

## **PROJECT DESCRIPTION-LAWSON’S LANDING, INC.**

### **Introduction:**

The Lawson family property includes approximately 960 acres of coastal dune, wetland, and hillside lands just east and south of the town Dillon Beach. Ranching and limited recreational visitor serving activities were present on the project site when it was acquired by the Lawson family in the 1920’s. Land use has historically been primarily associated with agricultural operations including cattle and sheep grazing and hay production. The Lawson’s Landing Reconfigured and Reuse Master Plan alternative submitted to the County of Marin in April 2008 continues to support agriculture as the primary land use for approximately 780 acres, as established historically. All sand quarry operations have been terminated and none are planned for the future. The continued agricultural use is consistent with the County of Marin Local Coastal Plan, Dillon Beach Community Plan and the Coastal – Agricultural Preserve Zoning and none of this portion of the property is within the Coastal Commissions retained permitting jurisdiction.

This Precise Development Plan addresses proposed facilities and uses for reconfigured and reduced use (from approximately 90 acres to less than 45 acres) of the Lawson’s Landing segment of the Lawson family property. This 45 acre area near the waterfront has been used historically for low cost visitor serving recreational use consistent with the County of Marin Local Coastal Plan Unit II, the Dillon Beach Community Plan and the Coastal – Recreational Commercial Resort zoning. The governing policy plans and the zoning noted above were adopted by the County of Marin and certified by the California Coastal Commission (CCC) in the late 1980’s. More recently the Coastal Commission granted Lawson’s Landing a Coastal Development Permit (CDP) in 2011 and an Amendment to that CDP in October of 2020.

Lawson’s Landing wastewater system plan was also approved by Regional Water Quality Control Board (RWQCB) Feb. 22, 2020.

### **Coastal Dependent – History of Low Cost Visitor Serving Recreational Use**

As noted above, since the 1920’s a portion of the Lawson property has been used for coastal dependent lower cost visitor serving recreational use. In the 1930’s and 1940’s sand dune stabilization was initiated by the US Soil Conservation Service. As the dunes began to stabilize and increase camping opportunities, the fishing, camping and boating activities at Lawson’s Landing intensified. Informal campsites were established in and along what is known today as the Sand Point and Sea Wall areas. In the 1950’s travel trailers were brought to the Sand Point area. The Lawsons responded to the public demand for coastal related low cost visitor serving recreational uses by improving their property with fishing and clamming opportunities including boat rentals, boat launching services, year-round trailer parking and camping.

### **Changes in use with 2011 CDP**

The 2011 CDP eliminated year-round trailers and limited the length of stays at Lawson’s Landing to a maximum of 2 weeks. This is consistent with Coastal Act policy to encourage making coastal overnight stays accessible to the public and not limited to exclusive private use.

### CDP approved number of campsites and projected number

Lawson’s Landing has an HCD permit since 1992 for 1000 lots without drains and 233 lots with drains that previously served over 200 year round trailers. CCC Staff Findings of the 2011 CDP indicated that “the Commission is approving the project with conditions that will result in a project that both provides

significant public access and recreation at Lawson's Landing that will meet current and future demand for this resource (approximately 650 sites over 33.5 acres)".

However, numerous CDP buffer constraints for wetlands, dune scrub, and other environmentally sensitive areas have made it impractical to fit more than 375 campsites (along with necessary roads, restrooms, and other essential support services) into the roughly 33 acres of approved camping and recreation area.

#### Campsites with hookups

Under this CDP, 20 campsites with hookups to wastewater, power, and water are allowed in Areas 1 and 2. The CDP uses the terminology "with drains" in reference to wastewater hookups, but this is understood to also include power and water as the standard practice at RV Parks. Sites without drains are also often referred to as "dry" campsites.

All other sites under this CDP are approved for either tents or transient RVs with the exception of Area 3, where only walk-in tent sites are allowed "between the dune scrub vegetation that comprises the relict patch of foredune." There are a few RV sites possible along the road in Area 3.

Campsites with hookups are not anticipated in Area 3 or 4 and not specified in Lawson's Landing CDP.

RVs are designed in many configurations. They include RVs designed to look like cottages and stay in one location, while being built on a framework of axles with wheels. Hence these cottage-like RV can be moved or towed and are not permanent structures. Such RVs are known as Park Model RVs or Park Model Cottages. Lawson's Landing is planning to site 20 Park Model Cottages (hereafter referred to as cottages) in the 20 sites currently approved for hookups.

#### Additional future hookups and cottages

CCC Staff indicated 9/16/16 that, "we could support an amendment application that asked for 8 additional cottages and 100 RV sites with drains in Area 2 as long as you submit supporting materials to demonstrate that the proposed wastewater system would be adequately sized to serve 100 additional RVs with drains." The RWQCB approved wastewater system has been designed for interim build-out of 30 cottages with hookups and 40 RVs with hookups and 292 campsites without hookups (for a total of 362 campsites) along with restrooms, store, and other requirements. This additional wastewater system capacity would at a minimum provide for 50 additional hookups beyond the current 20 approved hookups.

RVs typically have on-board restroom facilities with an on-board holding tank. Lawson's Landing has a dump station for RV wastewater. RVs without a hookup typically empty their holding tanks to a dump station before leaving an RV park. Due to current EPA requirements, RV dump wastewater can't be conveyed to the treatment plant approved for Lawson's Landing. This EPA requirement relates to chemicals, which in the past were prevalent in RV holding tanks. This regulation is questionable, since RVs can be connected by hookup to a wastewater system such as the RWQCB approved one at Lawson's Landing. However, once the RV wastewater is dumped into a RV dump station, it can't be treated in the wastewater system at Lawson's Landing.

New RV parks today mostly have RV hookups at their campsites. Additional RV/cottage hookups at Lawson's Landing will be environmentally sound because RV hookup wastes can be conveyed to and treated at the new on-site wastewater treatment system. This on-site treatment is far preferable to current hauling of wastewater to remote locations, like Oakland, for processing.

