

1 Code § 30000 et seq.) (hereinafter “the Coastal Act”) and the California Environmental Quality Act
2 (California Public Resources Code § 21000 et seq.) (hereinafter “CEQA”).

3 2. Respondent improperly approved the LUPA. The LUPA, as approved, would violate, without
4 limitation, Sections 30006, 30241, 30242, 30250, and 30251 of the California Coastal Act and CEQA, by
5 opening the majority of non-federal coastal zone land to potentially over one million square feet of new
6 residential and commercial development.

7 3. Petitioner petitions this Court for a writ of mandate under Code of Civil Procedure section 1094.5,
8 or such other writ as may be appropriate, directing the Commission to vacate and set aside its approval of
9 the LUPA; and 2. Provide the required environmental analysis mandated by the Coastal Act and CEQA.

10 **PARTIES**

11 4. “Petitioner” is national nonprofit organization of approximately 625,000 members, roughly
12 147,000 of whom live in California. The Sierra Club's is dedicated to exploring, enjoying and protecting
13 the wild places of the earth; to practicing and promoting the responsible use of the earth's ecosystems and
14 resources; to educating and encouraging humanity to protect and restore the quality of the natural and
15 human environment; and to using all lawful means to carry out these objectives. The Sierra Club's
16 concerns encompass the acts engaged in by respondents herein. The Sierra Club's particular interest in this
17 case stemmed from the allegations set forth herein below. Petitioner, by and through the written and
18 verbal comments of its membership, has satisfied the requirements of Public Resources Code § 30801 and
19 is an “aggrieved person” under said section, having appeared before and submitted multiple letters to
20 Respondent Commission regarding the land use plan amendment (LUPA) that is the subject matter of this
21 Petition. Petitioner has, from and after 2008, including in direct regard to the LUPA, submitted to
22 Respondents, multiple written communications opposing approval of the LUPA. In so doing, Petitioner
23 has exhausted its administrative remedies.

24 5. Respondent CALIFORNIA COASTAL COMMISSION (hereinafter “Respondent CCC” or
25 “Commission”) is a state agency duly organized under the laws of the State of California and is the agency
26 that approved the LUPA.

27 6. Respondent COUNTY OF MARIN (hereinafter “COM”) is a political subdivision organized and
28 existing under the constitution and laws of the State of California.

1 7. Petitioner is ignorant of the true names and capacities of respondents sued herein as DOES 1
2 through 20, inclusive, and therefore sue these respondents by these fictitious names. Petitioner will amend
3 this petition to allege their true names and capacities when ascertained.

4 8. At all times mentioned in the complaint, each of the respondents was acting as the agent and
5 employee and working within the scope and employment of each of the other respondents.

6 **JURISDICTION AND VENUE**

7 9. Jurisdiction of this Court is invoked pursuant to California Public Resources Code 30801, 21168,
8 and/or 21168.5, and California Code of Civil Procedure § 1094.5. Venue is proper because the affected
9 coastal zone land is located in Marin County.

10 **ALLEGATIONS COMMON TO ALL CAUSES OF ACTION**

11 10. Prior to and at the May 15, 2014, California Coastal Commission hearing, Respondent
12 Commission approved the LUPA. Said LUPA was submitted to CCC for approval, and, as approved,
13 contemplates local implementation and administration by COM. (Public Resources Code Sec. 30153, et
14 seq). Attached hereto as Exhibit A, and incorporated herein by reference, is respondent's CCC's Notice of
15 Decision, ("NOD"), bearing the date June 4, 2014. The NOD was filed with the Office of the Secretary of
16 the Resources Agency of California on June 10, 2014. (Exhibit A, final page). The NOD summarizes the
17 actions of Respondents, which petitioner alleges violate the Coastal Act and CEQA, as more particularly
18 described herein.

19 11. Petitioner has no plain, speedy, and adequate remedy in the ordinary course of law unless this
20 Court grants the requested Writ of Mandate to require Respondent Commission to set aside and vacate its
21 approval of the LUPA.

