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STAFF REPORT: REGULAR CALENDAR

Consistency Determination No.: CD-0008-25

Federal Agency: National Park Service

Project Location: Stinson Beach day use area within the Golden Gate National Recreation Area, Marin County

Project Description: Dune, floodplain, and riparian habitat restoration as well as reconfiguration of the public parking lots and associated entrance road to repair flood damage and improve resiliency to coastal hazards.

Staff Recommendation: Concurrence

SUMMARY OF STAFF RECOMMENDATION

The National Park Service (NPS) has submitted a consistency determination for a project at the Stinson Beach day use park within the Golden Gate National Recreation Area (GGNRA) in Marin County. The project would repair and modify the three public beach parking lots and portions of their entrance road in conjunction with native dune, floodplain, and riparian habitat restoration, to improve the site's resiliency to coastal and fluvial flood hazards and expand habitat areas. Stinson Beach park is a popular visitor-serving recreational beach area that receives a very high number of visitors, especially in the summer and fall months. The beach park includes a variety of day-use facilities that are free, open to the public year-round, and support activities such as beach recreation, picnicking, and water recreation (swimming, surfing, kayaking, and fishing). The site is adjacent to Easkoot Creek and flooding can occur in the northern and central parking lots when the creek overtops its banks after sustained periods of rain. The park is also vulnerable to shoreline hazards in which wave uprush from the Pacific Ocean

occasionally inundates the northern portions of the site during winter storms and/or extreme tides. For example, an atmospheric river event in January 2023 brought a series of storms with large waves, high ocean levels, and heavy rainfall to Stinson Beach that forced the closure of the park to vehicle access for three weeks and resulted in reduced visitor facilities. NPS states that the proposed project is needed because normal wear-and-tear over time, combined with increased flooding from Easkoot Creek and coastal storm surges, have damaged pavement and stormwater drainage facilities and caused significant erosion. The project would make the park's entrance road and three parking lots more resilient and able to sustain continued coastal recreational use in the face of increasingly frequent flooding.

The primary issue raised by the project relates to public access. The NPS parking lots provide the dominant means of visitor access to Stinson Beach. With the project improvements, vehicular parking capacity would be reduced from approximately 750 spaces to 680 spaces (a reduction of up to 70 spaces, or 10% of the total parking capacity) among the three parking lots within the park. In the most vulnerable areas where parking capacity would be reduced, 1.3 acres of dune, floodplain, and riparian habitat restoration is proposed to provide a buffer against flooding and to enhance ecosystem resilience. Portions of the North Lot have already naturally retreated due to damage from coastal hazards. NPS strived to minimize parking loss with the proposed design given site constraints. In contrast to armored solutions, the proposed managed retreat and habitat restoration is a more resilient approach to climate adaptation that incorporates ecological principles to support multiple benefits, including hazard adaptation and mitigation, natural resource resilience and enhancement, and recreation and scenic resource preservation.

The parking spaces that remain with the proposed modifications will be more reliably available for public use. As such, the benefits to public access represented by the proposed project, while difficult to quantify, still represent tangible improvements. In addition, NPS has proposed a range of design features and actions to further help offset the proposed loss of parking capacity within the beach lots. NPS would improve pedestrian beach access paths and ADA accessibility through the park and add 20 spaces of bicycle parking to support multi-modal access. Further, NPS has proposed to coordinate with Marin Transit on the sufficiency of existing public transit to Stinson Beach (Marin Transit Route 61) during the peak visitor season. NPS has stated that coordination with Marin Transit is ongoing and monitoring reports from recent years of Route 61 ridership indicate that utilization has been low. However, NPS would continue to assess trends with Marin Transit and implement measures to promote and widely advertise public transit availability in cooperation with Marin Transit and Marin County, including through the GGNRA website and social media. While the proposed project does represent an up to ten percent loss of parking spaces and availability, the reduction in parking is a necessary component of a project that, as a whole, would ensure that maximum access and recreational opportunities (including lower cost opportunities) are protected and provided consistent with the relevant Chapter 3 policies of the Coastal Act.

The project also includes construction of an overflow channel to carry occasional high storm overflows from Easkoot Creek through the beach park's central picnic area and across the North Lot to an existing outfall on the beach. The overflow channel would be located in the same general path currently used by flood waters but is designed to limit

damage to the entrance road and parking areas. Normal flows in the creek channel would not be affected. A portion of the central picnic area is delineated as an emergent wetland and the proposed flood overflow channel and realigned entrance road would bisect it. However, the overflow channel would be a clay-lined bioswale vegetated with native wetland plants and grasses and wetland hydrology would remain, allowing the ecological function of the remaining wetland to be enhanced. The realigned entrance road would also result in the loss of a small portion of the wetland area; however, this adverse impact has been minimized and would be mitigated by the floodplain and riparian habitat creation and restoration proposed adjacent to the Easkoot Creek (where the entrance road and North Lot would be demolished and realigned) at a greater than 4:1 ratio. These adverse impacts to wetlands can be found consistent with Coastal Section 30233 as the development qualifies as an allowable use (incidental public service purpose), there is no feasible less environmentally damaging alternative, and mitigation measures have been provided to minimize adverse environmental effects.

Lastly, NPS has included in its project resource protection measures to ensure consistency with the relevant water quality, wetland, biological, cultural, public access, and visual resource policies of the Coastal Act. For the reasons summarized above and described in the Findings below, Commission staff recommends that the Commission concur with Consistency Determination CD-0008-25. The standard of review for this project is consistency with the enforceable policies of the California Coastal Management Program (i.e., Chapter 3 policies of the Coastal Act). The motion and resolution to concur is on page 5 of this report.

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EXHIBITS

[Exhibit 1. Project Area Overview and Vicinity Map](#)

[Exhibit 2. Proposed Project Features and Aerial Views](#)

[Exhibit 3. Wetland and FEMA Flood Zone Map](#)

[Exhibit 4. Marin Transit Bus Route 61 Map](#)

[Exhibit 5. CoSMoS Sea Level Rise Projection Maps](#)

[Exhibit 6. NPS Letter \(received 7/21/2026\) Confirming Additional Proposed Measures](#)

I. FEDERAL AGENCY'S CONSISTENCY DETERMINATION

The U.S. National Park Service (NPS) has determined that the project is consistent with the enforceable policies of the California Coastal Management Program (CCMP).

II. MOTION AND RESOLUTION

Motion:

I move that the Commission concur with Consistency Determination CD-0008-25 on the grounds that the project described herein is fully consistent, and therefore consistent to the maximum extent practicable, with the enforceable policies of the California Coastal Management Program.

Staff recommends a **YES** vote on the motion. Passage of this motion will result in a concurrence with the determination of consistency and adoption of the following resolution and findings. An affirmative vote of a majority of the Commissioners present is required to pass the motion.

Resolution:

The Commission hereby **concurs** with Consistency Determination CD-0008-25 on the grounds that the project described therein is fully consistent, and therefore consistent to the maximum extent practicable, with the enforceable policies of the California Coastal Management Program.

III. APPLICABLE LEGAL AUTHORITIES

Standard of Review

The Commission's federal consistency review is guided by provisions of the federal Coastal Zone Management Act (CZMA) and by the approved California Coastal Management Program (CCMP), as described below. The CZMA (16 U.S.C. § 1451- 1464) requires that federal agency activities affecting coastal resources be "carried out in a manner which is consistent to the maximum extent practicable with the enforceable policies of approved State management programs." Id. at § 1456(c)(1)(A).

As stated in California's federally-approved Coastal Management Program (CCMP):

The California Coastal Management Program is a combination of Federal, State, and local planning and regulatory authorities for controlling the uses of land air and water resources along the coast. For the purposes of meeting CZMA requirements, the management program for the main coastline segment described in this document is the major component of a two-segment program, San Francisco Bay being the smaller segment. ... The California Coastal Management Program for the

main segment of the State's coastline includes the ... California Coastal Act of 1976.

Furthermore, page 14 of the CCMP states:

Section 30008 of the Coastal Act states that, "This division the California Coastal Act shall constitute California's coastal zone management program within the coastal zone for purposes of the Federal Coastal Zone Management Act of 1972". However, the CCMP is not necessarily limited to the Coastal Act itself because Section 30009 of the Act provides that, "This division shall be liberally construed to accomplish its purposes and objectives." It is clear that one of the purposes and objectives of Section 30008 is to declare the Legislature's intention that California's coastal management program satisfy the CZMA requirements for a state coastal management program. Any interpretation of Section 30008 that would preclude any component either necessary for program approval or advantageous to the implementation of the program from being included as part of the CCMP (e.g., Coastal Commission regulations, national interest statement, supporting legislation, etc.) would be in violation of Section 30009.