The wastewater volumes projected in the RWQCB approved Report of Waste Discharge (ROWD) are based on standard water fixtures. Lawson's Landing is planning higher efficiency fixtures and other water saving

measures. Hence it is likely that there will wastewater system capacity for more than the above projected 50 future additional hookups. This will allow greater reduction of wastewater hauling to remote locations for processing with associated unnecessary carbon emissions.

Also if RV hookup sites get converted to cottages later, this will provide environmental benefit of over night stays by guests with smaller, less energy and carbon intensive vehicles. Lawson's Landing's CCC Staff approved Traffic Management Plan includes use of shuttles to reduce need for private vehicles: "It is anticipated that camping groups brought by shuttle from outside the area would stay within the cottages that would be developed at the hookup sites. These cottages would be well equipped to meet the daily needs of guests so the need to bring equipment and other large items that may require a private vehicle would be largely eliminated."

### **Marin County Master Plan, CDP, PDP – Goals and Objectives**

The Marin County Master Plan and Coastal Development Permit (CDP) protected environmental resources and preserved coastal dependent lower cost visitor serving recreational use. Consistent with this, the PDP seeks continued use of approximately 40 acres for visitor-serving recreational uses including 33 acres of camp area.

The EIR adopted by the County of Marin on March 18, 2008 does not show significant adverse impacts on natural resources resulting from the recreational activities. The Lawson family is committed to continued management of their property, which balances environmental stewardship with historical lower cost visitor-serving recreational uses in compliance with governing policies and regulations.

It is the goal of this PDP to preserve and protect the environment and continued lower cost visitor serving coastal recreational use of a small portion of the Lawson's Landing property, which is approved in the Coastal Commission's jurisdiction.

The permit objective is to secure a future for the Lawson's Landing recreation use that allows the owners to continue to be good stewards of their property while recognizing the economic realities of A) staffing and running a low cost visitor serving recreation facility and B) funding for necessary improvements such as the new wastewater system for the further protection of the environment.

### **Master Plan and CDP substantial conformance**

As indicated in the attached Table Master Plan Conditions of Approval and CDP Alignment, there is consistency throughout in the intent and overall approach of the Conditions of both the Master Plan and CDP. The main differences are that the CDP is more stringent and/or limiting overall in its:

- 1) reduction of acres of land allowed for campground-related uses and in particular it's removal of Camp Areas 5, 7, and 8,
- 2) having more extensive buffer areas (such as a 300 ft. California red-legged frog buffer vs. 200 ft. CRLF buffer),
- 3) complete removal of over 200 year round or "permanent" travel trailers,
- 4) use Area 6 required CCC acceptance of evidence of prior authorized development followed by a now approved Amendment to the CDP,

- 5) permanent protection of the more than 450-acre wetland-dune complex as a conservation easement area,
- 6) Protection Restoration and Enhancement Plan (PREP) requirements, which are more extensive and time intensive than the Adaptive Management Plan of the Master Plan; this PREP requiring substantially more restoration particularly in Restoration Areas A, B, and C, and also requiring measures to increase inundation and soil saturation of wetland complex,
- 7) the maximum number of day use visitor vehicles shall not exceed 100, while MP maximum number of day use visitor vehicles was 200, and
- 8) camping stay maximum of 14 consecutive nights.

The CDP findings indicated that up to 650 camp lots would be allowed. The Master Plan would have allowed a permanent maximum number of campsites to of 534.

However the number of proposed camp lots in all areas was largely determined by CDP wetland, CRLF, and dune scrub buffer requirements. Within the spatial limitations of these buffers, the Lawson family also finds it necessary to provide A) safety in movement of large vehicles, and B) reasonable sized campsites and a comfortable camping experience for their guests. As a result of these factors, the family is projecting a maximum feasible number of 389 camp lots.

The limits in the amounts of camp lots, length of stay, day use parking, and requirements for environmental protection can be adhered to while still providing visitor serving improvements and amenities--such as water, power and other utilities, food and recreational supplies, etc. that are compatible with the intent of the MP and the CDP.

Altogether, it is clear that the CDP and proposed plans for Lawson's Landing will provide the same or greater amount of environmental protection and reduction of campsites as the Marin County Master Plan while still providing needed lower cost coastal overnight access. Lawson's Landing had a historically established maximum capacity of 1,000 campsites, 200-day use permits, and 233 camp lots with drains (or hookups). Under the proposed project, the maximum number of camp lots is decreased to 389 and, the number of day use permits is decreased to 100. The recreational area has been reduced by more than 32 acres (42 percent) to provide additional open space area and greatly expands protected environmentally sensitive area.

### **Time frame**

Due to the appeal of the Master Plan to the California Coastal Commission, the Master Plan could not be implemented. Lawson's Landing's Coastal Development Permit (CDP) was published in January 2012. Following approval of the CDP, in requesting a scientific review panel (SRP) to supplement the planning process CCC staff indicated on Oct. 12, 2012: "We realize that convening a scientific review panel will delay the condition compliance process further. The Commission's Executive Director has the ability to extend the permit's deadlines in order to grant additional time for condition compliance for good cause." The scientific review panel process took over 6 years and consequently pushed back all CDP time frames and deadlines as acknowledged and accepted by CCC staff. This would appropriately result in a tolling or adjustment of the time frames of the Master Plan.

### **Summary conclusion**

Given all these factors, it was reasonably be found that consolidation of the County of Master Plan (MP) with the California Coastal Commission CDP should be continued with as intended. Accordingly, permits for

improvements can then be processed with California Housing and Community Development (HCD) and a PDP can be issued consistent with the MP and CDP.

### **Additional use-Permanent Residential Use**

The Lawson property located in the CDP permit area includes permanent residential housing. Four existing manufactured homes will remain to house family members and employees. Seven trailers or park model RVs are currently used by employees. These residences provide on-site affordable housing for Lawson family members and Lawson's Landing employees.