22 12. Under the existing Certified LCP and the LUP certified in 1981, one residential dwelling unit on a
23 parcel in the Coastal-Agriculture Production Zone (C-APZ) is allowed as a "Permitted Use." The
24 determination of permitted use is appealable to the Commission. The current LUP defines a "parcel" as
25 "all contiguous assessor's parcels under common ownership". As applied since 1981, this definition has
26 resulted in minimal residential development on the agricultural lands in the (C-APZ), since adoption of the
27 original LUP. A result of this permitted use process is that maximum agricultural land remains in
28

1 production. A further result is that housing density, and the attendant negative land-use impacts are
2 regulated, and subject to public scrutiny and comment.

3
4 13. Protection of the C-APZ zoning district from 60-acre zoning density build-out is repeated
5 throughout the Marin County Certified LCP LUP Unit II (1981). Protection against development at a
6 density of one residence per 60-acre build-out follows, preventing conversion of agriculture lands in the
7 coastal zone to residential subdivision which would violate, without limitation, Coastal Act Sections
8 30241, 30242 and 30250.

9 14. Under the rubric of expansion of agricultural housing, farmworker housing and intergenerational
10 housing, the LUPA contains policy changes, which would implement such housing to greatly increase
11 density in the coastal zone. For example, the amendment redefines "parcel" as "legal lot of record." The
12 impact of this re-definition is to expose the coastal zone to over 1,000,000 ft.² of new residential
13 development on agricultural lands, insofar as conversion from "parcel" to "legal lot of record" can be
14 accomplished administratively, without scrutiny or regulation. "Agriculture," the principal permitted use
15 in the coastal zone, is redefined to allow substantial increased commercial residential housing.

16 **FIRST CAUSE OF ACTION- VIOLATIONS OF THE CALIFORNIA COASTAL ACT**
17 **(California Public Resources Code § 30000 et seq.)**

18 15. Petitioner refers and by such reference incorporates herein as if fully set forth, each and every
19 allegation set forth above.

20 16. In approving the LUPA, Respondent Commission violated substantive provisions of the California
21 Coastal Act. Such violations include, without limitation, California Public Resources Code § 30001,
22 30006, 30241, 30242, 30250 and 30251.

23 17. The values to be protected pursuant to the provisions of, without limitation, sections 30001 et seq.
24 recognize the state's natural and scenic resources as being of paramount concern in the interests of public
25 safety, health, and welfare including protection of private property, wildlife, marine fisheries and other
26 ocean resources and the natural environment. Carefully planned and developed land use policies are
27 mandated. Respondents have proceeded in the absence of any evidence that said values and policies have
28 been addressed. Violations of the Coastal Act include the following:

1 a. The proposed amendment to the LUP fails to address, in any meaningful manner,
2 environmentally sensitive habitat areas or areas adjacent to such areas (Public Resources Code Section
3 30240).

4 b. Maintenance of productive agricultural land has not been properly addressed. (Public
5 Resources Code Section 30241).

6 c. Scenic and visual qualities, required to be considered and protected pursuant to the provisions
7 of Public Resources Code Section 30251, have been ignored.

8 d. The implementation provisions of Public Resources Code section 30525, mandating identity of
9 sensitive resource values in the coastal zone, and advice to the appropriate local government (in this
10 instance respondent County of Marin), of particular considerations requiring evaluation during the
11 preparation of a local coastal program, and that such work maximize the opportunity for the public to
12 consider information contemplated under section 30525 have not been addressed in adoption of the
13 Amendment.

14 For the reasons set forth herein, Petitioner prays relief as hereinafter set forth.

15
16 **SECOND CAUSE OF ACTION-**
17 **VIOLATIONS OF THE CALIFORNIA ENVIRONMENTAL QUALITY ACT ("CEQA")**
18 **(California Public Resources Code § 21000 et seq.)**

19 18. Petitioner refers and by such reference incorporates herein as if fully set forth, each and every
20 allegation set forth above.