Consistent to the Maximum Extent Practicable

The implementing regulations for the CZMA ("federal consistency regulations"), at 15 C.F.R. § 930.32(a)(1), define the phrase "consistent to the maximum extent practicable" to mean:

... fully consistent with the enforceable policies of management programs unless full consistency is prohibited by existing law applicable to the Federal agency.

This standard allows a federal activity that is not fully consistent with the enforceable policies of the CCMP to proceed, if full consistency with the enforceable policies of the CCMP is "prohibited [by] existing Federal law applicable to the Federal agency's operations."¹ The NPS did not state in its consistency determination that full consistency with the enforceable policies of the CCMP would be prohibited by existing federal law. Since the NPS has raised no issue of practicability, as so defined, the standard before the Commission is full consistency with the enforceable policies of the CCMP, which are the policies of Chapter 3 of the Coastal Act (Cal. Pub. Res. Code §§ 30200-30265.5).

IV. FINDINGS AND DECLARATIONS

A. Project Location and Setting

The proposed project is located at Stinson Beach park within the Golden Gate National Recreation Area (GGNRA), situated between the Pacific Ocean and Highway 1 at the base of the coastal hills of Mount Tamalpais in Marin County (**Exhibit 1**). Stinson Beach is a popular visitor-serving recreational beach area that receives a high number of visitors,

¹ 15 CFR Section 930.32

especially in the summer months. The beach park includes a variety of day-use facilities that are free, open to the public year-round, and support activities such as beach recreation, picnicking, and water recreation (swimming, surfing, kayaking, and fishing). The existing facilities include three parking lots, three restroom structures, outdoor showers, picnic table areas with barbecues, a snack bar building with lifeguard office, various pedestrian paths throughout the site, and a pedestrian bridge over Easkoot Creek between the town's commercial center and the park. Lifeguards are generally present during the warm summer months from the first week of July to Labor Day.

The park contains an access road and vehicular bridge over Easkoot Creek from Highway 1 and a small entrance booth before reaching the park's three existing parking lots – the North, Central, and South lots (**Exhibits 1-2**). Parking is available between sunrise to sunset. The Central lot is the main lot open year-round, is paved, and contains six ADA-accessible parking spaces. The North lot is open when needed, is paved, and contains six ADA-accessible parking spaces. The South lot is used for overflow parking during peak visitation and is unpaved. The Central lot also contains ADA-access paths to the central restroom and to the beach sand. Beach wheelchairs are available upon request.

The GGNRA parking lots provide the dominant means of accessing Stinson Beach for the public. Most people access Stinson Beach by car and park in one of the three public parking lots; however, public transit by Marin Transit's bus route 61 offers daily service between Sausalito and Bolinas with a Stinson Beach stop that is a short walk from the park (approximately 350 feet) (**Exhibit 4**). In addition, Stinson Beach is also accessible from the Dipsea Trail, a scenic yet challenging 7-mile regional hiking trail route that extends from Mill Valley, climbs over Mount Tamalpais, passes through Muir Woods and descends to Stinson Beach. The Dipsea Trail passes through land managed by California State Parks and the National Park Service.

Portions of the Stinson Beach park are immediately adjacent to Easkoot Creek, which is a perennial stream that extends from its headwaters along the western slopes of Mt. Tamalpais, west through the town of Stinson Beach and the subject site, and north into Bolinas Lagoon, an ecologically important tidal area. The portion of Easkoot Creek on the subject site is lined with riparian vegetation that is adjacent to the park's entrance road. The majority of the proposed project site is located within a 100-year floodplain, and Easkoot Creek is subject to overbank flooding typically as a result of sustained periods of precipitation during winter and early spring (**Exhibit 3**). In addition, the park is also vulnerable to coastal hazards such as wave overwash from the Pacific Ocean which can inundate the northern portions of the site during winter storms (**Exhibit 5**). There are vegetated and unvegetated dunes between the beach and the picnic and parking areas that provide the park with some protection from heavy surf caused by storms.

B. Project Description

The National Park Service (NPS) proposes to rehabilitate the public parking lots and associated access road and paths located at Stinson Beach park, including re-configuration and re-surfacing of the parking lots, entrance road, pedestrian paths, utilities, and drainage facilities to repair damage and reduce future flood risk and damage. In addition, native dune, floodplain, and riparian habitat restoration are proposed to expand

and enhance native habitat areas and to improve the site's resiliency to coastal and fluvial flood hazards. NPS states that the proposed project is needed because normal wear-and-tear over time, combined with increased flooding from Easkoot Creek and coastal storm surges, have damaged pavement and stormwater drainage facilities and caused significant erosion. As a result, deteriorated site conditions are making it increasingly difficult and expensive for NPS to maintain safe driving and pedestrian conditions in and around the parking lots.

Proposed Parking Lot Improvements and Habitat Restoration

Portions of the entrance road design near the parking lots would be modified, including a new roundabout, for better traffic circulation and a wider setback from Easkoot Creek. Specifically, the new roundabout along the entrance road would ensure congestion does not overwhelm the capacity of the parking lots or close emergency lanes. The parking lots would also be modified for improved circulation, functionality, and flood resilience (**Exhibit 2**). The deteriorated surface of the parking lots and access road would be replaced and stormwater infrastructure at all three parking lots would be upgraded following stormwater best management practices (BMPs). Some parking spaces would be removed from areas most prone to storm damage and restored to native habitat.

The northern parking lot (North Lot) is proposed to be reconfigured away from areas most vulnerable to flooding, which would decrease parking capacity within the lot by nearly half, from 170 to 90 spaces. Removing parking would provide areas for restoration of natural habitats to provide a buffer against flooding and enhance ecosystem resilience. The proposed project includes 0.6 acres of habitat restoration in the North Lot, including 0.3 acres of dune/dune scrub restoration and 0.3 acres of floodplain restoration.

The central parking lot (Central Lot) is proposed to be realigned and slightly expanded to accommodate excavation of a flood overflow channel (described further below) and increased parking. Parking in the Central Lot would increase by approximately 25 spaces, from 150 to 175 spaces. With realignment of the main entrance road near the Central Lot, the project includes 0.2 acres of riparian habitat restoration alongside Easkoot Creek.

The southern parking lot (South Lot) would be realigned within its existing footprint to better facilitate circulation and allow for dune habitat enhancement and restoration. Parking bays would be aligned parallel with the beach, using wheel-stops to delineate spaces. The parking lot would remain unpaved, but the existing gravel surface would be reconditioned to provide a new 6-inch-deep aggregate surface. Existing earthen berms would be removed to create a more efficient parking layout and improved circulation and emergency vehicle access. Parking capacity in the South Lot would decrease by approximately 15 spaces, from 430 to 415 spaces. Dune habitat would be restored in areas made available by the reconfiguration of parking spaces, totaling 0.5 acres alongside 715 linear feet of beach shoreline, with fencing to delineate public access through the restored dunes system.

In total, parking lot capacity would be reduced by approximately 70 spaces as a result of the proposed improvements among the three Stinson Beach parking lots, as summarized in Table 1 below.

Table 1. Parking Space Changes with Proposed Project

	Existing	Proposed	Change
North Lot	170	90	-80
Central Lot	150	175	+25
South Lot	430	415	-15
Total	750	680	-70 (10% reduction)

Under existing conditions, NPS states that the parking lots only reach full capacity approximately 20 times a year on average, which are always during sunny, warm days in the summer or early fall. NPS asserts that the proposed project is consistent with the public access policies of the Coastal Act because it would improve parking lot resiliency, accessibility, and circulation to better serve the public and enhance their access to coastal resources. NPS states that without the proposed project, increasingly frequent, damaging storm events are expected to continue to result in temporary closures of the parking lots for cleaning and repairs, and the new design will eliminate the need for these closures; thereby offsetting any loss in visitation from reduced parking capacity. NPS asserts the proposed project would retain as much parking as practicable while increasing the resilience of the site in the face of increasingly common storm events and flooding.

The proposed project would also replace deteriorated curbing and sidewalks and provide new pedestrian pathways across the site to the beach, including modifications to meet requirements under the Americans with Disabilities Act (ADA) in the North and Central Lots. Bicycle parking would be improved with at least 20 new spaces to support multi-modal access. Public access and parking within the park is currently free of charge and the proposed project does not include the institution of any fees.

NPS has also proposed the following to maximize public access and offset the project's reduction in vehicle parking spaces and construction-related public access impacts (**Exhibit 6**):

- Parking Space Maximization. Through the design process, continue to identify and select the maximum amount of parking that can be reasonably provided, with a focus on the South Lot.
- Multi-modal and ADA Access Improvements. Include and maximize improvements to pedestrian paths, ADA accessibility, and bicycle parking (20 spaces) in the site design.
- Public Transit. Continue coordinating with Marin Transit on the sufficiency of existing public transit to Stinson Beach (Marin Transit Route 61) during the peak visitor season.
- Transportation-related Outreach and Messaging. Continue to promote public transit availability to Stinson Beach through the GGNRA website and social media, and use NPS's changeable message signs on Hwy 101. Work with Marin County to

provide advanced messaging to the public when the Stinson Beach parking lots are likely to be full to help minimize traffic congestion on Hwy 1 to Stinson Beach. Coordinate with Marin Transit and Marin County on potential advertising partnerships to more widely advertise public transit availability to Stinson Beach.

