Way in the City of Avalon, Los Angeles County (**Exhibit 1 & 2**). The subject site is located on the Avalon Bay waterfront (the Crescent) between downtown Avalon and Casino Point. The Tuna Club facility is comprised of a two-story clubhouse and a 45 ft. by 45 ft. square porch on the bay side. The facility occupies the entire pier area. The shoreline at the foot of the pier is comprised of a vertical seawall, which is protected by a rock revetment. The proposed project consists of repair and maintenance to the pier pilings that support the over-water Tuna Club facility, which spans approximately 90 ft. along and 60 ft. seaward of the seawall. The Tuna Club facility was constructed and built on a pile foundation over the tidelands of Avalon Bay in 1916. The Tuna Club facility is listed in the National Register of Historic Places, as well as the California Historical Landmarks in Los Angeles County. In 1963, the California State Lands Commission granted the City of Avalon ownership over the tidelands in this area. Therefore, the City (co-applicant) owns the pier and leases it to the Tuna Club. Although the City of Avalon has a certified Local Coastal Program (1981), a coastal development permit is required from the Commission for the proposed development because it is located within the Commission's area of original jurisdiction.

B. BIOLOGICAL ASSESSMENT

The Coastal Act contains policies that address development in or near coastal waters. The proposed project is located in and over the coastal waters of Avalon Bay (**Exhibit 2**). The standard of review for development proposed in coastal waters is the Chapter 3 policies of the Coastal Act, including the following marine resource policies.

Sections 30230 and 30231 of the Coastal Act require that marine resources and the biological productivity of coastal water be maintained and enhanced.

Section 30230 of the Coastal Act states:

Marine resources shall be maintained, enhanced, and where feasible, restored. Special protection shall be given to areas and species of special biological or economic significance. Uses of the marine environment shall be carried out in a manner that will sustain the biological productivity of coastal waters and that will maintain healthy populations of all species of marine organisms adequate for long-term commercial, recreational, scientific, and educational purposes.

Section 30231 of the Coastal Act states:

The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface water flow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.

Section 30230 of the Coastal Act requires that marine resources including biological productivity be protected. Section 30231 of the Coastal Act requires that the biological productivity of coastal waters be maintained, and where feasible, restored. In addition, Sections 30230 and 30231 require that the quality of coastal waters be maintained and protected from adverse impacts.

The proposed project involves the repair of an existing structure (7,361 sq. ft. pier built in 1916) that is located in coastal waters. An underwater inspection (Jan 2014) was conducted by Moffat & Nichol Blaylock to examine the condition of the pier supporting the Tuna Club facility and deck. Significant damage was found on several piles due to marine borers, failed concrete encasements, and dry rot. In addition, as a result of August 2014 Hurricane Marie, large swells, and high tides during December 2014 Santa Ana winds, the damage to the piles was exacerbated.

The total existing number of pier piles is not proposed to be increased over the currently existing 118 piles (**Exhibit 3**). The applicants are requesting the permanent authorization for the replacement of two missing piles and repair of four damaged piles (out of total 118 piles that support the Tuna Club facility) approved under Emergency Permit No. G-5-15-0003, and for repair of an additional 12 degraded piles with 50% or more of section loss under Emergency Permit No. G-5-16-0068. The emergency work under Emergency Permit No. G-5-15-0003 also consists of: the removal and replacement of one 16 sq. ft. concrete footing; and encasements of the four damaged piles. The pile work under Emergency Permit No. G-5-16-0068 consists of pile repair using a “splice” method, whereby the portions of existing 14-in. diameter piles will be replaced above the scour line with 12-in. diameter ACZA treated wood while retaining the existing foundation/footing for each pile. The reduced diameter will allow for the wrapping of the ACZA treated wood without result in new fill. The ACZA treated wood will be wrapped and sealed from saltwater intrusion (preventing direct contact with the marine environment) using material such as high-density polyethylene (HDPE), which is consistent with the specification of the American Wood Preservation Association for saltwater use.

The proposed project also includes additional repair over a 3-year period of an additional 42, 14-in. diameter piles also using the “splice” method described above. Project plan is included as **Exhibit 4**. No pile driving or excavation is proposed. Pile work will be completed at low/extreme low tidal conditions; pile work in deeper water will be completed by divers. No changes are proposed to the size, configuration, or use of the structures. The applicants propose to hand-carry and collect any debris, including damaged sections of removed timber, and dispose of it at an approved legal landfill.

The applicants indicate that the proposed project is the least environmentally damaging feasible alternative. Section 30108 of the Coastal Act states that “feasible” means cable of being accomplished in a successfully manner within a reasonable period of time, taking into account,

economic, environmental, social and technological factors. Alternative methods of pile repair considered were: (1) “no project” alternative and (2) new pile encasements and replacement footings. The “no project” alternative would result in the continued degradation of the structure, posing a potential threat to human health and safety and eventual loss of an historical element of Catalina Island. Under the second alternative, the encasement repair method would result in an increase of in diameter of each pile by 2-4 inches, and the replacement footings would result in a cumulative and more significant increase in fill than the proposed project. The proposed repair method is the preferred alternative and is the minimum necessary and least environmentally damaging practicable alternative that would restore the structural integrity of the pier. Moreover, construction of a new waterside facility would incur significantly greater environmental impacts than the proposed repair of the existing historic structure.