21 19. Respondents are required, in approving an LCP submittal, or, as alleged herein, in this matter an
22 LUP amendment submittal, to find that the approval of the proposed amendment conforms with CEQA
23 provisions, including the requirement in CEQA section 21080.5 (d) (2)(A) that the amended LUP will not
24 be approved or adopted as proposed if there are any feasible alternative or feasible mitigation measures
25 available which would substantially lessen the any significant adverse impact which the activity may have
26 on the environment. 14 C.C.R. Sec. 13540 (f) and 13555 (b). An example of Respondents' purported
27 means of complying with the above stated requirements is to have stated, in its staff report supporting
28 adoption of the amendment: "In this particular case, all of the proposed amendments are being approved as
submitted. Thus, there are no feasible alternatives or feasible mitigation measures available which would

1 substantially lessen any significant adverse impact on the environment." This reasoning fails to address
2 the requirement to identify alternatives, and/or mitigation measures, including the alternative of taking no
3 action, as required by the Coastal Act and CEQA. Such circular reasoning not only fails to satisfy the
4 requirements of CEQA itself, but is recognized in California case law as failing to meet the evidentiary
5 and findings standards necessary to achieve CEQA compliance. *Topanga Ass'n for a Scenic Community v.*
6 *County of Los Angeles* (1974) 11 Cal. 3d 506, 515- 517.

7 20. In approving the LUPA, Respondent Commission violated, without limitation, California Public
8 Resources Code § 21080.5(d)(2)(A) and (d)(3)(A), because the Commission failed to analyze any feasible
9 alternatives and mitigation measures that would substantially lessen the significant environmental effects
10 that the potential consequential development permitted by the LUPA may have on the environment.
11 Based on the above, Respondents have abused their discretion, proceeded in excess of or without
12 jurisdiction and have violated the Coastal Act and CEQA such that, unless granted relief hereunder,
13 Petitioner has no adequate remedy.

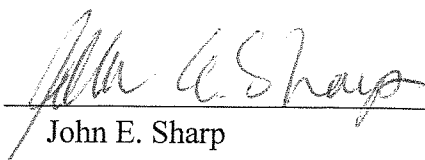
14
15 **PRAYER FOR RELIEF**

16 WHEREFORE, Petitioner pray judgment against Respondents as follows:

- 17 1. For a peremptory Writ of Mandate to require Respondent Commission to set aside and
18 vacate its approval of the LUPA;
 - 19 2. For provisional relief, including, without limitation, a stay of the effect of the LUPA
20 approval;
 - 21 3. For reasonable attorney's fees under California Code of Civil Procedure § 1021.5;
 - 22 4. For costs of suit; and
 - 23 5. For other and further relief as the Court may deem proper.
- 24
25

26 Dated: 7/10/14

LAW OFFICES OF JOHN E. SHARP

27
28 By: 
John E. Sharp

CALIFORNIA COASTAL COMMISSION

45 FREMONT, SUITE 2000
SAN FRANCISCO, CA 94105-2219
VOICE AND TDD (415) 904-5200
FAX (415) 904-5400

**NOTICE OF DECISION**

TO: Office of the Secretary for Natural Resources
1416 Ninth Street, Ste 1311
Sacramento, CA 95814

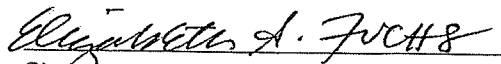
FROM: California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, CA 94105-2219

SUBJECT: Filing Notice of Decision in compliance with Section 21080.5 of the Public Resources Code

DATE: June 4, 2014

The projects and plans on the attached list have been approved by the California Coastal Commission at its meeting of May 14-16, 2014. Some of the projects or plans have been approved subject to conditions or suggested modifications which require mitigation measures or alternatives to the projects to lessen or avoid significant effects on the environment.

1. The projects or plans as approved will not have significant effects on the environment.
2. Environmental analysis documents were prepared for these projects pursuant to Sections 21080.5 of CEQA and Section 15252 of Title 14 of the Administrative Code.
3. The records of projects or plan approvals may be examined at the respective district offices of the Coastal Commission as set out on the attached list.
4. Mitigation measures were in some cases made conditions of the approvals of the projects.