- Reporting. Beginning one year after completion of construction, provide annual reporting to CCC staff on (1) approximate frequency of the park's parking lots reaching capacity, and (2) results of coordination with Marin Transit on the promotion of public transit to Stinson Beach (Route 61), and measures implemented to promote and incentivize public transit ridership to Stinson Beach (i.e. advertising, signage, free fare promotions) during the peak visitor season. This information will be reported to Commission staff in the form of an annual meeting.
- Long-term Planning. Continue working with the County and local stakeholders on maintaining beach and parking lot access and coastal resiliency.
- Construction Phasing & Access Management. Phase and manage construction for the estimated 14-month construction duration in a manner that minimizes impacts to public access, parking, and traffic congestion, including:
 - Consider alternative routing for entry and exit to ensure parking lot and beach access is provided throughout construction.
 - Use NPS's permanent changeable message signs located on US 101 in Marin County for advanced messaging for construction impacts and congestion.
 - Describe construction phasing plan and the methods (such as signage, fencing, traffic control, etc.) by which safe public access would be maintained around work areas during all project operations, including advance public notification and signage to effectively communicate construction activities and closures via multiple outlets, including the park's website, various signs, and the visitor center.
 - Site staging and storage areas for construction vehicles, equipment, and materials away from visitor use areas and clearly identify them in advance of construction. The minimum number of public parking spaces that are required for the staging of equipment, machinery and construction-related parking shall be used.
 - Employ noise-reducing construction practices pursuant to NPS specifications.
 - Avoid construction work on Saturdays, Sundays, and holidays, except when unavoidable as required for safety or to ensure the integrity of a proposed project component.

Proposed Stormwater Infrastructure and Overflow Channel Improvements

Drainage from parking lots and roadways is proposed to be improved by replacing drainage inlets and associated culverts. The project also includes construction of a clay-lined overflow channel (bioswale) to carry occasional high storm overflows from Easkoot

Creek through the central picnic area and across the North Lot to an existing outfall on the beach. Normal flows in the creek channel would not be affected. The picnic area would be located on each side of the channel to allow continued public use. The main access drive would be realigned at the new channel as a low water crossing, which would remain dry except during overflow events.

The proposed overflow channel would be located in the same general path currently used by flood waters but is designed to limit damage to the parking areas. The channel would be located within the developed portion of the site and designed to withstand anticipated erosional stresses caused by severe rain events and flooding. Construction would use natural materials, including native vegetation and boulders to slow water flow and protect against erosion. A portion of the channel running through the Central Lot would be below the water table during wet periods, and the channel would be lined with a layer of clay to prevent infiltration and retention of groundwater in the channel. The overflow channel outfall, located at the existing floodwater outlet of the North Lot, would consist of a buried Class 3 riprap apron (12-15 inch rock) overlaid by 6-inches of topsoil and planted with native vegetation.

Approximately 30,492 sq. ft. (0.7-acre) of the picnic area between the North and Central Lots has been delineated as a palustrine emergent wetland (**Exhibit 3**). According to NPS, this wetland area has minimal ecological function because it is managed as a lawn that is dominated by non-native bermuda grass and is regularly mowed so park visitors can use the picnic tables and barbeque pits within this area. A portion of the overflow channel improvements would bisect the wetland area. NPS states that the overflow channel through this area would be vegetated with native wetland plants and grasses and is expected to enhance the ecological function of the wetland area. NPS would ensure that wetland hydrology is not adversely affected, with the exception of an approximately 4,356 sq. ft. (0.1-acre) area that would be filled by a portion of the realigned entrance road. However, this adverse impact would be mitigated by the floodplain and riparian habitat creation/restoration proposed adjacent to the Easkoot Creek (where the entrance road and North Lot would be demolished and realigned) at a more than 4:1 ratio.

Since the proposed project plans are still preliminary at this time, NPS will submit final design plans to Commission staff at least 90 days before commencement of construction that are in substantial conformance with the project described in the subject consistency determination submittal, and include:

- Final parking space count and multi-modal and ADA-accessible public access improvement design;
- Final construction phasing and access management plan;
- Final habitat restoration area design and planting plans;
- Final wetland and native tree impact accounting and mitigation plan (adverse impacts to wetlands and native trees to be minimized to extent feasible and mitigated);
- Final overflow channel design, which would be vegetated with wetland plants and grasses and use natural elements, including boulders to the maximum extent feasible, in consideration of public recreation use (picnicking and access) and maintenance needs;

- Final drainage, erosion control, and polluted runoff control features that serve to minimize stormwater runoff, control erosion, and effectively prevent the transport of contaminants to habitat areas and the marine environment and support long-term improvements in coastal water quality; and
- Evidence of agency approvals, or evidence that none is required.

The federal consistency regulations (15 CFR § 930.46) provide that for proposed federal agency activities that were previously determined by the state agency to be consistent with the management program, but which have not yet begun, federal agencies shall further coordinate with the state agency and prepare a supplemental consistency determination if the proposed activity will affect any coastal use or resource substantially different than originally described. This process would apply if the final design plans submitted prior to construction contain changes that would result in any coastal use or resource effects substantially different than originally described by NPS and evaluated by the Commission.

C. Consultations and Other Agency Approvals

Regional Water Quality Control Board

In accordance with the National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities, NPS will obtain a Construction Stormwater General Permit and prepare a Stormwater Pollution Prevention Plan (SWPPP).

National Marine Fisheries Service and U.S. Fish and Wildlife Service

NPS initiated informal consultation with the National Marine Fisheries Service. After evaluating the level of effects, NPS issued a No Effects Memo in compliance with Section 7 of the Endangered Species Act. There are no federally listed species under the jurisdiction of the U.S. Fish and Wildlife Service present within the proposed project area.

U.S. Army Corps of Engineers

NPS completed informal consultation with the U.S. Army Corps of Engineers and determined that no permit is required for this project.

Tribal Outreach and Consultations

NPS engaged in tribal consultation for the proposed project with a letter to the Tribal Heritage Preservation Officer for the Federated Indians of Graton Rancheria (FIGR) on September 4, 2024, and that consultation is ongoing. Commission staff also conducted outreach to FIGR on December 8, 2025, May 21, 2026, and July 16, 2026, to share project information and invite consultation. The outcome of consultations is discussed further in Section H of this staff report.

D. Public Access and Recreation

Coastal Act Section 30210 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.

Coastal Act Section 30213 states, in part:

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

Coastal Act Section 30221 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 public access policies of Chapter 3 of the Coastal Act require maximum coastal access and recreational opportunities, including lower cost opportunities, to be protected and provided. In this case, both the public's access to, and use of, the shoreline and the beach park amenities at Stinson Beach within GGNRA – and the low-cost recreational opportunities they provide – would be affected by the proposed project. Specifically, coastal access and recreation would be affected by the reconfigured parking lot design and through short-term limits established during construction.

Parking Lot Reconfiguration

The proposed project to configure and rehabilitate the parking lots at Stinson Beach is intended to repair flood damage and reduce future flood risk and damage to the parking lots and access road—access to which has been limited, and at times unsafe, as a result of storm events and emergency parking lot repair activities. Improving the sustainability and resilience of the three parking lots is necessary to support continued coastal recreational use at Stinson Beach, and the proposed project would create a safer environment for visitors without prolonged and increasingly frequent disruptions from damaging floods.

Specifically, the North Lot is proposed to be reconfigured away from areas most vulnerable to flooding, which would decrease parking capacity within the lot by approximately 80 spaces, from 170 to 90 spaces. The parking reduction in the North Lot would provide areas for habitat restoration to enhance ecosystem resilience and a buffer against flooding. The Central Lot is proposed to be realigned and slightly expanded to accommodate an overflow channel for Easkoot Creek and increased parking by approximately 25 spaces, from 150 to 175 spaces. The South Lot would be realigned within its existing footprint to better facilitate circulation, emergency vehicle access, and allow for dune habitat enhancement and restoration, which would decrease parking capacity by approximately 15 spaces, from 430 to 415 spaces. Native dune, floodplain, and riparian habitat restoration is proposed to expand and enhance native habitat areas and improve the site's resiliency to coastal and fluvial flooding hazards. However, vehicular parking capacity would be reduced by a total of up to approximately 70 spaces

(from approximately 750 to 680 spaces) among the three lots as a result of the improvements. This represents a ten percent reduction in parking spaces at the park.

The National Park Service (NPS) notes that:

This project will protect parking areas at Stinson that have been repeatedly lost in recent flood events. The proposed parking lot design will align capacity with the constraints of the site and improve resiliency during flooding.