Storage or placement of construction materials, debris, or waste in a location subject to erosion and dispersion or which may be discharged into coastal water via rain or wind would result in adverse impacts upon the marine environment that would reduce the biological productivity of coastal waters. For instance, construction debris entering coastal waters may cover and displace soft bottom habitat. Although the proposed repair is located in an intertidal area beneath the structure, the proposed project will not result in any significant adverse impact to marine resources or water quality. For instance, construction best management practices would be implemented to avoid or minimize impacts to the environment. Moreover, construction noise impacts would be negligible, as impact pile driving is not proposed. Waters adjacent to the project site are frequented by motor-powered vessels, and it is anticipated that tools and construction equipment needed for the proposed repairs would generate negligible increases in ambient noise levels. In order to ensure prevention of adverse construction-related impacts upon marine resources, the Commission imposes **Special Condition 9** requiring the applicant to implement construction best management practices and **Special Condition 10** requiring the applicant to dispose of all demolition and construction debris at an appropriate location outside the coastal zone.

Additionally, the proposed repairs are not anticipated to have any impact to eelgrass although there may be eelgrass beds that exist in the vicinity of the proposed project. Eelgrass (*Zostera marina*) is a flowering marine plant that grows on mud and sand bottoms. Bottom areas vegetated with eelgrass are important because they are refuges, foraging centers, and nursery habitats for many types of coastal and bay invertebrates and fishes, many of which are fished commercially and recreationally. Eelgrass is also recognized as a key food source for certain shorebirds. Eelgrass beds are the type of habitat area that, pursuant to Section 30230 of the Coastal Act, deserves special protection as an area of special biological significance. The National Marine Fisheries Service Eelgrass Mitigation Policy (October 2014) states the following:

Eelgrass species (Zostera marina L. and Z. pacifica) are seagrasses that occur in the temperate unconsolidated substrate of shallow coastal environments, enclosed bays, and estuaries. Eelgrass is a highly productive species and is considered to be a "foundation" or habitat forming species. Eelgrass contributes to ecosystem functions at multiple levels as a primary and secondary producer, as a habitat structuring element, as a substrate for epiphytes and epifauna, and as sediment stabilizer and nutrient cycling facilitator. Eelgrass provides important foraging areas and shelter to young fish and invertebrates, food for migratory waterfowl and sea turtles, and spawning surfaces for invertebrates and fish such as the Pacific herring. Eelgrass also provides a significant source of carbon to the detrital pool which provides

important organic matter in sometimes food-limited environments (e.g., submarine canyons). In addition, eelgrass has the capacity to sequester carbon in the underlying sediments and may help offset carbon emissions. Given the significance and diversity of the functions and services provided by seagrass, Costanza et al. (2007) determined seagrass ecosystems to be one of Earth's most valuable.

The NMFS policy also reports the following adverse effects of human development on eelgrass beds like those in the vicinity of the subject site:

Seagrass habitat has been lost from temperate estuaries worldwide (Duarte 2002, Lotze et al. 2006, Orth et al. 2006). While both natural and human-induced mechanisms have contributed to these losses, impacts from human population expansion and associated pollution and upland development is the primary cause (Short and Wyllie-Echeverria 1996). Human activities that affect eelgrass habitat distribution and abundance, including, but not limited to, urban development, harbor development, aquaculture, agricultural runoff, effluent discharges, and upland land use associated sediment discharge (Duarte 2008) occur throughout California. For example, dredging and filling; shading and alteration of circulation patterns; and watershed inputs of sediment, nutrients, and unnaturally concentrated or directed freshwater flows can directly and indirectly destroy eelgrass habitats.

The eelgrass survey performed by Professional Ecological Sampling Consultants International (PESCI) on October 11, 2014 did not identify eelgrass at the site. However if eelgrass beds do exist under or near the subject pier, the proposed project could negatively affect this marine habitat. The eelgrass survey took place in October 2014 and eelgrass surveys completed during the active growth phase of eelgrass (typically March through October) are valid for 60-days with the exception of surveys completed in August-October. A survey completed in August - October shall be valid until the resumption of active growth (i.e., March 1). The project is agendized for the December 2016 Coastal Commission Hearing so the eelgrass survey no longer continues to be valid. Therefore, a subsequent eelgrass survey will be required prior to beginning any construction. In order to avoid any impacts to eelgrass, which would adversely affect biological productivity in the marine environment, the Commission imposes **Special Condition 7**, which requires a pre-construction eelgrass survey and identifies reporting requirements prior to construction. In addition, the special condition identifies post-construction eelgrass procedures. Therefore, as conditioned, the Commission finds that the proposed development will not result in significant impacts to eelgrass.

Caulerpa taxifolia is a type of seaweed which has been identified as a threat to California's coastal marine environment because it has the ability to displace native aquatic plant species and habitats. Information available from the National Marine Fisheries Service indicates that *Caulerpa taxifolia* can grow in large monotypic stands within which no native aquatic plant species can co-exist. Therefore, native seaweeds, seagrasses, and kelp forests can be displaced by the invasive *Caulerpa taxifolia*. This displacement of native aquatic plant species can adversely impact marine biodiversity with associated impacts upon fishing, recreational diving, and tourism. *Caulerpa taxifolia* is known to grow on rock, sand, or mud substrates in both shallow and deep water areas.

