

FILED

9/01/2026

WHEN FILED MAIL TO:

Marin County Community Development
Agency, Environmental Review Division
3501 Civic Center Drive, #308
San Rafael, Ca 94903

Attn: Don Allee

SHELLY SCOTT
MARIN COUNTY CLERK
By O. Lobato, Deputy
21 - 2026 - 146

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NOTICE OF CEQA EXEMPTION

July 16, 2026

1. **Project Name:** Howard Trust (CLAM) Emergency Coastal Development Permit
2. **Project Location:** 13275 Sir Francis Drake Blvd., Inverness
APN: 112-340-18
3. **Project Summary:** Emergency Coastal Permit (CDP) approval to convert and use existing hotel rooms as income-restricted dwelling units to provide housing for agricultural workers facing imminent displacement due to ranch closures throughout West Marin. No physical changes or improvements are proposed to the existing setbacks, building height, footprint, exterior massing, septic system, site circulation, and onsite parking. The table below provides details of each existing hotel unit.
4. **Public Agency Approving Project:** Marin County Community Development Agency
5. **Project Sponsor:** Tom McCafferty, on behalf of the Community Land Trust Association of West Marin (CLAM) and the property owner Howard Trust Et al
6. **CEQA Exemption Status:** CEQA Guidelines § 15061(b)(3); 15301(h), Class 1; and 15304, Class 4.
7. **Reasons for Exemption:**

The County of Marin has concluded, upon thorough review of the administrative record, that the proposed project qualifies for exemption from the California Environmental Quality Act (CEQA) under Guidelines § 15061(b)(3). This determination is based on the assessment that the project is unlikely to result in any significant environmental impact because no physical changes or improvements are proposed to the existing setbacks, building height, footprint, exterior massing, septic system, site circulation, and onsite parking. The table below provides details of each existing hotel unit.

C-27-05

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The project site comprises 20 lodging units and a detached three-bedroom single-family residence that serves as the manager's unit, for a total of 21 units. Other improvements associated with the hotel use include septic systems, on-site parking spaces, a tennis court, and outdoor patios. The lodging units include both studios and one-bedroom apartments, distributed across five separate buildings. Each unit features a bathroom and a kitchenette, making them self-sustaining. The proposed Emergency CDP would allow the conversion of 20 existing lodging units into 10 affordable housing units, totaling 14 bedrooms. There are no plans for exterior or interior renovations associated with the Emergency CDP. No physical changes or improvements are proposed to the existing setbacks, building height, footprint, exterior massing, septic system, site circulation, and onsite parking. The table below provides details of each existing hotel unit.

The project qualifies for exemption under the CEQA Guidelines, specifically Article 19, § 15301(h), which pertains to Existing Facilities. Class 1 exemption addresses activities that involve the operation, repair, maintenance, permitting, leasing, licensing, or minor alterations of established public or private structures, facilities, mechanical systems, or topographical features, provided that there is negligible or no expansion of existing or previous uses. This exemption also encompasses the maintenance of existing landscaping, native vegetation, and water supply reservoirs. The determination of exemption for this project is based on the following findings:

The proposed project meets the key consideration for Class 1 exemptions, as it proposes no expansion of the existing residential structure. Specifically, no new building or substantial expansion of the existing use is proposed. The primary purpose of this project is to create existing hotel rooms that are occupied for a period of less than 30 days, to tenancies that allow greater than 30 days. This will allow the applicant to provide housing for agricultural workers facing imminent displacement due to ranch closures throughout West Marin.

The project qualifies for exemption under the CEQA Guidelines, specifically Article 19, § 15304(e), Class 4, which consists of "minor temporary use of land having negligible or no permanent effects on the environment", such as allowing tenancies greater than 30 days. The determination of exemption for this project is based on the following findings:

The proposed project does not change any existing land use regulations. Multi-family housing, including deed-restricted affordable housing, is permitted in the C-RCR (Resort and Commercial Recreation) zoning district. The project would allow use of the hotels for a period greater than 30 days without any physical change to the existing structures or land. Therefore, the project is within the scope of the exemption provided under 15304.

The County has considered the potential for significant impacts on the environment resulting from the specified activities and determined that there are no unusual circumstances that would result in significant effects on the environment constituting an exception to Classes 1 & 4 Categorical Exemptions as described in Section 15300.2 (c) of the CEQA Guidelines. The determination of exemption for this project is based on the following findings:

The Emergency CDP request is limited to the change in use and occupancy of existing developed structures from an existing Hotel use to an Affordable Housing use classification. No new residential structures, additions, expansion of existing building footprints, subdivision, lot line adjustment, grading, vegetation removal, drainage modifications, or expansion of the existing septic disposal system are proposed as part of this Emergency CDP request.

Further, the project, as proposed, does not trigger any of the exceptions in State CEQA Guidelines § 15300.2. Neither the project site nor any of the adjacent properties are listed

in the California Register of Historical Resources or in the National Register of Historic Places. There are no designated scenic highways adjacent to the project site and the project site is not located on a hazardous waste site list compiled pursuant to Government Code § 65962.5. Based on available data, there are no sensitive habitats, streams, or wetlands present on the site or within 100 feet of the proposed site improvement. No significant impacts due to unusual circumstances, nor any cumulatively significant impacts (such as traffic), were identified during the review process. Additionally, staff notes there are no mapped environmentally sensitive habitats or sensitive plants or animal species on the subject parcel. Therefore, none of the exceptions in CEQA Guidelines § 15300.2 apply to the project site.

As discussed above, none of the exceptions contained in CEQA Guidelines Section 15300.2 apply to the project, and the project is consistent with the criteria in CEQA Guidelines § 15061(b)(3); 15301(h), Class 1; and 15304, Class 4. The project involves minor alteration of land form and the removal of trees on a property that contains substantial amounts of large trees to create off-street parking spaces. The project, therefore, qualifies as exempt from the provisions of CEQA under § 15061(b)(3); 15301(h), Class 1; and 15304, Class 4.

Project Planner:



Immanuel Bereket
Principal Planner

Reviewed by:



Rachel Reid
Environmental Planning Manager

VICINITY MAP

