

CALIFORNIA COASTAL COMMISSION

NORTH CENTRAL COAST DISTRICT
455 MARKET STREET, SUITE 300
SAN FRANCISCO, CA 94105
PHONE: (415) 904-5260
FAX: (415) 904-5400
WEB: WWW.COASTAL.CA.GOV



F16

Prepared October 1, 2021 (for October 15, 2021 Hearing)

To: Coastal Commissioners and Interested Persons

From: Dan Carl, North Central Coast District Director

Subject: North Central Coast District Director's Report for October 2021

The following coastal development permit (CDP) waivers, immaterial CDP amendments, immaterial CDP extensions, and emergency CDPs for the North Central Coast District Office are being reported to the Commission on October 15, 2021. Pursuant to the Commission's procedures, each item has been appropriately noticed as required, and each item is also available for review at the Commission's North Central Coast District Office in San Francisco. Staff is asking for the Commission's concurrence on the items in the North Central Coast District Director's Report, and will report any objections received and any other relevant information on these items to the Commission when it considers the Report on October 15th during the virtual online hearing.

With respect to the October 15th hearing, interested persons may sign up to address the Commission on items contained in this Report prior to the Commission's consideration of the Report. The Commission can overturn staff's noticed determinations for some categories of items subject to certain criteria in each case (see individual notices for specific requirements).

Items being reported on October 15, 2021 (see attached)

CDP Waivers

- 2-21-0329-W, 297 Seadrift Road Single-Family Residence (Stinson Beach)
- 2-21-0331-W, Mavericks Ventures LLC Surf Event (Princeton-by-the-Sea)
- 2-21-0580-W, San Mateo County Harbor District Life Ring Buoy Stations (Pillar Point Harbor)

Emergency CDPs

- G-2-21-0030, City of Daly City Mussel Rock Landfill Gabion Wall Maintenance (Daly City)

CDP Extensions – None

CDP Amendments

- 2-20-0018-A1, Dillon Beach Resort, LLC Park Model Units (Dillon Beach)

CALIFORNIA COASTAL COMMISSION

NORTH CENTRAL COAST DISTRICT OFFICE
455 MARKET STREET, SUITE 300
SAN FRANCISCO, CA 94105
PHONE: (415) 904-5260
FAX: (415) 904-5400
WEB: WWW.COASTAL.CA.GOV



NOTICE OF PROPOSED PERMIT WAIVER

Date: September 24, 2021
To: All Interested Parties
From: Stephanie Rexing, North Central Coast District Manager
Sara Pfeifer, North Central Coast Coastal Planner
Subject: Coastal Development Permit (CDP) Waiver 2-21-0329-W
Applicant: Loren Quaglieri and Scott Grooms

Proposed Development

Remodel of an existing 1,795 square-foot single-family residence, including a 452 square-foot addition, a new roof with solar panels, replacement of outdoor decking and landscaping, and a new septic system at 297 Seadrift Road, adjacent to the Seadrift Lagoon in Stinson Beach, Marin County.

Executive Director's Waiver Determination

Pursuant to Title 14, Section 13250 of the California Code of Regulations, and based on project plans and information submitted by the Applicant regarding the proposed development, the Executive Director of the California Coastal Commission waives the requirement for a CDP for the following reasons:

The proposed project will not have significant adverse impacts on coastal resources, including on public views and water quality/marine resources, and it accounts for potential coastal hazards risks. Specifically, the development is not readily visible from public vantage points, and otherwise blends into surrounding, similar residential development in the area. It also incorporates construction best management practices similar to Commission requirements applied to projects in similar settings to protect coastal water quality and marine resources. As to coastal hazards, the project is not located along the immediate shoreline, but rather is located inland adjacent to Seadrift Lagoon (a lagoon that was created as a part of the original Seadrift subdivision that is rimmed by residences) in a similar orientation as the other hundred or so residences that surround the lagoon. Potential hazards here are primarily in terms of potentially rising lagoon levels, and the project includes acknowledgement and disclosure of these coastal hazard issues pertaining to the site, much as has been applied through the Commission's CDP program to many of the nearby homes in similar situations. Overall, the proposed development's siting, design, and scale is similar to and consistent with that of surrounding development, and is consistent with past residential development approved by the Commission in this area. The proposed project should not result in any significant impacts to coastal resources, consistent with the Coastal Act.