A pre-construction *Caulerpa taxifolia* survey was also completed on October 11, 2014. *Caulerpa taxifolia* surveys are valid for 90 days. The project is agendized for the December 2016 Coastal

Commission Hearing and by this time the *Caulerpa taxifolia* survey would not continue to be valid since 90-days have passed since the survey was completed. Thus, an up-to-date *Caulerpa taxifolia* survey must be conducted prior to commencement of the project. Therefore, the Commission imposes **Special Condition 8**, which identifies the procedures necessary to be completed prior to beginning any construction. Also, if any *Caulerpa taxifolia* is found on the project site, Special Conditions 8 identifies the procedures necessary to be completed prior to beginning any construction.

To ensure the proposed project will not result in any significant adverse impact to marine resources or water quality, **Special Condition 11** requires that any wood treatment used shall conform with the specifications of the American Wood Preservation Association for saltwater use, wood treated with Creosote, CCA (Chromated Copper Arsenate), or ACA (Ammoniacal Copper Arsenate) is prohibited, all treated timber shall be free of chromium and arsenic, and no wood treated with ACZA (Ammoniacal Copper Zinc Arsenate) shall be used where it could come into direct contact with the water.

The U.S. Army Corps of Engineers (USACE) has issued a Provisional Letter of Permission (No. SPL-2015-00073-PKK) for the proposed project. This Commission-issued coastal development permit will serve as the necessary Federal Consistency review. The Regional Water Quality Control Board (RWQB) has issued a Technically Conditioned Water Quality Certification No. 15-069 and has determined that the proposed project will not adversely impact water quality if standard construction methods and materials are used. **Special Condition 13** requires the applicant to comply with all requirements from USACE and RWQB with respect to preservation and protection of water quality and the marine environment. Any change in the approved project that may be required by the above-stated agencies shall be submitted to the Executive Director in order to determine whether the proposed change shall require a permit amendment pursuant to the requirements of the Coastal Act and the California Code of Regulations.

The proposed repair of 42 existing piles will be divided into phases with only about 14 piles repaired per annum over a 3 year period. To ensure that the proposed repair/maintenance work in a one year period meets the requirements of this coastal development permit (i.e., would result in no or less than minimal environmental impact), **Special Condition 3** requires that prior to the start of the maintenance period the applicant submit to the Executive Director a detailed Annual Routine Maintenance Activities Report providing site specific information such as schedule of work, maintenance access and staging plans and equipment; and habitat surveys if any habitat/vegetation has developed at the site over time and there is a risk of adverse impact by the specific type of maintenance proposed at that particular site. The Annual Routine Maintenance Activities Report and reconnaissance surveys would be public documents available for review by the public or any interested parties. The proposed maintenance activities will be deemed approved if staff does not respond within 60 days of submittal of the Annual Maintenance Activities Report.

The special conditions of approval adequately address any potential adverse impacts to the marine environment cause by the proposed project. Therefore, as conditioned, the proposed project is consistent with the marine resource policies of the Coastal Act.

C. PUBLIC ACCESS AND RECREATION

One of the basic goals stated in the Coastal Act is to maximize public access and recreation along the coast. Pursuant to Section 30604(c) of the Coastal Act, because the proposed development is

5-15-0591 (Tuna Club)

located between the first public road and the sea, the proposed project must be found consistent with the public access and recreation policies contained in Chapter 3 of the Coastal Act. The proposed project is consistent with the following Coastal Act policies which encourage public access and recreational use of coastal areas.

Section 30210 of the Coastal Act states:

In carrying out the requirement of Section 4 of Article X of the California Constitution, maximum access, which shall be conspicuously posted, and recreational opportunities shall be provided for all the people consistent with public safety needs and the need to protect public rights, rights of private property owners, and natural resource areas from overuse.

Section 30213 of the Coastal Act states:

Lower cost visitor and recreational facilities shall be protected, encouraged, and, where feasible, provided. Developments providing public recreational opportunities are preferred.

Section 30220 of the Coastal Act states:

Coastal areas suited for water-oriented recreational activities that cannot readily be provided at inland water areas shall be protected for such uses.

Section 30221 of the Coastal Act states:

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

The proposed project includes the repair of support piles of an existing pier, which occupies State tidelands and submerged lands. The pier supporting Tuna Club facility, constructed circa 1916, is currently owned by the City of Avalon. The proposed project will not change the current private use of the facility but will increase public access and recreational opportunities.

The Tuna Club is a private facility that provides limited recreational opportunities to the general public. The Tuna Club hosts community events and community groups such as the Catalina Island Museum Tours, Avalon High School Student Tours, and Catalina Island Woman's Forum.

As part of the proposed project, the Tuna Club is proposing a docent program that will offer public tours of the Tuna Club facility 8-10 times a year. Tuna Club is proposing both virtual and in-person public guided tours of the facility and will offer unlimited scheduled visitation to academics and preservationists. In-person tours will be scheduled during normal business hours that do not conflict with Tuna Club or community events. The facility virtual tour will be available on the Tuna Club website once completed.