Signature

Elizabeth A. Fuchs
Coastal Program Manager

Received for Filing:

Date: _____

By: _____

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Exhibit A to Petition

MORE INFORMATION. At the end of the agenda description the author's initials and a code indicating his/her headquarters office are identified (E=Eureka SF=San Francisco SC=Santa Cruz V=Ventura LB=Long Beach SD=San Diego). For more information about this agenda, contact one of the following staff members:

E (Del Norte, Humboldt, & Mendocino) Bob Merrill (707) 826-8950,
SF (Sonoma, Marin, San Francisco & San Mateo Counties) Nancy Cave
(415) 904-5260,

SC (Santa Cruz, Monterey & San Luis Obispo Counties) Madeline
Cavalieri (831) 427-4863,

V (Santa Barbara & Ventura Counties, Malibu & Santa Monica
Mountains) Steve Hudson (805) 585-1800,

LB (Los Angeles & Orange Counties) Teresa Henry (562) 590-5071,

SD (San Diego County) Sherilyn Sarb (619) 767-2370,
A Telecommunication Device for the Deaf (TDD) is available at (415)
904-5200.

WEDNESDAY, MAY 14, 2014

SOUTH COAST DISTRICT (LOS ANGELES COUNTY)

ADMINISTRATIVE CALENDAR

Application No. 5-14-0552 (City of Santa Monica Road Improvement Project)

Application of City of Santa Monica to Improve Colorado Ave. Esplanade to include: restructuring of Colorado Ave. from Ocean Ave. to 4th St.; construction of 2-way bike-lane and wider pedestrian walkway; realigning of Main St. to directly lead to 2nd St.; and widening of pedestrian sidewalk on Ocean Ave. Results will include: 2 westbound lanes along Colorado Ave. west of 4th St. (creating a one way street), new overhead street lights and new landscaping, relocation of water main on Ocean Ave. and relocation of treated water line located on Colorado Ave., from Ocean Ave to 4th Street, Santa Monica, Los Angeles County. (AD-LB)

CONSENT CALENDAR

Application No. 5-14-0247 (World Series of Beach Volleyball, LLC and City of Long Beach, Long Beach) Application of World Series of Beach Volleyball, LLC & City of Long Beach to construct 3,200-seat stadium and erection of fencing on Alamitos Beach for professional and amateur volleyball tournament to be held July 22-27, 2014, on public beach near 386 Shoreline Dr., Long Beach, Los Angeles County. (CP/RAB-LB)

SOUTH COAST DISTRICT (ORANGE COUNTY)

ADMINISTRATIVE CALENDAR

Application No. 5-13-0667 (Sabo, Newport Beach) Application of Elias Sabo to demolish 872 sq.ft. double-U shaped floating dock, and gangway, pier platform (total 1,044 sq. feet) and associated piles and construct new 872 sq.ft. double-U shaped floating dock, 24 ft. x 3 ft. gangway, 4 ft. x 4 ft. pier adjacent to bulkhead and 10 ft. x 10 ft. pier platform (total 1,060 sq. feet) supported by new piles, at 1220 West Bay, Newport Beach, Orange County. (LR-LB)

Application No. 5-14-0186 (Vogler, Newport Beach) Application of Emily Vogler to remove and replace 440 sq.ft. patio deck and 175 sq.ft. cantilever deck, over Promontory Bay fronting residence at 434 Harbor Island Dr., Newport Beach, Orange County. (ZR-LB)

Application No. 5-14-0529 (Cimmarusti, Huntington Beach) Application of Jerry and Valerie Cimmarusti to remodel 2,674 sq.ft., 2-story, 3-unit residential structure with rooftop deck, including interior remodel, new 1,478 sq.ft. third-floor addition and new 897 sq.ft. roof deck resulting in new 4,152 sq.ft., 35 ft-high, 3-story, 3-unit residential structure on inland lot in Sunset Beach, Huntington Beach, Orange County. (LR-LB)