Coastal Commission Review Procedure

This waiver is not valid until it has been reported to the Coastal Commission. This waiver is proposed to be reported to the Commission on Friday, October 15, 2021, by way of virtual hearing. If three or more Commissioners object to this waiver at that time, then the application shall be processed as a regular CDP application.

If you have questions about the proposal or wish to register an objection, please contact Sara Pfeifer in the North Central Coast District Office.

CALIFORNIA COASTAL COMMISSION

NORTH CENTRAL COAST DISTRICT OFFICE
455 MARKET STREET, SUITE 300
SAN FRANCISCO, CA 94105
PHONE: (415) 904-5260
FAX: (415) 904-5400
WEB: WWW.COASTAL.CA.GOV



NOTICE OF PROPOSED PERMIT WAIVER

Date: September 24, 2021
To: All Interested Parties
From: Stephanie Rexing, North Central Coast District Manager
Erik Martinez, North Central Coast Coastal Planner
Subject: Coastal Development Permit (CDP) Waiver 2-21-0331-W
Applicant: Mavericks Ventures, LLC

Proposed Development

A one-day, ocean-based surfing event to be held between November 15, 2021 and April 15, 2022, at the Mavericks surf break located offshore of Mavericks Beach, a half-mile north of Pillar Point Harbor, in Princeton-by-the-Sea, unincorporated San Mateo County.

Executive Director's Waiver Determination

Pursuant to Title 14, Section 13238 of the California Code of Regulations, and based on project plans and information submitted by the Applicant regarding the proposed development, the Executive Director of the California Coastal Commission hereby waives the requirement for a CDP for the following reasons:

The proposed event is an invitation-only, gender-equitable, big wave surf competition that will take place on a single day within the requested time period, dependent on wave conditions at the Mavericks surf break offshore of Pillar Point. The proposed event will not require exclusive use of any shoreline, trail or Harbor facilities, which will remain open to the general public. The Applicant will utilize public parking spaces that are available on a first-come-first-served basis, and the public boat launch, to stage and deploy two commercial vessels and 10-12 personal watercrafts to run the proposed event. In order to reduce parking load and potential impacts to public parking, the Applicant will also operate a shuttle service from Zaballa Square in downtown Half Moon Bay for competitors and event organizers/workers. The event will not be publicized to the general public, and is not intended to be a spectator event in that sense. The Applicant will work with the already established 'unified command' for events at this site (i.e., the U.S. Coast Guard, San Mateo County Harbor District, San Mateo Sheriff's Office, San Mateo County Parks, NOAA, and the U.S. Air Force) to develop and implement a plan for safety, parking, traffic control, and pedestrian management, which will be submitted to the Commission's Executive Director for review and approval prior to any event. Final modifications to ensure that coastal resource impacts are not significant can be accommodated through that process.

The proposed project is a popular, water-oriented, recreational event that brings visitors and global interest to the San Mateo coastal community and California, and there is a

great deal of public support for the contest. It has in the past and should continue to serve to increase awareness of the coast and coastal issues, and provide a means of publicizing the shoreline resources that make California famous. As such, it includes an inherent public benefit, especially as regards potential visitors to the California and San Mateo County coasts. In addition, the project Applicant in this case has incorporated all relevant terms and conditions that the Commission has historically placed on CDPs for such events at Mavericks into their project description, so that there is no need for a CDP with conditions to address coastal resource concerns as they are already part of the project by design, including via appropriate Executive Director oversight. Accordingly, the project will avoid significant adverse impacts to coastal resources, including public access, consistent with Coastal Act Chapter 3 and the certified San Mateo County Local Coastal Program.

Coastal Commission Review Procedure

This waiver is not valid until the waiver has been reported to the Coastal Commission. This waiver is proposed to be reported to the Commission on Friday, October 15, 2021. If four or more Commissioners object to this waiver at that time, then the application shall be processed as a regular CDP application.