### **Uses in Respective Camp Areas**

1. **Area 1** is primarily a campsite area for RVs and tent sites. Consistent with all ESHA buffer requirements it will also include:
  - A. One restroom initially, which will meet HCD requirements for number of toilets, sinks, and showers per respective number of camping sites.
  - B. A second restroom is included in the PDP plan to allow more restroom accommodations in the future as needed. The restrooms will be connected to the facility-wide wastewater system.
  - C. The new RWQCB Septic Tank Effluent Pump (STEP) wastewater system will be installed with collection and effluent tanks and pumps to serve the restrooms.
  - D. Vehicle parking for up to 19 cars.
  - E. Area 1 will also have a lighting system, which meets HCD minimum light levels for safe ingress and egress, yet consistent with CDP Conditions, does not shine into any adjacent environmentally sensitive area.
  - F. Native riparian plants shall be planted along and immediately adjacent to the edge of the wetland to provide additional visual screen.
  - G. Fencing that physically excludes people or pets or symbolic fencing, and informational signs shall be constructed around all wetlands and ESHA to prevent intrusion of people and domestic animals into the habitat areas.
2. **Area 2**, near the beach, is the visitor-serving hub of Lawson's Landing. It also has RV and tent campsites. Some of the campsites with drains/hookups will be occupied by RV Park Model Cottages. The pier has been removed from Area 2 due to unsafe conditions under a California Coastal Commission Permit. Consistent with all ESHA buffer requirements, visitor serving recreational use support facilities in Area 2 will include:
  - A. The existing Store and associated storage would remain in the Area 2 Boat House.
  - B. The Administrative office will remain in the Area 2 Boat House for now. In the future, this office space may be replaced with a café and administrative services could be moved to a small building in Area 2 and/or the small office in the Emergency Services building in Area 2.
  - C. Boat launching at the Landing beach would continue in the existing location.

- D. Vehicle parking for up to 63 cars is planned to remain at the existing site (See CSW/ST2 Sheet C3.1) adjacent to the existing Boat house store.
  - E. Temporary boat trailer parking for up to 17 launched boats is planned.
  - F. 2 new restrooms with showers are planned for Phase 1 to meet HCD requirements and 2 additional restrooms with showers may be added to Area 2 in the future as needed. (See CSW/ST2 Sheet C3.1 for restroom locations). At least one restroom will have coin-operated washing machines and dryers.
  - G. The new RWQCB Septic Tank Effluent Pump (STEP) wastewater system will be installed with collection and effluent tanks and pumps to serve the restrooms, boathouse, and Park Model cottages.
  - H. All of the existing water lines would remain in the interim and would be replaced over time with a new water system.
  - I. Electric utilities would be replaced as part of the new wastewater system and associated pumps, cottages and new lighting system as described above in Area 1. See CSW/ST2 Sheet C5.1
  - J. Initially 20 Park Model cottages will be located in Area 2 as shown in CSW/ST2 Sheet C3.1. Cottage sites will be used as RV hookup sites until the cottages are purchased and installed. Additional cottage and RV hookup sites are anticipated to be added in the future, within capacity of the approved wastewater system following an approved CDP Amendment.
  - K. 12 electric vehicle charging stations will be located west of the boathouse as shown in Sheet C3.1.
  - L. A landscaped picnic area will be improved upon east of the boathouse as seen in Sheet C3.1.
  - M. One or more food trailers/trucks would be located near the boathouse and limited commissary support improvements would be made in the boathouse store counter and sink area.
  - N. A propane tank in Area 2 will provide for propane sales to campers and RVs as seen in CSW/ST2 Sheet C3.1.
  - O. Tomales Fire Dept. will have an emergency boat in an emergency boat storage modular small shed as seen in CSW/ST2 Sheet C3.1.
3. **Area 3** is primarily a campsite area for walk-in tent sites. Consistent with all ESHA buffer requirements it will include:
- A. Walk-in tent sites.
  - B. Parking along the main road as approved by CCC and seen in CSW/ST2 Sheet C3.2.
  - C. A few potential RV sites along the main road.
  - D. Two restrooms as shown in CSW/ST2 Sheet C3.2.
  - E. The new RWQCB Septic Tank Effluent Pump (STEP) wastewater system will be installed with collection and effluent tanks and pumps to serve the restrooms.

- F. Lighting system as described above in Area 1.
4. **Area 4** is primarily a campsite area for RVs and tent sites. Consistent with all ESHA buffer requirements it will include:
- A. RV and tent sites
  - B. Parking along the main road.
  - C. Two restrooms as shown in See CSW/ST2 Sheet C3.4.
  - D. The new RWQCB Septic Tank Effluent Pump (STEP) wastewater system will be installed with collection and effluent tanks and pumps to serve the restrooms.
  - E. Lighting system as described above in Area 1.
5. Area 5 has been restored as part of Restoration Area C.
6. Area 6 is the most complex area in terms of improvements including the following:
- A. A wastewater secondary treatment plant, such as recirculating filter system (AdvanTex® AX-MAX or equivalent) is proposed for Area 6. This system will consist of about 1,000 square feet of mostly buried equipment and a small control room with a building footprint of about 100 square feet.
  - B. Underground leachfield areas for subsurface wastewater disposal, to be used in combination with wet season subsurface drip dispersal area and dry season spray irrigation of an approximately 6-acre pasture, which is about 300 feet and  $\frac{3}{4}$  of a mile uphill. The Area 6 leachfields will be covered by permeable pavers in order to provide needed parking.
  - C. Lift station to pump secondary treated wastewater suitable for recycling to wet season subsurface drip dispersal area and dry season above ground spray irrigation area uphill.
  - D. Landscaping improvements, including around existing Gate House and entrance to the property.
  - E. New Emergency Equipment Storage building for water truck, front loader, and emergency generator. This emergency equipment storage building will also include bathrooms and storage for hazardous materials, bicycles and mechanical repairs.
  - F. Emergency Services building with small office and bathrooms. The small office would house the emergency services central command center. This small office will also provide for processing guests consistent with requirements of the Traffic Management Plan CDP Condition and Lawson's Landing's approved Traffic Management Plan.
  - G. The Emergency Equipment Storage building and Emergency Services building with small office and bathrooms are proposed in the west side of Area 6 in undisputed permitted area. These buildings have been reduced to the minimum size necessary for essential CDP-mandated services to support lower cost coastal access. The 2017 Amendment, supported by Coastal Commission staff, proposed 15,000 square feet of new buildings consistent with the Marin County approved Master Plan. This revised Amendment is proposing less than 4,000 square feet of new buildings in Area 6 along with associated required parking. These very limited Area 6 improvements are needed to meet CDP requirements and support affordable coastal access.