The number of days that the parking lots would reach capacity is not expected to change. This is due to the visitation patterns that Stinson Beach experiences. There are approximately 20 days per year that the park experiences exceptionally high visitation, which is related to very warm, sunny weekend days during the peak season (June-October) when residents from across the Bay Area travel to the coast. The demand during these days overwhelms parking and road capacity at most coastal destinations, particularly ones with sandy beaches, including Stinson Beach.

The rest of the days of the peak season the parking lots fill to between 50-75% of capacity, which is well within the capacity of the new design. The park conducted detailed parking counts at Stinson Beach in July 2025, to better understand how the three parking lots load and unload during peak season, and to estimate the potential impact that the new design may have on visitation. The counts were conducted between July 3-20, which included 3 peak weekends (with one being a peak holiday weekend). Over this period, there were no days that reached capacity of either the existing or proposed lots.

Without the proposed action, increasingly frequent, damaging storm events are expected to continue to result in temporary closures of the parking lots for cleaning and repairs. The new design will eliminate the need for these closures; thereby offsetting any loss in visitation from reduced parking capacity. The proposed action would provide a solution that would retain as much parking as practicable while increasing the resilience of the site in the face of increasingly common storm events and flooding.

NPS developed the proposed parking and circulation modifications in consideration of the patterns of coastal and fluvial flooding within the park and to increase both public access and ecosystem resiliency. NPS strived to minimize parking loss with the proposed design and has committed to evaluate whether additional parking spaces may be gained within the modified South Lot footprint as the design process proceeds.

Expansion or reconfiguration of the footprint of the parking lots to gain additional parking spaces is not feasible given the sensitive habitat values of the adjacent creek, riparian and coastal sand dune areas on-site and related wave uprush and flood hazards. Portions of the North Lot have already naturally retreated due to damage from coastal hazards. The proposed parking lot reconfiguration project would strategically retreat the most threatened portions of the site, which is typically a preferred alternative to the use of shoreline protective structures. Shoreline protective devices can have a variety of negative impacts

on coastal resources including adverse effects on shoreline sand supply, scenic qualities, natural landforms, and overall shoreline beach dynamics on and off site, ultimately resulting in the loss of beach. In contrast to hard solutions, the proposed reconfiguration, managed retreat and dune restoration is more resilient approach to protecting public access.

The parking spaces that remain with the proposed modifications will be more reliably available for public use given the likely continued flooding and erosion of the existing parking lot and further loss of spaces. As such, the benefits to public access represented by the proposed project as a whole represent tangible improvements to public access. Therefore, in order to realize the public access benefits of the entire project, it is necessary to accept some reduction in public parking spaces. In addition, the Commission has found, in previous actions,² that a loss of vehicle parking can be mitigated by other measures such as the provision of bicycle parking spaces as well as public transit improvements. In order to help offset the loss of public vehicle parking spaces and availability, and thus ensure that maximum public access is provided at the site, NPS has proposed to improve pedestrian beach access paths and ADA accessibility through the park, as well as to provide 20 spaces of bicycle parking to support multi-modal access as part of this project. Further, public access and parking within the park is available to the general public free of charge and this action would not change that or include the institution of fees.

To further help maximize public access to Stinson Beach, NPS has also proposed to coordinate with Marin Transit on the sufficiency of existing public transit to Stinson Beach (Marin Transit Route 61) during the peak visitor season. NPS has stated that coordination with Marin Transit is ongoing and monitoring reports from recent years of Route 61 ridership indicate that use has been low. However, NPS would continue to assess trends with Marin Transit and implement measures to promote and widely advertise public transit availability in cooperation with Marin Transit and Marin County, including through the GGNRA website and social media.

To support continued monitoring and adaptive management, NPS would monitor park use after construction of the parking lot improvement project and continue working with the County and local stakeholders on maintaining access and coastal resiliency. NPS would also hold an annual meeting to report back to Commission staff regarding the approximate frequency of the park's parking lots reaching capacity, the results of coordination with Marin Transit on the promotion of public transit to Stinson Beach (Route 61), and measures implemented to promote and incentivize public transit ridership to Stinson Beach (i.e. advertising, signage, free fare promotions) during the peak visitor season.

Further, NPS would continue to use its changeable message signs on Hwy 101 in Marin County for early public notification of when the Stinson Beach parking lots are full, to help minimize traffic congestion on Highway 1 to Stinson Beach.

In summary, the Commission finds that while the proposed parking lot rehabilitation project does represent an up to ten percent loss of parking spaces and availability, the reduction

² See CDPs [4-25-0717](#), [5-24-1045](#), [A-5-VEN-15-0003](#), and [4-05-148 / A-4-SBV-06-037](#), among others.

in parking is a necessary component of a project that, as a whole, would help ensure maximum access and recreational opportunities (including lower cost opportunities) are protected and provided.

Construction

Construction of the proposed improvements would take approximately 14 months to complete and would include summer months. During construction, use of the three parking lots and access road would be limited. As such, the project is expected to result in adverse impacts to public access during construction. However, NPS has proposed to perform the work in phases so that access to the beach and park amenities would remain available throughout the 14-month construction window. NPS states:

The project would require the phased closure of the parking lots during construction. Visitors would still have access to the beach and park amenities; however, parking capacity would be reduced during construction, which would temporarily affect public access. Visitors and residents would likely experience more congestion in the parking area and surrounding community and may choose to resort to other means of transportation such as public transportation or carpooling.

Construction activities would also generate noise and cause visual disruptions that could affect the quality of recreational experiences. Although Stinson Beach normally experiences high visitation and visitors may feel crowded during the warmer months, visitors seeking a relaxing beach experience still may be negatively affected by the presence of heavy machinery and construction-related sounds; however, these impacts would be limited in frequency and duration. Construction activities would abide by standards specified in the Marin County noise ordinance.

Although there would be temporary impacts to recreation from reduced access and disturbances during construction, the proposed action is anticipated to improve visitor accessibility and safety by constructing new beach access pathways, improving parking circulation, and addressing flood risks. Improving the sustainability and resilience of the three parking lots is necessary to support continued coastal recreational use at Stinson Beach, and the proposed action would create a safer environment for visitors without prolonged and increasingly frequent disruptions from damaging floods.

To maximize public access during construction, NPS has committed to phase and manage construction for the estimated 14-month construction duration in a manner that minimizes impacts to public access, parking, and traffic congestion. A final construction phasing and access management plan will be submitted to the Executive Director for review at least 90 days before commencement of construction, which will include, at a minimum, the following elements:

- Avoidance of construction work on Saturdays, Sundays, and holidays, except when unavoidable as required for safety or to ensure the integrity of a proposed project component.

- Use of NPS's permanent changeable message signs located on US 101 in Marin County for advanced messaging about construction impacts and congestion.
- Development and implementation of a detailed construction phasing plan, including methods (such as signage, fencing, traffic control, etc.) by which safe public access would be maintained around work areas during all project operations. Alternative routing would be provided for entry and exit to ensure access and use of the lots is maintained throughout construction and advance public notification and signage would be used to effectively communicate construction activities and closures via multiple outlets, including the park's website, various signs, and the visitor center.
- Site staging and storage areas for construction vehicles, equipment, and materials would be established away from visitor use areas and would be clearly identified in advance of construction. The minimum number of public parking spaces that are required for the staging of equipment, machinery and construction-related parking shall be used.
- Noise-reducing construction practices would be used pursuant to NPS specifications.

These measures will ensure that interruptions to public access are minimized and the safety of recreational users are protected during construction operations.

For the reasons described above, the proposed project will protect and provide maximum access and recreational opportunities (including lower cost opportunities) and will not result in significant adverse impacts to recreational opportunities and public coastal access at the project site. Therefore, the Commission finds that the project is consistent with the relevant public access and recreation policies of the CCMP (Sections 30210, 30213, and 30221).

E. Biological Resources, Water Quality, and Wetlands

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 the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of

wastewater discharges and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with the surface water flow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.

Section 30232 of the Coastal Act states:

Protection against the spillage of crude oil, gas, petroleum products, or hazardous substances shall be provided in relation to any development or transportation of such materials. Effective containment and cleanup facilities and procedures shall be provided for accidental spills that do occur.

Section 30233 of the Coastal Act states, in relevant part:

- (a) The diking, filling, or dredging of open coastal waters, wetlands, estuaries, and lakes shall be permitted in accordance with other applicable provisions of this division, where there is no feasible less environmentally damaging alternative, and where feasible mitigation measures have been provided to minimize adverse environmental effects, and shall be limited to the following:

...

- (4) Incidental public service purposes, including but not limited to, burying cables and pipes or inspection of piers and maintenance of existing intake and outfall lines.

Section 30240(b) of the Coastal Acts states:

- (b) Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade those areas, and shall be compatible with the continuance of those habitat and recreation areas.