The Commission finds that the proposed project will result in improved public recreation opportunities within Avalon Bay to offset the continued private use of the underlying State

tidelands by private club uses, consistent with the public access and recreation policies of the Coastal Act. In addition, the City of Avalon Local Coastal Program (LCP) lists the Tuna club as a structure of historical significance, and indicates that in approving any nearby development, the Commission should take necessary steps to insure that public's enjoyment of this structure is protected. Although the LCP is not the standard of review, it can provide guidance; here, the Commission's prior certification of the LCP, including the policy to retain the Tuna Club, supports the retention and repair of the Tuna Club. The Commission imposes **Special Condition 4** to ensure that the public amenities are provided such as the proposed docent program and require at least 10 public tour dates per year.

Regarding the proposed repair to pier piles, the applicant is not permitted to block public pedestrian access along the public boardwalk that passes in front of the project site as it parallels the shoreline of Avalon Bay. Construction staging would occur on the pier structure itself in addition to minor staging in the uplands in compliance and coordination with the City of Avalon. Therefore, staff is recommending **Special Condition 3** requiring the applicants to submit a staging plan prior to commencement of any repair/maintenance work for the review and approval of the Executive Director to ensure public access is protected.

The applicants are proposing to repair about 14 piles per year over a three-year period. According to the applicants, the need to extend the construction period over an extended length of time is budget based, and it also avoids physical disturbance during busy summer months. Based on 14 piles per year, repairing the proposed 42 piles is anticipated to take three years, which is the term of this permit pursuant to the limitation set forth in Special Condition 3. If additional time is required, or the number of piles in need of repair changes, the applicants may apply for a permit amendment.

Repair of the pier pilings will serve to prolong the access-restrictive conditions over the life of the development because it will encourage continued membership of the Tuna Club and the members' ongoing use of the existing development over public trust submerged and tide lands. The Tuna Club indicated that the club membership includes women and minorities and that the sole criteria for membership are superior citizenship, an ability to pay dues and charges, and skill in angling fishing since the Tuna Club is an angling club.

To ensure maximum access to state tidelands subject to the public trust, the Commission imposes **Special Condition 5**, which requires the applicant to submit its bylaws, or an amendment to its bylaws if necessary, that expressly provides that it will not discriminate on the basis of race, national origin, ethnic group identification, religion, age, sex, sexual orientation, color, genetic information, in its membership, activities or operations; this condition is consistent with past Commission action for private clubs on public trust lands.

In addition, **Special Condition 12** protects any public rights that may exist on the property. The Coastal Commission's approval of this coastal development permit shall not constitute a waiver of public rights that may exist on the property, and the permittees shall not use this coastal development permit as evidence of a waiver of any public rights that may exist on the property.

The Commission finds that the proposed development, as conditioned, is consistent with 30210, 30220, 30221, 30222, and the other public access and recreation policies of the Coastal Act.

D. HAZARDS

Section 30235 of the Coastal Act states:

Revetments, breakwaters, groins, harbor channels, seawalls, cliff retaining walls, and other such construction that alters natural shoreline processes shall be permitted when required to serve coastal dependent uses or to protect existing structures or public beaches in danger from erosion, and when designed to eliminate or mitigate adverse impacts on local shoreline sand supply. Existing marine structures causing water stagnation contributing to pollution problems and fishkills should be phased out or upgraded where feasible.

Section 30253 of the Coastal Act states, in pertinent part:

New development shall do all of the following:

- (a) Minimize risks to life and property in areas of high geologic, flood, and fire hazard.*
- (b) Assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs.*

Section 30255 of the Coastal Act states:

Coastal-dependent developments shall have priority over other developments on or near the shoreline. Except as provided elsewhere in this division, coastal-dependent developments shall not be sited in a wetland. When appropriate, coastal-related developments should be accommodated in close proximity to the coastal dependent uses they support.

Development located in or near the ocean has the potential for damage caused by wave energy, flooding, seismic events, storms, and erosion. The proposed project site (pier supporting the over-water Tuna Club facility) is located within Avalon Bay, which is tidally influenced by the Pacific Ocean, and is susceptible to coastal hazards. The pier spans approximately 90 ft. along the bulkhead and 60 ft. seaward into Avalon Bay. The proposed project includes the repair of existing pier piles. The proposed project will not create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs. However, no development in the water can be guaranteed to be safe from hazard.

The applicants are proposing to repair existing piles and are not proposing to change the elevation of the existing pier, which consists of a clubhouse deck and porch deck. The applicants completed a Coastal Hazards Analysis to assess how the proposed design will fare under current conditions and future sea level rise scenarios during the pilings' expected design life. The study identifies the design life for timber piers to be approximately 20-30 years in a marine coastal environment before maintenance is required. According to the study, the site is subject to high tides, wave rush-up, and storm impacts. Storms are expected to primarily come from Pacific Ocean on the west side of

Catalina Island, and effect of such storms will be minimal due to Avalon Bay being on the leeway side of the island.

Using the sea level rise projections provided by the 2012 National Research Council's Sea-Level Rise for the Coasts of California, Oregon and Washington: Past, Present and Future, the upper range of sea level by 2046 could rise up to 17.1 inches, and the existing astronomical high tide based on the Los Angeles Tide Gauge would increase from +6.7 feet mean lower to low water (MLLW) to +8.1 feet MLLW. Currently the clubhouse deck is at an elevation of +12 feet MLLW, and the porch deck is at an elevation of +9 MLLW. It is indicated that under the existing astronomical high tide, the water line is generally more than 2 feet below the porch deck and well below the clubhouse deck. However, with SLR, the wave crest could reach a height of +11.2 feet MLLW. Therefore, the lower part of the pier, or porch deck, may be subject to more frequent wave overtopping, but not the clubhouse deck. The study concludes that the water levels and SLR are not expected to impact the piles beyond typical wear in the coastal environment.