Application No. 5-14-0198 (Reenders, San Clemente) Application of Jeff Reenders to remodel 1,922 sq.ft., single-story family home with attached garage, including interior remodel, new second-floor addition, ground floor living space and garage additions resulting in 2,768 sq.ft. (including garage), 22'.6" high, 2-story single-family home on coastal canyon lot in San Clemente, Orange County. (LR-LB)

CONSENT CALENDAR

Application No. 5-14-0197 (Orange County Public Works, Orange Co.) Application of Orange County DPW to install floating debris boom and net system across Huntington Beach Channel and floating debris boom and litter trap system across Talbert Channel at Huntington Beach Channel, approx. 800 feet upstream of Magnolia Street Bridge and Talbert Channel, approx. 250 feet downstream of Banning Avenue Bridge, Orange County. (SV-LB)

Application No. 5-14-0283 (City of Huntington Beach Bridge Maintenance Project) Application of City of Huntington Beach for bridge maintenance and repairs including replacing concrete barriers and chain link railing; removal and patching of unsound concrete on bridge pier walls, removal and replacement of asphalt concrete on bridge deck; and restoration of rock revetment on both channel banks, at Magnolia Street Bridge No. 55C-0388, Huntington Beach, Orange County. (SV-LB)

Application No. 5-14-0425 (Newport Beach Partnership, LLC, Newport Beach) Application of Newport Beach Partnership, LLC to demolish 2-story, single-family, beachfront home with attached 2-car garage and construct 2-story, 28-ft. high, single-family home with 2,562 sq.ft. of living space; attached 465 sq.ft., 2-car garage; and 519 sq.ft. roof deck, at 1115 E. Balboa Blvd., Newport Beach, Orange County. (MS-LB)

SAN DIEGO COAST DISTRICT

DEPUTY DIRECTOR'S REPORT

City of San Diego LCP Amendment No. LCP-6-SAN-14-0309-1 (Appeals of Environmental Determinations). Concurrence with the Executive Director's determination that the request of the City of San Diego to codify noticing requirements and rights of appeal for certain environmental determinations in the certified Land Development Code (IP) is de minimis. (BL-SD)

REGULAR CALENDAR

Application No. 6-13-0437 (Presnell/Graves LLC, Solana Beach) Application of Presnell/Graves LLC to construct 49 ft.-long, 35 ft.-high, colored and textured concrete tiedback seawall and planting/hydroseeding of mid and upper bluff along beach/bluff below 249 Pacific Ave., Solana Beach, San Diego County. (ES-SD)

SOUTH COAST DISTRICT (LOS ANGELES COUNTY)

DEPUTY DIRECTOR'S REPORT

Port Master Plan Amendment PMP-5-PLA-13-0201-5. Port of Los Angeles Port Master Plan Amendment No. 28. Final Commission action on Board of Harbor Commissioners' adoption of Commission's certification of Port Master Plan update combining the original 1980 Port Master Plan and its subsequent amendments into a comprehensive user-friendly long range master planning document that reflects recent land use and planning projects and accommodates forecasted cargo growth; change to the number of planning areas from nine to five; use changes, including consolidating commercial fishing uses into one area and changing a recreational marina to maritime support; three minor landfills (6, 16, and 18 acres); revisions to implementation guidelines and to the methodology for performing risk analyses for hazardous liquid cargo facilities]. (AP-LB)

SOUTH CENTRAL COAST DISTRICT

DEPUTY DIRECTOR'S REPORT

City of Santa Barbara LCP Amendment No. MAJ-1-12 (415 Alan Road). Certification Review. Concurrence with the Executive Director's determination that action by the City of Santa Barbara, acknowledging receipt, acceptance, and agreement with the Commission's certification with suggested modifications is legally adequate. (MA-V)

CONSENT CALENDAR (removed from Regular Calendar)

Application No. 4-12-088 (Los Angeles County Dept. of Public Works, Los Angeles Co.) Application of Los Angeles County DPW to demolish 44,878-sq.ft. of existing buildings and outdoor recreation areas, paved parking lot areas and roadways, onsite vegetation, and various utility systems at existing juvenile detention camp called Camp Kilpatrick, and placement of 14-ft. security fence, at 427 Encinal Canyon Rd., Santa Monica Mountains, Los Angeles County. (DD-V)

Application No. 4-13-1176 (City of Santa Barbara Public Works Dept., Santa Barbara Co.)