Biological Resources and Water Quality

The proposed project has the potential to negatively affect marine resources and coastal waters through sedimentation, turbidity, debris, polluted runoff control, as well as accidental spill or release of crude oil, gas, petroleum products, or other hazardous substances. The proposed project also has the potential to adversely affect ESHA through construction-related disturbance, erosion, debris and pollutants. However, as explained below, best management practices are proposed to avoid these impacts.

The project site is a popular public beach park that is highly disturbed by significant human activity on a daily basis. However, the developed portion of the park is adjacent to coastal dune and riparian forest habitat communities that are considered environmentally sensitive habitat areas (ESHA). A portion of Easkoot Creek is adjacent to the park's entrance road and is lined with riparian vegetation. It is a perennial stream that has been documented to support all life stages of the federally-threatened, Central California Coast steelhead trout (*Oncorhynchus mykiss*). Critical habitat for steelhead has been designated and includes the channel adjacent to the project area (NOAA 2005).

All proposed work to reconfigure and rehabilitate the parking lots and entrance road would be located within the existing developed portions of the site. No direct adverse impacts to creek, riparian, or dune habitats are expected to occur but some enhancement and expansion is expected. The proposed project would reduce impervious surface area and restore 0.8 acres of dune habitat, 0.3 acres of floodplain habitat, and 0.2 acres of riparian habitat. The proposed restoration would expand the area of existing native habitats and would thus result in a net benefit to the coastal environment.

NPS states that the proposed overflow channel through the developed park has been designed to avoid adverse impacts to steelhead and creek flows that sustain the ecology downstream, including through use of a geosynthetic clay liner within the overflow channel to avoid any seepage loss in Easkoot Creek flows at the tail end of the smolt outmigration period in May-June when flows are at their lowest.

Where dune restoration is proposed in the South Lot, fencing would be installed to delineate no more than three access paths through the restored dune system, rather than the existing ten paths, to better support dune health while also maintaining pedestrian beach accessibility.

The proposed project would involve demolition and grading activities adjacent to sensitive habitat areas and thus may result in temporary disturbance to wildlife and their habitats due to noise and human disturbance during construction activities. Approximately twenty trees within the developed portion of the park would be removed to accommodate the realigned entrance road, parking lots, and overflow channel; however, NPS states that the trees do not provide consistent nesting habitat for birds and were planted for ornamental purposes.

NPS states:

Temporary Impacts - The proposed action would result in temporary, localized disturbance to wildlife and wildlife habitat but would not affect the viability or population dynamics of wildlife in the project area. Construction activities, including staging of equipment and materials, could temporarily disturb areas of lawn or turf within the parking area. Overall, impacts during parking lot rehabilitation would be indirect and short term, resulting from noise and human disturbance during construction activities. Vegetated areas disturbed during construction would be revegetated once construction is complete, and the mitigation measures described below would be implemented to avoid or mitigate indirect impacts to riparian and aquatic habitats from erosion and sedimentation.

Permanent Impacts - The proposed action would include habitat restoration and enhance the resilience of coastal ecosystems in the project area. The area of impervious parking lot surface would be reduced compared to existing conditions, and approximately 1.3 acres of existing parking lot surface or lawn/turf would be restored to native plant communities, including 0.8 acres of dune habitat, 0.3 acres of floodplain habitat, and 0.2 acres of riparian habitat. The dune habitat restoration, located adjacent to the North and South Lots, would provide habitat and protect

inland areas from future storm surges. Approximately 0.5 acres of dune restoration would be adjacent to the South Lot, which is the portion of Stinson Beach most conducive to potential natural foredune accretion because of the lack of development in this area (ESA 2021). The remaining 0.3 acres of dune restoration in the North Lot would serve to reduce wave run-up and flooding during storm surges. The proposed action would not disturb dune habitat adjacent to the Central Lot. Floodplain restoration would serve the same purpose and have a long-term, beneficial impact to wildlife. Finally, the riparian habitat restoration would increase the natural buffer alongside Easkoot Creek and include the plantings of appropriate native vegetation like willow and alder. This woody vegetation would increase cover available to wildlife, add habitat complexity for aquatic species, increase stream shading, and improve water quality. Overall, these habitat restoration actions would have long-term, beneficial impacts on wildlife.

In summary, while the proposed action may cause temporary, adverse impacts to wildlife during project construction, there would be overall beneficial, long-term impacts to wildlife habitat. These benefits include increased protection and enhancement of dune and riparian habitat, including the planting of native vegetation.

Mitigation measures would be implemented during and after construction to minimize the degree or severity of adverse effects on wildlife and wildlife habitat. To mitigate adverse impacts on wildlife and wildlife habitat, NPS would:

- Schedule work to the extent feasible during dry summer and fall months.
- Conduct tree and other vegetation removal outside the nesting season (March 1 to July 31). If vegetation clearing or ground-disturbing activities occur during the nesting season, a qualified biologist would conduct a survey for nesting birds within five days prior to starting work. If a lapse in project-related work of one week or longer occurs, another focused survey would be conducted before project work can be reinitiated. Surveys would cover a minimum of a 1/4-mile radius around the construction area. If nesting birds are found, a buffer would be established around the nest and maintained until the young have fledged. Appropriate buffer widths are 300 feet for non-listed raptors and 100 feet for non-listed passerines. A qualified biologist may identify an alternative buffer based on a site-specific evaluation. Work would not commence within the buffer until fledglings are fully mobile and no longer reliant on the nest or parental care for survival.
- Clearly delineate the limits of disturbance prior to beginning work with flagging or other means to minimize the area impacted by the work.
- Protect sensitive plant populations from any construction disturbance.
- Salvage native wetland vegetation in the project footprint as feasible and re-plant in nearby areas or store on-site and re-plant in areas disturbed by construction.

- Prune vegetation in the work zone and leave roots intact. Take special care to ensure that willow trunks are protected: prune willows, but leave roots intact to facilitate re-growth from existing stumps and to help maintain soil stability in the dunes.
- Place plywood on the ground surface in areas near vegetation to prevent damage to the roots from heavy equipment and personnel working in the area.
- Set vegetation trimmings (except clean, salvaged material) aside in a designated area on top of landscape fabric and haul away as weeds to prevent the spread of Cape ivy and other invasive plants.
- Revegetate all areas where vegetation is disturbed to restore the site with native plants to the maximum extent practicable. Revegetation actions would include the removal of invasive plants, mulching, and salvage (when possible) and re-planting of native plants.
- Survey for and remove invasive plants in disturbed areas after construction activities are complete and on an ongoing basis in accordance with the park's invasive plant management procedures.
- Clean, brush, and check tracks or tires of equipment working in weed-infested areas for miscellaneous weed seeds before moving to other locations on-site.
- Certify all rock, gravel, and imported materials as weed-free, and source these materials through suppliers approved by the park.
- Avoid idling of construction vehicles and equipment when not in use and use low-emission producing equipment when feasible.

The water quality of the marine environment and nearby sensitive habitats could also be adversely impacted as a result of the implementation of project activities from erosion or the discharge of sediment, debris, and pollutants. The NPS proposes a number of construction and post-construction erosion control, polluted runoff control, and best management practices to protect water quality and adjacent habitats, including:

- Clean all vehicles, tools and equipment of dirt and vegetative material prior to entering the work site each day and at the end of each work day.
- Prohibit the discharge of pollutants from vehicle or equipment cleaning into any storm drains, water courses, or wetlands.
- Require the contractor to keep all waste and contaminants contained and remove them daily from the work site. Use wildlife-proof trash receptacles to contain uneaten human food and wildlife attractants. Institute a trash management program to ensure that all food scraps, paper wrappers, food containers, cans, bottles, and other trash are deposited in covered or closed

trash containers. Remove the trash containers from the project site at the end of each working day.

- Stage, store, refuel, and repair equipment in designated previously disturbed or paved areas outside the construction footprint and in areas approved by the NPS, at least 50 feet away from streams and wetlands, except at established commercial gas stations or established vehicle maintenance facilities. Do not refuel or conduct maintenance in the parking lots.
- Do not allow any large fuel storage containers. Deliver fuel to the site only in pickup trucks designed for fuel hauling, but not otherwise stored on-site.
- Inspect vehicles and equipment entering the project area for leaking oil and fluids. Require any leaking vehicles or equipment to be fixed before entering.
- Maintain spill kits on-site at all times during construction operations and/or staging or fueling of equipment.
- Remove all tools, equipment, barricades, signs, and surplus materials from the project area upon completion of the project.
- Install erosion control measures to prevent runoff of sediment or sediment-laden water from the site into adjacent waterbodies. Erosion control measures should consist of any and all BMPs for stormwater discharges, including silt fencing, barrier protectors, straw bales, temporary soil retention blankets, excelsior drainage filters, sediment traps and berms. Ensure all erosion control products are weed-free and made of materials approved by the park.
- Collect concrete waste and water from curing operations in washouts and dispose of it in locations approved by the park. Do not allow waste and water from curing operations to enter streams and wetlands.
- Stormwater infrastructure at all three Stinson Beach parking lots would be upgraded following stormwater best management practices (BMPs). The existing drainage inlets and associated culverts would be replaced to improve drainage from parking and roadways. These improvements would be designed to avoid increasing flood risks to downstream properties north of the Stinson Beach parking area.
- Obtain a Construction Stormwater General Permit and prepare a Stormwater Pollution Prevention Plan for achieving compliance with stormwater regulations through the use of BMPs to prevent erosion and runoff to wetlands.