If you have questions about the proposal or wish to register an objection, please contact Erik Martinez in the North Central Coast District office.

CALIFORNIA COASTAL COMMISSION

NORTH CENTRAL COAST DISTRICT OFFICE
455 MARKET STREET, SUITE 300
SAN FRANCISCO, CA 94105
PHONE: (415) 904-5260
FAX: (415) 904-5400
WEB: WWW.COASTAL.CA.GOV



NOTICE OF PROPOSED PERMIT WAIVER

Date: September 24, 2021
To: All Interested Parties
From: Stephanie Rexing, North Central Coast District Manager
Erik Martinez, North Central Coast Coastal Planner
Subject: Coastal Development Permit (CDP) Waiver 2-21-0580-W
Applicant: San Mateo County Harbor District

Proposed Development

Installation of three emergency life ring buoy stations (LRBSs) within and adjacent to Pillar Point Harbor in unincorporated San Mateo County.

Executive Director's Waiver Determination

Pursuant to Title 14, Section 13238 of the California Code of Regulations, and based on project plans and information submitted by the Applicant regarding the proposed development, the Executive Director of the California Coastal Commission hereby waives the requirement for a CDP for the following reasons:

The proposed LRBSs are intended to be available as a public safety measure in potential drowning situations, and to be utilized by onlookers before first responders arrive on the scene. These types of LRBSs are not uncommon in shoreline recreational areas, and have been used to important effect in other locations (e.g., along West Cliff Drive and near the Steamer Lane surf break in the City of Santa Cruz). The LRBSs would be located near and accessible for rescues from the east and west breakwaters in Pillar Point Harbor, as well as from the Surfer's Beach parking lot, locations where dangerous sneaker waves are likely, and that are commonly used by surfers, pedestrians, and fishermen. Each LRBS consists of a 12-foot tall 4-foot by 6-foot wooden post with attached signage and an emergency life ring inside a heavy-duty, weather-safe case. The posts would be placed in a 3-foot deep, 12-inch diameter hole, excavated by a posthole digger, and would then be backfilled and secured with concrete. The LRBSs are proposed for areas where they will not significantly adversely affect public views or habitat areas, or otherwise adversely impact public access. Of course, they are sited near the shoreline in order to be effective, but the Applicant has gone to great lengths to limit any such impacts as much as possible. For these reasons, the project will avoid significant adverse impacts to coastal resources, including public access, consistent with Coastal Act Chapter 3 and the certified San Mateo County Local Coastal Program.

Coastal Commission Review Procedure

This waiver is not valid until the waiver has been reported to the Coastal Commission.

This waiver is proposed to be reported to the Commission on Friday, October 15, 2021. If four or more Commissioners object to this waiver at that time, then the application shall be processed as a regular CDP application.

If you have questions about the proposal or wish to register an objection, please contact Erik Martinez in the North Central Coast District office.

CALIFORNIA COASTAL COMMISSION

NORTH CENTRAL COAST DISTRICT
455 MARKET STREET, SUITE 300
SAN FRANCISCO, CA 94105
PHONE: (415) 904-5260
FAX: (415) 904-5400
WEB: WWW.COASTAL.CA.GOV

**EMERGENCY PERMIT**

Issue Date: September 21, 2021
Emergency Permit No. G-2-21-0030

APPLICANT:

City of Daly City, Kevin Fehr
333 90th Street, Daly City, CA 94015

LOCATION OF EMERGENCY:

A 300-foot stretch of the gabion wall system in the southern and seaward sections of Mussel Rock Landfill, 120 Westline Drive, Daly City, CA (APN 0008-460-010).

EMERGENCY WORK:

Replacement of 300 feet of the existing gabion retaining walls, and excavation and onsite relocation of 7,316 cubic yards of topsoil and landfill materials behind the gabion walls.