Application of City of Santa Barbara DPW to replace structurally deficient Cabrillo Bridge over Mission Creek, improve water flow of Mission Creek, and reconstruct and restore Mission Creek and Lagoon from State Street to Pacific Ocean, Santa Barbara, Santa Barbara County. (DV-V)

Application No. 4-14-0291 (Hill & Coletti, Los Angeles Co.) Application of Gabriel Hill & Trina-Marie Coletti to construct 693 sq.ft., one-story addition to existing 1,275-sq.ft., 2-story single-family home; add new 480 sq.ft. pool, septic system and retaining walls; improve driveway to 15-ft width, with 302 cu.yds. of grading (140 cu.yds. of cut and 162 cu.yds. of fill) at 1944 Corral Canyon Rd., Santa Monica Mountains, Los Angeles County. (DD-V)

Application No. 4-08-091-A1 (Cook, Los Angeles Co.) Application of Jared Cook to amend permit to include after-the-fact approval of propane tank, cistern, and retaining walls, located at 21683 Saddle Peak Rd., Santa Monica Mountains, Los Angeles County. (JB-V)

THURSDAY, MAY 15, 2014

CENTRAL COAST DISTRICT

DEPUTY DIRECTOR'S REPORT

City of Pismo Beach LCP Amendment No. LCP-3-PSB-13-0225-2 (Update to Planning Areas A and B). Certification Review. Concurrence with the Executive Director's determination that the action by the City of Pismo Beach in accepting certification of LCP 3-PSB-13-0225-2 with modifications (altering emergency access provisions and circulation layout) is legally adequate. (AC-SC)

CONSENT CALENDAR (removed from Regular Calendar)

University of California at Santa Cruz SCZ-NOID-0004-14 (UCSC NOID 7 – Marine Mammal Pool Renovation). UCSC's notice pursuant to the certified CLRDP for renovation of the existing marine mammal pools at UCSC's Marine Science Campus at Terrace Point in Santa Cruz. (AK-SC)

Application No. 3-13-0960 (City of Santa Cruz Fireworks Display) Application of City of Santa Cruz for free public fireworks display on October 4, 2014, located on Main Beach adjacent to San Lorenzo River in Santa Cruz, Santa Cruz County. (KG-SC)

NORTH CENTRAL COAST DISTRICT

CONSENT CALENDAR (removed from Regular Calendar)

Montara Water and Sanitary District MWS-NOID-0001-14 (Alta Vista Storage Tank No. 2). Public hearing and action on notice of impending development by MWSD, pursuant to the certified Public Works Plan PWP No. 2-06-006, to construct new 44-ft. tall, 500,000-gal. capacity, pre-stressed concrete, Alta Vista Tank No. 2 on Alta Vista Rd., in Montara, San Mateo County. (RA-SF)

LOCAL COASTAL PROGRAMS (LCPs)

Marin County LCP Amendment No. LCP-2-MAR-13-0224-1 Part A (Marin LUP Update). Public hearing and action on request by Marin County to comprehensively update the LCP's Land Use Plan. (KK-SC)

REGULAR CALENDAR

Appeal No. A-2-MAR-11-025 (Caltrans, Marin Co.) Appeal by Commissioners Stone and Shallenberger of Marin County decision granting permit with conditions to Caltrans for repair of 450-ft. stretch of State Hwy 1 including construction of 230-ft. long retaining wall, installation of metal beam guard rail and cable railing, expansion of roadway width, and reduction in roadway curvature in Stinson Beach, Marin County. (JM-SF)