- H. Equipment maintenance, repair, parking (including for processing guests), and storage have been ongoing in this area since well before the Coastal Act. Some guest parking will be provided on the west side of Area 6. Guest processing parking for shuttles would be located on the east side on permeable pavers over leachfield. At this shuttle parking location, some bikes and electric carts would be rented under a canopied area with solar collectors and nearby electric vehicle charging station.
- I. The existing equipment sheds on the north side of the eastern part of Area 6 have been removed and restoration of that area is underway. Similarly the boat repair tents have been removed and restoration of that area is underway.
- J. The truck shed will be removed and that area will be restored. Until it's removed and grading occurs to its' west, the sliding doors on either side of the truck shed will provide emergency vehicle access between the east and west sides of Area 6.
- K. Part of the restoration of these areas includes restoring to natural gradual slopes similar to original topography.
- L. These gradual natural slopes will integrate with gradual changes in elevation necessary for the new buildings and their required parking and associated turning radii on the west side of Area 6. (See attachment CSW/ST2 Composite Plan Sheet C2.1 and Sheet C3.0.)
- M. Consistent with Marin County Fire Marshall recommendations, the intersection of the Main Entrance Road and Sand Haul Road will be hardened for turning.
- N. The roofs of the new emergency services/office and storage buildings would have photovoltaic solar collectors . There will be one or more electric vehicle charging stations at parking spots near the emergency services building.
- O. Five (5) free public parking spaces will be provided just outside the entry gate on the west side of the road.
- P. Also as part of this Amendment package, an emergency boat storage building will be located in Area 2 near the waterfront. Marin County Fire Department, Tomales Station is the first responder in this area. There have been a number of drownings in Tomales Bay, and the chances of saving those from capsized boats would be increased by having an emergency boat near the waterfront. This is referred to as Building 4 in the architectural plans.
- Q. A new agriculture barn uphill, off of Sand Haul Road, will be built for storage of hay and agriculture equipment that is currently stored in the Area 6 Truck Shed. This building will help sustain agriculture on Lawson's agriculture land. This is referred to as Building 5 in the architectural plans. The roof of this building is designed to maximize solar collector space with appropriate south sloping orientation.
- R. As part of efforts to move toward renewable electricity for carbon emission reductions, electric vehicle charging stations in Area 6 will be supplemented with electric vehicle charging stations in Area 2.
- S. Due to the space limitations of Area 6, some bike rental and storage space has been moved to Area 2. See attached Area 2 landscape plan.

- T. As part of the CDP Traffic Management Plan requirements for measures to avoid off-site trips, a food truck or trailer will be located in Area 2. In the future, more permanent food facilities will be developed.

### **Reasons to Locate Key Facilities in Area 6**

Lawson's Landing is seeking to make feasible the continuance of a family owned business, which provides affordable coastal access and water-dependent recreation. In order to meet (Coastal Development Permit) CDP Conditions requirements, the year-round trailers, a very large portion of prior income, was eliminated. While this income was lost, massive costs will be incurred in major improvements in infrastructure and utilities, including a new wastewater system. Together these elements pose significant challenges to preserving this family-owned affordable coastal access facility.

In the context of preserving affordable coastal access, there are a number of compelling reasons to locate key facilities and services in Area 6. Primary among those reasons are the CDP Conditions themselves, which require key specified facilities and services. Area 6 can provide these facilities and services through redevelopment of previously developed areas in the least resource intensive and most environmentally sound manner. Lawson's Landing is proposing redevelopment only in areas where submitted evidence of prior authorized development has never been refuted.

The Emergency Services building with small office and Emergency Equipment Storage and other essential storage building is now all proposed on the west side of Area 6 in area that has been undisputed for redevelopment.

These proposed improvements are in keeping with CDP Conditions, are shown in the attached drawings and itemized in relationship to specific CDP Conditions:

#### **A. Wastewater system-Condition 7**

In July 2011, the California Coastal Commission approved a Consolidated Coastal Development Permit for a recreational and agricultural improvement project at Lawson's Landing in Dillon Beach. The permitted project included, "A wastewater treatment plant [that] would produce advanced secondary treated effluent, suitable for water recycling with a subsurface drip dispersal system and for spray irrigation of five to six acres of pastureland." However, the CDP's Adopted Findings noted that, "The specific design and location of the wastewater treatment plant has not been determined by the Applicants...the proposed wastewater disposal system is only conceptual at this time, and its design will be further refined through the Regional Water Quality Control Board [RWQCB] approval process."

The wastewater system design has been refined since 2017, in consultation with the RWQCB, after extensive additional research. The system consists of a collection system, a treatment system, and disposal (via leach fields, a lift station, drip dispersal and spray irrigation). The newly revised—and environmentally sound—wastewater proposal utilizes part of Area 6 for portions of the system, rather than undisturbed pastureland, and requires an amendment as indicated in the original CDP.

Consistent with Lawson's Landing CDP Condition 7 (Wastewater Treatment and Disposal System Plan), a wastewater system lift station at the base of Sand Haul Road would appropriately be located either near or within Area 6. This lift station was shown on Adobe Sheet 8 which is referred to in the CDP Condition 7A, Wastewater Treatment and Disposal System. This lift station would pump wastewater effluent to a previously studied wastewater dispersal site (Scale House area), which is located uphill, 300 feet in elevation above the lift station almost half a mile away.