This letter constitutes approval of the emergency work you or your representative has requested to be done at the location listed above. I understand from your information that sloughing of the slope and degradation of the gabion cages has caused the gabion walls to tilt, break, and fall apart, resulting in an unstable and inadequately supported slope with landfill materials buried beneath. If left unaddressed, the current condition of the gabion walls poses potential safety hazards to the public using the below recreational coastal trail and poses a threat to coastal resources if landfill material were to be exposed and/or fall into the ocean. As such, immediate action is required to prevent or mitigate loss or damage to life, health, property or essential public services pursuant to 14 Cal. Admin. Code Section 13009. The Executive Director of the California Coastal Commission hereby finds that:

- (a) An emergency exists that requires action more quickly than permitted by the procedures for administrative or ordinary coastal development permits (CDPs), and that the development can and will be completed within 90 days unless otherwise specified by the terms of this Emergency Permit; and
- (b) Public comment on the proposed emergency development has been reviewed if time allows.

September 21, 2021
Emergency Permit No.: G-2-21-0030

The emergency work is hereby approved, subject to the conditions listed on the attached pages.

DocuSigned by:
Stephanie Rexing

035096250A8E49E...

Stephanie Rexing, North Central Coast District Manager for John Ainsworth, Executive Director

cc: Daly City Planning Department

Enclosures: 1) ECDP Acceptance Form;
2) Regular Permit Application Form

CONDITIONS OF APPROVAL:

1. The enclosed Emergency Coastal Development Permit (ECDP) Acceptance form must be signed by the Permittee (i.e. City of Daly City) and returned to the Coastal Commission's North Central Coast District Office within 15 working days of the issue date of this permit (by October 06, 2021). This ECDP is not valid unless and until the ECDP acceptance form has been received in the North Central Coast District Office.
2. Copies of this ECDP shall be maintained in a conspicuous location at the construction job site at all times, and such copies shall be available for public review on request. All persons involved with the construction shall be briefed on the content and meaning of this ECDP, and the public review requirements applicable to it, prior to commencement of construction.
3. A construction coordinator shall be designated to be contacted during construction should questions arise regarding the construction (in case of both regular inquiries and emergencies), and their contact information (i.e., address, email, phone numbers, etc.) including, at a minimum, a telephone number and email address that will be made available 24 hours a day for the duration of construction, shall be conspicuously posted at the job site where such contact information is readily visible from public viewing areas, along with indication that the construction coordinator should be contacted in the case of questions regarding the construction (in case of both regular inquiries and emergencies). The construction coordinator shall record the contact information (e.g., name, address, email, phone number, etc.) and nature of all complaints received regarding the construction, and shall investigate complaints and take remedial action, if necessary, within 24 hours of receipt of the complaint or inquiry. Within 30 days of completion of construction authorized by this ECDP, the Permittee shall submit the record (of complaints/inquiries and actions taken in response) to the Executive Director.
4. Only that work specifically described in this ECDP and as more specifically described in the Commission's file for the ECDP for the specific property listed above is authorized. The work permitted under this ECDP only allows for the minimum necessary to address the emergency situation at hand. Any additional work or maintenance to the work done pursuant to this ECDP requires separate authorization from the Executive Director. All emergency development shall be limited in scale and scope to that specifically identified in this ECDP.
5. All work shall take place in a time and manner to minimize any potential damages to coastal resources and to minimize impacts to public access. Construction materials, equipment and/or debris shall not be stored where they will or could potentially slide downhill and/or be subject to wave erosion or dispersion. Construction shall be conducted pursuant to rigorous best management practices designed to avoid coastal resource impacts, including at a minimum:
 - i. Construction work and equipment operations shall be conducted as far from coastal waters as feasible;