FRIDAY, MAY 16, 2014

NORTH COAST DISTRICT

CONSENT CALENDAR (removed from Regular Calendar)

Application No. 1-13-001 (Foote & Akselsen, Humboldt Co.) Application of Julie Foote and Alden Akselsen to demolish 1,348 sq.ft. single-family home and construct new 1,430 sq.ft. 2-bedroom single-family home and 2-car garage with rear deck, new septic system, water supply line, and landscaping at 2452 Tower Dr., Eureka, Humboldt County. (ND-A)

Appeal No. A-1-DNC-12-021 (Elk Valley Rancheria, Del Norte Co.) Appeal by Commissioners Stone and Sanchez, and by Friends of Del Norte from decision of County of Del Norte granting coastal grading permit with conditions to Elk Valley Rancheria to reconstruct and improve Humboldt Road from U.S. Hwy 101 to approx. 300 feet south of Roy Ave. by adding multi-use trail, paved shoulders, and roundabout at intersection of Humboldt Rd. and Sand Mine Rd. Project is located 2 miles east of Crescent City, Del Norte County. (MBK-A)

Consistency Certification No. CC-0001-14 (Elk Valley Rancheria, Del Norte Co.) Consistency Certification by Elk Valley Rancheria for portion of project on trust lands to reconstruct and improve Humboldt Road from U.S. Highway 101 to approx. 300 feet south of Roy Ave. by adding multi-use trail, paved shoulders, and roundabout at intersection of Humboldt Rd. and Sand Mine Rd. Project is located 2 miles east of Crescent City, Del Norte County. (MBK-A)

Permit No. 1-09-022-A1 (Mercer-Fraser, Humboldt Co.) Request by Mercer-Fraser to amend permit granted for gravel extraction to authorize one additional year of seasonal gravel extraction in 2014, on Sandy Prairie landform on Lower Eel River at river miles 10-11 (Plant B) and 11-12 (Plant A), near Fortuna, Humboldt County. (KS-A)

Permit No. 1-09-021-A1 (Rock & Dwelley, Humboldt Co.) Request by Leland Rock & Charles Dwelley to amend permit granted for gravel extraction to authorize one additional year of seasonal gravel extraction in 2014, at 0.5 miles south of Alton near Fortuna, Humboldt County. (KS-A)

Permit No. 1-09-006-A1 (Eureka Ready Mix, Humboldt Co.) Request by Eureka Ready Mix to amend permit granted for gravel extraction to authorize one additional year of seasonal gravel extraction in 2014, at Eel River Gravel Bars located west of Fowler Lane (Hauck Ranch), Humboldt County. (KS-A)

Permit No. A-1-MEN-07-028-A2 (Jackson-Grube Family Inc., Mendocino Co.) Request by Jackson-Grube Family, Inc. to amend permit granted for development of 6-unit inn to (1) convert approved garage structure into inn manager's unit and guest cottage used occasionally as visitor accommodations, (2) add additional parking, and (3) enclose north porch of main building and make other improvements to the inn buildings, at 31502 No. Hwy One, 4 miles south of Westport, Mendocino County. (CK-A)

RECEIVED BY
Office of the Secretary

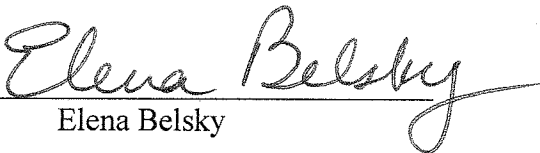
JUN 10 2014

RESOURCES AGENCY OF CALIFORNIA

VERIFICATION

I, Elena Belsky, hereby declare that I am a member of Petitioner, Sierra Club. I have read the foregoing **VERIFIED PETITION FOR ADMINISTRATIVE WRIT OF MANDAMUS** and know the contents thereof. The same is true of my own knowledge, except as to the matters stated upon information and/or belief, and as to those matters I believe it to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 9th day of July, 2014 at San Rafael, California.


Elena Belsky