The existing pier has sustained damage in recent years from storm surge and higher tides, including missing and degraded piles. Further damage to the support piles could result in the collapse of the pier and structures above. No changes to existing structures above the decks are currently proposed, and the proposed development subject to 5-15-0591 is limited to maintenance of a portion of the piles under the pier.

There are scenarios beyond the next 30 years in which water levels would exceed the elevation of the pier at the project site and could result in future flooding of the Tuna Club building. Recognizing that a higher water line and wave conditions exacerbated by sea level rise or other coastal hazards may damage the proposed development, the Commission imposes **Special Condition 6** which requires that the applicants acknowledge and assume the potential hazards associated with development in or near the water, waive liability against the Commission, and indemnify the Commission against future claims. In addition, prior to issuance of the coastal development permit, the applicants shall submit a copy of written agreement by the Tuna Club and the City of Avalon, in a form and content acceptable to the Executive Director.

In order to ensure that development on the site does not occur which could result in adverse impacts to coastal processes, the Commission imposes **Special Condition 1**, which requires the applicant to undertake development in accordance with the approved final plans. Any proposed changes to the approved final plans shall be reported to the Executive Director. No changes to the approved final plans shall occur without a Commission-approved amendment to this Coastal Development Permit unless the Executive Director determines that no amendment is legally required.

As conditioned, the Commission finds that the development conforms to the requirements of Sections 30235, 30253, and 30255 of the Coastal Act regarding the siting of coastal-dependent and coastal-related development in hazardous locations.

E. VISUAL RESOURCES

Section 30251 of the Coastal Act states:

The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural

land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas. New development in highly scenic areas such as those designated in the California Coastline Preservation and Recreation Plan prepared by the Department of Parks and Recreation and by local government shall be subordinate to the character of its setting.

Section 30253 states that new development shall:

(5) where appropriate, protect special communities and neighborhoods which, because of their unique characteristics, are popular visitor destination points for recreational uses.

The proposed project is located on/within the water in the western portion of Avalon Bay. The proposed project includes repair of existing pier piles, timber utility hangers, and one brace connection. The proposed pile work is mostly limited to pile repair using a “splice” method, whereby the portions of existing 14-in. diameter piles will be replaced above the scour line with 12-in. diameter ACZA treated wood (to be wrapped) while retaining the existing foundation/footing for each pile. The proposed repairs will not result in the piles rising further above the waterline. No additional over-water structures are proposed, and no increase in the number of existing support piles (118 piles) is proposed.

The applicants are also proposing to repaint the above-water structures (Tuna Club building) in same historically approved color scheme for aesthetic preservation.

As proposed, the project will improve the visual aesthetics of the bay and will not adversely impact views of the bay. The Commission, therefore, finds that the proposed project is consistent with the visual resource protection policies of the Coastal Act and with the County’s Local Coastal Program.

F. LOCAL COASTAL PROGRAM

Section 30604(a) of the Coastal Act provides that the Commission shall issue a coastal permit only if the project will not prejudice the ability of the local government having jurisdiction to prepare a Local Coastal Program (LCP) which conforms with Chapter 3 policies of the Coastal Act. However, this provision is inapplicable here because the Commission certified the City of Avalon’s Local Coastal Program (LCP) on May 21, 1981, and the Commission is issuing a coastal development permit due to the project’s location in an area of the Commission’s retained jurisdiction.

The Commission's standard of review for the proposed development is the Chapter 3 policies of the Coastal Act. The City of Avalon certified LCP is advisory in nature and may provide guidance. As conditioned, the proposed development is consistent with Chapter 3 of the Coastal Act and does not conflict with the certified LCP.