Area 6 is also the logical location for the wastewater treatment component of the wastewater system since it would be preferable to have secondary treated wastewater that is suitable for recycling pumped up the hill, rather than pumping only primary treated septic tank effluent uphill. An advanced secondary treatment plant, such as a recirculating filter system (AdvanTex® AX-MAX or equivalent), is proposed for Area 6. This system will consist of combination treatment/storage tanks, one or more AX-MAX treatment units having integrated recirculation-blend tanks and AdvanTex® textile filters and associated pumps and piping occupying an area of about 10,000 square feet, plus a small control building with a footprint of about 100 square feet. The main difference in the treatment configuration is the proposed use of the AdvanTex® AX-MAX system, which integrates the recirculation-blend tanks with the filter pods in a stacked, more compact arrangement. This control building is proposed to be located east of the southeast corner of the proposed emergency services center and adjacent to an AX-MAX unit.

Additionally, Area 6 has been investigated and found to have very favorable conditions for subsurface leachfields, which would be able to accommodate wastewater flow during the wet season at Lawson's Landing.

Under the Revised Plan, the previously proposed "Middle" and "Lower" leachfields in Area 6 previously unresolved ESHA have been dropped from the consideration, and the proposed facilities changed to the following:

- **Winter Area 6 Leachfield (50%).** A smaller capacity winter leachfield will be developed in the traffic/parking area in the northeast section of Area 6, a legally developed area, sized to provide approximately half of the winter wastewater dispersal capacity.
- **Winter Scale House Dripfield (50%).** The other half of the winter dispersal capacity will be provided by development of a subsurface drip dispersal field in the Scale House area.
- **Summer Scale House Spray Irrigation (100%).** Plans for summer wastewater dispersal will remain as previously proposed, consisting of a 6-acre spray irrigation field in a portion of the Scale House pasture area.

The wastewater system is described in greater detail in the, Revised Wastewater Facilities Plan for Lawson's Landing, and included in the "Required Attachments" section of this application. (See: 22. *IV-8.Revised Wastewater Facilities Plan*, in "Required Attachments".)

**Phasing of the wastewater system will be as follows:**

**Phase 1:** Until the new wastewater system can be constructed, 7 employee trailer homes will rely on existing leach lines that have been tested in accordance with Marin County Environmental Health Services procedures, and found to be performing adequately. The 7 employee trailer homes have been moved to the northwest part of Area 2, which will be the long-term employee trailer home area. A Septic Tank Effluent Pump (STEP) wastewater system tank was installed to serve these employee trailer homes. Existing, pre-tested leach lines were connected to this tank and have been serving the employee homes during this first phase. The tank will ultimately tie into, and be part of, the permitted STEP wastewater system once it is approved and built. A second new tank will be installed following grading so that they can remain in the same location after the full wastewater system has been installed. The tanks will be 2,000 gallons in capacity and about 5 feet deep, 6 feet wide, and 9 feet long. They would be traffic-rated, so they can be installed beneath parking and other areas in which vehicles travel.

**Phase 2:** When the new STEP system is completed with a main effluent line from Area 2 to the treatment plant in Area 6, the STEP tank serving the employee trailer homes will be tied into the rest of the STEP system. This will hopefully be in operation by fall of 2021 or Spring of 2022.

**Phase 3:** The wastewater lines are completed to the upper pasture scale house area and spray irrigation is hopefully available during the peak-use, late spring and summer dry season period of 2022.

## **B. Relationship to Traffic Management Plan**

Special Condition 12, Traffic Management Plan, of the Lawson's Landing Coastal Development Permit indicates: "The use of on-site facilities by visitors to avoid off-site trips is encouraged" and that the Plan shall provide, "Traffic reduction incentives for campsite users, including non-peak day arrivals/departures, multiple-occupant versus single-occupant vehicles, in-camp trip reductions, and shuttle."

The section of Lawson's Landing's Interim Camp Management and Operation plan, which was initially approved May 25, 2012 by the California Coastal Commission (CCC), addresses CDP Condition 12, Traffic Management Plan on page 6 as follows: "In general, in order to hopefully replace 1) the year round revenue from trailer space rental that will be completely lost, and 2) peak season revenue from camp lots that are being lost, Lawson's Landing hopes to bring groups to stay at Lawson's Landing for family, non profit, and business gatherings on a year round basis." Providing for group stays may be essential to offsetting revenue loss and preserving affordable coastal access in an economically viable and self-sustaining (i.e., non-taxpayer subsidized) manner at Lawson's Landing.

A small office to support processing guests and traffic management in accordance with Condition 12 would be on the west side of the Command/Care and Emergency Services building.

### **1. Area 6 as traffic management and transportation hub**

a) Area 6 is the logical location to receive and process guests, and provide transportation alternatives especially for groups arriving in multiple-occupant shuttles and vans. After being processed in Area 6, this will be the location where guests can then be offered in-camp shuttles, bicycles, and other alternatives as opposed to single-occupant vehicles.

Lawson's Landing's approved Interim Camp Management and Operation Plan further indicates: "Shuttles clearly will be helpful in reducing traffic, including by keeping visitors inside Lawson's Landing. Shuttles, in contrast to low-occupancy vehicles, can also greatly lower overall environmental impact by bringing groups of guests out to Lawson's Landing."

b) Second, in being near the entrance gate, Area 6 is a suitable location for vehicles to move from the entrance gate and provide relief if backups and idling of vehicles ever occurs. Area 6 would also be used as a secondary camper entry and processing location on peak camping or visitors days.

c) As above, Area 6 is an appropriate storage location for rented bikes and electric carts and vehicles, which can be used as low-impact transport by those who arrive in multiple-occupancy vehicles.

d) Electric vehicle charging stations with solar collectors to power them will also be part of an environmentally responsible design. Electric carts are currently used at Lawson's Landing for maintenance purposes and their use will be expanded to provide a zero emission option for guests staying at Lawson's Landing, whether they arrive in shuttle or large RV. Although not yet commercially available, an electric shuttle or van for on-site transportation would hopefully be available in the future.