September 21, 2021
Emergency Permit No.: G-2-21-0030

- ii. Foreign materials (e.g. construction debris, wood preservatives, other chemicals, etc.) shall be prevented from entering coastal waters;
- iii. All best management practices (BMPs) shall be in place prior to the commencement of construction as well as at the end of each work day;
- iv. A containment device shall be placed around all active portions of a construction site where construction materials/scrap or other floatable debris could enter the water. The containment device shall be cleared daily or as often as necessary to prevent accumulation of debris;
- v. All debris discharged into coastal waters shall be removed, immediately (as soon as possible) or by no later than the end of the work day, to the extent feasible;
- vi. The Permittee shall maintain good construction site housekeeping controls and procedures (e.g., clean up all leaks, drips, and other spills immediately; keep materials covered and out of the rain (including covering exposed piles of soil and wastes); dispose of all wastes properly, place trash receptacles on site for that purpose, and cover open trash receptacles during wet weather; remove all construction debris from the project area). The Permittee shall inspect the project area at the completion of the work to ensure that no debris, trash, or construction materials are left at the site or in the adjacent coastal waters;
- vii. The Permittee shall clean public roadway surfaces adjacent to the project site, the off-load site, and staging areas;
- viii. All access points adversely affected by development activities shall be restored to their pre-construction condition or better within three days of completion of construction;
- ix. Construction and removal activities (including but not limited to equipment staging and storage and removal of constructed structures) are prohibited outside of the limits of the designated construction, staging, and storage areas;
- x. Equipment washing, in addition to fueling, and or servicing shall not take place on the beach or in an area adjacent to coastal waters. Work vehicles will be maintained and washed in confined areas specifically designed to control runoff and located more than 100 feet away from the mean high tide line;
- xi. All water quality BMPs to be implemented during construction and their location shall be noted on the project plans. Silt fences or equivalent devices, shall be installed at the perimeter of the staging and equipment areas to prevent construction and removal-related runoff and or sediment from entering adjacent coastal waters, to maximum extent feasible.

September 21, 2021
Emergency Permit No.: G-2-21-0030

- xii. All access ways impacted by construction activities shall be restored to their preconstruction condition or better within three days of completion of construction. Access ways impacted by construction activities shall be clearly marked by signage indicating closure and/or alternate access routes via a map referencing other open and safe public access ways onsite.
 - xiii. The Permittee shall ensure that work crews are briefed on the importance of observing the appropriate precautions and the reporting of any accidental spills. Construction contracts shall contain appropriate penalty provisions, sufficient to offset the cost of retrieving or cleaning up improperly contained foreign materials.
 - xiv. The Permittee shall conduct work during daylight hours. Additional lighting of the marine area is prohibited.
 - xv. The Permittee shall notify planning staff of the Coastal Commission's North Central Coast District Office immediately upon completion of construction and required restoration activities. If planning staff should identify additional reasonable restoration measures, such measures shall be implemented immediately.
6. The work authorized by this ECDP must be completed within 90 days of the issue date of this permit (i.e., by December 20, 2021), and this ECDP shall become null and void at that time.
 7. The Permittee recognizes that the emergency development authorized by this ECDP is considered temporary and is no longer authorized if it is not followed-up by a regular CDP, or incorporated into CDP application 2-11-024 on file with the Commission's North Central Coast District office. A regular CDP will be subject to all of the provisions of the California Coastal Act, would be conditioned accordingly, and may not allow further armoring. These conditions may also include provisions for public access (such as offers to dedicate, easements, in-lieu fees, etc.), reconfiguring the gabion wall, and/or a requirement that a deed restriction be placed on the property assuming liability for damages incurred from storm waves. In addition, any follow-up permit should account for and analyze the impacts of long-term sea level rise and other coastal hazards.
 8. In exercising this ECDP, the Permittee agrees to hold the California Coastal Commission harmless from any liabilities for damage to public or private properties or personal injury that may result from the project.
 9. Within 90 days of completion of construction authorized by this ECDP, the Permittee shall submit site plans and cross sections clearly identifying all development and removal completed under this emergency authorization (comparing any previously permitted condition to both the emergency condition and to the as-built, post-work condition), and a narrative description of all emergency development activities undertaken pursuant to this emergency authorization. Photos showing the project site before the emergency (if available), during emergency project construction

September 21, 2021
Emergency Permit No.: G-2-21-0030

activities, and after the work authorized by this ECDP is complete shall be provided with the site plans and cross sections.