Since the proposed project plans are still preliminary at this time, NPS will submit final design plans prior to commencement of construction that reflect final design of all habitat restoration areas as well as the overflow channel, which would be vegetated with wetland plants and grasses and use natural elements including boulders to the maximum extent feasible in consideration of public recreation use (picnicking and access) and maintenance

needs. In addition, the final plans would include final drainage, erosion control, and polluted runoff control features that serve to minimize stormwater runoff, control erosion, and effectively prevent the transport of contaminants to habitat areas and the marine environment and support long-term improvements in coastal water quality.

Further, the proposed development may require approval from other agencies charged with protection of marine and coastal resources, including the United States Army Corps of Engineers, the United States Fish & Wildlife Service, and/or the Regional Water Quality Control Board. The NPS has initiated consultations with these agencies and will provide evidence of final approvals (if required) prior to commencement of construction. Any changes to the proposed project as a result of those agency reviews would be reported to the Commission to determine if additional review is required.

For the reasons set forth above, the Commission finds that the proposed project is consistent with Sections 30230, 30231, 30232, and 30240 of the CCMP.

Wetlands

The Coastal Act recognizes that wetlands, estuaries, and adjacent habitat are important coastal resources, supporting numerous wildlife and plant species. California's coastal wetlands provide spawning, nursery, and foraging areas for more than 50 species of marine fish, many of which are important to the sport and commercial fishing industries. Coastal wetlands are also essential wintering habitats for many species of migratory shore birds and waterfowl that use these areas during annual migrations. Further, coastal wetlands are also important because they provide habitat for many state or federal special status species. The Commission has also historically determined that the disturbance or loss of wetlands on federal lands in coastal areas constitute adverse impacts on coastal zone resources.

The proposed overflow channel component of the project would traverse a portion of the landscaped picnic area between the North and Central Lots that is delineated as palustrine emergent wetland. According to NPS, this wetland area is approximately 30,492 sq. ft. (0.7-acre) in size and has minimal ecological function because it is managed as a lawn that is dominated by non-native bermuda grass and is regularly mowed so park visitors can use the picnic tables and barbeque pits within this area. The proposed overflow channel would require excavation of up to a depth of 3.5 feet to construct a shallow, ephemeral bioswale, vegetated with native wetlands plants and grasses. NPS states the creation of the overflow channel and restoration with native species is expected to enhance the ecological function of the wetland. NPS would ensure that wetland hydrology is not adversely affected, with the exception of an approximately 4,356 sq. ft. (0.1-acre) area that would be filled by a portion of the realigned entrance road.

Because of its effects on wetlands, the proposed project is subject to the requirements (i.e.; three part test) of Coastal Act Section 30233(a). The first requirement is that the proposed activity must fit into one of the seven listed categories (i.e.; in the "allowable use" test).

To determine if the proposed fill is for an incidental public service purpose, the Commission must first determine that the proposed fill is for a public service purpose.

Since the proposed modifications to the entrance road and overflow channel would be conducted by a public agency in order to rehabilitate the parking lots and access road for safe public access and recreational purposes at Stinson Beach park, the Commission finds that the fill expressly serves a public service purpose consistent with Section 30233(a)(4). The Commission must next determine if the fill is "incidental" to the public service purpose identified. In the present case, the proposed modifications to the entrance road and overflow channel would be incidental to the primary public service purpose of the proposed project, which is to facilitate continued use of the park for public access and recreational purposes and make the site's public access amenities more resilient to flood hazards. The work would not expand capacity of the park or entrance road. Rather, it will help safely maintain access within the park in its general configuration, provide a wider buffer from the riparian corridor of Easkoot Creek, and improve the quality of the remaining wetland area. The Commission finds that for the reasons discussed above, the fill associated with the proposed work is for an incidental public service purpose, and thus, is an allowable use pursuant to Section 30233(a)(4) of the Coastal Act.

For the second test of Section 30233(a), the Commission must determine if there are feasible, less environmentally damaging alternatives to the proposed fill of wetlands.

The "no project" alternative would lead to continued erosion, degradation and damage to public access amenities (parking lots, access road, pedestrian paths, and picnic/recreation areas) from the unmanaged flow of flood waters across the site when the creek overtops its channel. Alternative flood overflow channel configurations through the park that were considered by NPS, including a more direct path between the creek and beach through the central portion of the park, would result in significant adverse impacts to vegetated dune and backdune habitat that is ESHA. NPS revised the design to contain the proposed overflow channel within the developed portion of the site and to follow the same general path currently used by flood waters but designed to limit flood damage. NPS states the creation of the overflow channel and restoration with native species is expected to enhance the ecological function of the impacted wetlands while also protecting and enhancing adjacent ESHA. NPS would ensure that wetland hydrology is not adversely affected. Access road realignment alternatives were also considered; however, the selected alternative avoids encroachment within ESHA, minimizes fill of degraded wetland within the developed portion of the site, and allows for significant riparian and floodplain habitat restoration and a wider buffer from Easkoot Creek. The habitat creation and restoration benefits of the project within the creek's riparian corridor could not be realized without realignment of the access road and some encroachment into the wetland area. With the measures proposed, the Commission finds that the proposed project is the least environmentally damaging feasible alternative, as required by Section 30233(a).

The third test of Section 30233(a) requires that feasible mitigation measures be provided to minimize the project's adverse environmental effects. NPS states the creation of the overflow channel and restoration with native species is expected to enhance the ecological function of the impacted wetland. NPS would ensure that wetland hydrology is not adversely affected, with the exception of an approximately 4,356 sq. ft. (0.1-acre) area that would be filled by a portion of the realigned entrance road. However, this impact would be fully mitigated by the floodplain and riparian habitat creation/restoration proposed adjacent to the Easkoot Creek (where the entrance road and North Lot would be demolished and

realigned) at a more than 4:1 ratio consistent with that typically required by the Commission.

The Commission therefore finds that wetland impacts would be temporary in nature, and permanent impacts would be fully mitigated, consistent with the wetland protection provisions of Section 30233 of the CCMP.

F. Coastal Hazards

Coastal Act Section 30253 states in applicable 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...

Coastal Act Section 30270 states:

The commission shall take into account the effects of sea level rise in coastal resources planning and management policies and activities in order to identify, assess, and, to the extent feasible, avoid and mitigate the adverse effects of sea level rise.

Stinson Beach park is currently vulnerable to coastal hazards, which are expected to worsen with sea level rise and more frequent extreme weather events. The intent of the project is to reconfigure the parking lots farther away from the most flood-prone areas to provide better protection from erosion and flooding through natural buffer areas and floodwater conveyance. The proposed project has the potential to contribute to erosion and instability if not adequately designed.

The State of California has undertaken significant research to understand how much sea level rise to expect over this century and to anticipate the likely impacts of such sea level rise. Most recently, the Ocean Protection Council (OPC) published and adopted the State of California Sea Level Rise Guidance: 2024 Science and Policy Update, which updates and replaces the previous 2018 State Guidance and synthesizes the best available science on sea level rise and coastal hazards, including the 2022 National Oceanic and Atmospheric Administration (NOAA) Sea Level Rise technical report. The State Guidance also includes guidance and recommendations for incorporating this information into decision-making.³ Notably, it provides a set of scenarios that OPC recommends using when assessing potential sea level rise vulnerabilities for various projects. The 2024 State

³ See OPC State of California Sea Level Rise Guidance, 2024 Science and Policy Update at <https://opc.ca.gov/wp-content/uploads/2024/05/California-Sea-Level-Rise-Guidance-2024-508.pdf>

Sea Level Rise Guidance is currently considered the best available science on sea level rise for the State of California. The updated sea level rise scenarios in the 2024 OPC State Sea Level Rise Guidance suggests sea levels could rise between 1.0 and 6.5 feet by 2100 at the San Francisco tide gauge,⁴ depending on future greenhouse gas emissions and other factors. The OPC Guidance recommends use of the intermediate scenario to inform decisions regarding development that is adaptive and shorter lifespan (i.e., 2050-2075) and for lower consequence situations that are fairly risk tolerant. At the San Francisco tide gauge, the intermediate scenario for 2050 is 0.8-foot, 1.1 feet for 2060, and 1.4 feet for 2070. These projections and recommendations are incorporated in the 2024 update to the Coastal Commission Sea Level Rise Policy Guidance, which was adopted in November 2024.⁵

The project site is located in an area of high flood and shoreline hazards. Portions of the park are immediately adjacent to Easkoot Creek, which is subject to overbank flooding typically as a result of sustained periods of precipitation during winter and early spring. Further, shallow or emergent groundwater conditions exist in low-lying portions of the site during the wet season. The park is also vulnerable to shoreline hazards in which wave overwash from the Pacific Ocean occasionally inundates the northern portions of the site during winter storms and/or extreme tides. For example, an atmospheric river event in January 2023 brought a series of storms with large waves, high ocean levels and heavy rainfall to Stinson Beach. This caused wave runup, creek flooding, and very high and emergent groundwater to damage developed areas of the community, including the NPS public beach parking lots and adjacent areas. The impacts forced the closure of the beach park to vehicle access for three weeks and resulted in reduced visitor facilities.