## **2. Areas 6 and 8 to be used as construction staging areas for equipment and materials**

During the construction phases of the project, Areas 6 and 8 are logical areas for location for construction staging, including temporary storage of construction materials and equipment. In particular, periodic large deliveries to this area and adequate storage area would avoid the need for frequent trips in and out of Lawson's Landing for construction materials and equipment by contractors working at Lawson's Landing.

### **C. Relationship to Hazard Response Plan**

#### **1. Hazard response, emergency services center**

The CCC-approved Lawson's Landing Hazard Response Plan, specifies locating a "Command Center/Satellite Station at Area 6. The Marin Office of Emergency Services has indicated strong support for a Command Center at Area 6 for a number of reasons including: 1) it is above the high water mark of the highest anticipated tsunamis (around 20 feet), 2) it is relatively close to Area 4, which is the largest camping area, and 3) it is also close to the Dillon Beach neighborhoods nearby on Cliff and Marine View, which will be separated from the rest of Dillon Beach by the low-elevation and tsunami-vulnerable area near the Dillon Beach paid entrance area, which extends up the valley of Dillon Creek. In fact, all of Dillon Beach is relatively close to Area 6 and will thus make Area 6 the appropriate coordination location between the populations at Lawson's Landing and Dillon Beach at any time"[...] "The nearby Dillon Beach neighbors, as well as potentially other Dillon Beach residents and visitors along with Lawson's Landing visitors, may have to rely on the resources available at Lawson's Landing Area 6, including electricity generator and charging station, medical, water, and food supplies, sanitation services, and shelter."

The Emergency Services Command Center is proposed to be an area less than 1,500 square feet. It could include a small area to facilitate meetings and food preparation. A small office would be on the west side of the Emergency Services building and will be used as Command/Care facility in the event of an emergency.

Storage of emergency supplies will be at the Emergency Services Storage building, which is the logical place to store materials such as first aid and food supplies, foldable cots, and other essential emergency needs. Such storage of emergency supplies is a key part of the hazard preparedness part of any hazard response plan.

Much of the year, during processing or while waiting for a shuttle, it will be necessary for guests to come inside and get out of the weather. The space of the Command/Care and Emergency Services could be flexible and used for a guest processing and waiting area as well as for orientation and other meetings.

#### **2. Storage location Emergency equipment, hazardous materials and boat repair**

Coastal Development Permit Condition 15, Hazard Response Plan requires: "A(2) Measures to eliminate or minimize the introduction of hazardous materials, toxic chemicals and floating debris into the groundwater and nearby surface waters." Consistent with this, it is a priority to keep most hazardous materials away from the waterfront. Area 6, being above the high water mark of the highest anticipated tsunamis, is hence an appropriate location for storage of hazardous materials as well as other materials, which could become floating debris in the event of a tsunami.

The fuel bunker has already been moved from the more environmentally vulnerable shoreline area of Area 2 to its new location in Area 6 in accordance with a permit by Marin County. A copy of the Marin County Certified Unified Program Agency, Hazardous Materials and Hazardous Wastes Regulatory Program Permit has previously been submitted as item 23.

Moving of hazardous materials away from the waterfront is consistent with the Lawson's Landing Marin

County Master Plan for Area 6 as well as with the Lawson’s Landing Coastal Development Permit Condition 15.

The Emergency Storage building would be an appropriate location for storage of equipment needed to support the recreational operations at Lawson’s Landing West of the storage area would appropriately serve as a location for Command/Care and Emergency Services space.

Buildings in Area 6 would have solar panels mounted on them as much as feasible. This renewable, non-Green House Gas (GHG) producing source of energy is consistent with overall environmentally sensitive design at Lawson’s Landing.

The Existing Truck Shed footprint has been in use as a permitted-truck parking, storage and turn-around area since shortly after a permit was issued to Lawson’s Landing for their sand quarry and “facilities related thereto” in 1971. It was in use prior to that as parking and storage area inside their fenced in yard. Its proposed use going forward is simply for an emergency vehicle road.

### **3. Integration with CDP Conditions Plan Requirements and Locations**

Reuse of previously developed area in Area 6 is necessarily integrated with both Lawson’s Landing’s Traffic Management and Hazard Response Plans. This reuse of Area 6 also facilitates affordable coastal access, particularly for groups arriving in shuttles with a relatively low carbon footprint. These factors, along with evidence of prior permitted development, makes an amendment to reuse previously developed Area 6 reasonable.

## **D. Appropriate Location for Management and Administrative Facilities**

### **1. Entry Gate**

The entry gate for now would remain in its present location. The entry gate building may be moved a short distance in the future to accommodate minor entry improvements such as a stacking lane for RVs to avoid congestion at the entry gate.

### **2. Small Office**

Area 6 is also the appropriate location for management of much of the Lawson’s Landing’s operations. Recreational experience is key to the waterfront area, so the limited space in Area 2 is most appropriate for recreational purposes. In contrast, back-of-the-house operations are more appropriate in Area 6. This small office would be on the west side of the Command/Care and Emergency Services building.

Much of Area 6, near the Existing Truck Shed and Maintenance Shed, has Cypress trees that screen this area from the south and west. These long established trees will be maintained.

## **E. Free Public Access Parking**

CDP Condition 22 specifies: “No fewer than five (5) free public parking spaces shall be provided, reserved, and maintained in an open and useable condition for free public use in or adjacent to Area 6 outside the entry gate on the property. Use of the free parking spaces and coastal and campground access conveyed therein by members of the public shall be on a first-come, first-served basis, and shall be for day use only (no after dark or overnight use), with appropriate signage that alerts the public of the parking.”

An appropriate location proposed for these public access parking spaces is just outside the entry gate on the west side of the road. This area has been used informally for parking since the road was created and they will now be assigned specifically for free public parking.