G. CALIFORNIA ENVIRONMENTAL QUALITY ACT

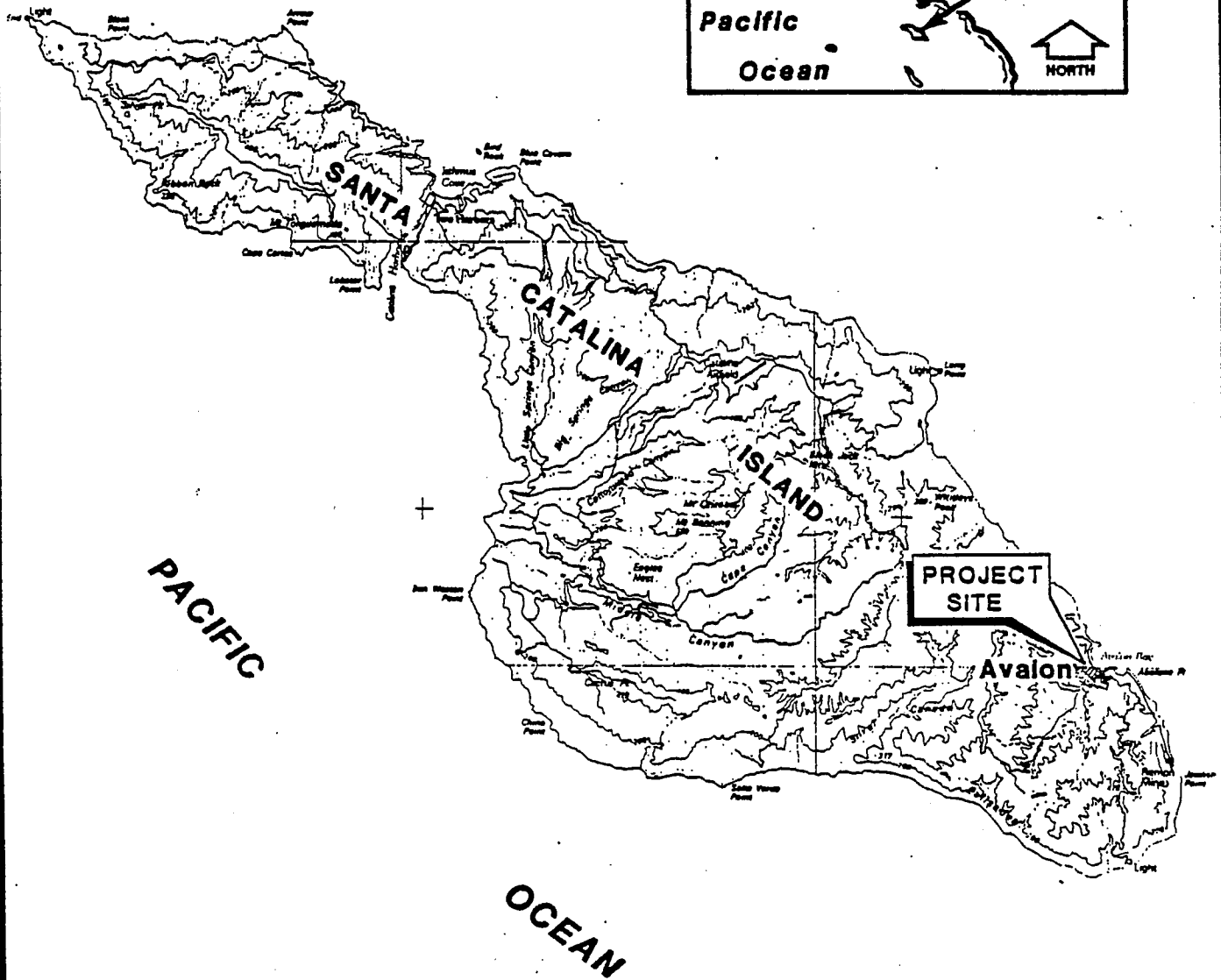
Section 13096 of the California Code of Regulations requires Commission approval of coastal development permit applications to be supported by a finding showing the application, as conditioned by any conditions of approval, to be consistent with any applicable requirements of the California Environmental Quality Act (CEQA). Pursuant to Section 21080.5, the Secretary of the Resources Agency has certified the Commission’s CDP program as being the functional equivalent of CEQA review, thereby allowing the Commission to use its permit approval process in lieu of an environmental impact report or negative declaration. 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 development, as conditioned, is consistent with the Chapter 3 policies of the Coastal Act. Special Conditions imposed will mitigate adverse impacts to coastal resources and public access. The **Special Conditions** address the following issues: **1)** submit final plans prior to the issuance of the permit and undertake development in accordance with the approved final plans; **2)** duration of permit; **3)** submit annual maintenance activities report; **4)** submit docent program and signage plan; **5)** submit a statement of non-discrimination; **6)** assume the risks of the development, waive liability against the Commission, and indemnify the Commission against future claims; **7)** carry out pre-construction and post-construction eelgrass surveys and provide eelgrass mitigation consistent with the California Eelgrass Mitigation Policy if the post-construction survey identifies an adverse impact to eelgrass; **8)** carry out a pre-construction *Caulerpa taxifolia* survey; **9)** implement construction best management practices; **10)** dispose of all demolition and construction debris at an appropriate location; **11)** install piles consistent with material requirements; **12)** protect public rights; and **13)** comply with the requirements of the resource agencies. The Commission also analyzed various alternatives for the project but determined that they were either infeasible or would have greater environmental impacts. Therefore, the Commission finds that, as conditioned, there are no feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse effect of the proposed project, there are no remaining significant environmental impacts within the meaning of CEQA, and that the project is consistent with CEQA and the policies of the Coastal Act.

Appendix A - Substantive File Documents

- Los Angeles County Santa Catalina Island certified Local Coastal Program (LCP), January 9, 1990.
- Lease Agreement between the Tuna Club of Santa Catalina Island & City of Avalon
- U.S. Army Corps of Engineers Provisional Letter of Permission, Project No. SPL-2015-00073-PKK.
- Regional Water Quality Control Board Technically Conditioned Water Quality Certification; Project No. 15-069.
- Evaluation of Coastal Hazards for Tuna Club. Anchor QEA; September 16, 2015.