10. This ECDP shall not constitute a waiver of any public rights which may exist on the property. The Permittee shall not use this ECDP as evidence of a waiver of any public rights which may exist on the property.
11. This ECDP does not obviate the need to obtain necessary authorizations and/or permits from other agencies, including but not limited to the California Department of Fish & Wildlife, U.S. Fish & Wildlife, U.S. Army Corps of Engineers, and the California State Lands Commission.
12. This ECDP only authorizes the temporary emergency development identified herein, although the Executive Director may modify and/or extend the authorization to additional and closely related temporary emergency development for good cause provided that: such modification/extension is also necessary to temporarily abate the identified emergency; such modification/extension is sited and designed in such a way as to protect coastal resources as much as possible, including through imposition of additional ECDP conditions if necessary; and such modification/extension is subject to all of the terms and conditions of this ECDP, including any additional ECDP conditions added by the Executive Director in modifying/extending the authorization.
13. Within 90 days of issuance of this ECDP, or as extended by the Executive Director through correspondence, for good cause, the Permittee shall submit a complete follow-up CDP that satisfies the requirements of Section 13056 of Title 14 of the California Code of Regulations. If the Executive Director determines that the follow-up CDP application is incomplete and requests additional information, the Permittee shall submit this additional information by a certain date, as established by the Executive Director. If such a follow-up CDP application is withdrawn by the Permittee or is denied by the Commission, or if the follow-up CDP application remains incomplete for a period of 120 days after the Executive Director informs the applicant that the application is incomplete, the emergency development will no longer be considered authorized.
14. Failure to a) submit a complete follow-up CDP Application that complies with Condition 13 above; or b) comply with all terms and conditions of the required follow-up CDP, including any deadlines identified therein will constitute a knowing and intentional violation of the Coastal Act and may result in formal enforcement action by the Commission or the Executive Director. This formal action could include a recordation of a Notice of Violation on the Permittee's property; the issuance of a Cease and Desist Order and/or a Restoration Order; the imposition of administrative penalties for violations involving public access; and/or a civil lawsuit, which may result in the imposition of monetary penalties, including daily penalties of up to \$15,000 per violation per day, and other applicable penalties and other relief pursuant to Chapter 9 of the Coastal Act. Further, failure to follow all the terms and

September 21, 2021
Emergency Permit No.: G-2-21-0030

conditions of this ECDP will constitute a knowing and intentional Coastal Act violation.

15. Failure to comply with the conditions of this approval may result in enforcement action under the provisions of Chapter 9 of the Coastal Act.
16. The issuance of this ECDP does not constitute admission as to the legality of any development undertaken on the subject site without a CDP and shall be without prejudice to the California Coastal Commission's ability to pursue any remedy under Chapter 9 of the Coastal Act.

As noted in Conditions 7 and 8 above, the emergency development carried out under this ECDP is at the Permittee's risk and is considered to be temporary work done in an emergency situation to abate an emergency. For the development to be authorized under the Coastal Act and/or if the Permittee wishes to expand the scope of work, a regular CDP must be obtained. A regular CDP is subject to all of the provisions of the California Coastal Act and may be conditioned or denied accordingly.

If you have any questions about the provisions of this ECDP, please contact the Commission's North Central Coast District Office at 455 Market Street, Suite 300, San Francisco, CA 94105, (415) 904-5260.

CALIFORNIA COASTAL COMMISSION

NORTH CENTRAL COAST DISTRICT
455 MARKET STREET, SUITE 228
SAN FRANCISCO, CA 94105
PHONE: (415) 904-5260
FAX: (415) 904-5400
WEB: WWW.COASTAL.CA.GOV



NOTICE OF PROPOSED PERMIT AMENDMENT

Date: September 30, 2021
To: All Interested Parties
From: Stephanie Rexing, North Central Coast District Manager
Sara Pfeifer, North Central Coast Coastal Planner
Subject: Proposed Amendment to Coastal Development Permit (CDP) 2-20-0018
Applicant: Dillon Beach Resort, LLC

Original CDP Approval

CDP 2-20-0018 was approved by the Coastal Commission on February 12, 2021, and authorized redevelopment of an existing recreational vehicle (RV) park, management activities associated with the beach-front parking lot and adjacent sandy beach, and habitat restoration at Dillon Beach Resort in the Dillon Beach community of unincorporated Marin County. In terms of the RVs specifically, CDP 2-20-0018 authorized after-the-fact placement of 12 park model RVs (i.e., essentially more modular cabin-like units on a trailer base) and 13 new RVs (10 park model RVs and 3 Airstream trailers) at the Resort.