### **Recreational Visitor Serving Support Services difference between MP and CDP**

#### **Store**

While the MP envisioned a store in an Area 6 Landing Center of up to 15,000 square ft., environmentally sensitive habitat area (ESHA) limitations do not provide room for more than essential emergency services and emergency storage building space.

However, the 2011 CDP Traffic Management Plan Condition 12.A.1 specified:

“The use of on-site facilities by visitors to avoid off-site trips is encouraged, ...” For that and other basic visitor serving needs, the existing store will remain in the Boat House.

Boat engine sales, boat repair, and fuel storage have been reduced in scale and largely moved to Area 6 where they will mostly be conducted outside. A smaller fuel bunker is proposed as part of the CCC approved CDP Amendment for Area 6. This is found in the northeast corner of Area 6 as seen in CSW/ST2 Sheet C5.5. A

### **Adaptive Management Plan and CDP Protection, Restoration, and Enhancement Plan (PREP)**

Lawson’s Landing’s 2011 CDP Condition 4 required a Sensitive Resource Wetlands-Dune Complex Protection, Restoration, and Enhancement Plan (PREP). The very detailed and extensive PREP was developed over a 6 year period with the recommendations of a CCC Staff approved independent Scientific Review Panel (SRP). The SRP was not a requirement of the CDP, because as indicated in Condition 4.A.4.h, Lawson’s Landing did not propose major habitat alteration such as an open-water riparian corridor, (which had been proposed by one consultant).

However, the Lawson family agreed to the SRP as requested by CCC Staff and a local environmental group. CCC Staff acknowledged that CDP deadlines would not be met due to SRP process. The PREP was approved by CCC Staff in 2018. The PREP process was the number one reason that final resolution of Lawson’s CDP Amendment did not occur until October of 2020. The PREP was in conformance with and exceeded the Adaptive Management Plan specified in the Marin County Master Plan.

#### **From CDP Condition 4. Sensitive Resource Protection Restoration and Enhancement Plan.**

The approved Resource Protection, Restoration and Enhancement Plan was consistent with the Monk and Associates, Inc. Exhibit C. Resource Protection, Restoration and Enhancement Plan dated June 3, 2011 (exhibit 3 of this Staff Report), except that it was modified and provide for, at a minimum, the following:

1. Consistent with the applicant’s proposed project, as modified by the conditions of this permit, permanent protection through legal instruments reviewed and approved by the Executive Director of the approximate 465-acre wetland-dune system at Lawson’s Landing as shown generally on Monk and Associates, Inc. Exhibit C. Resource Protection, Restoration and Enhancement Plan dated June 3, 2011 as the “proposed conservation easement area” (exhibit 3 of this Staff Report), comprising APNs 100-100-48 and 100-100-59.

2. New development as defined in PRC 30106 will be prohibited in the easement area as shown on the Monk and Associates, Inc. Resource Protection, Restoration and Enhancement Plan dated June 3, 2011 (exhibit 3 of this Staff Report) except for the following:

- a. Restoration and Enhancement activities proposed in the PREP submitted to and approved by the Executive Director as authorized by this condition and consistent with the other terms and conditions of this permit.
- b. Resource-dependent development or development allowed pursuant to PRC 30233 if approved through an amendment to this coastal development permit.
- c. Grazing authorized pursuant to the grazing management plan for the purposes of habitat restoration.

3. Removal of the following development and restoration of the previously developed areas to functioning wetland/upland/dune habitat as relevant, consistent with the approved PREP:

- a. Connecting roads inland of Areas 1-3 as shown on Monk and Associates, Inc. Resource Protection, Restoration and Enhancement Plan dated June 3, 2011, "Restoration Area B" (exhibit 3 of this Staff Report). All fill and surfacing materials, and any culverts or materials bridging existing ditches shall be removed. This area shall be restored to wetland functions and values compatible with the surrounding wetland environment, pursuant to Section 4 below.
- b. Graded area of Area 1 as shown on Monk and Associates, Inc. Resource Protection, Restoration and Enhancement Plan dated June 3, 2011, "Restoration Area A" and Adobe Associates Sheet 17, dated June 2011 (exhibit 3 of this Staff Report). The entire graded land area underneath proposed Restoration Area A, the proposed water quality infiltration basin, and the proposed access road and parking area just above RV sites 25 – 30, as shown on Sheet 17, shall be restored to dune habitat vegetated with central dune scrub species.
- c. Development located in the CRLF corridor connecting the breeding pond next to Area 5 and the entrance, with the breeding pond inland of Area 4, as shown in Exhibit 6, Figure 5 and Monk and Associates, Inc. Resource Protection, Restoration and Enhancement Plan dated June 3, 2011 "Restoration Area C," and Adobe Associates Sheet 21, dated June 2011, except for the existing main access road, the well and water tank access road in Area 5, and other necessary utilities; and any development located within the two CRLF corridors between Areas 6, 8, and the pond inland of Area 4, as shown on Exhibit 6, Figure 5 of this Staff Report, unless the Permittee demonstrates that the development is shown to be legally permitted.
- d. Any development in areas previously used for camping but not authorized by the Coastal Commission, including Area 5 and all other areas within the 'existing (prior) limits of camping line on Monk and Associates Sheet 2, dated October 15, 2010, and restricted buffers pursuant to Special Condition 2.