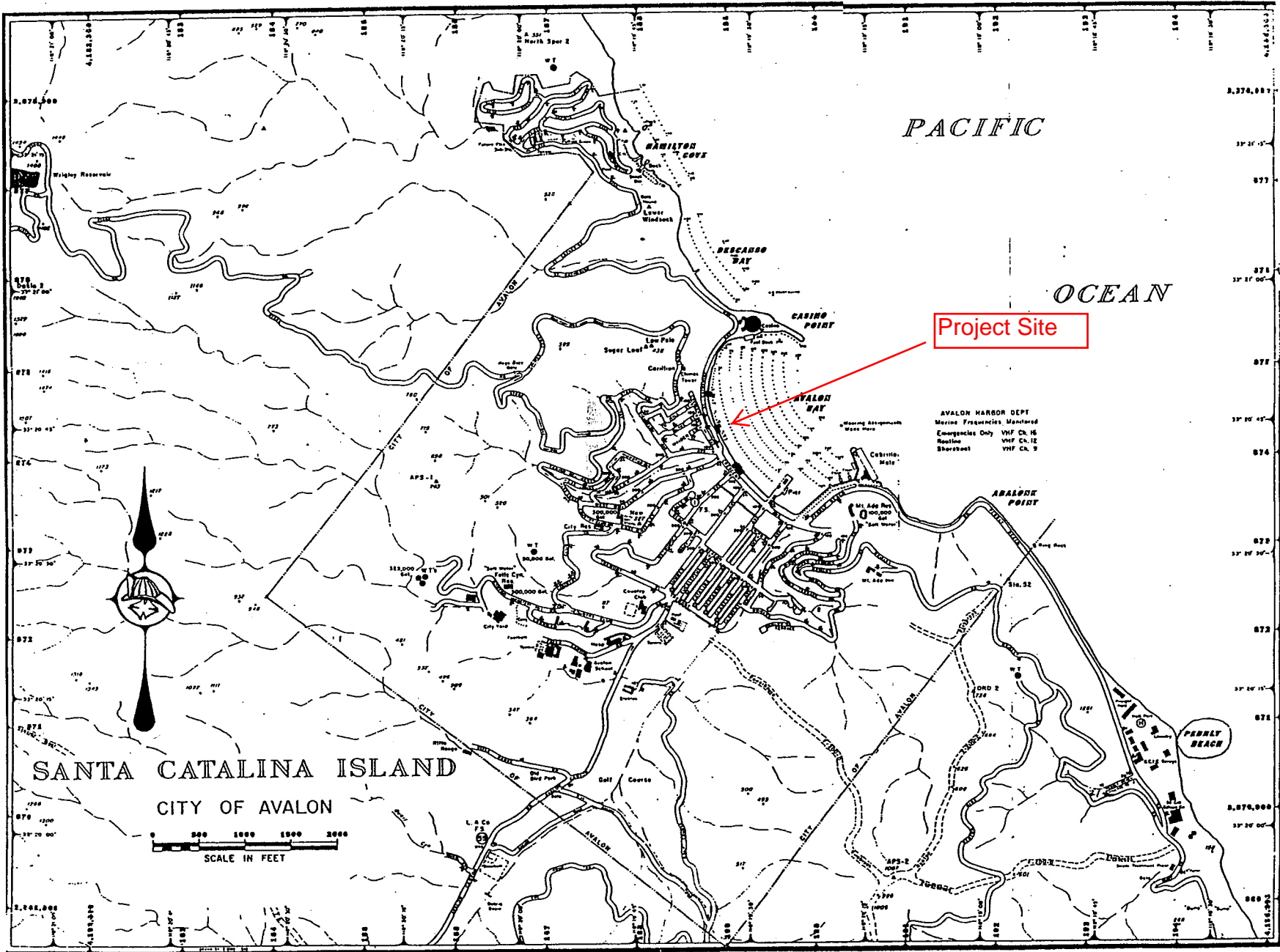


COASTAL COMMISSION

REGIONAL LOCATION MAP

EXHIBIT # 1
 PAGE 1 OF 2

SOURCE: USGS Santa Catalina Island, CA Quad, 1981.