According to Federal Emergency Management Agency (FEMA) local Flood Insurance Rate Maps, the majority of the site is within a 100-year floodplain, with the seaward portion of the park within Zone VE (1% Annual Chance Flood Hazard, with the highest risk due to storm surge and wave action) and the landward portion of much of the park within Zone AO (1% Annual Chance Flood Hazard - stream or river) (**Exhibit 3**). Additionally, the FEMA 1% Annual Chance Flood Hazard designations do not account for flood hazard risks associated with sea level rise and/or beach erosion, which significantly exacerbate the flood risks to development.

There are vegetated and unvegetated dunes between the beach and the picnic and parking areas that provide the park with some protection from heavy surf caused by storms. However, the rate and severity of shoreline erosion, wave runup, and flooding at the site is expected to worsen with projected sea level rise. Several vulnerability assessments of the broader Stinson Beach area have been prepared within the last decade including the Stinson Beach Adaptation & Resilience Collaboration - Sea Level Rise Adaptation Study (Environmental Science Associates (ESA, 2025), Sea Level Rise Vulnerability Assessment (ESA, 2023), and Stinson Beach Nature-Based Adaptation Study (ESA, 2021). Also, the Stinson Beach Integrated Flood Study (O'Connor Environmental, Inc., 2022) evaluated the individual and combined effects of riverine,

⁴ Ibid.

⁵ <https://documents.coastal.ca.gov/assets/slr/guidance/2024/2024AdoptedSLRPolicyGuidanceUpdate.pdf>

coastal, and groundwater flooding under existing and future sea level rise at the GGNRA Stinson Beach property.

According to the 2022 Stinson Beach Integrated Flood Study, beach width at the site has been observed to fluctuate by up to 136 feet from season to season based on routine monitoring by NPS staff and others and a review of historical shorelines (ESA, 2021). The largest fluctuations typically occur during El Niño years when winter storm and associated waves are the strongest. Monitoring also shows that beach widths quickly recover, even after El Niño years. Previous studies have suggested that under existing sea level conditions most sand eroded during winter storms is stored in longshore bars from where it can readily replenish beaches (O'Connor, 2022).

However, with one to two feet of sea level rise expected in the next 20 to 30 years at this location under the intermediate and intermediate-high scenarios, coastal storm wave runup is expected to become more extensive and beach widths are expected to become narrower under average conditions with the potential to erode completely during intense winters and individual storms. With narrowing of beach widths and diminishing seasonal beach recovery, dune retreat is also expected. With three feet or more of sea level rise, expected by 2080 under the intermediate-high scenario, greater extents of the park will become vulnerable to coastal storm flooding, wave runup, and shoreline erosion, with significant loss of the winter beach and dune retreat.

In terms of flooding, the 2022 Stinson Beach Integrated Flood Study states:

Issues with flooding are well documented along Easkoot Creek. Several studies have delineated the extent of flooding for current sea levels including a flood risk study by FEMA and a flood hazard evaluation prepared by OEI for the Marin County Water Conservation District in 2013. Based on hydraulic modeling performed by OEI, Easkoot Creek contains the 2-yr recurrence interval flood within the GGNRA but limited overbank flooding occurs on private property near Calle del Pinos and Calle del Recasa. At flows of 200-cfs or greater, roughly equivalent to the 5-yr recurrence interval flood event, flooding begins to occur on the GGNRA property adjacent to the Parkside Café. Flows overtop the left bank in two locations with overland flows flowing down Marine Way into the north parking lot. During the 10 to 100-yr recurrence interval events, flows breach the dunes near the north parking lot and flow into Bolinas Bay.

Ongoing improvements are being made to reduce the impacts of flooding from Easkoot Creek within the park. A sedimentation basin within the banks of Easkoot Creek on NPS property was constructed in 2013 to maximize flood control in the portion of the creek that has been historically channelized while protecting habitat values and creating a floodplain terrace to allow sediment to drop out and be easily removed before reaching the lower reaches of the creek. In addition to the sediment basin, sediment accumulation is also managed by periodic localized dredging near the various bridges crossing the creek. However, coastal and riverine flooding continue to affect portions of the park despite these measures and have led to significant degradation of the parking lot facilities. In a 20-year flood event, overbank flows are expected to occur on both sides of the creek in the vicinity of the sediment basin under existing conditions and with 1.6 feet of sea level rise. Most of

the overbank flows will continue to occur on the left bank and through the northern portion of the park.

In addition, shallow and/or emergent groundwater conditions currently exist across the majority of the site. Emergent groundwater is mostly limited to the unimproved area between the parking lots following large storm events. The footprint of emergent groundwater shrinks significantly during summer when groundwater elevations are 2-3 feet lower than winter elevations. With 1.6 feet of sea level rise, emergent groundwater during winter occurs in portions of all three parking lots as well as the majority of the two picnic/unimproved areas between lots (O'Connor 2022).

According to the CoSMoS coastal hazards tool that considers future flood hazards, shoreline retreat and erosion, the subject Stinson Beach park site would experience increased flooding and wave runup extent under various near-, medium-, and long-term scenarios. Particularly in the northern and southern ends of the park, CoSMoS shows increased flooding and maximum wave runup extent with 0.8 feet of sea level rise (expected by 2050) combined with various storm conditions (annual storm event to 100-year storm event), and more significant inundation with 3.3 feet of sea level rise combined with a 100-year storm event (expected by 2080 under the intermediate-high scenario) (**Exhibit 5**). Thus, future flood and wave runup elevations (as well as groundwater elevations) will increasingly affect portions of the park during the next 25 to 50 years.

The proposed project is a coastal hazard resiliency project in that most project components will reduce flood vulnerabilities within the park, especially considering sea level rise, by adjusting the configuration of the parking lots and portions of the entrance road to provide a wider natural buffer along portions of the creek and dunes and to better convey creek overflow floodwaters across the site to reduce future damage. Portions of the North Lot have already naturally retreated due to damage from coastal hazards. The proposed project includes 0.3 acres of dune/dune scrub restoration and 0.3 acres of floodplain restoration in the North Lot to serve as a buffer against flooding and enhance ecosystem resilience. With realignment of the main access drive near the Central Lot, the proposed project includes 0.2 acres of riparian habitat restoration alongside Easkoot Creek. In the South Lot, 0.5 acres of dune habitat restoration is proposed along 715 linear feet of beach shoreline. No coastal armoring is proposed and existing dune and riparian habitats adjacent to park infrastructure would remain in place.

Strategic retreat of threatened infrastructure is a preferred alternative to shoreline protective structures. Shoreline protective devices can have a variety of negative impacts on coastal resources including adverse effects on shoreline sand supply, scenic qualities, natural landforms, and overall shoreline beach dynamics on and off site, ultimately resulting in the loss of beach. When a shoreline is armored with a shoreline protective device, the natural exchange of material from the armored area to the beach or shoreline area and offshore sand supply system is interrupted. In addition, if the shoreline area would have otherwise eroded, there is a measurable loss of material to the beach, shoreline, and offshore sand supply system as a result. In contrast to hard solutions, the proposed managed retreat and dune restoration is more resilient approach to climate adaptation that incorporates ecological principles to support multiple benefits, including hazard adaptation and mitigation, natural resource resilience and enhancement, and

recreation and scenic resource preservation.

The project also includes construction of an overflow channel to carry occasional high storm overflows from Easkoot Creek through the park. The proposed overflow channel is located within the developed portion of the site and in the same general path currently used by flood waters but designed to limit damage to park infrastructure. According to NPS's Draft Hydraulics Report (Atkins, 2023), proposed improvements include a proposed low water crossing along the realigned entrance road, a shallow, wide bioswale channel, and curb reconstruction to safely route overtopping flows from Easkoot Creek across the site to the beach through the North Lot. The North Lot includes a curb and gutter design that acts as a concrete channel to route the large overtopping flows from the proposed bioswale channel to the existing beach outfall. The North Lot would also be concrete-paved and include toe walls on the upstream and downstream edge of the lot to prevent deterioration of the parking lot and protect the adjacent dunes. Buried riprap would be added to the existing outfall within an existing disturbed area of the North Lot and planted to minimize erosion during flood flows.