4. Wetlands/Dunes restoration and enhancement plan prepared by a restoration ecologist experienced with these habitat types that includes, at a minimum, the following:

- a. Engineered Plans for "Restoration Area A" consistent with Section 3(b) of this condition; Restoration A shall be modified to include the entire area above RV lots 25 – 30.

b. Engineered Plans for “Restoration Area B” consistent with Section 3(a) of this condition; Restoration Area B shall be modified, such that the area is restored to wetland habitat, not riparian habitat.

c. Engineered Plans for “Restoration Area C” consistent with Section 3(c) of this condition; Restoration Area C shall be modified such that the planting palette shall include native central dune scrub vegetation.

d. Hydrological Assessment, prepared by a hydrologist with experience in wetland restoration, in consultation with a wetlands restoration ecologist, that identifies measures to increase inundation and soil saturation within the Tomales wetlands/dune complex, including removal of existing drainage ditches and prevention of drainage of wetland areas to the ocean;

e. Invasive Species Removal Plan that includes an initial assessment of the type, extent and general location of invasive species within the proposed conservation easement area, measures to prevent the spread of invasive species, including treatment and removal and managed grazing as appropriate, and a monitoring program consistent with section 6 below, to measure Plan success.

f. Planting of native species of local stock appropriate to the restoration area to enhance habitat values, such as butterfly habitat. Non-native and/or invasive plant species shall be prohibited. No plant species listed as problematic and/or invasive by the California Native Plant Society, the California Invasive Plant Council, or as may be so identified from time to time by the State of California, and no plant species listed as a ‘noxious weed’ by the State of California or the U.S. Federal Government shall be planted or allowed to naturalize or persist in the restoration and enhancement area.

g. Removal of the perimeter road around Area 3 and restoration of the habitat to its pre-disturbed condition, as generally shown on Exhibit 6, Figure 25.

h. Other measures, as appropriate, to enhance habitat for CRLF and snowy plover. If major alterations to habitat are included, such as the proposed open- water riparian corridor in the southern dune slack wetland, a scientific review panel made of up regional experts, including academics and consulting practitioners, shall be convened to assess the plan and make technical recommendations. Those recommendations shall be included in the Restoration and Enhancement Plan.

i. The plans shall be prepared by a certified engineer and shall be prepared using a formal metes and bounds legal description and corresponding graphic depiction of all property subject to this permit, as well as all buffer, development, restoration, enhancement and non-developable areas of the property subject to this condition.

5. Grazing Management Plan that identifies areas within the restoration area where grazing will be prohibited and where grazing may be allowed for purposes of habitat restoration, maintenance, and enhancement. The plan shall be prepared by or in consultation with a restoration ecologist familiar with wetlands and native grasses.

6. The goal of the PREP shall be to enhance and restore the Tomales Wetlands/Dune complex to a self-sustaining natural habitat state adequately buffered from adjacent development. The PREP shall be prepared by a restoration ecologist, and will take into account the specific conditions of the site (including soil, exposure, water flows, temperature, moisture, wind, etc.), as well as restoration and enhancement goals. At a minimum, the plan will provide for the following:

- a. A baseline assessment, including photographs, of the current physical and ecological condition of the restoration and enhancement area.
- b. A description of the goals and measurable success criteria of the plan, including, at a minimum, the requirement that success be determined after a period of at least three years wherein the site has been subject to no remediation or maintenance activities other than weeding, and that this condition be maintained in perpetuity to the maximum extent feasible.
- c. Monitoring and maintenance provisions including a schedule of the proposed monitoring and maintenance activities to ensure that success criteria are achieved.
- d. Provision for submission of bi-annual reports of monitoring results to the Executive Director, beginning the first year after completion of the restoration effort and concluding once success criteria have been achieved. Each report will document the condition of the site area with photographs taken from the same fixed points in the same directions, shall describe the progress towards reaching the success criteria of the plan, and shall make recommendations, if any, on changes necessary to achieve success.

7. Adherence to the protection measures for snowy plovers identified by the USFWS.

B. The Permittee shall undertake development in accordance with the approved PREP. Any proposed changes to the approved final plans shall be reported to the Executive Director. No changes to the approved final plans shall occur without a Commission amendment to this coastal development permit unless the Executive Director determines that no amendment is required. If any of the success criteria identified in the Plan are not achieved, the Permittee shall submit a Coastal Development Permit Amendment proposing alternative measures to achieve the success criteria identified in the Plan.

PREP in conformance with Adaptive Management Plan

The Master Plan required an Adaptive Management Plan, which would address balancing low cost recreational visitor uses at Lawson's Landing with on-going agricultural use and environmental protection and restoration. Consistency between the Adaptive Management Plan and Lawson's Landing's CDP Sensitive Resource Protection Restoration and Enhancement Plan is found on page 12 of the attached Comparison Table CDP & MP Lawson's Landing.

A Dune Trail Plan specifying management of pedestrian trails was approved the CCC in compliance with Lawson's Landing's CDP. (See attached approved Dune Trail map Sheet 1). Additionally there is also a pedestrian trail planned for the southeast end of Area 1 See CSW/ST2 Sheet C3.0 keynote item 10.

**Agricultural Use**

Portions of property (approximately 450 acres) have been used for agricultural use since the 1920's. The MP and CDP provided approval of continued use of this area for agricultural purposes. The agricultural activities, mainly cattle grazing, would be retained within the areas specified as "outside the limits of camping."

A Grazing Management Plan was developed by Lisa Bush, Certified Rangeland Manager, in compliance with Lawson's Landing's MP and CDP.

Aspects of balancing agricultural use, camping & recreational use and biological resources management at Lawson's Landing were addressed in the CDP Sensitive Resource Protection Restoration and Enhancement Plan (PREP). The PREP is consistent with or exceeds the Adaptive Management Plan.

### **Water Facilities**

It is clear from all of geology and ground water studies performed in the area of the Lawson's Landing property that there is an abundance of fresh water on the property. Although the proposed Master Plan calls for expansion of the water system to service the some existing and proposed new camping areas and the Lawson's Landing Center, there will be a reduction in visitors from anticipated in the Master Plan that would use the water supply. As noted in the project EIR, substantial water resources exist on the property and it is feasible for the property owners to consider making an improvement of the water collection and storage facilities beyond site-specific demands.

Finally, water supply improvements including two new water tanks would be constructed near existing tanks and additional storage for fire protection would be available. New hydrant locations have yet to be identified but will generally be near the clustered use areas as seen in See CSW/ST2 Sheet C3.1.