COASTAL COMMISSION

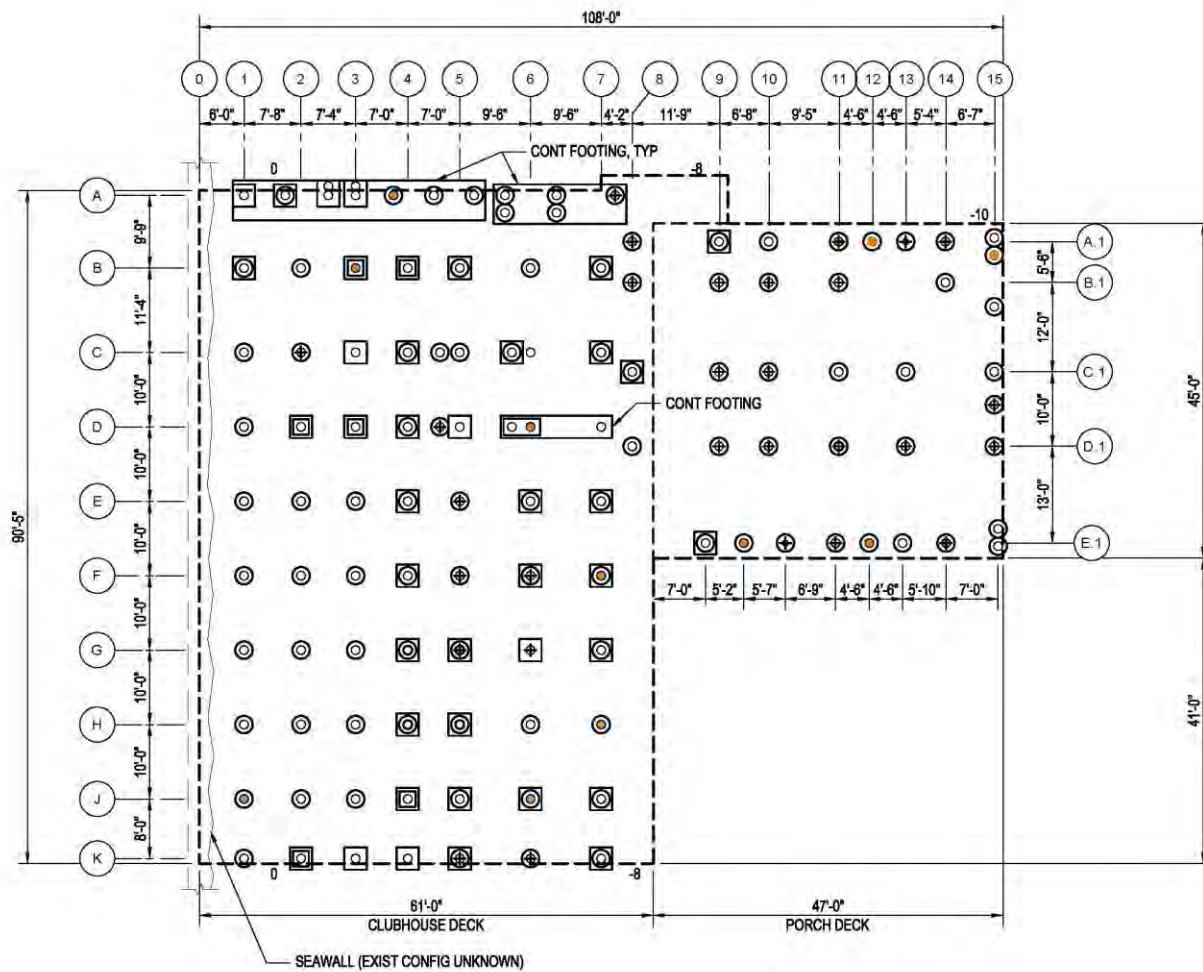


COASTAL COMMISSION

EXHIBIT # 2
PAGE 1 OF 1

COASTAL COMMISSION

EXHIBIT # 3
 PAGE 1 OF 1

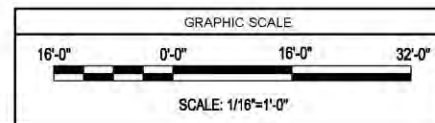


LEGEND:

- INDICATES TIMBER PILE
- INDICATES PILE W/ SQ CONC ENCASEMENT OR FOUNDATION
- ⊙ INDICATES PILE W/ ROUND CONC ENCASEMENT
- ⊗ INDICATES PILE W/ SQ AND ROUND CONC ENCASEMENT
- ⊠ INDICATES PILE W/ SQ CONC ENCASEMENT AND SQ FOUNDATION
- ⊕ INDICATES PILE W/ PLASTIC WRAP
- ⦿ INDICATES TIMBER PILE W/ 50% OR MORE SECTION LOSS

NOTES:

1. DIMENSIONS SHOWN ARE APPROXIMATE.
2. ELEV. SHOWN ARE APPROXIMATE AND ARE GIVEN IN RESPECT TO MLLW.



DATE
FEB 2014



WATERFRONT FACILITIES INSPECTION
 AVALON TUNA CLUB
 AVALON, CA

PILE PLAN

FIG. NO.
2

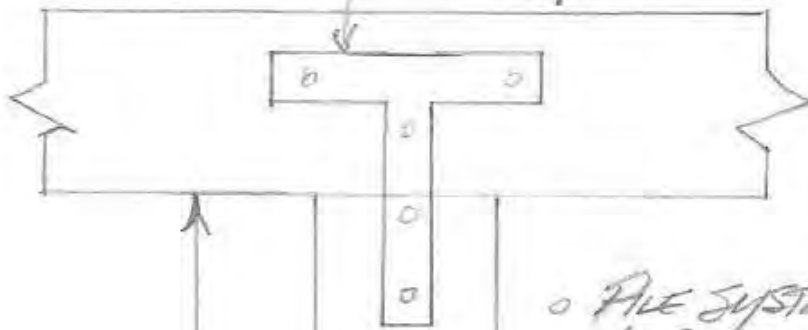
\\g:\LAYOUT NAME: PILE PLAN_PLOTTED Friday, February 14, 2014 4:12pm USER: ajmrc/abc

Figure 2

TUNA CLUB PILE POSTING REPAIR

GALV. "T" STRAP

EXISTING PILE CAP



o PILE SYSTEM TO BE WRAPPED & SEALED FROM SALTWATER INTRUSION

VARIES

ACZA

New 12" ϕ CCA TREATED PILE

1 1/2" ϕ GALV. DRAFT PIN

EXISTING 14" ϕ PILE

NOT TO SCALE

COASTAL COMMISSION

EXHIBIT # 4

PAGE 1 OF 1

Figure 6