The project would result in an overall improvement in on- and off-site flooding according to NPS's hydraulic analysis. In addition, the overflow channel is designed to not detract from creek flows that sustain the ecology downstream. Stormwater infrastructure in all three parking lots would be upgraded following stormwater best management practices (BMPs). Drainage inlets and associated culverts to be replaced would be appropriately designed to withstand expected flows and avoid increasing flood risks to downstream properties north of the Stinson Beach parking area.

The project has been designed to more safely convey runoff and floodwaters across the site without increasing flood hazards on adjacent parcels to a higher degree than currently occurs, thus decreasing the risk to life and property from flood and coastal hazards without shoreline armoring, consistent with Coastal Act Section 30253. In addition to minimizing risk from hazards, the proposed project incorporates various measures to ensure that it does not contribute significantly to erosion. Drainage infrastructure associated with the parking lot improvements would be designed to minimize erosion and ensure stability. To further ensure that project-related erosion is minimized, NPS would implement water quality protection best management practices and adhere to the approved Construction Stormwater General Permit and Stormwater Pollution Prevention Plan for achieving compliance with stormwater regulations. NPS proposes to install erosion control measures to prevent runoff of sediment or sediment-laden water from the site into adjacent waterbodies. Prior to commencement of construction, the NPS would provide final project plans that reflect final design of the overflow channel, which would be vegetated with wetland plants and grasses and use natural elements including boulders to the maximum extent feasible in consideration of public recreation use (picnicking and access) and maintenance needs. In addition, the final plans would include final drainage, erosion control, and polluted runoff control features that serve to minimize stormwater runoff, control erosion, and effectively prevent the transport of contaminants to habitat areas and the marine environment and support long-term improvements in coastal water quality.

Even though the project would serve to reconfigure some portions of site development further away from coastal and flood hazard areas and provide better protection from

erosion through dune restoration and natural buffer areas, the park remains extremely vulnerable to coastal hazards in consideration of sea level rise and extreme weather events. NPS regularly monitors site conditions, including spring and fall beach width and elevations at Stinson Beach via periodic surveys, and would continue to do that in order to identify vulnerabilities early and adaptively manage the park. NPS would also continue to work with the County and local stakeholders on coastal resiliency efforts to maintain public access and protect the park's natural resources.

For the reasons described above, including with the site condition monitoring and adaptive management, the Commission finds that the proposed project is consistent with Section 30253 of the CCMP.

G. Visual Resources

Coastal Act Section 30251 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 landforms, 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.

The Coastal Act provides that the scenic and visual qualities of coastal areas are resources of public importance that must be protected, and that permitted development is required to protect public views and be designed to be visually compatible with the surrounding area.

The proposed project to rehabilitate the parking lots and associated drainage facilities, as well as habitat restoration, would be located within the footprint of existing development. Overall, the proposed project would maintain existing scenic views and the visual character of the beach park and surrounding natural habitats. The proposed development would improve and maintain existing parking lot facilities and would not increase their capacity or result in adverse public view impacts. Highway 1 nearby is a scenic road; however, the project would not substantially change how Stinson Beach park looks or is perceived by the traveling public. Therefore, the Commission finds that the proposed development is Section 30251 of the CCMP.

H. Archaeological and Tribal Cultural Resources

Coastal Act Section 30244 states:

Where development would adversely impact archaeological or paleontological resources as identified by the State Historic Preservation Officer, reasonable

mitigation measures shall be required.

Coastal Act Section 30244 states that reasonable mitigation measures shall be required where development would adversely impact identified archaeological resources. Coastal Act Section 30244 states that reasonable mitigation measures shall be required where development would adversely impact identified archaeological resources. Though the focus of the policy wording is on archaeological resources identified by the State Historic Preservation Officer (SHPO), since adoption of its Tribal Consultation Policy in 2018, the Commission has consistently recognized the importance of protecting archaeological resources broadly defined as tribal cultural resources, including sites, features, places, cultural landscapes,⁶ sacred places, and objects with cultural value to California Native American tribes, including those that are included or determined to be eligible for inclusion in the California Register of Historical Resources and those included in a local register of historical resources as defined in Public Resources Code Section 5020.1(k). Tribal cultural resources may also include historical resources described in Public Resources Code Section 21084.1, a unique archaeological resource as defined in Public Resources Code Section 21083.2(g),⁷ or a “nonunique archaeological resource” as defined in Public Resources Code Section 21083.2(h).⁸

The Commission acknowledges Tribal sovereignty and understands that California’s Tribes have long served as stewards of important coastal resources. The Tribes possess unique and valuable knowledge and practices for conserving and managing these resources in a sustainable manner, and in a manner consistent with the spirit and intent of the Coastal Act. The Commission’s Tribal Consultation Policy recognizes the importance of State efforts to protect Tribal Cultural Resources and improve communication and coordination with Tribes. It establishes a tribal consultation process that is fully consistent with, and complementary to the nature of, the Commission’s goals, policies (including Section 30244), and mission statement.

NPS engaged in consultation for the proposed action under Section 106 of the National Historic Preservation Act with letters to the State Historic Preservation Office and Tribal Heritage Preservation Officer for the Federated Indians of Graton Rancheria on September 4, 2024, and that consultation is ongoing. NPS states that there are no known archaeological sites or paleontological resources within the Stinson Beach developed area based on record searches or identified during consultation. The proposed project would be constructed on previously disturbed areas of the park, making discovery of unidentified cultural materials or human remains unlikely to occur.

⁶ A cultural landscape is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.

⁷ As defined in that section, “unique archaeological resource” means an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria: (1) contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information; (2) has a special and particular quality such as being the oldest of its type or the best available example of its type; (3) is directly associated with a scientifically recognized important prehistoric or historic event or person.

⁸ As used in this section, “nonunique archaeological resource” means an archaeological artifact, object, or site which does not meet the criteria in subdivision (g).

Nonetheless, NPS states the proposed action will include measures to ensure that no archaeological or paleontological resources previously unknown are damaged during construction activities as well as other mitigation measures developed during consultation. With this consultation review process in place, the Commission finds that the proposed project is consistent with the cultural resources policy of the CCMP (Coastal Act Section 30244).

Consistent with the Commission's Tribal Consultation Policy, Commission staff reviewed the tribal consultation undertaken by NPS. Commission staff wrote to the tribal representatives and individuals identified by the Native American Heritage Commission (the Federated Indians of Graton Rancheria) and that consulted with NPS to inform them of the subject consistency determination on December 8, 2025, and again on May 21, 2026 and July 16, 2026. On July 17, 2026 staff received a request for formal consultation from the Tribal Heritage Preservation Officer of the Federated Indians of Graton Rancheria, and a consultation meeting is scheduled for July 27, 2026.

Based on the findings of NPS, the tribal consultation and outreach performed by NPS and the Commission to-date, as well as the cultural resource protection protocols that would be implemented by NPS as part of the project, the Commission finds that the proposed project includes reasonable mitigation measures to protect archaeological or paleontological resources consistent with the cultural resources policy of the CCMP (Coastal Act Section 30244).

V. SUBSTANTIVE FILE DOCUMENTS

1. NPS Consistency Determination File No. CD-0008-25
2. FEMA National Flood Insurance Program, Flood Insurance Rate Map, dated July 2015.
3. USGS Coastal Storm Modeling System (CoSMoS) at <https://ourcoastourfuture.org/hazard-map/>
4. California Ocean Protection Council, State of California Sea Level Rise Guidance, 2024 Science and Policy Update at <https://opc.ca.gov/wp-content/uploads/2024/05/California-Sea-Level-Rise-Guidance-2024-508.pdf>
5. California Coastal Commission Sea Level Rise Policy Guidance (2024 Update) at documents.coastal.ca.gov/assets/slr/guidance/2024/2024AdoptedSLRPolicyGuidanceUpdate.pdf
6. Stinson Beach Adaptation & Resilience Collaboration - Sea Level Rise Adaptation Study by Environmental Science Associates (ESA), 2025.
7. Stinson Beach Adaptation & Resilience Collaboration - Sea Level Rise Vulnerability Assessment, by ESA, 2023.
8. Stinson Beach Nature-Based Adaptation Study, by ESA, 2021.
9. Stinson Beach Integrated Flood Study, by O'Connor Environmental, Inc., 2022.
10. NOAA, 2005. Endangered and threatened species; designation of critical habitat for seven evolutionarily-significant units of Pacific salmon and steelhead in California. Federal Register. 70 (170):52488-52627.