Proposed CDP Amendment

CDP 2-20-0018 would be amended to replace the 3 approved Airstream trailers with 3 park model RVs, similar to the other approved park model RVs at the Resort. The resultant outcome would be that all 25 RVs at the site would be park-model RVs. The Commission's reference number for this proposed amendment is 2-20-0018-A1.

Executive Director's Immateriality Determination

Pursuant to Title 14, Section 13166(b) of the California Code of Regulations, the Executive Director of the California Coastal Commission has determined that the proposed CDP amendment is immaterial for the following reasons:

The proposed changes would not change the use or the intensity of use at the site because the 3 approved Airstream trailers would be replaced with 3 park model RVs of a similar size and amenity level (e.g., the Airstreams would have each provided one room with a kitchen in a one-story RV, and the park models would do the same) in roughly the same proposed locations. Although the proposed park model RVs are slightly taller than the proposed Airstream trailers (the Airstreams are 9 feet, 3 inches tall and the park models are 11 feet, 10 inches tall), they are also shorter in length (by 3 feet, 8 inches), and as such should result in a comparable massing but slightly less view corridor blockage to the extent they might be seen from Beach Avenue. In addition, the park model RV units are more stylistically similar to the other authorized RVs onsite, and will help to create a more cohesive and uniform appearance across

the Resort. Finally, the Applicant has yet to submit the required revised final plans showing all siting and design for the RVs and related development (such as fencing), which will still be required to be reviewed and approved by the Executive Director for compliance with the terms and conditions of the CDP, including in relation to ensuring public view protections, and this proposed change does not alter the need for the Applicant to submit such final plans to refine Resort siting and design as directed by the CDP. In conclusion, the proposed amendment would not significantly change uses, intensities of use, or public view impacts associated with site development under the CDP, would lead to a more consistent Resort character overall, and can be found consistent with the Commission's original CDP approval, the Coastal Act, and the certified Marin County Local Coastal Program.

California Environmental Quality Act (CEQA)

CEQA Section 21080.5(d)(2)(a) prohibits a proposed development from being approved if there are feasible alternatives and/or feasible mitigation measures available that would substantially lessen any significant adverse effect that the development may have on the environment. Marin County, acting as lead CEQA agency, determined that the proposed RV changes will not have a significant adverse environmental effect, and exempted the proposed project from CEQA requirements.

The Commission's review, analysis, and decision-making process for CDPs and CDP amendments has been certified by the Secretary of the Natural Resources Agency as being the functional equivalent of the environmental review required by CEQA (CCR Section 15251(f)). Accordingly, in fulfilling that review, this report has discussed the relevant coastal resource issues with the proposal, and has concluded that approval of the proposed immaterial CDP amendment is not expected to result in any significant environmental effects, including as those terms are understood in CEQA. Accordingly, it is unnecessary for the Commission to suggest modifications (including through alternatives and/or mitigation measures) as there are no significant adverse environmental effects that approval of the proposed immaterial CDP amendment would necessitate. Thus, the proposed immaterial CDP amendment will not result in any significant adverse environmental effects for which feasible mitigation measures have not been employed, consistent with CEQA Section 21080.5(d)(2)(A).

Coastal Commission Review Procedure

The CDP will be amended as proposed if no written objections are received in the North Central Coast District office within ten working days of the date of this notice. If such an objection is received, the objection and the Executive Director's response to it will be reported to the Commission on Friday, October 15, 2021 at the Coastal Commission's virtual online meeting. If three or more Commissioners object to the Executive Director's determination of immateriality at that time, then the application shall be processed as a material CDP amendment.

If you have any questions about the proposal or wish to register an objection, please email NorthCentralCoast@coastal.ca.gov and/or please contact Sara Pfeifer in the North Central Coast District office.